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ID

Rep
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 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)

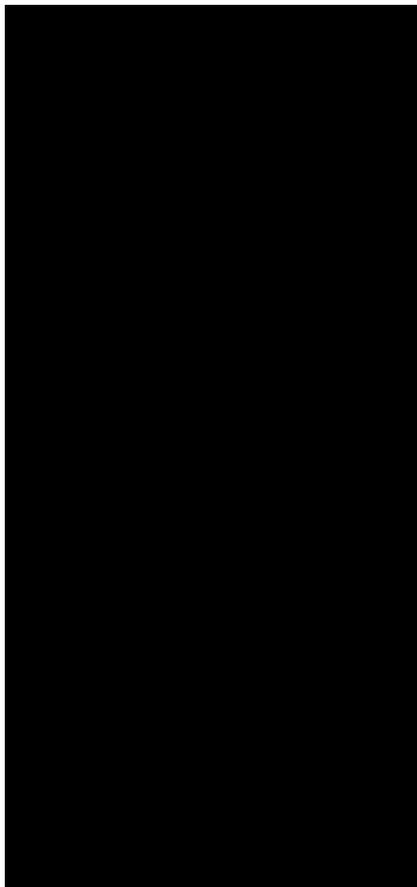
Address Line 1

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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	<input type="text"/>
First Name	<input type="text"/>
Last Name	<input type="text"/>
Organisation (where relevant)	<input type="text"/>
Address Line 1	<input type="text"/>
Address Line 2	<input type="text"/>
Address Line 3	<input type="text"/>
Post Code	<input type="text"/>
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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

The Whole Plan

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.

We consider the Plan is not sound on all grounds.

See attached detailed representations found in the Comprehensive Objection to Harborough District Council's Proposed Submission Draft Local Plan 2020-2041.

Continue on a separate sheet/ expand box if necessary

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

The proposed Plan overstates the housing requirement, relies on unviable and unachievable strategic sites without any detailed, funded plans on how to deliver any of the associated infrastructures with particular lack of information on transport, and has neglected to explore alternative, more sustainable strategic development options.

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 Plan is so fundamentally flawed it cannot be rectified by Modifications.

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.

Although we do not propose Modifications to the proposed HDC Plan, we would still like to attend the Examination.

Harborough District Council and all the authorities in the Housing Market Area must be held accountable for their failure to consider Strategic Alternatives and continued reliance on an outdated Strategic Growth Plan that is no longer relevant due to the non-delivery of the previously stated essential East/South Leicester Expressway by-pass.

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.**



Comprehensive Objection to Harborough District Council's Proposed Submission Draft Local Plan 2020-2041

Submitted by: StopTheNewTown.org ("STNT")

**On Behalf of Residents of Great Glen, Oadby, Stretton Hall and Other Surrounding Areas as
Set Out in The Table of Signatories (see relevant Appendix)**

V01.00

26th April 2025



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1 Introduction & Executive Summary

This comprehensive representation is formally submitted in response to Harborough District Council's (HDC) Proposed Submission Draft Local Plan 2020-2041 under Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). This submission reflects the collective concerns of the residents of Stretton Hall, Oadby, Great Glen, and surrounding communities, who's infrastructure, transport, livelihoods, environment and heritage will be directly and disproportionately impacted by the proposals set out within HDC's draft Local Plan.

After an extensive review of the Draft Local Plan, its supporting evidence base, associated consultation documents, and relevant national planning policies, we assert unequivocally that the Local Plan, in its current form, is fundamentally **unsound, fails legal compliance**, and is structurally deficient when assessed against the four critical planning principles and soundness tests outlined in Paragraphs 35 and 36 of the National Planning Policy Framework (NPPF, December 2023 and 2024).

These failures are not isolated but systemic, affecting multiple dimensions of the Plan including its strategic foundation, evidence base, infrastructure planning, and compliance with national policy objectives. Therefore, we also conclude the Plan is highly likely to fail under Examination due to procedural, strategic, evidential shortcomings risking prolonged delays, reputational damage, and adverse impacts on Harborough District's future development trajectory.

Our objection places particular emphasis on the deeply flawed, unviable, unjustified and unsustainable focus on Strategic Development Areas (SDAs) and sites and, in particular, on the SDA known as "**Land South of Gartree Road**". This site exemplifies the shortcomings of the Plan—highlighting systemic failures across housing strategy, infrastructure planning, environmental protection, viability, and consultation processes together with issues of poor site selection, lack of deliverability, existing severe infrastructure constraints, and environmental risks.

However, our concerns extend beyond this single allocation to encompass fundamental weaknesses in the Council's overall spatial strategy, the economic viability of its proposals, unrealistic assumptions about infrastructure funding, ineffective cross-boundary coordination, and a disregard for both past lessons and reasonable alternatives.



Key areas where the Plan demonstrably fails include, but are not limited to:

- The inclusion of **inflated housing targets** that exceed objectively assessed needs without robust justification, thereby encouraging unnecessary and unsustainable development pressures.
- The allocation of **premature, unviable, and infrastructure-deficient strategic sites**, most notably the proposed "Land South of Gartree Road" Strategic Development Area (SDA), which lacks both deliverability and alignment with sustainable development principles.
- A persistent failure to properly assess and consider **reasonable spatial alternatives**, including well-documented proposals such as those from the Willoughby Waterleys Residents' Association (WWRA), leading to a biased and unjustified spatial strategy.
- Significant and unresolved **infrastructure deficits**, spanning transport, healthcare, education, flood management, and utilities, compounded by a lack of secured funding and clear phasing plans, rendering the Plan undeliverable in practice.
- Repeated breaches of established **environmental protections, heritage conservation duties, flood risk policies**, and statutory obligations under the Equality Act 2010, indicating procedural shortcomings and a disregard for legal compliance.

This representation draws upon a comprehensive review of HDC's evidence base, responses from statutory consultees such as Leicestershire County Council, independent transport and viability assessments, as well as national policy guidance, including the NPPF and Planning Practice Guidance (PPG). It is intended to assist the Planning Inspectorate in concluding that the issues raised in this document are so significant, that Modifications are not likely to result in a "Sound" plan: this Plan cannot proceed to adoption due to its inherent unsoundness and procedural deficiencies.

In conclusion, in any event, HDC should address its reliance on unviable SDA allocations including the deeply flawed, unjustified and unsustainable allocation of the proposed Strategic Development Area (SDA) known as "**Land South of Gartree Road**", recalibrate housing targets, and ensuring infrastructure deliverability—HDC's Draft Local Plan cannot be considered sound. It is our firm position that, in its present state, the Plan must be found unsound at Examination due to its failure to satisfy the basic tests of positive preparation, justification, effectiveness, consistency with national policy, and legal compliance.



2 The Local Plan is Not Positively Prepared

2.1 Artificially Inflated Housing Targets Without Justification

Harborough District Council (HDC) has elected to apply an additional buffer of 1,657 dwellings above its objectively assessed housing need (OAN) (**Source:** Appendix 5 Housing trajectory 2020-2041 (as at 31 March 2023), page 179-181 of Appendix A Proposed Submission Local Plan post Cabinet changes 26225), despite clear guidance provided by NPPF Paragraph 79a, which exempts high-delivery authorities from such requirements. Over the past three years, HDC has consistently exceeded its housing delivery targets, achieving a delivery rate of 150%, well above the national threshold that removes the necessity for any buffer. This decision to inflate housing numbers is not supported by demographic trends, economic forecasts, or infrastructure capacity assessments. By ignoring this evidence, the Council has prioritised arbitrary numerical targets over balanced, sustainable community development.

16% over supply (1,657) houses to 2041 Why?

Total Housing Need		13182
Legal completions to 2020 to 31.3.23	2965	
Existing commitments (inc Lutterworth East)	5452	(8417)
To find		4765
New Allocations - Strategic Sites	2450	
- Market Towns	1670	
- Large Villages	1500	
- Medium Villages	452	
- Small Villages	350	6422
Over supply/ Buffer (16%)		1,657



Figure 1 - 16% Buffer - the details (after WWRA).



Despite this clear national policy guidance, HDC has proceeded to inflate its housing allocations, creating an unnecessary surplus that undermines core planning objectives. This over-allocation is not merely a technical oversight but a fundamental misstep that places unjustified strain on local infrastructure, public services, and the environment. It encourages unsustainable expansion into sensitive rural areas, eroding countryside character and contributing to urban sprawl.

The application of this unnecessary buffer introduces significant adverse consequences. It artificially expands development pressures into sensitive rural and semi-rural areas, leading to landscape erosion, increased urban sprawl, and the undermining of settlement identities—particularly affecting communities such as Great Glen, Oadby and Stretton Hall when considering the deeply flawed, unjustified and unsustainable allocation of the proposed Strategic Development Area (SDA) known as "**Land South of Gartree Road**". Moreover, this over-allocation forces reliance on large, complex, and historically underperforming strategic sites that are historically and demonstrably slow to deliver and vulnerable to market fluctuations, rather than focusing on sustainable, deliverable locations.

Finally, the decision to apply such an unnecessary buffer contradicts principles of proportional growth and fails to respect the balance between meeting housing needs and safeguarding community identity, landscape, and environmental sustainability.

2.2 Premature and Unsupported Strategic Site Allocation

The proposed allocation of the "Land South of Gartree Road" Strategic Development Area (SDA) is emblematic of HDC's unsound approach to spatial planning and epitomizes this flawed approach. This site has been promoted within the Local Plan despite clear evidence indicating that it is **premature**, speculative, and lacking in fundamental deliverability criteria. It also lacks the strategic coherence required to support a development of this magnitude. The Plan rests on unsubstantiated and speculative assumptions regarding infrastructure delivery, market viability, and phasing, and critically, on transport and the impact on the A6 corridor, none of which are supported by binding agreements, secured funding, or detailed implementation frameworks.

For instance, Leicestershire County Council's (LCC) formal Response (March 2025) to HDC's proposed Local Plan, states (where **PGC** stands for 'Priority Growth Corridor' (PGC) as set out in the Leicester and Leicestershire Strategic Growth Plan (SGP) to 2050; and **JTE** stands for South Leicestershire Joint Transport Evidence):

- item 42 – "**it should be a concern** to partners across the wider Leicester and Leicestershire Housing Market Area if **sites in the district of Harborough are delivered**



*in such a way that it comprises delivery of further future growth in the PGC, and by extension **undermines the SGP’s delivery***”

- item 43 – “there are **other significant factors that affect the Plan from a transport perspective**, which do appear to be **material in terms of considerations of the Plan’s soundness**. “
- item 45 – “A report on Stage 1 of the JTE work has been published by the district council as part of the Plan’s evidence base. Emerging evidence from that wider study work is showing that growth in the district **combined with proposed growth elsewhere across the south of Leicestershire, most notably in the district of Oadby and Wigston**, will have a significant impact on the district’s road network. This **includes cumulative and cross-boundary impacts**, including on routes within the district of Oadby and Wigston and the City of Leicester. Most notably, those impacts include (with reference to Figure 1):
 - **Adding to existing traffic issues on the A6 (and other routes) through the Kibworth’s (1); but perhaps more significantly**



08:19 a.m.
Leicester Road into Kibworth



08:28 a.m.
Still on Leicester Road into Kibworth

Figure 2 - morning traffic into Kibworth from Oadby.



08:30 a.m. Glen Rise/Glen Road/Leicester Road Roundabout

08:50 a.m. Stoneygate



Figure 3 - morning traffic before getting into Oadby and in Leicester

- **Congestion on the A6 corridor through the Kibworth's and in Oadby is leading to a 'haloing effect' of (relatively longer-distance) trips, whereby traffic is avoiding routes through the Leicester Urban Area by using lower class rural routes around the east of the Area, including the B6047 (2); via Stoughton (2a); and routes north of the A47 towards the Thurmaston Syston area and the A46(N), including through communities such as Houghton on the Hill, Keyham and Barkby and Beeby (2b); and**
- *Likewise a similar effect to the south of Leicester, including impacting on lower class rural routes through communities such as Saddington and, via Shearsby Crossroads, Gilmorton across towards Lutterworth and M1 J20 (3)."*

With the Local Transport Authority (LTA) concluding in that report at item 75:

"The LTA considers that the Plan in its current form fails to meet the NPPF tests of soundness insofar of its:

• **Effectiveness, that is:**

- **It fails to provide a coherent policy basis to ensure that transport interventions necessary to enable the Plan's site allocations delivery are deliverable over its time period, especially in respect of interventions necessary to deal with cumulative and**



cross-boundary transport matters; rather this seemingly has been deferred to the development management process;

- ***The delivery of elements of the Plan’s spatial strategy are dependent on strategic scale improvements to the SRN, but the LTA has no confidence that such will be brought forward and delivered within the Plan’s time period; and***
- ***It lacks any coherent, (likely) lawful policy approach to seeking to secure developer (STNT addition: or public sector) contributions towards transport measures that will be required to address cumulative and/or cross-boundary transport impacts, particularly on the A6 corridor.***

• ***Consistency with national policy:*** *It provides no coherent policy basis for enabling the coordinated delivery of transport interventions to achieve sustainable development in reality.”*

Indeed, Leicestershire County Council (LCC)’s Head of Planning & Development and her colleague explicitly stated the HDC proposed local plan is “**premature**” and “**unsound**” during a Cabinet Meeting on 18th March 2025 (<https://www.youtube.com/watch?v=g0DrkF3Fx0M>, from 54 mins to 1hr 12 mins is the discussion regarding the HDC proposed Local Plan). This is due to the absence of a credible infrastructure strategy and credible delivery plans, in particular, with respect to transport (LCC Report to Chief Executive, p.3). Other items mentioned where the “timetable for delivery of the plan is running at a faster than the evidence base”.

Critical infrastructure components—such as major road improvements, public transport links, healthcare facilities, educational provision, and utilities—remain undefined, unfunded, or entirely absent from the Infrastructure Delivery Plan. Without these essential elements, the proposed SDA on the Land South of Gartree Road risks becoming a dormitory settlement, heavily car-dependent and devoid of the services necessary to support a sustainable community.

Additionally, the viability of the site is contingent upon optimistic projections of developer contributions, land assembly, and market conditions, all of which are subject to volatility and negotiation. The absence of transparency from site promoters regarding land values and infrastructure costs further exacerbates concerns, exposing the Council to the risk of future policy compromises, such as reductions in affordable housing delivery (as was already the case for Lutterworth East with a reduction from 40% AH down to 12%) or deferred infrastructure commitments.

LCC's assessment highlights that progressing with such a major SDA crossing boundaries between Oadby, Great Glen and Stretton Hall in the absence of defined and secured transport,



healthcare, education, and utility infrastructure not only jeopardizes the success of the development but also exposes existing communities to disproportionate harm.

In essence, advancing this strategic allocation without understanding and securing the prerequisites for sustainable development contravenes the principles of positive preparation. It places undue burdens on existing communities, threatens to deliver substandard outcomes, and undermines confidence in the Council's ability to manage growth responsibly. Without firm commitments, the risk is that residents will face years of inadequate services, congestion, and environmental degradation while developers prioritise housing delivery over infrastructure obligations.

In summary, the Plan's approach is neither aligned with national policy nor reflective of responsible, forward-thinking planning practice. It prioritises headline housing numbers over deliverability, community wellbeing, and sustainability.

3 The Local Plan is Not Justified

3.1 Failure to Consider Reasonable Alternatives

A core requirement of any sound Local Plan is that it demonstrates a clear and transparent assessment of reasonable alternatives, ensuring that the chosen strategy is the most appropriate when considered against realistic options and supported by proportionate evidence. HDC has demonstrably failed in this duty, as required under the National Planning Policy Framework (NPPF) which undermines confidence in the integrity of its plan-making process.

One significant omission is the lack of proper consideration of the **Willoughby Waterleys Residents' Association (WWRA) proposal** for strategic development which offers a well-evidenced, sustainable alternative growth location.

The WWRA proposal focuses on west Leicester, adjacent to New Lubbethorpe, an area with significantly better existing infrastructure, including direct access to the M1 and M69, proximity to established employment hubs, and integration with current and planned public transport networks such as park-and-ride services and future rail connectivity. This contrasts sharply with the "Land South of Gartree Road" allocation, which is isolated, infrastructure-deficient, and heavily reliant on speculative future improvements.

Despite these advantages, HDC's Site Selection Methodology (Table 4.2, p.18) and the accompanying Sustainability Appraisal (Appendix C) provide no substantive evaluation of the WWRA proposal. There is no evidence of a balanced comparison, no published rationale for its



exclusion, and no engagement with the proponents, who have awaited a formal response for over six years. This omission indicates a pre-determined approach, undermining the integrity of the plan-making process and breaching the requirement to consider reasonable alternatives in a proportionate and evidence-based manner.

This alternative spatial strategy presents other advantages, including the close alignment with existing and planned employment hubs, including logistics centres and business parks, thereby reducing the need for long-distance commuting and supporting sustainable economic growth consistent with national and regional strategies. This spatial strategy also offers opportunities to integrate seamlessly with existing development at New Lubbethorpe, where infrastructure is either in place or scheduled for delivery, offering a more viable, phased, and sustainable solution that aligns with the principles of compact growth and efficient land use.

Despite these advantages, HDC's Site Selection Methodology (e.g. Table 4.2, p.27) and the accompanying Sustainability Appraisal (e.g. Appendix C) provide no substantive evidence that the WWRA proposal—or any comparable alternatives—were objectively assessed. There is no evidence of a balanced comparison, no published rationale for its exclusion, and no engagement with the proponents, who have awaited a formal response for over six years. This omission indicates a pre-determined approach, undermining the integrity of the plan-making process and breaching the requirement to consider reasonable alternatives in a proportionate and evidence-based manner. Moreover, HDC's approach ignores the opportunity to align development with existing and emerging infrastructure investment frameworks, such as those promoted by Midlands Connect and Transport for the East Midlands, which emphasize westward growth corridors due to their superior connectivity and economic potential.

Noting the answer to a question put to Harborough's Extraordinary Meeting of the Cabinet Meeting by STNT on 20th February 2025 which queried why the WWRA's spatial strategy had not been considered, HDC's cabinet answered ([Minutes of Extraordinary Cabinet - 20.02.2025](#)), "New Lubbethorpe is located in Blaby District which has to provide a significant amount of growth to meet development needs of their area. Government requires us to meet the needs of our area. The development allocated in the draft local plan is to predominantly to meet the needs of the District as required by national policy. Additional development in the Lubbethorpe Area would not count towards meeting the development needs of Harborough District". This amounts to stating "each district has to deliver its own target within its own boundaries" which is patently incorrect in that all the Leicestershire Councils meet through the Leicester and Leicestershire Members Advisory Group to coordinate strategy including local plans ([Leicester & Leicestershire Authorities - Statement of Common Ground relating to Housing and Employment Land Needs \(June 2022\)](#)). One of the earlier outcomes from such a process was for Leicester



City to allocate some of its home delivery targets with adjacent councils including HDC in the recent past ([Harborough Local Plan - Leicester and Leicestershire Statement of Common Ground relating to housing and employment land needs - 18th September 2023](#)). Thus, developing a sensible spatial strategy across boundaries within Leicestershire such as that proposed by WWRA is entirely possible and must be considered. This disregard for collaborative planning principles directly conflicts with both the spirit and letter of national policy guidance, particularly the requirements for effective community involvement and cross-boundary strategic cooperation set out in the NPPF.

Moreover, numerous small and medium-sized sites identified within the SHELAA (Strategic Housing and Economic Land Availability Assessment, 2024) across sustainable settlements were similarly disregarded in favour of a risky reliance on large strategic sites such as that proposed on the Land South of Gartree road. These smaller sites offer quicker delivery, lower infrastructure burdens, and alignment with existing community services— yet HDC has failed to justify why these smaller sites were sidelined whilst offering ([Minutes of Extraordinary Cabinet - 20.02.2025](#)) that “Large sites can be more complex to deliver and take longer to come forward. However, they offer greater potential for infrastructure compared to smaller sites, which is why the infrastructure associated with Land South of Gartree Road includes new schools, health centre, community infrastructure and transport infrastructure”. However as can be seen throughout this submission, there are no details of how, from whom or when the necessary funds will become available to invest in the infrastructure for larger sites. In contrast, HDC could adopt a Community Infrastructure Levy (CIL) to fund infrastructure associated with smaller sites. We understand Charnwood Borough Council elected to go into the process to opt for CIL when it became clear at its Examination that it did not have the appropriate mechanisms in place to secure the funds needed to build the infrastructure desired by Leicestershire County Council. Noting that no update has been provided annually since HDC’s last Infrastructure Funding Statement (IFS) covers 2022-2023, it appears that HDC is, year after year, not making any progress on adopting a CIL nor offering any rationale as to why this is the case: to this date, HDC does not have a CIL charge.

This lack of proper alternatives assessment renders the Local Plan unjustified, exposing it to challenge under NPPF Paragraph 36(b).

3.2 Obsolete Strategic Growth Context

The foundation of HDC's spatial strategy rests on an outdated vision set out in the **2018 Leicester & Leicestershire Strategic Growth Plan (SGP)**. In the below picture from that report, one can note that major employment sites immediately to the south of Leicester City are few



and far between without any transportation infrastructure of any significance to the South/East of the City.

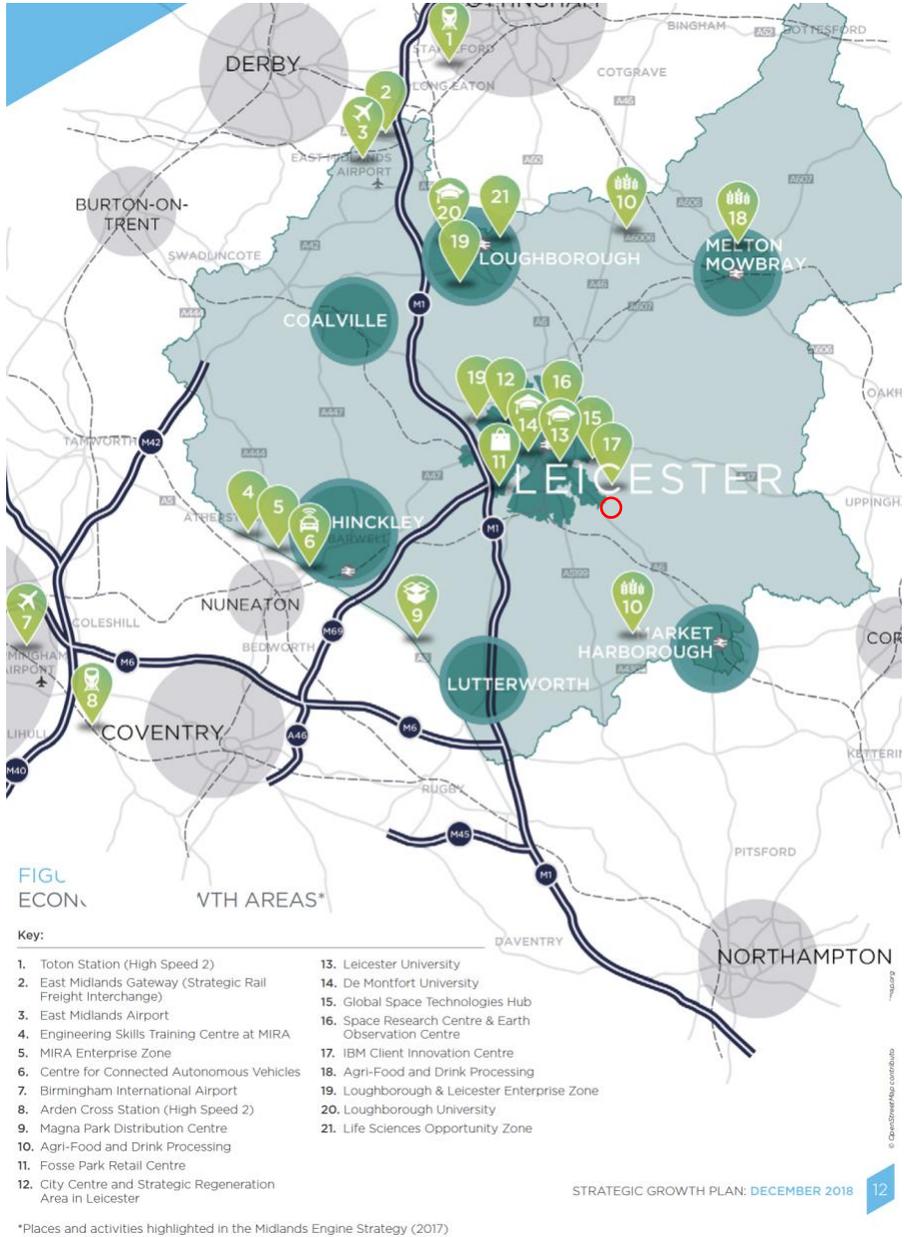


Figure 43- Economy and Midlands Engine Strategy (LEICESTER & LEICESTERSHIRE 2050: OUR VISION FOR GROWTH, Strategic Growth Plan), the red circle highlights approximate area of the proposed SDA on the Land South of Gartree Road.

Central to that strategy was the delivery of the **A46 Expressway**, a major infrastructure project intended to unlock development potential around the south and east of Leicester by providing critical orbital connectivity with a view to relieving congestion.

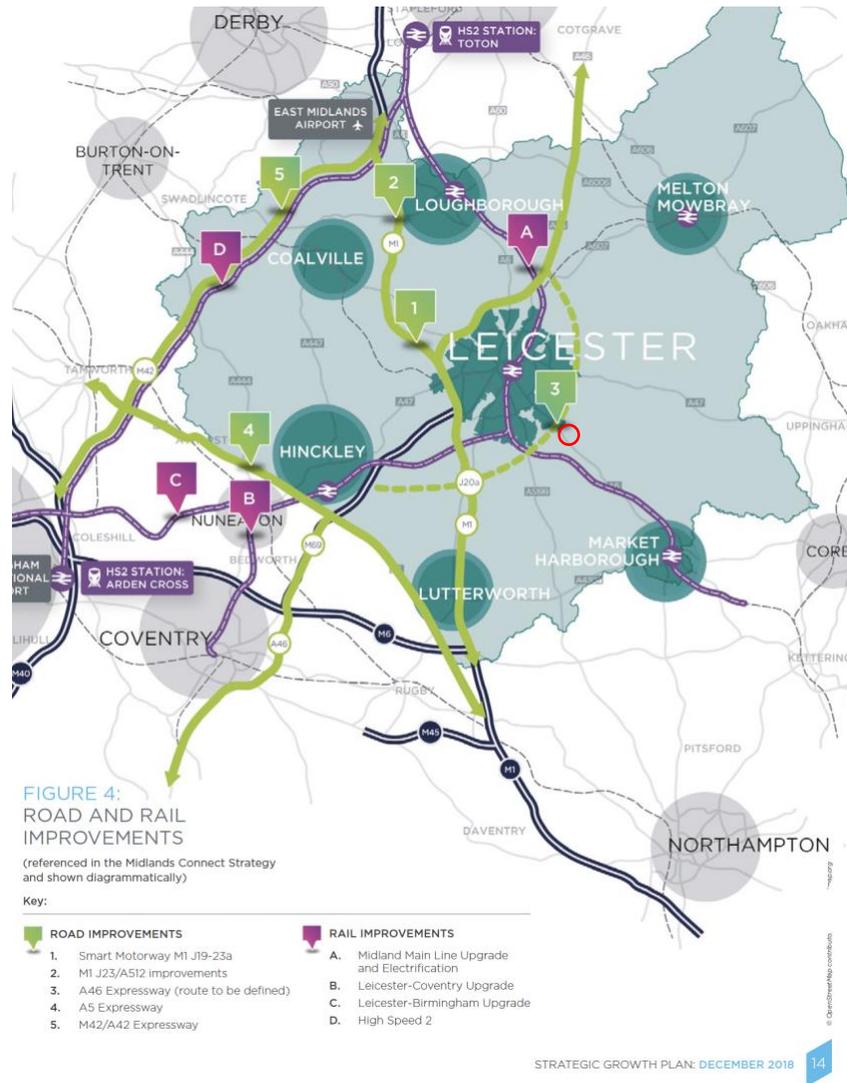


Figure 5 - Expressway East/South of Leicester City (LEICESTER & LEICESTERSHIRE 2050: OUR VISION FOR GROWTH, Strategic Growth Plan), the red circle highlights approximate area of the proposed SDA on the Land South of Gartree Road.

However, Midlands Connect formally abandoned the A46 Expressway proposal in 2020 stating that it did not have a strategic function citing environmental concerns, cost implications, and shifting regional transport priorities. Despite this, the Leicestershire authorities, including HDC, continue to pursue a growth strategy designed around infrastructure that no longer exists within any deliverable framework.

Yet, the cancellation of the A46 Expressway fundamentally altered the strategic landscape. Without this critical piece of infrastructure, the rationale for focusing large-scale growth in areas such as the "Land South of Gartree Road" collapses entirely. Continued reliance on the obsolete SGP reflects a failure to update strategic thinking in light of changed circumstances and evolving regional priorities.



HDC’s Development Strategy Paper (Feb 2025) and its Site Selection documents fail to reflect this strategic shift. There is no replacement infrastructure plan, no reassessment of growth corridors, and no adaptation to align with updated regional strategies such as those promoted by Midlands Connect or Transport for the East Midlands, which now favour westward growth due to superior connectivity.

This outdated context not only invalidates the spatial logic underpinning the Plan but also exposes HDC to significant risks associated with undeliverable development, severe and unmitigated transport impacts, increased congestion on unsuitable rural roads, and unsustainable patterns of dispersed growth. The lack of a replacement infrastructure strategy leaves a vacuum in which speculative development is being promoted without the necessary framework to support it.

In addition, it is worth noting transport spend per capita in the East Midlands is already below the UK average and has steadily **decreased** since the early 2000s so it is highly unrealistic to assume additional funding for new transport infrastructure will be available from other non-developer sources with local authorities and Highway Authorities’ budgets already fully deployed on maintaining and fixing existing roads which are rapidly deteriorating (viz recent HMG push for local authorities to fix what some describe as a pothole epidemic).

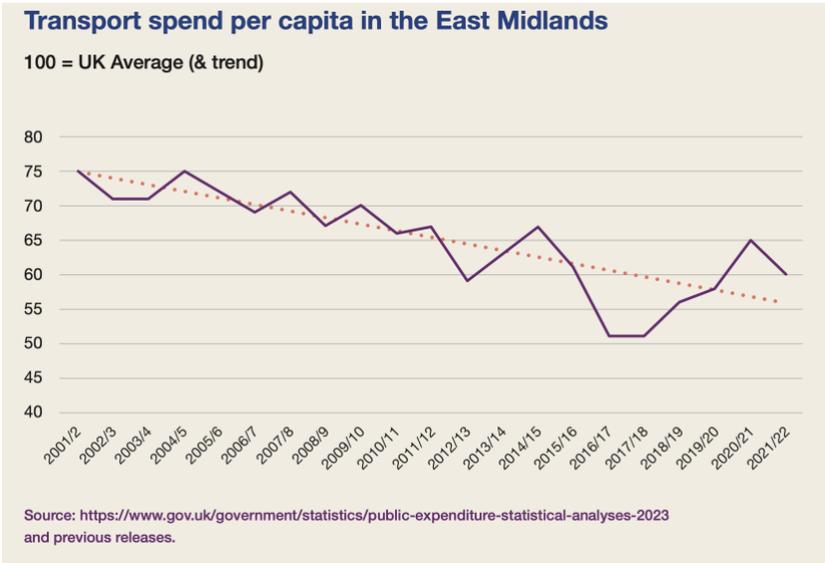


Figure 6 - Our Shared Vision for the East Midlands, by Transport for the East Midlands and Midlands Connect, March 2024.

A sound plan must be dynamic and responsive to evolving infrastructure, commercial and budgetary realities, regional economic shifts, and environmental constraints.



By persisting with an obsolete strategic foundation, HDC exposes its Local Plan to significant risks:

- **Undeliverable and unsustainable growth patterns** reliant on inadequate transport networks.
- **Severe congestion impacts**, particularly along the A6 and surrounding rural routes.
- **Misalignment with regional economic and transport priorities**, reducing access to funding and partnership opportunities.

This reliance on a defunct strategy demonstrates a failure to respond to evolving circumstances, rendering the Plan outdated, inflexible, and unjustified in accordance with NPPF requirements.

HDC's persistence with a defunct strategy—despite clear evidence from bodies such as Leicestershire County Council and Midlands Connect—renders its approach fundamentally unjustified, outdated, and unsound in accordance with NPPF requirements.

4 The Local Plan is Not Effective

4.1 Viability and Deliverability Concerns

The viability of the proposed "Land South of Gartree Road" Strategic Development Area (SDA) is **fundamentally flawed**. The Council's own *Harborough District Council Local Plan Viability, Main Viability Report* (January 2025, table 7.2, page 86) identifies this site as "**marginally** viable," meaning that its financial feasibility is precarious at best raising immediate concerns about the financial feasibility of delivering this site in accordance with policy requirements. A designation of marginal viability implies that even minor changes in market conditions—such as increases in construction costs, interest rates, or reductions in house prices, all of which have continued to move adversely over recent months—could render the entire development undeliverable. This risk is exacerbated by the absence of detailed, binding agreements regarding developer contributions, Section 106 obligations, and infrastructure funding. Without secured financial mechanisms, the likelihood of delivering necessary community facilities, affordable housing quotas, and essential infrastructure is minimal to vanishing small. It is worth noting developers can produce Viability Assessments (VAs) to extricate themselves from their prior commitments (e.g. planning application) because NPPF puts viability ahead of other considerations: in essence, nothing is binding. Here are but a few examples of SDAs and other sites where the initial Council vision did not translate into execution by developers including Scraftoft North, North of Melton, Lutterworth East S106's 40% Affordable Housing commitments scrapped.



Furthermore, STNT highlights the WWRA's analysis in their preparatory note in support of their Reg 19 response to HDC. In that document, they note Aspinall Verdi Viability Assessment (commissioned by HDC) highlights **“the details from Landowners on minimum land values appear still not to have been shared”**. This HDC commissioned Viability Assessment Report is clear: **allocations should not be made until they have obtained details from Landowners on minimum land values**, yet the Scraftoft and Bushby (S1) and Land South of Gartree Road & East Oadby (O1) site are included in HDC's proposed local plan.

Furthermore, WWRA highlight **“a number of weaknesses and omissions in the Aspinall Verdi Viability Assessment modelling, which will further exacerbate the strategic sites' viabilities.**

- 1. The modelling assumes a developers profit margin would be 17.5% on market housing. It is known that a margin of 20% at least would be expected by a speculative developer on such large-scale developments, to reflect risk. This is endorsed by the Oadby and Wigston Viability Assessment which correctly uses 20%.*
- 2. Again, the profit margin at 6% for Affordable Housing is too low. The margin expected would more likely be 15%, especially given the funding difficulties that Registered Providers are currently experiencing.*
- 3. The viabilities do not take account of all the necessary infrastructure, particularly with regard to Highways and Transport. They cannot, because it has not all been identified, quantified and costed as highlighted by the County Council's representations.*
- 4. There are future costs coming to the House building industry which are not included and will be relevant. Firstly, The Safety Levy, which will be introduced on new developments in Autumn 2026. We estimate that this will be approximately £7m on site O1. Secondly, increased service connections charges from 1st April 2025. We estimate that this could be circa another £6m on site O1. These are known and will apply. Other inflationary pressures will also affect future viability.*

To highlight these points, we summarise the viability for site O1 as shown on page 86 of the report and what it potentially would like with these further items included. We have no reason to doubt the levels of general cost items or expected revenues.



	£M <u>Aspinall Verdi</u>	£M <u>WWRA</u>
Gross Development Value	<u>1108.4</u>	<u>1108.4</u>
Developer Profit	<u>164.7</u>	<u>208.9</u>
Costs - Build £144/ft sq	554.5	
- Sales costs	21.5	
- Externals/Roads/Services	76.9	
- Part L costs	24.0	
- Cat 4 costs	11.5	
- BNG	4.8	
- known s106 Costs (£17656 per plot)	70.6	
- Priced infrastructure as Infra. Delivery Plan	38.7	
- Other Costs	<u>91.1</u>	
Total Costs	893.6	893.6
Safety Levy £3k (average on 2400 homes)		7.2
Increased Service connections £1.5k on 4,000 homes		6.0
Unidentified and unpriced further Transport and Highway Improvements		<u>exc.</u>
Amended Costs at least		906.8
Residual Land Value	<u>50.1</u>	<u>(7.3)</u>
Benchmark Land Value	<u>63.5</u>	<u>63.5</u>

Figure 7 - WWRA's summary of the viability for site O1 as shown on page 86 of the Aspinall Verdi Viability Assessment report with the addition of the additional weaknesses and omissions included

As a result, the WWRA notes ***"This demonstrates that we start the Plan making, knowing that major strategic sites are not going to be policy compliant. Affordable housing at 40% will not be delivered and sites may not be delivered at all, once we know the fuller implications of the as yet unidentified transport infrastructure."***

Indeed, Para 66 of the NPPF stipulates that Affordable Housing could be as low as 10% as an absolute minimum. It is our contention that even as low as this provision, there is real uncertainty over whether the BLV (Benchmark Land Value) is exceeded. Until the necessary Transport and Highways requirements are fully identified, quantified, costed and shared across specific Allocations, this question is almost impossible to answer. What is certain is that the 40% Affordable Housing cannot be provided on the medium value strategic sites."



Historic patterns within Harborough District further demonstrate that large strategic sites frequently underperform, as evidenced by delays and viability compromises at Lutterworth East and the failed delivery of Scraftoft North. Proceeding with a marginal site such as Gartree Road places the Council's housing strategy at significant risk of failure.

Recent and current precedents demonstrates that HDC has consistently struggled to bring forward large strategic sites effectively:

- **Scraftoft North** — Initially allocated in the 2019 Local Plan, this site is now proposed for deallocation due to longstanding contamination concerns, including known asbestos presence, and persistent viability challenges. This failure directly contributed to HDC's inability to maintain a Five-Year Housing Land Supply.
- **Lutterworth East** — Despite securing outline planning permission for 2,750 homes, delivery has been delayed until approximately 2032. The reason for this considerable delay is not clear without a positive statement from HDC as to why that is the case. In a further indication of viability issues, HDC reduced its affordable housing requirement from 40% to just 12%, undermining key policy objectives.

These examples highlight a systemic over-reliance on ambitious but fundamentally flawed strategic allocations. The proposed Gartree Road SDA is following the same trajectory, risking years of stagnation, policy compromises, and wasted public resources. Without clear evidence of deliverability, this plan **cannot be deemed to be effective**.

4.2 Infrastructure Deficit

A critical component of an effective Local Plan is the assurance that infrastructure will be delivered in tandem with housing growth. However, the **South Leicestershire Joint Transport Evidence (Stage 1, Jan 2025)** provides compelling data on existing and forecasted congestion across critical transport corridors and highlights severe shortfalls across key infrastructure sectors. The study underscores that key routes, such as the **A6 corridor** (notably from Kibworth to Oadby), are already operating at full capacity during peak hours. The situation is exacerbated by the reliance on fragile rural lanes, including the **Roman Gartree Road** and a few **other single lane rural roads to support the extra traffic** (e.g. Stretton Road, Mere Lane and Stretton Lane, Gaulby Road, Oaks Road, Station Road and Glen Road, Kibworth Road, Leicester Road via Fleckney, Kilby/Wistow and Fleckney roads, Foston Lane, etc, etc), which has road safety implications with expected impact all the way and beyond **Shady Lane which is already heavily congested**, and a network of single-track, often weak, bridges leading towards the City on Gartree road and towards Magna Park.



Despite these clear warnings, there is **no secured, fully funded or detailed plan** to deliver the extensive infrastructure upgrades required to support the proposed growth:

- Major road enhancements and bypasses to alleviate pressure on the A6 corridor, Gartree Road and surrounding rural routes.
- Significant investment in public transport and active travel to reduce car dependency.

Many greenfield developments are in poor locations for sustainable transport and are car dependent

In search of the station...

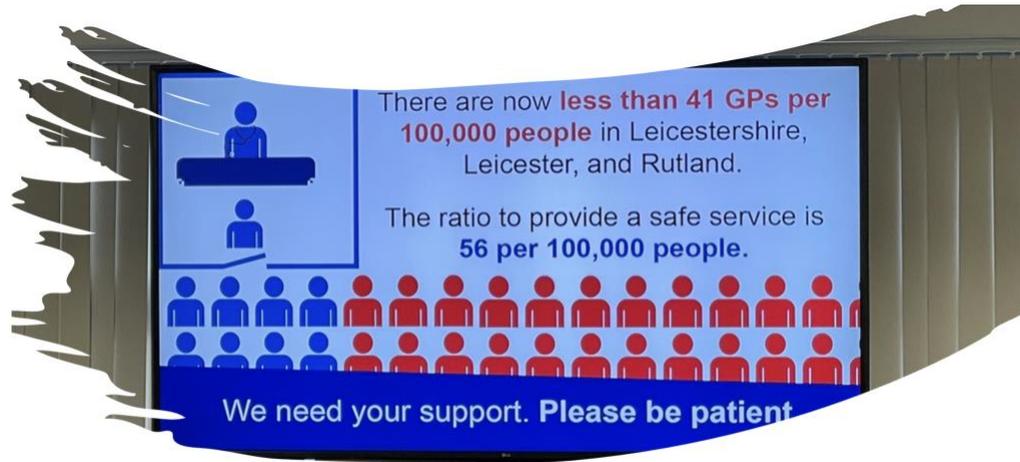
Transport for New Homes

X What is going badly:

- **Wrong location.** Many greenfield developments are in poor locations for sustainable transport and are car dependent.
- **Traffic generation.** Traffic is being created on the fringe of small and larger towns and on the wider road network, lengthening journey times.
- **Drive-to destinations are increasing** in tandem with new housing and roads, drawing people out of town and competing with town centres.
- **A lack of new local stations, new metros and tram systems** built to support large-scale housing over a wide area, as part of transit-oriented development.
- **Failure to be bus friendly.** The layout, access and location of most greenfield sites meant that they were not easy to serve by bus and the density of population was too low to provide sufficient passengers.
- **Local centres and promised 'high streets' have not appeared.** Car-based developments often didn't develop small and local shops and cafes on streets, but there was a proliferation of large-scale car-based retail, drive restaurants and out of town eateries accessed off and major roads.
- **Parking ruins the public realm with too much** In many greenfield sites parking ended up dominating public realm and the use of land.
- **Not connected to existing settlements by** Many urban extensions were not properly joined to parent towns by safe and convenient overlooked routes.
- **Cycling provision might exist** within new developments but where housing was built in the context of roundabouts and high volumes of traffic, it was dangerous to cycle beyond it. A good network of cycle lanes was missing.
- **Traffic noise** was a problem where new homes were close to and in association with the major road network.

Figure 8 - SDA South of Gartree Road combined with Oadby and Great Glen's developments away from credible transport systems will entrench car dependency (after Transport for New Homes, www.transportfornewhomes.org.uk)

- Provision of healthcare facilities, where Leicestershire already faces a critical shortage of GPs (fewer than 41 per 100,000 population versus a safe threshold of 56). Healthcare provision is equally deficient, with existing GP practices already operating over capacity and no confirmed delivery of new medical facilities.



No money for **services**?

Figure 9 - December 2024, Victoria Park Reception Display

- Expansion of education infrastructure, including primary and secondary schools.
- Upgrades to sewage treatment, surface water management, and flood defences, particularly given recent flooding events in Great Glen (January 2025). Flood mitigation measures are notably absent, despite clear evidence of recent flood events in Great Glen and the surrounding area.



No money for **infrastructure**?

Figure 10 - Great Glen Flood, January 2025

The cumulative impact of these deficits means that any development at the Gartree Road SDA would overwhelm existing services, degrade quality of life for both new and existing residents,



and embed long-term sustainability challenges. The Infrastructure Delivery Plan lacks specificity, funding certainty, and phased implementation strategies, rendering the Local Plan ineffective in practical terms.

In short, the absence of secured funding or phased delivery mechanisms renders the Plan speculative and undeliverable in infrastructure terms.

4.3 Cross-Boundary Failures

Effective strategic planning demands robust, yet seamless, coordination across administrative boundaries, particularly, where developments straddle or impact neighbouring authorities. Unfortunately, Harborough District Council has failed to maintain up-to-date Statements of Common Ground (SoCG) with key partners, including Oadby & Wigston Borough Council and Leicester City Council.

The **Statement of Common Ground (June 2022)** is outdated and fails to address the cumulative impacts arising from adjacent site allocations proposed by both councils, infrastructure demands, transport pressures, or environmental impacts associated with the proposed Gartree Road SDA. There is no evidence of updated agreements covering joint infrastructure delivery, traffic mitigation strategies, public transport integration, healthcare service coverage, education provision or shared services provision. It should be noted we have yet to see a Statement of Common Ground between HDC and the Highway Authorities which one would think should be in place. For example, in the west of the district, there are ongoing issues with the required delivery of improvements to the A5 arising from the expansion of logistics bases especially at Magna Park, Lutterworth. Those improvements are in the hands of the National Highways receiving funding from the Treasury. No agreements are, to our knowledge, in place with these bodies to fund the requisite improvements during the proposed plan period.

This deficiency risks duplicative, disjointed development patterns that will compound infrastructure pressures and undermine sustainable growth objectives. By deferring critical cross-boundary matters, HDC has failed to demonstrate that its Plan is capable of effective implementation over the plan period.

In short, this absence of effective cross-boundary collaboration contravenes the Duty to Cooperate and undermines the deliverability of shared infrastructure solutions. Without renewed and robust agreements, the Local Plan cannot demonstrate that it is capable of being implemented effectively across administrative boundaries, exposing it to failure at Examination.



5 The Local Plan is Not Consistent with National Policy

The Harborough District Council's Proposed Submission Draft Local Plan 2020-2041 demonstrates a fundamental misalignment with numerous core principles and requirements set out within the National Planning Policy Framework (NPPF, 2023 and equivalent in NPPF 2024). This inconsistency manifests across several critical areas, each contributing to a cumulative failure to promote sustainable, inclusive, and legally compliant development.

Firstly, the Plan heavily **promotes car-dependent growth**, particularly through the allocation of the "Land South of Gartree Road" Strategic Development Area (SDA). This site is geographically isolated from existing public transport infrastructure, lacks access to rail infrastructure, lacks proximity to key employment centres, and offers no credible, funded proposals for enhancing sustainable transport options. For instance, the promised "frequent (minimum 15-minute) zero carbon bus service" (Large Strategic Site Assessment report) remains aspirational, unsupported by the Viability Report or Infrastructure Delivery Plan. This approach entrenches reliance on private vehicles, exacerbating traffic congestion, increasing carbon emissions, and directly conflicting with NPPF objectives related to sustainable transport (Paragraphs 109-114) and climate change mitigation (Paragraph 162-169).

Secondly, the Plan **fails to protect heritage assets**. The allocation of development land encompassing the **Stretton Magna Scheduled Monument** (Stretton Magna deserted village with moated site and visible earthworks evidence for medieval village houses and streets before 1400), along with the proximity to the Grade II* listed Church of St Giles, all off the **Roman Gartree Road**, together with a wide cluster of significant other designated heritage assets (including, but not limited to, the Grade II listed obelisk circa 200 metres south of Stretton Hall, the Grade II* listed Stretton Hall building, clear ridge and furrow medieval ploughland traces dating from the 11th to 18th centuries, the 1726 Leicester to Harborough turnpike road, grazing fields dating from about 1770, hedgerows with standard trees planted in the late 18th century, 18th and 19th century farmhouses and 'country houses', The Grade II* Listed church, for which the above features are the setting and other sites of historical importance listed in the "Great Glen Neighbourhood Plan, Strategic Environmental Assessment Determination Report prepared by Harborough District Council on behalf of Great Glen Parish Council in June 2019"), poses a serious risk of substantial harm to irreplaceable cultural heritage. As noted on page 36 of the Heritage Analysis of Local Plan Sites (Nov 2024) "As the northern boundary of the [Gartree Road SDA] site runs along the **Roman Gartree Road** it is highly likely that there will be below ground archaeological implications for the development of this site". In the same report, page 37, HDC notes "This is a highly sensitive site containing and in close proximity to some very significant heritage assets. A heritage impact assessment would be required to fully understand the impact



of development on the range of assets, and their settings, in the varying proximity to the site”. These add to the uncertainty as to the deliverability of the proposed SDA on the land south of Gartree Road. In fact, the Heritage Impact Assessment remains incomplete, and there is no evidence of compliance with NPPF Section 16, which require great weight to be given to the conservation of heritage assets irrespective of the level of harm.

Thirdly, the Plan **ignores flood risk warnings, or indeed, it disregards critical concerns regarding flood risk amplification** identified in both the Strategic Flood Risk Assessment (SFRA) and the Climate Change Risk Assessment. Significant portions of the proposed Gartree Road SDA fall within Flood Zones 2 and 3, and surface water flood pathways are prevalent throughout Great Glen and adjacent areas. The absence of a comprehensive, funded flood mitigation strategy contravenes the sequential, risk-based approach mandated by NPPF Paragraphs 170-182 (2024, or equivalent under NPPF 2023). Recent flood events in Great Glen (January 2025) underscore the inadequacy of existing drainage and flood mitigation infrastructure. The Plan lacks robust evidence that these risks have been effectively mitigated, placing future residents and existing communities at unnecessary risk.

In addition, there are clear **procedural failings under the Equality Act 2010** and the Public Sector Equality Duty (PSED). The Regulation 18 and 19 Consultation process relied predominantly on digital platforms, marginalising elderly residents, individuals with disabilities, and those lacking internet access. Furthermore, alternative language formats and accessible materials were not proactively provided, undermining inclusivity and equitable participation. In addition, public engagement events were limited in scope and poorly advertised. For instance, during the drop-in events paper copies of the 'proposed submission draft representation form' were not made accessible to residents without request and there is some evidence that HDC produced leaflets to advertise the consultation drop-in events around HDC were delivered after local events were held, or not delivered at all as seems to be the case at Stretton Hall. HDC cabinet meetings and extraordinary meetings were changed at the last minute, and it was unclear until a very short time before meetings as to whether questions could be asked from HDC; the consultation period itself closes at 09:00 a.m. on the 6th of May 2025, just after a Bank Holiday weekend when few people will think about completing forms online. That the 6th of May choice was poorly thought through since the 1st May Leicestershire County Council election seemingly made it impossible for Councillors to come to those events and answer critical questions from the public and an HDC officer was sent instead to STNT's 10th April 2025 public meetings. It remains that HDC should have elected to close the public consultation on its proposed Local Plan at the end of May, for instance, yet it chose not to do so. Next, HDC's online submission form is complex as it requires the user to make hundreds of individual comments against each individual map, paragraph and documents which run into the thousands of pages.



All these contributed to restricting meaningful public participation. The alternative Word document form is extremely restrictive and inconvenient to use.

These failures collectively illustrate that the Local Plan is inconsistent with national policy across environmental, social, and procedural dimensions. It neither supports sustainable development nor adheres to statutory obligations designed to safeguard communities, heritage, and the environment.

In summary, the Local Plan fails to align with national policy across multiple dimensions—environmental sustainability, heritage conservation, flood risk management, and procedural fairness—rendering it fundamentally inconsistent with the core objectives of the NPPF.

6 Clear and Preferable Alternatives Exist

There are demonstrably more sustainable, deliverable, and justified alternatives to the spatial strategy proposed within the proposed HDC Local Plan. These alternatives would enable Harborough District Council to meet its objectively assessed housing needs without resorting to speculative, infrastructure-deficient large and complex strategic sites such as "Land South of Gartree Road."

- A critical first step towards creating a sound and deliverable Local Plan is to prioritise and optimise existing strategic allocations before introducing new, untested SDAs. So, a primary focus should be placed on accelerating delivery at Lutterworth East since it already benefits from established planning frameworks, prior approvals, and partially developed infrastructure strategies. Existing strategic allocations must be optimised with demonstrable delivery before any new large-scale sites are considered. This approach aligns with national policy encouraging efficient land use, reduces risk, and ensures that public resources are directed towards deliverable outcomes rather than overextending into unviable territories. This includes addressing viability barriers, front-loading infrastructure delivery, and revisiting phasing strategies to bring forward housing completions earlier in the plan period. If Lutterworth East were properly supported, it could significantly reduce the pressure to allocate additional sites. For instance, with its outline planning permission for 2,750 houses of which 12% is affordable and includes strategic warehousing so has sources of local employment. Yet no houses are proposed to be built until ~2032, and it is not clear why one should wait until then. If it could deliver as little as two years sooner, that would be a further 300 homes that would not need to be found elsewhere. In addition, the 150 per annum target seems low: even the currently under-performing other strategic site at New Lubbethorpe site is providing more than that. Note other large sites are also significantly under expected delivery rates. The



largest at Thorpebury, near Scraftoft, is delivering even fewer houses and, so far, no infrastructure.

- The Council must also **reassess strategic options west of Leicester**, particularly, the spatial strategy proposed by the **Willoughby Waterleys Residents' Association (WWRA)** offers a superior, evidence-based alternative to the flawed eastern expansion model. Despite being presented to the Council over six years ago, these proposals have been largely ignored without adequate justification. Situated along established transport corridors, including direct access to the **M1**, **M69**, and proximity to strategic employment hubs, this west Leicester growth option capitalises on existing and planned infrastructure investments, such as park-and-ride facilities and potential rail enhancements. Furthermore, integration with developments like **New Lubbethorpe** provides opportunities for shared infrastructure, reducing duplication and enhancing sustainability. Adoption of this strategy would not only align with regional growth priorities but also deliver housing in areas where market demand, infrastructure capacity, and employment opportunities are optimally balanced.
- HDC should adopt a more balanced and diversified housing strategy by avoiding an over-reliance on unviable SDAs. A diversified and resilient housing strategy should leverage the numerous **small-to-medium-sized sites** identified within the **SHELAA Main Report (2024)**. These sites, spread across sustainable settlements such as Lutterworth **Market Harbourough**, and **Broughton Astley**, offer immediate and practical opportunities for phased growth. They are nearer to larger centres of existing and future employment, such as Magna Park. By focusing on these deliverable locations, HDC can promote organic expansion that supports existing communities, minimises infrastructure strain, and aligns with NPPF guidance. This distributed approach mitigates the risks associated with over-reliance on single large-scale SDAs and enhances housing delivery rates by tapping into sites with fewer viability, infrastructure constraints and faster build-out potential.

By pursuing these clear and preferable alternatives, HDC could produce a sound, deliverable, and community-focused Local Plan that aligns with both local needs and national planning objectives.



7 Conclusion

In light of the numerous and significant deficiencies identified throughout this representation, it is the view of STNT that the issues raised in our report are so significant, that Modifications are not likely to result in a “Sound” plan. In any event, HDC should urgently address the following in its Draft Local Plan 2020-2041 to restore a modicum of legal compliance, and public confidence in the Local Plan with alignment with statutory requirements, national policy, deliverability, and the long-term interests of Harborough District’s communities:

- **Withdraw HDC’s proposed Local Plan particular emphasis on the deeply flawed, unviable, unjustified and unsustainable focus on Strategic Development Areas (SDAs). In particular, remove the "Land South of Gartree Road" SDA** entirely from the Local Plan. This allocation is deeply flawed due to its demonstrable lack of financial viability, absence of critical infrastructure, significant environmental and heritage impacts, and its incompatibility with sustainable development principles. Retaining this site exposes the Council to delivery failure, legal challenges, and irreversible harm to local character and biodiversity.
- **Recalibrate housing targets** by strictly adhering to the objectively assessed housing need (OAN) without imposing arbitrary or unjustified buffers. This recalibration will prevent unnecessary expansion into greenfield sites, reduce infrastructure burdens, and ensure that growth is proportionate, sustainable, and reflective of actual demographic and economic forecasts. It will also align the Plan with NPPF guidance, which discourages over-allocation where a Council has a proven record of housing delivery.
- **Conduct a transparent, comprehensive, and methodologically sound spatial reassessment.** This process must include a full evaluation of all reasonable alternatives, such as the WWRA west Leicester proposal and the numerous deliverable sites identified in the SHELAA reports. The reassessment should be evidence-led, consultative, and free from pre-determined outcomes, ensuring that future growth strategies genuinely reflect sustainability, infrastructure capacity, and regional connectivity. This includes addressing critical deficits in transport, healthcare, education, flood mitigation, and utilities to safeguard both new and existing communities.
- **Establish a robust, fully funded, and phased Infrastructure Delivery Plan (IDP).** This IDP must provide detailed timelines, secured funding mechanisms, and clear accountability structures for the delivery of transport, healthcare, education, utilities, flood defences, and green infrastructure. All this should be in place **prior** to the allocation sites. Furthermore, it should embed cross-boundary coordination protocols to ensure



seamless integration with neighbouring authorities, avoiding piecemeal or disjointed infrastructure provision.

- **Ensure comprehensive legal and procedural compliance** across all facets of the Plan’s preparation and implementation. This includes fulfilling the Duty to Cooperate through updated Statements of Common Ground, adhering to Equality Act 2010 obligations by enhancing accessibility and inclusivity in consultation processes, safeguarding environmental assets in line with the Environment Act 2021, and rigorously protecting heritage assets in accordance with NPPF and Historic England guidance.

This report sets out clear preferable alternatives which could enable HDC to produce a sound, deliverable, and community-focused Local Plan that aligns with both local needs and national planning objectives.

Addressing the above is not merely a recommendation but essential corrective actions required to transform the Local Plan into a document that could be capable of passing Examination, delivering sustainable communities, and maintaining public trust. Failure to implement these changes will leave the issues raised in this report such that that Modifications are not likely to result in a “Sound” plan. This will risk prolonged delays, costs, reputational damage, and adverse impacts on Harborough District’s future development trajectory.



8 Appendix

8.1 Appendix 1 – Broader Context and Supporting Evidence for the Objection to Harborough District Council's Local Plan (2020-2041)

8.1.1 Introduction

This annex provides a comprehensive, detailed, and contextual exploration of the wider strategic, legal, environmental, and socio-economic factors that underpin STNT's objection to Harborough District Council's (HDC) Proposed Submission Draft Local Plan 2020-2041. While the primary focus remains on the deeply concerning reliance on unviable Strategic Development Areas (SDAs), and in particular on the removal of the SDA known as "Land South of Gartree Road," this document also addresses broader systemic failures inherent in HDC's overall planning approach. These issues transcend a single site allocation and highlight a pattern of unsound decision-making and lack of foresight when dealing with spatial planning, sustainability, infrastructure delivery, public consultation, policy alignment, and failure to adhere to established planning principles.

Drawing upon an extensive evidence base—including HDC's own technical documents, statutory consultee feedback (notably from Leicestershire County Council), independent transport and viability studies, environmental assessments, and national policy frameworks such as the **NPPF (2024)**, the **Environment Act 2021**, and the **Climate Change Act 2008**—this annex demonstrates that the Local Plan is structurally unsound, undeliverable, and legally vulnerable.

The "Land South of Gartree Road" proposal exemplifies a planning strategy that is disconnected from modern principles of sustainable development, fails to deliver effective infrastructure, undermines community cohesion, and disregards environmental stewardship obligations. This annex draws upon an extensive body of evidence, including community-led research, feedback from statutory consultees such as Leicestershire County Council, regional transport analyses, environmental impact assessments, and core national policy frameworks such as the National Planning Policy Framework (NPPF 2024), the Environment Act 2021, and the Government's 25 Year Environment Plan.

In addition to these technical and policy-based assessments, this annex integrates the lived experiences, concerns, and insights of local residents—voices that provide essential context often overlooked in formal documentation. This document integrates critical insights from community engagement, highlighting the lived experiences of residents in Oadby, Great Glen,



Stretton Hall and surrounding areas. The cumulative weight of this evidence demonstrates that the Local Plan, in its current form, is not only unsound and undeliverable but also exposes the district to long-term socio-economic risks, environmental degradation, infrastructural collapse, and potential legal challenges due to procedural failings and statutory non-compliance.

This annex is intended to assist the Planning Inspectorate by illuminating these broader, interconnected factors—factors which, when viewed holistically, render the Local Plan fundamentally flawed, contrary to national objectives, and unfit for adoption without a complete change in approach. It underscores the urgent necessity for a comprehensive re-evaluation of HDC's spatial strategy with a duty to cooperate with other districts across Leicestershire, a genuine commitment to sustainable, infrastructure-led growth, and strict adherence to both the letter and spirit of national planning and environmental policy.

8.1.2 Erosion of Green Wedges, Settlement Identity, and Agricultural Land

HDC's Local Plan proposes expansive development within designated **Green Wedges**, areas that serve a vital strategic function within regional planning frameworks. Green Wedges are not merely open spaces; they are critical planning tools designed to prevent the merging of distinct settlements, protect the unique identities and heritage of rural communities, safeguard important landscape features, and maintain ecological corridors essential for biodiversity, climate resilience, and public well-being. Indeed, misallocation, assignment of area of separation and erosion of separation areas risks triggering incremental infill and speculative applications elsewhere.

The "Land South of Gartree Road" (Site References 8631, 8230, 8093) proposal blatantly disregards the clear and evidence-based recommendations set out in the **Harborough Green Wedge Assessment (2025)**. This assessment emphasizes the necessity of preserving open land between Oadby, Stretton Hall, and Great Glen to prevent urban sprawl, prevent coalescence and maintain the rural character that defines these areas ([Harborough Green Wedge Assessment, 2025](#)). HDC's proposed Local Plan ignores these established guidelines and sets a dangerous precedent, weakening long-standing policy protections and inviting further encroachment into safeguarded landscapes across the district. The Policies Map (Inset Map: 72, Land South of Gartree Road, document:

Local_Plan_A0_Landscape_Land_South_of_Gartree_Road_compressed) visually confirms that the SDA encroaches into land explicitly identified for safeguarding rural character and landscape distinctiveness. The Council's own Green Wedge Assessment (2025) reiterates that such zones play a pivotal role in maintaining ecological corridors, recreational space, and visual openness.



8.1.2.1 Loss of High-Grade Agricultural Land

Compounding this issue, the proposed development would result in the irreversible loss of well over **358.29 hectares of quality agricultural land** classified as versatile and productive under DEFRA guidelines. This land plays a critical role in supporting domestic food production—a priority of increasing national importance amidst global supply chain disruptions, geopolitical instability, and the escalating impacts of climate change. The permanent removal of such land undermines the UK's food security strategy, increases dependency on imports, and contradicts both national food security policies and NPPF which requires planning authorities to safeguard valuable agricultural resources.

This disregard is particularly concerning in light of increasing pressures on domestic food systems due to climate change, geopolitical instability, and supply chain disruptions. The **Harborough District Landscape Character Assessment (2024)** further highlights that this land contributes to the rural setting of adjacent conservation areas and heritage assets (FINAL_ACCESSIBLE__LCT_2_Elevated_Rolling_Farmland and FINAL_ACCESSIBLE__LCT_4_Settled_and_Farmed_Edge).

Moreover, agricultural land within Green Wedges contributes significantly to environmental sustainability by acting as carbon sinks, supporting diverse ecosystems, and providing natural flood management functions. By promoting development in this sensitive location, HDC is not only violating local planning policies but also undermining national objectives relating to environmental protection, food security, and rural preservation. The cumulative impact of this decision would resonate far beyond the immediate locality, eroding countryside protections district wide.

8.1.2.2 Dangerous Precedent

Allowing this development would set a precedent for further breaches of Green Wedge protections across the district, weakening spatial policies intended to control sustainable growth. This contravenes strategic aims outlined in both the Leicestershire Local Transport Plan (LTP4) 2025-2040 and the Harborough Local Plan Vision Statement, which emphasize protecting the environment and landscape integrity.

8.1.3 Climate Change, Biodiversity Loss, and Environmental Degradation

The proposed development on greenfield land is fundamentally incompatible with the UK's legally binding Net Zero 2050 commitments and broader environmental obligations under national and international frameworks. Such developments accelerate greenhouse gas emissions through deforestation, soil disruption, and construction, while simultaneously



eliminating vital carbon sinks essential for climate mitigation and encouraging the use of cars on ill-suited roads not designed to take the level of traffic.

The Harborough District Green and Blue Infrastructure Study (2024) identifies such areas as key biodiversity corridors, supporting numerous species, including those prioritised under the UK Biodiversity Action Plan. Fragmentation and destruction of these habitats will lead to a loss of biodiversity resilience, directly conflicting with national policy objectives to restore nature and create coherent ecological networks.

- The SDA entrenches a car-dependent settlement pattern, locking in long-term emissions due to a lack of sustainable transport infrastructure. Without viable alternatives, private vehicle use will dominate, exacerbating air pollution and undermining climate targets.
- The Harborough Air Quality Report (2024) acknowledges projected increases in nitrogen dioxide and particulate matter, particularly around sensitive ecological zones and residential areas impacted by additional traffic from developments like this.

The proposal also fails to comply with the Government’s 25 Year Environment Plan, which mandates net environmental gain (10% biodiversity net gain or 10% BNG) for new developments. The absence of a credible biodiversity net gain strategy highlights non-compliance with the Environment Act 2021.

The Harborough District Green and Blue Infrastructure Study – Final Issue (Dec 2024) confirms that only 5.1% of the district is woodland and a mere 0.02% is wetland. The proposed SDA will fragment critical biodiversity corridors, particularly along the River Sence and, potentially further afield, undermining the Local Nature Recovery Strategy and breaching duties under the Environment Act 2021.

Next, no credible Biodiversity Net Gain (BNG) strategy has been presented. The absence of effective Green and Blue Infrastructure, lack of tree and hedge preservation measures and secured off-site compensation or habitat enhancement measures places the Plan in direct conflict with statutory requirements.

The Harborough Air Quality Report (2024) predicts increased NO_x and NH₃ emissions from traffic generated by the Local Plan, especially near Cave’s Inn Pits SSSI and the Rutland Water SPA/Ramsar site. This breaches NPPF policy, which mandates avoidance of unacceptable environmental impacts. The **Habitats Regulations Assessment (HRA) – Jan 2024** also flags “likely significant effects” on protected European sites due to cumulative nitrogen deposition—issues inadequately addressed in mitigation proposals.

Despite this, HDC proposes a development form that amplifies emissions and seals greenfield land. In summary, the environmental consequences of this development span climate policy



breaches, biodiversity loss, air quality deterioration, and increased flood risks (next section) — placing HDC’s Local Plan in direct conflict with statutory duties and national sustainability commitments.

8.1.4 Flood Risk Escalation

Additionally, greenfield development significantly increases surface water runoff, elevating flood risks both on-site and downstream. This is particularly alarming given recent severe flooding in Great Glen (January 2025), which exposed vulnerabilities in existing drainage infrastructure. The **Climate Change Risk Assessment (Sept 2024)** identifies the Great Glen area, as highly sensitive to increased rainfall intensity, surface water flooding and Site 8631/Land South of Gartree Road’s Flood Risk Vulnerability level deemed to be “More Vulnerable” (8631_Site_Table_compressed), and heat stress. Additionally, surface water flood paths intersect proposed access routes, particularly near Great Glen and Burton Overy. The Plan lacks a deliverable Sustainable Drainage System (SuDS) framework or secured funding for flood alleviation, breaching NPPF policy.

Finally, no credible, funded flood mitigation strategy is provided in the Infrastructure Delivery Plan (2025), breaching NPPF Paragraphs 170-182 requirements for a sequential approach.

8.1.5 Socio-Economic Misalignment

HDC’s Local Plan demonstrates a profound and multifaceted disconnect between housing delivery strategies and the socio-economic realities of Harborough District. Rather than formulating a plan that addresses genuine local housing needs and fosters balanced, inclusive communities, the Council has opted to promote large-scale developments that are fundamentally unaffordable to the majority of existing residents. This approach risks deepening social exclusion, exacerbating economic inequality, and accelerating community fragmentation across the district.

- The proposed housing mix is disproportionately skewed towards market-rate properties designed to attract external investors, commuters from larger urban centres, and higher-income households. This focus sidelines key demographic groups essential to the fabric of local society—namely, key workers, young families seeking their first homes, and low-to-middle income households who are already struggling to access affordable housing options within the district.
- With the SDA on the Land South of Gartree Road’s site viability already classified as marginal (HDC Viability Report, Jan 2025), there is a clear and pressing risk that developers will aggressively negotiate reductions in affordable housing obligations. This mirrors the precedent set at Lutterworth East, where initial affordable housing quotas



were dramatically reduced from 40% to a mere 12% in order to make the scheme remotely commercially viable. Such outcomes not only undermine local policy aspirations but also directly contravene national policy objectives aimed at delivering genuinely mixed, balanced communities.

This socio-economic misalignment is further compounded by the geographical isolation of the proposed SDA from major employment centres. The lack of proximate job opportunities will impose significant commuting burdens on future residents, both in terms of time and financial cost. This will entrench car dependency, increase household expenditure on transport, and reduce overall disposable income—placing additional strain on working families and diminishing quality of life.

Moreover, the Plan fails to guarantee the timely delivery of critical social infrastructure. Schools, healthcare facilities, public transport links, and community amenities remain either unfunded, inadequately planned, or entirely speculative. Without these foundational elements, there is a real danger that the development will devolve into a disconnected, dormitory-style settlement lacking the social cohesion, services, and opportunities necessary to foster a thriving community. Residents could face years of under-provision, with essential services lagging far behind housing completions.

This approach represents a short-sighted and unsustainable model of growth that prioritises housing numbers over community well-being, social equity, and long-term economic resilience. It disregards the socio-economic fabric of Harborough District and fails to meet the holistic needs of its current and future residents.

In conclusion, the socio-economic strategy embedded within HDC’s Local Plan is fundamentally flawed. It neglects to provide affordable, accessible housing for those who need it most, fails to align housing growth with employment and infrastructure provision, and risks creating isolated enclaves that contribute little to addressing the real challenges facing the district.

8.1.6 Creation of a Dormitory Settlement

The **Development Strategy Paper (Feb 2025)** admits that the SDA on the Land South of Gartree Road lacks proximity to employment hubs, with most jobs concentrated in Leicester or Magna Park (Development Strategy Paper, Feb 2025, page 28, “The current focus for employment development is within and adjoining Market Harborough and Lutterworth”). This disconnect embeds long commuting patterns, disproportionately affecting low-to-middle income households who will face higher transport costs without corresponding wage growth.



8.1.7 Infrastructure Deficit and Public Services

Leicestershire faces deeply entrenched and escalating deficits in critical infrastructure sectors, notably healthcare, education, transport, and flood management. These deficiencies are well-documented and represent longstanding challenges that have been further exacerbated by population growth pressures and underinvestment. HDC's Local Plan fails to address these structural weaknesses, instead proposing developments that will significantly worsen existing shortfalls.

8.1.7.1 Healthcare Under Strain

GP provision is critically low at **41 per 100,000 people**, far below the nationally recommended safe operational threshold of 56 per 100,000. This shortage is already leading to extended waiting times, reduced patient access, and increased strain on NHS services across the district. The addition of thousands of new residents through large-scale developments like the "Land South of Gartree Road" SDA will place untenable pressure on an already overstretched healthcare system, with no secured funding or workforce strategy to expand provision.

8.1.7.2 Transport Network Failures

No committed funding exists for bypasses or junction improvements. Yet, the **South Leicestershire Joint Transport Evidence (2025)** identifies severe and unmitigated congestion risks, particularly along key corridors such as the A6, rural lanes, and critical junctions around Oadby, Great Glen, and Stretton Hall. The report highlights that there are currently **no funded solutions** or credible transport strategies in place to accommodate the projected increase in traffic volumes associated with the proposed developments. Without substantial investment in road upgrades, bypasses, and sustainable transport alternatives, residents will face gridlock, longer commute times, increased air pollution, and heightened road safety risks.

8.1.7.3 Flood Risk and Utilities

Flood defences across the district are demonstrably inadequate, as evidenced by multiple significant flooding events in recent years, including the major incident in Great Glen in January 2025. The proposed development areas include zones susceptible to surface water flooding and downstream flood risk exacerbation. The Plan provides no detailed, costed, or deliverable flood mitigation strategy, thereby exposing both new and existing communities to increased flood hazards, property damage, and insurance costs. Additionally, concerns about wastewater treatment capacity are noted highlighting that significant lead times and developer funding are not yet secured.

In addition to these headline infrastructure deficits, education provision remains critically under-addressed. Local schools are at or exceeding capacity, with no guaranteed delivery



timelines or funding agreements for new educational facilities. This risks leaving families without accessible schooling options, further eroding community cohesion and quality of life.

The cumulative effect of these infrastructure failings is that the Local Plan is rendered unsustainable and fundamentally flawed. By advancing significant housing growth without secured, deliverable, and timely infrastructure commitments, HDC is placing existing and future residents at risk of enduring degraded public services, diminished connectivity, and reduced resilience to environmental challenges. The pattern observed elsewhere where social infrastructure lagged years behind housing delivery—will likely be repeated, leading to under-served, fragmented communities.

8.1.8 Procedural Failures and Legal Risks

HDC's consultation process has been exclusionary, insufficiently transparent, and procedurally flawed, undermining the integrity of the plan-making process and eroding public trust. Effective consultation is a cornerstone of lawful and sound planning, ensuring that affected communities, statutory bodies, and key stakeholders are given meaningful opportunities to engage, provide input, and influence outcomes. Unfortunately, HDC has fallen short in several critical areas.

- The Council's over-reliance on digital platforms for disseminating consultation materials and collecting feedback has disproportionately marginalized elderly residents, individuals with limited digital literacy, and vulnerable populations without reliable internet access. This digital-only approach fails to meet standards of inclusivity and accessibility required under both national guidance and the **Equality Act 2010**, which mandates that public bodies must consider the needs of all sectors of society when conducting consultations.
- Furthermore, HDC failed to properly assess and present reasonable alternatives to its proposed spatial strategy. Notably, the well-documented and longstanding **WWRA proposal** for strategic development west of Leicester was neither adequately evaluated nor subjected to public consultation. This omission constitutes a breach of the National Planning Policy Framework (NPPF) requirements, which stipulate that Local Plans must be justified through clear evidence of consideration of reasonable alternatives. The Site Selection Methodology also fails to document any robust assessment of a distributed growth across smaller settlements identified in the **SHELAA (2024)**. This breaches NPPF policy, exposing the Plan to procedural challenge.
- The timing and communication of consultation stages were poorly managed, with limited publicity, inaccessible documentation formats, and insufficient timeframes for stakeholders to prepare detailed responses. Many residents were unaware of key



deadlines, and physical copies of documents were difficult to obtain, leaflets advising local residents of drop-in sessions explaining the proposed Local Plan were either not delivered or delivered after local events took place, further restricting participation.

These procedural deficiencies collectively expose HDC to significant legal risks, including potential challenges by way of Judicial Review. The failures represent non-compliance not only with consultation best practices but also with statutory obligations under the Equality Act 2010, the Local Planning Regulations, and principles of natural justice.

Such shortcomings jeopardize the legitimacy of the entire Local Plan process and risk rendering any adopted plan vulnerable to legal invalidation post-adoption, risking delays, reputational damage, and wasted public funds. It is imperative that proper, inclusive, and transparent consultation processes are followed to ensure lawful plan preparation.

8.1.9 Conclusion

This annex reinforces that Harborough District Council's Local Plan (2020-2041) is not only flawed at the strategic level but also undermined by deep systemic weaknesses across environmental, socio-economic, infrastructural, and legal dimensions: it is fundamentally unsound when rigorously evaluated against a wide array of critical benchmarks, including strategic coherence, environmental sustainability, socio-economic alignment, infrastructure deliverability, procedural integrity, and legal compliance.

The cumulative evidence presented throughout this document highlights systemic failures in HDC's approach to spatial planning, policy justification, and community engagement. This demonstrates:

- A reckless disregard for sustainable spatial planning.
- Non-compliance with core national policies, including the NPPF, Environment Act 2021, and Equality Act 2010.
- An over-reliance on speculative, undeliverable growth strategies.
- Procedural failings that erode public trust and expose the Council to litigation risk.

The proposed SDA on the Land South of Gartree Road epitomizes a model of development that is outdated, unsustainable, and disconnected from both local needs and national planning priorities. It lacks a credible foundation in terms of justification, is demonstrably undeliverable due to profound infrastructure and viability constraints, and stands in clear conflict with multiple aspects of national policy, including the National Planning Policy Framework, the Environment Act, and equality legislation.



Moreover, the Plan’s over-reliance on speculative, large-scale developments without secured infrastructure, its disregard for affordable housing delivery, its negative environmental impacts, and its flawed consultation process collectively render it incapable of achieving sustainable development outcomes. The risks posed by proceeding with the Plan in its current form include long-term socio-economic harm, environmental degradation, increased legal vulnerability, and erosion of public trust in the planning system.

Therefore, we respectfully submit that the **Planning Inspectorate** must:

1. **Reject the Plan in its entirety in its current form.**
2. Mandate removal of the **Land South of Gartree Road SDA.**
3. Require a transparent reassessment of spatial strategy, grounded in sustainability, infrastructure deliverability with robust infrastructure planning, environmental protection, and full statutory and procedural compliance and genuine community need.

Only through such fundamental revision can Harborough District hope to adopt a lawful, sound, and future-proof Local Plan.

8.2 **Appendix 2** – Additional Information on the Case Against the Proposed Land South of Gartree Road SDA and General Observations on HMG Policy

8.2.1 Introduction

The purpose of sharing this document is to:

- (i) **tactically**, underline to local communities the unreasonable timetable to rush through some of the core planning steps, de facto aiming to “rubber stamp things” without proper local consultation and what can they do to be intimately involved in the process, and
- (ii) **strategically**, to provide data and arguments to make the case again such developments in Parliament and feed an urgent public discourse as HMG is shifting new builds away from city centres (where new housing is actually needed) to the greenbelt and arable land around cities.

While the government argues that releasing green belt land is necessary to meet their 1.5 million homes target, it is clear that there are sufficient alternatives—particularly brownfield sites and vacant commercial properties—that can provide the new housing needed. Moreover, the proposed development would fail to deliver affordable housing, placing an unnecessary burden



on future residents by increasing travel costs and limiting access to essential services and employment opportunities. This proposal, as currently envisioned, represents a flawed and short-sighted approach to solving the housing crisis.

We hear regularly the Government won't shy from "taking *tough* decisions". It is clear tough decisions must be made. However, those must be "the *right* decisions".

Building on green belt, green wedge and farmland is certainly not "the right decision" on any sensible metric (energy, climate change impact, lack of local infrastructure, transport and services and required outsized additional investments needed to bolster them, food independence, etc, etc) and alternatives do exist (e.g. brownfield, commercial, empty housing stock). The HDC Local Plan does not meet the legal duty to demonstrate that it contributes to the mitigation of climate change (see *The Climate Crisis A guide for Local Authorities* <https://www.tcpa.org.uk/resources/the-climate-crisis-a-guide-for-local-authorities-on-planning-for-climate-change/>).

Of course, in the short term, focus is on what is being planned and the speed at which it is pushed through. Hence, the local community has set up a website with resources (template letters to Councillors, Harborough planning representatives, key short-term dates and more): <https://stopthenewtown.org>.

8.2.2 No Need for Green Belt/Green Wedge/Farmland Development to Meet Housing Targets

While the government has a target of building **1.5 million homes**, the release of green wedges and farmland, especially around Great Glen, Newton Harcourt, Stoughton, Thurnby, Houghton on the Hill and Stretton Hall, is not necessary to achieve this. According to data from the **Campaign to Protect Rural England (CPRE)**, **over 19,000 hectares of brownfield land** are available across England. This land is enough to provide more than **one million homes**. When combined with the **redevelopment of vacant commercial properties (and empty homes)**, which have become increasingly abundant due to changes in retail and work patterns, the total housing capacity can easily meet or exceed government targets without the need to build on protected green belt land.

8.2.3 Addressing Affordable Housing and Socio-Economic Disparities

8.2.3.1 *Affordability and the Nature of Housing on the Land South of Gartree Road SDA*

Together with lack of site financial viability (see elsewhere in this report), the proposed South of Gartree Road SDA would likely target higher-income buyers, given the area's desirability, rural charm, and potential for large, detached homes. Such homes will do little to address the **critical**



shortage of affordable housing in Leicester and the surrounding areas. The housing crisis in the UK is not merely about the total number of homes but about ensuring **affordable housing** for lower- and middle-income families. This development would instead attract wealthier residents, exacerbating existing inequalities in housing accessibility.

8.2.3.2 Alleviating Housing Shortages

Leicester City Council has reported a significant housing waiting list, with 6,682 households awaiting suitable accommodation as of April 2023.

By focusing on brownfield redevelopment within its boundaries, the city can increase housing supply where it's most needed, reducing waiting times and providing residents with appropriate living conditions.

8.2.3.3 Economic Disincentives for Low-Income Families

Even if affordable housing were included in the proposed Land South of Gartree Road SDA development, there are significant issues that would prevent low-income families from benefiting. Housing in areas distant from city centres or employment hubs often results in **higher travel costs**. Public transport in rural or suburban areas like the Land South of Gartree Road SDA is limited, leading to increased reliance on cars, which in turn raises living expenses for low-income families. For example, recent data show that commuting costs in rural areas can be up to **30% higher** than in urban centres.

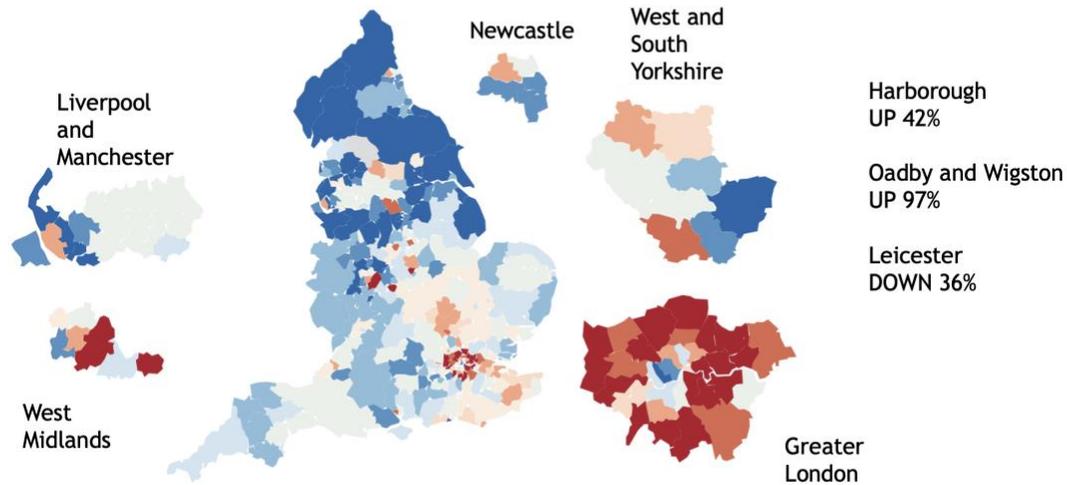
The **economic consequences** of building affordable housing far from employment centres include:

- **Increased strain on unemployment benefits:** Low-income residents may struggle to afford the cost of travelling to and from work, leading to higher reliance on government support.
- **Social filtering:** High travel costs act as a barrier for low-income families, effectively filtering them out of the affordable housing market in these areas. As a result, affordable housing built on the Land South of Gartree Road SDA site is unlikely to serve the population most in need.

In contrast, building **affordable housing** on brownfield sites and **in urban areas** would place residents closer to jobs, public transport, and essential services, reducing travel costs and increasing employment opportunities. Yet, for several large cities, HMG's current policy is precisely the opposite where Cities have decreased housing allocations and green wedges and farmland have increased allocations.



**% Change in housing target:
New formula compared to old**



Map: Neil O'Brien • Source: MHCLG, Outcome of the proposed revised method • Created with Datawrapper

Figure 11 - Changes in Housing Targets

Difficulties with urban regeneration can be overcome with the use of “Dockland Corporation”- style approaches which have yielded a number of successes in London, Manchester and elsewhere. Leicester City must consider such approaches to redevelop its own fabric and meet its own housing targets without promoting urban sprawl and overspill in surrounding areas.

8.2.4 Enhancing Social Cohesion

Addressing Leicester City's housing needs through the redevelopment of brownfield sites and underutilised commercial spaces within the city boundaries offers several advantages over expanding into greenfield areas. This approach not only meets housing demands but also fosters social cohesion, particularly in a diverse community like Leicester.

Redeveloping urban areas can strengthen community ties by:

- **Integrating Diverse Communities:** Urban redevelopment encourages mixed-use developments that bring together residents from various backgrounds, promoting interaction and understanding.
- **Addressing Racial Tensions:** Leicester has experienced racial tensions between communities of Pakistani and Indian origins. Urban redevelopment can help mitigate these issues by:



- **Creating Shared Spaces:** Developing communal areas such as parks, community centres, and markets encourages positive interactions among different ethnic groups.
- **Promoting Economic Opportunities:** Revitalised urban areas can attract businesses and create jobs, reducing economic disparities that often underlie social tensions.
- **Revitalising Neighbourhoods:** Improving existing urban spaces can instil pride among residents, leading to increased community engagement and reduced social tensions.
- Focusing on brownfield sites offers several advantages:
 - **Preserving Green Spaces:** By redeveloping existing urban areas, greenfield sites remain untouched, preserve trees and hedges, maintaining natural habitats and recreational areas.
 - **Utilising Existing Infrastructure:** Urban areas already have established infrastructure, reducing the need for new developments and minimising environmental impact.
 - **Stimulating Local Economies:** Urban redevelopment can attract investment, boost local businesses, and enhance property values, contributing to economic growth.

Prioritising the redevelopment of brownfield sites and underused commercial spaces within Leicester aligns with the city's housing needs and promotes social cohesion. This strategy addresses housing shortages, fosters community integration, mitigates racial tensions, and offers environmental and economic benefits, making it a more sustainable and harmonious approach compared to greenfield development.

8.2.4.1 Case Study: Harborough District Council's Approach to Strategic Development Areas — A Focus on Land South of Gartree Road (SDA) and Travelling Showpeople Allocation Missteps

8.2.4.1.1 Overview

This case study highlights the significant shortcomings in Harborough District Council's (HDC) methodology when proposing Strategic Development Areas (SDAs), using the Land South of Gartree Road (Site 24/8631) as a prime example. Specifically, it examines HDC's flawed allocation of this site for Travelling Showpeople (TSP) use, exposing a broader pattern of inadequate planning, lack of detail, and failure to meet national and local policy standards.

Through this analysis, it becomes evident that HDC's approach not only jeopardises sustainable development principles but also places communities, infrastructure, and the environment at unnecessary risk.



8.2.4.1.2 The Flawed Allocation of Site 24/8631: A Symbol of Poor Strategic Planning

Harborough District Council allocated Site 24/8631 within its emerging Local Plan as part of a Strategic Development Area (SDA), proposing it for Travelling Showpeople (TSP) use. However, this decision exemplifies a **flagrant lack of detailed assessment, disregard for fundamental planning considerations and lack of adequate considerations when thinking about enhancing social cohesion.**

Key Failures:

8.2.4.1.2.1 1.1 Highway Safety Ignored

- **Unsafe Access Points:**

- London Road, a narrow rural route with dangerous bends, was proposed as a primary access point without any detailed transport assessment or mitigation strategy.
- Chestnut Drive, a residential street, was suggested for secondary access, despite being wholly inappropriate for large commercial vehicles.

- **No Demonstrable Engagement with Local Highway Authority (LHA):**

- HDC failed in its duty to cooperate, neglecting to involve the LHA in critical infrastructure planning.

8.2.4.1.2.2 Environmental and Landscape Oversights

- The site sits at an elevated, visually sensitive location, yet no landscape impact assessment was provided.
- Noise implications from TSP activities, such as equipment testing, were entirely overlooked.
- Mature trees and hedgerows with potential Tree Preservation Orders (TPOs) were left unprotected due to absent or vague policy conditions.

8.2.4.1.2.3 Ignoring Established Policy and Assessment Frameworks

- HDC bypassed clear "showstopper" criteria set out in its own commissioned Gypsy & Traveller and Travelling Showpeople Site Assessment (Three Dragons, Nov 2024).
- The **site's access constraints alone should have disqualified it at Stage 2** of the assessment process.

8.2.4.1.2.4 Disregard for Community Feedback and Planning History

- A 2019 hybrid planning application (**19/00862/OUT**) on this land was withdrawn following over **225 public objections** related to traffic, environmental harm, and amenity impacts.
- HDC failed to incorporate these clear signals from past consultations into its SDA proposals.



8.2.4.1.3 The Broader Pattern: HDC's Strategic Development Approach Under Scrutiny

The case of Site 24/8631 reflects systemic issues in how HDC approaches SDAs:

- **Lack of Evidence-Based Planning:**
 - Critical infrastructure, environmental, and community considerations are sidelined in favour of broad, unchecked allocations.
- **Failure to Maximise Existing Resources:**
 - The Three Dragons report explicitly highlights that several existing TSP sites across the district remain underutilised, with vacant plots readily available.
 - Despite this, HDC pursued new allocations without justification, contradicting sustainable development principles and Policy 6.11 (Page 32 of the Three Dragon report), which emphasises making full use of existing sites first.
- **Superficial Policy Compliance:**
 - While citing policies like HSG-NLP 7 and HN06, HDC's practical application demonstrates a disregard for the substantive requirements of safe access, environmental protection, and deliverability.

8.2.4.1.4 3. A Better Model: The Case for Site 24/12227 (Mere Lane, Lutterworth)

In stark contrast to the flawed Gartree Road SDA allocation, Site 24/12227 illustrates how strategic planning **should** be conducted:

- **Integration with Existing TSP Community:**
 - The site extends a well-established TSP area, supporting community cohesion.
- **Robust Transport Infrastructure:**
 - Immediate access to the M1, M69, and A5 ensures safe, efficient movement for large vehicles.
- **Alignment with Policy 6.11:**
 - Utilises available capacity within existing frameworks, avoiding unnecessary land take and environmental impact.
- **Deliverability and Sustainability:**
 - The site is both practical and achievable within the plan period, addressing genuine need without overreaching.

8.2.4.1.5 4. Conclusion: Lessons from HDC's Gartree Road Misstep

The Land South of Gartree Road SDA highlights a concerning trend in HDC's strategic planning—characterised by insufficient detail, lack of infrastructure foresight, environmental neglect, and poor stakeholder engagement.

To uphold sound planning principles, it is imperative that:



1. **Site 24/8631 is removed** from TSP allocation within the Local Plan.
2. HDC re-focuses on sustainable, evidence-based solutions like **Site 24/12227**, ensuring alignment with national policy, local needs, community expectations and **enhancing social cohesion**
3. Future SDA proposals from HDC must be underpinned by rigorous technical assessments, genuine stakeholder collaboration, and a commitment to optimising existing resources before pursuing expansive new developments.

This case study serves as a critical reminder that strategic development demands strategic thinking—not broad-brush allocations lacking the necessary detail to ensure safe, sustainable, and community-sensitive growth.

8.2.4.1.6 References

- Harborough District Council "Gypsy & Traveller and Travelling Showpeople Site Assessment" (November 2024) – Pages 23, 24, 27, 49.
- HSG-NLP 7 Document.
- Policy H6 (HN06) – Gypsy, Traveller, and Travelling Showpeople Accommodation.
- Planning History Reference: 19/00862/OUT.

8.2.5 Energy Efficiency and Carbon Footprint: Why Dense Urban Developments Are Superior

Tight, higher-density developments in existing urban environments offer significant energy efficiency and sustainability advantages compared to suburban sprawl. Research from **RIBA** indicates that urban developments, especially apartment buildings and high-density housing, consume **40% less energy** per capita compared to suburban homes. This is largely due to:

- **Shared resources** (e.g. district heating and better insulation in multi-unit buildings).
- **Proximity to services and employment**, which reduces the need for long commutes and car usage.

The development on the Land South of Gartree Road SDA will result in increased car dependency and commuting due to the lack of public transport infrastructure. This undermines the UK's **net-zero carbon emissions goal** by increasing both construction-related and transportation-related carbon footprints. Furthermore, suburban homes typically consume more energy for heating and cooling due to their detached nature and lower efficiency.



8.2.6 Environmental Impact: Climate and Biodiversity Concerns

Building on green wedge and farmland such on the Land South of Gartree Road SDA contradicts the government's climate commitments and threatens local biodiversity:

- **Loss of Carbon Sinks:** The destruction of green fields and woodlands eliminates natural carbon sinks, contributing to climate change. The government's net-zero ambitions by **2050** are fundamentally at odds with such developments.
- **Biodiversity Loss:** removal of green wedges and farmland increases habitat loss and fragmentation. According to **Natural England**, the UK has already lost a significant portion of its biodiversity, and further development in the countryside will accelerate this trend.

In contrast, brownfield development can incorporate **green building techniques**, such as rooftop gardens and renewable energy infrastructure, while avoiding further destruction of natural ecosystems.

8.2.7 Impact of Housing Development on UK Food Security and Arable Farmland, and UK Energy Security

Implications for UK Arable Farmland and Food Security The development of new housing on greenbelt and green wedge land in England often involves the conversion of arable farmland into residential areas. The amount of farmland lost per new house varies depending on housing density and land use patterns.

- **Housing Density:** In England, housing densities can range from 30 to 50 dwellings per hectare (dph) in suburban areas. At 30 dph, each dwelling occupies approximately 333 square meters (0.0333 hectares). At 50 dph, each dwelling occupies about 200 square meters (0.02 hectares).
- **Farmland Loss per House:** Assuming an average density of 40 dph, each new house would result in the loss of approximately 250 square meters (0.025 hectares) of arable farmland.

8.2.7.1 Case Study: Land South of Gartree Road SDA

Using data from HDC in terms of surface, the site would see a total Farmland Loss of 358.29 hectares of arable farmland converted to residential use.



Implications for UK Food Security

The conversion of arable land to residential use can impact the UK's food security:

- **Reduced Agricultural Land:** The loss of farmland decreases domestic food production capacity, potentially increasing reliance on imports.
- **Food Security Concerns:** The UK produces about 60% of its food. Further reduction in arable land could exacerbate food shortages, especially during global supply disruptions, [The Times](https://www.thetimes.co.uk/article/farmers-food-shortages-green-schemes-protests-0j6hwls9) (<https://www.thetimes.co.uk/article/farmers-food-shortages-green-schemes-protests-0j6hwls9>) .

8.2.7.2 Implications for UK Energy Security

Developing greenbelt, green wedge and farmland can also affect energy security:

- **Increased Energy Demand:** New housing developments increase energy consumption.
- **Infrastructure Strain:** Extending energy infrastructure to new developments can strain existing resources and increase emissions.

8.2.7.3 Comparison of Food and Energy Security with Other Countries

The UK's food and energy security can be compared with other nations:

- **United States:** High levels of both food and energy security due to vast natural resources and agricultural output.
- **France and Germany:** Strong food security with significant agricultural sectors; energy security varies, with both countries transitioning to renewable sources.
- **Russia and Ukraine:** Major global food producers; energy security is high in Russia due to vast fossil fuel reserves, while Ukraine's energy security has been compromised by conflict.
- **China:** Faces challenges in food security due to population size; energy security is improving with investments in renewables but still relies heavily on coal.
- **Japan:** Limited arable land leads to high food import dependence; energy security is a concern due to reliance on energy imports and the aftermath of the Fukushima disaster.

In summary, the development of housing on farmland on the Land South of Gartree Road SDA will result in the loss of approximately 350 hectares of arable farmland, potentially impacting the UK's food and energy security. Comparatively, the UK faces more significant challenges in these areas than countries like the Germany, France and the US.



8.2.8 Infrastructure Deficiencies: Burden on Public Services

The proposed development on the Land South of Gartree Road SDA lacks the necessary infrastructure to support the influx of thousands of new homes. Local healthcare, schooling, and public transport networks are already under strain. Without significant investment, these services will become overwhelmed, leading to reduced quality of life for both new and existing residents.

- **Healthcare:** As previously noted, NHS services in Leicester, particularly dental care, already have long waiting lists, and people experience severe difficulties seeing GPs already. The hospitals are at maximum capacity. Thousands of additional residents would only exacerbate this problem.
- **Education:** Local schools are likely to become overcrowded, impacting the education of local children. Building in existing urban areas allows for better integration with current school networks and services.
- **Transport:** The reliance on cars in suburban developments like the Land South of Gartree Road SDA would increase traffic congestion and air pollution. Building on brownfield sites within cities would encourage the use of public transport and reduce car dependency. The A6 towards Leicester is already beyond capacity in the mornings and a significant increase in traffic volume cannot be accommodated.

8.2.9 Alternative Solutions: Brownfield and Urban Redevelopment

The focus should be on redeveloping **brownfield sites** in Cities and repurposing **vacant commercial properties** within urban areas. This strategy offers several benefits:

- **Reduced environmental impact:** No destruction of green spaces, biodiversity, or natural carbon sinks.
- **Energy efficiency:** Dense, urban developments are more energy-efficient and closer to employment hubs, reducing travel-related emissions.
- **Economic revitalisation:** Urban regeneration can breathe new life into underutilised areas, increasing economic activity, and creating jobs.
- **Lower infrastructure costs:** Developing in urban areas utilises existing infrastructure (roads, schools, healthcare facilities), reducing the need for costly new infrastructure.

The government should prioritise **brownfield redevelopment** and the conversion of **vacant commercial properties** to meet housing needs. This approach aligns with legal, environmental, and economic priorities, delivering housing in a sustainable and responsible manner.



8.3 Appendix 3 – Deeper Dive into Green House Gas Emissions

When evaluating the carbon emissions associated with housing development, it is essential to consider not only the construction of the dwelling itself but also the infrastructure required to support it and the operational emissions resulting from its location. Below is a comparative analysis of three scenarios: (i) constructing a new house on a greenfield site, (ii) constructing a new house on a brownfield site, and (iii) redeveloping an existing house.

8.3.1 Comparative Analysis of Carbon Emissions

Aspect	Greenfield Development	Brownfield Development	Redevelopment of Existing House
Embodied Carbon in Construction	34.6 to 80 metric tonnes CO ₂ e (UK Construction Media , MIT Climate Dynamics)	Similar to greenfield, but may vary depending on site remediation needs (AECOM)	Approximately half of new construction, as major structural elements are retained (AECOM)
Infrastructure Development	Requires new roads, utilities, and services, leading to additional emissions (AECOM , Carnegie Mellon University)	Utilises existing infrastructure, reducing the need for new construction (AECOM)	Minimal additional infrastructure required, leveraging existing services (AECOM)
Operational Emissions (Transportation)	Higher due to increased reliance on personal vehicles; estimated 32-57% more CO ₂ per capita (AECOM , Smart Cities Dive)	Lower due to proximity to public transport and amenities (AECOM , Smart Cities Dive)	Lowest, as existing urban settings often offer multiple low-emission transport options (AECOM)
Operational Emissions (Building Use)	Dependent on building standards; potential for high emissions if not energy-efficient	Similar to greenfield; can be mitigated with modern building practices	Potentially lower if energy efficiency measures are implemented during renovation (AECOM)
Land Use Impact	Converts undeveloped land, potentially affecting ecosystems and carbon sequestration (AECOM , CPRE)	Reclaims previously used land, minimising impact on natural habitats (AECOM , CPRE)	No additional land use; preserves existing green spaces (AECOM)



8.3.2 Case Against Farmland, Green Wedge and Green Belt Development in the Context of the Climate Emergency

Developing housing on greenfield sites is counterproductive for councils committed to addressing the climate emergency for several reasons:

1. **Higher Carbon Emissions:** Greenfield, green wedge and farmland developments necessitate the creation of new infrastructure, leading to increased embodied carbon emissions. Additionally, their often remote locations result in higher operational emissions due to greater reliance on personal vehicles. Studies have shown that brownfield redevelopment produces 32-57% less CO₂ and other air pollutants per capita compared to greenfield development ([AECOM](#), [Smart Cities Dive](#)).
2. **Loss of Natural Carbon Sinks:** Greenfield, green wedge and farmland sites often comprise undeveloped lands that act as carbon sinks. Developing these areas disrupts their ability to sequester carbon, exacerbating atmospheric CO₂ levels. Preserving greenfield land is crucial for maintaining biodiversity and natural carbon absorption ([AECOM](#), [CPRE](#)).
3. **Infrastructure Strain:** Extending services such as water, electricity, and sewage to greenfield sites requires significant resources and energy, leading to further emissions. In contrast, brownfield sites typically have existing infrastructure that can be upgraded, reducing the need for new construction ([AECOM](#)).
4. **Encouragement of Urban Sprawl:** Greenfield, green wedge and farmland development promotes urban sprawl, leading to inefficient land use and increased transportation emissions. This sprawl often results in longer commutes and greater energy consumption, undermining efforts to reduce carbon footprints ([AECOM](#), [CPRE](#)).
5. **Missed Opportunities for Sustainable Development:** Brownfield sites offer opportunities for sustainable redevelopment, including the integration of renewable energy sources, green corridors – areas that are landscaped to promote more biodiversity and provide natural shade for urban areas – to reduce heat levels through a process called evapotranspiration and cut air pollution and energy-efficient building practices. Utilizing these sites aligns with climate goals and revitalizes urban areas ([AECOM](#), [World Economic Forum](#)).

In conclusion, prioritising brownfield redevelopment and the renovation of existing structures aligns with climate action objectives by minimising carbon emissions, preserving natural landscapes, and promoting sustainable urban growth. Councils committed to combating the climate emergency should focus on these strategies rather than greenfield development.



8.4 Appendix 4 – Deeper Dive into Energy Use

8.4.1 Energy Use, Construction and Infrastructure

Developing new housing on Greenfield, green wedge and farmland land involves several energy-intensive processes that can impact the UK's energy security. These processes include:

8.4.1.1 *Construction Energy Consumption:*

- **Embodied Energy in Building Materials:** The production and transportation of construction materials such as concrete, steel, and bricks are energy intensive. For instance, constructing a typical three-bedroom house in the UK can result in embodied carbon emissions ranging from 34.6 to 80 metric tonnes of CO₂ equivalent.

Designing Buildings

- **Infrastructure Development:** Building new infrastructure—roads, communication networks, sewage systems, schools, retail centres, and entertainment facilities—requires substantial energy input. The embodied energy for these developments adds to the overall energy demand.

8.4.1.2 *Operational Energy Consumption:*

- **Heating and Cooling:** New homes will require energy for heating, cooling, and other daily operations. If these homes are not built to high energy efficiency standards, their operational energy consumption can be significant. In addition, less dense population invites less energy efficiency as buildings have more outside walls and require more energy per capita to maintain adequate heat/cooling levels.
- **Transportation:** Developments on greenbelt land lead to increased commuting distances, resulting in higher energy consumption for transportation. This is particularly relevant if public transport options are limited, leading to greater reliance on personal vehicles.

8.4.1.3 *Cumulative Energy Demand:*

- **Increased Energy Load:** The combined energy requirements for construction, infrastructure development, and ongoing operations contribute to a higher overall energy demand. This increased demand can strain existing energy resources and infrastructure.

Impact on Energy Security:

The additional energy consumption associated with greenbelt development can have several implications for energy security:



- **Resource Strain:** Higher energy demand necessitates increased energy imports or the expansion of energy production facilities, which can be resource-intensive and have damaging environmental consequences.
- **Infrastructure Pressure:** Existing energy infrastructure requires upgrades or expansions to accommodate the increased load, leading to further energy expenditure, capital expenditure and disruptions during construction phases.
- **Environmental Impact:** Increased energy consumption leads to higher greenhouse gas emissions, counteracting efforts to mitigate climate change and impacting long-term energy sustainability.

8.4.1.4 **Conclusion:**

Developing new housing on Greenfield, green wedge and farmland entails significant energy consumption across various stages—from construction to daily operations. This increased energy demand can strain the UK's energy resources and infrastructure, posing challenges to energy security and sustainability goals. Therefore, careful consideration of energy-efficient building practices and infrastructure planning is essential to mitigate these impacts.

8.4.2 Energy Use and Population Density

The relationship between population density and energy consumption is a critical factor in urban planning and sustainability. Several studies have demonstrated that higher population densities in urban areas often correlate with lower per capita energy use, primarily due to more efficient infrastructure and reduced transportation needs.

8.4.2.1 **Energy Use vs. Population Density:**

Cities with higher population densities tend to have lower per capita transport energy consumption and overall energy consumptions.

The relationship between population density and per capita energy consumption in the UK has been explored in several studies, highlighting that higher urban densities often lead to reduced energy use per person. Notable research includes:

“Urban and Rural—Population and Energy Consumption Dynamics in Local Authorities within England and Wales” by Hadi Arbabi and Martin Mayfield (2016):

- This study examines energy consumption patterns across 346 Local Authority Units in England and Wales, analysing domestic and transport energy use relative to population density. Findings indicate that urban areas with higher population densities exhibit lower per capita energy consumption, particularly in the domestic sector. The research



highlights the efficiency benefits of denser urban forms in reducing energy demand. [Link to study](#)

“Impact of Population, Age Structure, and Urbanization on Carbon Emissions/Energy Consumption: Evidence from Macro-Level, Cross-Country Analyses” by Brantley Liddle (2014):

- Although this study encompasses multiple countries, it provides valuable insights into how urbanization and population density influence energy consumption. The research suggests that increased urban density can lead to reduced, per capita, energy use due to factors like improved public transportation and more efficient infrastructure. [Link to study](#)

“Population and Energy Consumption/Carbon Emissions: What We Know, What We Don’t Know, and Why It Matters” by Brantley Liddle (2021):

- This chapter reviews existing literature on the demographic determinants of energy use and carbon emissions, including the effects of population density. It discusses how higher densities can lead to energy efficiencies, particularly in transportation and residential energy use, by facilitating better public transport systems and reducing the need for extensive infrastructure, [Link to chapter](#)

8.4.2.2 Implications for Urban Planning:

Understanding the inverse relationship between population density and energy consumption is essential for developing sustainable urban environments. Promoting higher-density developments can lead to significant energy savings and reduced greenhouse gas emissions.

These studies underscore the importance of considering population density in efforts to reduce energy consumption and promote sustainable development.

8.5 What is StopTheNewTown.org (STNT)

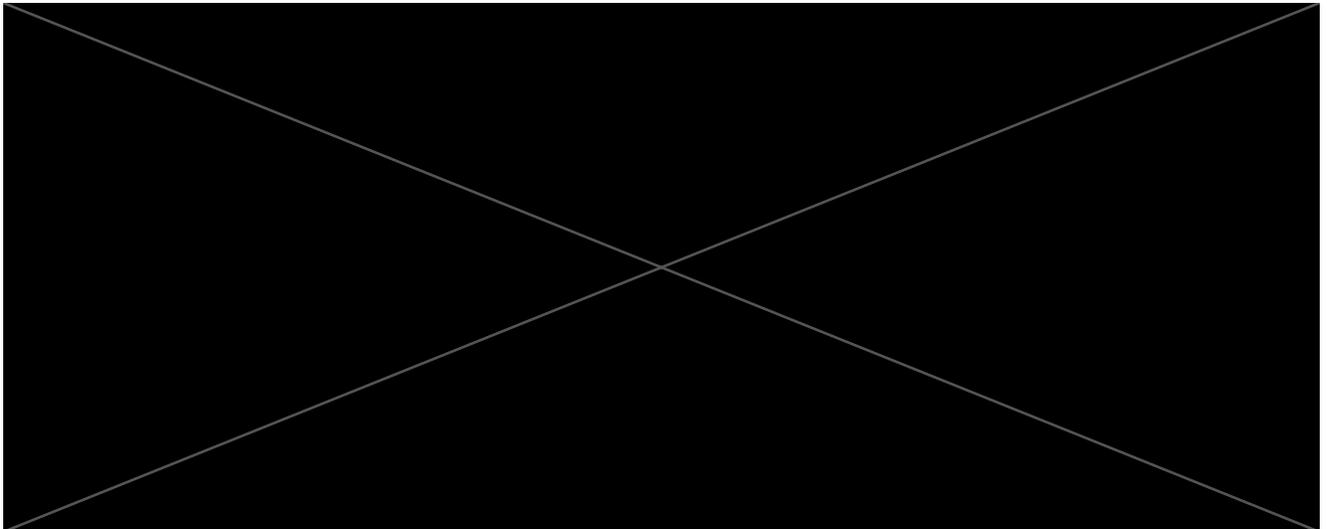
StopTheNewtown.org, STNT for short, is made of volunteers who are residents from Great Glen, Oadby, Stretton Hall, Kibworth, Blaby district with others from other surrounding areas. STNT is **not** a political group in any way, shape or form. By doing this work, we aim to show we are neither NIMBYs nor BANANAs (Build Absolutely Nothing Anywhere Never At all) with considered responses to the proposed local plans which we fundamentally disagree with for the reasons set out in this document.



8.6 Appendix 5 – Table of Signatories

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Photograph of a part of the green wedge and farmland area where the proposed Land South of Gartree Road SDA is slated to be constructed.

