

Our Ref: **NH/25/10331**

Your Ref:

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Via Email: localplan@harborough.gov.uk

Dear Sir/Madam,

Harborough Local Plan 2020-241 – National Highways Response

National Highways (NH) welcomes the opportunity to comment on the Harborough Local Plan 2020-2041 ahead of upcoming public consultations. The document outlines the needs and opportunities that Harborough District is currently facing and what the Local Plan aims to achieve by 2041.

NH has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner for national economic growth.

In relation to the Harborough District, NH's principal interest is ensuring the safe and efficient operation of the SRN, notably the M1, A6, and A47 Corridors.

In responding to Local Plan consultations, we have regard to the National Planning Policy Framework (NPPF) and DfT Circular 01/2022 – Strategic Road Network and the delivery of Sustainable Development (“the Circular”), which sets out how interactions with the SRN should be considered in the making of local plans. Paragraph 26 of the Circular sets out that:

‘The NPPF prescribes that transport issues should be considered from the earliest stages of plan-making and in development proposals so that sustainable transport can be promoted. In relation to the preparation of local plans and spatial development strategies, the government expects that the relevant authorities will engage with the company from the outset of this process to understand the interaction between land use designations and the impacts on road safety and the future performance of the SRN.’

Based on our review of the Harborough Local Plan 2020-2041 document, reports and other supporting documents, we have identified the items below where further information is required to help support the development of the draft plan.

With regard to transport, the Regulation 19 (Proposed Submission) consultation document proposes a vision that includes transport infrastructure developed for each new community alongside sustainable travel options. We have undertaken a policy review to identify the sites which may have an impact on the operation of the SRN.

Policy DS01 sets out the requirement for the delivery of 13,182 houses in the Harborough District between 2020-2041. Leicester City's unmet housing and employment needs have been appointed to surrounding districts, including the Harborough District, increasing the yearly housing requirement by 123 houses. The allocation of housing has been focused predominantly on Leicester Urban Area and Market Harborough due to existing or potential accessibility to public transport.

The following areas are allocated for housing in the vicinity of the SRN:

- Leicester Urban Area
- Market Harborough
- Lutterworth
- Kibworth
- Great Bowden
- Great Glen
- Houghton on the Hill

In principle, NH welcomes developments within existing urban areas; trips generated by developments may use sustainable transport options or remain internal to the town, resulting in a smaller impact on the wider SRN than developments in alternative locations.

Nevertheless, larger key sites still must be considered on their own merit and assessed accordingly to consider their impact during the construction and operational phases. However, the district only has one rail station located in Market Harborough. Therefore, the construction and operational phases of these developments will likely rely on the SRN and LRN.

The following sites are considered a potential concern with regard to the SRN:

- OA1 (1,200 houses and 5ha of employment land)
- TB1 (125 houses)
- MH1 (250 houses)
- MH2 (850 houses)
- MH3 (600 houses)
- S1 (950 houses)
- GG1 (400 houses)
- K1 (475 houses)
- MP1 (15.8ha strategic warehousing)
- MP2 (122ha strategic warehousing)

NH have highlighted these due to the size and proximity to the SRN and therefore we would like to see the evidence base for these sites and any plans for mitigation of the SRN from impacts generated by these developments.

Site OA1, Land South of Gartree Road, is associated with policy SA02. The policy sets out transport aspects that must be adhered to, including comprehensive sustainable transport links, impacts on the wider strategic and local highways must be mitigated, and a frequent zero-carbon bus service. We support the development of sustainable transport links to encourage trips to be made using sustainable methods and, therefore, alleviate pressure posed by the new development on the SRN.

Policy DS02 allocates land for employment in the district. The need for larger strategic distribution spaces to support the growing logistics sector in Leicester has been realised. The policy focuses on the additional provision of employment land at Magna Park due to the access to the SRN via Junction 20 of M1.

We recognise that an expansion of employment land at Magna Park and the allocation of 320 houses at Lutterworth, mitigation of this development on Junction 20 of the M1, will need further assessment. The policy requirements of SA01 for land at Mere Lane, Magna Park (122 ha of land type B8), include a transport assessment to inform the development of appropriate highway mitigation that should be provided. This requirement appropriate.

Policy DS05 details how infrastructure required to mitigate the impact of the allocated developments can be phased in time or geographically and delivered through the use of planning conditions. The policy also underlines the continued cooperation with National Highways to reduce transport impacts of development, including the use of Transport Strategies. We would like to gain an insight into the proposed schedule of improvements required on the SRN due to development.

DM06 of the development standards policies ensures that new developments are designed to support transport networks. Additionally, the policy ensures that larger developments and those with high trip-generations consider and mitigate their impact on the wider transport network.

Any potential sites identified in the Local Plan process, which is expected to have an impact on the SRN, should be subject to consultation with NH and assessed while regarding the DfT's Circular 01/2022 to determine the extent of their potential impacts on the SRN. Additionally, the cumulative impact of proposed site allocations should be undertaken in line with the Circular to understand traffic impacts on the SRN. This is in terms of capacity, safety, and identifying any possible mitigation measures (if required).

Infrastructure Delivery Plan (2025)

The Infrastructure Delivery Plan (IDP) is noted as key related evidence in Appendix 2 for policies DS05, SA01, and the general Local Plan. The plan aims to ensure that investment decisions are based on a sound understanding of infrastructure capacity and future needs. A Local Transport Study commissioned by Leicestershire County Council (LCC) used strategic modelling that identified strategic transport impacts and mitigation measures that would arise from Local Plan growth.

The IDP states that since the production of the Stage 1 Report, analysis published by Midlands Connect in July 2024 shows that the A5/A426 Gibbett Hill junction is nearing its operational capacity, reaching 98% capacity every morning, resulting in long queues and lengthy delays. It recognises the A5 corridor to be one of the Midlands' most important east-west connections and states that an intervention is urgently needed to ensure the route functions for residents, businesses and commuters and does not stifle future economic growth. According to the IDP, the route is managed by National Highways and LCC, along with other partners, who *“are fully supportive of the call for improvements to be identified, funded and delivered.”* NH currently has no commitments to funding the improvement of this route, and therefore, reference to this should be removed.

In relation to 90 dwellings being proposed at 'Land at M1 Junction 20/Swinford Road', the IDP notes that *“the allocation at M1 Junction 20 / Swinford Road in Lutterworth (site reference L2)*

is not expected to have an adverse highways impact though access into the site may be constrained by its location". The document states that "*no capacity increase to the M1 mainline or Junction 20 is required or forecast by National Highways*". NH disagrees with this statement. We would need to see the evidence and agree a suitable way forward if or when this site comes forward.

The Land South of Gartree Road was recognised as the most significant allocation, with 1,200 homes and 5 hectares of employment land allocated. Access to this site is from London Road via the A6 and B582 Gartree Road, which has no walking or cycling provisions. The sites at Scraftoft form extensions to the existing urban areas; however, bus priority on the A47 does extend far enough to these sites. NH requests we are consulted early on this site to review the evidence base and agree any mitigation if required.

Further, Land West of Warwick Road, Kibworth, is proposed to accommodate 475 units within the vicinity of the A6. This site would be accessed from Warwick Road immediately west of a narrow, signal-controlled bridge over the rail line.

The IDP states that measures will likely be required to manage the A6 corridor through Kibworth. This may be that a contribution towards transport infrastructure or delivery of off-site mitigation will be required from the growth sites. NH requests that if there are any mitigations measures proposed, these would need to be reviewed and approved. NH would also like to understand any interlinkages between all schemes, especially those on the periphery of Leicester City, as there are potential risks of additional pressures on the A6 and A47 routes into the city.

The IDP stresses that masterplans will be essential for the delivery of these Local Plan developments to ensure safe and suitable access, manage traffic impacts and deliver the developments in a sustainable way. Evidence from the Strategic Transport Assessment, 2025, indicates highway mitigation options and the indicative cost of these options. NH would like to gain a better understanding of the proposed mitigation opportunities for the SRN and what mitigation measures will be considered in these development masterplans.

South Leicestershire Joint Transport Assessment Stage 1

Whilst the Leicestershire Transport Assessment (TA) and its associated modelling includes the Harborough area, the local modelling for Harborough also requires approval from NH on an independent basis.

The TA has recognised through transport modelling that Lutterworth (M1 J20) is a key impact area. The TA notes there is a lack of connectivity to the SRN (e.g., M1) from North of Lutterworth. Due to this lack of connectivity, strategic trips are passing through Lutterworth. A potential strategic intervention suggested in the TA includes a new M1 Junction to the north of the Lutterworth in the long term (from 2041 onwards). Creation of a new access on the SRN is contrary to DfT Circular 01/2022. Therefore, we require further information and justification in support of this conclusion.

NH welcomes continuous engagement with Harborough District Council, especially concerning the significant amount of allocated development set out in this new Local Plan. NH is particularly interested in the type of mitigation from the impacts of the development on the SRN. This includes the schedule of any development regarding mitigation of the SRN and the funding of any construction and maintenance.

A concern of NH is the lack of a plan for mitigation of cumulative development on the SRN. NH accepts the method of multiple Transport Assessments provided by developers, but this may lead to inappropriate mitigation measures being put in place. Therefore, NH would like a more inclusive plan for mitigation measures for all proposed developments that would have an impact on the SRN.