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Regulation 19 Harborough District Council Local Plan Representations

MAY 2025

Q200380

Contents

1 Introduction

1.1 This document provides representations prepared on behalf of Urban&Civic ('U&C') and Homes England ('HE') to Harborough District Council ('HDC') Regulation 19 Local Plan ('Reg 19 Plan') and its associated evidence base.

1.2 The Site is being promoted by landowners Homes England and Urban&Civic ('The Development Partners'). Urban&Civic plc is wholly owned by the Wellcome Trust. The Development Partners hold separate interests in the land but have been working together to plan for the site including appointing a joint technical team.

1.3 The Development Partners intend to bring forward the site together with formal legal arrangements to ensure that it is developed as a coherent whole supported by necessary infrastructure and placemaking.

1.4 This representation forms a single representation from the two landowners but they would like to reserve the right to both attend and speak at the examination should the format permit that, and the Inspector's issues and questions be relevant to the specific issues of each party.

1.5 These representations reflect engagement and ongoing discussion with HDC, Oadby and Wigston Borough Council ('OWBC'), Leicestershire County Council ('LCC') and their advisors with respect to the Site Allocation – SA02 - Land South of Gartree Road ('LSGR'). The site straddles the boundaries of HDC and OWBC and it is intended that the final adopted policy will be a shared one.

1.6 Separate representations have been made on the Reg 19 OWBC Local Plan policy AP5, which is very similar but not identical to the SA02 policy in this plan. Further representation will be made if, as is likely, a further draft is published prior to submission. These representations duplicate some of the response to the OWBC draft plan but expand in a number of areas where further evidence has been published to support the Draft Policy, and where LCC has responded on certain matters.

1.7 U&C and HE are strongly supportive of the proposed allocation and the general direction of the policy, including the capacity for 4,000 homes, the focus on infrastructure-led development and the importance of high quality design, protecting and enhancing the natural environment and historic assets. Our representations focus on ensuring that the policy meets the 'Soundness Tests' set out in paragraph 36 on the National Planning Policy Framework ('NPPF'), and in particular making sure it is ***deliverable*** in the plan period and therefore ***'effective'*** and contributes to meeting the Authorities' objectively assessed needs for housing.

1.8 Draft Policy SA01, confirms that several site allocations will be central to the delivery of the Local Plan Strategy, that Masterplans should address the site specific requirements in Appendix 6, and that the Council will seek to enter into Planning Performance Agreements, setting out a programmed approach for delivery. The Development Partners support this approach.

1.9 These representations focus in detail on the draft site specific policy (SA02), but have also considered other plan-wide policies where relevant, given that the Site Allocation policy states that where a policy is silent, relevant plan-wide policies will apply.

1.10 Representations have been prepared on the following policies:

- Policy SA02: Land South of Gartree Road Strategic Development Area
- Policy DS02 Development Strategy: Creating Jobs and Diversifying the Economy
- Policy DS05 Development Strategy: Supporting Strategic Infrastructure
- Policy HN01 Housing Need: Affordable Homes
- Policy HN04 Housing Need: Supported and Specialist Housing
- Policy HN05 Housing Need: Self and Custom Build Housing
- Policy HN06 Housing Need: Gypsy and Traveller and Travelling Showpeople Accommodation
- Policy DM04: Landscape Character and Sensitivity
- Policy DM06: Transport and Accessibility
- Policy DM09: Sustainable Construction and Climate Resilience

1.11 For each policy, we will where appropriate consider the following, in line with HDC's online consultation form:

- Legal Compliance
- Soundness
- Compliance with Duty to Cooperate
- Evidence
- Proposed Modifications to Policy and Supporting Text

1.12 This document includes the following Appendices:

- Appendix 1: Marked up version of Policy SA02
- Appendix 2: Vision and Masterplan Principles (2024)
- Appendix 3: Illustrative Masterplan Update (2025), incorporating uses identified in draft Allocation SA02;
- Appendix 4: Education Requirements Technical Note
- Appendix 5: Review of Viability Evidence (CBRE) (2025)
- Appendix 6: Updated Transport Assessment (2025)

1.13 These representations have also been disaggregated into separate forms, and submitted via HDC's online consultation portal.

2 Response to Policies

2.1 The Development Partners support the principles and broad direction of Site Allocation Policy 5 (SA02). The joint policy between OWBC and HDC, represents an exemplary approach to positive plan preparation. The two Authorities, along with the other Leicestershire districts, the City Council and the County Council have worked together in producing the Leicestershire Growth Strategy and the subsequent Statement of Common Ground allocating Objectively Assessed Need ('OAN') between the Authorities in accordance with the Duty to Cooperate.

2.2 Although this allocation for 4,000 homes was based on the total 'OAN' using the Standard Method ('SM') that was in place at that time of preparing the evidence base, the total across the authorities in the Statement of Common Ground remains within 75 homes of the total 5,789 homes per year across the Leicester and Leicestershire Authorities in the new 'SM' from the December 2024 version of the NPPF[1].

2.3 In this Reg 19 Draft Local Plan, HDC meet the agreed OAN (including unmet need in Leicester) set out in that Statement of Common Ground. This is a sustainable and appropriate location for such development, being on the edge of the 'Leicester Urban Area'.

2.4 U&C is one of the UK's leading 'Master Developers' of large scale mixed use housing led development and has extensive experience of planning for and delivering such sites. HE is the Government's housing and regeneration agency and works with public and private sectors to bring forward large strategic sites. This site has been named by the Government as a New Homes Accelerator, which is a cross-government effort to accelerate large-scale housing projects across the country, bringing together experts from Homes England and central Government to support faster delivery.

2.5 The partners' collective knowledge and experience is invaluable in ensuring that the allocation can be delivered within the plan period, which has been a problem with other large sites in Leicestershire. Our detailed comments below therefore relate to ensuring in particular that the site is 'deliverable' ('Effective') based on practical experience and the evidence provided by the Authorities and other stakeholders ('Justified').

2.6 The table below includes the specific proposed changes to the Policy and Supporting Text to make the policy sound, we append a marked up version of the full policy at Appendix 1.

[1] MHCLG, 2024, Indicative local housing need (December 2024 – new standard method)

Policy SA02: Land South of Gartree Road Strategic Development Area

Legal compliance	Planning Obligations placed on development proposals for Site SA02 will need to be compliant with the tests set out in Regulation 122 of the CIL Regulations (2010 as amended). At present the 'fixed' and 'inflexible' wording around infrastructure requirements, in association with other Plan policies (DS05 and HN01) mean that there are foreseeable circumstances where it would not be possible to be in accordance with the Local Plan policy (which requires all infrastructure listed in the policy to be delivered) and Regulation 122 (being necessary to grant planning permission and fairly and reasonably related in scale and kind). We suggest amendments to rectify this.
Soundness	The Development Partners welcome the draft policy and agree with much of its content. Our comments below are aimed at securing soundness and can be dealt with through specific Minor Modifications which we propose in a following section. **Not Justified:** The policy is broadly 'justified' but parts of the policy, including the level of detailed requirements for uses (Education, Employment Land, Travelling Show People, Affordable Housing) are not justified based on the previous and new evidence brought forward in the Plan. In light of the new evidence provided, on which OWBC's Local Plan also relies, we have removed previous suggestions in response to the OWBC draft to delete those parts of policy relating to employment land and travelling show people. Instead we have suggested amendments to the policy wording to reflect the evidence. In the following section on the evidence base we review and highlight relevant parts of the Local Plan evidence base which are not consistent with proposed policy, and also detailed work undertaken by the Development Partners. In the main these can be resolved by revisions to the draft policy although on Transport issues further evidence will be required and the Development Partners are seeking to work with the Authorities to commission this work. **Not effective:** The cumulative impact of meeting the requirements of Policy SA02, including the additional requirements for Travelling Show People, Employment Land and providing for strategic as well as scheme education needs, on the site, challenges the site capacity to meet the identified housing need and the costs (including opportunity cost of land for uses other than housing) risk making the site not 'deliverable'.

In comparison an immediately neighbouring site, allocated for 600 homes in the Regulation 19 draft OWBC Local Plan, has limited on site infrastructure requirements but is expected to only provide 20% affordable housing, compared to 40% across this site. The Viability Study for the HDC Local Plan does not demonstrate that the 40% affordable housing requirement is deliverable, and the approach taken is inconsistent with the NPPF paragraphs 56 to 59.

As a general principle the site will see delivery beyond the period of both Local Plans and is therefore going to be subject to changing demographic and technical requirements and new and different models of public service provision. Policy should be flexible enough for development to respond to these changing circumstances whilst ensuring that the infrastructure and quality are secured.

Our proposed changes, based on the Development Partners' experience elsewhere, strike an appropriate balance. General Plan policies do allow for site specific viability assessment (DS05 and HN01) but only in exceptional circumstances and expect fixed on site requirements to be a starting point. For a site like this, which is critical to Plan delivery, it would be more appropriate, based on the Councils' own viability evidence and recent experience on strategic sites here and elsewhere, to have a flexible policy which allows for a phased approach to viability and for infrastructure and housing priorities to be planned for, monitored and managed in a transparent way.

The Development Partners produced a broad Vision for the site submitted in July 2024 (Appendix 2). This document pre-date the draft policy and was undertaken to help identify the land budget and capacity of the site. The emerging policies from both Councils (HDC and OWBC) introduced additional requirements for the Site. In producing this response, the technical team have reviewed the illustrative masterplan to test the site capacity to meet these additional requirements. The Illustrative Masterplan as shown in Appendix 3 This confirms that the policy requirements can be met on site, subject to the suggested modifications on specific uses and flexibility requested. A more detailed updated land budget will be produced in advance of the examination.

The Development Partners has engaged with the authorities on the technical issues arising from the vision document (Appendix 2). This document should be regarded as indicative and will be updated once revised transport modelling is available.

The site continues to have capacity for c. 4,000 homes which would be roughly split between 1,000 in OWBC and 3,000 in HDC depending on the locations of infrastructure and open space. The policy should allow the flexibility for 850 to 1,000 homes in OWBC, and the balance in HDC. The split will be confirmed through the masterplan and planning application process with placemaking in mind.

	Parts of the policy are not consistent with National Policy as set out in the recently published NPPF (2024). Specifically, Part b of Policy 9, and supporting text paragraph 12.10.5, does not reflect the NPPF paragraph 109, which states that a vision-led approach should be used to identify transport solutions that deliver well-designed, sustainable and popular places. We suggest the amendments that follow.
Compliance with Duty to Cooperate	The policy is a good example of strategic co-operation that the Government is seeking to encourage, being a joint policy between Authorities to meet agreed strategic need.
Evidence	U&C and HE have previously submitted a vision for the site (Appendix 2) and associated summary of evidence from their professional team across the full range of specialist areas. This confirms the broad site capacity, indicative layout, and that the site is deliverable. In relation to the evidence that is currently published we make the following points: ***Infrastructure Delivery Plan, Stage 2 Infrastructure Schedule, February 2025*** The Development Partners agree with the Council that well planned and delivered infrastructure is critical for the success of the development of site SA02. The Stage 2 Infrastructure Delivery Plan provides a reasonable assessment of demand for infrastructure, confirming the detailed assessments that the Development Partners have undertaken for the site which were appended to our July 2024 submission. The Development Partners have been keeping these reports updated, but the broad conclusions remain the same. They are happy to provide more detail in any area should the Inspectors wish to be informed. The Development Partners have also been engaging with HDC, OWBC and LCC on specific issues that have been raised by LCC in relation to infrastructure for which they have responsibility: principally education and transport. In relation to education the OWBC and HDC Regulation 19 Draft Plans have slightly different requirements and it is important that these are made consistent. Appendix 4 sets out what the Development Partners believe is the current factual position and should be reflected in policy. This has been discussed with the Authorities and the Development Partners will be seeking to agree a Statement of Common Ground with the Councils following the Regulation 19 submissions.

In summary the requirements (across Oadby and Wigston and Harborough) are:

- Early Years provision on site
- Up to 6FE primary school provision generated by the site, and to be provided on site
- Up to 8FE of secondary provision, with land to be provided and capital contributions to meet the needs of children living on the site, of which up to 4.5 FE may be generated by the site.

In order for any planning obligations to be lawful they will need to meet the requirements of Regulation 122 of the CIL regulations. This will need to include equalisation mechanisms in relation to both land and capital costs to ensure that developers of other sites that benefit from this strategic provision to meet their need contribute towards this. In addition the phasing of secondary school delivery is likely to require a school of a size larger than the needs of on site residents, in part in advance of need. It will be essential that there is a mechanism supported by public sector partners to ensure that this can be funded with appropriate external contributions to avoid delay to development.

Given the long duration of the project and uncertainties about wider demographic and policy changes the policy sensibly proposes that an Education Delivery Strategy be produced with a planning application to deal with the detail that cannot be dealt with at Local Plan stage. Subject to the proposed changes we believe this part of the policy is sound.

The proposed Local Centre in the indicative Masterplan has capacity to meet the NHS requirements set out in Table 12, again subject to an appropriate delivery model. The IDP also identifies the potential need for sewerage and surface water infrastructure investments, the need for a masterplanned approach to transport and highway integration (4.1.1) and car parking provision (4.1.5). These have been assessed in detail by the Development Partners and their technical team and can be practically addressed at feasible cost. The site has capacity for water attenuation that can also contribute to reducing flood risk in the surrounding area.

Any other planning obligations will need to meet the tests of Regulation 122 of the CIL regulations

Harborough District Council Local Plan Viability, Main Viability Report, January 2025

Both HDC and OWBC have commissioned viability assessments of their Local Plans. The Development Partners have submitted information on development content, costs and phasing and engaged with the consultants on those studies.

For avoidance of doubt this is not a number that HE or U&C recognise and may have arisen from an error in transcription from a meeting.
We have responded in separate representations to OWBC (on their study undertaken by HDH), noting that the Councils agreed that the HDC study (undertaken by Aspinall Verdi) would contain the site specific viability assessment for Land South of Gartree Road. In summary our conclusion on that report was that

"We would… note that Table 10.9a (of the Whole Plan Viability Assessment 2024) showing maximum developer contributions for sites in Oadby indicates that site AP5 has lower maximum developer contributions than the neighbouring site AP6. AP6 is also proposed as a draft allocation but with lower infrastructure requirements, including no on-site schools, and with 20% affordable housing."

On the basis of this evidence the 40% affordable housing (in addition to the full range of other requirements) is not justified. We therefore propose flexibility in the policy to have the 40% as an 'up to' target and subject to viability considerations." (Development Partners' Response to OWBC Regulation 19 Draft Plan)

We have attached at Appendix 5 an assessment of the HDC Viability Study and site specific appraisal, produced by CBRE. In summary it concludes that while the viability study is correct to find the site broadly viable, it does not justify a fixed 40% requirement for affordable housing (the sample appraisal shows a deficit at this level) in Policy SA02 and the approach taken to the policy is therefore not consistent with national policy and nor is it justified.

The report repeats the advice that the Development Partners have previously provided: that the model it uses is not reflective of the 'Master Developer' model for a large strategic site such as this, which probably overstates the immediate viability. Similarly several of the inputs lack evidence or are not appropriate or up to date.

Therefore, for the policy to be '**Effective'** (Deliverable), it needs to allow for the uncertainty in the precise levels of affordable housing and infrastructure requirements for each phase.

We note that Policy DS05(5) allows for viability assessment, it also sets an expectation that the policies have been viability tested and that 'policy compliant contributions will be made'. Similarly Policy HN01d, allows, in Exceptional Circumstances, a lower level of affordable housing to be provided based on viability evidence, and part (e) for schemes of over 500 homes it allows for re-assessment over the lifetime of the development.
In our view, for Policy SA02 to be justified it needs to reflect the fact that the Viability Study does not demonstrate viability at 40% affordable housing and detailed infrastructure requirements (see above) will need to be defined and will vary through the lifetime of the development.

Rather than rely on policies DS05 and HN01 to operate as a 'reactive' safety valve it would be both **justified** and **effective** to acknowledge these uncertainties up front and allow for flexibility to deliver for a range of outcomes on a phase by phase basis, agreed at the time of any Planning Permission and based on a transparent and co-operative approach of prioritisation, rather than a confrontational approach driven solely by viability assessment.

Employment Land

Harborough Local Housing and Employment Land Evidence Report and Appendices (2025) & Strategic B8 Needs Sensitivity Report (2025)

These two reports set the Evidence Base for the requirement to provide 5 hectares (ha) of employment land in the draft plan policy.

These reports identify an 'objectively assessed need' of 61 hectares of employment land with a further 16.4 hectares allocated to strategic sites, including SA02 (see Policy DS02). The detailed justification for and proposed uses to be incorporated into this land are not set out.

The NPPF (paragraphs 77 and 111) suggests that large sites should consider realistic options for employment uses on site. In the case of site SA02 this will also need to consider placemaking and the role of the site in the wider South East Leicester context. This makes it unlikely to be an appropriate location for B8 uses. This would therefore suggest the potential for smaller scale E class uses linked with the settlement and a proportionately sized local centre. In addition the development will provide hundreds of jobs in public and other local services.

In this context, where the specific uses/need has not been justified it is unsound to use a simple 'hectare' measure in the policy and would be more appropriate to list the types of uses (Town Centre E Class and possible B2) which does not compromise residential amenity. This should have an 'up to' 5ha' figure given the non-town centre location. This would make this part of the policy effective (deliverable).

For avoidance of doubt the site does have the physical capacity to meet this requirement, but the final amount and format should be left flexible.

Gypsy, Travellers and Travelling Showpeople

The Draft Policy (Part 4D) requires the provision of a site or sites for 5ha of land for travelling show people ('TSP').

Two evidence base reports support this approach, the ***Harborough District Council Gypsy and Traveller Accommodation Assessment (2024)*** which identifies broad need and the ***Gypsy & Traveller and Travelling***

Showpeople Site Assessment (Final Report November 2024) which considers individual sites.

The latter, in assessing the role of sites in delivering need for TSP suggests the following draft policy at Paragraph 6.11:

- *"Part 1: provision of land for 'up to 5 hectares'*
- *Part 3: Offsite yards in lieu of the plots required on the strategic allocations will only be acceptable where all of the following criteria are met (as well as the criteria set out in Policy xxx 5. below):*

  a) the alternative site provides for at least the same quantity of provision as required by the relevant allocation policy;
  b) the alternative site is considered as sustainable with regards to access to services when compared with the site allocation for which it is a substitute.
  c) the site can be developed within the same timeframe (or faster) as the strategic allocation site being replaced; and
  d) the site would meet the needs of the Showmen it is intended to accommodate."

This has not been carried through into either Policy HN06 (Housing Need: Gypsy and Traveller and Travelling Showpeople Accommodation) or site specific policy SA02.

As the report notes sites for TSP have significant site specific issues, in particular the need for access to the main highway network and for commercial, and sometime noisy operations to take place on them. In addition occupiers seek security to prevent access to their equipment. This would provide part of the justification for allowing the potential for provision on land nearby, but not necessarily part of, a mixed use allocation.

Urban&Civic, through the Farmcare Estate has major landholdings in the area to both the north and south of the site. One or more of these sites might provide a better option for provision of this land than within the SA02 allocation. If the Council was to include the policy proposed by its advisors in its evidence base, this would make the policy '**effective'** (deliverable) in allowing alternatives to be brought forward provided that they met specified criteria.

This could be included only in Policy SA02 if the Council does not wish to apply it more generally and would combine the certainty of a site specific allocation with the flexibility, and the possibility to accelerate provision.

Transport Evidence

The Development Partners have been engaging with HDC, OWBC and LCC in relation to transport evidence. The evidence base, across the two plans has been commissioned by various parties (HDC & OWBC and LCC), and

the Development Partners have commissioned their own site specific study, (a summary of which is included as part of the technical summaries at Appendix 6).

The South Leicestershire Joint Transport Evidence, Stage 1, prepared by AECOM, dated January 2025 takes a high level view of strategic sites, including Land South of Gartree Road, and confirms the Development Partners' view that:

"Our initial view from a high-level assessment of forecast modelling suggests that the issues created by the following sites are of a scale that could be mitigated"

The Development Partners commissioned their advisers (SLR and i-Transport) to review the approach and evidence documents. A summary of their conclusions is attached as Appendix 6. This finds that the recent adoption of the 'Vision and Validate' approach in the December 2024 NPPF update confirms the broad approach taken in their proposed strategy for site SA02. It notes that there are differences in the various modelling assumptions and the need for an agreed approach to updated modelling, which can then inform the final strategy and mitigation measures.

The Development Partners are aware that LCC took a draft response of the Regulation 19 Draft Plan to its Cabinet on 18 March 2025 which raised concerns about the approach currently being taken to transport planning. In this context The Development Partners and their technical consultants have engaged with LCC, HDC and OWBC and have attended two meetings to agree a way forward. It has been agreed in principle that the Development Partners will commission LCC to undertake two items of work:

- LCC to provide the 2023 PRTM traffic data to allow SLR to run a comparison with the 2019 PRTM traffic data which has been used to date;

- LCC to run the PRTM model for two strategic scenarios, with high-level parameters, proportional for testing a Local Plan stage (such as access locations) agreed in advance. This will also include the testing of a 'through route' through the site between the A6 and Gartree Road.

This should enable the Development Partners and Authorities to reach an agreed position on modelling and programme to then address strategic issues, including design and mitigation measures and the scope and costs of any off-site works. The Development Partners are aiming to agree a Statement of Common Ground with the Authorities on these matters in advance of the examination.

In the meantime they and their advisers remain confident that the site is deliverable, supported by practical and proportional mitigation measures. We

	propose minor changes to policy to make it justified and effective (deliverable).
Proposed specific track changes to policy	1. Land South of Gartree Road, as identified on the Policies Map, is allocated for a new sustainable, residential-led mixed-use development. The site adjoins land within the administrative boundary of Oadby and Wigston Borough Council and will form a cross-boundary site allocation within respective Local Plans. The Councils will work together with partners to deliver a comprehensively planned cross boundary development in accordance with an approved heritage **informed** ~~led~~ masterplan. 2. Mechanisms for effective delivery of infrastructure will be required to support the development. Infrastructure, as set out in the Infrastructure Delivery Plan, must be implemented alongside development in accordance with ***triggers and obligations*** ~~a Phasing Strategy~~ approved by the Councils, ***subject to flexibility to ensure that it continues to meet the changing needs of the development and wider area***. 4. The masterplan for the site must meet the masterplan requirements set out in Appendix 6 and include: a) Phased delivery of approximately 4,000 new homes, of which ***at least*** ~~3,150~~ **3,000** are to be in Harborough District. b) Provision of **appropriate employment uses, services and a local centre providing jobs broadly equivalent to up to** 5 hectares of new general employment land within Harborough District. c) ***Capacity for*** ~~Provision of~~ all required community infrastructure as set out below. 4a. Provision of a site or sites of **up to** 5 hectares of land **on the site or in the broad area** to meet the needs of travelling show people within Harborough District. **Off site provision will only be accepted where:** **a) the alternative site provides for at least the same quantity of provision as required by the relevant allocation policy;** **b) the alternative site is considered as sustainable with regards to access to the road network and services when compared with the site allocation for which it is a substitute;** **c) the site can be developed within the same timeframe (or faster);** **d) the site would meet the needs of the Showpeople it is intended to accommodate; and,** **e) the site will not have an unacceptable adverse impact on existing neighbouring residential amenity, including noise from any commercial activities.**

5. Delivery of new homes must include:

b) ***A proportion of new homes delivered as affordable homes compliant with the Policy HN01 up to a target of 40 per cent, subject to viability.*** ~~40 per cent of the new homes across the entire site delivered as new affordable homes in accordance with Policy HN01.~~

6. Delivery of the following community infrastructure is required to serve the new development***, in doing so applicants should consider the potential for multi-use facilities, co-location of provision and community access to services:***

b) ~~Provision of~~ ***Capacity for*** a new Primary Health Centre and wider NHS healthcare services, to be located within or adjacent to the new Local District Centre.

c) Provision of a new community hall and leisure facilities, to be located within or adjacent to the new Local District Centre ***or as part of co-located provision***

d) Provision of sports pitches, children's equipped play areas and other outdoor recreational facilities, serving identified needs, along with new open spaces ~~in accordance with~~ ***informed by*** the relevant standards set out in the supporting text to this policy.

e) ***Provision of capacity to meet the educational needs of the site, with pre-school, primary school and secondary school demand met on site in full with capacity to meet wider strategic growth needs for secondary school provision if required. The Applicant should produce an Education Delivery Strategy to be approved by the County Council which considers options for meeting these requirements which will include the provision of new schools meeting DFE standards and may include the expansion of existing schools. This will include mechanisms for equalisation of contributions from other sites which rely on the capacity of the site, or from other public bodies where it is to meet basic need, which will cover land and capital costs. This will also include mechanisms for securing forward funding where a school is expected to provide wider capacity in advance of other developer contributions being secured.***

Site specific requirements will be based on relevant County Council yields, at a minimum the Masterplan should demonstrate capacity for:

• Up to 6 forms of primary school entry including early years provision, with locations based on ensuring walkable access from all parts of the site;

• Up to 8 forms of Secondary School Entry, noting that demand for up to 4.5 forms of entry is likely to be generated by the site.

The delivery of school provision will be phased with the development and monitored to ensure that it continues to meet requirements.
~~Provision of education facilities to meet the primary and secondary needs arising from the site. Provision of sufficient land for an 8-form entry secondary school, including post 16 provision to accommodate wider strategic growth needs and 5 forms of entry primary school provision, including early years provision. Other developments or public funding will be required to contribute to the costs of any provision that is not required to meet the needs of the site. The Applicant should produce an Education Delivery Strategy in conjunction with the County Council to be approved by the Councils which considers options for meeting these requirements which will include the provision of new schools meeting DFE standards and may include the expansion of existing schools.~~

Environment and Design

7. The following environment and design aspects must be adhered to.

a) The development must illustrate the highest standards of design through submission of ~~a Design Code(s)~~ ***Design Principles*** as part of the masterplan ***and a Design and Access Statement with Design Codes for each part of the development as it is brought forward.***
d) Development must retain and enhance the comprehensive Green and Blue Infrastructure Networks ***where possible***, including existing woodland, spinneys, and hedgerows throughout the site to create an immediate mature setting for new development and to integrate the development with the surrounding landscape.
e) Landscaping should be designed to, ***where possible,*** screen potential views ~~to the development, particularly in~~ ***from*** visually sensitive areas which include Wash Brook Valley footpaths, the eastern slopes ***of*** ~~near~~ the River Sence corridor, and the ~~southern~~ fields ~~adjacent~~ ***to the immediate south of the Listed Building at Stretton Hall.***

Transport

9. The following transport aspects must be adhered to.

a) The strategy for the site must be underpinned by a vision-led approach promoting sustainable transport modes to, from and within the site, and demonstrate how the components of the strategy can build up over time to support the development;
~~b)~~ **c)** Impacts on the wider strategic and local highway must be mitigated. The impacts will be informed by a ***sustainable*** Transport Assessment that sets out off site and on-site transport measures to mitigate impacts from the development.

	~~e)~~ **f)** There must be provision for a frequent (minimum 15-minute) ~~zero~~ ***low*** carbon bus service connecting the site with the wider service network, as well as other sustainable public transport solutions. ~~f)~~ **g)** There must be provision of an appropriate number of bus stops and associated infrastructure, including bus shelters and information display boards on-site. Travel Plans incorporating measures to encourage more sustainable travel behaviours will be required. ***These could include Mobility Hubs to incorporate cycle parking, car clubs, and other low carbon transport modes.*** **Utilities** 11. The necessary utilities, including wastewater, water supply, electricity, and ~~gas~~ ***fibre*** network must be provided. The phasing and occupation of development should align with the delivery of ~~sewerage~~ ***utilities*** infrastructure, in liaison with service providers. **Delivery and Phasing** 12. The site will be brought forward supported by ***an illustrative*** masterplan which addresses the policy requirements set out above and ***provides the framework, alongside the broad triggers for the provision of infrastructure, for key phases to be identified and delivered throughout the development which specify the location of that*** ~~clearly identifies the phases of development, and the location and timing of the provision of all~~ key infrastructure in accordance with the Infrastructure Delivery Plan within and beyond the plan period. ***12a. Viability may be reviewed on a phase by phase basis using an agreed method to determine the infrastructure and affordable housing content of each phase.*** 13. For the avoidance of doubt, if this policy is silent on an aspect or issue, the relevant policy within this Local Plan must be used. ***This policy requires submission of a Design Code(s) as part of the masterplan therefore Policy 2.1 of the Oadby and Wigston Local Plan does not apply to this allocation***.
Proposed specific track changes to supporting text	5.10 The defined site boundary will be identified on each Council's Adopted Policies Map as SA02 in the District of Harborough and as AP5 in the Borough of Oadby and Wigston. The site is located within close proximity to Leicester City and is well placed to contribute towards provision of sustainable development and the site will provide for approximately 4,000 dwellings across the site, with ***at least*** ~~3,150~~ ***3,000*** new homes ~~and 5 hectares of employment land~~ within Harborough District, and at least 850 homes in the Borough of Oadby and Wigston. 5.13 The new development will create a high-quality and sustainable extension to the existing urban area and Stretton Hall, but also, will maintain a visual and physical separation between the settlement ~~of~~ ***and*** Oadby. Separation will also be afforded to the existing village of Great Glen through the creation of a new Area of Separation in Harbough District, which will

prevent coalescence and will protect individual character and identity of the settlement.

5.17 Addressing transport impacts is necessary to ~~manage increased traffic, ensure road safety, and~~ promote sustainable travel, ***ensure road safety and manage cumulative residual impacts on the road network***. Safe vehicular access, regular bus services, and high-quality cycle and pedestrian routes are vital to reducing car dependency and encouraging healthier, more sustainable modes of transport ***through a vision-led approach***.

5.19 Phased infrastructure provision is essential to avoid straining existing services. By delivering schools, healthcare, and a local centre in tandem with housing, the development can meet community needs from the outset. Sports pitches and recreational facilities promote physical activity and community cohesion, fostering a healthy living environment for future residents. This would offer a high-quality recreational area for both existing and new residents, while improving biodiversity and habitat value. All open space provision and open space standards for the site, regardless of location, must ***be broadly consistent with*** ~~conform to~~ Harborough District open space standards ***although the Councils may agree bespoke approaches within the overall requirement where that results in a better outcome***. This is to ensure that the entire site, even areas ~~of~~ within the Borough of Oadby and Wigston, has a consistent approach to open space provision.

5.23 This Policy and the Infrastructure Delivery Plan for this Site will ensure that phased essential infrastructure provision will avoid straining existing services in the locale as the new community grows to its full and complete maturity. By delivering necessary education, highways and transport, healthcare, open spaces, sports and leisure facilities, biodiversity and habitat creation, and, other much needed community infrastructure in tandem with housing and employment growth, means the development can meet the new demands from the outset and for generations to come. ***Given the length of the development the plan will need to be applied flexibly to ensure that the needs of communities and changes of approach by public authorities to provision are appropriately met. Where the site is meeting wider strategic needs contributions from other developments will be sought to contribute to the costs of that provision in line with Regulation 122 of the CIL Regulations (2010, as amended).***

Policy DS02 Development Strategy: Creating Jobs and Diversifying the Economy

Legal compliance	Not applicable
Soundness	Not justified: The Council's evidence base identifies an 'objectively assessed need' of 61 hectares of employment land with a further 16.4 hectares allocated to the three strategic sites, including SA02 (see Policy DS02). The detailed justification for and proposed uses to be incorporated into this land are not set out. Whilst it is appropriate, consistent with National Policy to include employment uses as part of a large mixed use site, the use of a metric of hectares of 'employment' land is inappropriate. We have suggested in relation to the site allocation policy alternative wording. This should also be incorporated into this policy.
Compliance with Duty to Cooperate	Not applicable
Evidence	Harborough Local Housing and Employment Land Evidence Report and Appendices (2025) & Strategic B8 Needs Sensitivity Report (2025)
Proposed specific track changes to policy	Change 2 a) to read: Provision of ***appropriate employment uses, services and a local centre providing jobs broadly equivalent to up to*** 5 hectares of new general employment land within Harborough District on Site SA02.
Proposed specific track changes to supporting text	n/a

Policy DS05 Development Strategy: Supporting Strategic Infrastructure

Legal compliance	Parts 2 and 5 are not consistent with Regulation 122 of the CIL Regulations (as amended) as it cannot be determined in advance whether the relevant tests are met. Policy needs to be amended to reflect the need for assessment at the time of application and for phased developments during implementation.
Soundness	Not justified, not effective: Part 2 of the Policy requires the detailed site-specific mitigation schemes included within the site allocation Policies SA01, SA02, SA03 and SA04 are required and expected to be included within development proposals. As we note above in relation to site specific policy SA02, and acknowledged in Part 3 of this policy for large sites, infrastructure will be delivered over an extended period and will be subject to changes in demographics, technology and policy. For SA02 there will therefore need to be an Infrastructure Delivery Plan which is flexible enough to accommodate this. This should be reflected in the policy. Part 5 of the Policy relates to Viability Review. It assumes that all infrastructure required in the policy will be required, in line with Part 2, and that variation will only b required in exceptional circumstances and then only on the basis of a viability assessment. In practice infrastructure requirements will inevitably vary for many reasons other than viability. The policy therefore needs to include a review process which is not viability dependent. Policy SA02 requires an Infrastructure Delivery Plan for the site, and in our representations on that policy we are suggesting that this is aligned with a phased review and viability process to determine the content of each phase. We therefore suggest this policy is amended to reflect that.
Compliance with Duty to Cooperate	Not applicable
Evidence	Infrastructure delivery Plan (2025) Viability Study (2025)
Proposed specific track changes to policy	2. The detailed site-specific mitigation schemes included within the site allocation Policies SA01, SA02, SA03 and SA04 are required and expected to be included within development proposals and site development costs. Development proposals should make provision for all the land required to accommodate any additional infrastructure arising from the development on site. Requirements will be reviewed on a Phased basis. 5. The policies within this Local Plan have been viability tested, and it is the expectation that policy compliant contributions will be made. A variation to the requirements set out in Policy within the Plan ***may be***

	triggered by changes in development phasing and need**. **For strategic sites this will be subject to agreed plans and review processes**. **Changes to provision based on viability will only be accepted by the Council in exceptional circumstances. In such cases, a site-specific viability assessment may be accepted where viability is identified as a barrier to delivery. Where it is identified that the Policy requirements set out within this Local Plan cannot be met, this must be supported by evidence to be independently verified as part of an open book viability appraisal. The costs of this work will be borne by the applicant. The weight placed on this assessment will be determined on a case-by-case basis.
Proposed specific track changes to supporting text	n/a

Policy HN01 Housing Need: Affordable Homes

Legal compliance	n/a
Soundness	Not justified, not effective The Development Partners are strongly committed to delivering mixed and balanced communities and will be seeking to maximise affordable housing in any development proposals, whilst meeting the Councils' aspirations for Infrastructure Led development and placemaking. This will require a partnership approach with the Authorities. Part 1 of the Policy requires 40% of homes in any development over 10 dwellings to be affordable. As we have noted above the Viability Assessment does not justify that level for site SA02. We have proposed a modification of that policy to set that target as 'up to' for that site. There should be a consequential amendment to part 1 of this policy to confirm it doesn't apply to site SA02. On part D we are proposing a bespoke Infrastructure and Housing Delivery phased review mechanism. For a site of the scale of SA02 a variation in the policy target cannot be considered in isolation from infrastructure delivery and phasing. Part E refers to a phased approach for sites over 500 homes, but again this is triggered solely by viability. We again would suggest that these parts should not apply to site SA02.
Compliance with Duty to Cooperate	Not applicable
Evidence	Local Plan Viability Study
Proposed specific track changes to policy	1. To meet the need for affordable housing 40% of the total number of homes in residential developments of 10 or more homes (or capable of delivering 10 or more homes), ***unless otherwise specified in a site specific policy***, must be affordable. d) Where it is robustly demonstrated that the required provision of affordable housing would make a scheme unviable, the requirement for a lower level of provision of affordable housing will be considered. In these exceptional circumstances, a clear justification supported by an independent viability assessment will be required. The costs of subsequently reviewing this work on behalf of the Council will be borne by the applicant. ***Bespoke mechanisms for strategic allocations, linked to site specific policies and DS05 (Infrastructure) may be agreed.*** e) For schemes of 500 or more houses, where a non policy compliant scale of affordable housing is accepted as a result of viability issues,

	or as part of a wider bespoke mechanism for an allocated site, in accordance with ***d)*** above, viability will be reassessed at agreed times over the lifetime of a development based on actual costs and values generated by the development. The cost of the Council reviewing this will be borne by the applicant.
Proposed specific track changes to supporting text	n/a

Policy HN04 Housing Need: Supported and Specialist Housing

Legal compliance	
Soundness	Not justified: Requirement for 10% specialist housing for all residential development of over 100 dwellings is not justified or effective for strategic sites
Compliance with Duty to Cooperate	Not applicable
Evidence	
Proposed specific track changes to policy	Specialist housing for older people will be required as an integral part of all residential development of 100 dwellings ***to 500 dwellings*** at a rate of at least 10% of all dwellings proposed, providing the site offers a suitable location for the provision of this type of accommodation. ***Strategic site allocations should define the proportion within their housing strategy, which will be subject to ongoing monitoring and review.***
Proposed specific track changes to supporting text	n/a

Policy HN05 Housing Need: Self and Custom Build Housing

Legal compliance	
Soundness	Not justified, not effective Requirement for 10% self or custom build homes on a site of the scale of SA02 is not evidenced and may not be deliverable.
Compliance with Duty to Cooperate	Not applicable
Evidence	
Proposed specific track changes to policy	1. To contribute to meeting demand for self and custom build plots, all nonspecialist development of 40 dwellings (gross) or more must provide at least 10% of the total number of dwellings as self or custom build plots. **Strategic site allocations should define the proportion within their housing strategy, which will be subject to ongoing monitoring and review.**

Proposed specific track changes to supporting text	n/a

Policy HN06 Housing Need: Gypsy and Traveller and Travelling Showpeople Accommodation

Legal compliance	
Soundness	Not justified. See our response to policy SA02. The Gypsy & Traveller and Travelling Showpeople site assessment (Final Report November 2024) recommends a policy approach which suggests requirements of 'up to' 5 hectares on strategic sites, with an option for off site provision in defined circumstances. The policy should reflect the advice of the consultants, either as part of the site specific policy or Policy HN06.
Compliance with Duty to Cooperate	Not applicable
Evidence	The Gypsy & Traveller and Travelling Showpeople site assessment (Final Report November 2024)
Proposed specific track changes to policy	***For strategic allocations provision of a site or sites of up to 5 hectares of land on the site or in the broad area to meet the needs of travelling show people within Harborough District. Off site provision will only be accepted where:*** ***a) the alternative site provides for at least the same quantity of provision as required by the relevant allocation policy;*** ***b) the alternative site is considered as sustainable with regards to access to the road network and services when compared with the site allocation for which it is a substitute;*** ***c) the site can be developed within the same timeframe (or faster);*** ***d) the site would meet the needs of the Showpeople it is intended to accommodate; and,*** ***e) the site will not have an unacceptable adverse impact on existing neighbouring residential amenity, including noise from any commercial activities.***
Proposed specific track changes to supporting text	n/a

Policy DM04: Landscape Character and Sensitivity

Legal compliance	n/a
Soundness	Not effective. Part (d) includes reference to restoring or 'equivalent mitigation' for damaged features. The policy and supporting text do not set out how ‘equivalence’ should be assessed, and this would make the policy subjective and difficult to implement.
Compliance with Duty to Cooperate	n/a
Evidence	n/a
Proposed specific track changes to policy	d) restores or provides ~~equivalent~~ mitigation ***or landscape improvements*** for ~~damaged~~ features and/or landscapes that would be damaged or degraded as a result of the development.
Proposed specific track changes to supporting text	n/a

Policy DM06: Transport and Accessibility

Legal compliance	n/a
Soundness	Priority should follow the travel hierarchy, as set out in wider transport and planning policy, where pedestrians and cyclists are prioritised. Therefore, active travel should be mentioned first before public transport. The priority is written correctly in the supporting text but this is not reflected in the policy text.
Compliance with Duty to Cooperate	n/a
Evidence	n/a

Proposed specific track changes to policy	1. Development will be permitted, subject to: a) ensuring the safe, connected and convenient movement across the transport network, including pedestrians, cyclists, public transport passengers and horse riders. ***(note re-ordering)***
Proposed specific track changes to supporting text	n/a

Policy DM09: Sustainable Construction and Climate Resilience

Legal compliance	n/a
Soundness	Effective A 3 star rating under BRE Home Quality Mark scheme is one of several sustainable constriction standards. We therefore suggest an adjustment in wording to be inclusive of alternative sustainability accreditations/routes to provide a more flexible approach as HQM is not widely adopted and may not be preferred for all development. In addition, HQM is transitioning into BREEAM UK New Construction: Residential (from April 2025).
Compliance with Duty to Cooperate	n/a
Evidence	n/a
Proposed specific track changes to policy	2. All new-build residential developments must achieve ***appropriate accreditation, for example*** a three star rating under the BRE Home Quality Mark scheme ***or equivalent***. A whole life-cycle assessment should be undertaken as part of this assessment for major development.
Proposed specific track changes to supporting text	n/a

Appendix 1:

Marked Up Full Version of Policy SA02

Policy Text

Policy SA02: Land South of Gartree Road Strategic Development Area

1. Land South of Gartree Road, as identified on each Council's Policies Map, is allocated for a new sustainable, residential-led mixed-use development. The land sits within the administrative boundaries of Harborough District Council and Oadby and Wigston Borough Council and forms a cross boundary site allocation within respective Local Plans. The councils will work together with partners to deliver a comprehensively planned cross boundary development in accordance with an approved heritage ***informed*** ~~led~~ masterplan.

2. Mechanisms for effective delivery of infrastructure will be required to support the development. Infrastructure, as set out in the Infrastructure Delivery Plan, must be implemented alongside development in accordance with ***triggers and obligations*** ~~a Phasing Strategy~~ approved by the Councils***, subject to flexibility to ensure that it continues to meet the changing needs of the development and wider area***.

3. This policy allocates land for 3,150 new homes within the Harborough District with associated infrastructure as set out below.

Masterplan

4. The masterplan for the site must meet the masterplan requirements set out at Appendix 6 and include:

a) Phased delivery of approximately 4,000 new homes, of which ***at least*** ~~3,150~~ ***3,000*** are to be in Harborough District.

b) Provision of ***appropriate employment uses, services and a local centre providing jobs broadly equivalent to up to*** 5 hectares of new general employment land within Harborough District.

c) ***Capacity for*** ~~Provision of~~ all required community infrastructure as set out below.

~~d) Provision of a site or sites of 5 hectares of land to meet the needs of travelling show people within Harborough District.~~

e) Provision of 3 hectares of land for cemetery provision in the District of Harborough.

4a. Provision of a site or sites of ***up to*** 5 hectares of land ***on the site or in the broad area*** to meet the needs of travelling show people within Harborough District. ***Off site provision will only be accepted where:***

a) the alternative site provides for at least the same quantity of provision as required by the relevant allocation policy;

b) the alternative site is considered as sustainable with regards to access to the road network and services when compared with the site allocation for which it is a substitute;
c) the site can be developed within the same timeframe (or faster);
d) the site would meet the needs of the Showpeople it is intended to accommodate; and,
e) the site will not have an unacceptable adverse impact on existing neighbouring residential amenity, including noise from any commercial activities.

Delivery of new homes

5. Delivery of new homes must include:

a) Provision of older persons housing to include retirement housing, extra care and / or residential care housing in accordance with Policy HN04.
b) ***A proportion of new homes delivered as affordable homes compliant with the Policy HN01 up to a target of 40 per cent, subject to viability.*** ~~40 per cent of the new homes across the entire site delivered as new affordable homes in accordance with Policy HN01.~~
c) A mix of housing types, sizes and tenures for housing including bungalows and / or ground floor accommodation. All new housing provided must be in accordance with Policy HN02.

Community Infrastructure

6. Delivery of the following community infrastructure is required to serve the new development***, in doing so applicants should consider the potential for multi-use facilities, co-location of provision and community access to services:***

a) Provision of a new Local Centre providing shopping facilities to include local retail, service, and food and drink facilities within a mix of small units. A retail impact assessment will be required as part of the master planning process.
b) ~~Provision of~~ a ***Capacity for*** new Primary Health Centre and wider NHS healthcare services, to be located within or adjacent to the new Local Centre.
c) Provision of a new community hall and leisure facilities, to be located within or adjacent to the new Local District Centre ***or as part of co-located provision***
d) Provision of sports pitches, children's equipped play areas and other outdoor recreational facilities, serving identified needs, along with new open spaces ~~in accordance with~~ ***informed by*** the relevant standards set out in the supporting text to this policy.
e) ***Provision of capacity to meet the educational needs of the site, with pre-school, primary school and secondary school demand met on site in full with capacity to meet wider strategic growth needs for secondary school provision if required. The Applicant should produce an Education Delivery Strategy to be approved by the County Council which considers options for meeting these requirements which will include the provision of new schools meeting DFE standards and may include the expansion of existing schools. This will include mechanisms for equalisation of contributions from other sites which rely on the capacity of the site, or from other public bodies where it is to meet basic need, which will cover land and capital costs. This will also include mechanisms for securing forward funding where a school is expected to provide wider capacity in advance of other developer contributions being secured.***

Site specific requirements will be based on relevant County Council yields, at a minimum the Masterplan should demonstrate capacity for:
• Up to 6 forms of primary school entry including early years provision, with locations based on ensuring walkable access from all parts of the site;
• Up to 8 forms of Secondary School Entry, noting that demand for up to 4.5 forms of entry is likely to be generated by the site.

The delivery of school provision will be phased with the development and monitored to ensure that it continues to meet requirements.

~~Provision of education facilities to meet the primary and secondary needs arising from the site. Provision of sufficient land for an 8-form entry secondary school, including post 16 provision to accommodate wider strategic growth needs and 5 forms of entry primary school provision, including early years provision. Other developments or public funding will be required to contribute to the costs of any provision that is not required to meet the needs of the site. The Applicant should produce an Education Delivery Strategy in conjunction with the County Council to be approved by the Councils which considers options for meeting these requirements which will include the provision of new schools meeting DFE standards and may include the expansion of existing schools.~~

Environment and Design

7.The following environment and design aspects must be adhered to.

a) The development must illustrate the highest standards of design through submission of ~~a Design Code(s)~~ ***Design Principles*** as part of the masterplan ***and a Design and Access Statement with Design Codes for each part of the development as it is brought forward.***
b) Development must respect and maintain a physical and visual separation between the village of Great Glen and the urban area of Oadby to prevent coalescence and protect the individual character and identity of each settlement.
c) Development must provide an extensive, integrated and well-connected network of managed public open spaces, green spaces and ecological corridors, including along the existing hedgerows and woodland areas and through the creation of an Area of Separation within Harborough District. Particular attention should be given to the enhancement of the River Sence and Wash Brook Corridors landscape and habitat through the restoration of natural vegetation and the creation of wetlands.
d) Development must retain and enhance the comprehensive Green and Blue Infrastructure Networks ***where possible***, including existing woodland, spinneys, and hedgerows throughout the site to create an immediate mature setting for new development and to integrate the development with the surrounding landscape.
e) Landscaping should be designed to, ***where possible,*** screen potential views ~~to the development, particularly in~~ ***from*** visually sensitive areas which include Wash Brook Valley footpaths, the eastern slopes ***of*** ~~near~~ the River Sence corridor, and the ~~southern~~ fields ~~adjacent~~ ***to the immediate south of the Listed Building at Stretton Hall.***
f) Development must provide an extensive, integrated and well-connected network of managed high quality sustainable methods of movement spaces, including LTN 1/20 footpaths and cycle ways, as well as high quality walking and wheeling routes. The network must connect the entire new development site, as well as the existing urban areas.

g) The southern half of the site is in the catchment zone of the Kilby Foxton Canals SSSI, and any development must demonstrate that the drainage arrangements will not cause significant impact to the designated site;

h) A contaminated land and Unexploded Ordnance assessment will be required to address the potential risk arising from agricultural development and former Ministry of Defence land which forms part of the site; and

i) A noise impact assessment will be required to address potential impacts and mitigation arising from aircraft movements associated with the nearby Leicester Airport.

Heritage

8. The following heritage aspects must be adhered to:

a) Development must be informed by a Heritage Impact Assessment and should respect the nearby heritage assets and their settings, including sensitive views towards Stretton Magna Deserted Medieval Village, St Giles Church, Stretton Hall and other listed buildings and structures.

b) No development can take place within the Stretton Magna Deserted Medieval Village and an appropriate buffer for the enhancement and protection of this site must be provided; the area of this buffer should be informed through the Heritage Impact Assessment.

Transport

9. The following transport aspects must be adhered to.

a) The strategy for the site must be informed by a Vision and Validation led approach promoting sustainable transport modes to, from and within the site, and demonstrate how the components of the strategy can build up over time to support the development;

~~a)~~ **b)** Development must include comprehensive sustainable transport links across the entire site as well as linking to existing local networks to provide good connectivity into the urban area of Oadby, areas within Harborough District and Leicester City.

~~b)~~ **c)** Impacts on the wider strategic and local highway must be mitigated. The impacts will be informed by a ***sustainable*** Transport Assessment that sets out off site and on-site transport measures to mitigate impacts from the development.

~~c)~~ **d)** High-quality safe cycle and pedestrian routes must be provided throughout the development to link new residential areas with the key facilities and services on site including the Local Centre, community facilities, health provision, and schools. Routes must connect to existing nearby networks as well as other adjacent allocated sites.

~~d)~~ **e)** Development must include safe vehicular access points from the A6 and Gartree Road, with a connection across the site. The entire site should be accessible from each access point.

~~e)~~ **f)** There must be provision for a frequent (minimum 15-minute) ~~zero~~ ***low*** carbon bus service connecting the site with the wider service network, as well as other sustainable public transport solutions.

~~f)~~ **g)** There must be provision of an appropriate number of bus stops and associated infrastructure, including bus shelters and information display boards on-site. Travel Plans incorporating measures to encourage more sustainable travel behaviours will be required. ***These could include Mobility Hubs to incorporate cycle parking, car clubs, and other low carbon transport modes.***

Flood risk and water management

10. A site-specific Flood Risk Assessment will be required to show that the development will not put the site at an increased risk of flooding in the future and does not increase the risk of flooding off site and / or downstream including any water discharge to Kilby Foxton Canals SSSI. The assessment must include a carefully considered and integrated flood resilient and sustainable drainage design, with a Surface Water Drainage Strategy and SuDS maintenance and management plan.

Utilities

11. The necessary utilities, including wastewater, water supply, electricity, and ~~gas~~ ***fibre*** network must be provided. The phasing and occupation of development should align with the delivery of ~~sewerage~~ ***utilities*** infrastructure, in liaison with service providers.

Delivery and Phasing

12. The site will be brought forward supported by ***an illustrative*** masterplan which addresses the policy requirements set out above and ***provides the framework, alongside the broad triggers for the provision of infrastructure, for key phases to be identified and delivered throughout the development which specify the location of that*** ~~clearly identifies the phases of development, and the location and timing of the provision of all~~ key infrastructure in accordance with the Infrastructure Delivery Plan within and beyond the plan period.

12a. Viability may be reviewed on a phase by phase basis using an agreed method to determine the infrastructure and affordable housing content of each phase.

13. For the avoidance of doubt, if this policy is silent on an aspect or issue, the relevant policy within this Local Plan must be used. ***This policy requires submission of a Design Code(s) as part of the masterplan therefore Policy 2.1 of the Oadby and Wigston Local Plan does not apply to this allocation***.

Supporting Text

5.9. This policy and associated site allocation is aligned with both Council's development strategy to focus new mixed-use development in and around the Leicester Urban Area. New homes and jobs are to be delivered on this cross-boundary site allocation, within the District of Harborough and the Borough of Oadby and Wigston known as Land South of Gartree Road.

5.10 The defined site boundary will be identified on each Council's Adopted Policies Map as SA02 in the District of Harborough and as AP5 in the Borough of Oadby and Wigston. The site is located within close proximity to Leicester City and is well placed to contribute towards provision of sustainable development and the site will provide for approximately 4,000 dwellings across the site, with ***at least*** ~~3,150~~ ***3,000*** new homes ~~and 5 hectares of employment land~~ within Harborough District, and at least 850 homes in the Borough of Oadby and Wigston.

5.11. It is anticipated that approximately 1,200 new homes will be built out within Harborough District during the Plan period up to 2041, with further new home provision occurring beyond the

Plan period post 2041. Both Local Authorities are committed to working collaboratively and with all relevant organisations to ensure that a sustainable and integrated development is delivered.

5.12. This joint policy has been developed collaboratively by both Councils and is reflected in both Local Plans. Further arrangements for joint working governance between the two Councils, the site promoters and all other partners is being set out and agreed as part of a Memorandum of Understanding and/or Statement/s of Common Ground.

5.13 The new development will create a high-quality and sustainable extension to the existing urban area and Stretton Hall, but also, will maintain a visual and physical separation between the settlement ~~of~~ ***and*** Oadby. Separation will also be afforded to the existing village of Great Glen through the creation of a new Area of Separation in Harbough District, which will prevent coalescence and will protect individual character and identity of the settlement.

5.14. This policy is designed to balance growth with sustainability, protecting the natural and historic character of the local areas while ensuring that new development provides the infrastructure and services needed for a thriving new community.

5.15. Due to its proximity to the existing urban area of Oadby, as well as the rural villages of Stretton Hall and Great Glen, the site already benefits from some access to public transport links into the City of Leicester. However, these existing routes will require investment and enhancement. This policy ensures that new development is thoughtfully designed, addressing key aspects of sustainability, community needs, and heritage preservation.

5.16. Retaining natural features such as woodlands and hedgerows helps blend the development into the surrounding landscape, supports biodiversity, and creates an immediate mature setting. Respecting nearby heritage assets like Stretton Magna Deserted Medieval Village and St Giles Church is essential for maintaining the historical integrity of the area. Landscape design also plays a crucial role in reducing visual impact, particularly in sensitive areas, and preserves the local scenic quality.

5.17 Addressing transport impacts is necessary to ~~manage increased traffic, ensure road safety, and~~ promote sustainable travel, ***ensure road safety and manage cumulative residual impacts on the road network***. Safe vehicular access, regular bus services, and high-quality cycle and pedestrian routes are vital to reducing car dependency and encouraging healthier, more sustainable modes of transport ***through a vision and validate approach***.

5.18. Reflecting the significant scale of growth as part of this site allocation, at least two accesses into the site will be required onto Gartree Road and at least one access into the site from the south onto London Road / the A6, to accommodate the volume of vehicle movement that will be generated in this location. The entire site must be accessible from each site access point, and the site cannot be parcelled off into separate elements that are not connected. Any detailed transport assessment should use the South Leicestershire Joint Transport Evidence (latest edition) as its starting point and should consider the necessary mitigation measures identified by the Study. Subject to the outcomes of this specific transport assessment work and collaboration with Leicestershire County Council's Highways Department, on-site highways and transport infrastructure and / or financial contributions towards off-site highways and transport infrastructure could be required to make the development sustainable. Environmental measures are integral, with green spaces and ecological corridors enhancing biodiversity and providing flood resilience.

Restoring habitats, particularly along the River Sence Corridor, not only supports wildlife but also contributes to carbon capture. Archaeological evaluations safeguard potential historical findings, ensuring that development does not come at the cost of heritage loss.

5.19 Phased infrastructure provision is essential to avoid straining existing services. By delivering schools, healthcare, and a local centre in tandem with housing, the development can meet community needs from the outset. Sports pitches and recreational facilities promote physical activity and community cohesion, fostering a healthy living environment for future residents. This would offer a high-quality recreational area for both existing and new residents, while improving biodiversity and habitat value. All open space provision and open space standards for the site, regardless of location, must ***be broadly consistent with*** ~~conform to~~ Harborough District open space standards ***although the Councils may agree bespoke approaches within the overall requirement where that results in a better outcome***. This is to ensure that the entire site, even areas within the Borough of Oadby and Wigston, has a consistent approach to open space provision.

5.20. This growth area is situated within walking distance of the settlement of Oadby to the west, as well as Stretton Hall and Great Glen to the east and south-east. The site is surrounded by open countryside to the north, east and south, meaning that it has the opportunity to enable positive health choices for all by encouraging walking, cycling and wheeling in the locale. Therefore, the creation and enhancement of the local cycling network and walking infrastructure routes in and surrounding the Site will be required, particularly those linking to and along the existing public rights of way network in and around the site.

5.21. Sustainable infrastructure investment of this nature accords with the objectives of Leicestershire County Council's Local Transport Plan 4 (LTP4), as well as the latest versions of the South of Leicester Area and Market Harborough Local Cycling and Walking Infrastructure Plans (LCWIPs). This will also allow inter-connectivity into the surrounding urban areas and open countryside, which in turn, will embed long-term low-carbon movement solutions for the new community that will live, work, and enjoy this new settlement in the future.

5.22. A site-specific Flood Risk Assessment (FRA) will be required and should inform and demonstrate that the Sequential and Exception Tests can be satisfied. It is essential that any development proposal demonstrates that there will be no increase in risk off-site, particularly along the Wash Brook where there are known flooding issues, and that it strives to take opportunities to provide betterment off site through measures such as flood-storage and oversized SuDS. The SFRA documents should be referred to with any formal planning application.

5.23 This Policy and the Infrastructure Delivery Plan for this Site will ensure that phased essential infrastructure provision will avoid straining existing services in the locale as the new community grows to its full and complete maturity. By delivering necessary education, highways and transport, healthcare, open spaces, sports and leisure facilities, biodiversity and habitat creation, and, other much needed community infrastructure in tandem with housing and employment growth, means the development can meet the new demands from the outset and for generations to come. ***Given the length of the development the plan will need to be applied flexibly to ensure that the needs of communities and changes of approach by public authorities to provision are appropriately met. Where the site is meeting wider strategic needs contributions from other developments will be sought to contribute to the costs of that provision in line with Regulation 122 of the CIL Regulations (2010, as amended).***

Appendix 2: U&C and Homes England Vision and Masterplan Principles

Land South of Gartree Road

Urban&Civic

Homes England

Vision report

July 2024

Contents

2019-FPA-XX-XX-RP-U-01001-P01

Revision History

P01	04.07.2024	Issued for Reg18 submission

Executive summary

Our vision for the Land South of Gartree Road is to deliver a new thriving, sustainable development that is inspired by its rich archaeological heritage and distinct landscape setting: a place that feels like it has always been there. With high-quality landscapes, the site will deliver open space and opportunities for play, alongside new schools and facilities for the new and existing local community. Our vision is underpinned by the following principles that will guide the future development:

Integrated connected neighbourhoods: A series of walkable neighbourhoods with clear hearts, connected to each other and the surroundings by strong active travel links.

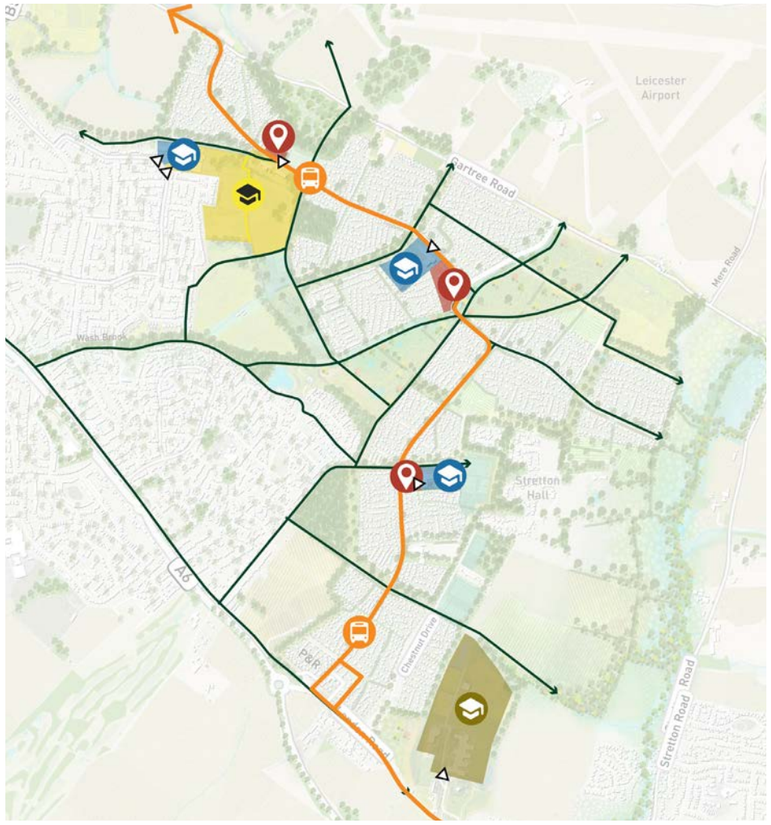
Amenity-led delivery: A commitment to early delivery of social infrastructure, to achieve placemaking excellence.

A productive and restorative landscape: A network of green spaces and routes, supporting healthy lifestyles, biodiversity, climate resilience, nature recovery and the wellbeing of the local community

Careful interfaces with nearby places: A commitment to maintaining green space with Great Glen and providing new and improved connections to Oadby while maintaining a green buffer through the delivery of a landscape corridor with a focus on education and leisure.

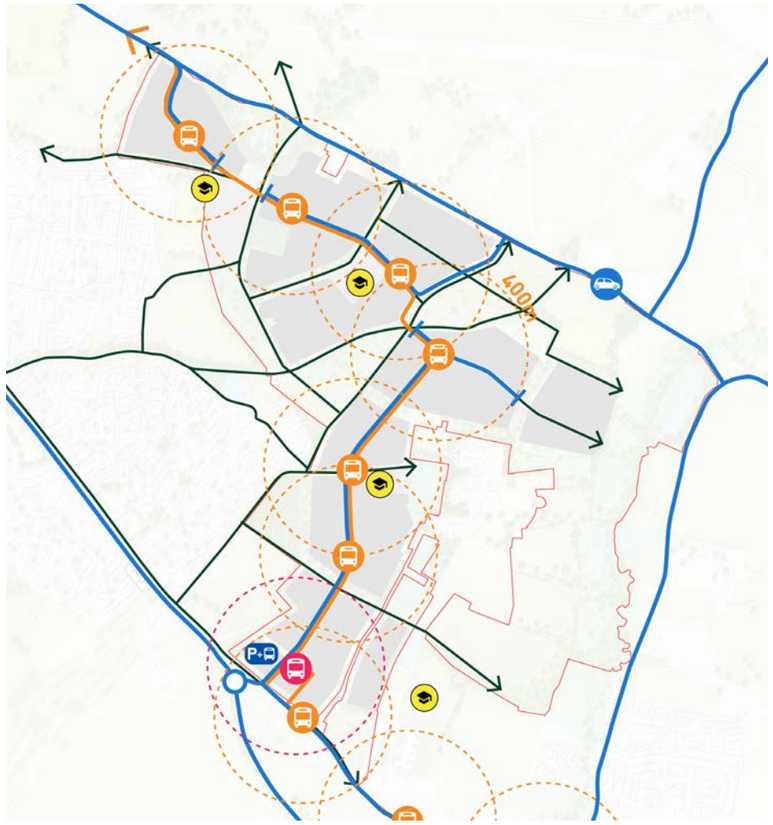
A low carbon community: Renewable energy generation and storage on site, to plan for a low carbon future.

Executive summary



The early proposals show two primary schools (one 2FE and one 3FE) as well as Secondary school provision. It is envisaged that local centres will contain local shops as well as community space and flexible working space.

The local centre and key community buildings will be located at key intersections on the main public transport route though the site and along the green links, providing excellent access for pedestrians and cyclist in car free environments.



The guiding principles of the walkable neighbourhood – legible and attractive paths and streets that connect to on-site services and local community hubs – guide the proposals. The network prioritises walking and high quality, attractive, and direct cycle routes.

A new bus route between Great Glen and Leicester passes through the site along the primary road via local centres and schools. Vehicular access to neighbourhoods is limited within the site area and restricting the possibility for through traffic from the A6 to Gartree Road.

The landscape proposals are underpinned by a unifying concept – "The Green Ribbon" weaving open landscape through the development.

Three new landscape corridors of distinct character are suggested – leisure/education, parkland and riverside – activated by a variety of natural and recreational uses for the benefit of the community. The river corridor maintains a clear green buffer with Oadby and Great Glen.

1. Introduction

About this report

This report has been produced by Fletcher Priest Architects for Urban&Civic and Homes England and summarises our emerging proposals for the Land South of Gartree Road supporting a Reg18 representation as part of the Local Plan process.

The project is in early stages and the aim of the proposals in this report is to show how a high quality place can be delivered within the constraints of the site. The proposals need to be further developed in consultation with local stakeholder and the community during the next stages.

Team
The work summarised in this report has been developed during April - June 2024 in collaboration with the wider professional team including:

Fletcher Priest	Masterplanning
Harrison Group	Geo-environmental
Headland Archaeology	Archaeology and Cultural Heritage
i-Transport	Sustainable Transport
PCA	Ecology
Planit	Landscape Architecture
Quod	Planning
ROC	Flooding, Utilities and Drainage
SLR Consulting	Highways
Texa Threat Solutions	UXO

This report contains a number of constraints plans that attempt to summarise the key findings of the wider consultant team. More details can be found in the executive summaries of their technical reports that are appended to the submission.

2. Site analysis and wider context

The site

The site known as 'Land South of Gartree Road' shown edged in red on the aerial opposite is approximately 377 hectares and is located within the administrative areas of both Harborough District Council and Oadby & Wigston Borough Council in Leicestershire.

The site is located to the east of greater Leicester between the edge of Oadby and Great Glen. The site includes the hamlet of Stretton Hall, a more recent development of the land associated with historic Stretton Hall country house.

A significant portion of the site consists of agricultural fields with two existing farms, the largest accessed from Gartree Road in the north and the other from Chestnut Drive. The field structure is marked by mature hedgerows and remnant woodlands (spinneys) within the rolling landscape that features a series of small valleys. The land generally falls from north to south and west, with a larger river corridor on the eastern boundary that follows the River Sence through to Great Glen.

There are three landowners: Homes England (with further land under option to HE) and Farmcare Ltd, owned by Wellcome Trust who are also owners of Urban&Civic.

KEY:

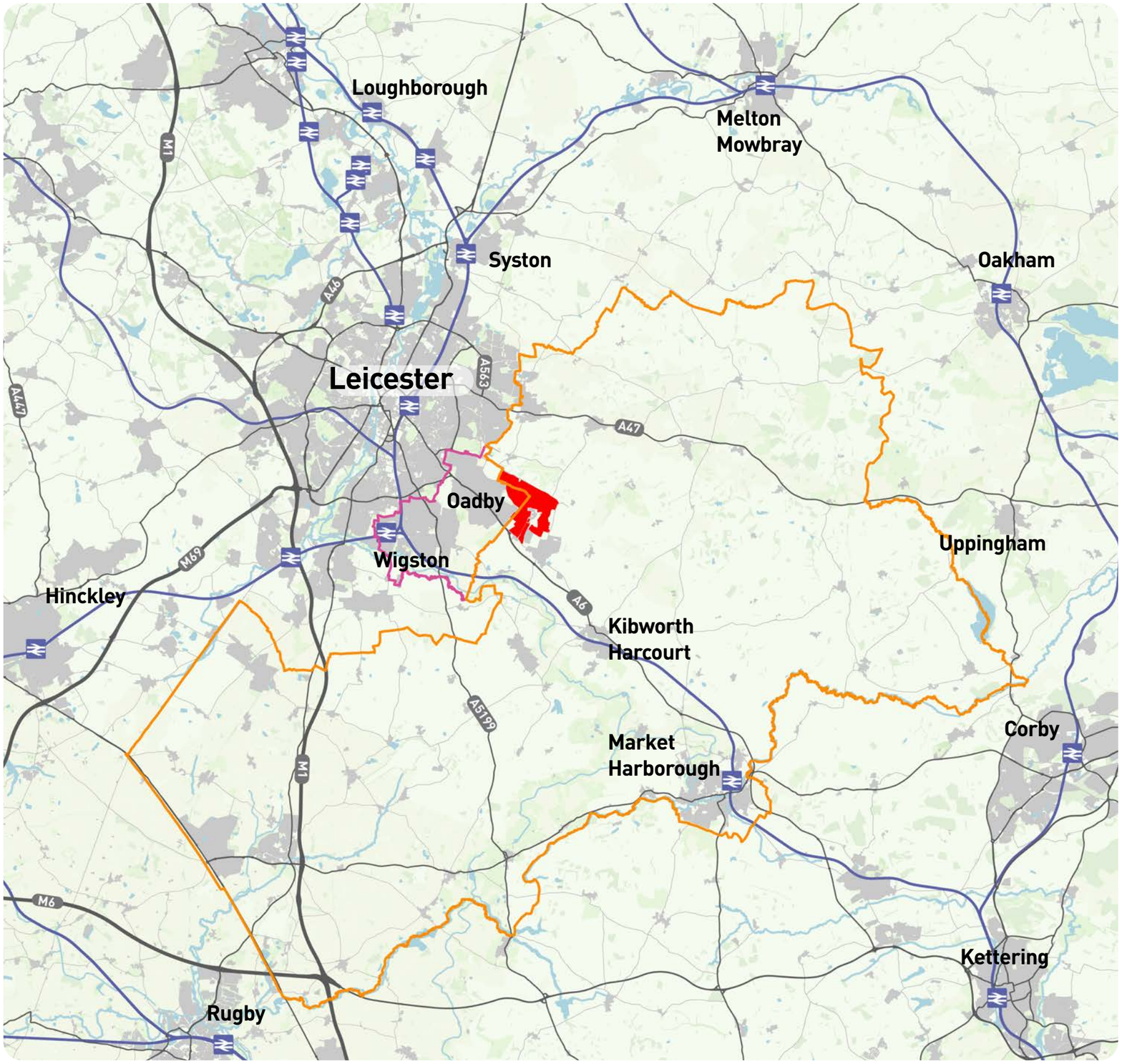
Site boundary

Administrative boundary (HDC/OWBC)

Wider context

The plan shows the full extent of both Harborough District Council and Oadby & Wigston Borough Council in the context of this part of Leicestershire. The site is adjacent to Leicester.

Heading SE from Leicester towards Market Harborough and Kettering there is both a railway and A6 highway. The closest railway station to the site is in South Wigston, or from Leicester city centre itself via a number of local bus services (refer to page 13).



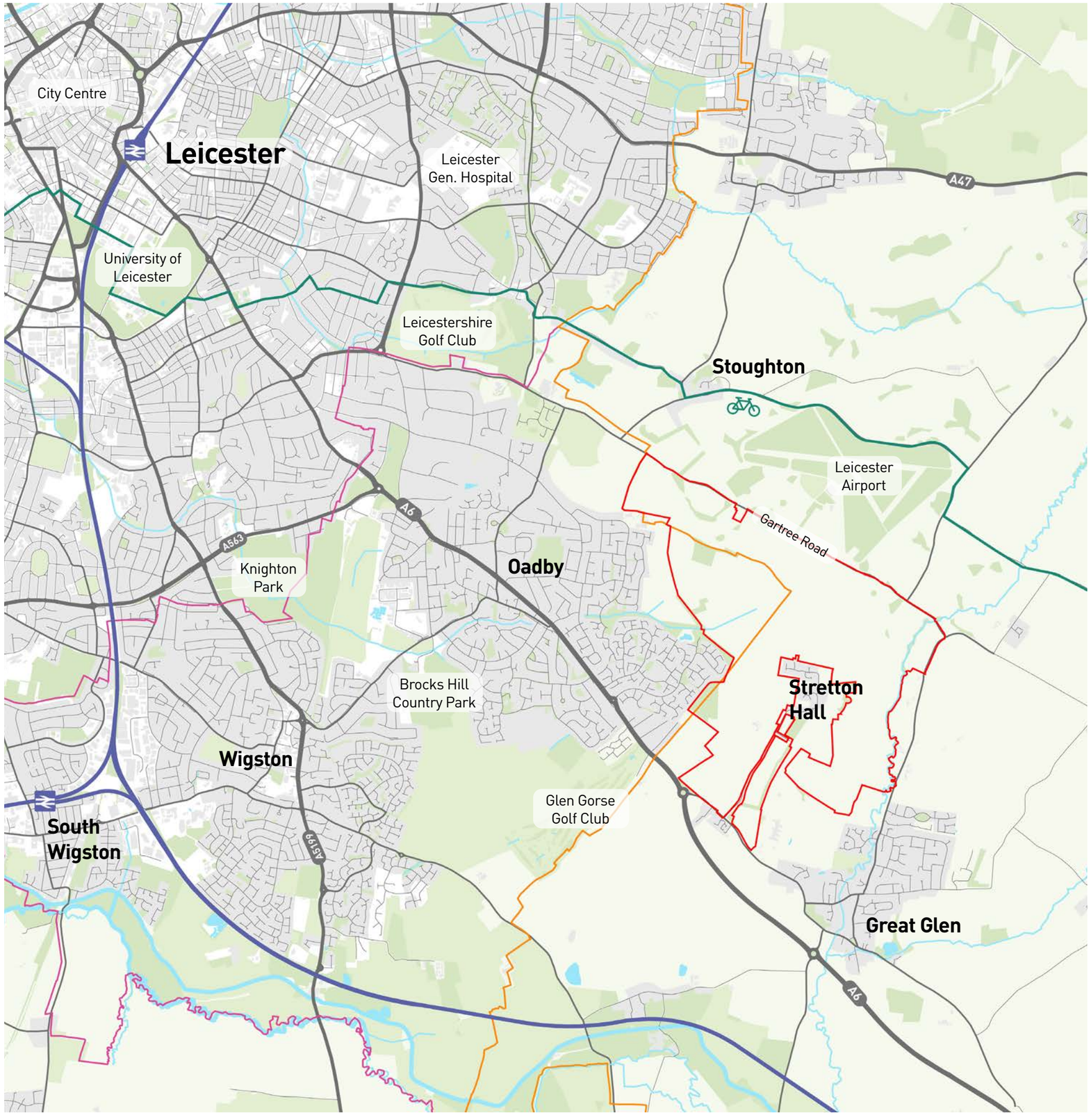
KEY:

- Site boundary
- Harborough District Council
- Oadby & Wigston Borough Council

Strategic context

The site is located adjacent to the edge of the Leicester Principal Urban area, a sustainable location for growth.

The site is bounded by Gartree Road to the North, the A6 to the South, Oadby to the West and the River Sence to the East. The site wraps around the settlement Stretton Hall. Directly to the north of the site is Leicester Airport.



KEY:

- Site boundary
- Harborough District Council
- Oadby & Wigston Borough Council
- National cycle route no. 63

Site characteristics

Mature landscape features with coherent field structure

Landscape buffer to Oadby with glimpses of built form

Pedestrian connections from Oadby

Undulating topography along valley landform

Gartree Road along the northern site boundary

Surrounding built form

Typical street view of post-war housing estate in Oadby

Bus stop along Florence Wragg Way

Pedestrian connections from Oadby

Gorse Lane at the eastern edge of Oadby

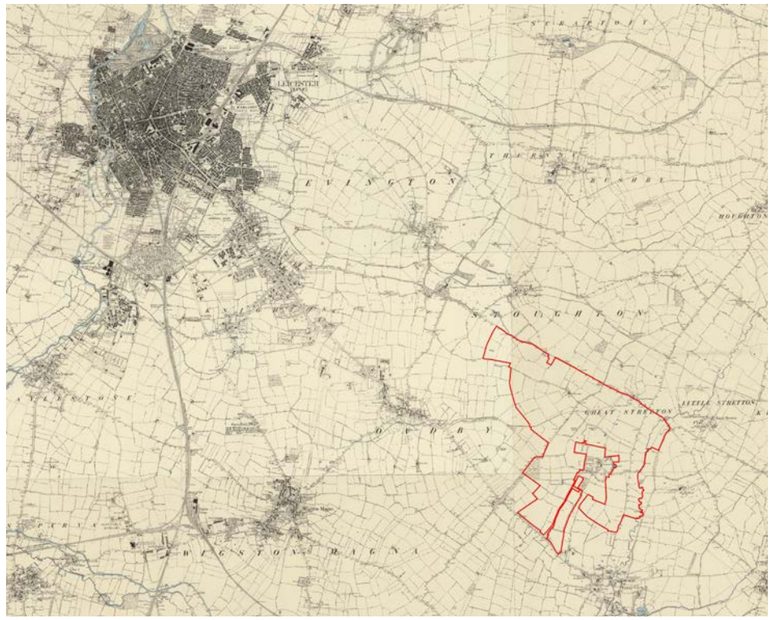
A6 road corridor with large format supermarket

Homes on Stoughton Road to the western end of Oadby

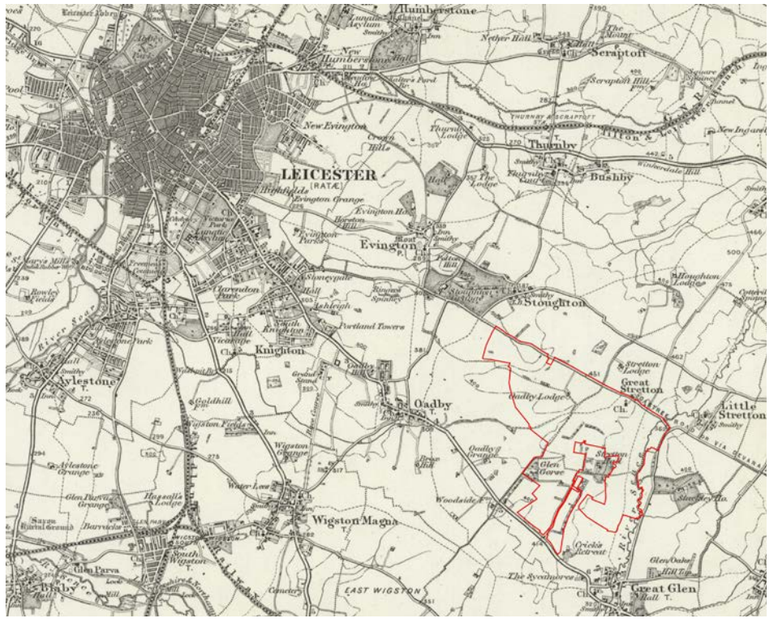
Historic mapping

As a sequence of historical mapping from the late 19th Century through to today, these maps illustrate the growth of Leicester along its main rail and road arteries, along with the rapid post-war suburban expansion into the countryside.

The aerial photograph to the bottom right clearly shows the gap between Oadby and Great Glen, which the proposed development will maintain by the preservation and enhancement of the River Sence landscape corridor.



1885



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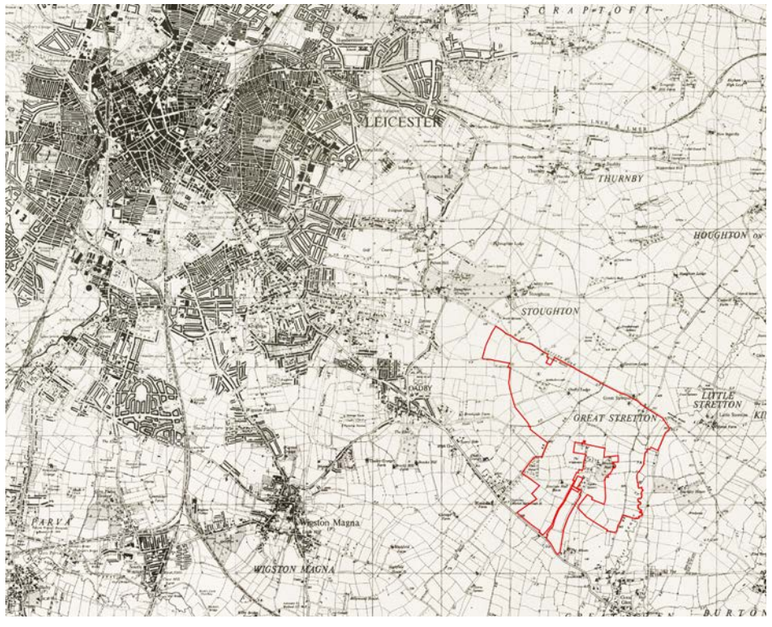
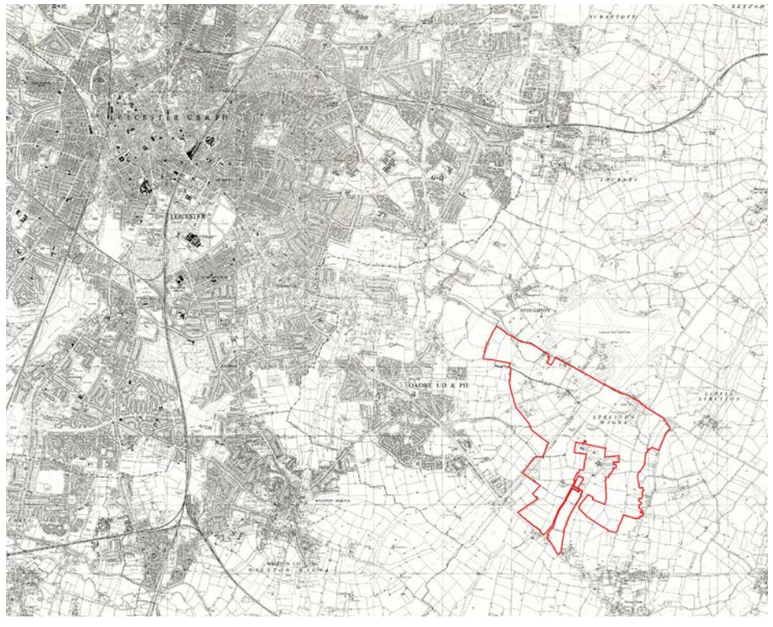


Immediate post-war



1967

2024

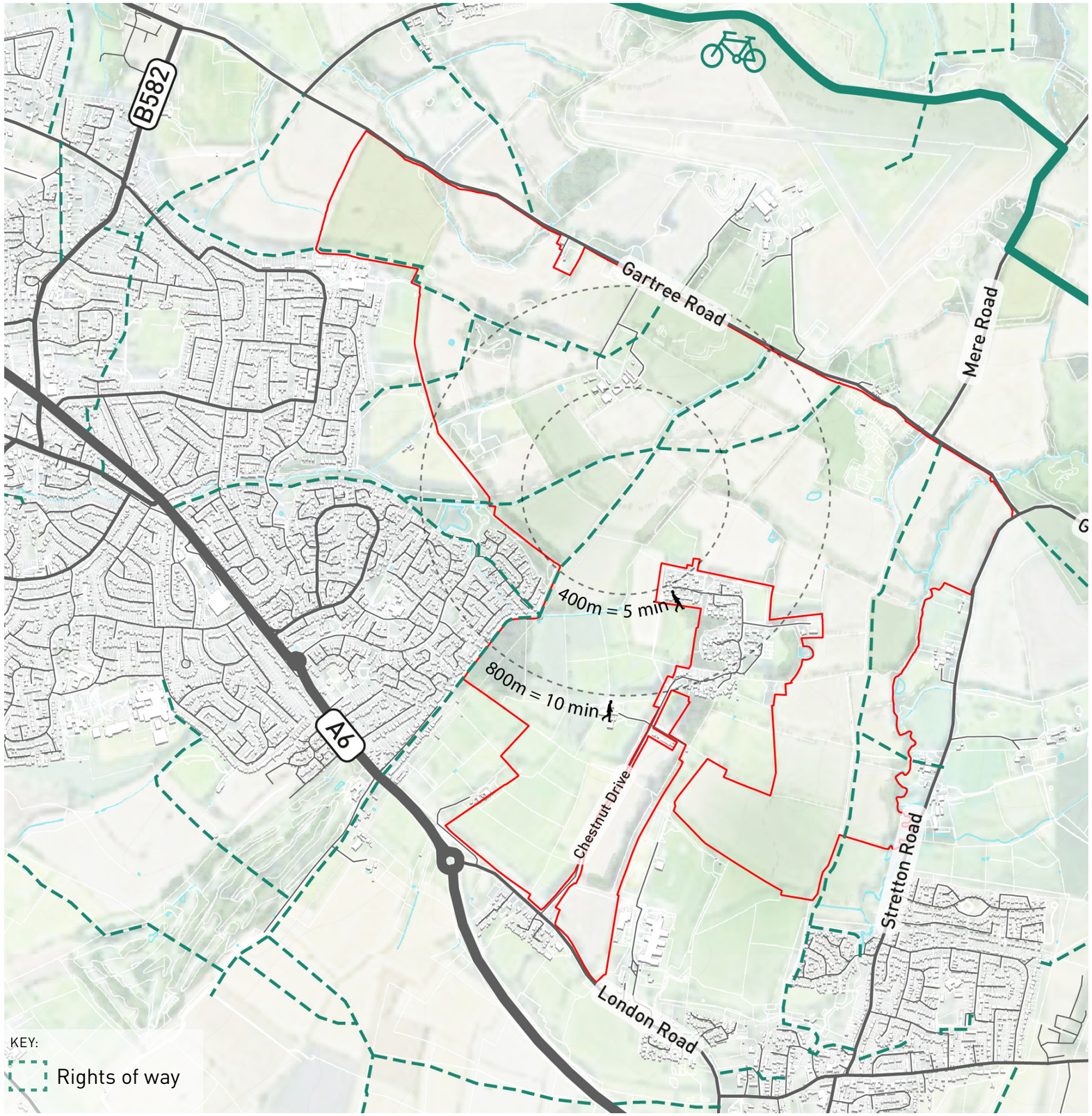
Existing connections

The main road connection is from the A6 along the southern edge of the site via the London Road that continues to Great Glen from a roundabout junction. Chestnut Drive provides local access to Stretton Hall only.

There are a number of public rights of way that follow the edge of the site and intersect through the site itself, particularly coming from the south-west through Oadby. The majority of these terminate at Gartree Road.

There are opportunities to improve the routes into Oadby as part of the development of the site, creating safe and lit pedestrian and cycle links. These are currently low grade and often overgrown.

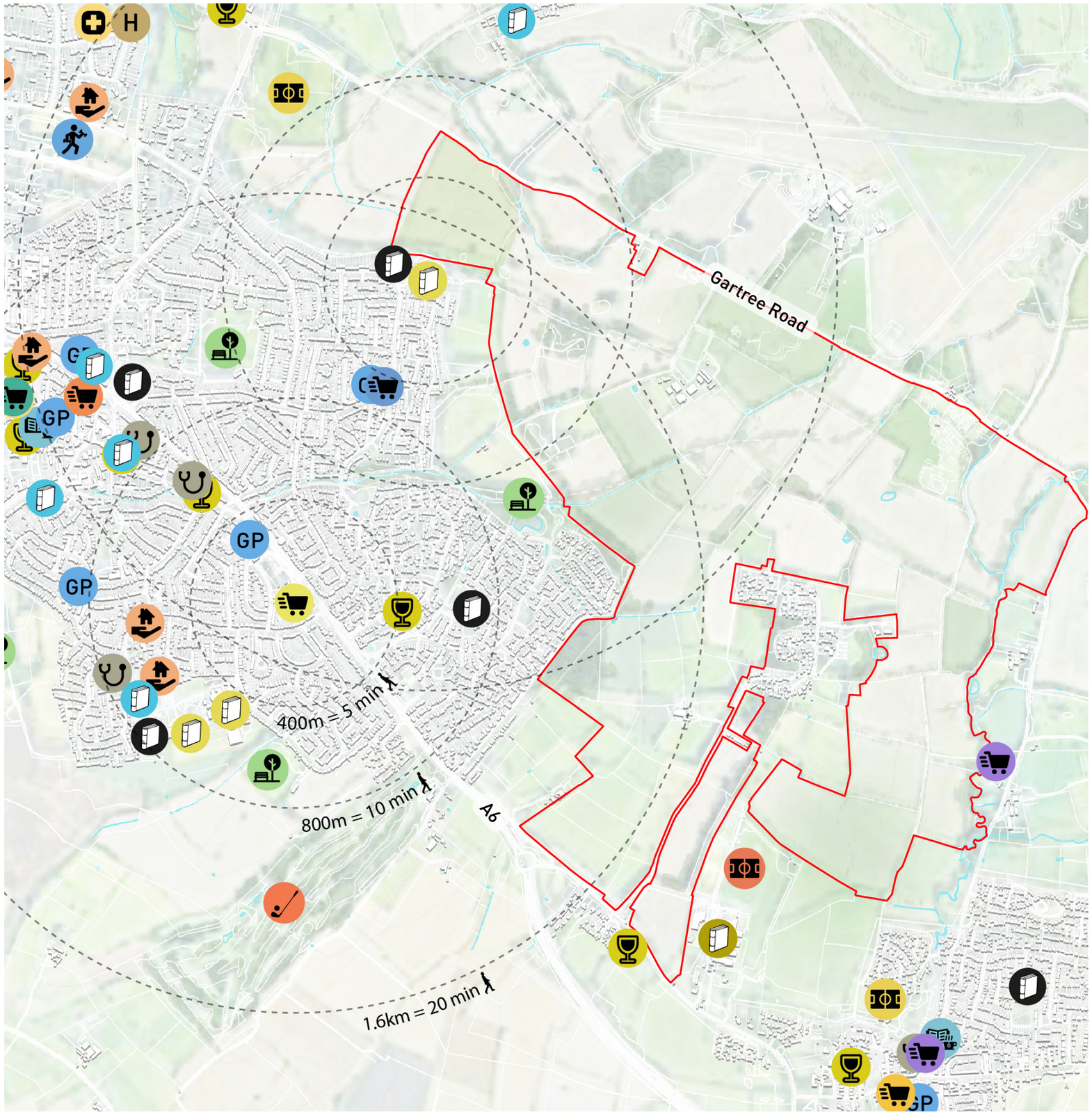
Further detail is set out in SLR and i-Transport technical reports.



Existing amenities

Most shops and amenities are in the population centres of Oadby and Wigston. There are some local shops and pubs, including within Great Glen. Stretton Hall has no local amenities. Oadby features smaller green spaces with the largest being Uplands Park. There are several schools nearby, including Leicester Grammar School and Manor High School.

- Nursery
- Secondary school
- Grammar school
- Primary school
- Hospital
- Private medical centre
- Public NHS GP
- Other - dentist, optician etc
- Care home
- Pubs
- Supermarkets
- Parks and gardens
- Sporting fields
- Golf course
- Library

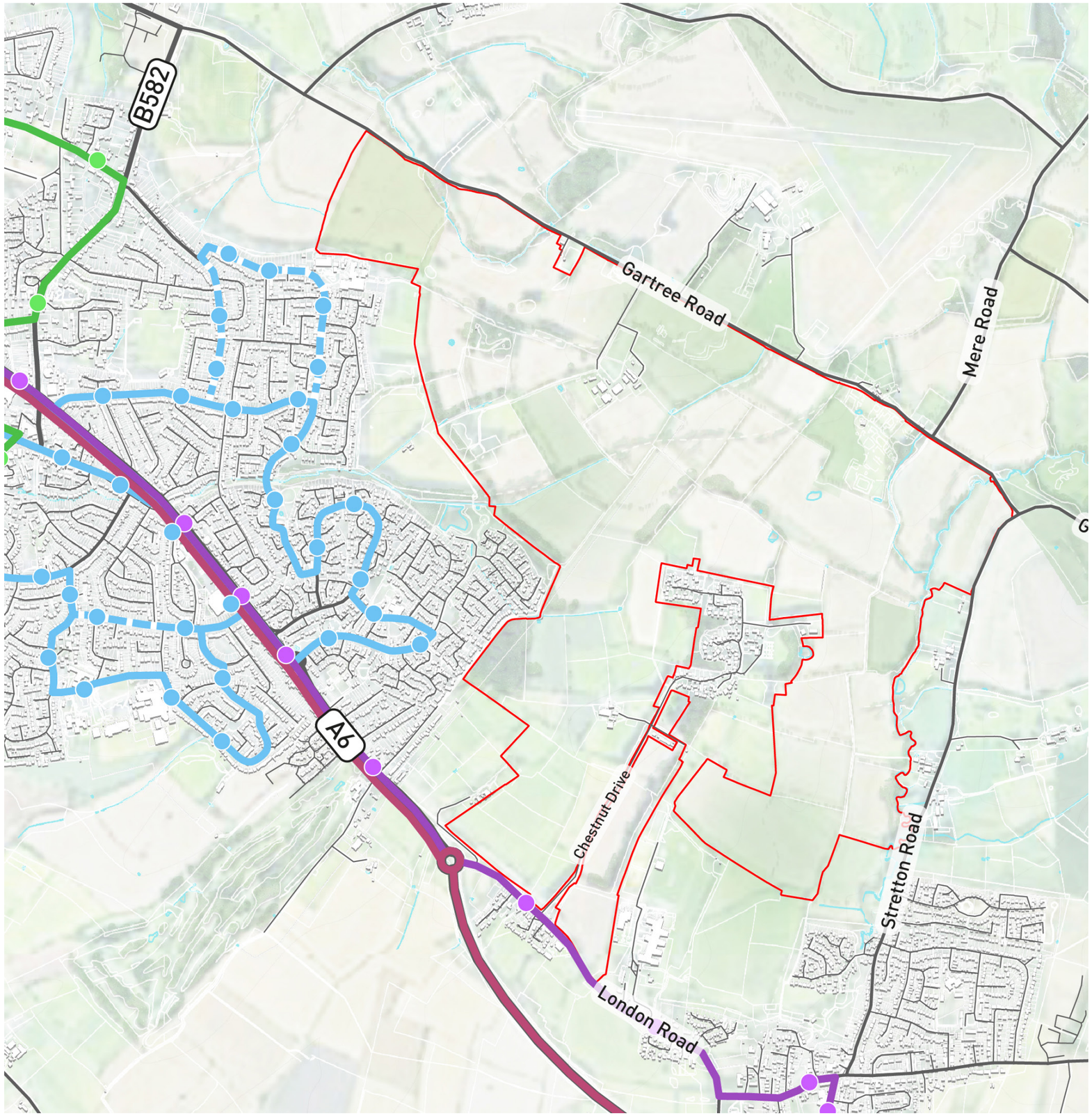


Existing bus services

There are 4 bus routes that pass the site along the A6 road corridor. The X31 and X3 continue through to Market Harborough from Leicester city centre, while the 31/31A and 40 routes are more local services.

The X3 and 31/31A routes are the only bus services that detour from the A6 and services the local area of Oadby, including the Manor High School.

Further detail is set out in the i-Transport Technical Evidence document.



Route 31/31A Leicester-Oadby	Every 30 minutes (Mon- Sat) Every 90 minutes (Sun)
Route 40 Orbital	Hourly (Mon-Sat) No service Sunday
Route X31 Leicester to Market Harborough	Two per day weekdays No service weekends
Route X3 Leicester to Market Harborough	Hourly (Mon-Sat) No service Sunday

Topography and existing landscape features

The local area is characterised by an established complex landscape structure, which offers a rich mosaic of open fields, hedgerows, woodland blocks and the locally distinctive spinneys.

The site has a gentle rolling landscape, with open views of the countryside. There are well-defined valley features, stretching towards Oadby and linked to smaller watercourses, including Wash Brook. The topography leads to a gradual fall into the River Sence corridor, creating a natural pathway for the watercourse.

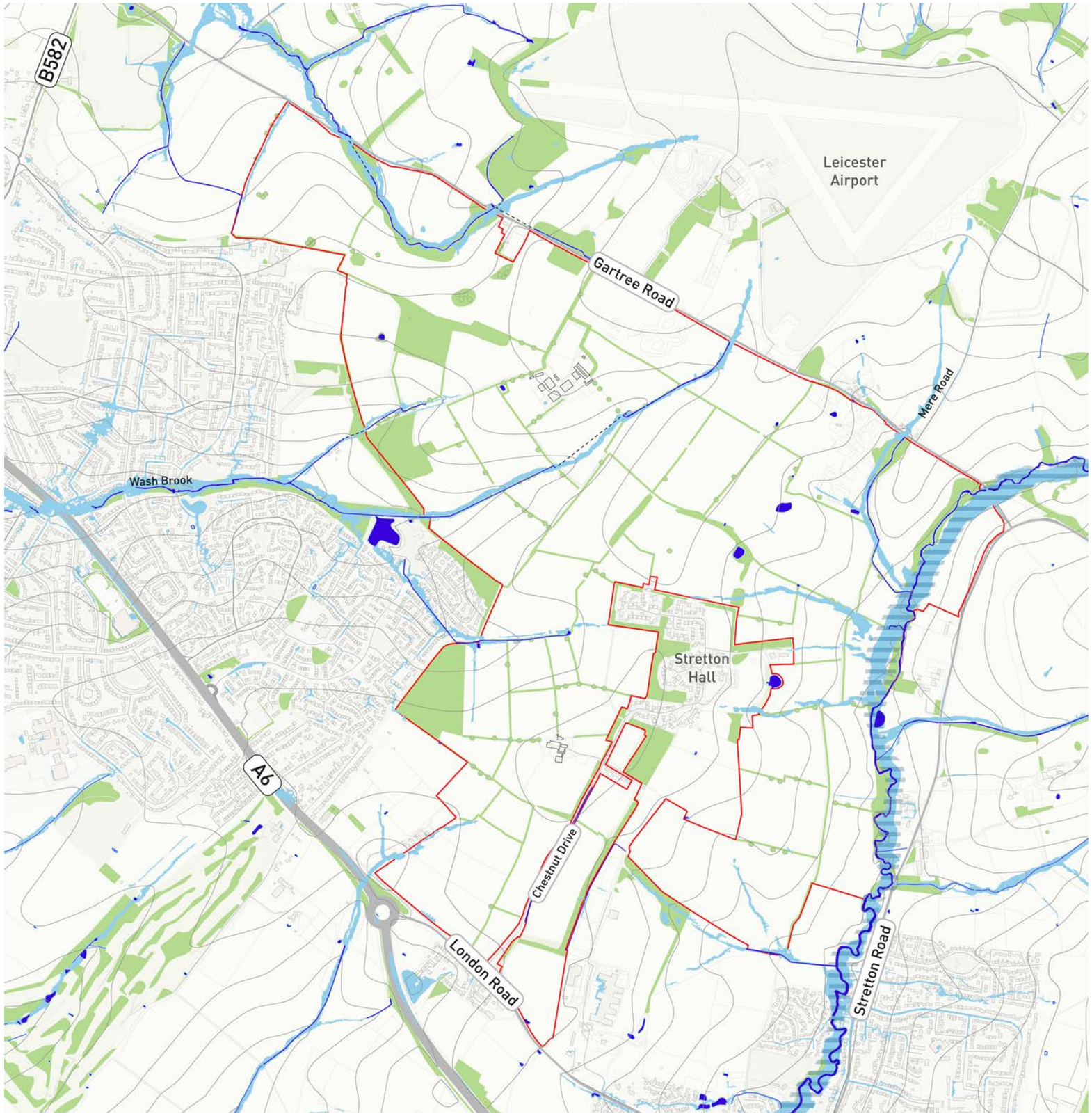
Areas of high ground and an upper ridge are present within the landscape of the site and present a challenge in relation to possible views in from the surrounding areas and existing settlements. This combination of valleys and high points create variety in the landscape and presents a key consideration for the screening or creation of landmarks within future development.

Hydrology

The diagram illustrates the existing waterbodies and watercourses in the local area, some of which is culverted through the farming areas. The risk of fluvial flooding to the site is low.

In terms of pluvial flood risk, the 100 year surface water flooding event shows on the plan is generally limited to the immediate extent of watercourses, with a greater spread through the River Sence corridor that is also constrained by Flood Zone 2 & 3. It is anticipated that surface water this can be managed by manipulating proposed levels and installing new surface water drainage.

Further detail is set out in the Flood Risk Assessment & Outline Drainage Strategy by ROC Consulting, including potential sustainable drainage systems.



KEY:

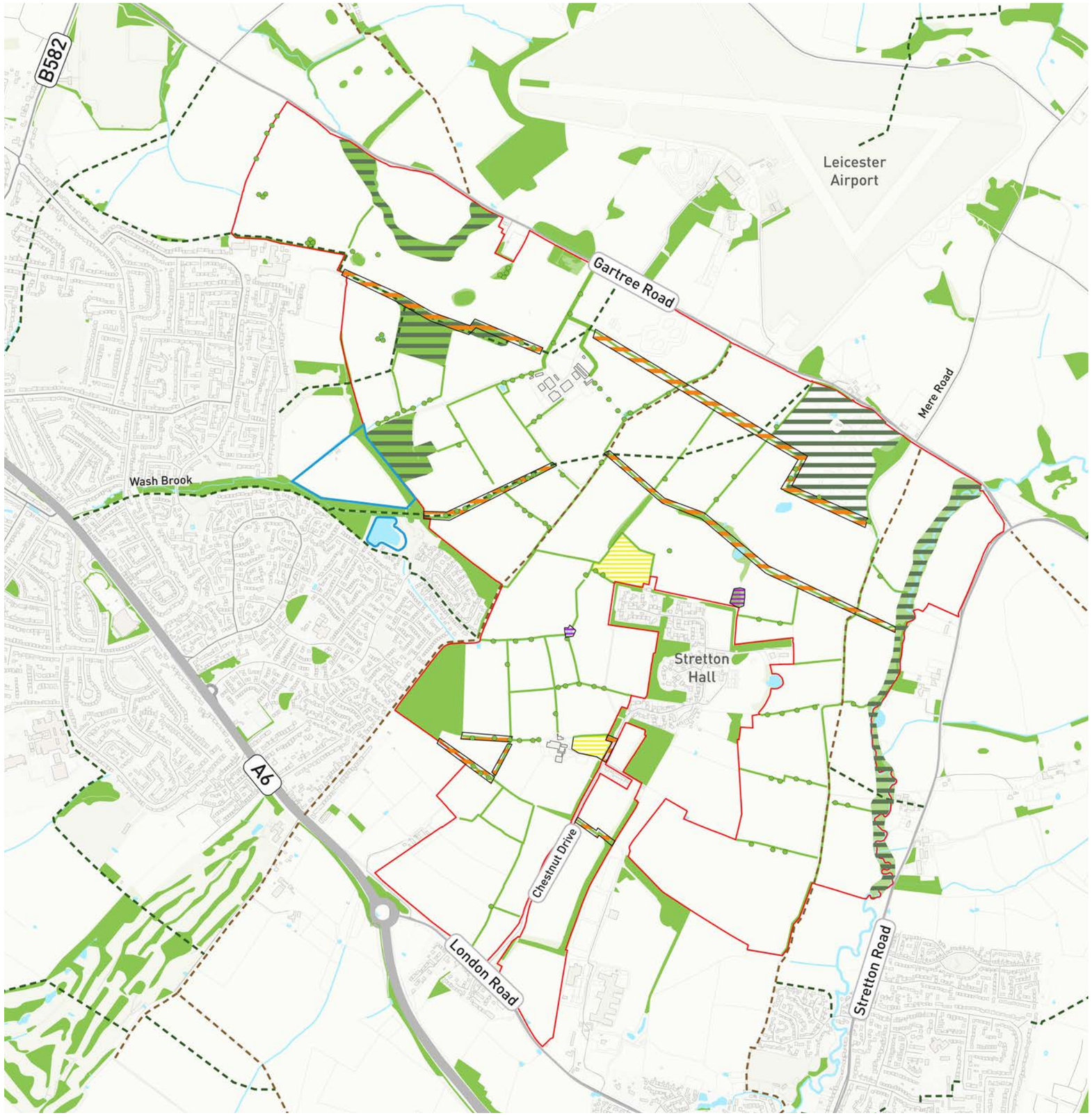
- Flood Zone 2 & 3 extent
- 100 year surface water flooding (pluvial)
- Waterbody
- Watercourse
- Culvert

Biodiversity and ecology

The plan opposite identifies biodiversity opportunity areas and higher quality hedgerows to be protected. Also identified are two distinctive fields that show evidence of ridge and furrow farming.

The biodiversity opportunity areas lend themselves to more extensive and targeted biodiversity enhancement measures as well as an important recreational resource for the local community. Biodiversity conservation will be a primary objective for these areas.

Further detail of baseline conditions, discussion of BNG and key opportunities is set out in the Biodiversity Considerations report by PCA.



KEY:

- Possible biodiversity opportunity area
- Medium-high quality hedgerow
- Distinctive fields
- Badger setts
- Adjacent wildlife areas
- Public footpaths
- Bridleways

Landscape character areas

The plan opposite is an indicative characterisation and description of the landscape. It identifies distinct patterns and elements that create local distinctiveness and gives the landscape its unique sense of place.

Large field pattern

- Predominantly for growing crops
- Green buffer to existing settlement

Medium, regular field pattern

- Gently sloping levels and expansive views
- Scattered spinneys and woodlands
- Field boundaries with hedgerows and associated with minor watercourses (ditches)
- Land with footpaths for recreational use/ connection to surrounding countryside

Medium, irregular field pattern

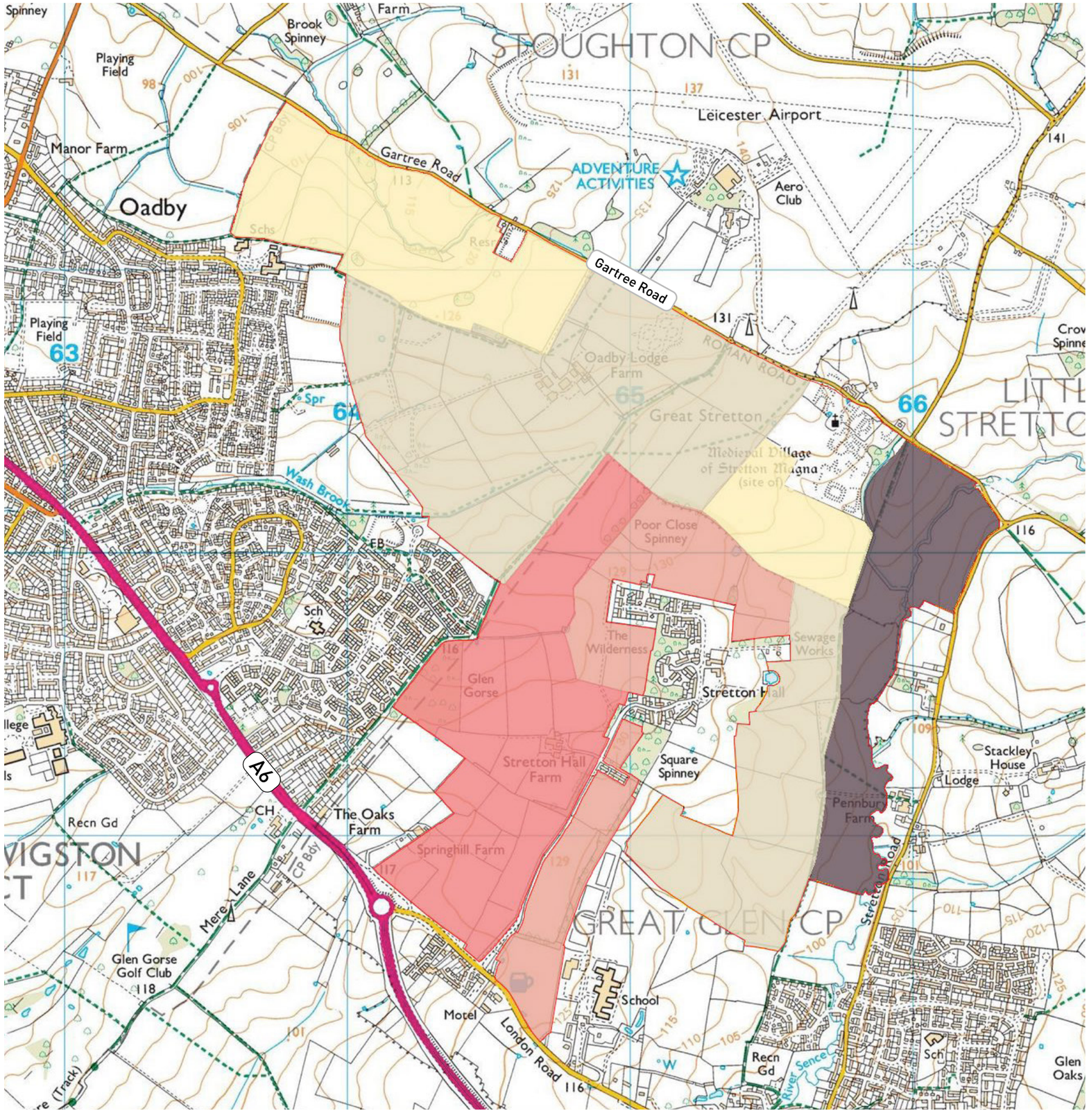
- Rolling landform
- Scattered farmsteads, minimal development

Settlement edge

- Urban influence and well-enclosed
- Erosion from new development

River Sence Valley

- Sloping topography
- Woodland wetland and flood-zone



KEY:

- Large field pattern
- Medium, regular field pattern
- Medium, irregular field pattern
- Settlement edge
- River Sence valley

Development visibility

The diagram opposite illustrates the visibility of a 10m high building in 6 locations spread across the site. This shows the higher visibility of the northern areas of the site, both from parts of Gartree Road and also from Stretton Road looking west across the River Sence valley.

① Public rights of way - these typically have a rural character with short range views across fields - contained by dense hedgerows and woodland.

② Public roadways - glimpse views from Gartree Road into the site through existing hedgelines.

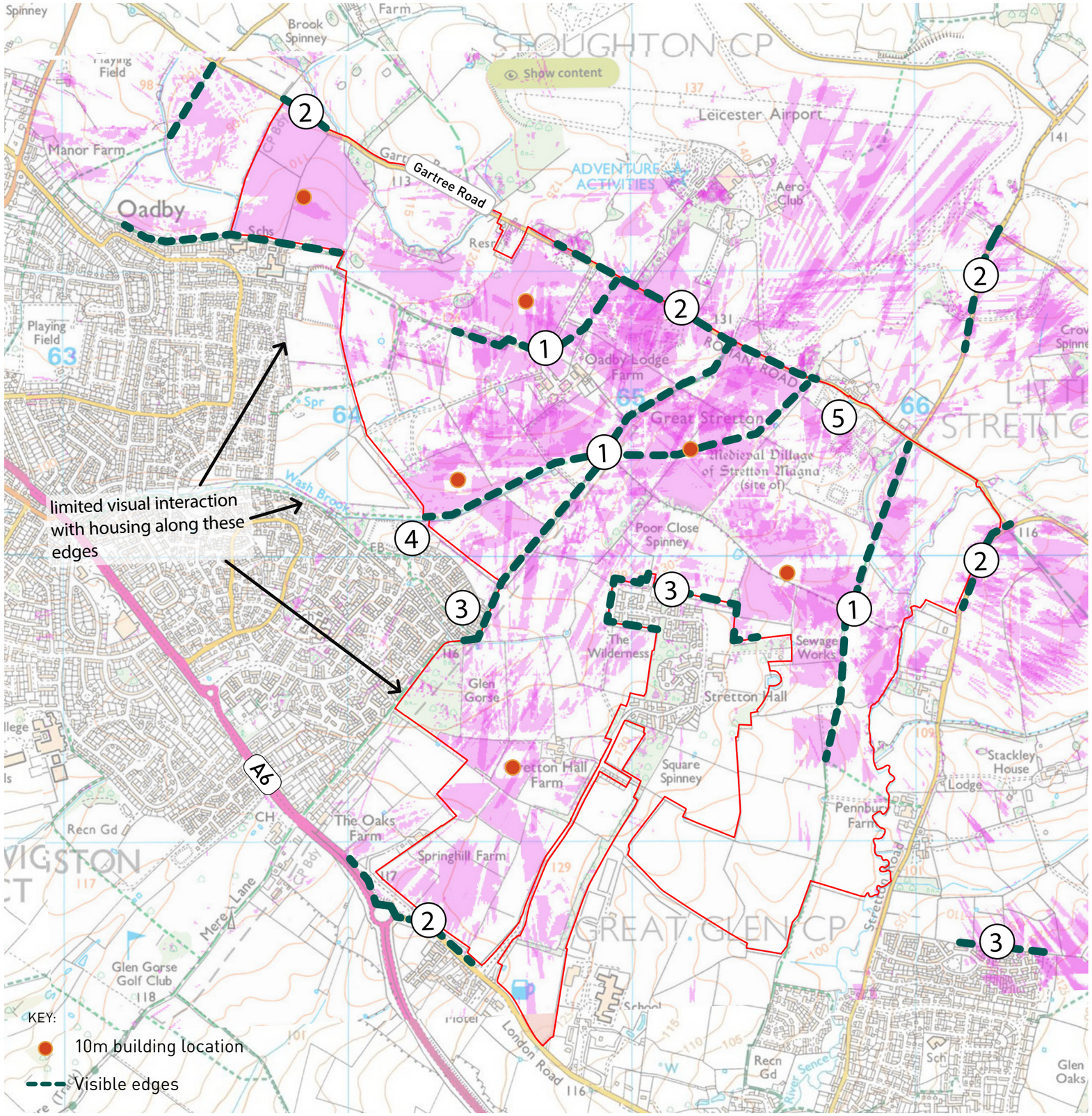
③ Housing - edges of established housing - whilst not common - some homes face out onto the surrounding open landscape

④ Nature Reserve - very limited views in immediate field context.

⑤ Medieval Village - open rural context to the site - elevated position with longer views over the surrounding countryside

Landscape strategies should seek to bolster the existing features with the following:

- View corridors with PRoW to be protected to maintain elements of the rural character along these key routes.
- Reinforce site edges to housing where strong landscape buffers will maintain the green context and character to these neighbourhoods.
- Reinforce field boundaries to provide screening to longer views across the site to reduce sensitivity of internal spaces.



Site interfaces

The plan shows the interfaces with key assets, including heritage assets and two schools adjacent to the site. It indicates the need for a buffer around and sensitive treatment of the interface with Stretton Hall, with details to be developed in future stages of the project.

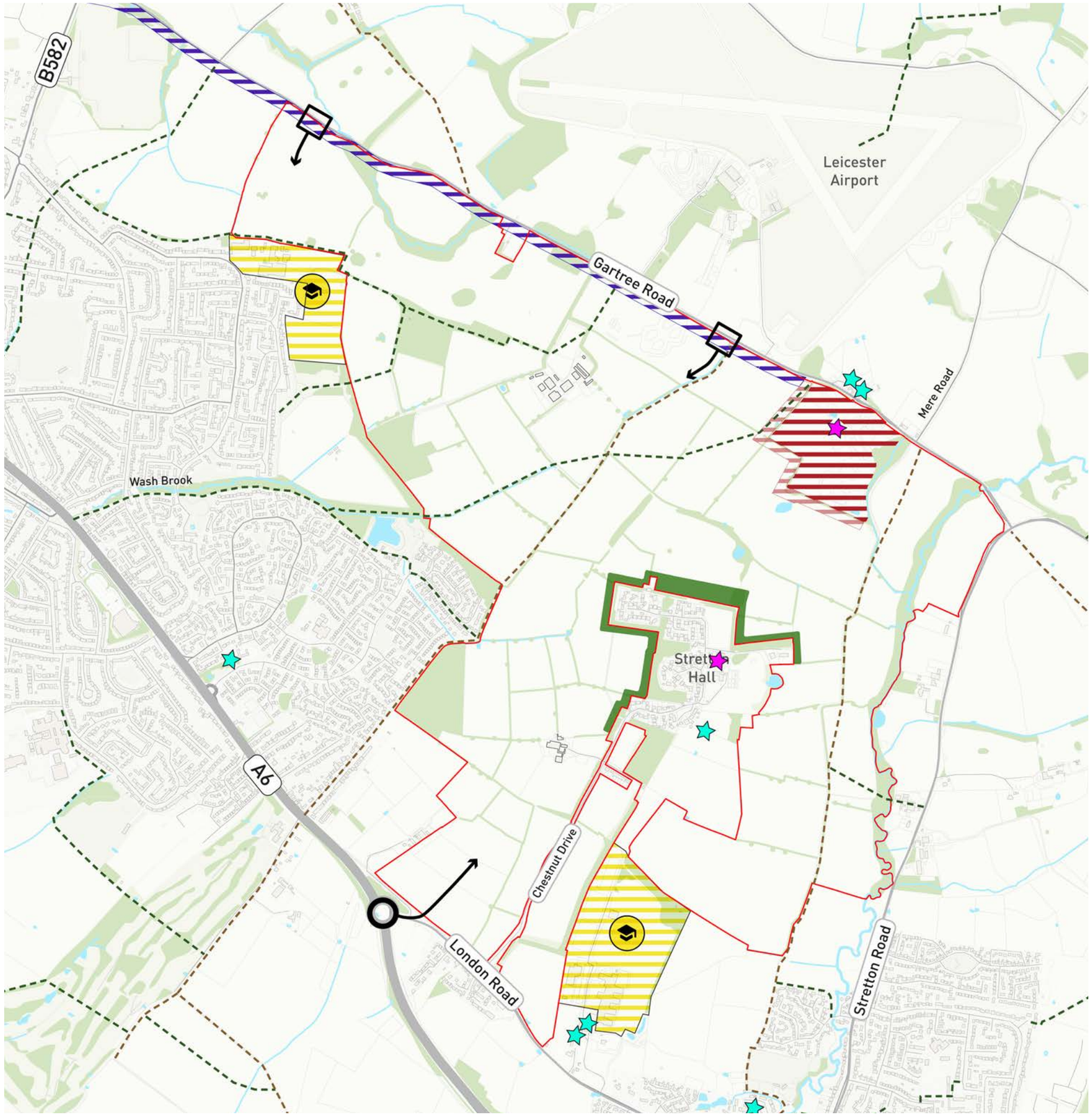
The Stretton Magna scheduled monument is located in the north east part of the site. It includes extensive earthworks of a deserted medieval village with a moated site, two fishponds and part of the associated field system. A 25m buffer has been allowed around this site and along the Roman Road. Within the centre of Stretton Magna is a Grade II* listed building (St. Giles's Church).

There are nearby listed buildings in the villages of Stoughton, Stretton Hall and Great Glen. Two listed buildings, both Grade II, lie adjacent to the northern site boundary. Farther afield are two Conservation Areas: at Stoughton and the North Memorial Homes and Framework Knitters Cottages in Oadby (both outside of plan extent).

Further detail is set out in the Archaeological Desk-Based Assessment by Headland Archaeology.

KEY:

- Stretton Magna scheduled monument
- 25m buffer to Stretton Magna site
- 25m buffer to Roman road
- Indicative buffer to Stretton Hall
- Adjacent schools
- Identified access points
- Grade II* listed building
- Grade II listed building



Utilities

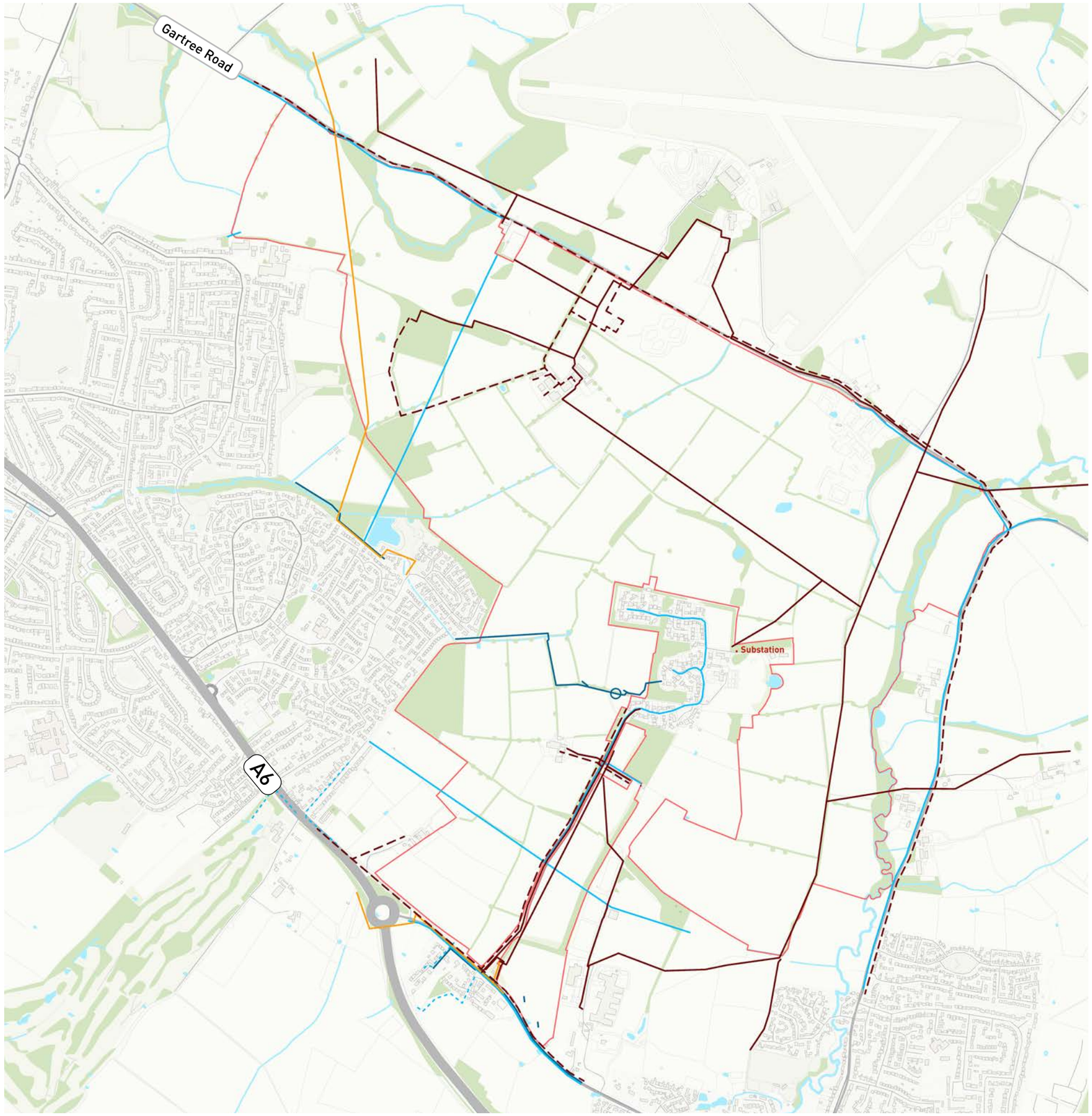
The plan shows the existing utilities that cross the site.

A large diameter MP gas main is routed across the north west section of the site. Two large diameter water mains cross the development site.

The working assumption is that they are retained in situ with easement distances and build proximity distances maintained. For the purpose of the emerging masterplan an 8m easement to the gas main and 10m to the water mains have been assumed.

It is assumed that the 11kv overhead cables will be diverted as part of the development of the site.

Further detail is set out in the Utility Study by ROC Consulting that accompanies this submission.



KEY:

- Gas main (450mm)
- Water main crossings
- 11kv overhead power lines
- BT distribution
- Storm sewer
- Foul sewer

Land contamination

The plan opposite dates from 1955 and shows the historical farming activity and also former buildings that were part of a domestic military area and a dispersal (apron) associated with the former RAF Leicester airfield, operational between 1943 and 1945.

The contamination hazards have been preliminarily assessed to generally present a low and moderate risk, but some higher risks are related to activity around the farm yards, area surrounding the airfield dispersal, the historical domestic military buildings and roadways, and historical landfills.

The risk of encountering unexploded ordnance (UXO) can be mitigated during the next stages of the project by a Magnetometer Scan and clearance certificate to allow works to progress.

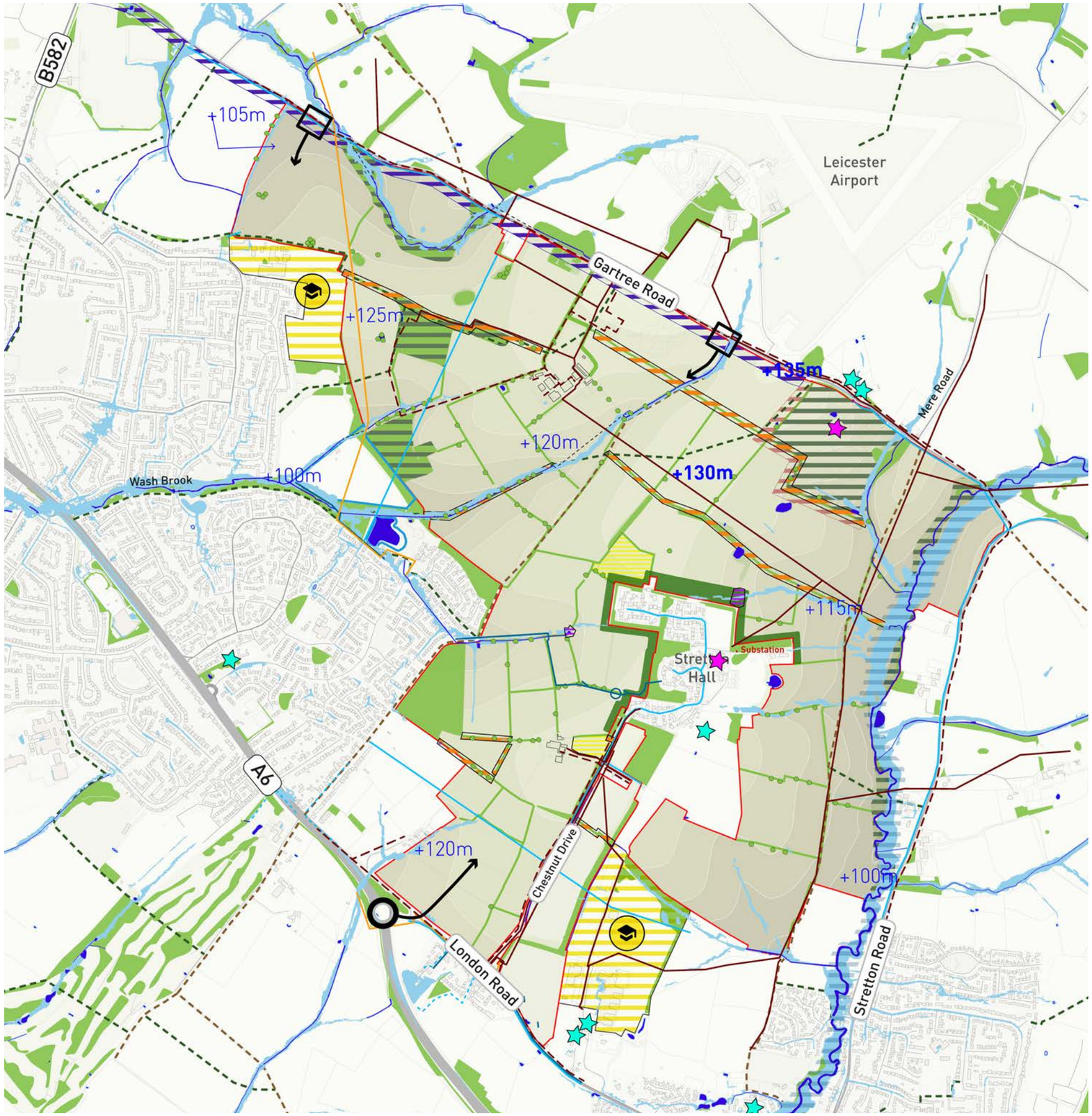
Further detail is set out in the Desk Study Report by Harrison Group and UXO Desk Study by Texa Threat Solutions that accompany this submission.

Key constraints

A summary of the key constraints which have informed the vision is provided to the right. This plan should be read in conjunction with the consultants' reports, which are appended to the submission.

KEY:

- Possible biodiversity opportunity area
- Med-high quality hedgerow
- Distinctive fields
- Badger setts
- Adjacent wildlife areas
- Stretton Magna scheduled monument
- 25m buffer to Stretton Magna site
- 25m buffer to Roman road
- Adjacent schools
- Indicative buffer to Stretton Hall
- Identified access points
- Flood Zone 2 & 3 extent
- 100 year surface water flooding (pluvial)
- Waterbody
- Watercourse
- Culvert
- Gas main (450mm)
- Water main crossings
- 11kv overhead power lines
- BT distribution
- Storm sewer
- Foul sewer
- Public footpaths
- Bridleways
- Grade II* listed building
- Grade II listed building



fletcher priest architects
london + köln + riga

3. Vision

Opportunities

The consolidated ownership provide a strategic opportunity for holistic development that can secure the necessary infrastructure to support development and facilitate exemplary placemaking and long-term stewardship. It also provides a unique opportunity for the repair, enhancement and extension of access to the natural landscape supporting a sustainable rural economy.

Key opportunities:

1. Comprehensive thinking across a significant area of land in consolidated ownership

2. An exemplar development with focus on placemaking, community building and long term stewardship

3. Protection of large areas of green space with potential for nature recovery and activation.

4. Critical mass to support infrastructure and services locally and phased delivery of new infrastructure.

5. Much needed homes in a location that can support good public transport and active travel

6. Existing connections to Oadby that can be improved

7. A distinct existing landscape that can create a framework for a characterful new place from day one

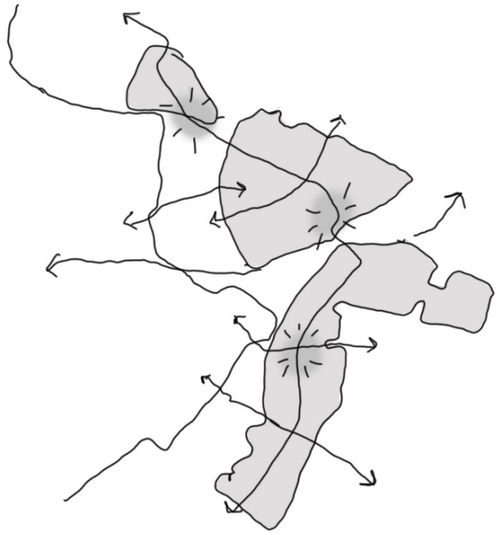
Vision

Our vision for the Land South of Gartree Road is to deliver a new thriving, sustainable development that is inspired by its rich archaeological heritage and distinct landscape setting: a place that feels like it has always been there. With high-quality landscapes, the site will deliver open space and opportunities for play, alongside new schools and facilities for the new and existing local community.

Emerging masterplan principles

Our vision is underpinned by the following principles that will guide the future development of the Land South of Gartree Road:

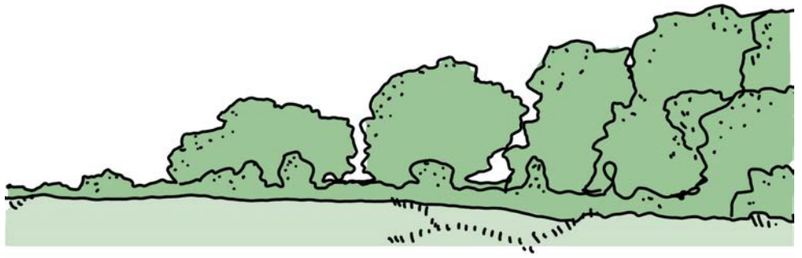
1



Integrated connected neighbourhoods:

A series of walkable neighbourhoods with clear hearts, connected to each other and the surroundings by strong active travel links.

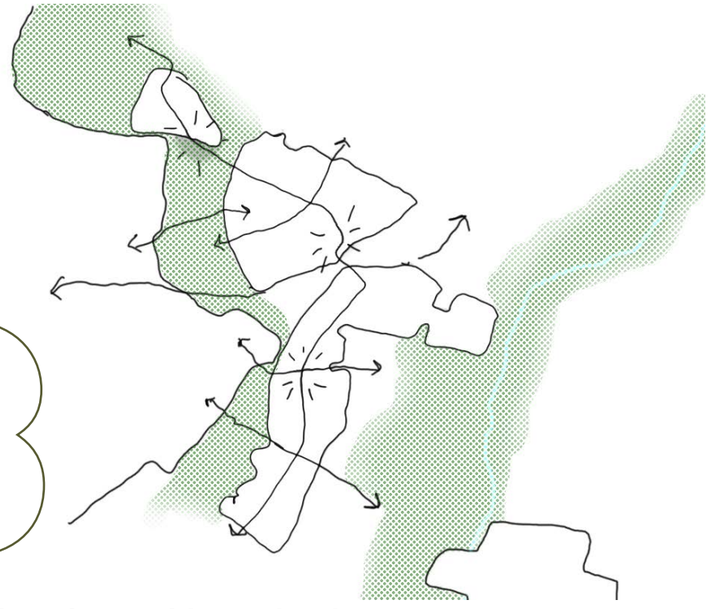
2



A productive and restorative landscape:

A network of green spaces and routes, supporting healthy lifestyles, biodiversity, climate resilience, nature recovery and the wellbeing of the local community

3



Careful interfaces with nearby places:

A commitment to maintaining green space with Great Glen and providing new and improved connections to Oadby while maintaining a green buffer through the delivery of a landscape corridor with a focus on education and leisure.

4

Amenity-led delivery:

A commitment to early delivery of social infrastructure, to achieve placemaking excellence.

5

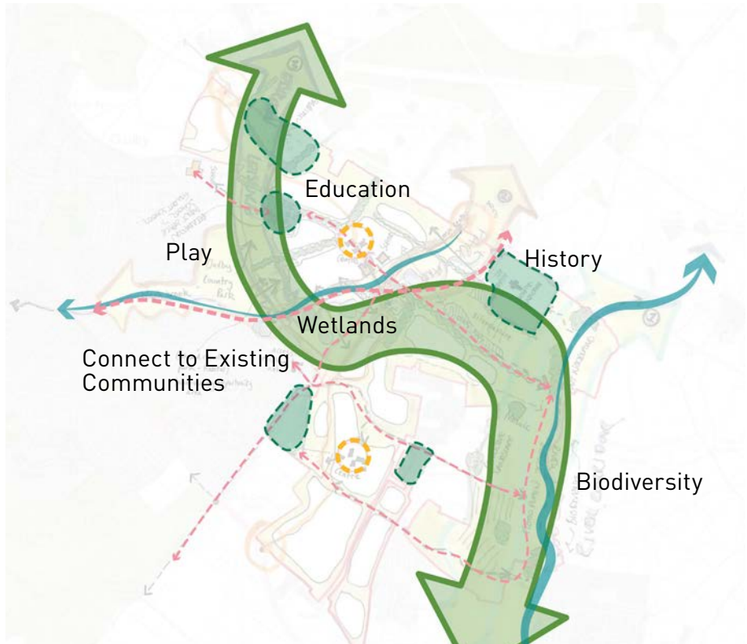
A low carbon community:

Renewable energy generation and storage on site, to plan for a low carbon future.

Landscape strategies

Three new landscape corridors of distinct character are suggested - leisure/education, parkland and riverside - activated by a variety of natural and recreational uses for the benefit of the community.

This is underpinned by a unifying concept - "The Green Ribbon" weaving open landscape through the development.

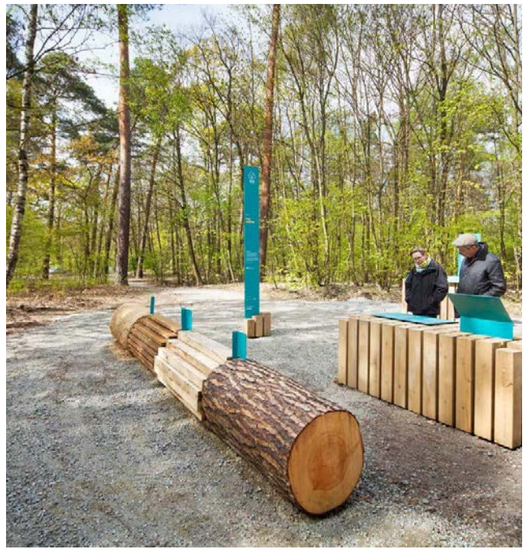


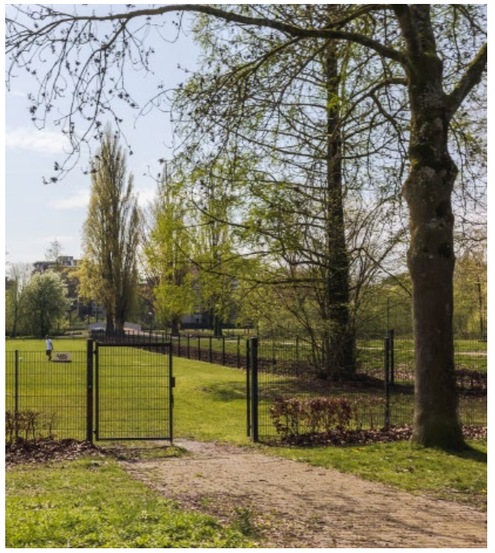
Underlying concept: The Green Ribbon

Leisure / education corridor

The spaces in this corridor have the potential to provide amenity to new and existing residents from surrounding communities and link with local schools. There are further opportunities for nature-based education.

- Opportunities for nature-based education and exercise.
- Connection to existing Manor High School and future school locations.
- A variety of educational and heritage led opportunities
- woodland play and education.
- Interconnected recreation routes (walking and cycling) with other corridors.

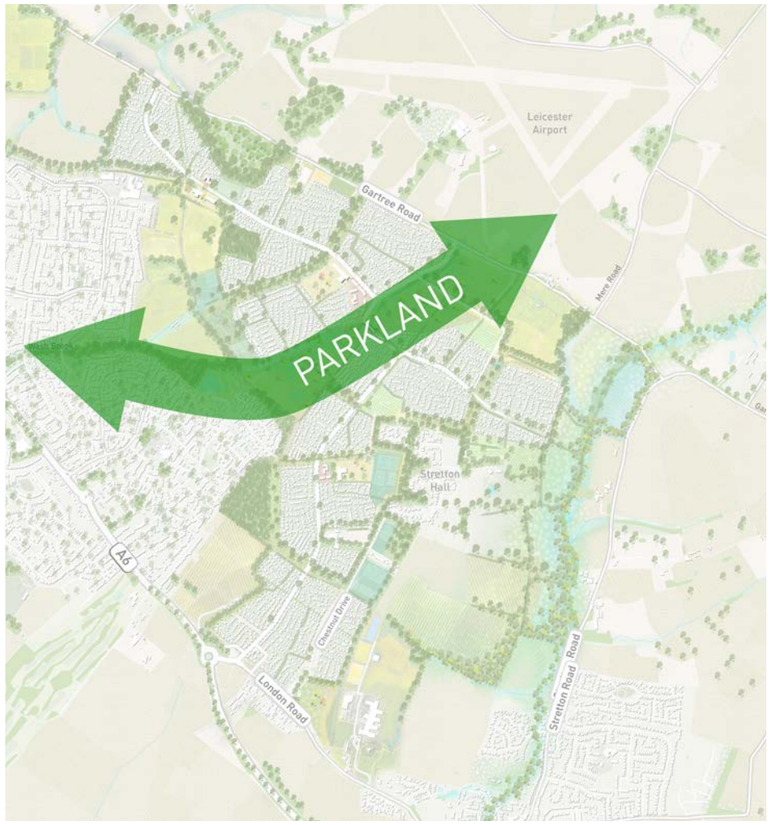




Parkland corridor

The Parkland corridor provides open land of recreational use with opportunity to provide outdoor exercise, walking/ cycling routes, heritage celebration, local centre and destination for the community,

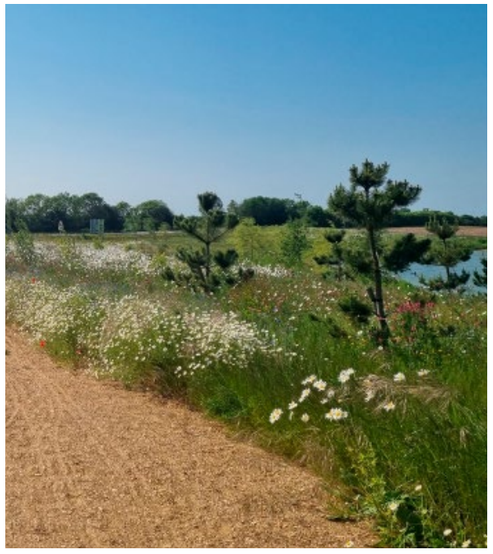
- Opportunities for multiple elements within the landscape, including recreation, public art.
- Heritage led opportunities including heritage reinterpretation, connecting to the medieval village / scheduled monument.
- Connection with future development parcels and local centre.
- Integration of existing PRoWs and landscape elements such as hedgerows and drainages, incorporating SUDs within the open space.



River corridor

Improved and new woodland/wetland habitat areas, wetland and natural play/recreation, community growing.

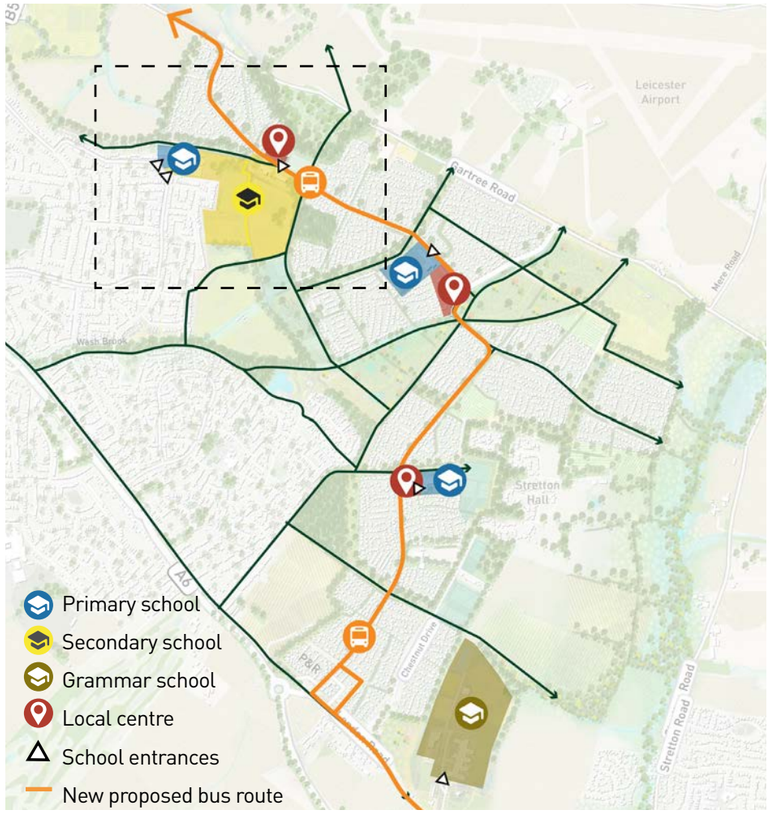
- Opportunities for community growing.
- Potential for wildlife habitat enhancements and biodiversity restoration area along the River Sence.
- Potential for grassland / meadows - introduction of historic, native Leicestershire meadow plants that are almost extinct - regeneration.
- Opportunity for regenerative productive landscape - silvopasture landscapes.
- Wet woodlands - rare habitats.
- Interconnected recreation routes (walking and cycling)

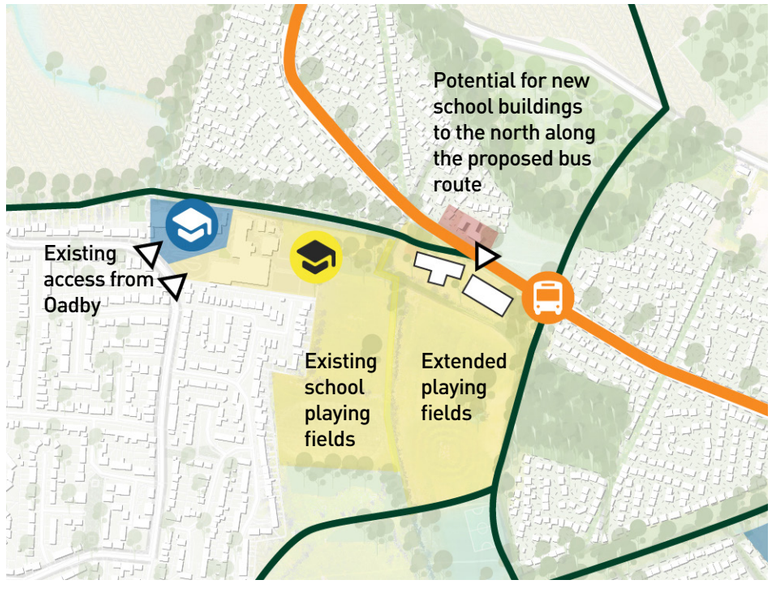


Local centres and community infrastructure

The emerging masterplan proposals show two primary schools (one 2FE and one 3FE) and flexible provision for Secondary education including improved access to, and possible expansion of, Manor High School.

It is envisaged that local centres will contain local shops as well as community space and flexible working space. The local centre and key community buildings are located at key intersection on the main public transport route though the site and along the green links, providing excellent access for pedestrians and cyclist in car free environments.

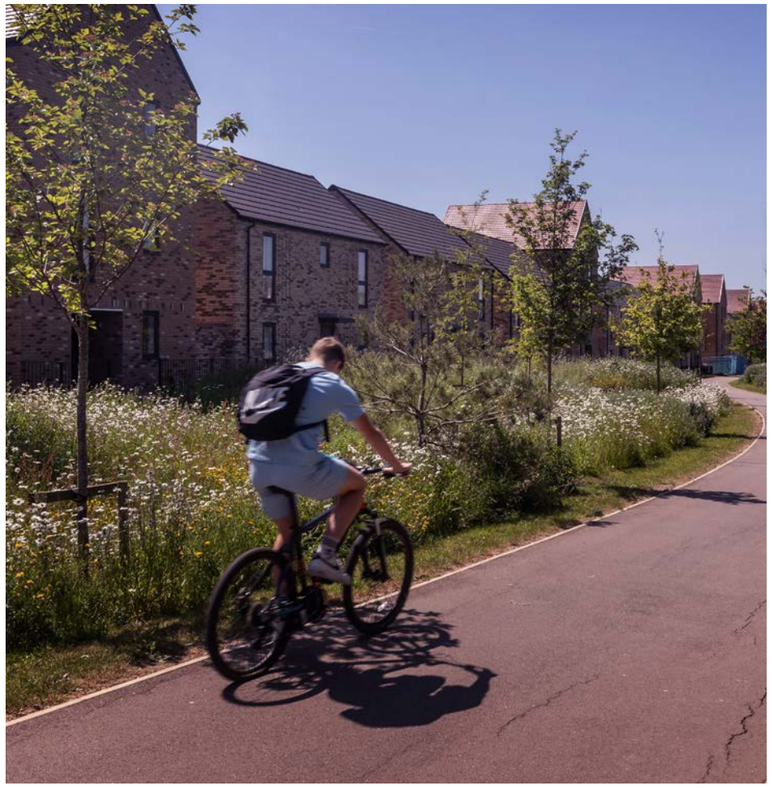




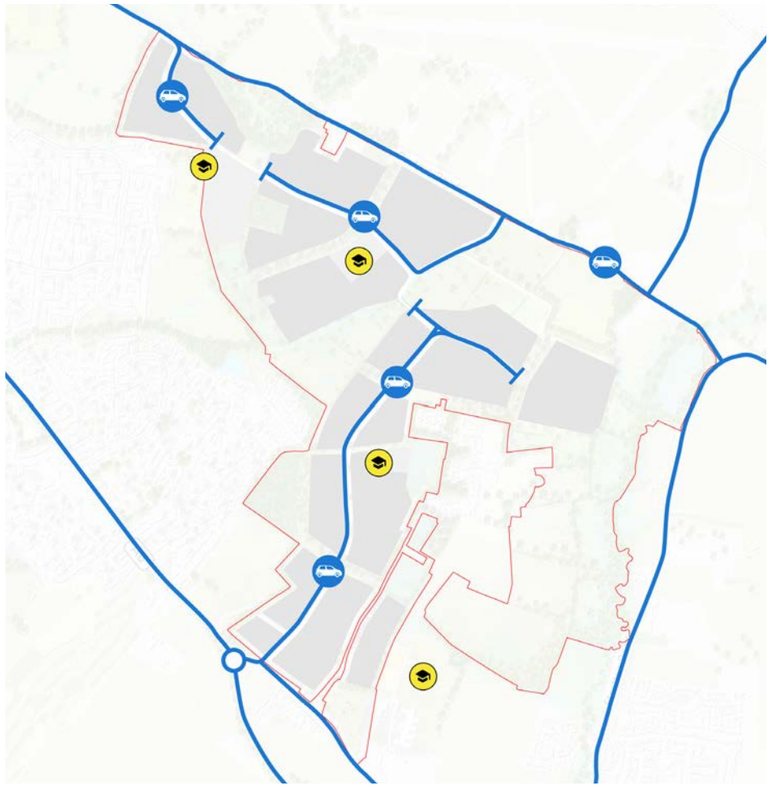
Sustainable transport principles

The sustainable transport strategy for the project is underpinned by the following principles:

- The guiding principles of the walkable neighbourhood – legible and attractive paths and streets that connect to on-site services and local community hubs.
- Embedding a Healthy Streets approach that targets the 10 indicators that improve the human experience of being on streets.
- Giving priority to pedestrian movements and ensuring that high quality, attractive, and direct cycle routes are provided that facilitate door-to-door access.
- A new bus route between Great Glen and Leicester passing through the site along the primary road via local centres and schools, with services every 15 minutes.
- Limiting vehicular access to neighbourhoods within the site area and restricting the possibility for through traffic from the A6 to Gartree Road.
- Provision of mobility hubs that facilitate transport interchange and feature bike/scooter hire, parcel drop and storage, electric vehicle/cycle charging, bike repair station, cycle parking and car club vehicles.
- Ensuring that adequate facilities are available for home deliveries and emerging technology (such as safeguarding for autonomous vehicles or ground/aerial drones) within the emerging masterplan.
- Consideration of an option for a potential Park & Ride near the A6 frontage, linked to a mobility hub, which seeks to reduce traffic flows on the A6 corridor.

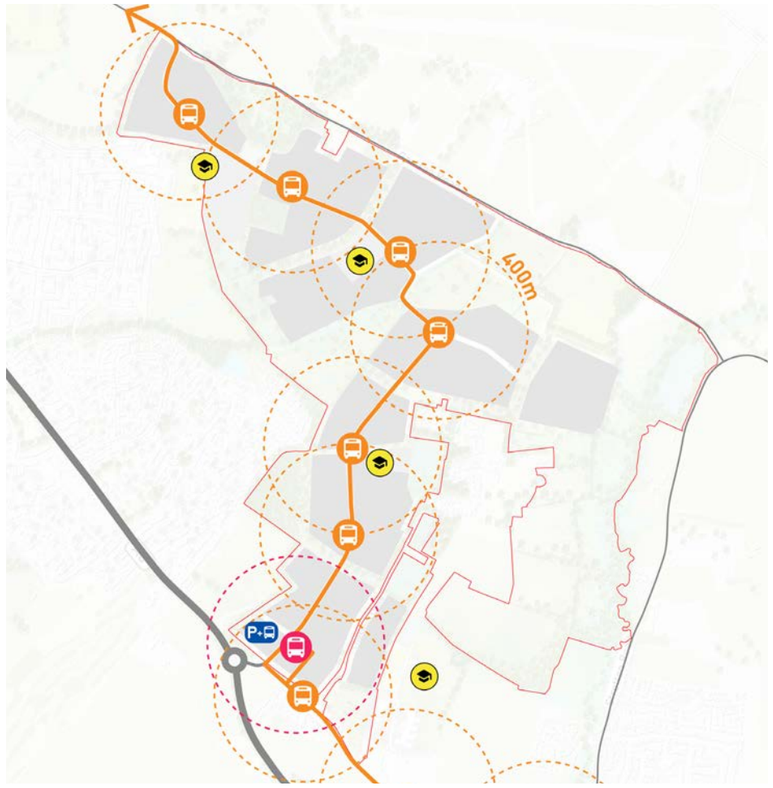


Connectivity



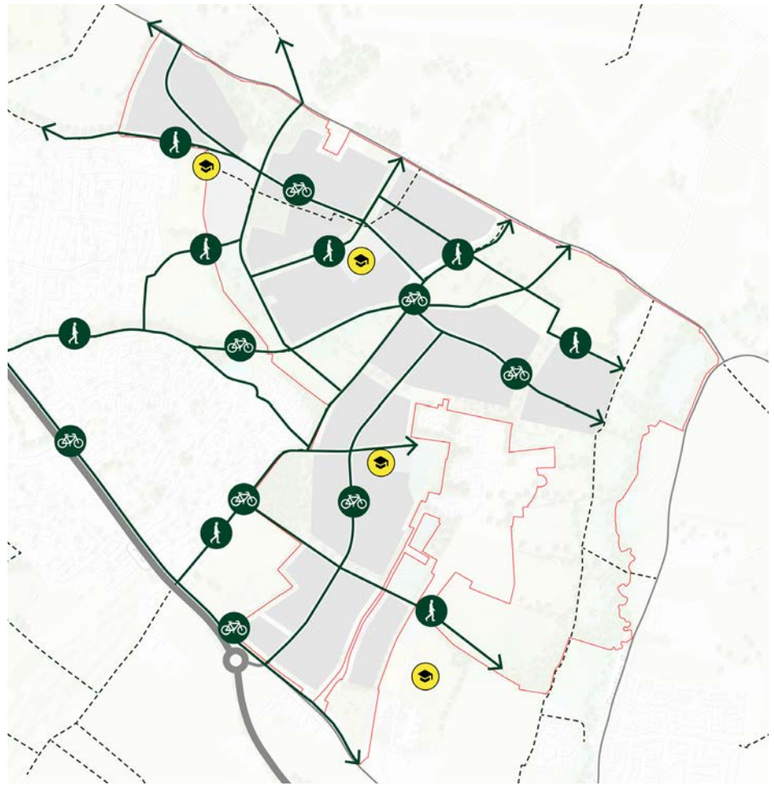
Private vehicles

There are three proposed access points into the site - one from the A6 via a new junction off the roundabout with London Road and two from Gartree Road. The primary road is configured to not allow through traffic, thereby limiting vehicular access to neighbourhoods within the site area and restricting the possibility for through traffic from the A6 to Gartree Road.



Buses

A new bus route between Great Glen and Leicester passing through the site along the primary road via local centres and schools, with services every 15 minutes. Proposals allow for high accessibility to new housing and adjacency of bus stops to proposed local centres and schools. Access to a mobility hub near the London Road frontage would provide an enhanced public transport service offering for the site and the existing area. There is also an option for a potential Park & Ride facility near the A6 junction to relieve traffic, if required.



Active travel

The site will be designed with a high-quality network of active travel routes to allow day-to-day journeys to school, work and amenities possible through walking and cycling. This will be easier than travelling by car, with many routes to be vehicle free. Existing public footpaths and bridleways form a key part of the network and will be enhanced to provide cycle and walking connections through the site and into Oadby and beyond. There is an opportunity to tie into a strengthened cycle route along the A6 corridor that can form part of the wider Leicester network.

4. Indicative land use budget

Indicative land budget

An indicative land budget has been developed to show how the site can accommodate 4,000 homes along with the required infrastructure, amenities and green space that is required to support this population. The proposals and this land budget will need to be further developed and refined during the next stages of the project.

	hectares	acres	% of total		O&W	Harborough
Application site area	**377**	**931.6**	**100%**		**65ha**	**312ha**

Exclusion area	hectares	acres	% of total	Area required	hectares	hectares
Education	**13.3**	**32.86**	**3.5%**		**9.1**	**4.2**
2FE primary school	2.00	4.9	0.5%			2.0
3FE primary school	3.00	7.4	0.8%		3.0	
Secondary school (expansion or new)	8.30	20.51	2.2%		6.1	2.2
Open space	**168.5**	**382**	**44.7%**	116.64	**30.7**	**137.8**
Parks and gardens	33.70	83.27	8.9%	4.80	14.9	18.8
incl. Amenity green space				8.64		
incl. Provision for children and young people				2.88		
Natural and semi-natural greenspace	98.60	243.65	26.2%	81.60	5.1	93.5
Allotments	6.40	15.81	1.7%	3.36		6.4
Outdoor sports	15.80	39.04	4.2%	15.36	7.1	8.7
Green corridors	14.00	34.59	3.7%		3.6	10.4
Buffer	27.00	66.72	7.2%		0.4	26.6
Existing farm	1.60	3.95	0.4%			1.6
Scheduled monument	12.30	30.39	3.3%			12.3
Infrastructure	12.80	31.63	3.4%		1.2	11.6
Total exclusion area	**235.5**	**581.9**	**62.5%**		**41.4**	**194.1**

Net developable area	hectares	acres	% of total			
Residential	140.0	346	37.1%		22.1	117.9
Local centre uses (7,500 sqm in total)	1.5	3.7	0.4%		1.5	
Total net developable area	**141.5**	**349.7**	**37.5%**		**23.6**	**117.9**

Blanket density	**35**	**dph**		
Dwellings	**4000** [1]		**Dwellings** [2]	**600-1,000**	**3,000-3,400**

[1] Assuming c80% of residential plot area to be developed for housing

[2] At this stage, the school and local centre locations are not fixed. A range is provided as they could be located in either O&W or Harborough

fletcher prıest archıtects
london + kōln + rıga

project ref: 2019

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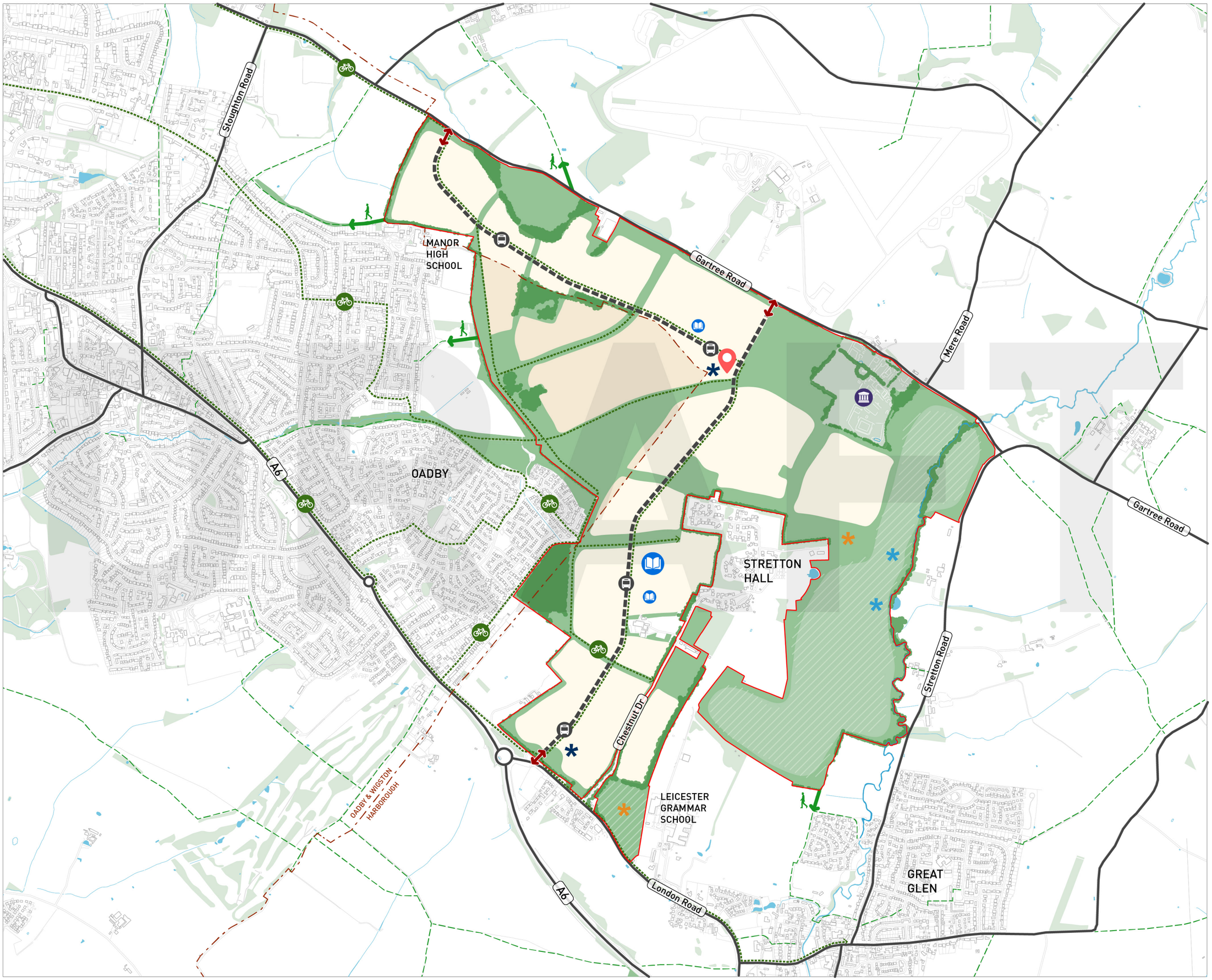
CES +
ISO 9001
ISO 14001
RIBA Chartered Practice
UKGBC

Appendix 3: Illustrative Masterplan Update (2025), incorporating uses identified in draft Allocation SA02;



- Site boundary
- District administrative boundary
- Development in HDC min. 3,150 homes
- Development in O&W min. 850 homes
- Green space
- Primary school
- Secondary school
- Local centre
- Indicative employment area
- Indicative cemetery sites
- Protected Scheduled Monument
- Access locations subject to detailed design
- Primary access road
- Mobility hubs with bus stops
- New and improved cycle links including new cycle lanes along Gartree Rd and improvements along the A6 into Leicester
- Pedestrian connections and enhanced public footpaths
- Potential informal floodwater storage area
- Area of separation to Great Glen

REV	DESCRIPTION	BY	CHK	DATE
P01	Drawing Created	BD	SH	020525

WORK IN PROGRESS

NORTH

URBAN & CIVIC / HOMES ENGLAND

Land South of Gartree Road Illustrative Plan

DRAWING NUMBER / REVISION
2019-FPA-ZZ-ZZ-DR-U-05002
FPA INTERNAL JOB NUMBER
2019
SCALE
1:7500 @A1 1:15000 @A3
REVISION
P01
DATE / DRAWN BY / CHECKED BY
02.05.2025 BD / SH

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Appendix 4: Education Requirements Technical Note

APPENDIX 5: LAND SOUTH OF GARTREE ROAD

HARBOROUGH DISTRICT COUNCIL
REGULATION 19 PRE-SUBMISSION CONSULTATION DRAFT PLAN
EDUCATION

1 Overview

1.1 The Land South of Gartree Road (LSGR) is being promoted by land owners - Urban&Civic (U&C) and Homes England (HE). With regards to education, U&C and HE recognise and agree:

- The need for the LSGR Strategic Development Area allocation to provide sufficient school places to meet the needs of LSGR families.
- The emerging masterplan will include on-site provision of nurseries and early years; primary and secondary provision (with sixth form).
- LSGR has some capacity to meet wider needs at secondary level – and that that would have significant benefit to the wider community and ability for the local authorities to support their housing growth needs.

2 Education Demand

2.1 Using LCC's yield rates as outlined in the Planning Obligations Policy (2019)[1] (pg 20), the proposed 4,000 homes (modelled as 'homes' not 'flats') result in demand for:

- 340 early years places;
- 1,200 primary places (equating to 5.7 forms of entry); and,
- 668 secondary places (not including sixth form) (equating to 4.5 forms of entry).

3 Policy

3.1 A summary of each local authority policy below on education is as follows:

- Harborough District Council Regulation 19 Pre-Submission Consultation Draft Plan (Policy SA02) –
  - sufficient land for 8-form of entry (FE) secondary school (including post-16) to **accommodate wider strategic growth needs**
  - 5 FE primary school provision (including early years provision)
- Oadby and Wigston Borough Council Regulation 19 Pre-Submission Consultation Draft Plan (Policy AP5)

[1] Leicestershire County Council (2019). Planning Obligations Policy [online] Available at: https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2019/8/16/Planning-Obligations-Policy.pdf

- 5FE secondary school (including post-16 provision) with further land for 3FE secondary school to **accommodate wider strategic growth needs**
- 7FE primary school provision (including early years provision)

4 Engagement

4.1 Following engagement with LCC (the authority with responsibility for education), HDC and OWBC we understand:

- There is agreement among LCC, HDC and OWBC to revise primary requirement to 6 FE
- 8FE secondary school serves a wider need. LCC yield rates estimates additional 1.5FE arising from wider strategic allocations – therefore need from housing growth is 6FE. A proportion of need is fulfilling a wider strategic need above development growth. Therefore, the provision of an 8 FE secondary school would be serving both development growth and a wider strategic need for Leicestershire

Appendix 5: Review of Viability Evidence (CBRE) (2025)

Draft Harborough Local Plan: Regulation 19 Consultation

Technical representation relating to the Harborough District Council Local Plan Viability – Main Viability Report

Prepared by CBRE UK Ltd on behalf of:

- Homes England and Urban&Civic

May 2025

Contents

Introduction

Procedural Matters

Instruction Purpose

1. CBRE UK Ltd ('CBRE') has been instructed jointly by Homes England and Urban&Civic, whom has interests in Harborough district, and is in the process of promoting these interests through the emerging Harborough District Council ('HDC') Local Plan review.

2. CBRE's instruction relates specifically to preparation of representations on the Harborough District Council Local Plan Viability – Main Viability Report (dated January 2025), hereafter referred to as the 'MVR', which has been prepared by consultants Aspinall Verdi ('AV') on behalf of HDC.

3. The MVR has been published as the evidence base for the emerging HDC Draft Local Plan Regulation 19 consultation ('the DLP consultation'), which runs from Monday 10th March up to and including Tuesday 6th May 2025.

4. The MVR was commissioned by HDC as the evidence base to test the impact of drafted policy positions on the financial viability of the residential land supply across the HDC area and to inform HDC's refinement of drafted policies within the DLP.

5. As Homes England's and Urban&Civic's interests ('Land South of Gartree Road and East of Oadby' or 'the Site') is a cross-boundary strategic site falling within both HDC and Oadby & Wigston Borough Council ('OWBC') administrations, AV has been instructed by HDC and OWBC to undertake a cross-boundary assessment reviewing the Site as a whole. The 'Oadby SDA Cross Boundary Assessment Report' can be found at Appendix 7 of the MVR.

Matters of Representation

Purpose

6. Homes England and Urban&Civic have extensive experience of the practicalities of planning and delivering large-scale strategic sites, and their assessment, based on current models is that the Site is viable but that the policy needs to be set as a range allowing for an agreed viability process.

7. This representation is prepared jointly on behalf of Homes England and Urban&Civic and provides detailed comments upon the published MVR, which CBRE understands will inform and underpin emerging housing policies relating to affordable housing targets and other planning obligations to be sought via the emerging Local Plan.

8. Comments are set out under a set of thematic headings to assist cross-reference with the published MVR material.

9. In summary, the representation identifies the following issues below:

Technical Issues	Comments
AV's recommendation of 40% affordable housing provision for strategic sites	Land South of Gartree Road and East of Oadby and Land between Scraptoft and Bushby are both unviable, assuming provision of 40% affordable housing, based on AV's own assessment. For the cross boundary strategic site (Land South of Gartree Road and East of Oadby), the OWBC WPVA recommends 20% affordable housing provision.
Appraisal Modelling	AV's appraisal for Land South of Gartree Road and East of Oadby is modelled on a traditional housebuilder development appraisal model despite AV referencing that the Site will be delivered on a serviced basis. CBRE recommend that a land trader / master developer model be prepared which forms a suitable modelling basis for such a large-scale, complex strategic site.
Cashflow	CBRE request that AV provide full transparency on the appraisal inputs and cashflow profiling of the development programme and generation of revenue, infrastructure and servicing costs, and returns.
Residential Value Assumptions	AV's residential value assumptions are based on outdated evidence, which may not accurately reflect current market conditions. AV's value assumptions for flats are based on limited second-hand data, and their new build asking price data is skewed towards high-value areas and larger properties, whilst positioning values above their own evidence base. Therefore, raising concern about the reliability and representativeness of the evidence base. For the cross boundary strategic site (Land South of Gartree Road and East of Oadby), the OWBC WPVA adopts lower residential values than AV.
Affordable Housing Transfer Values	The affordable housing 'blanket' transfer values adopted are unrealistically high and therefore misleading.
Commercial Land Value Assumptions	The land value adopted by AV is unrealistically high and close to prime industrial levels and is therefore inappropriate for Land South of Gartree Road and East of Oadby.
Baseline Construction Costs	CBRE recommends that AV adjust the threshold for larger sites from 50 to 100 units for consistency and reliability, update BCIS construction cost estimates to present day (adopting Median rates), as the existing data is outdated.
External works	AV's 10% allowance for externals is inconsistent with their recent Local Plan and CIL viability assessments, which adopt 15-20% for greenfield and strategic sites. CBRE would expect an allowance of 15-20% where LQ BCIS construction costs are assumed. For the cross boundary strategic site (Land South of Gartree Road and East of Oadby), the OWBC WPVA adopts a 15% allowance.
BNG	CBRE strongly advocates that the adopted rates are indexed to the present day using BCIS All-in TPI to more accurately reflect the current cost of meeting BNG requirements.
Housing Mix & Space Standards	The source of the extra-over costs for optional Building Regulation requirements remains unclear. Clarification is required from AV on their assumed rates.
Part L & FHS	AV's £6,000 per unit allowance for Part L and Future Homes Standard (FHS) costs is insufficient, CBRE recommend an updated allowance of at least £12,500 per unit to accurately reflect the additional costs required for compliance with current and future building regulations (as supplement to RICS BCIS derived base construction costs).

EV Charging	AV incorrectly assume that the additional cost for EV charging is included within BCIS costs. RICS BCIS construction cost estimates are not yet inclusive of EV charging (Part S) as a standardised cost and this has been confirmed directly by BCIS. CBRE recommends an allowance of £1,000 per housing unit and £2,500 per 4 flats to align with AV's other Local Plan viability assessments.
Building Safety Levy ('BSL')	AV fails to reflect the introduction of BSL within their assessment. It is recommended that the published costs associated with BSL should be incorporated with the viability assessment and/or sensitivity tested as a minimum.
Contingency	AV's contingency allowance is inconsistent with their recent Local Plan & CIL viability assessments. It is recommended that a 5% contingency on all development costs is logical application and consistent with the OWBC WPVA of Land South of Gartree Road and East of Oadby.
Professional Fees	CBRE recommends that AV adopt a consistent professional fees allowance of 8% for the Land South of Gartree Road and East of Oadby, in line with HDH's approach in the OWBC WPVA, and include promotion costs.
Sales & Marketing Fees	CBRE would typically expect an allowance of 2.5-3% for sales and marketing fees. CBRE recommends that AV aligns their assumption with the allowance they made within their other published Local Plan viability assessments at 3.0%.
Affordable Housing Disposal Costs	AV has applied total sum of £10,000 for affordable housing transfer legal costs in relation to Land South of Gartree Road and East of Oadby which is entirely insufficient given the quantity of affordable units tested. It is also unclear to which affordable units this applies, and clarification is requested from AV.
Section 106 and Infrastructure Costs	CBRE requests substantiation of the S106 and infrastructure costs adopted by AV, noting inconsistency with the OWBC WPVA and the need for comprehensive evidence to ensure accurate viability assessments for plan-making purposes.
Developer Return	AV's proposed developer's return of 17.5% on GDV for open market housing is inconsistent with their recent Local Plan, CIL and site-specific viability assessments and with OWBC WPVA. CBRE recommends a return of at least 20% to accurately reflect development risks and ensure consistency. CBRE also note that AV's appraisal for Land South of Gartree Road and East of Oadby is modelled on a traditional housebuilder development appraisal which is inappropriate basis for large-scale strategic sites. AV's appraisal therefore does not allow for an entity to deliver infrastructure and ignores servicing costs and the necessary return on these costs.
Finance Rate	There is confusion over the finance rate AV intend to adopt in respect of Land South of Gartree Road and East of Oadby. AV should revisit their appraisal and apply a finance rate of 8.0% (as an absolute minimum) within their assessment for consistency with their advice elsewhere in the County.
BLV	AV unjustifiably applies a lower BLV to the Land South of Gartree Road and East of Oadby by comparison to the OWBC WPVA appraisal. AV's calculation of BLV also appears to be incorrect and requires addressing.
Lack of Consistency	The inconsistency between AV's Cross Boundary Assessment and OWBC WPVA appraisal for the Land South of Gartree Road and East of Oadby is concerning. The respective councils should address this issue and agree on a unified approach to ensure credibility, and deliverability of the strategic site.

Viability in Plan-making: Interpretation of Results

10. Para. 34 of the National Planning Policy Framework ('NPPF') confirms that Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure. Importantly, such policies should not undermine the deliverability of the Plan.

11. Para. 31 of the NPPF requires that the preparation and review of all Plan policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.

12. Paragraph 35 of the NPPF confirms that in order for a Plan to be found 'sound', it must pass the relevant four tests. Intrinsic to these are the requirements for Plans to be demonstrably justified – based on proportionate evidence – and effective. Critically, to be effective a Plan must be deliverable over the plan period.

13. Paragraph 58 of the NPPF subsequently confirms that all viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance.

14. The Government's National Planning Practice Guidance for Viability ('PPGV') confirms the following:

    a. Para. 002 states that viability assessment should be utilised to ensure that **policies are realistic** and the total cumulative cost of all relevant policies will not undermine deliverability of the plan.

    b. Para. 002 also confirms that policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and **allows for the planned types of sites and development to be deliverable**, without the need for further viability assessment at the decision making stage.

15. This is reiterated in the Government's published PPG for Plan Making at para. 39.

16. In summary, the NPPF and PPG require that both infrastructure provision and affordable housing needs must be taken account of when setting policy requirements in Plans, notably for affordable housing. As such, the Council should not be setting a fixed target that is not justified by the evidence, and therefore set up a conflictual compliance based viability approach, but instead take a partnership approach with the Developer, Council and Infrastructure providers to optimise the balance of infrastructure and affordable housing for each phase, whilst aiming to maximise housing delivery meeting the range of local needs.

Results & Policy Interpretation: Affordable Housing in Strategic Scale Sites

17. The DLP (Policy HN01 Housing Need: Affordable Homes) sets out the recommended maximum affordable housing targets for HDC to adopt for traditional residential sales site typologies as follows: *"To meet the need for affordable housing 40% of the total number of homes in residential developments of 10 or more homes (or capable of delivering 10 or more homes) must be affordable."*

18. The MVR identifies and tests the viability of three strategic sites:

    a. Land South of Gartree Road & East Oadby (4,000 units);

    b. Land between Scraptoft and Bushby (950 units);

    c. Market Harborough Cluster (1,700 units).

19. The findings of AV's assessment can be found on pg. 99 within the MVR and CBRE has summarised the conclusions of AV's testing in the subsequent paragraphs.

20. AV's Cross Boundary Assessment indicates that **Land South of Gartree Road and East of Oadby is 'marginally viable'** at 40% affordable housing provision including Section 106 (c. £20,000 per unit) and infrastructure costs (c. £31,000 per unit). According to AV, this conclusion is on the basis of a placemaking premium applied to strategic sites and a lack of information provided in respect of land values. Despite this, AV consider that 40% affordable housing provision is 'reasonable'.

21. However, AV's opinion that the proposal is 'marginally viable' is an overstatement as the residual land value ('RLV') within AV's appraisal falls short of their assessed Benchmark Land Value ('BLV') (i.e., £57,959,000 vs. £63,540,000). In this case, Land South of Gartree Road and East of Oadby is in fact unviable, assuming provision of 40% affordable housing, based on AV's own assessment.

22. The MVR indicates that **Land between Scraptoft and Bushby is 'marginally viable'** at 40% affordable housing provision. Similarly to Land South of Gartree Road and East Oadby, the residual land value generated is below the Benchmark Land Value. Hence, presenting the same issue.

23. Finally, in respect of **Market Harborough Cluster, AV conclude this is viable** at 40% affordable housing provision.

24. Furthermore, given Homes England's and Urban&Civic's interests ('Land South of Gartree Road and East of Oadby' or 'the Site') is a cross-boundary strategic site falling within both HDC and OWBC administrations, Homes England and Urban&Civic have provided representations on the recent OWBC Local Plan Regulation 19 consultation.

25. It is noted that Table 10.9a (of the OWBC Whole Plan Viability Assessment 2024) showing maximum developer contributions for sites in Oadby indicates that site AP5 has lower maximum developer contributions than the neighbouring site AP6. AP6 is also proposed as a draft allocation but with lower infrastructure requirements, including no on-site schools, and with 20% affordable housing.

26. On the basis of this evidence the 40% affordable housing (in addition to the full range of other requirements) is not justified. Homes England and Urban&Civic therefore propose flexibility in the policy to have the 40% as an 'up to' target and subject to viability considerations.

Developer Contributions: Viability Review Mechanism

27. Policy HN01 (e) (Housing Need: Affordable Homes) includes a provision for a viability review mechanism.

28. The policy states that where a viability case has been made to HDC at the planning application stage for schemes of 500 or more houses, *"viability will be reassessed at agreed times over the lifetime of a development based on actual costs and values generated by the development."*

29. CBRE observes a lack of detail as to the methodology and implementation of the mechanism, and as such generates significant uncertainty for developers and landowners.

30. This policy wording proposes a generic district wide approach, however, there should be specific reference to the viability review mechanism and a bespoke approach in Policy SA02 (Land South of Gartree Road Strategic Development Area) given the viability evidence and conclusions set out herein these representations.

31. CBRE recommends further detail on the workings of the mechanism are made available for stakeholder consideration and comment via further consultation.

Technical Deficiencies

32. Having conducted a detailed review of the published MVR, CBRE has identified a series of technical deficiencies in the adopted methodology and inputs.

33. In addition, several requests for clarification from AV are set out, where evidenced justification is not provided.

34. These points are raised under the following thematic sub-sections.

Appraisal & Cashflow

Appraisal Methodology

35. As discussed previously, AV's Cross Boundary Assessment viability is modelled on a basic traditional housebuilder residual appraisal model despite AV referencing that the Site will be delivered on a serviced basis. Whilst a traditional housebuilder residual appraisal is appropriate for small site typologies, it is not the appropriate basis for assessing large-scale strategic sites such as Land South of Gartree Road and East of Oadby as it is not reflective of the delivery strategy.

36. Alternatively, a land trader / master developer ('LTMD') model is a more accurate methodology allowing the ability to reflect the delivery strategy of a master developer undertaking the infrastructure / servicing works, taking a development management fee (return on costs) and disposing of serviced land parcels to housebuilders. A project return will be sought by the land trader / master developer entity based on an IRR. It is therefore suitable modelling basis for a strategic site such as Land South of Gartree Road and East of Oadby given scale, complexity and phasing. At present, AV's appraisal methodology does not allow for an entity to deliver infrastructure and ignores servicing costs and the necessary return on these costs.

Cashflow

37. The viability appraisal outputs for the Cross Boundary Assessment do not provide transparency on the full appraisal inputs and cashflow profiling of the development programme and generation of revenue, infrastructure and servicing costs, and returns. The timing of these factors can have a significant bearing on financial viability, as costs incurred will be met by development finance, which will mean a roll-up of interest. It is not possible for stakeholders to discern whether the programme (cashflow profiling of costs and revenues) applied to the Cross Boundary Assessment is practically deliverable and credible. CBRE request that the full appraisals and cashflows are published transparently by HDC and AV for the draft strategic allocations.

Residential Value Assumptions

Evidence Base

38. AV's Residential Market Paper (Appendix 2 of the MVR), dated April 2024, outlines the background to the value assumptions proposed for use in the MVR. It refers to the following information:

- National and Regional Market Overviews
- Existing Evidence Base on Residential Sales Values
- Aspinall Verdi Research
    - New Build Achieved Values
    - New Build Asking Prices
    - Second-Hand Achieved Values
    - Site-Specific Viability Assessments

39. CBRE observes the following:

a) The Residential Market Paper has not been updated since the previous published Harborough Whole Plan Viability Testing prepared by AV in 2024 and is therefore now circa 12 months out of date. AV is consequently relying on evidence which is substantially older (transactions over the 18 months to April 2024 i.e., from 2022).

Since then, the UK property market has experienced a prolonged and highly challenging period driven by substantial economic and geo-political uncertainty nationally and globally. This has led to a high inflationary environment against a backdrop of tightening monetary policy and a UK-wide cost of living crisis. This caused interest rates to rise, availability of mortgage products to be tightened, a slowing of the residential market and a softening of residential values. Residential transactions recorded during 2022 may demonstrate inflated reservation/sales rates and pricing levels by comparison to 2023-25.

Consequently, the technical issues raised by CBRE in previous representations submitted to HDC on behalf of Homes England, dated September 2024, are therefore still relevant and remain unaddressed by AV.

b) The Residential Market Paper does not report a single new build achieved value for 1-bed or 2-bed flats across any of the identified areas. Therefore, AV's achieved value data for flats relies on second hand achieved values in the Leicester Fringe and Market Harborough areas (noting that there are no reported second hand achieved values for flats in the Lutterworth area). In addition, AV's new build asking price data includes no data for flats. Therefore, AV's value assumptions for 1-bed and 2-bed flats are based wholly on second-hand achieved values in the Leicester Fringe and Market Harborough areas. CBRE considers this to be a limited evidence base. On this basis, there should be a high degree of caution and conservatism applied in the flatted unit values adopted in the MVR, given it appears that the local market is unlikely to support open-market flatted development.

c) Whilst there is evidence of new build achieved values provided for houses across AV's defined market value areas, the sample of each is not clear. AV report that the dataset is made up of around 230 transactions over the 18 months to April 2024, but do not specify the quantity of sales per unit type in each area. As this evidence is not published for stakeholder review, it is uncertain how reliable the reported average new build achieved values are, given there is a perceived risk that the samples are skewed to limited locations.

d) AV's evidence base relating to new build asking prices relies heavily on data from new build developments in Market Harborough (4 of the 7 sites referenced), which AV identifies as a 'high value area' within its proposed defined market value areas for the MVR. The three remaining developments identified are located in Lutterworth and in the rural settlement area, with no evidence provided from the Leicester Fringe area. From a locational perspective, this presents a risk of skewing all adopted values towards the upper end. CBRE notes that there is a reasonable level of new build data available on the fringe of Leicester (noting that this sits on the Harborough / Oadby & Wigston / Charnwood boundary), which would be relevant to inform current market new build asking prices for the Leicester Fringe area and the 'medium value area' accordingly (with modest location adjustment). For example:

i. Bellway – Stoughton Park, Oadby, Leicestershire - https://www.bellway.co.uk/new-homes/east-midlands/stoughton-park AV has researched Stoughton Park for the purpose of the Oadby SDA Cross Boundary Assessment Report but fails to recognise it for the MVR.

ii. David Wilson Homes – Thorpebury in the Limes, Leicestershire https://www.dwh.co.uk/new-homes/dev-001123-thorpebury-in-the-limes/?utm_source=google&utm_medium=local

iii. David Wilson Homes – Wigston Meadows, Leicestershire https://www.dwh.co.uk/new-homes/dev002780-wigston-meadows-north/?location=Newton%20Harcourt

e) Furthermore, within each development cited by AV, the asking price data predominantly reflects larger semi-detached and detached properties. AV report evidence of just two available terraced properties at one development. This suggests a limited sample for smaller properties, which again should lead AV to exercise caution in the sales values to be adopted for the MVR.

40. AV's Oadby SDA Cross Boundary Assessment Report (Appendix 7 of the MVR), dated January 2024, also outlines the background to the value assumptions proposed for use in the Cross Boundary Assessment of Land South of Gartree Road and East of Oadby.

41. CBRE observes the following:

f) The Cross Boundary Assessment was prepared by AV in January 2024 and is therefore now circa 15 months out of date at the time of writing. AV is consequently relying on outdated evidence in order to inform their pricing assumptions.

g) AV report new-build values are based on 63 transactions identified within a 5-mile radius of the Site (excluding central Leicester) dated from September 2023. AV note the limitations of sourcing data from the Land Registry stating it *"does not disclose the unit type, size or specification"*. The corresponding dataset is provided at Appendix 1 and depicts sales data from Bellway – Stoughton Park, Bloor Homes – Cottage Farm and Bloor Homes – Bushby Fields. This sales data predominantly reflects detached properties which account for over 73% of the comparable data identified across the 3 schemes. Whilst AV report evidence of just two terraced properties and only 15 semi-detached properties. This suggests a limited sample for smaller properties, which again should lead AV to exercise caution in the sales values to be adopted for the Cross Boundary Assessment.

h) Similarly to the Residential Market Paper, the Oadby SDA Cross Boundary Assessment Report does not report a single new build achieved value for 1-bed or 2-bed flats across any of the identified areas. Therefore, AV's achieved value data for flats relies on second hand achieved values in the Leicester Fringe and Market Harborough areas (noting that there are no reported second hand achieved values for flats in the Lutterworth area) as set out in the Residential Market Paper. In addition, AV's new build asking price data includes no data for flats. Therefore, AV's value assumptions for flats are based wholly on second-hand achieved values in the Leicester Fringe and Market Harborough areas. CBRE considers this to be a limited evidence base. On this basis, there should be a high degree of caution and conservatism applied in the flatted unit values adopted in the Cross Boundary Assessment, given it appears that the local market is unlikely to support open-market flatted development.

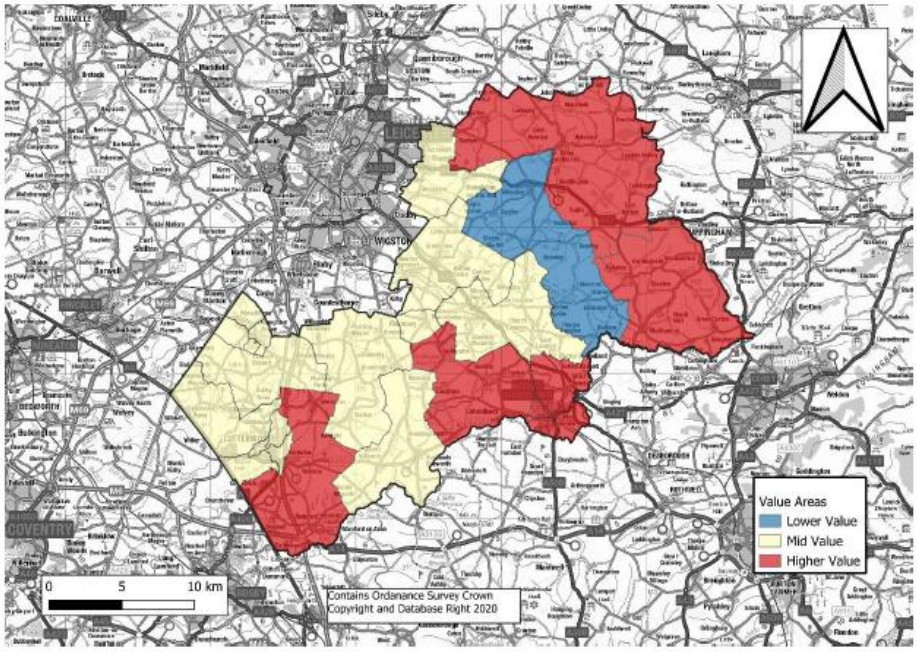
42. CBRE considers that the evidence base relating to new build sales transactions to be limited with the majority of transactions representing larger detached properties. New build asking prices data is also weak due to a limited sample size identified therefore providing unreliability of locational pricing.

43. As a result, CBRE questions the reliability of the residential value assumptions subsequently adopted for MVR and more specifically, the Cross Boundary Assessment.

Adopted Value Assumptions – Plan Wide

44. AV's Residential Market Paper outlines the background to the unit (and £/m^2) value assumptions proposed for the MVR. AV propose division of the district into three market 'value zones' (by electoral ward) on page 20 of the Residential Market Paper. This is replicated below.

Figure 5.3 - Harborough Value Zones Map



Source: Land Registry/ EPC Tool - AspinallVerdi, 2024

Table 5.3 - Ward by Value Zone

Lower Value Zone Wards	Billesdon.
Mid Value Zone Wards	Thurnby and Houghton, Glen, Kibworth, Orchard, Brookfield, Swift, Dunton, Sutton, Broughton, Astley, Peatling, Bosworth, Springs, Ullesthorpe, Primethorpe, Fleckney.
Higher Value Zone Wards	Tilton, Nevill, Great Bowden, Arden, Lubenham, Little Bowden, Welland, Logan, Misterton.

Source: AspinallVerdi, 2024.

45. Tables 7.1 and 7.2 of the Residential Market Paper outline AVs proposed residential value input for the MVR for each of their defined market value zones. This is replicated overleaf.

Table 7.2 - Market Value Assumptions (£) (February 2024)

Property type	Floor area sqm	Higher Value Zone	Mid Value Zone	Lower Value Zone
1 Bed Flat	50	£210,000	£190,000	£160,000
2 Bed Flat	61	£260,000	£230,000	£190,000
2 Bed House	70	£290,000	£245,000	£215,000
3 Bed House	93	£385,000	£330,000	£285,000
4 bed House	120	£500,000	£415,000	£375,000
5 Bed House	163	£665,000	£575,000	£515,000

Source: AspinallVerdi, February 2024.

Table 7.1 - Market Values Assumptions (£ psm) (February 2024)

Property type	Floor area sqm	Higher Value Zone	Mid Value Zone	Lower Value Zone
1 Bed Flat	50	£4,200	£3,800	£3,200
2 Bed Flat	61	£4,262	£3,770	£3,115
2 Bed House	70	£4,143	£3,500	£3,071
3 Bed House	93	£4,140	£3,548	£3,065
4 bed House	120	£4,167	£3,458	£3,125
5 Bed+ House	163	£4,080	£3,528	£3,160

Source: AspinallVerdi, February 2024.

46. CBRE note that whilst the Residential Market Paper is dated April 2024, AV's market value assumptions have actually been updated by comparison to those contained within the Residential Market Paper (of the same date) prepared by AV which was published as part of the initial stakeholder consultation event in July 2024.

47. AV's adopted market value assumptions from the original Residential Market Paper are extracted below for comparison purposes.

Table 7.2 - Market Value Assumptions (£) (February 2024)

Property type	Floor area sqm	Higher Value Zone	Mid Value Zone	Lower Value Zone
1 Bed Flat	50	£195,000	£175,000	£125,000
2 Bed Flat	61	£270,000	£230,000	£180,000
1 Bed House	58	£230,000	£190,000	£130,000
2 Bed House	70	£290,000	£245,000	£180,000
3 Bed House	93	£385,000	£330,000	£255,000
4 bed House	120	£500,000	£415,000	£335,000
5 Bed House	163	£665,000	£575,000	£515,000

Source: AspinallVerdi, February 2024.

Table 7.1 - Market Values Assumptions (£ psm) (February 2024)

Property type	Floor area sqm	Higher Value Zone	Mid Value Zone	Lower Value Zone
1 Bed Flat	50	£4,130	£3,430	£2,560
2 Bed Flat	61	£4,440	£3,300	£2,500
1 Bed House	58	£4,340	£3,430	£2,290
2 Bed House	70	£4,220	£3,500	£2,560
3 Bed House	93	£4,110	£3,490	£2,760
4 bed House	120	£4,200	£3,480	£2,770
5 Bed+ House	163	£4,010	£3,440	£2,770

Source: AspinallVerdi, February 2024.

48. Firstly, CBRE has identified that there is no correlation between AV's proposed residential values presented in Tables 7.1 and 7.2.

49. In CBRE's previous representations prepared on behalf of Homes England, CBRE prepared a table comparing AV's reported values/m^2 presented in Table 7.1 and values calculated by CBRE based on those AV values presented in Table 7.2. A copy of CBRE's previous representations can be found at **Enclosure 1**.

50. From CBRE's analysis, it appears, the values/m^2 presented by AV in Table 7.1 reflect a different set of figures, with no observable relation to the absolute dwelling capital value assumptions outlined in Table 7.2 for Whole Plan Viability Testing. The discrepancy is of such a scale that it cannot possibly be due to a rounding issue, rather something more fundamental.

51. This created uncertainty are to which set of residential market values that AV proposed to utilise in the Whole Plan Viability Testing; and how these values were actually arrived at, in translating from the evidence in the Residential Market Report.

52. CBRE's previous representations recommended that these values were revisited, clarified and corrected by AV. The likely result of this review has led AV to produce a new set of residential pricing assumptions (see para. 29 above).

53. As AV has failed to update the Residential Market Paper to present day, consequently, the technical issues raised by CBRE in previous representations on behalf of Homes England, dated September 2024, are therefore still relevant and remain unaddressed by AV.

54. CBRE observes the following:

    a) On p.33 of the Residential Market Paper, AV state *"we note that these value assumptions appear to be in line with the asking prices in the current market, as established in section 6 of this report."* It is CBRE's experience that there is a typical discount from asking prices to achieved residential sales (net) prices of 3-5% in the current market, which reflects the incentives and discounts offered by housebuilders (and also negotiation in the re-sale market) due to ongoing challenging trading conditions, and therefore, CBRE consider that this is not a reliable basis upon which to accurately estimate residential values. AV has failed to demonstrate a discount of 3-5% from asking prices to reflect actual achieved transaction prices.

    b) CBRE note that AV has significantly increased the proposed values for flats across all value zones, for example, AV are concluding that 1-bed flats in the 'Lower Value Zone' have increased by 28%. However, this conclusion is based on the same market evidence as disclosed in the Residential Market Paper, which was utilised for AV's original pricing assumptions. This is illogical given no new build evidence was demonstrable within this market value zone. As a cross-check CBRE has considered House Price Index for the period April 2024 to present day, which demonstrates that flats in the Harborough local authority area have increased by only 1.6% over this period. Additionally, the average value of a flat in Harborough currently stands at £163,179.

    c) Furthermore, AV's proposed values for 2-bed flats appear high in comparison to AV's published evidence. As noted previously, the market data relied upon by AV is limited. The evidence reported in the Residential Market Paper suggests an average value of a 1-bed flat of £153,522 in Market Harborough, which is considered a high-value area. Therefore, AV's adopted value of £210,000 for a 1-bed flat in the higher value zone reflects a 37% premium on the achieved second-hand values, which is likely to be unachievable. Clarification from AV is sought to justify this level of premium. Otherwise, given deliverability is key to the NPPF test of soundness, it is recommended that a more cautious approach is taken to flatted unit values in the MVR.

    d) CBRE note that AV's proposed values for 2-bed houses in the higher value zone appears high in comparison to AV's published evidence. AV's reported average new build achieved values for 2-bed houses range from £222,451 to £256,617, whilst the second hand achieved values range from £241,598 to £262,559. Their evidence for asking price data includes two 2-bed terraced houses in Market Harborough from £284,995 - £289,995 and one 2-bed semi at £260,000. Therefore, it appears AV have based their higher value zone 2-bed house value of £290,000 on a very limited sample of asking prices on only two properties. Given the premium of asking prices over achieved prices, and the very small evidence base, CBRE considers this to be an unreliable sample which potentially leads to an overestimation of achievable residential values.

    e) CBRE note that AV's proposed values for 4-bed houses in the higher value zones also appear high in comparison to AV's published evidence. AV's reported average new build achieved values for 4-bed houses range from £368,986 to £441,617, whilst the second hand achieved values range from £390,141 to

£425,488. Their evidence for asking price data includes a total of 52 units which range from £314,995 to £659,995. However, CBRE notes that at most developments assessed by AV, asking prices for 4-bed houses were sub-£500,000. Based on this evidence, it appears that AV have based their higher-value zone 4-bed house value of £500,000 on a small selection of asking price data with a limited sample of developments and at the upper end of the demonstrable range. As above, given the premium of asking prices over achieved prices, and the limited evidence base, CBRE considers this to be an unreliable sample which potentially leads to an overestimation of achievable residential values.

f) It is noted that AV has increased the proposed values for all unit types in the lower value zones from 5.6% to 28%. As previously mentioned, this conclusion is based on the same market evidence as disclosed in the Residential Market Paper, which was utilised for AV's original pricing assumptions. As a cross-check CBRE has considered the Land Registry House Price Index ('HPI') for the period April 2024 to present day, which demonstrates that properties in the Harborough local authority area have increased on average by only 6.5% over this period. It is therefore illogical to implement such significant increases in proposed residential values.

Adopted Value Assumptions – Cross Boundary Assessment

55. Table 3.3 of the Oadby SDA Cross Boundary Assessment Report, summarises AV's adopted value assumptions in respect of Land South of Gartree Road and East of Oadby (the 'Site'). This is extracted below for reference.

Table 3.3 - AspinallVerdi Cross Boundary Assessment Adopted Values

Property type	Floor area sqm	Absolute Value	Value (£ psf)	Value (£ psm)
1 Bed Flat	50	£190,000	£353	£3,800
2 Bed Flat	61	£230,000	£350	£3,770
2 Bed House	70	£280,000	£371	£4,000
3 Bed House	93	£360,000	£360	£3,871
4 bed House	120	£450,000	£348	£3,750
5 Bed House	163	£563,000	£321	£3,455

Source: 241104 Harborough Newbuild Data.

56. CBRE makes the following observations:

a) Whilst the Site is located cross-boundary with OWBC, it is notably located within Harborough's residential 'mid value zone' according to AV.

However, AV has seemingly deviated away from the 'mid value zone' pricing assumptions adopted on a plan-wide basis and has instead opted for significantly higher proposed unit pricing. AV has failed to address the departure from adopting the 'mid value zone' pricing for the Cross Boundary Assessment.

CBRE has extracted this data for ease of comparison below.

Unit Type	MVR Mid Value Zone (£/unit)	Cross Boundary Assessment (£/unit)	% Difference
1-bed flat	£190,000	£190,000	0.0%
2-bed flat	£230,000	£230,000	0.0%
2-bed house	£245,000	£280,000	14.3%
3-bed house	£330,000	£360,000	9.1%
4-bed house	£415,000	£450,000	8.4%
5-bed house	£575,000	£563,000	-2.1%

b) CBRE note that AV's proposed values for 3-bed houses in the appears high in comparison to AV's published evidence. Cottage Farm evidenced by AV provides the largest sample of 3-bed house comparables (12) and achieved prices range from £292,155 to £368,950 (or average of £355/ft²). Whilst AV's pricing sits within this range, it proposes a higher price on a £/ft² basis in excess of the comparable evidence range. Similarly, AV's data on asking prices for 3-bed houses at Stoughton Park indicates that AV has set the 3-bed pricing above the asking levels on a £/ft² basis. This poses a risk given both achieved and asking prices across schemes with a larger sample sets do not support AV's proposed values and could potentially lead to an overestimation of achievable residential values.

c) The issue with AV's residential proposed values for flats also remains in the case of the Cross Boundary Assessment. AV's proposed values for 2-bed flats appear high in comparison to AV's published evidence. As noted previously, the market data relied upon by AV is limited. The evidence reported in the Residential Market Paper suggests an average value of a 1-bed flat of £153,522 in Market Harborough, which is considered a high-value area. Therefore, AV's adopted value of £190,000 for a 1-bed flat in the mid value zone reflects a 24% premium on the achieved second-hand values in a higher Value zone, which is likely to be unachievable. Clarification from AV is sought to justify this level of premium. Otherwise, given deliverability is key to the NPPF test of soundness, it is recommended that a more cautious approach is taken to flatted unit values in the MVR.

d) Given Homes England and Urban&Civic's interest (Land South of Gartree Road and East of Oadby) is a cross-boundary strategic site falling within both HDC and OWBC administrations, CBRE has also considered the evidence base published by OWBC for the Local Plan Regulation 19 consultation, namely the Whole Plan Viability Assessment ('WPVA') prepared by HDH Planning & Development ('HDH') (November 2024).

   HDH's site-specific appraisal (Site 27) contained within Appendix 12 of the WPVA utilises a blended value of £334/ft² for houses. NB: flats to not feature in the unit mix for Site 27, however, HDH has adopted a value of £325/ft² for flats on a plan-wide basis.

   Whereas AV confirms on pg. 5 of the Cross Boundary Assessment that blended values of £350/ft² for housing and £352/ft² for flats have been adopted within their appraisal for the Site.

   It is expected that both the AV and HDH evidence bases adopt consistent residential values for the same Site and it is entirely illogical to apply different pricing assumptions. HDH's conclusion of developer's return demonstrates greater consistency with the evidence demonstrated.

   As a sense check, adopting HDH's house pricing of £334/ft² across the proposed total open market housing mix consequently reduces AV's GDV from £743m down to £697m. Due to the scale of the Site, any adjustment in GDV has a significant detrimental impact on the viability of the Site and therefore

setting appropriate residential values based on relevant evidence is crucial to ensuring scheme viability and deliverability.

Affordable Housing Transfer Values

57. Pg. 29 of the MVR states the emerging affordable housing policy target of "*40% of the total number of homes in residential developments of 10 or more homes (or capable of delivering 10 or more homes) must be affordable.*" It also outlines the following tenure split:

- 75% affordable or social rent; and
- 25% affordable home ownership

58. Table 9.1 of the Residential Market Paper outlines AV's proposed affordable housing transfer values:

Table 9.1 - Affordable Housing Transfer Values Assumptions (March 2024)

Tenure	Transfer Value (% of MV)	Comments
Social Rent	50%	
Affordable rent	55%	
Low-Cost Home Ownership	70%	
First homes	70%	Capped at £250,000

59. For the purpose of the Oadby SDA Cross Boundary Assessment Report, AV has deviated from the

- 50% affordable rent;
- 25% social rent; and
- 25% First Homes.

60. CBRE observes that:

a) Affordable and Social Rent tenures are grouped together, with no indication of how the preferred tenure split will be applied (i.e. division of the 75% 'rented' affordable between the two). CBRE considers this to be unusual practice, as the transfer values for each of these tenures typically significantly differs due to the variant rent levels at which they are restricted (which AV acknowledge in Table 9.1). Because of this difference in transfer values, it is important that a specific tenure mix is identified for viability testing, and for this to be clearly set out within Local Plan draft policy. CBRE's recent experience is that the Council and AV will accept the prioritisation of Affordable Rent over Social Rent in interpreting adopted Plan policy in site-specific viability considerations at determination stage.

b) AV's proposed transfer value (as 55% of market value) for Affordable Rent appears misleading. Typical practice is that Affordable Rent levels are restricted to the lower of the Local Housing Allowance ('LHA') rate for the relevant property size (as published by the VOA) or 80% of market rents. CBRE has provided the LHA rates for April 2025 below for ease.

Weekly LHA rate for April 2025

Leicester BRMA

Shared Accommodation Rate:	**£91.00 per week**
One Bedroom Rate:	**£124.27 per week**
Two Bedrooms Rate:	**£149.59 per week**
Three Bedrooms Rate:	**£178.36 per week**
Four Bedrooms Rate:	**£241.64 per week**

Downloads about the Leicester Broad Rental Market Area (BRMA):

- BRMA map (the area where this LHA rate applies)(1558.3 KB, (PDF))
- Information about the BRMA (543.8 KB, (PDF))

- List of Rents - view a graph of the rents used to set the LHA rate for Leicester

Allowing for management costs, void and bad debt, and then capitalising the net rents at an appropriate investment yield produces the following estimated capitalised rents (i.e. unit transfer values capped at the LHA rate):

- 1-Bed Units: £100,346
- 2-Bed Units: £124,673
- 3-Bed Units: £152,314
- 4-Bed Units: £213,111

However, due to AV proposing to apply a blanket transfer value (as a % of Market Value) across the district, this would (on average) over-state the achievable transfer value (if capped at LHA) in both the Mid-Value and High Value Zones. This will skew the results of the MVR as it will overstate the viability of typologies in these zones.

c) AV's proposed transfer value (as 50% of market value) for Social Rent units appears unduly high. CBRE has sense-checked this assumption using CBRE's Social Rent calculator, which has regard to Regulator of Social Housing data for Registered Provider social housing average rents, making allowances for outgoings, management repairs and maintenance, to determine the value (capitalised yield) of each proposed unit type. This produces the following estimated capitalised rents (i.e. unit transfer values):

- 1-Bed Units: £66,912
- 2-Bed Units: £80,218
- 3-Bed Units: £88,212
- 4-Bed Units: £104,362
- 5-Bed Units: £134,703

Based on the values adopted by AV in Table 7.2 of the Residential Market Paper and Table 3.3 of the Cross Boundary Assessment, the relative (average) transfer values using CBRE's Social Rent calculator would reflect the following (as a % of average market value):

Lower Value Zones: 34%

Mid-Value Zones: 30%

Higher Value Zones: 26%

Cross Boundary: 32%

d) Based on CBRE's calculations, these produce a blended average transfer value of 30%. This is significantly lower than the equivalent transfer value of 50% proposed by AV. CBRE requests that AV evidence how they have calculated this rate, or amends this assumption accordingly. This will presently skew the results of the MVR and Cross Boundary Assessment Report as it will overstate the viability of typologies in these zones and Land South of Gartree Road and East of Oadby.

e) AV have maintained an inclusion of First Homes tenure within the tenure mix. However, AV fails to recognise the recent published NPPF changes, which remove the minimum 25% requirement of First Homes. It may therefore be appropriate for AV to revisit the inclusion of First Homes, or provide greater flexibility in emerging policy to allow developments to propose tenure mixes that respond to market need and demand

Commercial Land Value Assumptions

61. Within the Oadby SDA Cross Boundary Assessment Report, AV proposes a commercial / employment land value of £1,000,000 per acre applied to a site area of 12.36 acres.

62. AV does not provide any transactional evidence to underwrite a land value at this level or confirm whether this is serviced (with the costs of servicing accounted for in appraisal modelling) or unserviced.

63. The use of land allocated for commercial purposes is to be determined, and the commercial land is intended to be spread across the Site to provide a range of uses. It will therefore not be brought forward in one block (or use) as suggested by AV.

64. Based on CBRE's market knowledge of commercial land values in the Midlands, AV's assumption of £1m per acre is an unrealistic land value in this location.

65. CBRE note that the land value suggested by AV is closer to prime industrial levels seen within the 'Golden Triangle' which is therefore inappropriate for a Site without immediate access to the national motorway network. Moreover, CBRE reiterate that a range of uses will be delivered.

66. CBRE request that AV reassess their assumption of land value and refer to transactional evidence.

Baseline Construction Costs

67. AV propose to rely upon published RICS BCIS construction costs for Estate Housing and Flats to inform baseline construction costs for the MVR. Table 4.1 (Appendix 7 – Oadby SDA Cross Boundary Assessment Report) of the MVR outlines the following adopted baseline construction costs:

Table 2: Oadby SDA Viability Assessment | Construction Cost Assumptions

BCIS Category	Cost/m^2	Cost/ft^2
Estate Housing: Generally (Lower Quartile)	£1,380	£128.21
Flats (Apartments): Generally Lower Quartile)	£1,551	£144.09

Source: Aspinall Verdi

68. It is important to recognise that Land South of Gartree Road and East of Oadby will be delivered by a master developer and the high quality and accelerated delivery of sites such as this is underpinned by the use of regional housebuilders. The likes of which may be developing parcels as small as 100 units and do not benefit from the national supply chain discounts achieved by the national / PLC housebuilders.

69. It is CBRE's understanding that SME and regional housebuilders are facing challenges constructing to lower quartile RICS BCIS rates given the rapid inflation in housebuilding labour and materials costs witnessed over the past couple of years. The supply chain impacts have been slow to feed through into RICS BCIS, which again is a backward-looking indicator based on historic building contract tenders.

70. Where possible, construction to RICS BCIS lower quartile would reflect a low specification build. If HDC intends to introduce design and materials enhancements (for example via a Design Code or sustainability criteria), this would typically generate an extra-over cost.

71. CBRE considers that AV's proposed threshold of 'larger sites' at over 50 units is low for setting a 'cut-off' for application of lower quartile versus median RICS BCIS rates and creates an artificial 'cliff edge'. AV does not provide a justification for establishing this threshold at over 50 units and therefore, CBRE requests that AV make this evidenced.

72. Typically, CBRE would expect SME and regional housebuilders to deliver sites of up to 100-150 units. This is consistent with the assumption adopted by AV in their Birmingham Whole Plan Viability Assessment, produced in April 2024 on behalf of Birmingham City Council, within which AV set the threshold between 'Medium Housebuilder' (BCIS Median) and 'Larger Housebuilder' (BCIS LQ) at 100 units. CBRE would therefore recommend that (at the least) this assumption is adjusted upwards for consistency, if not otherwise justified.

73. AV's BCIS data is rebased to Leicestershire & Rutland which CBRE consider to be appropriate. For reference, CBRE has obtained the latest RICS BCIS construction costs for both Harborough and Leicestershire for comparison purposes. Notably, the Harborough dataset is based on a very limited sample of only 4 projects, which CBRE considers is insufficient for this purpose. In comparison, the Leicestershire dataset is based on a more comprehensive sample of 110 projects. The larger sample size for Leicestershire provides a more robust foundation for evidence. The RICS BCIS data is included within **Enclosure 2** for transparency.

74. Furthermore, given the rapid inflation in housebuilding labour and materials costs witnessed over the past couple of years and the slower pace of supply chain impacts and updated Building Regulations feeding through into RICS BCIS (which is a backward-looking indicator based on historic submitted building contract tenders), the adoption of BCIS data itself carries increased risk. Noting that BCIS data demonstrates significantly higher costs for the last 5-year period by comparison to the default period.

75. Therefore, CBRE considers AV's adoption of BCIS data representing tenders restricted to the past five years, to be appropriate in this case. However, AV's BCIS data is dated 20 September 2024 and is therefore 6 months out of date at the time of publication of the evidence base. Build costs have continued to increase with inflation during the intervening period to present day. AV must adopt up to date BCIS construction cost estimates to accurately inform the MVR.

76. The RICS BCIS construction costs locationally rebased for Leicestershire & Rutland, and restricted to the last 5-years, are outlined below (note: published 15 April 2025):

Table 3: RICS BCIS | Base Construction Costs (5 years) rebased to Leicestershire & Rutland

BCIS Category	Cost/m^2	Cost/ft^2	Difference by comparison to AV (%)
Estate Housing: Generally (Median)	£1,703	£158.21	5.5%
Estate Housing: Generally (Lower Quartile)	£1,429	£132.76	3.6%
Flats (Apartments): Generally (Median)	£1,825	£169.55	4.0%
Flats (Apartments): Generally Lower Quartile)	£1,577	£146.51	1.7%

Source: BCIS

77. By comparison to the build cost rates adopted by AV, the latest RICS BCIS data reflects between 1.7% to 5.5% increase in total base construction costs. Accordingly, there will be uplifts to all associated development costs, which are typically percentage linked to base construction (i.e., contingency, professional fees, externals etc).

78. CBRE recommends that base construction costs utilise the latest RICS BCIS (median) costs for the last 5 years. AV's use of outdated and unrealistically low construction costs will erroneously state the viability of typologies tested.

79. Finally, RICS BCIS construction cost estimates do not account for additional costs associated with conformity with Building Regulations Part L (2022), which became enforceable from July 2023, due to the backwards facing nature of the data. It is also necessary to make adjustments to incorporate the actual costs for Building Regulations Part L (2022) and Future Homes Standard (2025) as full extra-over costings in addition to the RICS BCIS median and lower quartile build cost rates (this is discussed further in the subsequent section).

Other Cost Assumptions

Garages

80. AV propose to include an allowance of £10,000 per garage within the MVR.

81. CBRE considers that a cost £10,000 per single garage is very conservative with rates incurred by developers (and agreed at a site-specific level) at or exceeding £10,000 per single garage and £18,000 per double garage locally.

82. The above rates should reflect the absolute minimum costs to be incorporated within the MVR.

External Works

83. Table 4.1 on pg. 7 of the Cross Boundary Assessment Report, confirms AV has applied an allowance of 10% for externals "*given the quantum of infrastructure being delivered by master developer.*" (Cross Boundary Assessment Report – Appendix 2).

84. Firstly, this is inconsistent with AV's approach in their recently published assessments:

    a. Within both the Charnwood Transport Contributions Strategy Viability Report (July 2024) and the Charnwood Initial CIL Viability Assessment (January 2025), AV adopted externals allowances of 15% on greenfield sites.

    b. More recently, within the Charnwood Charnwood Borough Council Community Infrastructure Levy - Viability Study Stakeholder Workshop (May 2025), AV adopted external works allowances of 10% for small to medium residential sites and 20% on larger residential sites.

    c. AV adopted an externals allowance of 15% for strategic sites in the South Worcestershire Development Plan Review & Strategic Sites Viability Assessment (December 2024).

    d. Within the Birmingham Whole Plan Viability Assessment (April 2024), AV adopted an external works of 15% and an externals & infrastructure allowance of 20% for strategic site typologies.

85. Secondly, given Homes England's interest (Land South of Gartree Road and East of Oadby) is a cross-boundary strategic site falling within both HDC and OWBC administrations, CBRE has also considered the evidence base published by OWBC for the Local Plan Regulation 19 consultation, namely the WPVA prepared by HDH (November 2024).

86. Within the OWBC WPVA, HDH adopts an externals allowance of 15% within the viability testing of larger greenfield sites including Homes England's interest 'Site Ref: 27 S of Gartree Road, E of Stoughton Road'.

87. Typically, CBRE would expect an allowance for external works of 15-20% on sites, where lower quartile BCIS construction costs are assumed, to cover on-plot external works, plot connections, and tertiary highways. This is consistent with the assumptions recently adopted by AV in their Charnwood Transport Contributions Strategy Viability Report (July 2024), Charnwood Initial CIL Viability Assessment (January 2025), South Worcestershire Development Plan Review & Strategic Sites Viability Assessment (December 2024) and the Birmingham Whole Plan Viability Assessment (April 2024).

88. However, for clarity, this allowance would only be deemed appropriate for on-parcel housebuilder works (e.g. estate roads and landscaping). It would not be sufficient to meet the off-parcel site preparatory servicing and strategic infrastructure requirements on larger sites, which may be delivered by a master-developer. CBRE would suggest that such site infrastructure costs would need to be considered as a separate cost allowance on a site-specific basis, beyond the typical allowance for external works. This should be taken into account within the recommended finer-grain analysis of larger prospective draft allocations that exceed 250 dwellings.

Biodiversity Net Gain ('BNG')

89. CBRE note that the MVR adopts rates drawn from the DEFRA BNG and Local Nature Recovery Strategies Impact Assessment, which was published in 2019. AV indexes these rates using BCIS All-in TPI to Q3 2024.

90. Given the very significant inflationary climate since the study rates were published, CBRE strongly advocates that the adopted rates are indexed to the present day using BCIS All-in TPI to more accurately reflect the current cost of meeting BNG requirements.

Housing Mix and Space Standards

91. The MVR proposes on pg. 61 that viability testing allows for the extra-over costs for optional Building Regulation requirements, being M4(2) category 2 accessible and adaptable housing at £1,400 per unit, M4(3) (a) category 3 wheelchair adaptable housing at a cost of £8,500 per flatted unit / £12,000 per housing unit, and M4(3) (b) category 3 wheelchair accessible housing at a cost of £8,500 per flatted unit / £27,000 per housing unit.

92. AV state this is based on the Equality and Human Rights Commission & Habinteg report 'A toolkit for local authorities in England: Planning for accessible homes' (October 2018).

93. As highlighted in CBRE's previous representations on behalf of Homes England, dated September 2024, CBRE has reviewed this source and comment that it is unclear how AV have arrived at these cost allowances based on the information contained within the referenced report.

94. CBRE request that AV provide clarity on these calculations and, if not already incorporated, that all costs are appropriately indexed to present date using BCIS All-in TPI.

Building Regulations Part L (2022) & Future Homes Standard

95. AV's MVR adopts a cost of £6,000 per unit is allowed to reflect the full extra-over cost of Part L and FHS (as a supplement to RICS BCIS derived base construction costs).

96. As referenced previously by CBRE in this response, RICS BCIS construction cost estimates do not account for additional costs associated with conformity with Building Regulations Part L (2022), which only became enforceable from July 2023, due to the backwards facing nature of the data. Typically, this would generate a further extra-over cost.

97. Through direct liaison with BCIS as at October 2024, CBRE has been informed that BCIS average price data does not capture Building Regulations Part L (2022) uplift. BCIS has confirmed that:

"The results [average price data] *are based on actual projects that we have received and processed. Because of the lag between regulation changes being announced and the projects built to conform with those regulations reaching us it is unlikely that many (or any) of the sampled schemes would include the new regulations. That will gradually change over time, but the maximum age of results (shown against each category) will indicate to what extent."*

98. Given the passage of time, CBRE contacted BCIS directly again in January 2025 for an update on the above. The response received from BCIS is consistent with that received in October 2024 and BCIS states that the Average Prices Section does not yet include allowances for **Part L (Conservation of Fuel and Power),** Part F, Part O and Part S .

99. CBRE considers this unequivocal evidence that BCIS cost estimates ***do not*** yet include an allowance for Part L, and therefore, additional cost allowances must be made.

100. CBRE's professional opinion is AV's proposed allowance is insufficient to reflect the extra-over sum to meet both Part L (2022) and Future Homes Standard (2025). Based on engagement with both volume and regional housebuilders, CBRE understands that the current estimated costs to meet both Part L/F Building Regulations (2022) and 2025 Future Homes Standard ('FHS') range from £12,500 - £15,000/unit. AV's singular rate of £6,000 per unit falls significantly short of the minimum rate within the spectrum.

101. Whilst construction to FHS is not presently required for conformity with Building Regulations, it is reasonable to expect it will be required from 2026 (noting that the Government allowed a circa 12 month transition period for conformity to the Part L 2022 regulations) and will therefore directly impact on the cost of construction on strategic sites under Local Plan policy once adopted. It is therefore logical to assume that all units would be required to meet the FHS.

102. CBRE proposes that AV should update their allowance to test a minimum rate of £12,500/unit to meet the full cost of FHS as an extra-over RICS BCIS derived base construction costs, on the assumption that a cost towards the lower end of the spectrum may be achievable via technological advancement and the securing of economies of scale by volume housebuilders. However, CBRE is mindful that SME and regional scale developers are less likely to be able to secure such economies.

EV Charging

103. In respect of EV charging, AV conclude on p.61 of the MVR that *"We have not included an additional cost for EV Charging points as this is considered to be encapsulated within FHS / BCIS Costs."*.

104. As set out by CBRE in the subsequent section above, RICS BCIS construction cost estimates are not yet inclusive of EV charging (Part S) as a standardised cost and this has been confirmed directly by BCIS. At this time, CBRE considers that it is standard practice to include an extra over cost for EV charging.

105. CBRE notes that AV make an allowance of £1,000 per housing unit and £2,500 per 4 flats within their Birmingham Whole Plan Viability Assessment (April 2024), which was recently published. CBRE considers this allowance reasonable and, for consistency, would suggest that AV should incorporate such an allowance within the MVR.

Building Safety Levy

106. AV's viability testing within the MVR fails to reflect the introduction of Building Safety Levy ('BSL'), which the Government confirmed on 24 March 2025 will come into force in autumn 2026.

107. The Building Safety Act 2022 ('BSA') provides the Government with the means to impose a levy on all new residential buildings in England to raise revenue to be spent on building safety. The BSL is part of the government's plan to accelerate the pace of remediation of existing buildings. The BSL will apply to all new residential dwellings

and purpose-built student accommodation which require a building control application (excluding affordable housing).

108. The levy rates are set for each local authority area and a discounted levy rate of 50% will apply for developments built on Previously Developed Land. In relation to timescales of payment, the levy must be paid in full prior to receiving a building control completion certificate / final certificate and therefore occupation.

109. The BSL rates for the Harborough is £14.74/m² for Previously Developed Land and £29.47/m² for Non-Previously Developed Land. Noting that Land South of Gartree Road and East of Oadby is Non-Previously Developed Land and will therefore attract the higher levy charge aforementioned.

110. Whilst there remains some uncertainty over the Government's proposals and timeline for implementation it is recommended that the published costs associated with BSL should be incorporated with the viability assessment and/or sensitivity tested as a minimum as it is assumed the levy will be chargeable by the time this development commences.

Contingency

111. AV state on pg. 61 of MVR that 2.5% contingency is allowed on greenfield sites and 5% allowed on brownfield sites.

112. Firstly, this is inconsistent with AV's approach in their recently published assessments:

    a. Within the Charnwood Transport Contributions Strategy Viability Report (July 2024), the Charnwood Initial CIL Viability Assessment (January 2025) and the Charnwood Borough Council Community Infrastructure Levy - Viability Study Stakeholder Workshop (May 2025), AV adopted a contingency of 3.0% on greenfield sites.

    The Initial CIL Viability Assessment, dated January 2025, aligns with the MVR and therefore reflects identical market conditions. Additionally, it pertains to another local authority within Leicestershire and therefore provides no justification for AV to apply a reduced contingency for greenfield sites in other parts of the county.

113. Secondly, given Homes England's interest (Land South of Gartree Road and East of Oadby) is a cross-boundary strategic site falling within both HDC and OWBC administrations, CBRE has also considered the evidence base published by OWBC for the Local Plan Regulation 19 consultation, namely the WPVA prepared by HDH (November 2024).

114. Within the OWBC WPVA, HDH adopts a contingency of 5.0% within the viability testing of Homes England's interest 'Site Ref: 27 S of Gartree Road, E of Stoughton Road'.

115. Within Appendix 2 (Appraisal Assumptions Comparison) of the Cross Boundary Assessment, AV summarises and compares the HDC and OWBC appraisal assumptions in respect of Land South of Gartree Road and East of Oadby. AV incorrectly references that HDH has applied a contingency of 2.5% to Homes England's interest 'Site Ref: 27 S of Gartree Road, E of Stoughton Road' whereas HDH's site-specific appraisal contained within Appendix 12 of the WPVA confirms that a 5.0% contingency has been applied. CBRE request that AV revisits the OWBC WPVA and reviews the site-specific viability appraisal assumptions.

116. CBRE would expect both the AV and HDH evidence bases to adopt consistent contingency allowances for the Site. Applying different rates is unjustified and inherently illogical.

117. CBRE considers that an allowance of 5% contingency on all development costs is logical for the Site consistent with the allowance adopted by HDH in the OWBC WPVA.

Professional Fees

118. Table 4.1 on pg. 7 of the Cross Boundary Assessment Report, confirms AV's an allowance of 7% (of construction cost) for professional fees has been made, *"adjusted to reflect size of development" (p.62).*

119. For comparison purposes, given Homes England's interest (Land South of Gartree Road and East of Oadby) is a cross-boundary strategic site falling within both HDC and OWBC administrations, CBRE has also considered the evidence base published by OWBC for the Local Plan Regulation 19 consultation, namely the Whole Plan Viability Assessment ('WPVA') prepared by HDH (November 2024). Within the WPVA, HDH makes an allowance of 8.0% professional fees for Homes England's interest 'Site Ref: 27 S of Gartree Road, E of Stoughton Road'.

120. It is expected that both the AV and HDH evidence bases to adopt consistent professional fees allowances for the Site. Applying different rates is unjustified and inherently illogical.

121. CBRE would expect professional fees to range from 7-10% across site sizes. This would typically reflect an allowance of 7-8% on the largest sites (i.e. strategic allocations) plus promotion costs, and 10% on the smallest sites reflecting economies of scale.

122. CBRE therefore advocates the professional fees allowance adopted by HDH for the Site, plus promotion costs given the expected delivery strategy for the Site on a Land Trader / Master Developer model.

Sales & Marketing Fees

123. AV adopts an open market sales marketing and promotion allowance of 1.5% of OMS GDV for sales discounts and incentives plus a sales agent allowance of 1.0% of OMS GDV.

124. CBRE would typically expect an allowance of 2.5-3%, however a higher cost allowance is likely on sites delivered by SME and regional housebuilders where a sales marketing presence is required but economies of scale are more limited. This is in line with the allowance of 3.0% made by AV within their Birmingham Whole Plan Viability Assessment.

Affordable Housing Disposal Costs

125. Table 4.1 on pg. 7 of the Cross Boundary Assessment Report, confirms AV's allowance of £10,000 for affordable housing transfer legal costs. However, it is unclear to which affordable housing tenures this applies and also the quantity of affordable housing units.

126. It is typical for disposal costs of First Homes units to match the sales / marketing / legal costs of open market units as these units are sold by housebuilders directly to individuals rather than transferred to a Registered Provider as a bulk sale.

127. CBRE request that clarification is provided by AV for further review.

Section 106 and Infrastructure Costs

128. On pg. 7 of the Cross Boundary Assessment Report, AV specify obtaining *"S106 and infrastructure costs from the strategic site promoters and the Council to create an assumption of c. £20,000 per unit (excluding open space which is covered in the promoters on site infrastructure costs) and c. £31,000 per unit for infrastructure costs."*

129. AV continue to say *"Whilst we have received S106 costs from Harborough District Council and the education costs for the entirety of the site, we have not received S106 costs from Oadby and Wigston Borough Council, therefore we have assumed an additional £2,500 per unit for the Oadby element of the site. This allows for the fact that the education cost for the whole site is included within the figures provided by Harborough DC."*

130. Table 4.1 of the Cross Boundary Assessment Report contains headline S106 cost items (i.e., HDC libraries, HDC healthcare, HDC indoor sports facilities, whole site off-site transport, whole site school contribution & OW school provision/transport mitigation) and infrastructure costs specifically for Land South of Gartree Road and East of Oadby but lacks any detail or evidential underwrite.

131. For comparison purposes, given Homes England's and Urban&Civic's interests (Land South of Gartree Road and East of Oadby) is a cross-boundary strategic site falling within both HDC and OWBC administrations, CBRE has also considered the evidence base published by OWBC for the Local Plan Regulation 19 consultation, namely the Whole Plan Viability Assessment ('WPVA') prepared by HDH (November 2024). CBRE has reviewed the S106 and infrastructure costs contained within the WPVA and it is noted that HDH incorporates S106 costs at £30,338 per unit for Homes England's interest 'Site Ref: 27 S of Gartree Road, E of Stoughton Road'.

132. Homes England and Urban&Civic have also previously made representations on the Aecom infrastructure costs document. These representations highlighted that whilst the total off site contribution to highways seemed reasonable, the number of highways interventions was almost double Homes England's and Urban&Civic's assessment. Should such interventions be required, then the actual costs associated with off site highways works would logically double.

133. The representations also noted that the reinforcement costs associated specifically with providing electricity to the site (i.e., no fossil fuel) and disposal of foul water has not been recognised in the costings we have seen.

134. Homes England and Urban&Civic also highlight that whilst there is no Internal Drainage Board ('IBD') in the area, it should be noted that elsewhere IDBs have introduced 'Surface Water Development Contributions' and there is discussion at present as to whether the Environment Agency / Lead Local Flood Authority could seek to charge the same for major development sites.

135. CBRE request that evidence to substantiate the S106 figures and infrastructure costs adopted is provided for review. It is unclear whether these are up-to-date and reflect the relevant drafted policies within the DLP.

136. Finally, at para. ES 45 of the MVR AV recommends to the Council to not make *"any policy concessions until (i) the education and all other S106/S278 costs are known; (ii) there is full transparency on minimum land values; (iii) updated appraisals have confirmed the viability position."*

137. It is therefore imperative that S106 costs are comprehensively evidenced and finalised for the purposes of plan-making by the Council and Leicestershire County Council (as education authority). This sits outside of the control of the promoters.

Developer Return

138. AV set out in Table 4.1 (Adopted Assumptions) of the Cross Boundary Assessment Report (Appendix 7 of the MVR) that they adopt a developer's return of 17.50% on gross development value ('GDV') on open market housing and 6.0% on GDV on affordable housing.

139. However, CBRE disagree with AV's assertion within para. 5.61 on p.62 that this represents "*a generous margin and allows for 'buffer' in addition to the contingency allowance (5% included)*". Additionally, AV is incorrect in making this statement, as the actual contingency applied by AV in testing is 2.5% for greenfield sites.

Appraisal Modelling

140. AV's cross boundary viability appraisal of the Site is modelled based on a traditional housebuilder development appraisal, which whilst appropriate for small site typologies, it is not the appropriate basis for assessing large-scale strategic sites such as Land South of Gartree Road and East of Oadby. AV's adopted assumptions (Table 4.1) does not allow for an entity to deliver infrastructure and ignores servicing costs and the necessary return on these costs. A land trader / master developer ('LTMD') model would be more accurate methodology to assess a strategic site given scale, complexity and phasing of the Site.

141. Furthermore, Homes England and Urban&Civic rebut AV's statement on pgs. 92-93 of the MVR "*The promoter noted that the scheme achieved a 25% IRR when tested through the master developer model. We have not been provided with an appraisal by the promoter. We note that the assumptions adopted in the promoters master developer model may also consider items such as growth, placemaking benefit and lower minimum land values, all of which would have a substantially positive impact on viability, over and above that shown in our current appraisal outputs".*

142. Homes England and Urban&Civic can confirm that this statement has not been made and request the clarification on the source.

143. As discussed, a land trader / master developer model would take a more appropriate approach for assessing the Site however it would not justify making more optimistic assumptions on viability in the MVR.

Traditional Housebuilder Approach

144. In any case, CBRE's previous technical representations highlighted the inconsistency of AV's approach in their recently published assessments within which AV adopt higher profit rates than that adopted by AV for the MVR. However, AV fails to adequately address this point within the MVR and further comment is provided below:

a. Within the Birmingham Whole Plan Viability Assessment, AV adopted a baseline developer's return of 20% on open market housing GDV.

On this point, AV respond to representations previously made by CBRE, stating that *"Given the make-up of Harborough in particular, i.e., largely greenfield, we are content with the 17.5% level being reflective of development risk. The approach is consistent with several of the surrounding authority areas, notwithstanding some of the areas noted in the consultation feedback which point to where 20% is adopted, i.e., Birmingham (which comprises considerably more previously developed land and is therefore inherently riskier)."*

Given that Birmingham's profit margin was not differentiated between site types and considering the broader market conditions, it is reasonable to conclude that a 20% profit margin should also be adopted in Harborough. This approach ensures consistency and adequately reflects the development risks associated with both greenfield and previously developed sites within the region.

b. Additionally, Charnwood Borough Council has also recently been through Examination in Public on the DLP. The underpinning viability evidence base was prepared by AV and comprised the Charnwood Transport Contributions Strategy Viability Report (July 2024) and the Charnwood Initial CIL Viability Assessment (January 2025). Within which, AV adopted a baseline developer's return of 20% on open market housing GDV.

The Initial CIL Viability Assessment, dated January 2025, aligns with the MVR and therefore reflects identical market conditions. Additionally, it relates to another local authority within Leicestershire and therefore provides no justification for AV to apply a reduced profit margin for greenfield sites in other parts of the county.

145. It should be noted that returns of 17.5% to 20% on GDV have been recommended by Inspectors within Appeal Decisions in recent years, with Inspector's recognising and accommodating the elevated level of commercial risk for developers operating in the current market and seeking to deliver schemes over the next several years.

146. Developer's returns should be adjusted for both construction and market risk. The current market is still demonstrating high risk indicators, given macro-economic conditions and household affordability constraints. As such, risk adjusted returns should be at the upper end of the spectrum.

147. Furthermore, given Homes England's and Urban&Civic's interests (Land South of Gartree Road and East of Oadby) is a cross-boundary strategic site falling within both HDC and OWBC administrations, CBRE has also considered the evidence base published by OWBC for the Local Plan Regulation 19 consultation, namely the Whole Plan Viability Assessment ('WPVA') prepared by HDH (November 2024).

148. Within the OWBC WPVA, HDH adopts a developer's return of 17.50% on GDV on open market housing, 17.5% on GDV on First Homes and 6.0% on GDV on affordable housing for Homes England's interest 'Site Ref: 27 S of Gartree Road, E of Stoughton Road'.

149. It is expected that both the AV and HDH evidence bases adopt consistent developer's returns for the same Site and it is entirely illogical to apply different developer's returns. HDH's conclusion of developer's return demonstrates greater consistency with AV's other recently published assessments (i.e., a developer's return of 20% on GDV on open market sales).

150. Overall, it is CBRE's position that a target operating margin on all sites is at least 20% of GDV. This is not differentiated by tenure and is a broadly consistent return targeted across the industry in the current market.

151. Finally, CBRE also note that AV recently accepted a minimum risk-adjusted developer's return of 20% on GDV on open market housing in a site-specific viability review in Harborough.

Finance Rate

152. AV state on pg. 62 of the MVR and Table 4.1 of the Cross Boundary Assessment that a debit interest rate of 7.5% is adopted. AV further comment that this rate is applied to 100% of the cashflow and includes finance fees. However, AV has actually applied a finance rate of 7.0% to the viability appraisal for Land South of Gartree Road and East of Oadby.

153. CBRE would also highlight that in relation to the Site, the total finance costs amount to £6,347,655 or £1,587 per unit, which looks unfeasibly low given the scale of development and significant infrastructure expenditure required early on in the programme. Given finance costs are intuitively linked to the cashflow profiling, it is therefore imperative that AV's cashflow assumptions are disclosed.

154. Securing development finance has become significantly more expensive since 2021, with lenders seeking risk premiums up to and in excess of 3% over the Bank of England Base Rate (of 4.5% at the time of writing) plus additional arrangement, monitoring, non-utilisation and exit fees. This has hit SME developers and those delivering higher-risk regeneration projects particularly hard, with debt finance at a project level typically ranging from 10%-12% including fees. Volume housebuilders have been more insulated due to longer-term facilities, but as these end and require renegotiating on current market terms, it has fed through to a higher cost of capital across the industry.

155. CBRE note inconsistency of AV's approach in their recently published assessments:

    a) Within the Charnwood Borough Council Community Infrastructure Levy - Viability Study Stakeholder Workshop (May 2025), AV cited that they have applied a finance rate of 8.0% to all typology appraisals including large-scale greenfield sites.

156. CBRE therefore considers 8.0% debit rate on 100% of land and development costs the absolute minimum representative in the current market.

157. AV should revisit their appraisal for Land South of Gartree Road and East of Oadby and incorporate a finance rate of 8.0% for consistency with their other recently published assessments.

Benchmark Land Values

158. CBRE has reviewed the Land Market Paper prepared by AV, dated April 2024, and provided within Appendix 3 of the MVR. The Land Market Paper sets out AV's review of available evidence of land values across Harborough. This is, in turn, used to inform the Benchmark Land Values ('BLVs') applied as viability thresholds for appraisals within viability testing.

159. The BLVs have been extracted directly from the MVR for ease of cross-reference and set out below.

Table 5.15 - Benchmark Land Value Assumptions

Use / Typology	Location / Value Zones	Greenfield / Brownfield	EUV -					Uplift Multiplier	BLV -	
			(per acre) (gross) (rounded)	(per ha) (gross)	Net: Gross (%)	(per acre) (net)	(per ha) (net)	x [X] x [Y]%	(per acre) (net developable) (rounded)	(per ha) (net developable)
Residential	Low Value Zone	Greenfield	£9,000	£22,239	75%	£12,000	£29,652	15.0	£180,000	£444,780
Residential	Mid Value Zone	Greenfield	£9,000	£22,239	75%	£12,000	£29,652	17.50	£210,000	£518,910
Residential	High Value Zone	Greenfield	£9,000	£22,239	75%	£12,000	£29,652	20.0	£240,000	£593,040
Residential	Low Value Zone	Brownfield	£400,000	£988,400	100%	£400,000	£988,400	10.0%	£440,000	£1,087,240
Residential	Mid Value Zone	Brownfield	£400,000	£988,400	100%	£400,000	£988,400	15.00%	£460,000	£1,136,660
Residential	High Value Zone	Brownfield	£400,000	£988,400	100%	£400,000	£988,400	20.0%	£480,000	£1,186,080
The above values are for Plan-making purposes only. This table should be read in conjunction with our Financial Viability Assessment Report and the caveats therein. No responsibility is accepted to any other party in respect of the whole or any part of its contents.										

Source: AspinallVerdi 240129 Harborough Benchmark Land Value Database v0.1

160. However, for the purpose of the three major strategic sites tested within the MVR, AV deviates away from the prescribed BLV for residential greenfield sites set out above ranging from £180,000 to £240,000 per net acre. There is no clear reasoning as to why this deviation has occurred.

161. Section 7 of the MVR outlines the results of AV's strategic site assessment appraisals and concludes a range of Benchmark Land Values ('BLV') applicable to the three strategic sites: These BLVs are set out below for ease of reference:

Table 4: Development Plan Viability Assessment | Strategic Site Benchmark Land Values

Strategic Site	Benchmark Land Value (per net acre)
S1 – Land Between Scraptoft & Bushby	£150,000
MH1, Mh2 & MH3 – Market Harborough Cluster	£150,000
Land South of Gartree Road and East of Oadby – Entire Allocation	£225,000

Strategic Site Viability Moderation

162. The 'Strategic Site Viability Moderation' section of chapter 7 of the MVR outlines the site-specific consultation results for each strategic site considered, which was used to inform 'moderations' to the strategic sites input assumptions by AV.

163. AV report that they have engaged with strategic site promoters, landowners and developers to consult on appraisal inputs such as BLV, profit, etc.

164. AV state that *"in the absence of minimum land values / BLV information"* from the site promotor, landowner and developer engagement, AV's BLVs are predicated on £90,000 per (gross) acre. This equates to an EUV of £9,000 per gross acre and a 10x multiplier.

Adopted Values

165. AV adopt an Existing Use Value ('EUV') per gross acre of £9,000 for the three residential strategic sites. CBRE notes that AV do not apply an EUV greater than £9,000 across any greenfield site typology.

166. As a cross-check, CBRE has reviewed recent transactional evidence and the current market for agricultural land in Leicestershire. The following relevant comparables have been identified.

- Great Bowden, Market Harborough, Leicestershire, LE16 7HF: 133.25 acres of permanent pasture land on the market for £1,400,000 (£10,507 per acre).
- Land at Scalford & Wycomb, Melton Mowbray, Leicestershire, LE14 4PW: 380 acres of agricultural land (subject to tenancy) on the market for £3,900,000 (£10,263 per acre).
- Lot 1 - 24.87 hectares (61.45 acres) of Land North of the A607, Thorpe Arnold, Melton Mowbray, Leicestershire: a 61.45-acre parcel of arable land sold in December 2023 for £600,000 (£9,764 per acre).

167. The comparable evidence demonstrates that agricultural land in Leicestershire currently ranges from £9,750 to £10,500 per acre. Reflecting upon this, AV's adopted generic EUV of £9,000 appears unreasonably low for greenfield residential typologies and strategic sites.

168. Given Homes England's interest (Land South of Gartree Road and East of Oadby) is a cross-boundary strategic site falling within both HDC and OWBC administrations, CBRE has also considered the evidence base published by OWBC for the Local Plan Regulation 19 consultation, namely the WPVA prepared by HDH (November 2024).

169. Within the OWBC WPVA, HDH adopts an EUV of £25,000 per hectare (£10,117 per acre) for Homes England's interest 'Site Ref: 27 S of Gartree Road, E of Stoughton Road'.

170. CBRE would expect both the AV and HDH evidence bases to adopt consistent EUVs for the Site. There is no justification for varying agricultural land values to be applied and this is illogical.

171. HDH's conclusion of agricultural land value demonstrates greater consistency with the current market evidence identified by CBRE's analysis, whilst AV's land value falls below the evidence range.

172. AV should therefore update their strategic sites EUV to ensure consistency with the cross-boundary assessment of the Site by HDH and in line with current market evidence.

Multiplier / Landowner Premium

173. Table 5.15 within the MVR (pg. 65) outlines possible sources and evidence of multipliers / landowner premiums for residential development sites. AV adopts multipliers / landowner premiums ranging from x15 – x20 EUV

on greenfield residential typologies. However, for the purpose of determining BLVs for the three strategic, AV state *"We have adopted lower multipliers for the purposes of assessing strategic sites, with a 10.0 times multiplier based on the scale of the site."*

174. In any case, the BLVs adopted for all three major strategic sites are stated to be £90,000 per gross acre. CBRE's observations are as follows:

    a. Justification has not been provided for the deviation away from the BLV of generic residential greenfield typologies;

    b. CBRE note that AV state a BLV of £90,000 per gross acre has been applied to strategic sites including Homes England and Urban&Civic's interest. However, based on AV's total BLV of £63.54m for the Site and their specified gross site area of 931.57 acres, this equates to only £68,207 per gross acre and therefore requires revision – even based on AV's own proposed BLV.

    c. The adopted BLVs fall well-below or at the lowest end of range set out in published Government research[1] of minimum land values for greenfield strategic land. This states the following on page 8:

    "required levels of premium are routinely protected by way of minimum land price provisions usually contained within option or collaboration agreements and long-term conditional contracts…. Levels vary, but typically, we expect to see figures of circa £100,000 to £150,000 per gross acre".

    d. Finally, given Homes England and Urban&Civic's interest is a cross-boundary strategic site falling within both HDC and OWBC administrations, CBRE has also considered the evidence base published by OWBC for the Local Plan Regulation 19 consultation, namely the WPVA prepared by HDH.

    HDH's cross-boundary assessment adopts a multiplier / landowner premium of x12 EUV in the viability assessment of the Site. This is turn, equates to a BLV of £121,408 per gross acre, which falls within the range of published Government research stated above.

175. The BLVs adopted by AV are unduly low which has significant consequences, as it overstates the viability of the strategic sites – in particular Land South of Gartree Road and East of Oadby, which AV determine as being 'marginally viable'.

Conclusions

176. PPG Plan Making (para. 039 ref: 61-039-20190315) confirms that, in Plan Making, the Council must prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies is not of a scale that will make the plan undeliverable.

177. NPPF, PPG and RICS Guidance[2] therefore requires that a 'policy-on' approach must be adopted with the full costs of Plan policies (including affordable housing) accounted for. It is not appropriate or justified to set

[1] *DCLG (2011) 'Cumulative impacts of regulations on house builders and landowners Research paper'*
[2] *RICS Guidance Note (March 2021) Assessing viability in planning under the National Planning Policy Framework 2019 for England. Para. 3.7.14*

policies within a Plan that are not deliverable and where the underpinning evidence demonstrates (as in this case) that it would be necessary to revert to viability at decision taking stage.

178. AV's Cross Boundary Assessment indicates that **Land South of Gartree Road and East of Oadby is 'marginally viable'** at 40% affordable housing provision including Section 106 (c. £20,000 per unit) and infrastructure costs (c. £31,000 per unit). According to AV, this conclusion is on the basis of a placemaking premium applied to strategic sites and a lack of information provided in respect of land values. Despite this, AV consider that 40% affordable housing provision is 'reasonable'.

179. However, AV's opinion that proposal is 'marginally viable' is an overstatement as the residual land value of AV's appraisal falls short of their assessed Benchmark Land Value (i.e., £57,959,000 vs. £63,540,000). In this case, Land South of Gartree Road and East of Oadby is in fact unviable based on AV's own assessment.

180. Given Homes England and Urban&Civic's interest (Land South of Gartree Road and East of Oadby) is a cross-boundary strategic site falling within both HDC and OWBC administrations, CBRE has also considered the evidence base published by OWBC for the Local Plan Regulation 19 consultation, namely the WPVA prepared by HDH (November 2024). Within this document, HDH conclude that the Site can only deliver a maximum affordable housing provision of 20% plus policy costs.

181. On the basis of the OWBC evidence the 40% affordable housing (in addition to the full range of other requirements) is not justified. Homes England and Urban&Civic therefore propose flexibility in the policy to have the 40% as an 'up to' target and subject to viability considerations

182. As the DLP contains draft strategic allocations of a scale exceeding 250 dwellings, CBRE recommends that, in accordance with PPG Viability ('PPGV'), the specific circumstances of larger sites and strategic allocations should be considered. Therefore, CBRE recommends that AV undertake more fine-grain analysis of larger prospective draft allocations that exceed 250 dwellings such as Land South of Gartree Road and East of Oadby. As discussed previously, AV's Cross Boundary Assessment viability modelled on a basic traditional housebuilder appraisal model despite AV referencing that it *"should be re-worked into a master-developer model with smaller housebuilder delivery phases/plots…"*.

183. Homes England and Urban&Civic would welcome engagement with HDC and Aspinall Verdi to assist in informing this process, in respect of their interests, at the relevant juncture, including relating to the following.

184. Specifically, within AV's conclusions in respect of the Strategic Sites assessed, AV state on pg. 95 of the MVR that "*We would not recommend making any policy concessions until (i) the education and all other S106/S278 costs are known; ii) there is full transparency on minimum land values; and (iii) updated appraisals have confirmed the viability position.*"

185. Furthermore, in relation to the Cross Boundary Assessment, AV state there has been *"a lack of transparency in respect of minimum land values in option / promotion agreements… Prior to allocation the Council should confirm the actual land transaction(s) £ values and circumstances In accordance with PPG Paragraph: 014 and 016."*

186. CBRE considers that preparation of policies in the DLP create a primary risk for failure of the tests of soundness. Notably, HDC's drafted policy approach in the DLP will:

    a. place reliance on a strategic scale greenfield housing land supply to meet the requirements in the HDC that, based on the available evidence, is demonstrably financially unviable and undeliverable at the affordable housing target level (40%);

    b. set an affordable housing policy within DLP Policy HN01 that is not justified based on the available evidence, and therefore places at risk the deliverability of sites within the land supply and ultimately, the Plan; and

c. will necessitate strategic sites resorting to submission of financial viability assessments alongside planning applications at the decision making stage, which both the NPPF and PPG advocate Plans seek to minimise through the setting of deliverable policies.

187. However, DLP Policy HN01 (d) also seeks to place restrictions on submission of viability assessments at the determination stage for departure from the relevant % of affordable housing, citing the following:

188. *"Where it is robustly demonstrated that the required provision of affordable housing would make a scheme unviable, the requirement for a lower level of provision of affordable housing will be considered. In these exceptional circumstances, a clear justification supported by an independent viability assessment will be required. The costs of subsequently reviewing this work on behalf of the Council will be borne by the applicant."*

189. There is no national policy justification (or expectation set in PPG) for a viability case to be made only in *"exceptional circumstances*". This is therefore inconsistent with national policy and guidance and should be removed.

190. In summary, an overly restrictive policy will more likely limit development which rather than boost affordable housing delivery to meet the HDC's needs, will actually further constrain it. Sites must come forward in the first instance if they are to deliver a proportion of affordable housing supply at all.

191. There are clear flaws in the MVR and Cross Boundary Assessment evidence base underpinning the DLP requiring resolution, and in its present form render this as an unsuitable and unsound basis for setting Plan policy.

192. If unresolved, HDC's present strategy for setting affordable housing targets via the DLP ultimately represents a significant risk to the deliverability of the DLP, should it place reliance on a strategic sites supply in delivering upon its housing requirements (including meeting affordable housing needs) over the Plan period, as it will render many sites as financially unviable and undeliverable on a compliant basis. This will cause delays during the determination process whilst viability assessments must be submitted and the negotiations undertaken.

193. CBRE has also highlighted the viability review mechanism within draft Policy HN01 (e) has potentially significant impacts to the delivery of homes in the plan period. CBRE requests clarity on how the mechanism will be operated.

194. CBRE's views have been prepared on behalf of Homes England and Urban&Civic. CBRE reserves the right to undertake further detailed analysis of the MVR and Cross Boundary Assessment upon disclosure of cashflow evidence (as requested) and then provide further information as appropriate.

195. This technical representation has been prepared and approved by the following personnel:

Project Name:	Draft Harborough Local Plan: Regulation 19 Consultation		
Project Number:	Date:	Prepared By:	Verified By:
50BCD0583932	2 May 2025	Sophie Borrowdale | MRICS Associate Director	Matt Spilsbury | MRICS MRTPI Senior Director
CBRE, Henrietta House, Henrietta Place, London W1G 0NB			
Telephone: 020 7182 2000			

Enclosures

Enclosure 1: CBRE Representations (2024)

Draft Harborough Local Plan: Post-Regulation 18 Consultation

Technical representation relating to the Harborough Whole Plan Viability Testing

Prepared by CBRE UK Ltd on behalf of:

- Homes England

September 2024

Contents

Introduction

Procedural Matters

Instruction Purpose

1. CBRE UK Ltd ('CBRE') has been instructed by Homes England, which has interests in Harborough district, and is in the process of promoting these interests through the emerging Harborough District Council ('HDC') Local Plan review.

2. CBRE's instruction relates specifically to preparation of technical feedback on the published Harborough Whole Plan Viability Testing, hereafter referred to as the 'WPVT', which is being prepared by consultants Aspinall Verdi ('AV'). The information published to date by HDC and Aspinall Verdi is as follows:

    a. Harborough Whole Plan Viability Stakeholder Presentation (July 2024)

    b. Harborough Whole Plan Viability Policies Matrix

    c. Harborough Whole Plan Viability Land Market Paper

    d. Harborough Whole Plan Viability Typologies Matrix

    e. Harborough Whole Plan Viability Residential Market Paper

3. The information was shared by HDC following an initial stakeholder consultation event held in July 2024, with HDC seeking feedback from industry stakeholders by Friday 30th August 2024.

4. CBRE understands that Homes England has secured agreement to an extension to this timescale for submission from HDC.

5. CBRE understands that HDC and Aspinall Verdi will review the feedback received and utilise this in refining the methodology and inputs for the WPVT, which will then proceed to test the financial viability of the prospective residential land supply in the district.

6. HDC will then publish a full Whole Plan Viability Assessment report ('WPVA'), inclusive of results and recommendation, as a supporting evidence base to the emerging HDC Draft Local Plan Regulation 19 consultation ('the DLP consultation'), which is presently scheduled to take place in late 2024.

Matters of Representation

Purpose

7. This representation is prepared on behalf of Homes England and provides detailed comments upon the published WPVT, which CBRE understands will inform and underpin emerging housing policies relating to affordable housing targets and other planning obligations to be sought via the emerging Local Plan.

8. Comments are set out under a set of thematic headings to assist cross-reference with the published WPVT material.

Viability in Plan-making: Interpretation of Results

9. Para. 34 of the National Planning Policy Framework ('NPPF') confirms that Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure. Importantly, such policies should not undermine the deliverability of the Plan.

10. Para. 31 of the NPPF requires that the preparation and review of all Plan policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.

11. Paragraph 35 of the NPPF confirms that in order for a Plan to be found 'sound', it must pass the relevant four tests. Intrinsic to these are the requirements for Plans to be demonstrably justified – based on proportionate evidence – and effective. Critically, to be effective a Plan must be deliverable over the plan period.

12. Paragraph 58 of the NPPF subsequently confirms that all viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance.

13. The Government's National Planning Practice Guidance for Viability ('PPGV') confirms the following:

    a. Para. 002 states that viability assessment should be utilised to ensure that **policies are realistic** and the total cumulative cost of all relevant policies will not undermine deliverability of the plan.

    b. Para. 002 also confirms that policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and **allows for the planned types of sites and development to be deliverable**, without the need for further viability assessment at the decision making stage.

14. This is reiterated in PPG for Plan Making at para. 39.

15. In summary, the NPPF and PPG require that both infrastructure provision and affordable housing needs must be taken account of when setting policy requirements in Plans, notably for affordable housing. The policy requirements must allow for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage.

16. To ensure that the DLP meets the NPPF tests of soundness it will be necessary for Aspinall Verdi to have due regard to the above requirements when making recommendations for DLP policy targets utilising the WPVA results, and for HDC to ensure consistency when translating recommendations into policy criteria in the emerging DLP.

Technical Deficiencies

17. Having conducted a detailed review of the published WPVT documentation, CBRE has identified a series of technical deficiencies in the adopted methodology and inputs.

18. In addition, several requests for clarification from AV are made, where evidenced justification is not provided.

19. These points are raised under the following thematic sub-sections.

Residential Typologies

20. Site specific comments are to follow.

Unit Sizes & Mixes

21. Site specific comments are to follow.

Residential Value Assumptions

Evidence Base

22. AV's Residential Market Paper, dated April 2024, outlines the background to the value assumptions proposed for use in the WPVT. It refers to the following information:

- National and Regional Market Overviews
- Existing Evidence Base on Residential Sales Values
- Aspinall Verdi Research
    - New Build Achieved Values
    - New Build Asking Prices
    - Second-Hand Achieved Values
    - Site-Specific Viability Assessments

23. CBRE observes the following:

a) The Residential Market Paper does not report a single new build achieved value for 1-bed or 2-bed flats across any of the identified areas. Therefore, AV's achieved value data for flats relies on second hand achieved values in the Leicester Fringe and Market Harborough areas (noting that there are no reported second hand achieved values for flats in the Lutterworth area). In addition, AV's new build asking price data includes no data for flats. Therefore, AV's value assumptions for 1-bed and 2-bed flats are based wholly on second-hand achieved values in the Leicester Fringe and Market Harborough areas. CBRE considers this to be a limited evidence base. On this basis, there should be a high degree of caution and conservatism applied in the flatted unit values adopted in the WPVT, given it appears that the local market is unlikely to support open-market flatted development.

b) Whilst there is evidence of new build achieved values provided for houses across AV's defined market value areas, the sample of each is not clear. AV report that the dataset is made up of around 230 transactions over the 18 months to April 2024, but do not specify the quantity of sales per unit type in each area. As this evidence is not published for stakeholder review, it is uncertain how reliable the reported average new build achieved values are, given there is a perceived risk that the samples are skewed to limited locations.

c) AV's evidence base relating to new build asking prices relies heavily on data from new build developments in Market Harborough (4 of the 7 sites referenced), which AV identifies as a 'high value area' within its proposed defined market value areas for the WPVT. The three remaining developments identified are located in Lutterworth and in the rural settlement area, with no evidence provided from the Leicester Fringe area. From a locational perspective, this presents a risk of skewing all adopted values towards the upper end. CBRE notes that there is a reasonable level of new build data available on the fringe of Leicester (noting that this sits on the Harborough / Oadby & Wigston / Charnwood boundary), which

would be relevant to inform current market new build asking prices for the Leicester Fringe area and the 'medium value area' accordingly (with modest location adjustment). For example:

i. Bellway – Stoughton Park, Oadby, Leicestershire - https://www.bellway.co.uk/new-homes/east-midlands/stoughton-park

ii. David Wilson Homes – Thorpebury in the Limes, Leicestershire https://www.dwh.co.uk/new-homes/dev-001123-thorpebury-in-the-limes/?utm_source=google&utm_medium=local

d) Furthermore, within each development cited by AV, the asking price data predominantly reflects larger semi-detached and detached properties. AV report evidence of just two available terraced properties at one development. This suggests a limited sample for smaller properties, which again should lead AV to exercise caution in the sales values to be adopted for the WPVT.

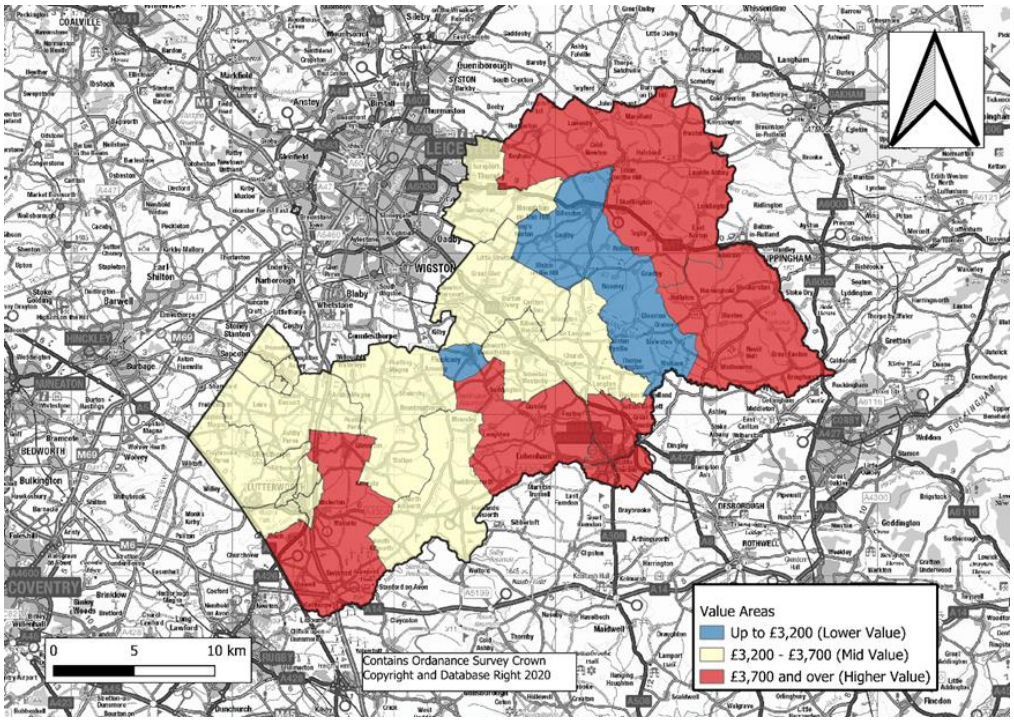
24. CBRE considers that the evidence base relating to new build asking prices is weak. This section of their evidence relies heavily on asking price data from new build developments in Market Harborough (4 of the 7 assessed), which Aspinall Verdi identify as a 'high value area'.

25. The three remaining developments identified are located in Lutterworth and in the rural settlement area. CBRE notes that Residential Market Paper reports no new build asking price data for the 'Leicester Fringe' area.

26. As a result, CBRE questions the reliability of the residential value assumptions subsequently adopted for WPVT.

Adopted Value Assumptions

27. AV's Residential Market Paper outlines the background to the unit (and £/m^2) value assumptions proposed for the WPVT. AV propose division of the district into three market 'value zones' (by electoral ward) on page 20 of the Stakeholder Workshop presentation. This is replicated overleaf.



Lower Value Zone Wards	Billesdon, Fleckney,
Mid Value Zone Wards	Thurnby and Houghton, Glen, Kibworth, Orchard, Brookfield, Swift, Dunton, Sutton, Broughton, Astley, Peatling, Bosworth, Springs, Ullesthorpe, Primethorpe,
Higher Value Zone Wards	Tilton, Nevill, Great Bowden, Arden, Lubenham, Little Bowden, Welland, Logan, Misterton.

28. Table 7.2 of the Residential Market Paper outlines AVs proposed residential value input for WPVT for each of their defined market value zones. This is replicated overleaf.

Table 7.2 - Market Value Assumptions (£) (February 2024)

Property type	Floor area sqm	Higher Value Zone	Mid Value Zone	Lower Value Zone
1 Bed Flat	50	£195,000	£175,000	£125,000
2 Bed Flat	61	£270,000	£230,000	£180,000
1 Bed House	58	£230,000	£190,000	£130,000
2 Bed House	70	£290,000	£245,000	£180,000
3 Bed House	93	£385,000	£330,000	£255,000
4 bed House	120	£500,000	£415,000	£335,000
5 Bed House	163	£665,000	£575,000	£515,000

Source: AspinallVerdi, February 2024.

29. Table 7.1 of the Residential Market Paper presentation presents the AV's proposed assumptions on a m^2 basis:

Table 7.1 - Market Values Assumptions (£ psm) (February 2024)

Property type	Floor area sqm	Higher Value Zone	Mid Value Zone	Lower Value Zone
1 Bed Flat	50	£4,130	£3,430	£2,560
2 Bed Flat	61	£4,440	£3,300	£2,500
1 Bed House	58	£4,340	£3,430	£2,290
2 Bed House	70	£4,220	£3,500	£2,560
3 Bed House	93	£4,110	£3,490	£2,760
4 bed House	120	£4,200	£3,480	£2,770
5 Bed+ House	163	£4,010	£3,440	£2,770

Source: AspinallVerdi, February 2024.

30. CBRE has identified that there is no correlation between AV's proposed residential values presented in Tables 7.1 and 7.2.

31. CBRE's table below presents a comparison between AV's reported values/m^2 presented in Table 7.1 and values calculated by CBRE based on those AV values presented in Table 7.2. The emboldened figures highlight the greater value in each comparison.

Property Type	Sqm	Higher Value Zone		Mid Value Zone		Lower Value Zone	
		AV Reported £/sqm	CBRE Calculated £/sqm	AV Reported £/sqm	CBRE Calculated £/sqm	AV Reported £/sqm	CBRE Calculated £/sqm
1-Bed Flat	50	**£4,130**	£3,900	£3,430	**£3,500**	**£2,560**	£2,500
2-Bed Flat	61	**£4,440**	£4,426	£3,300	**£3,770**	£2,500	**£2,951**
1-Bed House	58	£4,340	**£3,966**	**£3,430**	£3,276	**£2,290**	£2,241
2-Bed House	70	**£4,220**	£4,143	£3,500	£3,500	£2,560	**£2,571**
3-Bed House	93	£4,110	**£4,140**	£3,490	**£3,548**	**£2,760**	£2,742
4-Bed House	120	**£4,200**	£4,167	**£3,480**	£3,458	£2,770	**£2,792**
5+ Bed House	163	£4,010	**£4,080**	£3,440	**£3,528**	£2,770	**£3,160**

32. From CBRE's analysis, it appears, the values/m^2 presented by AV in Table 7.1 reflect a different set of figures, with no observable relation to the absolute dwelling capital value assumptions outlined in Table 7.2 for WPVT. The discrepancy is of such a scale that it cannot possibly be due to a rounding issue, rather something more fundamental.

33. It is therefore unclear to CBRE:

    a. which set of residential market values that AV proposes to utilise in the WPVT; and

    b. how these values were actually arrived at, in translating from the evidence in the Residential Market Report.

34. CBRE recommend that these values are revisited, clarified and corrected by AV.

35. In light of this discrepancy, and in the absence of a clear position at this stage, CBRE have relied upon the values calculated by CBRE in the table above in order to provide further commentary on the values for WPVT.

36. CBRE observes the following:

    a) On p.33 of the Residential Market Paper, AV state *"we note that these value assumptions appear to be in line with the asking prices in the current market, as established in section 6 of this report."* It is CBRE's experience that there is a typical discount from asking prices to achieved residential sales (net) prices of 3-5% in the current market, which reflects the incentives and discounts offered by housebuilders (and also negotiation in the re-sale market) due to ongoing challenging trading conditions, and therefore, CBRE consider that this is not a reliable basis upon which to accurately estimate residential values. A discount of 3-5% from asking prices should be demonstrable to reflect actual achieved transaction prices.

    b) CBRE note that AV's proposed values for 2-bed flats appear high in comparison to AV's published evidence. As noted previously, the market data relied upon by AV is limited. The evidence reported in the Residential Market Paper suggests an average value of a 1-bed flat of £153,522 in Market Harborough, which is considered a high-value area. Therefore, AV's adopted value of £195,000 for a 1-bed flat in the higher value zone reflects a 27% premium on the achieved second-hand values, which is likely to be unachievable. Clarification from AV is sought to justify this level of premium. Otherwise, given

deliverability is key to the NPPF test of soundness, it is recommended that a more cautious approach is taken to flatted unit values in the WPVT.

c) CBRE note that AV's proposed values for 2-bed houses in the higher value zone appears high in comparison to AV's published evidence. AV's reported average new build achieved values for 2-bed houses range from £222,451 to £256,617, whilst the second hand achieved values range from £241,598 to £262,559. Their evidence for asking price data includes two 2-bed terraced houses in Market Harborough from £284,995 - £289,995 and one 2-bed semi at £260,000. Therefore, it appears AV have based their higher value zone 2-bed house value of £290,000 on a very limited sample of asking prices on only two properties. Given the premium of asking prices over achieved prices, and the very small evidence base, CBRE considers this to be an unreliable sample which potentially leads to an overestimation of achievable residential values.

d) CBRE note that AV's proposed values for 4-bed houses in the higher value zones also appear high in comparison to AV's published evidence. AV's reported average new build achieved values for 4-bed houses range from £368,986 to £441,617, whilst the second hand achieved values range from £390,141 to £425,488. Their evidence for asking price data includes a total of 52 units which range from £314,995 to £659,995. However, CBRE notes that at most developments assessed by AV, asking prices for 4-bed houses were sub-£500,000. Based on this evidence, it appears that AV have based their higher-value zone 4-bed house value of £500,000 on a small selection of asking price data with a limited sample of developments and at the upper end of the demonstrable range. As above, given the premium of asking prices over achieved prices, and the limited evidence base, CBRE considers this to be an unreliable sample which potentially leads to an overestimation of achievable residential values.

Affordable Housing Target and Assumptions

37. Page 25 of the Stakeholder Workshop presentation states an affordable housing target of *"40% affordable housing of dwellings on developments of 10no. or more net dwellings."* It also outlines the following tenure split:

- 75% affordable or social rent
- 25% affordable home ownership

38. Table 9.1 of the Residential Market Paper outlines AV's proposed affordable housing transfer values:

Table 9.1 - Affordable Housing Transfer Values Assumptions (March 2024)

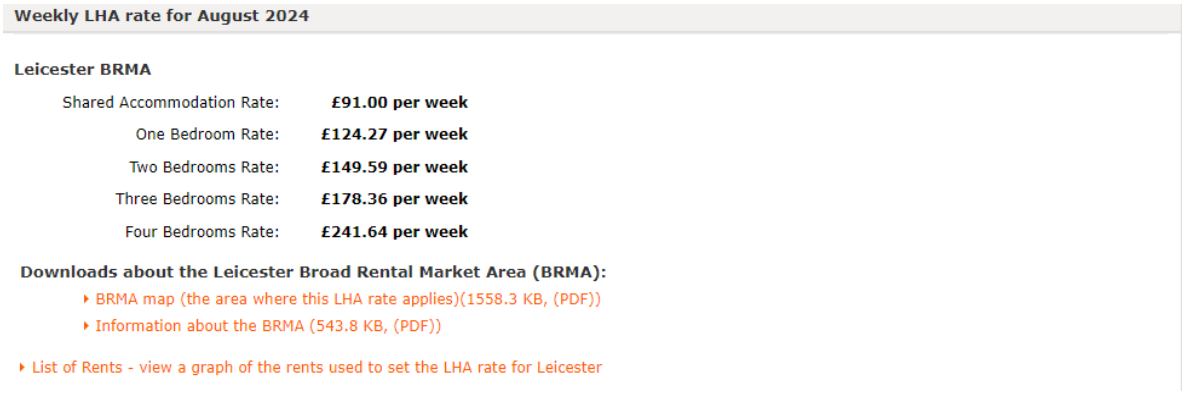
Tenure	Transfer Value (% of MV)	Comments
Social Rent	50%	
Affordable rent	55%	
Low-Cost Home Ownership	70%	
First homes	70%	Capped at £250,000

39. CBRE observes that:

a) Affordable and Social Rent tenures are grouped together, with no indication of how the preferred tenure split will be applied (i.e. division of the 75% 'rented' affordable between the two). CBRE considers this to be unusual practice, as the transfer values for each of these tenures typically significantly differs due to the variant rent levels at which they are restricted (which AV acknowledge in Table 9.1). Because of this

difference in transfer values, it is important that a specific tenure mix is identified for viability testing, and for this to be clearly set out within DLP draft policy. CBRE's recent experience is that the Council and AV will accept the prioritisation of Affordable Rent over Social Rent in interpreting adopted Plan policy in site-specific viability considerations at determination stage.

b) AV's proposed transfer value (as 55% of market value) for Affordable Rent appears misleading. Typical practice is that Affordable Rent levels are restricted to the lower of the Local Housing Allowance ('LHA') rate for the relevant property size (as published by the VOA) or 80% of market rents. CBRE has provided the LHA rates for August 2024 below for ease.



Weekly LHA rate for August 2024

Leicester BRMA

Shared Accommodation Rate:	**£91.00 per week**
One Bedroom Rate:	**£124.27 per week**
Two Bedrooms Rate:	**£149.59 per week**
Three Bedrooms Rate:	**£178.36 per week**
Four Bedrooms Rate:	**£241.64 per week**

Downloads about the Leicester Broad Rental Market Area (BRMA):

- BRMA map (the area where this LHA rate applies)(1558.3 KB, (PDF))
- Information about the BRMA (543.8 KB, (PDF))

- List of Rents - view a graph of the rents used to set the LHA rate for Leicester

Allowing for management costs, void and bad debt, and then capitalising the net rents at an appropriate investment yield produces the following estimated capitalised rents (i.e. unit transfer values capped at the LHA rate):

- 1-Bed Units: £100,346
- 2-Bed Units: £124,673
- 3-Bed Units: £152,314
- 4-Bed Units: £213,111

However, due to AV proposing to apply a blanket transfer value (as a % of Market Value) across the district, this would (on average) over-state the achievable transfer value (if capped at LHA) in both the Mid-Value and High Value Zones. This will skew the results of the WPVT as it will overstate the viability of typologies in these zones.

c) AV's proposed transfer value (as 50% of market value) for Social Rent units appears unduly high. CBRE has sense-checked this assumption using CBRE's Social Rent calculator, which has regard to Regulator of Social Housing data for Registered Provider social housing average rents, making allowances for outgoings, management repairs and maintenance, to determine the value (capitalised yield) of each proposed unit type. This produces the following estimated capitalised rents (i.e. unit transfer values):

- 1-Bed Units: £67,421
- 2-Bed Units: £70,092
- 3-Bed Units: £77,173
- 4-Bed Units: £91,065

Based on the values adopted by AV in Table 7.2, the relative (average) transfer values using CBRE's Social Rent calculator would reflect the following (as a % of average market value):

Lower Value Zones: 37%

Mid-Value Zones: 28%

Higher Value Zones: 24%

d) Based on CBRE's calculations, these produce a blended average transfer value of 30%. This is significantly lower than the equivalent transfer value of 50% proposed by AV. CBRE requests that AV evidence how they have calculated this rate, or amends this assumption accordingly. This will presently skew the results of the WPVT as it will overstate the viability of typologies in these zones.

e) AV have maintained an inclusion of First Homes tenure within the tenure mix. CBRE notes that the latest open consultation on the proposed reforms to the NPPF by MHCLG[1] includes the removal of the requirement for a minimum of 25% of affordable housing units secured from S106 as First Homes. Whilst this is yet to be implemented in national policy, CBRE recommends that this is taken into consideration by Aspinall Verdi and HDC in WPVT and the emerging DLP.

Baseline Construction Costs

40. AV propose to rely upon published RICS BCIS construction costs for Estate Housing and Flats to inform baseline construction costs for the WPVT. Page 28 of the Stakeholder Workshop presentation outlines the following adopted baseline construction costs:

Type	Cost/m^2	Cost/ft^2	BCIS Category
Houses: Medium Housebuilder (4-50 units)	£1,548	£143.81	Estate Housing: Generally (Median)
Houses: Larger Housebuilder (51+ units and above)	£1,362	£126.53	Estate Housing: Generally (Lower Quartile)
Flats/Apartments	£1,793	£166.58	Flats (Apartments): Generally (Median)

41. CBRE note that it is unclear at which date this data is reported, to which location this it has been rebased to, or the sample period it is restricted to. It is also unclear which cost level (i.e. lower quartile, median, etc) AV have adopted for Flats. These are highly relevant points, which should be transparently disclosed, as they will directly inform the WPVT cost inputs and results generated.

42. Assuming there is a sufficient RICS BCIS reported sample size, CBRE would typically expect up-to-date data with tenders restricted to the past five years and, in this case, locationally rebased to Harborough. To examine this CBRE has obtained the latest RICS BCIS construction costs for both Harborough and Leicestershire for

[1] *MHCLG (2024). Proposed Reforms to the National Planning Policy Framework and other changes to the planning system (Proposed reforms to the National Planning Policy Framework and other changes to the planning system - GOV.UK (www.gov.uk))*

comparison purposes. Notably, the Harborough dataset is based on a very limited sample of only 4 projects, which CBRE considers is insufficient for this purpose. In comparison, the Leicestershire dataset is based on a more comprehensive sample of 110 projects. The larger sample size for Leicestershire provides a more robust foundation for evidence. The RICS BCIS data is included within **Enclosure 1** for transparency.

43. The RICS BCIS construction costs locationally rebased for Leicestershire, and restricted to the last 5-years, are outlined below (note: published 24th August 2024):

BCIS Category	Cost/m^2	Cost/ft^2
Estate Housing: Generally (Median)	£1,613	£149.85
Estate Housing: Generally (Lower Quartile)	£1,378	£128.02
Flats (Apartments): Generally (Median)	£1,753	£162.86

44. CBRE's comment as follows:

    a. The construction costs adopted by AV for estate housing appear lower than across the Leicestershire region. CBRE requests that AV clarify the parameters of the data relied upon for the purpose of this assessment.

    b. It is CBRE's understanding that SME and regional housebuilders are now facing challenges constructing to lower quartile RICS BCIS rates given the rapid inflation in housebuilding labour and materials costs witnessed over the past 24 months. The supply chain impacts have been slow to feed through into RICS BCIS, which again is a backward-looking indicator based on historic building contract tenders.

    c. Where possible, construction to RICS BCIS lower quartile would reflect a low specification build. If HDC intends to introduce design and materials enhancements (for example via a Design Code or sustainability criteria), this would typically generate an extra-over cost.

    d. RICS BCIS construction cost estimates do not account for additional costs associated with conformity with Building Regulations Part L (2022), which became enforceable from July 2023, due to the backwards facing nature of the data. Typically, this would generate a further extra-over cost.

    e. CBRE considers that AV's proposed threshold of a 'larger housebuilder' at 51 units is low for setting a 'cut-off' for application of lower quartile versus median RICS BCIS rates and creates an artificial 'cliff edge'. AV does not provide a justification for establishing this threshold at 51 units and therefore, CBRE requests that AV make this evidenced.

    f. Typically, CBRE would expect SME and regional housebuilders to deliver sites of up to 100-150 units. This is consistent with the assumption adopted by AV in their Birmingham Whole Plan Viability Assessment, produced in April 2024 on behalf of Birmingham City Council, within which AV set the threshold between 'Medium Housebuilder' (BCIS Median) and 'Larger Housebuilder' (BCIS LQ) at 100 units. CBRE would therefore recommend that (at the least) this assumption is adjusted upwards for consistency, if not otherwise justified.

Other Cost Assumptions

Garages

45. AV propose to include an allowance of £8,000 per garage within the WPVT.

46. CBRE considers that a cost £8,000 per single garage is low, with rates incurred by developers (and agreed at a site-specific level) at or exceeding £10,000 per single garage and £18,000 per double garage locally.

47. The above rates should reflect the absolute minimum costs to be incorporated within the WPVT.

External Works

48. AV propose to include an allowance of 10-15% for external works within the WPVT, which they state is a *"standard assumption, dependent on typology (e.g. flatted/housing)."* AV also state that 'Site Infrastructure Costs' are *"inc. in External Works for generic typologies"*, albeit the justification for this is unclear.

49. Typically, CBRE would expect an allowance for external works of 15-20% on sites, where lower quartile BCIS construction costs are assumed, to cover on-plot external works, plot connections, and tertiary highways. This is consistent with the assumptions recently adopted by AV in their Charnwood Transport Contributions Strategy Viability Report, produced in July 2024 on behalf of Charnwood Borough Council and Leicestershire County Council, in which 20% is allowed for external works.

50. However, for clarity, this allowance would only be deemed appropriate for on-parcel housebuilder works (e.g. estate roads and landscaping). It would not be sufficient to meet the off-parcel site preparatory servicing and strategic infrastructure requirements on larger sites, which may be delivered by a master-developer. CBRE would suggest that such site infrastructure costs would need to be considered as a separate cost allowance on a site-specific basis, beyond the typical allowance for external works. This should be taken into account within the recommended finer-grain analysis of larger prospective draft allocations that exceed 250 dwellings.

51. Site specific infrastructure information, relevant to Homes England's interests, is to follow.

Biodiversity Net Gain ('BNG')

52. Site specific comments will follow.

Housing Mix and Space Standards

53. AV's Stakeholder Workshop presentation proposes on p.29 that viability testing will allow for the extra-over costs for optional Building Regulation requirements, being M4(2) category 2 accessible and adaptable housing at £645 per unit, M4(3) (a) category 3 wheelchair adaptable housing at a cost of £8,500 per flatted unit / £12,000 per housing unit, and M4(3) (b) category 3 wheelchair accessible housing at a cost of £8,500 per flatted unit / £27,000 per housing unit.

54. AV state this is based on the Equality and Human Rights Commission & Habinteg report 'A toolkit for local authorities in England: Planning for accessible homes' (October 2018).

55. CBRE has reviewed this source and comment that it is unclear how AV have arrived at these cost allowances based on the information contained within the referenced report.

56. CBRE request that AV provide clarity on these calculations and, if not already incorporated, that all costs are appropriately indexed to present date using RICS BCIS All-in TPI.

Building Regulations Part L (2022) & Future Homes Standard

57. AV states on p.18 of the Policies Matrix Report that they will *"include explicit allowances for future homes standards within our viability testing"* which they state is to be *"based on the Future Homes Standards - MHCLG Consultation on changes to Parts L and F of the Building Regulations Option 2 - 'Fabric plus technology'. This is an allowance to achieve 2025 Part L zero carbon ready homes."*

58. AV's Stakeholder Workshop presentation proposes that a cost of £4,000 per unit is allowed to reflect the full extra-over cost of Part L and FHS (as a supplement to RICS BCIS derived base construction costs).

59. As referenced previously by CBRE in this response, RICS BCIS construction cost estimates do not account for additional costs associated with conformity with Building Regulations Part L (2022), which only became enforceable from July 2023, due to the backwards facing nature of the data. Typically, this would generate a further extra-over cost.

60. CBRE's professional opinion is AV's proposed allowance is insufficient to reflect the extra-over sum to meet both Part L (2022) and Future Homes Standard (2025). Based on engagement with both volume and regional housebuilders, CBRE understands that the current estimated costs to meet both Part L/F Building Regulations (2022) and 2025 Future Homes Standard ('FHS') range from £8,000/unit to £10,000/unit. AV's singular rate of £4,000 per unit falls significantly short of the minimum rate within the spectrum.

61. Whilst construction to FHS is not presently required for conformity with Building Regulations, it is reasonable to expect it will be required from 2025/26 (noting that the Government allowed a circa 12 month transition period for conformity to the Part L 2022 regulations) and will therefore directly impact on the cost of construction on sites under DLP policy once adopted. It is therefore logical to assume that all units would be required to meet the FHS.

62. CBRE proposes that AV should update their allowance to test a minimum rate of £10,000/unit to meet the full cost of FHS as an extra-over RICS BCIS derived base construction costs, on the assumption that a cost towards the lower end of the spectrum may be achievable via technological advancement and the securing of economies of scale by volume housebuilders. However, CBRE is mindful that SME and regional scale developers are less likely to be able to secure such economies.

EV Charging

63. AV propose on p.30 of the Stakeholder Workshop presentation that costs for EV Charging are *"assumed to be incorporated into BCIS costs"*.

64. It is CBRE's understanding that RICS BCIS construction cost estimates are not yet inclusive of EV charging as a standardised cost. At this time, CBRE considers that it is standard practice to include an extra over cost for EV charging.

65. CBRE notes that AV make an allowance of £1,000 per housing unit and £2,500 per 4 flats within their Birmingham Whole Plan Viability Assessment, which was recently published. CBRE considers this allowance reasonable and, for consistency, would suggest that AV should incorporate such an allowance within the WPVT.

Contingency

66. AV state on p.31 of the Stakeholder Workshop presentation that 2.5% contingency is allowed on greenfield sites and 5% allowed on brownfield sites.

67. CBRE considers that an allowance of 5% contingency on all development costs is logical across all sites, at this stage.

Professional Fees

68. AV make an allowance of 7% for professional fees, *"based on recent FVA evidence and industry standard assumptions"*.

69. CBRE would expect professional fees to range from 7-10% across site sizes. This would typically reflect an allowance of 7-8% on the largest sites (i.e. strategic allocations) plus promotion costs, and 10% on the smallest sites reflecting economies of scale.

Sales & Marketing Fees

70. AV propose to include a sales and marketing allowance of 1.5% of OMS GDV.

71. CBRE would typically expect an allowance of 2.5-3%, however a higher cost allowance is likely on sites delivered by SME and regional housebuilders where a sales marketing presence is required but economies of scale are more limited. This is in line with the allowance of 3.0% made by AV within their Birmingham Whole Plan Viability Assessment.

Section 106 Costs

72. AV's Stakeholder Workshop presentation states that site specific S106 costs are 'TBC'.

73. CBRE recommends that these costs are considered by HDC and quantified for use both in typology testing and in finer-grain viability testing for strategic allocations as part of the WPVT.

Developer Return

74. P.33 of the Stakeholder Workshop presentation states that AV propose to adopt a developer's return of 17.50% on gross development value ('GDV') on open market housing.

75. Firstly, this is inconsistent with AV's approach in their recently published assessments:

    a. Within both the Birmingham Whole Plan Viability Assessment and Charnwood Transport Contributions Strategy Viability Report, AV adopted a baseline developer's return of 20% on open market housing GDV.

76. CBRE considers that a developer's return of 20% on OMS GDV is appropriate. In the current challenging market trading conditions, which are impacting heavily on reservation and transaction rates as well as suppressing values, it is appropriate that risk adjusted returns are applied at the upper end of the range set out within PPGV.

77. It should be noted that returns of 18.5% to 20% on GDV have been recommended by Inspectors within Appeal Decisions during 2023, with Inspector's recognising and accommodating the elevated level of commercial risk for developers operating in the current market and seeking to deliver schemes over the next several years.

78. CBRE also note that AV recently accepted a minimum risk-adjusted developer's return of 20% on GDV on open market housing in a site-specific viability review in Harborough.

79. Finally, CBRE highlight that for larger sites to be delivered under a master developer model, the simple residual appraisal model adopted – and associated returns – do not apply. An appropriate master developer model structure, and associated project (and housebuilder) returns will be required to be considered as part of the site specific appraisals for larger strategic sites.

Finance Rate

80. AV state on p.32 of the Stakeholder Workshop presentation that a debit interest rate of 7.5% is adopted.

81. Securing development finance has become significantly more expensive since 2021, with lenders seeking risk premiums up to and in excess of 3% over the Bank of England Base Rate (of 5.0% at the time of writing) plus additional arrangement, monitoring, non-utilisation and exit fees. This has hit SME developers and those

delivering higher-risk regeneration projects particularly hard, with debt finance at a project level typically ranging from 10%-12% including fees. Volume housebuilders have been more insulated due to longer-term facilities, but as these end and require renegotiating on current market terms, it has fed through to a higher cost of capital across the industry.

82. On balance, CBRE therefore considers an 8.0% debit rate on 100% of land and development costs the absolute minimum representative in the current market (i.e., circa 3% premium over the BoE base rate).

Benchmark Land Values

83. Site specific comments to follow.

Conclusions

84. PPG Plan Making (para. 039 ref: 61-039-20190315) confirms that, in Plan Making, the Council must prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies is not of a scale that will make the plan undeliverable.

85. NPPF, PPG and RICS Guidance[2] therefore requires that a 'policy-on' approach must be adopted with the full costs of Plan policies (including affordable housing) accounted for. It is not appropriate or justified to set policies within a Plan that are not deliverable and where the underpinning evidence demonstrates (as in this case) that it would be necessary to revert to viability at decision taking stage.

86. To ensure that the DLP meets the NPPF tests of soundness it will be necessary for Aspinall Verdi to have due regard to the above requirements when making recommendations for DLP policy targets utilising the WPVA results, and for HDC to ensure consistency when translating recommendations into policy criteria in the emerging DLP.

87. Having conducted a detailed review of the published WPVT documentation, CBRE has identified a series of technical deficiencies in the adopted methodology and inputs, which may skew the results arising if they are taken forward into viability testing. In addition, several requests for clarification from AV are made, where evidenced justification is not provided.

88. In addition, CBRE note that the WPVT proposes to cap the capacity of the site typologies tested to 250 dwellings.

89. Given it is expected that the DLP will contain draft strategic allocations of a scale exceeding 250 dwellings, CBRE recommends that, in accordance with PPG Viability ('PPGV'), the specific circumstances of larger sites and strategic allocations should be considered. Therefore, CBRE recommends that AV undertake more fine-grain analysis of larger prospective draft allocations that exceed 250 dwellings. Homes England would welcome engagement with HDC and Aspinall Verdi to assist in informing this process, in respect of their interests, at the relevant juncture.

[2] *RICS Guidance Note (March 2021) Assessing viability in planning under the National Planning Policy Framework 2019 for England. Para. 3.7.14*

90. CBRE's views have been prepared on behalf of Homes England and CBRE reserves the right to undertake detailed analysis of the WPVT upon disclosure of evidence and provide further information as appropriate.

91. This technical representation has been prepared and approved by the following personnel:

Ben Speakman	Matt Spilsbury MRICS MRTPI
Graduate Surveyor	Senior Director
National Planning & Development	National Planning & Development
CBRE UK Limited	CBRE UK Limited

Enclosures

Enclosure 1: RICS BCIS Data Report Sheets

BCIS®

£/M2 STUDY

Description: Rate per m2 gross internal floor area for the building Cost including prelims.

Last updated: 24-Aug-2024 07:26

Rebased to Harborough (105; sample 4)

MAXIMUM AGE OF RESULTS: 5 YEARS

Building function (Maximum age of projects)	£/m² gross internal floor area						Sample	
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest		
New build								
810.1 Estate housing								
Generally (5)	1,698	827	1,433	1,677	1,869	3,574	221	
Single storey (5)	1,928	1,081	1,691	1,786	2,011	3,574	40	
2-storey (5)	1,649	827	1,424	1,611	1,804	2,743	176	
3-storey (5)	1,565	1,194	1,309	1,582	1,761	1,980	5	
810.12 Estate housing semi detached								
Generally (5)	1,788	1,015	1,507	1,757	1,971	3,574	60	
Single storey (5)	1,839	1,320	1,625	1,797	1,965	3,574	20	
2-storey (5)	1,757	1,015	1,453	1,747	1,990	2,743	39	
3-storey (5)	1,980	-	-	-	-	-	1	
810.13 Estate housing terraced								
Generally (5)	1,512	952	1,321	1,449	1,704	2,195	10	
Single storey (5)	1,532	-	-	-	-	-	1	
2-storey (5)	1,550	952	1,354	1,449	1,801	2,195	8	
3-storey (5)	1,194	-	-	-	-	-	1	

Building function (Maximum age of projects)	£/m² gross internal floor area						Sample	
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest		
816. Flats (apartments)								
Generally (5)	1,966	999	1,612	1,822	2,231	3,924	168	
1-2 storey (5)	1,917	1,093	1,493	1,714	2,327	3,583	31	
3-5 storey (5)	1,970	999	1,619	1,824	2,222	3,924	115	
6 storey or above (5)	2,016	1,387	1,639	1,939	2,310	2,771	22	

BCIS®

£/M2 STUDY

Description: Rate per m2 gross internal floor area for the building Cost including prelims.

Last updated: 24-Aug-2024 07:26

Rebased to Leicestershire and Rutland (101; sample 110)

MAXIMUM AGE OF RESULTS: 5 YEARS

Building function (Maximum age of projects)	£/m² gross internal floor area						Sample	
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest		
New build								
810.1 Estate housing								
Generally (5)	1,634	796	1,378	1,613	1,798	3,437	221	
Single storey (5)	1,854	1,039	1,626	1,718	1,935	3,437	40	
2-storey (5)	1,587	796	1,369	1,549	1,735	2,639	176	
3-storey (5)	1,505	1,148	1,259	1,522	1,694	1,904	5	
810.12 Estate housing semi detached								
Generally (5)	1,720	976	1,450	1,690	1,896	3,437	60	
Single storey (5)	1,769	1,269	1,563	1,729	1,890	3,437	20	
2-storey (5)	1,690	976	1,398	1,680	1,914	2,639	39	
3-storey (5)	1,904	-	-	-	-	-	1	
810.13 Estate housing terraced								
Generally (5)	1,455	915	1,270	1,394	1,639	2,111	10	
Single storey (5)	1,473	-	-	-	-	-	1	
2-storey (5)	1,491	915	1,302	1,394	1,732	2,111	8	
3-storey (5)	1,148	-	-	-	-	-	1	

Building function (Maximum age of projects)	£/m² gross internal floor area						Sample	
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest		
816. Flats (apartments)								
Generally (5)	1,891	961	1,550	1,753	2,146	3,775	168	
1-2 storey (5)	1,844	1,051	1,437	1,649	2,238	3,446	31	
3-5 storey (5)	1,895	961	1,557	1,755	2,137	3,775	115	
6 storey or above (5)	1,940	1,334	1,577	1,865	2,222	2,665	22	

BCIS All-in TPI #101
BCIS All-in TPI

Base date:
1985 mean = 100
Updated:
14-Jun-2024
Series no.
#101

			Percentage change		
Date	**Index**	**Equivalent sample**	**On year**	**On quarter**	**On month**
1Q 2019	331	74	1.5%	0.3%	
2Q 2019	335	66	2.8%	1.2%	
3Q 2019	335	62	2.4%	0.0%	
4Q 2019	333	56	0.9%	-0.6%	
1Q 2020	335	Provisional	1.2%	0.6%	
2Q 2020	335	Provisional	0.0%	0.0%	
3Q 2020	330	Provisional	-1.5%	-1.5%	
4Q 2020	328	Provisional	-1.5%	-0.6%	
1Q 2021	328	Provisional	-2.1%	0.0%	
2Q 2021	331	Provisional	-1.2%	0.9%	
3Q 2021	339	Provisional	2.7%	2.4%	
4Q 2021	344	Provisional	4.9%	1.5%	
1Q 2022	349	Provisional	6.4%	1.5%	
2Q 2022	365	Provisional	10.3%	4.6%	
3Q 2022	371	Provisional	9.4%	1.6%	
4Q 2022	375	Provisional	9.0%	1.1%	
1Q 2023	379	Provisional	8.6%	1.1%	
2Q 2023	383	Provisional	4.9%	1.1%	
3Q 2023	386	Provisional	4.0%	0.8%	
4Q 2023	388	Provisional	3.5%	0.5%	

BCIS®

Base date:
1985 mean = 100
Updated:
14-Jun-2024
Series no.
#101

			Percentage change		
Date	**Index**	**Equivalent sample**	**On year**	**On quarter**	**On month**
1Q 2024	390	Provisional	2.9%	0.5%	
2Q 2024	392	Provisional	2.3%	0.5%	
3Q 2024	394	Forecast	2.1%	0.5%	

Enclosure 2: RICS BCIS Data Report Sheets

BCIS®

£/M2 STUDY

Description: Rate per m2 gross internal floor area for the building Cost including prelims.

Last updated: 05-Apr-2025 07:45

Rebased to Leicestershire and Rutland (101; sample 110)

MAXIMUM AGE OF RESULTS: 5 YEARS

Building function (Maximum age of projects)	£/m² gross internal floor area						Sample	
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest		
New build								
810. Housing, mixed developments (5)	1,740	848	1,502	1,689	1,910	3,972	310	
810.1 Estate housing								
Generally (5)	1,714	810	1,429	1,703	1,907	3,464	195	
Single storey (5)	2,000	1,348	1,700	1,838	2,186	3,464	33	
2-storey (5)	1,660	810	1,411	1,649	1,855	2,659	158	
3-storey (5)	1,529	1,157	-	1,501	-	1,957	4	
810.12 Estate housing semi detached								
Generally (5)	1,850	1,111	1,605	1,766	1,968	3,464	51	
Single storey (5)	1,955	1,348	1,699	1,868	1,953	3,464	18	
2-storey (5)	1,787	1,111	1,433	1,729	2,010	2,659	32	
3-storey (5)	1,957	-	-	-	-	-	1	
810.13 Estate housing terraced								
Generally (5)	1,486	923	1,328	1,409	1,708	2,149	9	
2-storey (5)	1,527	923	1,380	1,426	1,746	2,149	8	
3-storey (5)	1,157	-	-	-	-	-	1	

BCIS®

Building function (Maximum age of projects)	£/m² gross internal floor area						Sample	
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest		
816. Flats (apartments)								
Generally (5)	1,948	969	1,577	1,825	2,223	3,804	157	
1-2 storey (5)	1,908	1,070	1,455	1,678	2,375	3,528	31	
3-5 storey (5)	1,947	969	1,579	1,830	2,191	3,804	112	
6 storey or above (5)	2,038	1,500	1,648	1,879	2,449	3,010	14	

Appendix 6: Updated Transport Assessment (2025)

Land South of Gartree Road

Regulation 19 Representation - Transport

Urban&Civic

Prepared by:

SLR Consulting Limited

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SLR Project No.: 403.065817.00001

Client Reference No: 139721

1 May 2025

Revision: 2

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
1	31 March 2025	DM	JM	JM
2	1 May 2025	DM	JM	JM

Basis of Report

This document has been prepared by SLR Consulting Limited (SLR) with reasonable skill, care and diligence, and taking account of the timescales and resources devoted to it by agreement with Urban&Civic (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

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Appendices

1.0 Introduction

Background and Context

1.1 Urban&Civic and Homes England are promoting a parcel of land between the A6 and Gartree Road for a residential led development of approximately 4,000 homes, associated on-site amenities and social and educational infrastructure. The Site is referred to in this report as 'Land South of Gartree Road [LSGR]', with the majority of it located within the administrative area of Harborough District Council [HDC] and the northwest corner being located within the administrative area of Oadby and Wigston Borough Council [OWBC].

1.2 In the context of the development being promoted at LSGR, SLR Consulting Limited [SLR] has been appointed by Urban&Civic (and on behalf of Homes England) to undertake a review of the transport evidence base produced for the HDC Local Plan, which was issued for consultation on the 10th March 2025 under Regulation 19 of the Local Plan preparation process. This Technical Note also incorporates a review of a wider body of work that has been undertaken for Leicestershire County Council [LCC], which has considered growth across a number of South Leicestershire District Local Plans; this includes the emerging Oadby and Wigston and Harborough Local Plans. LCC act as the Local Highway Authority [LHA] for these areas, and has issued its own consultation response to the HDC transport evidence base on the 10th March 2025.

1.3 SLR's review has sought to consider whether the transport work undertaken by LCC and HDC is in line with the latest Government guidance (as set out in **Section 2.0** and **Appendix A**) and underpinned with an ethos of "vision-led" planning (the basis on which Urban&Civic and Homes England seek to bring forward the development proposal at LSGR on), or whether it has been focused on the now discredited and abandoned (except in particular circumstances) "Predict and Provide" approach which places highway mitigation, road capacity and the convenience of car drivers above all else.

1.4 SLR's review of the suitability of the transport approach has been formed through a review of the following documents:

- South Leicestershire Joint Transport Evidence [SLJTE] Stage 1, prepared by AECOM, dated January 2025; and
- Harborough Local Plan – Strategic Transport Impact Assessment [STIA] (January 2025), including the Development Allocation Transport Assessment, Site 8631 (Land south of Gartree Road and east of Oadby), dated November 2024.

LCC Engagement and Work to Date

1.5 It should be noted that SLR, Urban&Civic and Homes England have been in active engagement with LCC as the LHA throughout the Regulation 19 process. These discussions have been extremely positive and constructive with a view to arriving at the Examination stage of the Local Plan, whereby all parties are agreed in principle that the LSGR site can be delivered in transport and highways terms.

1.6 All parties have of course noted that further detailed assessments and analysis will be required to support a future planning application, and to "fine tune" the transport strategy to support the delivery of the LSGR site. Notwithstanding this, SLR has undertaken a considerable amount of work throughout the Regulation 18 and 19 Local Plan processes, and have presented a comprehensive evidence base to LCC, HDC and OWBC already (which is beyond the level of detail which would be expected at this Local Plan stage). This has been well received by the three respective authorities, and discussions are underway with LCC to agree a suitable modelling strategy to consider the

transport effects of the LSGR development utilising LCC's Pan Regional Transport Model [PRTM] as appropriate.

Technical Note Structure

1.7 Following this introduction, this Technical Note is structured as follows:

- Section Two (and **Appendix A**) provides an outline of vision-led planning from a transport perspective; how SLR approach this; and also the policy, research and guidance framework within which this sits;
- Section Three provides a summary of the HDC Local Plan transport evidence base, including the wider SLJTE work;
- Section Four provides SLR's response to this evidence base and the points that SLR consider require discussing further for future analysis of the transport impacts of a development at LSGR;
- Section Five summarises the LCC consultation response to the HDC Local Plan transport evidence base, and provides some commentary from SLR on this response; and
- Section Six provides a summary of this Technical Note, together with suggested next steps.

2.0 A Vision Led Approach

Introduction

2.1 The SLR report 'Land South of Gartree Road Transport Vision', which was submitted at the Regulation 18 consultation stage in July 2024 together with the i-Transport reports 'Sustainable Transport Strategy' and 'Sustainable Transport Strategy Technical Evidence', set out detailed contextual and implementation information relating to the Vision and Validate (or vision-led planning) approach. The principles of this has been updated and is set out briefly in this section to set the scene for SLR's review of the transport evidence base.

2.2 Importantly, there is a substantial body of policy documents and guidance notes that support vision-led planning, and a review of these is set out in **Appendix A** for information.

2.3 It should be highlighted here, however, that since the submission of the report for the Regulation 18 consultation, the reforms introduced to the revised National Planning Policy Framework [NPPF] in December 2024 endorses the "vision-led" approach to transport planning. Further details of this are set out in **Appendix A**.

What is Vision-led Planning?

2.4 Vision-led planning is a method which sets the desired outcomes of a new development, then identifies placemaking and mobility interventions to realise those outcomes. This is opposed to predicting future demand to provide capacity (often known as predict and provide).

2.5 The objective is to deliver well-designed, sustainable and popular places. This approach is a requirement of the NPPF which was revised on the 12th December 2024 following a consultation process (see further details in **Appendix A**).

2.6 The vision for a site is a set of agreed outcomes for a development which form the basis of the masterplan design.

SLR's Approach to Vision-led Planning

2.7 SLR's approach to vision-led planning is to work collaboratively with residents, local planning authorities and developers in delivering the outcomes of climate-driven, healthy, accessible and inclusive places. These parameters are outlined further below and illustrated in **Figure 2-1**:

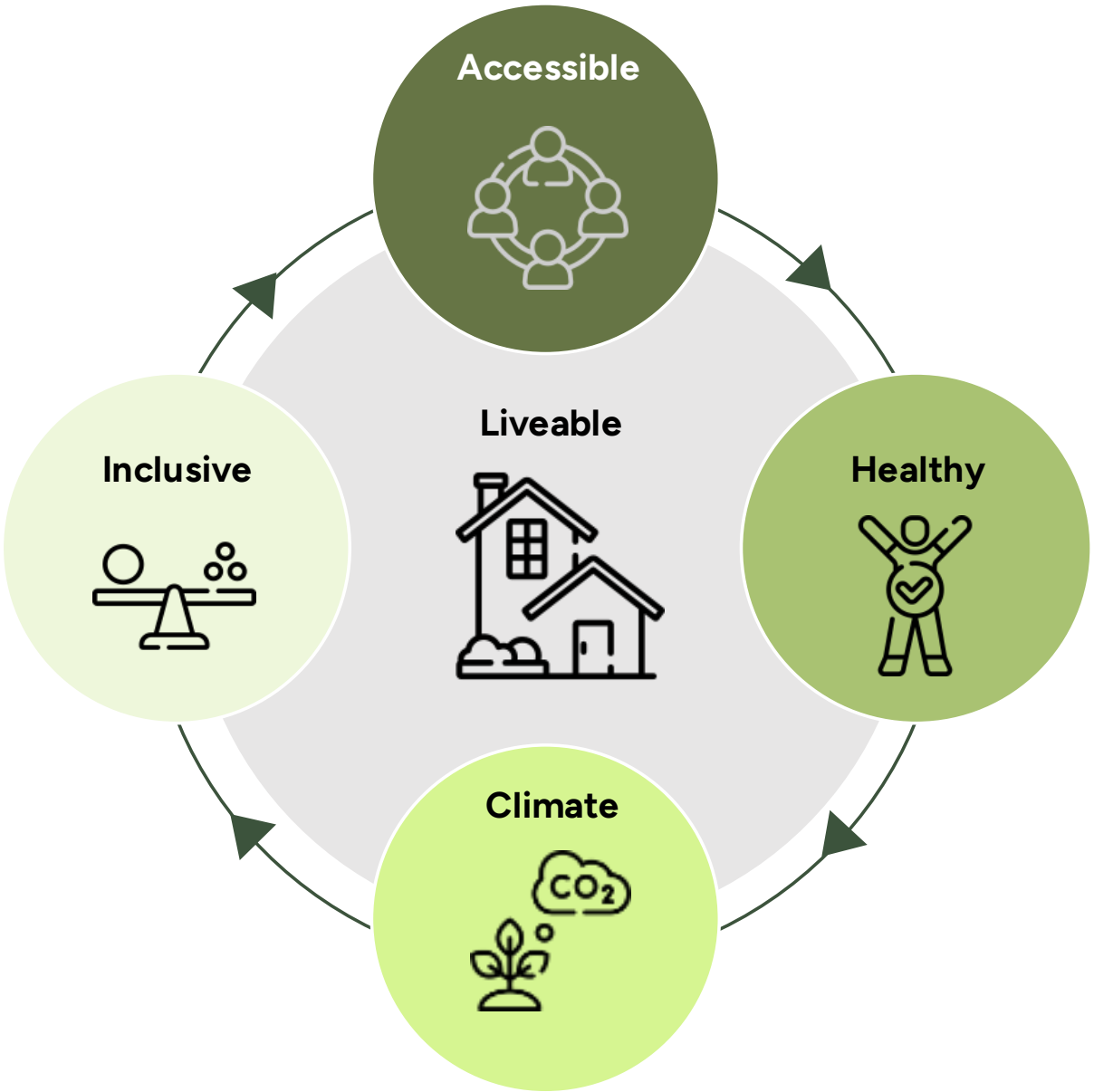
- Climate-driven;
  - Reduce car dependency;
  - Limits carbon emissions;
  - Air quality;
  - Biodiversity; and
  - Resilience.
- Healthy;
  - Physical health gains; and
  - Mental health gains.
- Accessible;

- On-site amenities within a short walk, cycle or public transport journey;
- Attractive walking and cycling infrastructure;
- Genuine alternative mobility options;
- Safe streets; and
- Thriving local businesses.

- Inclusive;
  - Designed for all people; and
  - Vibrant communities.

2.8 The realisation of the vision's outcomes is of greater importance than minimising traffic inconvenience on the road network; this is the fundamental principle of a Vision-led approach compared to Predict and Provide.

Figure 2-1 SLR's Approach to Vision-led Planning



2.9 By shifting the emphasis away from designing places for a 'worst case' peak hour scenario, we can realise the full potential of the development. This also allows us to better accommodate wider trends, new technologies and future-proofing to ensure such developments remain desirable in the years to come.

2.10 This is achieved through the provision of bespoke interventions across two categories within the masterplan:

- Placemaking; and
- Mobility.

Placemaking

2.11 The placemaking components of a visionary masterplan offer residents the freedom to fulfil many daily activities from within their community either physically or remotely. This can be made possible by bringing more trips within a short walking distance through the provision of amenities that enable local living. This reduces the private vehicle movements, promotes active travel, improves physical and mental health, enhances road safety, mitigates carbon emissions and creates vibrant communities and local businesses. Core placemaking interventions (where appropriate to the scale, setting and location of the site) include:

- 15-minute neighbourhood planning principles, enabling local living, where numerous services are within a short walk or cycle;
- Safe and attractive street design with green spaces welcoming pedestrians, cyclists, wheelchair users and pushchairs;
- Local retail, café and leisure facilities, and shared community spaces;
- Local employment opportunities;
- Enabling 'third place' working through co-working spaces; and
- Local primary and secondary schools.

Mobility

2.12 The second set of masterplan interventions relate to mobility. This aims to limit private car journeys for off-site movement by offering a genuine range of shared, on-demand and low carbon alternatives for residents, workers, and visitors. The aim is to make sustainable mobility behaviour the natural first choice for as many journey types as possible. For remaining trips where a shift away from private car is not possible, there is a need to provide EV chargers to reduce emissions from those car journeys. Core mobility interventions (where appropriate to the scale, setting and location of the site) include:

- Active travel corridors making walking, cycling, eScooters and eBikes the preferred way to get around and to connect to onward destinations;
- Shared micro mobility services (Bike, E-bike, E-scooter, E-cargo bike);
- Digital Demand Responsive Transport (DDRT) service offering convenient on-demand pickups from the site onto numerous destinations;
- Automated vehicle shuttles connecting with nearby transport hubs;
- Modern bus services;
- Residential EV Charging;
- EV car club and real time app-based carpooling;

- Digital platforms (Mobility as a Service) that bring these services together offering incentives; and
- Mobility hubs providing organised access to the various micro-mobility and other shared mobility services.

Summary

2.13 In summary, the current policy framework together with a range of research papers, strongly supports the vision-led approach to spatial and transport planning and is expected to do so even more in the future as net zero targets come into focus.

3.0 The HDC Local Plan Approach

Introduction

3.1 Taking the overview set out in **Section 2.0** and **Appendix A** into account, it is imperative that Local Plans provide a sound and supportive framework for which development can be brought forward in line with the principles of a vision-led approach. Whilst site specific masterplans and mobility strategies will of course be developed at a later stage when individual sites come forward through a planning application, the Local Plan can set the tone and the basis on which to plan for this forward thinking approach.

3.2 Rather than simply trying to predict the vehicle trip demands associated with development and trying to make this "fit" with the local highway network (i.e. by simply providing more highway capacity to cater for cars), a Local Plan should set the vision for how the same level of development can be facilitated sustainably without a "highway mitigation first" mind-set, unless of course the additional highways improvements are to increase bus accessibility at junctions, cycle and walking capacity. Indeed, this approach is now directly referenced and endorsed in the Department for Transport's Decarbonising Transport plan, published in July 2021 and the latest version of the NPPF (December 2024).

Summary of Evidence Base

3.3 A summary of the key points related to the assessment of highway impact in the SLJTE Stage 1 report and the Harborough Local Plan STIA is set out below. These identify discussion points that should be considered further in the context of the proposed development at LSGR, and which are covered in more detail in **Section 4.0.**

South Leicestershire Joint Transport Evidence Stage 1

3.4 Firstly, SLR would like to highlight that Urban&Civic and Homes England welcome the following conclusion drawn in the SLJTE Stage 1 report:

"Our initial view from a high-level assessment of forecast modelling suggests that the issues created by the following sites are of a scale that could be mitigated"

3.5 This provides confidence that SLR's forecast trip generation for the site based on a vison-led approach, which is significantly less than the assessment within the SLJTE and STIA work (as set out in **Section 4.0, Discussion Point 3),** could be suitably mitigated and that the LSGR site can be delivered as a sustainable new community based around local living.

Methodology

3.6 The SLJTE Stage 1 transport evidence base report prepared by AECOM, with the modelling of three spatial growth options associated with the combined development strategies across each South Leicestershire district (Blaby, Harborough, Hinckley and Bosworth, and Oadby and Wigston), has been undertaken using LCC's PRTM. The report is for Stage 1 - a combined assessment of a range of alternative development strategy options for the four emerging Local Plans in assessment years of 2041 and 2051, against a core scenario (without local plan growth).

3.7 The modelling is based on an assessment of highway impact during the peak hours on the highway network, with outputs of Volume over Capacity (VoC), increase in vehicle movements, and delay, and identifies potential highway improvement schemes to mitigate impacts. Whilst SLR do of course

recognise and note the role that the PRTM has to play at the Local Plan stage (which is to provide a high level strategic view on Local Plan Growth), it's application at this stage is still essentially a 'predict and provide' approach and further work will be required to consider transport effects based on the current strategies promoted by central and local government (as noted in **Section 2.0** and **Appendix A**). This is discussed further at **Discussion Point 1** in **Section 4.0.**

3.8 The base year used for the PRTM is 2019 (noting the base year for the PTRM has now been updated to 2023 for future impact analysis), which is not representative of post Covid-19 travel characteristics. This is discussed further at **Discussion Point 2** in **Section 4.0.**

Identified Traffic Impacts

3.9 The key issues identified for Impact Area D (South and East of Leicester Urban Area), which LSGR is located in, are:

- Orbital Traffic to Access the Strategic Road Network [SRN] adding pressure to the already congested routes in and around the Leicester Urban Area, leading to delays and bottlenecks, especially during peak times; and
- Radial Traffic Aiming to Access the City: The high volume of traffic on these radial routes (A6 and A1599) exacerbates congestion, causing significant delays and reducing the efficiency of the road network.

3.10 The key impacts identified (of most relevance to LSGR) are:

- Increase in VoC of more than 10% and over 85% on a number of junctions along the A6 corridor including at Florence Wragg Way, Woodside Road, Mere Lane and Gorse Lane and others towards Leicester;
- Increase in VoC of more than 10%, and over 100%, at the A6 / B582 junction;
- Increase in VoC of more than 10%, and over 85%, on a number of junctions on the B582; and
- Increase of >200 vehicle movements (SLR assumes this to be in one hour) on the A6 and Gartree Road.

3.11 The identified impacts above are based on generic residential and employment trip rates in the PRTM and do not take into account a number of factors regarding a proposed vision-led development at the LSGR site (on-site amenities, two primary schools and a secondary school and the associated internalisation of trips, and the implementation of a mobility strategy). This is discussed further at **Discussion Point 3** in **Section 4.0.**

Mitigation

3.12 The report identifies strategic mitigation for each sub area; however, the modelling of any mitigation has not been undertaken and therefore there is no evidence of the outcomes of such mitigation measures – we understand this would be undertaken at Stage 3 (a more detailed evidence base covering the key sub-areas of impact identified through Stage 2 (which is the assessment of the preferred development strategy for each district), including the development / assessment of mitigation packages for each sub-area).

3.13 For Area D (South and East of Leicester Urban Area), which LSGR is located in, the following is identified:

<u>Short term and throughout the Local Plan period</u>

- Local Cycling and Walking Infrastructure Plan - active travel package;

- Mobility hubs to be established at key arterial rail stations (and potentially key bus stations) near major developments; and
- Area-wide package of local highway improvements including traffic calming to prevent rat-running.

Throughout the Local Plan Period

- Major alteration to the local bus network including less fragmented bus priority measures on the A6; and
- Additional P&R hubs on the edge of the Leicester Urban Area.

Long term

- Major new local highway link(s) including the A563 Leicester Outer Ring Road Extension, a new M1 Junction 20a and potential new South and East Leicester Orbital Route from J20a to A46, which is most relevant to LSGR.

3.14 The points for discussion associated with the mitigation that has been identified are referred to in relation to the specific proposals for the LSGR site, set out in the Harborough Local Plan STIA below.

Harborough Local Plan – Strategic Transport Impact Assessment

Methodology

3.15 The Harborough Local Plan STIA, which is based on the Stage 2 PRTM outputs (a combined assessment of the preferred development strategies, determined by the District and Borough councils, to identify key areas of cumulative impact and strategic mitigation requirements) considers:

"the impact of the proposed site access points, issues associated with road safety and sustainable access (walking/cycling/public transport), and potential highway impacts (including anticipated junction capacity impacts). The STIA presents a series of measures that could be taken to facilitate development by maximising sustainable modes, and mitigate the impacts of the developments should they be progressed"

3.16 As with the modelling presented in the SLJTE, it is based on an assessment of highway impact during the peak hours on the highway network, which SLR would again highlight is essentially a 'predict and provide' approach at this stage. This is discussed further at **Discussion Point 1** in **Section 4.0.**

3.17 The base year used for the Stage 2 PRTM is also 2019 (noting the base year for the PTRM has now been updated to 2023 for future impact analysis), which is not representative of post Covid-19 travel characteristics, and is discussed further at **Discussion Point 2** in **Section 4.0.**

Sustainable Travel Measures

3.18 **Table 3-1** summarises the identified active travel, public transport and supporting measures and costs that are identified in the Harborough Local Plan STIA to facilitate the proposed development at LSGR.

Table 3-1: Suggested Site Facilitation Measures

Site Facilitation Measure Type	Measure	Indicative cost for LSGR
Walking and cycling (active travel)	• Cycle route upgrades (A6) • Cycle Signage (A6) • Upgraded cycle crossing (Florence Wragg Way / A6) • Strategic cycle route (Gartree Road)	£10,277,000
Public transport	• Increased bus service frequency • Bus service diversion • Bus Stop upgrades (Gorse Lane)	£1,077,000
Supporting schemes	• Behavioural change programmes	£140,000

3.19 A discussion regarding the active travel, public transport and supporting scheme measures and costs is provided at **Discussion Points 4, 5** and **6** in **Section 4.0.**

Identified Traffic Impacts

3.20 The modelling identifies the following categories of highway impact within the peak hours:

- Junctions experiencing a large worsening as likely 'Primary Impact' locations, as they more than likely will require mitigation; and
- Marginal changes in VoC performance (wherein the VoC ratio exceeds 85% - as potential 'Secondary Impact' locations.

3.21 Based on the above, 24 Primary Impact locations and seven Secondary Impact locations are identified, whereby a 'proportional impact' is identified that could be attributed to vehicle movements associated with the proposed development at LSGR.

3.22 Urban&Civic and Homes England acknowledges that there may be a need for some improvements to facilitate the vision for the proposed development, but do not agree with the extent of the identified highway impact locations set out in the Harborough Local Plan STIA. Also, these should be a 'last resort' and only considered should impacts remain following the inclusion and consideration of the benefits of sustainable travel interventions. A discussion regarding the identified impact locations is provided at **Discussion Point 7** in **Section 4.0.**

Highway Mitigation

3.23 Whilst the Harborough Local Plan STIA acknowledges that a vision-led approach will be required by developers for applications, the focus in the transport evidence is based on highway capacity and network performance in the peak hours and suggests this should be explored further in future planning applications for sites:

"Furthermore, it should be noted that any highway capacity improvements at such capacity constrained locations may not produce overall improvements in network performance, if they were to draw traffic away from less suitable routes and back onto more strategic routes. This should be

explored in more detail within the site specific Transport Assessment supporting individual planning applications."

3.24 The identified indicative mitigation schemes have been 'derived' at this stage (noting there are no design drawings and the schemes have not been tested) using the assessment of impacts that is not vision-led and against an unrealistic (and over-estimated) baseline. This is discussed further at **Discussion Point 7** and the associated indicative mitigation costs (estimated as £7,657,000 for LSGR) at **Discussion Point 8**, in **Section 4.0.**

Summary

3.25 The modelling work that has been undertaken and presented in the Harborough Local Plan STIA identifies potential cumulative impacts associated with the preferred Local Plan development strategy, with the proportions of those impacts attributed to the LSGR site, some identified potential mitigation and associated indicative costs.

3.26 Notwithstanding the discussion points set out below that have been identified in SLR's review of the transport evidence base work, and noting that a detailed assessment of the LSGR site would be required to support a future planning application, Urban&Civic and Homes England welcome the conclusion drawn in the SLJTE Stage 1 report as set out in **Paragraphs 3.4** and **3.5**.

3.27 Urban&Civic and Homes England will work closely with HDC, OWBC and LCC to consider the identified discussion points in the transport evidence base as the Local Plan moves forward to the Examination stage, and as the LSGR site moves forward to a planning application beyond this. As noted in the introduction of this report, those discussions are already actively underway and have been both positive and constructive.

3.28 In summary, SLR acknowledge that the assessment is high-level, is required to inform the Local Plan process and based on information available at the time of preparation, however the conclusions drawn should be treated with caution, based on a review of the following discussion points identified by SLR:

- Discussion Point 1: A General Predict and Provide Theme;
- Discussion Point 2: An Unrepresentative Baseline Position;
- Discussion Point 3: Overestimation of Trip Generation;
- Discussion Point 4: Active Travel Cost Estimates;
- Discussion Point 5: Public Transport Cost Estimates; and
- Discussion Point 6: Behavioural Change Programme Costs.
- Discussion Point 7: Impacts and Unnecessary Highway Mitigation; and
- Discussion Point 8: Highway Mitigation Costs;

4.0 Discussion Points Arising from the Transport Evidence Base

Discussion Point 1: A General Predict and Provide Theme

4.1 **Based on SLR's review of the transport evidence base documents, the overall approach undertaken at this stage is car and "highways led", with the general language used at the outset around vehicular capacity and connectivity constraints. It is a "Predict and Provide" high level approach that has been applied in the initial work, focused on highway operation in peak hours**.

4.2 SLR notes the HDC transport evidence in the Harborough Local Plan STIA is based on the use of LCC's PRTM and has been used by AECOM to forecast the demand from the proposed homes and jobs associated with the preferred development strategy for Harborough up to the year 2041, which is Stage 2 as set out in the SLJTE.

4.3 The PRTM is used to forecast changes in travel demand as a function of the new homes and jobs, together with assumed changes in congestion, fuel costs, public transport fares, highway infrastructure and public transport infrastructure / services. Whilst there is of course a place for such transport modelling at the plan making stage, the main point for discussion is that this body of work is not vision led.

4.4 Instead, and in high level terms, the modelling approach taken is:

a) Predicting a future travel demand associated with the new homes and jobs;

b) Reporting on the highway network performance associated with that as a baseline position; and

c) Identifying a list of measures to "mitigate" the impact of that demand, again reported from a network operation perspective and with a focus on peak hours (i.e. to the convenience of car drivers).

4.5 Whilst sustainable measures have been considered as interventions, this is all with a view to understanding and reporting on how the highway network will operate and function for car drivers as a result. Indeed, SLR would point out that even where schemes include measures to affect mode shift (but then provide highways capacity for the residual demand), this is actually still the Predict and Provide approach (which the NPPF has rejected).

4.6 Notwithstanding the above, it is noted that a vision-led approach is referred to in the Harborough Local Plan STIA where is states *"it is recognised that more work will be required for each site (within a site specific TA) to fully adopt a Vision Led approach through to the build-out phase."*, which is welcomed by Urban&Civic and Homes England.

4.7 However, SLR would suggest that the requirement of a "fallback" position with a package of highway mitigation measures if "Visions" for the Local Plan allocation sites are not achieved is not within the ethos of vision-led planning. This is covered further under **Discussion Points 7** and **8** later on in this report.

Discussion Point 2: An Unrepresentative Baseline Position

4.8 **The work undertaken by AECOM uses the PRTM with 2019 baseline traffic flows, which pre-dates the Covid-19 pandemic and the associated changes in travel behaviours that have occurred since and is not therefore representative of current baseline traffic conditions. SLR is of the opinion,**

therefore, that the data is not wholly suitable for considering realistic impacts and infrastructure requirements associated with the Harborough Local Plan.

Analysis Methodology

4.9 The differences in baseline traffic flows on the highway network was evidenced in the SLR report 'Land South of Gartree Road Transport Vision' submitted at the Regulation 18 stage of the Local Plan consultation, using traffic data collected on the A6 and Gartree Road in May 2024 and comparing this to data collected in TAs prepared to support the following planning applications:

- Land at Cottage Farm, Oadby – Phase 2 (19/00356/OUT), which was approved on the 15th June 2021 (2015 and 2018 turning count traffic surveys on the A6); and
- Residential development at Stoughton Grange / Gartree Road, Oadby (18/00178/OUT), which was approved on the 15th October 2019 (2018 turning count traffic surveys and an ATC on Gartree Road).

4.10 Since the submission of the Regulation 18 representation, SLR has commissioned the following additional Automatic Traffic Count [ATC] and peak period junction turning count [JTC] surveys on the A6 and on Gartree Road by way of a further comparison to the 2015 and 2018 data referenced above:

- ATC on the A6 adjacent to Sainsbury's (November 2024);
- JTC at the A6 / B852 / Uplands Road junction (November 2024);
- JTC at the Gartree Road / Stoughton Road junction (November 2024);
- ATC on the A6 Leicester Road (March 2025);
- ATC on the A6 Harborough Road, south of the B582 (March 2025);
- ATC on the B582 Stoughton Road (March 2025);
- ATC on the B582 New Street (March 2025);
- ATC on the A6 Glen Road, north of the Glen Gorse Roundabout (March 2025);
- ATC on the A6 Leicester Road, south of the Glen Gorse Roundabout (March 2025); and
- ATC on the Gartree Road, east of Mere Road (March 2025).

4.11 A summary of the traffic flow differences at each of these locations on the A6 corridor (including the B582) and Gartree Road is set out in **Table 4-1** to **Table 4-8**. It should be noted that the comparison are based on two-way flows on a link or 'all movements' at a junction, which differs in some cases to the one-directional comparisons drawn in SLR's Regulation 18 'Land South of Gartree Road Transport Vision' report.

Table 4-1: A6 / B582 / Uplands Road JTC Comparison (October 2018 and November 2024)

Peak Period	Traffic Flow (PCUs)		Difference	
	October 2018	November 2024	PCUs	Percentage (%)
AM	3,149	2,863	-286	-9.0
PM	2,911	2,800	-111	-3.8

Table 4-2: A6 North of the B582 ATC Comparison (October 2018 and March 2025)

Peak Period	Traffic Flow (PCUs)		Difference	
	October 2018	March 2025	PCUs	Percentage (%)
AM	2,265	1,907	-358	-15.8
PM	2,018	1,901	-117	-5.8

Table 4-3: B582 Stoughton Road ATC Comparison (October 2018 and March 2025)

Peak Period	Traffic Flow (PCUs)		Difference	
	October 2018	March 2025	PCUs	Percentage (%)
AM	968	873	-96	-9.9
PM	896	903	6	+0.7

Table 4-4: B582 New Street ATC Comparison (October 2018 and March 2025)

Peak Period	Traffic Flow (PCUs)		Difference	
	October 2018	March 2025	PCUs	Percentage (%)
AM	691	634	-58	-8.3
PM	711	670	-41	-5.7

Table 4-5: A6 at Sainsburys ATC Comparison (February 2015, May 2024 and November 2024)

Peak Period	Traffic Flow (PCUs)			Difference (May 2024)		Difference (November 2024)	
	February 2015	May 2024	November 2024	PCUs	Percentage (%)	PCUs	Percentage (%)
AM	2,519	2,084	2,049	-435	-17.3	-470	-22.9
PM	2,373	2,169	2,020	-204	-8.6	-353	-17.5

Table 4-6: A6 North of Glen Gorse Roundabout ATC Comparison (October 2018 and March 2025)

Peak Period	Traffic Flow (PCUs)		Difference	
	October 2018	March 2025	PCUs	Percentage (%)
AM	2,333	2,118	-215	-9.2
PM	1,977	2,020	43	+2.2[1]

Table 4-7: A6 South of Glen Gorse Roundabout ATC Comparison (October 2018 and March 2025)

Peak Period	Traffic Flow (PCUs)		Difference	
	October 2018	March 2025	PCUs	Percentage (%)
AM	1,700	1,587	-113	-6.7
PM	1,408	1,355	-53	-3.8

Table 4-8: B582 Gartree Rd/Stoughton Rd JTC Comparison (September 2018 & November 2024)

Peak Period	Traffic Flow (PCUs)		Difference	
	September 2018	November 2024	PCUs	Percentage (%)
AM	1,813	1,782	-31	-1.7
PM	1,708	1,664	-44	-2.6

Summary

4.20 The data presented in **Table 4-1** to **Table 4-8** show that, with the exception of two very minor (0.7% and 2.2%) increases, traffic flows on the key roads in the vicinity of LSGR that would be used by vehicles associated with the proposed development are lower in 2024 / 2025 than 2015 or 2018. This includes the A6, the B582 (Gartree Road / Stoughton Road / New Street) and Gartree Road, with differences ranging as follows:

- A6 - between around 4 and 23% lower; and
- B582 / Gartree Road - between around 2 and 10% lower.

4.21 Also, given data have been collected at three different periods in 2024 and 2025, which all show lower traffic flows in the highway peak periods (directional, two-way on a link, or all movements at a

[1] The southeast bound traffic (the highest traffic flow in the evening peak) is lower in March 2025 compared to October 2018

junction) compared to the 2015 / 2018 survey data, this provides a strong argument of the changing travel behaviour as the comparison is not just based on a single day / period snapshot.

4.22 SLR acknowledges that there is often a lag for the update of strategic model baselines and is aware that the PRTM model now has a new baseline of 2023, which will be required to be utilised to assess the impact of a proposed development at the LSGR within a detailed TA to support a future planning application. However, given the noticeable changes in baseline traffic flows on the A6 and Gartree Road and the significant and continuing shift in travel behaviours, the work undertaken by AECOM using the 2019 base PRTM model is not representative of current baseline traffic conditions and therefore not wholly suitable for considering the 'realistic' impacts and infrastructure requirements associated with the Harborough Local Plan. SLR would note that this point is already being addressed and discussed directly with LCC, with further model runs to be undertaken based on the 2023 PRTM leading up to the Local Plan Examination.

Discussion Point 3: Overestimation of Trip Generation

4.23 **The forecast trip generation included in the modelling work for the Harborough Local Plan transport evidence base (and the SLJTE) for the proposed development at LSGR is significantly over estimated.**

4.24 Based on SLR's review in the 'Land South of Gartree Road Transport Vision' report submitted for the Regulation 18 consultation, the vision-led forecast vehicle movements are up to **44% lower** than the peak hour residential trips identified in the AECOM work. However, the forecast trip generation has since been developed by SLR further to take account of:

- 2023 National Travel Survey [NTS] data, which shows on average 15% less commuting trips, 10% less shopping trips and 30% less business trips compared to 2019 used for the Regulation 18 consultation. This reinforces the changing travel habits following the Covid-19 pandemic;
- The HDC Policy requirements for LSGR, which include an 8 Form Entry secondary school and post 16 provision on the LSGR site (this was assumed to be an extension to Manor High School in the submission at the Regulation 18 consultation); and
- The HDC Policy requirements for LSGR, which also now require 5 hectares of employment land (although it should be noted that there is no definition or detail yet agreed in terms of the type of employment that this may incorporate). This land use type was not accounted for in the submission at the Regulation 18 consultation, and for the purpose of this exercise the forecast trip generation has been taken from the Development Allocation Transport Assessment for LSGR in the Harborough Local Plan STIA (since discussions are ongoing regarding the specific form of this requirement). The trip generation associated with this employment land is, therefore, subject to change and SLR would develop its own site specific estimate of this in due course.

4.25 Based on the above, our forecasts now suggest the trip generation difference could be up to around **54% lower** than the peak hour vehicle movements identified in the AECOM work. A detailed breakdown of this analysis, which is derived from the SLR vision-led tool, is provided in **Appendix B** of this Technical Note. This is summarised in **Table 4-9.**

4.26 For clarity and the avoidance of doubt, it should be noted that the numbers presented in **Table 4-9** differ to the trip generation outputs presented in **Appendix B** only due to the fact that vehicle movements assumed for the 5 hectares of employment land have been manually added (as stated above using the AECOM assumptions). Once the composition of the employment land has been further discussed and agreed with HDC and OWBC, this will be incorporated into SLR's Vision-led Planning Tool for analysis as the Local Plan moves towards examination and to support a future planning application.

Table 4-9: Summary of Trip Forecasting Comparison with AECOM Analysis (Two-Way)

Peak Period	Traffic Flow (Vehicles)		Difference	
	AECOM	SLR	Vehicles	Percentage (%)
AM	2,276	1,105	-1,171	-51.4
PM	2,263	1,048	-1,215	-53.7

4.28 The reasons for the significant overall differences in trip forecasting between the AECOM work and SLR's Vision-led Planning Tool approach are as follows:

- The SLJTE Stage 1 modelling work uses indicative trip rates for the proposed residential and employment uses at the LSGR site (also these are applied to all large Local Plan developments), which are not specific to the site locality;
- The SLJTE Stage 1 modelling work does not account for the provision of schools or local amenities on-site, which are proposed at LSGR and would assist in internalising vehicle movements;
- The SLJTE Stage 1 modelling work does not account for societal and behavioural changes expected in the future (i.e. lower car ownership and fewer people having driving licenses; continuing increases in home shopping; and continuing increases in working from home); and
- The SLJTE Stage 1 modelling work does not allow for any mobility strategy that would be implemented.

4.29 SLR acknowledges, however, that the report states the trip rates may be subject to refinement at the stage of preparing a detailed TA.

4.30 A vision-led approach (whereby placemaking within the LSGR site would maximise the potential for internalised trip making and the embedded mobility strategy would maximise the opportunity for sustainable external trip-making to and from the LSGR site), would ultimately be promoted by Urban&Civic and Homes England. With this in mind, the morning and evening external peak hour trip generation would therefore be expected to be much less than the trip generation identified in the AECOM modelling, and this provides an even greater level of certainty of the conclusion drawn in the SLJTE Stage 1 Report that the modelling suggests the issues created by Local Plan sites are of a scale that could be mitigated. This is particularly the case, given that SLR would expect other strategic sites in the Local Plan to also be associated with significantly less vehicle trips than those currently accounted for in the PRTM modelling work.

4.31 Whilst noting that the trip generation impacts that form the Local Plan transport evidence base are based on available data at the time and a series of assumptions regarding the proposed development at LSGR, they do represent a worst-case scenario and are overestimated; as such, they should be treated with caution at this stage. Urban&Civic and Homes England will work closely with LCC, HDC and OWBC to develop the vision for the LSGR site, based on the vison-led approach as the site moves forward to the Local Plan examination and a planning application. As previously discussed, positive and constructive discussions with each of these authorities are already underway with a view to developing this agreed strategy.

Discussion Point 4: Active Travel Cost Estimates

4.32 **Based on high-level, initial costings, the estimation within the Harborough Local Plan STIA appears sensible but would be subject to detailed design and final agreement.**

4.33 The approach for active travel modes, set out in the Sustainable Transport Strategy (STS) prepared for the LSGR site at the Regulation 18 stage, is focussed on providing key strategic pedestrian/cycle links from the site/local area towards Leicester city. This is in combination with enhancing connections to Oadby by improving the local public rights of way routing from the western border of the site. This strategy would deliver significant active travel infrastructure improvements in the local area comprising:

- A new footway/cycleway along Gartree Road between the westernmost site access and the B582 / Stoughton Road junction;
- Improvements to the shared footway/cycleway along the A6, with potentially segregating the cycleway where sufficient highway land is available; and
- Enhancements to local public footpaths and bridleways to make them accessible to all users.

4.34 This would provide the cycling infrastructure along the A6 and Gartree Road suggested by HDC plus additional off-site pedestrian infrastructure improvements. Notwithstanding this, the specific details of an active travel strategy for LSGR will be discussed and agreed through engagement with HDC, OWBC and LCC through the preparation of a future planning application.

Discussion Point 5: Public Transport Cost Estimates

4.35 **The costs for much of the above will be internal to the proposed development at LSGR. Any additional financial contributions to existing bus service frequency improvements would be subject to further scrutiny and agreement at the planning stage, based on a detailed Transport Assessment.**

4.36 Based on the location of the LSGR site, the majority of future residents are expected to travel to Leicester city centre and other parts of Leicester (dependent on journey purpose) rather than towards Market Harborough. The STS submitted as part of the Regulation 18 consultation proposed a comprehensive Bus/Mobility Strategy including a new bus route between Great Glen and Leicester city, routing through the LSGR site between London Road and Gartree Road. This proposition was informed by discussions with local bus operators and was considered to be the most appropriate intervention to significantly improve the public transport provision in the local area. In addition, a new high-quality bus interchange is proposed to improve access to existing bus services to Market Harborough and other destinations to the southeast (i.e. X3 and X7 services). The bus interchange is to include a primary mobility hub at the southern frontage of the site to facilitate access to other sustainable travel modes, whilst secondary and tertiary mobility hubs would also be strategically placed throughout the LSGR site to promote sustainable travel in line with the site's vision.

Discussion Point 6: Behavioural Change Programme Costs

4.37 **Appropriate travel plan monitoring fees are expected, though they will require confirmation once detailed plans have been progressed.**

4.38 The Behavioural Change Programme costs are associated with on-going monitoring of travel plans. A site-wide travel plan would be supported to help promote the active travel and public transport enhancements delivered as part of the STS.

Discussion Point 7: Unnecessary Highway Mitigation

4.39 **SLR does not agree with the scale and locations for the highway mitigation measures referenced in the transport evidence base, and would state that conclusions on this cannot yet be reached based on strategic modelling that is overestimating the baseline operation and proposed development trips. Furthermore, any highway mitigation measures will be influenced by the nature of the spine road through the LSGR site; the vision by Urban&Civic and Homes England is for the spine road to not cater for through traffic, however it is noted that the PRTM modelling to date includes this as a through route. SLR is undertaking positive and constructive ongoing discussions with LCC regarding the need, or otherwise, for the spine road to cater for through-traffic, and this will be subject to traffic modelling via an agreed approach with LCC.**

Increasing Highway Capacity as a Last Resort

4.40 Whilst SLR acknowledge that the evidence base is required to identify potential infrastructure requirements to deliver the sites included within the Local Plan and highway improvements may, in some cases, be required in addition to active travel and public transport improvements; highway mitigation measures should still be a last resort, which is an approach now being adopted by other local authorities to ensure that developments are brought forward in line with a vison-led approach.

4.41 One example to draw upon as a precedent is Somerset Council which, in 2023, published a set of principles to inform the development of its new Local Plan, new Local Transport Plan and overall approach to transport planning. The Transport and Policy Principles are intended to: "*achieve a vision-led approach to planning and … create better places, reduce transport carbon emissions and include a move away from increasing highway capacity or private cars which until recently has been the focus of much of our transport planning activity*"[2]. This approach is intended to enable the aims of the council's climate emergency declaration.

4.42 The principles, which have been provided by its Executive in July 2023, seek to ensure that there is a consistent approach by the Local Planning Authority and the Local Highway Authority regarding development proposals and their implementation. They will also help to accommodate new Quantified Carbon Reduction targets likely to feature in the new LTP guidance from the DfT.

4.43 Some of the key principles which the Executive has agreed to adopt are worth specifically highlighting as follows (where bold emphasis is shown, note this has been applied by SLR for the purpose of this report)[3]:

> "*a. Reducing carbon emissions will be the key priority for the transport and development plans including the adoption of a transport decarbonisation pathway…..*
>
> *c.* ***We will adopt a vision-led 'decide and provide' or 'vision and validate' approach to new development whereby a strong vision for great places to live with a reduced need to travel is agreed****. This will involve co-locating housing and other facilities to create neighbourhoods where the natural first choice is to walk or cycle to access work, education, learning and healthcare etc.*
>
> *d. We will endorse the vision led approach to street and highway design as part of wider high quality placemaking and agree the vision and principles as set out in Appendix A for*

[2] https://democracy.somerset.gov.uk/documents/s10637/Item%207%20Transport%20and%20Planning%20Policy%20Guiding%20Principles.pdf

[3] https://democracy.somerset.gov.uk/documents/s10637/Item%207%20Transport%20and%20Planning%20Policy%20Guiding%20Principles.pdf, pages 11 and 12.

consultation with key stakeholders. Having taken into account comments received authority is given to the Service Directors in conjunction with the Executive Lead Members to adopt the vision and principles as a material planning consideration for the preparation of masterplans, pre-application advice, assessing planning applications and any other development management purposes.

e. *Subject to detailed analysis,* ***priority policy interventions will be related to reducing the need to travel and promoting sustainable travel*** *(active travel for shorter distances, e-bikes and micromobility for slightly longer distances, shared transport, bus, demand responsive transport, and rail for longer distances; and policy interventions such as parking management that aim to reduce demand for travel by private car).*

f. ***We will expect developers to provide high quality active travel and public transport networks within and accessing new development areas****, to ensure new development does not create significant additional congestion,* ***rather than creating additional highway capacity for private car traffic****. We will expect developers to implement high-quality sustainable travel plans which include a wide range of measures and incentives to enable active travel.*

g. ***Increasing highway capacity will only be considered as a last resort and in exceptional circumstances****. We will continue to complete highway capacity improvements that are already in the pipeline as funded schemes but* ***it is likely that we will not be seeking Government funding for improvements that increase capacity for private car travel beyond the current pipeline****."*

4.44 As can be seen from the above, therefore, the leadership of this local authority has made a clear endorsement of a vision led approach to frame development coming forward through its future Local Plan. It is prioritising placemaking and sustainability mobility as a principal component of how sites should come forward within the framework of its emerging Local Plan and Local Transport Plan and is (boldly) abandoning the idea of increasing highway capacity to cater for private car traffic growth.

Impact Locations

4.45 As set out in **Paragraph 3.21**, the Harborough Local Plan STIA identifies 24 Primary Impact locations, and some of these are locations which are identified as already having existing capacity issues (albeit noting this is based on baseline traffic flows prior to the Covid-19 pandemic).

4.46 Eight of the Primary Impact locations are located in, and in the vicinity of, Lutterworth, which are around 16 to 20 miles from LSGR. The Harborough Local Plan STIA does not state the number of vehicle movements associated with LSGR (or other sites) forecast at each junction; however, taking the likely trip generation associated with a vision-led approach, we would not expect there to be any impacts that would require mitigation associated with a proposed development at LSGR at a junction at that distance from the site. This is particularly the case given the principles of the vison-led approach, which not focus on the network peak hours in the planning balance and should consider highway mitigation as last resort only.

Fallback Position Not in Line with the Vision-Led Approach

4.47 SLR would suggest that the requirement of a "fallback" position with a package of highway mitigation measures if "Visions" for the Local Plan allocation sites are not achieved is not within the ethos of vision-led planning. As set out above, highway mitigation schemes to improve capacity should be a last resort and only if there is significant impacts across a large proportion of the day. Therefore, unless the ultimate outcome of vehicle movements at LSGR result in this, we do not agree that there should be a fallback position for such highway capacity improvement schemes. However, we note the following comment in the Harborough Local Plan STIA:

"In the latter case (referring to the implementation of fallback highway mitigation*), a policy decision may be required by LCC/HDC to determine if the costs presented (subject to the caveats later in this report) are ultimately allocated to highway network improvements or used to benchmark the contributions to further sustainable transport initiatives."*

4.48 Urban&Civic and Homes England would support the further implementation of sustainable transport initiatives as the first choice.

Factors to Consider for Assessing Traffic Impacts of LSGR

4.49 The following factors will be considered in the detailed assessment of the impacts associated with a proposed development at LSGR:

- The spine road through the proposed development – the route through the site being open to all traffic, which is required in Policy SA02 in the draft HDC Local Plan (point 9d), is not in line with the Urban&Civic and Homes England vision for this new community (as this would facilitate dominance by the car). Notwithstanding this however, and as previously stated, SLR is undertaking ongoing discussions with LCC regarding the need, or otherwise, for the spine road to cater for through-traffic, and this will be subject to traffic modelling via an agreed approach with LCC; and
- As detailed above, highway mitigation measures should only be considered as a last resort and should only be required if there were significant traffic impacts across a large proportion of the day and not just peak hours. The modelling work moving forward to the Examination of the Local Plan and, indeed to support a planning application, should consider the operation of the local highway network across 12 hours of the day. SLR would suggest that if the network is shown to operate efficiently for the majority of this (and if LSGR does not have a severe impact in NPPF terms), then highway mitigation measures to increase capacity for the peak hours only will not be justified or needed to make the development proposals acceptable. Instead, monies should be focussed on delivering the "place" and local living to minimise the need to travel in peak times. It should also focus on sustainable travel improvements to cater for as many movements as possible that do ultimately need to leave the site at these times.

Discussion Point 8: Highway Mitigation Costs

4.50 **The highway mitigation costs outlined in the Harborough Local Plan STIA are high level Spon's estimates and design drawings have not been provided in the STIA to support these. Added to the points raised under Discussion Point 7, the costs identified and proportioned to LSGR should not be afforded any significant weight at this Local Plan stage. Should any highway mitigation measures ultimately be required, the methodology in proportioning contributions towards these will also require further scrutiny and agreement at the planning application stage**.

4.51 The costs referenced in the Harborough Local Plan STIA are based on rates from the Spon's Civil Engineering and Highway Works Price Book 2024 and "project experience" according to Appendix D of the Harborough Local Plan STIA. Whilst the use of Spon's is an industry accepted and suitable approach for the purpose of high level cost estimates, any mitigation measures ultimately required will need to be based on a sound and agreed modelling approach (in line with the Discussion Points raised in this Technical Note) and informed by a design drawing on which to cost it.

4.52 Other specific points to note in terms of the costs referenced at this stage would be that no allowance has been made for the following, and these will need accounting for at a more detailed stage before agreeing mitigation costs and cost apportionment:

- Professional fees;

- Ground investigation, or other surveys;
- Ground remediation, or removal of unsuitable material;
- Demolition of buildings/structures;
- Utility supplies and diversions;
- Statutory authority fees/approvals;
- Street lighting connections/reinforcement;
- Land ownership costs;
- Earthworks;
- Temporary works;
- Retaining structures;
- Diversion or upgrade of any drainage;
- Surface water attenuation or flow control devices;
- Repair/reinstatement of the existing highway outside of the proposed mitigation;
- Landscaping;
- Vehicle restraint systems; and
- Land drainage.

4.53 With regard to assumptions for the costs, the following is noted from the Harborough Local Plan STIA, with a comment provided from SLR in bold:

- Existing drainage has been assumed to have sufficient capacity to accept any additional run-off from the proposed highway mitigation. **SLR would again comment that this will need to be considered in detail prior to agreeing any mitigation costs**;
- Traffic management costs have been estimated based on a rate of £12,500 per month, and an assumed construction duration for each mitigation scheme. **SLR would comment that no construction programme has been provided by way of an assumption at this stage and so it is not possible to know the level of traffic management costs assumed for each scheme. Furthermore, traffic management costs would vary significantly depending on the extent of the specific mitigation scheme. With this in mind, SLR would suggest that a rate of £12,500 per month would not be applicable to all of the schemes referenced and a percentage of the construction estimate for each scheme may be more appropriate. This is something that can be considered in further detail once specific mitigation measures are agreed**;
- Preliminary costs have been assumed to be 15% of construction and traffic management costs for each scheme. **SLR would comment that this seems a reasonable assumption at this stage**;
- A contingency allowance of 20% has been included for each scheme. SLR would comment that there will be double counting involved with this figure, noting that an optimism bias has also been applied and this will need reviewing in line with any agreed mitigation measures; and
- As referenced above, an optimism bias of 46% has been applied to the costs for each scheme. This is stated as being based on the upper capital expenditure limit for standard civil engineering projects, in accordance with the Supplementary Green Book Guidance produced by HM Treasury. **SLR would comment that it typically uses an upper bound limit of 44% for standard civil engineering projects in line with Table 3 of the stated guidance. It also needs to be ensured that there is no double counting with the separate contingency allowance already applied in the Harborough Local Plan STIA work. As specific schemes are agreed**

and design drawings developed, any optimism bias should also be adjusted as uncertainties are reduced.

5.0 LCC Response to the Draft HDC Local Plan

Summary of LCC Response

5.1 LCC published its response to the HDC Local Plan on the 10th March 2025 in the form of a "Report of the Chief Executive", and which was to be discussed at Cabinet on 18th March 2025.

5.2 SLR has reviewed the comments provided by LCC, and note that LCC highlight the following key issues of relevance to the LSGR (for the avoidance of doubt, the comments summarised in the below bullet points are those of LCC):

- Little reference is provided to the Strategic Growth Plan, in which LSGR is included;
- The assessment is based on the modelling which informed the SLJTE with no new or separate modelling of traffic impacts;
- The SLJTE work is not at a stage where the contents of any package of strategic transport measures is confirmed and thus the HDC evidence is "*not being sufficiently mature at this time*" which "*raises questions as to the Plan's soundness*";
- LCC has not had any input into the Harborough Local Plan STIA;
- The assessment of impacts have not been fully set out and shows a misleading impression, in LCC's view, that the impacts will not be material;
- The mechanism for collection of developer contributions does not appear to be lawful in reality;
- Weak transport policies particularly with regard to cumulative / cross boundary impacts and reference to wider strategies / Infrastructure Plans;
- The delivery of elements of the Plan's spatial strategy are dependent on strategic scale improvements to the SRN, but LCC has no confidence that such will be brought forward and delivered within the Plan's time period; and
- The Local Plan does not provide a coherent policy basis for enabling the coordinated delivery of transport interventions to achieve sustainable development in reality.

5.3 In addition to the above, LCC reiterate the findings of the SLJTE in its consultation response, stating that there will be impacts on the A6 adding to existing issues; that traffic would avoid routes through the Leicester Urban Area by using lower class rural routes (referencing the potential for damage to these routes that were not designed for such high volumes of traffic); and that this is in the context of *'the lack of suitable orbital transport connectivity links around the east and south of Leicester'*.

5.4 LCC then notes the following regarding the requirement for Harborough to address the wider issues identified in the SLJTE (namely an orbital route):

"Whilst this issue/challenge is beyond what a Harborough Local Plan can reasonably be expected to address alone, equally it is important that the Plan does not fetter or frustrate the delivery of the strategic, multi-modal transport measures required to address this issue."

SLR Commentary

5.5 SLR acknowledges the points raised by LCC as the LHA and agrees that more detailed work is required in collaboration between HDC, LCC, and site promoters to determine specific transport and highways measures to allow the delivery of allocated sites. This should ultimately be based on a vision-led approach as outlined by the discussion points SLR has highlighted in **Section 4.0** of this report, and much of the detail of this will come in support of a planning application.

5.6 That being said, it is acknowledged that all parties need to be comfortable that the sites are deliverable as part of the Local Plan process, and SLR note that the SLJTE (published in January 2025 and instructed by LCC) had concluded this in principle. Noting that both the SLJTE and the HDC STIA pieces of work are based on the same strategic transport model (PRTM) and undertaken by the same consultant (AECOM), SLR is of the opinion that agreement on the soundness of the supporting AECOM work can be reached (in so far as supporting the principle of the allocated sites such as LSGR, and noting that specific details of the mitigation will need to be worked through up to Examination and through a planning application).

5.7 SLR, Urban&Civic and Homes England are committed to working with LCC, HDC (and OWBC) in the development of a vision-led approach to the proposed development at LSGR to agree a more realistic package of mitigation to achieve the vision for the site. This should be based on a representative baseline and realistic (not worst case) trip forecast for the proposed development. As previously noted, positive and constructive discussions are already underway between SLR and LCC on this point.

5.8 SLR notes the comments about an orbital route around the east and south side of Leicester, however with respect to LSGR the vision for the site would be to seek delivery of this without the need for such a vehicular route through the site. Notwithstanding this, however, SLR is again undertaking ongoing discussions with LCC regarding the need, or otherwise, for the spine road to cater for through-traffic. In line with the discussion points outlined in **Section 4.0**, it is the opinion of SLR that to deliver highway capacity such as this (that is focussed on the convenience of the car driver in traditional peak hours) would be against the ethos of vision-led planning and national policy, and that it would not deliver a sustainable new community at LSGR. SLR, Urban&Civic and Homes England will work with LCC to agree a suitable modelling approach and evidence base, however, to support this position over the coming months and ahead of the Local Plan Examination.

6.0 Summary and Next Steps

Summary

6.1 **Whilst SLR has identified a number of discussion points that need to be worked through with LCC and HDC in relation to the transport evidence base supporting the Harborough Local Plan, Urban&Civic and Homes England are pleased to see overall support for the delivery of the LSGR site from the respective authorities. This is particularly noting the conclusions drawn in the SLJTE that the Local Plan sites are deliverable (with the appropriate level of mitigation to be agreed) and in the HDC STIA that LSGR is again deliverable in conjunction with a level of mitigation (again noting the points in this Technical Note that the specifics, location and scale of these are to be agreed).**

6.2 **Urban&Civic and Homes England are also pleased that positive and constructive discussions are ongoing with HDC, OWBC and LCC, with a view to arriving at the Examination stage of the Local Plan whereby all parties are agreed in principle that the LSGR site can be delivered in transport and highways terms.**

6.3 **The key points from our review of the transport evidence are summarised below. It should be re-iterated that Urban&Civic and Homes England will continue to work closely with HDC, OWBC and LCC in terms of how the delivery of the LSGR site will be achieved based on a vision-led approach as the site moves forward to a planning application:**

- Although the modelling approach and transport evidence base makes passing references to vision-led planning, the underlying modelling approach is from a Predict and Provide ethos at this high level stage. It is not therefore in keeping with the national policy agenda or approaches that now need to be taken by local authorities in England, however SLR is working with LCC to develop a more refined modelling and assessment approach as the planning process progresses;
- In the SLJTE and STIA work to date, the vision for the new community at LSGR is not accounted for; nor are any identified mobility and placemaking interventions to help realise that vision. Whilst SLR understand that this will of course be a requirement for the design team working on behalf of Urban&Civic and Homes England to present as part of a future planning application (building on the vision outlined in our Regulation 18 submission), not fully accounting for this at the Local Plan stage does not therefore provide the best framework for site allocations (LSGR and others included) to come forward in a manner which would allow travel demands to be minimised;
- Without this approach, together with some potentially worst case outlooks on forecast demand that make no account for other societal or behavioural changes that need to occur, the current strategy has the potential to overestimate vehicle based demand. Indeed, SLR has demonstrated in this Technical Note that vehicular trip generation could be up to 54% lower in the peak hours than that currently modelled in the evidence base;
- As a result, this is potentially leading to a strategy of highway mitigation measures to alleviate perceived future travel demand problems which may not ultimately exist, and which are solely focussed on worst case peak hours. Conversely, however, if those road schemes are delivered this may have the end effect of inducing car traffic that may otherwise have been avoided. At this stage, therefore, the locations and scale identified for off-site highway mitigation in the transport evidence base should be treated with caution and these will need to be determined in due course based on an agreed modelling methodology (all of which is helpfully being discussed with LCC currently);
- The transport evidence base as it currently stands is not therefore fully achieving a proactive and visionary policy led approach; it is a reactionary approach to anticipated issues from a

strategic transport model, which of course has its place in the modelling hierarchy but is largely set up to report on highway network performance during traditional weekday peak periods; and

- Whilst strategic transport modelling is of course crucial in the Harborough Local Plan process, the input parameters and assumptions that go into that modelling should still be Vision led and ambitious. As it stands, worst case assumptions are being tested and mitigated for, and travel demand monitoring in many places in the UK often shows that those high traffic growth forecasts rarely become reality. Indeed, the traffic surveys that SLR has undertaken on the local highway network surrounding LSGR has shown this, with peak hour traffic flows being up to 23% lower in 2024 / 2025 compared to previous levels shown in 2015 / 2018.

Next Steps

6.4 Urban&Civic, Homes England and SLR is committed to working with LCC, HDC (and OWBC) in the development of a vision-led approach to the proposed development at LSGR. The objective of this will be to arrive at the Examination of the Local Plan with an agreed evidence base demonstrating the deliverability of the LSGR site and with a package of supporting measures (not necessarily highway capacity based) directly related to the development, and which are deemed necessary to make the site acceptable in planning terms.

6.5 This approach should be based on a representative baseline and realistic (not worst case) trip forecast for the proposed development, that considers journeys across the day and is not solely focussed on the operation of the local highway network during weekday peak hours.

6.6 The approach should also first give consideration to trip avoidance / internalisation (which is through the provision of on-site amenities, and acknowledging home working, online shopping and other emerging travel trends); then the promotion of active travel and public transport (the mobility strategy, and not just the infrastructure); and then also acknowledgement needs to be given to peak spreading, where in reality people change the time of their journey to avoid any congestion that may occur.

6.7 The above is not currently captured in the strategic modelling supporting the transport evidence base at this stage, and it does need consideration before any thoughts are given to mitigating residual car trips through junction improvements.

6.8 As noted throughout in this Technical Note, SLR is already in positive engagement with officers at LCC, HDC and OWBC to progress this work, and in order to meet the stated objective ready for the Examination stage.

Appendix A Policy, Guidance and Research Framework

Land South of Gartree Road

Regulation 19 Representation - Transport

Urban&Civic

SLR Project No.: 403.065817.00001

1 May 2025

Policy, Guidance and Research Framework

There are a number of policy documents and guidance notes which now set the scene for, and endorse, the adoption of vision-led planning (or Vision and Validate) as the favoured transport planning approach and to guide development coming forward in the best locations and with the best sustainable principles. Some key elements of these are briefly set out below and it is vital these are taken into account by Local Government bodies at the plan making (and planning application) stage.

Transport Decarbonisation Plan

The Department for Transport's (DfT) Transport Decarbonisation Plan, published in July 2021, sets out the government's commitments and the actions needed to decarbonise the entire transport system in the UK. With a quarter of the country's carbon emissions coming from this source – the most of any sector – significant reductions are required at local and national levels in order to realise overall net zero targets.

The plan acknowledges that Local Planning and Highways Authorities need to be supported by government to better plan for sustainable transport and develop innovative policies to reduce car dependency. Furthermore, it advises that: "we need to move away from transport planning based on predicting future demand to provide capacity ('predict and provide') to planning that sets an outcome communities want to achieve and provides the transport solutions to deliver those outcomes (sometimes referred to as 'vision and validate')".[1]

The Transport Decarbonisation Plan commits to embedding new principles across planning and transport policymaking. It supports the roll out of 15-minute neighbourhood principles which is a core element of vision-led planning to maximise accessibility within new communities on a scale where most amenities and services are within a short walk or cycle, reducing car dependency.

The plan also pledges to: "*place cycling, walking and public transport provision at the heart of local plan making and decision taking for new developments*".[2]

Commute Zero Programme

Emanating from the Decarbonising Transport plan, the Government has also published its Commute Zero Programme, which further underlines the importance of communities offering a variety of local employment opportunities as well as shared and low carbon mobility alternatives. Five percent of all transport emissions come from this source.

National Planning Policy Framework

Most importantly, the revised NPPF now sets the foundations for vision-led planning (paragraph 109), and defines this as "*an approach to transport planning based on setting outcomes for a development based on achieving well-designed, sustainable and popular places, and providing the transport solutions to deliver those outcomes as opposed to predicting future demand to provide capacity (often referred to as "predict and provide")*"[3].

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[1] https://www.gov.uk/government/publications/transport-decarbonisation-plan p158

[2] https://www.gov.uk/government/publications/transport-decarbonisation-plan p157

[3] NPPF December 2024

The adoption of this approach came off the back of the consultation on the NPPF reforms in the summer of 2024, and which specifically flagged that "*at present, planning for travel too often follows a simplistic 'predict and provide' pattern, with insufficient regard for the quality of places being created or whether the transport infrastructure which is planned is fully justified.* ***Challenging the default assumption of automatic traffic growth, where places are designed for a 'worst case' peak hour scenario, can drive better outcomes for residents and the environment***"[4].

Also, Paragraph 115 states:

In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;

b) safe and suitable access to the site can be achieved for all users;

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and

d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.

Cycling and Walking Strategy

The DfT has published its cycling and walking strategy which aims for active travel to be the natural first choice for many journeys with half of all trips in towns and cities being cycled or walked by 2030, with expected carbon and public health benefits.[5]

Royal Town Planning Institute

Whilst not a policy document, the Royal Town Planning Institute Project "Net Zero Transport"[6] outlines a number of important themes that are recommended to be adopted in national and local policy. SLR Consulting was a partner in the research consortium for this project, which demonstrated the contribution of spatial planning and place-based solutions towards transport decarbonisation and multiple co-benefits including resilience and public health.

Effective Leadership

The research of this project highlighted that[7] a *"perceived lack of leadership within central and local government and the development industry is a major barrier to achieving net zero transport and better placemaking. Without effective leadership, it is immensely challenging to drive forward the net zero*

[4] NPPF consultation 2024, paragraph 7.

[5] https://assets.publishing.service.gov.uk/media/5f1f59458fa8f53d39c0def9/gear-change-a-bold-vision-for-cycling-and-walking.pdf

[6] https://www.rtpi.org.uk/media/7593/rtpi-overcoming-barriers-to-net-zero-transport-january-2021.pdf

[7] https://www.rtpi.org.uk/media/7593/rtpi-overcoming-barriers-to-net-zero-transport-january-2021.pdf, page 5.

agenda and ensure that plans, policies and decision-making prioritise measurable decarbonisation and the creation of better places."

It then goes on to say that a *"place-based approach to transport decarbonisation will require radical transformation of how we plan, design and use space. Many of these changes will require major adjustments to how people live their lives and move around on a daily basis. These adjustments should deliver multiple benefits to people and communities in the form of healthier, happier, more resilient communities, better access to amenities and greenspace, safer and more equitable mobility, a more resilient natural environment and a more secure future for the planet".*

Following this the document continues that *"some of the changes required to deliver these benefits will be controversial, as they involve curtailing private vehicle movements and ensuring that alternative modes of travel are always the easier and more affordable option. This is necessary as the evidence suggests that providing viable alternatives to private vehicle use, without also making it more difficult to drive, will not achieve net zero emissions in the required timescale. It would also fail to realise the wider placemaking benefits that arise from reducing the dominance of vehicles in the public realm and from creating space for people".*

Finally on this theme, the document states that "*difficult decisions are needed both to reach net zero and to realise its full potential for transformative change, and we will not succeed without taking them*" and that *"the political leadership needed to make those difficult decisions is currently lacking".* The creation of Active Travel England [ATE] in August 2022 to implement DfT's walking and cycling strategy, address issues like improving infrastructure and local authority capabilities and to act as a statutory consultee to planning applications, illustrates a shift towards this.

Public Policy Integration

The project highlighted the lack of integration between national and local policy, together with planning and transport policy, in achieving net zero targets and the delivery of better places for people to live and work in. As a result, it specifically recommended that[8]

- *"…all land allocated for development (or zoned for 'Growth' or 'Renewal' in Local Plans under proposals put forward in the Planning White Paper) is subject to strict requirements for delivery of outcomes related to zero carbon transport and local living and is accompanied by an ambitious, place specific vision";* and
- *"Place a duty on transport planning authorities to ensure that Local Transport Plans are prepared on the basis of a vision-led approach with the purpose of meeting defined carbon reduction targets, reducing trips, maximising use of active and shared modes and achieving the ultimate goal of net zero emissions from transport in the local area".*

Changing Behaviour

A final theme to highlight from the RTPI project is how it identifies the[9] *"behavioural attachment to cars" as "perhaps the most intractable barrier to delivering place-based solutions to decarbonisation".*

It goes on to reference how transport is the largest emitting sector in the UK and that there is a cultural norm associated with driving. In view of this, and *"if the decarbonisation of transport is to be a catalyst*

[8] https://www.rtpi.org.uk/media/7593/rtpi-overcoming-barriers-to-net-zero-transport-january-2021.pdf, page 8.

[9] https://www.rtpi.org.uk/media/7593/rtpi-overcoming-barriers-to-net-zero-transport-january-2021.pdf, page 13.

for creating healthier, happier and resilient communities", it concludes that "*it requires an honest discussion at national and local level over the scale of changes needed and the respective roles that government, communities and individuals need to play in reaching net zero as quickly and as equitably as possible*".

Land use and transport planning: DfT Science Advisory Council Paper

This Paper[10] was published in April 2024 and provides an independent view on how science and evidence can encourage better and more sustainable land use and transport planning decision-making; Mike Axon, SLR's Global Director of Transport Planning, was a contributor to this paper. This is from the perspective of considering how land use strongly influences trip demands, lengths and intensities and, in conjunction with the transport network and service provision, on the modal shares of trips as well.

The recommendations set out in the Paper are:

1 *"There is a need for more robust datasets collating evidence that shows the effects of building sustainable transport networks and local facility provision into new developments. These datasets need to include trip numbers, trip lengths and mode shares – plus wider health, social, economic and environmental indicators. Given the limited evidence available in the UK, data should be sought from international case studies. There is a need to build a wider evidence base of what 'good' looks like for a variety of contexts and scales, referenced to designs of new developments for car-independency that are shown to have been successful.*

2 *There is an opportunity to quantitatively evaluate how higher-density residential developments might play a role in supporting better quality public transport (including demand-responsive) services and a wider range of local community facilities. Evidence is needed to show how good planning and design can rise to the challenge of meeting residents' needs (and allaying their concerns) and maximising the attractiveness of these developments.*

3 *The tools used to estimate the trip/traffic generation of new sites and larger developments (such as TRICS and NTEM) should be refined to reflect the connectivity and sustainable mobility provisions of a proposed development, and its likely impacts on travel patterns. This should be linked to the DfT connectivity tool and assessments made which take into account a much wider range of indicators, including a greater emphasis on carbon impacts. These analyses should be consolidated in a comprehensive transport impact assessment as part of the assessment of individual developments and local plans.*

4 *Further evaluation is needed of the current incentive structures that motivate the various actors to promote largely car-dependent developments and identify pricing or regulatory changes that would help align commercial interests with other objectives around public health, net zero and quality of life.*

5 *A study should be commissioned into the governance arrangements that underpin the land use planning process and its operation in practice, taking a broader systems view and accounting for the various private and public sector actors, at both local and national levels. The aim would be to identify barriers and conflicting pressures when trying to promote sustainable developments, including community facilities and sustainable transport networks.*

6 *The national planning policy framework should be reviewed to ensure it fully reflects the current science and evidence in support of delivering sustainable developments including recommending the DfT connectivity tool as a site-sifting mechanism; and ensuring that its*

[10] https://www.gov.uk/government/publications/land-use-and-transport-planning-dft-science-advisory-council-paper/land-use-and-transport-planning-dft-science-advisory-council-paper

wording empowers local authorities to reject schemes that do not fit the framework without the risk of losing at appeal.

7 *Training using the latest data and evidence should be provided to enable important actors – in local and national government, the private sector and relevant agencies – to better address sustainability considerations and work collaboratively, along with the resources needed to support and promote sustainable developments that provide realistic travel choices."*

New Developments and Shared Transport: Cutting Car Dependency

This report[11] published by Collaborative Mobility UK explores how shared transport is currently considered within the development planning process by different stakeholders and identifies potential opportunities for improvement in the process.

The study provides some of the following recommendations:

- *"Redefine planning policy around people and place rather than cars: Develop a bold vision for the creation of people centric neighbourhoods, placing shared transport at the heart of new policy. This policy should also deliver access via sustainable transport modes to key amenities such as shops, healthcare and green space. The revised approach should be formalised through Supplementary Planning Guidance.*
- *Coordination of planning and transport: There is a need for planning authorities to work hand in glove with other public authorities, highway authorities in particular, to ensure this ambitious approach is successful.*
- *Invest in portfolio of sustainable transport options: There is a need to invest in a package of alternatives to car travel including high quality public transport, integrated with cycling infrastructure, and a pool of shared cars and bikes, housed within mobility hubs. It is also important to ensure there is a range of amenities in walking distance.*
- *Build in meaningful developer contributions: Use developer contributions to boost transport sustainability. Ensure contributions begin at the point of the first residents moving in. Ensure planners, developers and landowners are fully engaged with the operators to co-design the shared transport solutions for the area. Create a fund of contributions to support car club development across the city which will ensure the wider scheme flourishes for the benefit of all.*
- *Engage with shared transport operators early in the process: Planners, landowners, and developers should review latest best practice of deploying shared transport. They should make contact with operators from the start of the process to draw upon their expertise for site specific advice."*

The vision for a proposed development at LSGR can be in-line with the above recommendations (as appropriate), which will provide a sound basis for minimising vehicle movements on the highway network.

Less is More: Changing Travel in a Post-Pandemic Society

Following the Covid-19 pandemic, a study[12] was undertaken to explore how, why and how much we travel has changed through the Covid-19 pandemic and to set out what the opportunities and risks are to future transport policy of the changes observed.

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[11] New developments and shared transport: cutting car dependency, Collaborative Mobility UK (CoMoUK), February 2022

[12] Less is more: Changing travel in a post-pandemic society, Jillian Anable, Llinos Brown, Iain Docherty and Greg Marsden (March 2022)

The key conclusions relevant to commuting from the study were as follows:

- Car traffic was not back to pre-pandemic levels. Weekday car traffic in England stabilised around 10% below pre-pandemic levels throughout summer and autumn 2021 with falls in peak time congestion;
- Working from home, for those who could, played a critical part in reducing traffic levels. Even if people who have worked from home go back to travelling for half of their working week, there would still be a reduction of 16% in car commute miles; and
- Car ownership had fallen. The sale of used – and, in particular, new – cars has fallen below pre-pandemic levels. There has been a significant increase in the number of households reducing from two cars to one. The pandemic did not lead to a 'dash to the car'.

These trends are reflected at the local level based on recent traffic data (2024 and 2025) that has been collected on the highway network in the vicinity of LSGR, which is detailed further in **Section** Error! R eference source not found..

Changing Travel Trends 2002 - 2022

The research and development team at SLR has undertaken extensive research regarding changing travel trends between 2002 and 2022, and which are relevant when considering the transport evidence base for the HDC Local Plan.

The research identified a decrease in the average number of private car / van journeys and a reduction in the average distance of private car / van journeys between 2002 and 2022 - across all journey purposes, except education.

It also shows a greater reduction in the annual average number of car trips for lower age groups, which indicates how car travel is likely to continue to reduce in the future as those generational trends follow those same people up the age spectrum; see illustration in **Table 1.**

Table 1 Change in no. Annual Car / Van Trips by Age Group, 2002-2022

Age Group	Percentage Change in Annual Average Number of Car / Van Trips 2022-2022 (%)
17-20	-37
20-29	-29
30-39	-24
40-49	-18
50-59	-14
60-69	+7
70+	+31

The research also shows that the average number of commuting trips made by car and van drivers has decreased steadily from 96 per year in 2002 to 75 per year in 2019. Numbers fell further to 57 during the 2020 pandemic returning to 69 in 2022, still below the levels seen just before the pandemic. Over the

2002-2022 period this reflects a 28% decrease in the number of commuting car trips per year, and needs to be considered when planning for the proposed development at LSGR.

Appendix B Trip Generation Technical Note

Land South of Gartree Road

Regulation 19 Representation - Transport

Urban&Civic

SLR Project No.: 403.065817.00001

1 May 2025

Land South of Gartree Road

Trip Generation – Detailed Assessment Report

Urban&Civic

Prepared by:

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SLR Project No.: 403.065817.00001

1 May 2025

Revision: 2

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
1	30 May 2024	S Wright	D Moran	J MacPherson
2	1 May 2025	S Wright	D Moran	J MacPherson

Basis of Report

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1.0 Introduction

1.1 This Report should be read in conjunction with the Regulation 19 Representation – Transport report for a residential led mixed use scheme, known as Land South of Gartree Road (LSGR). Its purpose is to expand on the information provided in the Regulation 19 Representation – Transport report, in order that technical review/audit can be conducted on the trip generation approach and results for the LSGR site.

1.2 The trip generation assessment of the proposed development is based on a Vision-led Planning approach to the assessment of trip impacts placing virtual, local and active travel at the forefront of masterplanning.

1.3 SLR has developed a tool to quantify the impacts of development sites designed following Vision-led Planning principles and tailored to specific site characteristics.

1.4 This report is intended as a detailed technical description of methodology applied within the SLR Vision-led Planning Tool, illustrating, step-by-step, how the trip generation numbers have been derived for LSGR.

2.0 Establishing trip making base data tailored to the LSGR site

2.1 The SLR Vision-led Planning Tool estimates the trip generation and modal share emanating from a new site according to the numbers of trips people make for different purposes to particular amenities as well as for non-amenity related purposes. The output includes:

- external and internal trips (all trips and car trips) generated by the residential uses;
- external and internal trips (all trips and car trips) generated by all the proposed amenities including employment uses;
- time period: All trips and car trips shown for 24 hour and each individual hour; and
- mode share summary for internal and external trips for all time periods.

2.2 The base data for the SLR Vision-led Planning Tool is 2023 average NTS data by area classification (urban conurbation, urban city and town, rural town and fringe, rural village and isolated) broken down by 14 trip purposes, 13 modes of travel, and 8 distance bands.

2.3 In order to better reflect local circumstances, this data is adjusted according to a number of factors including:

- adjustments to reflect the mix of household type and hence type of resident likely to settle in the new development, this influences trip generation rates and mode shares for these trips;
- adjustments to reflect proximity of the new site to existing amenities and employment. E.g., if no amenities exist within 2 miles of the site, then average NTS data that suggests a share of trips will be within 0-1 mile and 1-2 mile distance bands is clearly incorrect and so requires adjustment to reflect the local conditions; and
- adjustments to better reflect existing transport provision/connections to and around the new site. E.g., if average NTS data suggests a % train mode share but no train services exist near the local site.

2.4 Therefore, the adjusted base data provides relevant base data on numbers and distances of trips by purpose and mode taking into account the following:

- type of area / location of the site;
- the proximity to existing amenities and employment;
- the current mobility provision surrounding the site; and
- type/mix of residents expected to reside in the site.

2.5 The result is base data that reasonably represents the trip making demands of the people likely to live in the new development and reflects the local character of the site and its location.

2.6 The LSGR Grange development is designated as sitting within the 'Urban City and Town' area classification where the site population is over 10,000 or adjoins an existing built up area with combined population over 10,000 but does not adjoin a large conurbation[1].

2.7 2023 NTS data for 'Urban City and Town' area classification provides average trip making behaviours of residents living in 'Urban City and Town' areas across England broken down by 14 trip purposes, 13 modes of travel, and 8 distance bands. This data contains average annual number of trips per person

[1] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/239084/2001-rural-urban-definition-methodology-technical.pdf

by mode of travel (13 modes included) for each of 8 distance bands. This informs us of the likely proportions of people that use each mode within each distance band for the different trip purposes.

Trip Pusposes
Commuting
Shopping
Education
Escort Education
Personal Business
Visiting friends at home
Visiting friends elsewhere
Entertainment / public events
Sports
Other including just walk
Day trips
Other Escort
Business
Holiday

Modes
Walk
Bicycle
Car/van driver
Car/van passenger
Motorcycle
Other private transport
Bus in London
Other local bus
Non-local bus
London Underground
Surface Rail
Taxi / minicab
Other public transport

Distance Bands
Under 1 mile
1 to under 2 miles
2 to under 5 miles
5 to under 10 miles
10 to under 25 miles
25 to under 50 miles
50 to under 100 miles
100 miles +

2.8 A sample of the data is shown in **Figure 2-2** for shopping trips of residents in Urban City and Town areas. Equivalent data is available for the other 13 trip purposes. This data is available for each different area classification.

Figure 2-1 NTS base data on shopping trips for urban city and town area classification

Shopping											
Trip distance - including short walk - miles - banded distance - 12 categories											
	Under 1 mile	1 to under 2 miles	2 to under 5 miles	5 to under 10 miles	10 to under 25 miles	25 to under 50 miles	50 to under 100 miles	100 miles +		TOTAL	
Walk	39	8	1	[low]	0	0	0	0		48	26.9%
Bicycle	1	1	1	[low]	[low]	0	0	0		2	1.1%
Car/van driver	9	24	35	12	6	1	[low]	[low]		88	48.7%
Car/van passenger	3	7	14	5	4	1	[low]	[low]		32	18.0%
Motorcycle	[low]	[low]	[low]	[low]	[low]	0	0	0		[low]	0.2%
Other private transport	1	[low]	[low]	[low]	[low]	[low]	[low]	0		1	0.7%
Bus in London	[low]	0	[low]	[low]	0	0	0	0		[low]	0.0%
Other local bus	[low]	1	3	1	1	[low]	0	0		6	3.3%
Non-local bus	0	0	0	0	0	[low]	[low]	0		[low]	0.0%
London Underground	0	0	0	0	0	0	0	0		0	0.0%
Surface Rail	0	[low]	[low]	[low]	[low]	[low]	[low]	[low]		1	0.4%
Taxi / minicab	[low]	[low]	1	[low]	0	0	0	0		1	0.6%
Other public transport	0	0	[low]	0	[low]	0	0	0		[low]	0.0%
	53	41	54	18	11	2	[low]	[low]		**180**	
	29.2%	22.9%	30.2%	10.0%	6.2%	1.2%	0.2%	0.1%			

Proportion of all shopping trips										
	Under 1 mile	1 to under 2 miles	2 to under 5 miles	5 to under 10 miles	10 to under 25 miles	25 to under 50 miles	50 to under 100 miles	100 miles +		
Walk	21.8%	4.4%	0.7%	0.0%	0.0%	0.0%	0.0%	0.0%		27%
Bicycle	0.4%	0.4%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%		1%
Car/van driver	5.1%	13.2%	19.6%	6.5%	3.6%	0.6%	0.1%	0.0%		49%
Car/van passenger	1.5%	3.7%	7.5%	2.7%	2.0%	0.5%	0.1%	0.0%		18%
Motorcycle	0.0%	0.0%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%		0%
Other private transport	0.3%	0.2%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%		1%
Bus in London	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0%
Other local bus	0.1%	0.7%	1.6%	0.5%	0.4%	0.1%	0.0%	0.0%		3%
Non-local bus	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0%
London Underground	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0%
Surface Rail	0.0%	0.0%	0.0%	0.1%	0.2%	0.1%	0.0%	0.0%		0%
Taxi / minicab	0.1%	0.2%	0.3%	0.1%	0.0%	0.0%	0.0%	0.0%		1%
Other public transport	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0%
	29%	23%	30%	10%	6%	1%	0%	0%		

2.9 Plots of the mode share by distance band data for each trip purpose has been used to extrapolate the data to provide distance band data for 0.0-0.5 miles; 0.5-1.0 miles; 1.0-1.5 miles; 1.5-2.0 miles; 2.0-3.0 miles and 3.0-5.0 miles.

2.10 This provides the base data explaining average trip making behaviour of Urban City and Town residents giving the proportions of all trips made for each of the 14 trip purposes and the percentage of trips by each mode within each distance range for each purpose. It is then necessary to apply adjustments to this base data in order to better reflect the character and location of the LSGR site.

2.11 Firstly, account is made for the variation in composition of residents within the LSGR development compared to the average composition for 'Urban City and Town' areas. It is often the case that new developments have a larger proportion of 3 and 4 bedroom homes than the average for an area type and hence have relatively more families with children. This results in relatively higher numbers of trips than is the case for dwellings with only adults.

2.12 The exact composition for LSGR is not yet decided. As a result, default data is applied that assumes the mix of residents reflects the average mix of household types across new builds in the UK: Derived from National House Building Council (NHBC) statistics - New Homes Statistics Review 2021[2] and English Housing Survey data on new households and recent movers[3]. This results in the household composition shown in **Table 2-1.**

Table 2-1 Assumed composition of household type for LSGR site

Household Type	% Dwellings
Single adult	14%
2 adults	28%
3 or more adults	7%
Single parent family	8%
2 adults, 1 or more children	38%
3 or more adults, 1 or more children	5%

[2] https://www.nhbc.co.uk/binaries/content/assets/nhbc/media-centre/stats/nhbc-annual-registration-statistics-2021-data-booklet.pdf

[3] https://www.gov.uk/government/statistical-data-sets/new-households-and-recent-movers

NTS0706 data[4] provides the variation in total numbers of trips per year for different household types as well as the variation in mode share by household type. This is then applied to the household composition for the LSGR site (**Table 2-1**) to obtain an average number of trips per person and mode share for these trips based on the household composition. This provides an adjustment factor that is applied to the NTS base data presented in 2.4 to better reflect the trip making of residents in the LSGR development.

2.13 A second adjustment is made is to correct for (un)availability of certain modes of travel from the LSGR site. On average, for 'Urban City and Town' areas the base NTS data indicates that there are 1% of trips made by surface rail. This is not possible from the LSGR site due to a lack of rail connection. A manual adjustment is made to reallocate this 1% mode share from surface rail to car driver.

2.14 An example of the adjusted base data is presented in **Figure 2-3** for shopping trips.

2.15 The overall base data mode share across all trip purposes for LSGR is illustrated in the **Table 2-2.**

Figure 2-2 NTS base data for shopping trips adjusted to reflect household types at LSGR site

Proportion of all shopping trips - NTS base with household type adjustments

	Under 0.5 miles	0.5 to under 1 mile	1 to under 1.5 miles	1.5 to under 2 miles	2 to under 3 miles	3 to under 5 miles	5 to under 10 miles	10 to under 25 miles	25 miles +		
Walk	14.5%	7.2%	2.9%	1.5%	0.5%	0.2%	0.0%	0.0%	0.0%	27%	
Bicycle	0.2%	0.2%	0.2%	0.2%	0.1%	0.1%	0.0%	0.0%	0.0%	1%	
Car/van driver	1.8%	3.6%	6.9%	6.9%	6.8%	13.7%	6.8%	3.7%	0.8%	51%	
Car/van passenger	0.5%	1.0%	2.0%	2.0%	2.7%	5.3%	2.9%	2.1%	0.6%	19%	
Motorcycle	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0%	
Other private transport	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0%	
Bus in London	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0%	
Other local bus	0.0%	0.0%	0.1%	0.1%	0.2%	0.4%	0.2%	0.1%	0.0%	1%	
Non-local bus	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0%	
London Underground	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0%	
Surface Rail	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0%	
Taxi / minicab	0.0%	0.0%	0.1%	0.1%	0.1%	0.2%	0.1%	0.0%	0.0%	1%	
Other public transport	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0%	
											% all trips
	17%	12%	12%	11%	10%	20%	10%	6%	1%		16.9%

Table 2-2 Base NTS data and adjustments for LSGR household type and local infrastructure

NTS data on average modal share for Urban City and Town area classification			Base modal share adjusted to account for mix of household type		Updated base modal share to account for local infrastructure
Walk	29%		29%		29%
Bicycle	2%		2%		2%
Car/van driver	42%		41%		44%
Car/van passenger	21%		22%		23%
Motorcycle	0%		0%		0%
Other private transport	1%		1%		0%
Bus in London	0%		0%		0%
Other local bus	3%		3%		1%

[4] Table NTS0706 Travel by household type and main mode / stage mode: England, from 2023

NTS data on average modal share for Urban City and Town area classification			Base modal share adjusted to account for mix of household type		Updated base modal share to account for local infrastructure
Non-local bus	0%		0%		0%
London Underground	0%		0%		0%
Surface Rail	2%		1%		0%
Taxi / minicab	1%		1%		1%
Other public transport	0%		0%		0%

2.16 The third adjustment to the NTS base data is made to reflect the proximity of existing amenities in the local area surrounding the LSGR development. The NTS base data indicates that mode share to an amenity changes markedly with distance - especially for shorter distances. This is illustrated in **Figure 2-4** below plotting NTS data on mode share against distance for shopping trips and illustrating the significant shift in mode share, primarily from car driver to walk, as distances are reduced from 1-2 miles to under 1 mile.

2.17 This highlights the importance of taking into account the distances from the proposed LSGR site to existing amenities external to the site in order to reflect the locally relevant mode share for each trip purpose. The road or footpath distance from the centre of the LSGR site to the closest existing amenities are shown in **Table 2-3.**

Figure 2-3 Plot of NTS data on mode share against distance for shopping trips

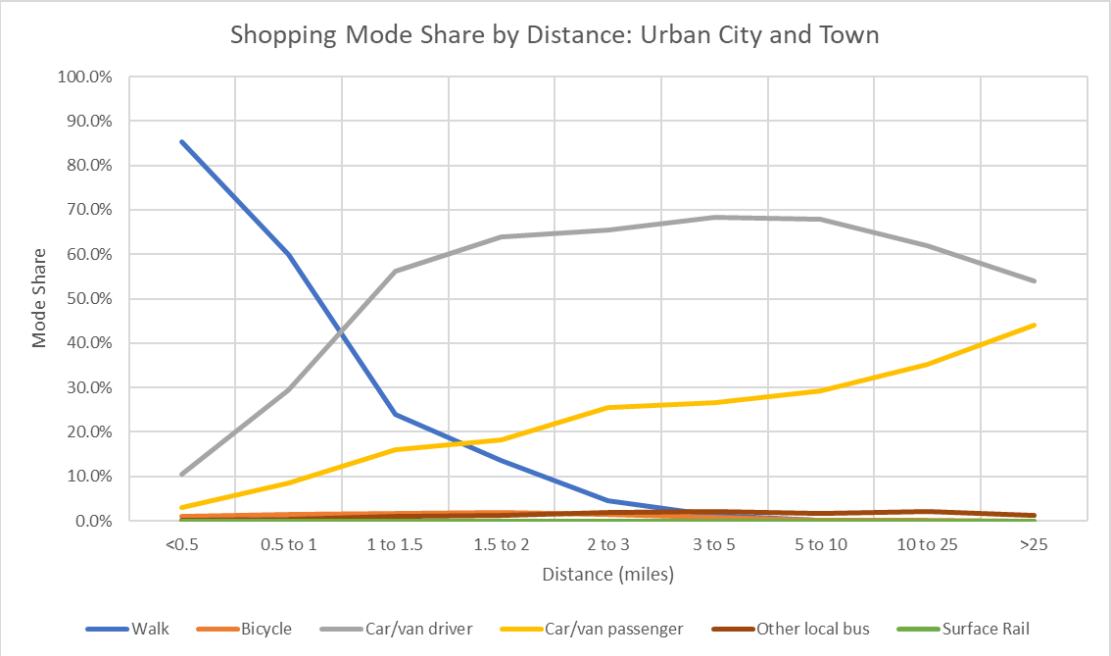


Table 2-3 Distance from the centre of the LSGR site to the closest existing amenities

	Closest External Amenity Name	Road network / Pedestrian network distance from central point of new site to nearest existing amenity **(km)**
Primary School	Woodland Grange	2.4
Secondary School	Manor High School Leicester Grammar	1.6
Convenience store	Sainsburys Co-op	2.3
Café / Coffee Shop	Starbucks Penbury Farm	2.4
Bars / Pubs	The Fox Pond	2.1
Restaurants	Cheikho's	2.6
GP	Severn Surgery Croft Medical Centre	1.1
Gym	Parklands Leisure Centre	3.4
Community Hall / Hub	Walter Charles Centre Great Glen Village Hall	2.6
Chemist	Severn Pharmacy County Pharmacy	1.1
Hairdresser + other beauty	La Femme Belle Solo Hairdressing	2.6
Hardware store	Jeffs Hardware	8.5
Clothes shop	City Centre	10
Nearest Large Scale Employment (e.g. Town Centre / Business Park)	City Centre	10

2.18 This distance information (**Table 2-3**) is used to adjust the base case modal share to reflect the local site geography and proximity of the new site to existing amenities and employment. The adjustment procedure determines if the closest amenity for a particular trip purpose is within the shortest distance band (i.e. <0.5 miles). If so, then no adjustment is made to the base case NTS data for that trip purpose. If not, then it allocates the proportion of trips in that distance band to the trip proportion in the next distance band (i.e. 0.5-1.0 miles) and applies the NTS mode shares for that (0.5-1.0 miles) distance band to the summed proportion of trips. This is repeated until the distance band in which the closest amenity sits is reached.

2.19 To illustrate the approach, the closest Gym is 3.4km (2.125 miles) from the centre of the LSGR site. NTS base data for Sports/Leisure trips indicate 5% of trips are < 0.5 miles, 4% are 0.5-1.0 miles, 11% are 1.0-1.5 miles, and 10% are 1.5-2.0 miles in Urban City and Town areas (see **Figure 2-4**). Since the nearest existing sports/leisure facility is over 2 miles distant from the site, these 5%+4%+11%+10% of trips are added to the proportion of trips in the 2-3 mile distance band to increase this from 11% to 42% of all trips to sport/leisure falling in this distance band. The relevant mode shares for this distance band are then applied to 42% of sport/leisure trips rather than the original 11% of sport/leisure trips.

Figure 2-4 NTS base data for sports/leisure trips

Nearest Sports/Leisure Amenity	2.125	Miles								
Proportion of all sports trips - NTS base with household type adjustments										
	Under 0.5 miles	0.5 to under 1 mile	1 to under 1.5 miles	1.5 to under 2 miles	2 to under 3 miles	3 to under 5 miles	5 to under 10 miles	10 to under 25 miles	25 miles +	
Walk	3.1%	1.5%	1.7%	0.8%	0.1%	0.1%	0.0%	0.0%	0.0%	7%
Bicycle	0.6%	0.6%	0.5%	0.5%	0.2%	0.2%	0.0%	0.0%	0.0%	3%
Car/van driver	0.4%	0.8%	3.9%	3.9%	4.5%	9.0%	10.3%	6.6%	2.1%	42%
Car/van passenger	0.7%	1.5%	5.0%	5.0%	5.8%	11.6%	10.6%	5.6%	1.5%	47%
Motorcycle	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0%
Other private transport	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0%
Bus in London	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0%
Other local bus	0.0%	0.0%	0.0%	0.0%	0.2%	0.3%	0.0%	0.2%	0.0%	1%
Non-local bus	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0%
London Underground	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0%
Surface Rail	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0%
Taxi / minicab	0.0%	0.0%	0.0%	0.0%	0.1%	0.3%	0.0%	0.0%	0.0%	0%
Other public transport	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0%
	5%	4%	11%	10%	11%	22%	21%	12%	4%	
Adjustment for Nearest Amenity	0%	0%	0%	0%	42%	22%	21%	12%	4%	

2.20 This procedure is applied to the other trip purposes where amenity proximity is relevant. Some trip purposes are not linked to amenity location (e.g. visiting friends at home; just going for a walk) and so no adjustment is necessary for these (see **paragraphs 5.12** to **5.18** for more details on how these trips are accommodated).

2.21 This builds in local realities to the base NTS data and avoids the risk of mis-representing mode choices for trip generation from the new development. A failure to reflect local conditions is often cited as a weakness that is inherent in using NTS data that is based on data averaged across a wider area to determine trip generation from a specific site. This calibration and adjustment methodology implemented by the Vision-led Planning Tool overcomes this weakness.

2.22 The final adjusted base mode share is presented in **Table 2-4**. This indicates the likely mode share for residents of the new development if no on-site amenities are included in the development.

Table 2-4 Base NTS data and adjustments for LSGR household type, local infrastructure and existing amenity proximity

NTS data on average modal share for Urban City and Town area classification		Base modal share adjusted to account for mix of household type	Updated base modal share to account for local infrastructure	Final base modal share based on household types, local conditions and existing amenity provision
Walk	29%	29%	29%	24%
Bicycle	2%	2%	2%	2%
Car/van driver	42%	41%	44%	46%
Car/van passenger	21%	22%	23%	24%
Motorcycle	0%	0%	0%	0%
Other private transport	1%	1%	0%	0%

NTS data on average modal share for Urban City and Town area classification			Base modal share adjusted to account for mix of household type		Updated base modal share to account for local infrastructure		Final base modal share based on household types, local conditions and existing amenity provision
Bus in London	0%		0%		0%		0%
Other local bus	3%		3%		1%		2%
Non-local bus	0%		0%		0%		0%
London Underground	0%		0%		0%		0%
Surface Rail	2%		1%		0%		0%
Taxi / minicab	1%		1%		1%		1%
Other public transport	0%		0%		0%		0%

3.0 Amenity Assessment

3.1 The SLR Vision-led Planning Tool also includes an amenity assessment function to inform the user of the specific amenities that are likely to attract sufficient demand from within the new development to be considered effective for containment purposes.

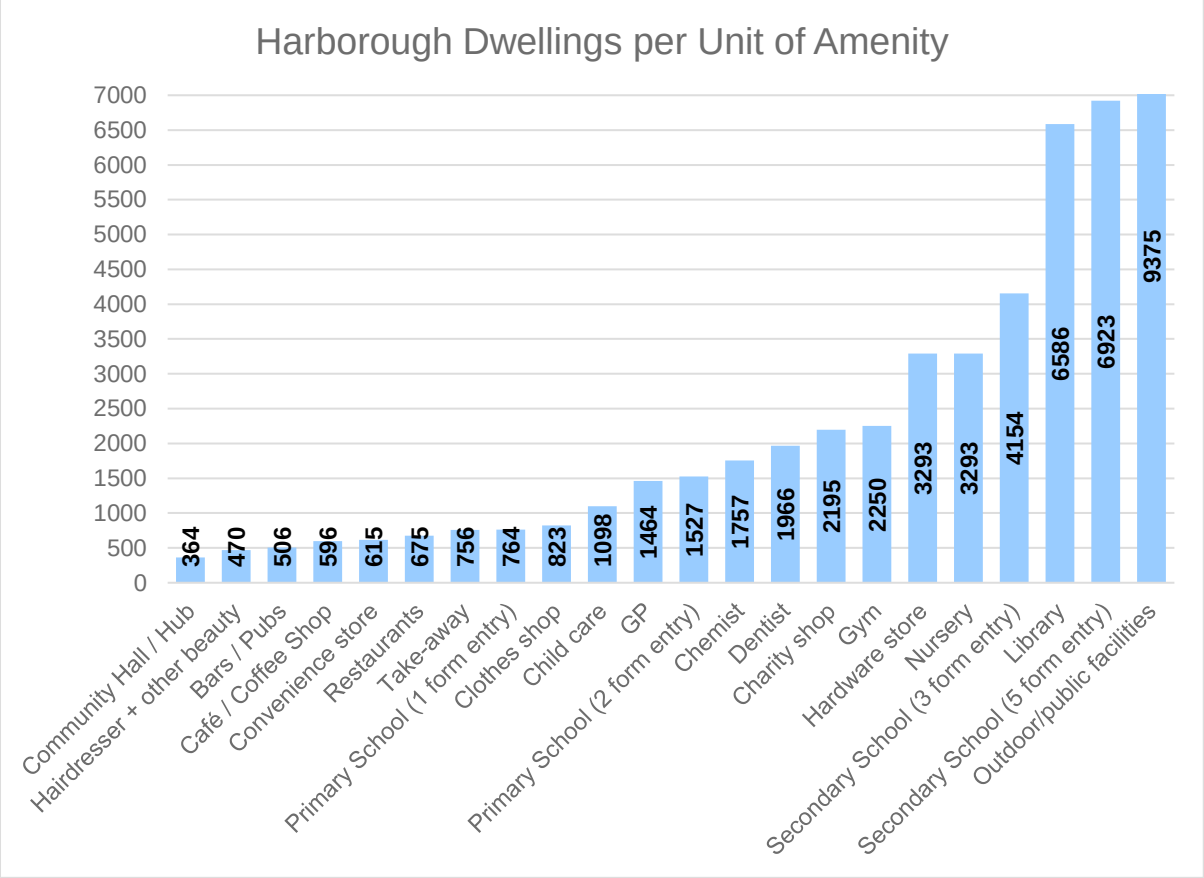
3.2 UK Business Count data on numbers of local units of different amenities for each LA District (https://www.nomisweb.co.uk/datasets/idbrlu) combined with the population per District gives the average population per unit of amenity in each District. This provides an indication of the number of dwellings needed to sustain a single unit of each kind of amenity in each district of the country. The data for the Harborough District is reproduced in **Table 3-1** below.

3.3 For schools the calculation of number of dwellings required is based on pupil yield factors combined with the number of education years and number of forms entry and assuming 30 pupils per class. For LSGR, pupil yield factors applied are 30 Primary School pupils per 100 dwellings and 17.1 Secondary School pupils per 100 dwellings. e.g. A new 1 form entry primary school (30 pupils in each of the seven years with a total of 210 pupils) becomes necessary when number of dwellings exceed 700 (applying pupil yield of 30 pupils per 100 dwellings and 7 years of 30 pupils per year).

Table 3-1 Average number of dwellings per unit of each kind of amenity in the Harborough District

	Average population per unit of amenity for Harborough	Average number of dwellings required per unit of amenity for viability in your development	
Shopping related Amenities			
FOOD			
Convenience store	1,783	615	
Take-away	2,193	756	
NON-FOOD			
Hardware store	9,550	3293	
Clothes shop	2,388	823	
Chemist	5,096	1757	
Charity shop	6,367	2195	
Entertainment related activity + Social outside home	Harborough: population per amenity	Harborough: dwellings per amenity	
Restaurants	1,958	675	
Bars / Pubs	1,468	506	
Café / Coffee Shop	1,727	596	
Sport participate related activity	Harborough: population per amenity	Harborough: dwellings per amenity	
Gym	6,526	2250	

	Average population per unit of amenity for Harborough	Average number of dwellings required per unit of amenity for viability in your development	
Outdoor/public facilities	27,187	9375	
Personal Business related activity	Harborough: population per amenity	Harborough: dwellings per amenity	
GP	4,244	1464	
Dentist	5,701	1966	
Hairdresser + other beauty	1,364	470	
Child care	3,183	1098	
Library	19,100	6586	
Community Hall / Hub	1,056	364	
Education related Amenities	Harborough: population per amenity	Harborough: dwellings per amenity	
Nursery	9,550	3293	
Primary School (1 form entry)	2,030	700	
Primary School (2 form entry)	4,060	1400	
Primary School (3 form entry)	6,090	2100	
Secondary School (3 form entry)	9,158	3158	
Secondary School (4 form entry)	12,211	4211	
Secondary School (5 form entry)	15,263	5263	
Secondary School (8 form entry)	24,421	8421	



3.4 The amenity viability assessment provides supporting guidance on the specific amenities that are likely to attract sufficient demand from within the new development to be viable (for commercial amenities) or necessary (for public service amenities). This indicates whether the number of dwellings within acceptable walking distance[5] [6] of a central amenity hub exceeds the number of dwellings the amenity viability assessment suggests are required for the amenity to be tenable. The guidance also indicates if the number of dwellings within acceptable walking distance of a 2nd (and for larger sites a 3rd) amenity hub exceeds the number of dwellings the amenity viability assessment suggests are required for the amenity to be tenable. Finally, the guidance also indicates if the total number of dwellings in the proposed development exceeds the number of dwellings the amenity viability assessment suggests are required for the amenity to be tenable.

3.5 The choice of amenities to include has been informed by the amenity viability guidance, and consultation with local stakeholders with the final selection bounded by the broad constraints of the development proposal for a 4025 home development to include the non-residential uses identified in the Call for Sites Summary para. 15 reproduced below. In addition, an 8 form entry Secondary School with post 16 provision is included in the site to meet HDC Policy requirements for LSGR.

[5] Standard acceptable walkable distance is generally considered to be 800m, or ½ mile. This typically takes approximately 10 minutes to walk, and a 20-minute walking round trip (1,600m total) has been found to be the longest distance a majority of people are willing to walk to meet their daily needs. https://www.sustrans.org.uk/media/10520/walkable-neighbourhoods-report.pdf

[6] Calculation is based on size, density, shape and walk network connectivity of the development site.

Figure 3-1 Para 15 from Q200380 6F February 2024 Call for Sites Summary 020224.pdf

Homes England

Urban&Civic

15. The types and amounts of non-residential uses will be subject to further work but it is currently envisaged that it will include local commercial uses, including shops and services, to meet the day to day needs of residents and support entrepreneurship and business development, combined with public services to meet the needs of the new residents and potentially address gaps in current local provision. It has been assumed as a minimum that two primary schools will be required (1x 2FE and 1x up to 3FE). An allowance of up to 7,500 sqm of floorspace has been assumed in our submission. Higher order needs are assumed to be met by the integration of the land with the existing settlement of Oadby via strong sustainable transport connections.

3.6 **Figure 3-2** presents an extract of the Vision-led Planning Tool relating to this assessment for LSGR illustrating the amenities that have sufficient dwellings within acceptable walk distance or within the development as a whole, and on the far right the amenities that planned to be provided within the site for the purposes of the trip generation assessment for LSGR.

3.7 A second location within the LSGR site included a second convenience store and a second primary school (2 form entry). **Table 3-2** summarises the on-site amenity provision within LSGR included in the subsequent trip generation assessment.

Table 3-2 Summary of planned amenities to be provided in the LSGR site

PRIMARY AMENITY HUB	2nd AMENITY HUB
Convenience store	Convenience store
Take-away	Primary School (2 form entry)
Chemist	
Restaurant	
Café / Coffee Shop	
GP	
Community Hall / Hub	
Nursery	
Primary School (3 form entry)	
Secondary School (8 form entry)	

Figure 3-2 Extract of amenity selection for the LSGR primary amenity hub location

Select Amenities to be Included in Development Site

Number of dwellings within acceptable walking distance from primary amenity hub: 2181 — Tool Estimate / Manually defined

Choose Amenity Data For Harborough: ◉ based on UK Average: ○

Amenity	Number of dwellings needed for viability	Number of dwellings within walking distance of primary hub	Total number of dwellings in site	Viability based on dwellings within walk distance of primary hub	Viability based on total number of dwellings in site	Include amenity in development at primary hub
Shopping related Amenities						
FOOD						
Convenience store	615	2181	4025	☑	☑	☑
Take-away	756	2181	4025	☑	☑	☑
NON-FOOD						
Hardware store	3293	2181	4025	☒	☑	☐
Clothes shop	823	2181	4025	☑	☑	☐
Chemist	1757	2181	4025	☑	☑	☑
Charity shop	2195	2181	4025	☒	☑	☐
Entertainment related activity + Social						
Restaurants	675	2181	4025	☑	☑	☑
Bars / Pubs	506	2181	4025	☑	☑	☐
Café / Coffee Shop	596	2181	4025	☑	☑	☑
Sport participate related activity						
Gym	2250	2181	4025	☒	☑	☐
Outdoor/public facilities	9375	2181	4025	☒	☒	☐
Personal Business related activity						
GP	1464	2181	4025	☑	☑	☑
Dentist	1966	2181	4025	☑	☑	☐
Hairdresser + other beauty	470	2181	4025	☑	☑	☐
Child care	1098	2181	4025	☑	☑	☐
Community Hall / Hub	364	2181	4025	☑	☑	☑
Library	6586	2181	4025	☒	☒	☐

Pupil Yield factor	Education related Amenities			Number of dwellings on site not catered for (-ve numbers indicate excess capacity)			
	Nursery	3293	2181	4025	☒	☑	☑
30	Primary School (1 form entry)	700	2181	1925	☑	☑	☐
	Primary School (2 form entry)	1400	2181	1925	☑	☑	☐
	Primary School (3 form entry)	2100	2181	1925	☑	☑	☑
17.1	Secondary School (3 form en	3158	2181	-4396	☒	☒	☐
	Secondary School (4 form en	4211	2181	-4396	☒	☒	☐
	Secondary School (5 form en	5263	2181	-4396	☒	☒	☐
	Secondary School (8 form en	8421	2181	-4396	☒	☒	☑

4.0 Establishing residents trip making following on-site amenity selection for the LSGR site

4.1 Having selected the mix of amenities to include in the development, analysis is undertaken on the changes in trip making that this on-site amenity provision prompts by comparing the new distances and modes to these on-site amenities with those in the adjusted base data (described in **paragraphs 2.6** to **2.16).**

4.2 Including various amenities within residential developments brings those amenities closer in proximity to where residents live and hence shortens the journeys to those amenities to within walking distance. This has a direct influence on modal share for these trips.

4.3 The LSGR adjusted NTS base data provides the underlying average annual trip making per person including proportions of trips by purpose and mode taking account of the distances to existing external amenities (i.e. when no amenities are included on-site).

4.4 Providing amenities on-site mean more trips for purposes related to those amenities will fall in distance bands 'under 800m' and 'under 1 mile' in length, with the mode share for these distance bands resulting in greater share of walking and less car driving etc. The actual trip proportions within these distance bands being determined by the shape, density, and walk network connectivity of the site combined with the proportions likely to use a particular on-site amenity if one is provided.

4.5 The average proportion of trips per person associated with each amenity has been derived from the NTS data on trip purpose combined with data on proportions of trips for specific purposes within purpose categories (e.g. NTSQ03001; NTSQ03006b; NTSQ01003b). This results in the data presented in **Table 4-1.**

Table 4-1 Proportion of daily trips per person associated with each amenity

	Urban Conurbation		Urban City and Town		Rural Town and Fringe		Rural Village and Isolated	
		+ Other Escort		+ Other Escort		+ Other Escort		+ Other Escort
Shopping	**17.3%**	**3.6%**	**16.9%**	**3.9%**	**17.5%**	**3.0%**	**15.5%**	**3.2%**
FOOD	**8.9%**		**9.0%**		**7.7%**		**7.1%**	
Convenience store	**4.6%**	**1.7%**	**4.7%**	**2.0%**	**4.0%**	**1.3%**	**3.7%**	**1.4%**
Take-away	*0.4%*	**0.2%**	*0.4%*	**0.2%**	*0.4%*	**0.1%**	*0.4%*	**0.1%**
NON-FOOD	**8.4%**		**7.9%**		**9.8%**		**8.4%**	
Hardware store	*0.8%*	**0.3%**	*0.8%*	**0.3%**	*1.0%*	**0.3%**	*0.8%*	**0.3%**
Clothes shop	*1.7%*	**0.6%**	*1.6%*	**0.7%**	*2.0%*	**0.6%**	*1.7%*	**0.6%**
Chemist	*0.8%*	**0.3%**	*0.8%*	**0.3%**	*1.0%*	**0.3%**	*0.8%*	**0.3%**
Charity shop	*1.1%*	**0.4%**	*1.1%*	**0.5%**	*1.3%*	**0.4%**	*1.1%*	**0.4%**
Social outside home	**3.67%**	0.92%	**4.21%**	1.17%	**3.99%**	0.83%	**4.07%**	1.00%
Restaurants	*0.7%*	**0.3%**	*0.8%*	**0.4%**	*0.8%*	**0.2%**	*0.8%*	**0.3%**

	Urban Conurbation		Urban City and Town		Rural Town and Fringe		Rural Village and Isolated	
Bars / Pubs	*0.7%*	**0.3%**	*0.8%*	**0.4%**	*0.8%*	**0.2%**	*0.8%*	**0.3%**
Café / Coffee Shop	*1.0%*	**0.4%**	*1.1%*	**0.5%**	*1.1%*	**0.3%**	*1.1%*	**0.4%**
Sport participate related activity	**1.7%**	0.64%	**1.55%**	0.65%	**2.00%**	0.63%	**2.32%**	0.87%
Gym	*0.8%*	**0.3%**	*0.8%*	**0.3%**	*1.0%*	**0.3%**	*1.2%*	**0.4%**
Outdoor/public facilities	*0.8%*	**0.3%**	*0.8%*	**0.3%**	*1.0%*	**0.3%**	*1.2%*	**0.4%**
Personal Business related activity	**8.5%**	3.23%	**9.17%**	3.85%	**10.74%**	3.38%	**10.91%**	4.05%
GP	2.1%	**0.8%**	2.2%	**0.9%**	2.6%	**0.8%**	2.7%	**1.0%**
Dentist	0.2%	**0.1%**	0.2%	**0.1%**	0.3%	**0.1%**	0.3%	**0.1%**
Hairdresser + other beauty	2.5%	**1.0%**	2.7%	**1.1%**	3.2%	**1.0%**	3.2%	**1.2%**
Child care	0.8%	**0.3%**	0.9%	**0.4%**	1.0%	**0.3%**	1.1%	**0.4%**
Library	0.2%	**0.1%**	0.2%	**0.1%**	0.3%	**0.1%**	0.3%	**0.1%**
Bank	0.6%	**0.2%**	0.7%	**0.3%**	0.8%	**0.2%**	0.8%	**0.3%**
Post Office	0.5%	**0.2%**	0.6%	**0.2%**	0.6%	**0.2%**	0.7%	**0.2%**
Hospital	0.2%	**0.1%**	0.2%	**0.1%**	0.3%	**0.1%**	0.3%	**0.1%**
Community Hall /Hub	1.3%	**0.5%**	1.4%	**0.6%**	1.7%	**0.5%**	1.7%	**0.6%**
Education Related (inc. Escort Education)	**10.0%**	**10.1%**	**8.0%**	**8.4%**	**5.61%**	**6.73%**	**5.35%**	**7.87%**
Nursery		1.9%		1.6%		1.3%		1.5%
Primary School	3.3%	6.3%	2.7%	5.3%	1.9%	4.2%	1.8%	4.9%
Secondary School	6.6%	1.9%	5.3%	1.6%	3.7%	1.3%	3.6%	1.5%

4.6 In reality, not all residents' trips to a particular amenity type will be to an on-site venue even where on-site provision is available. Some residents will choose to use external amenities ahead of local ones in certain circumstances. The decision to use a local amenity is influenced by quality and convenience of product/service provided by the amenity in comparison to available alternatives elsewhere combined with the relative disutility of travelling to those available alternatives. To capture this effect the Tool includes adjustment factors for each type of amenity.

4.7 For some amenities there is negligible variation in product quality and convenience, so the option with the lowest travel disutility is likely to be chosen (adjustment factor 100% - i.e. 100% of resident generated trips choose to use the on-site amenity where provided). However, for certain amenities a proportion of residents will choose to use amenities external to the site, even if an option within walking distance is available on-site.

4.8 Default values of 'adjustment factors' for each amenity are provided in **Table 4-2** on the far left of the table (grey highlight). These can be amended by the user if necessary to better reflect local conditions.

4.9 For residents within standard acceptable walking distance (800m) of an on-site amenity, it is assumed that distance is not a deterrent to use – only individual choice affects decision to use the local amenity, and the default adjustment factor is applied.

4.10 For residents that are more than 800m from an on-site amenity, the assumption is made that use of the on-site amenity will be at half the rate for those living within 800m (i.e. the default adjustment factor is halved) i.e. if 50% of those living within 800m are likely to choose to use the local amenity, then only 25% of those site residents living over 800m away will choose to use the on-site amenity and the remaining 75% will choose to use an amenity of that type external to the site.

4.11 Applying these adjustment factors to the number of trips associated with the relevant on-site amenity enables estimation of realistic levels of amenity focussed residential trips that can be internalised and contained within the development. A summary of the estimated trips per on-site amenity that become internalised is provided in **Figure 4-1.**

Table 4-2 Per person proportion of trips per amenity likely to access local amenity adjusted to take account of individual choice

Default adjustment factor for those <800m from amenity		Urban City and Town	
			+ Other Escort
	Shopping	**19.8%**	
	FOOD	**9.9%**	
80%	Convenience store	**5.3%**	**1.9%**
80%	Take-away	**0.4%**	**0.1%**
	NON-FOOD	**8.7%**	
N/A	Hardware store	**0.0%**	**0.0%**
N/A	Clothes shop	**0.0%**	**0.0%**
100%	Chemist	**0.9%**	**0.3%**
N/A	Charity shop	**0.0%**	**0.0%**
	Social outside home	**5.1%**	0.33%
25%	Restaurants	**0.3%**	**0.1%**
N/A	Bars / Pubs	**0.0%**	**0.0%**
50%	Café / Coffee Shop	**0.7%**	**0.2%**
	Sport participate related activity	**1.5%**	0.00%
N/A	Gym	**0.0%**	**0.0%**
60%	Outdoor/public facilities	**0.0%**	**0.0%**
	Personal Business related activity	**9.1%**	1.30%

Default adjustment factor for those <800m from amenity		Urban City and Town	
			+ Other Escort
100%	GP	**2.2%**	**0.8%**
N/A	Dentist	**0.0%**	**0.0%**
N/A	Hairdresser + other beauty	**0.0%**	**0.0%**
N/A	Child care	**0.0%**	**0.0%**
N/A	Library	**0.0%**	**0.0%**
N/A	Bank	**0.0%**	**0.0%**
N/A	Post Office	**0.0%**	**0.0%**
N/A	Hospital	**0.0%**	**0.0%**
100%	Community Hub	**1.4%**	**0.5%**
	Education Related (inc. Escort Education)	**6.8%**	**6.0%**
90%	Nursery	**0.0%**	**1.1%**
90%	Primary School	**2.0%**	**3.4%**
80%	Secondary School	**0.0%**	**0.0%**

Figure 4-1 Estimated trips per on-site amenity that become internalised for LSGR

	Primary HUB					2nd HUB					3rd HUB					Persons over 800m from any HUE					
			Persons in development within 800m of hub					Persons in development within 800m of hub					Persons in development within 800m of hub			Total persons in development within 800m of Amenity			Persons in development over 800m from Amenity		
	Amenities included in Primary Hub	Proportion of total person trip rate made to local amenity	Total number	as a proportion of total persons in development	Contribution to internal trip rate	Amenities included in 2nd Hub	Proportion of total person trip rate made to local amenity	Total number	as a proportion of total persons in development	Contribution to internal trip rate	Amenities included in 3rd Hub	Proportion of total person trip rate made to local amenity	Total number	as a proportion of total persons in development	Contribution to internal trip rate	Primary Hub	2nd Hub	3rd Hub	Total number	as a proportion of total persons in development	Proportion of trips to Amenity on site
Shopping related Amenities																					
FOOD																					
Convenience store	YES	5.3%	6326	54%	2.9%	YES	5.3%	4927	42%	2.2%	NO	0.0%	0	0%	0.0%	6326	4927	0	420	3.6%	0.10%
Take-away	YES	0.5%	6326	54%	0.3%	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	6326	0	0	5347	45.8%	0.12%
NON-FOOD																0	0	0	NO AMENITY ON SITE	0.0%	0.00%
Hardware store	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	0	0	0	NO AMENITY ON SITE	0.0%	0.00%
Clothes shop	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	0	0	0	NO AMENITY ON SITE	0.0%	0.00%
Chemist	YES	1.1%	6326	54%	0.6%	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	6326	0	0	5347	45.8%	0.26%
Charity shop	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	0	0	0	NO AMENITY ON SITE	0.0%	0.00%
Entertainment related activity + Social outside home																					
Restaurants	YES	0.3%	6326	54%	0.2%	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	6326	0	0	5347	45.8%	0.07%
Bars / Pubs	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	0	0	0	NO AMENITY ON SITE	0.0%	0.00%
Café / Coffee Shop	YES	0.8%	6326	54%	0.4%	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	6326	0	0	5347	45.8%	0.18%
Sport participate related activity																					
Gym	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	0	0	0	NO AMENITY ON SITE	0.0%	0.00%
Outdoor/public facilities	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	0	0	0	NO AMENITY ON SITE	0.0%	0.00%
Personal Business related activity																					
GP	YES	3.2%	6326	54%	1.7%	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	6326	0	0	5347	45.8%	0.73%
Dentist	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	0	0	0	NO AMENITY ON SITE	0.0%	0.00%
Hairdresser + other beauty	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	0	0	0	NO AMENITY ON SITE	0.0%	0.00%
Child care	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	0	0	0	NO AMENITY ON SITE	0.0%	0.00%
Community Hall / Hub	YES	2.0%	6326	54%	1.1%	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	6326	0	0	5347	45.8%	0.47%
Libraray	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	0	0	0	NO AMENITY ON SITE	0.0%	0.00%
Education related Amenities																					
Nursery	YES	1.4%	6326	54%	0.8%	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	6326	0	0	5347	45.8%	0.65%
Primary School	YES	7.1%	6090	52%	3.7%	YES	7.1%	4060	35%	2.5%	NO	0.0%	0	0%	0.0%	6090	4060	0	0	0.0%	0.00%
Secondary School	YES	5.5%	6326	54%	3.0%	NO	0.0%	0	0%	0.0%	NO	0.0%	0	0%	0.0%	6326	0	0	5347	45.8%	2.54%
TOTAL					14.7%					4.7%					0.0%						5.1%

PROPORTION OF RESIDENTIAL TRIPS THAT ARE INTERNALISED DUE TO LOCAL AMENITY PROVISION	24.5%

4.12 **Figure 4-1** shows:

1) the proportion of all trips made by residents living within 800m of the primary amenity hub to each on-site amenity at the primary amenity hub - the left hand table within **Figure 4-1.**

2) the proportion of all trips made by residents living within 800m of the 2nd amenity hub to each on-site amenity at the 2nd amenity hub (the middle table within **Figure 4-1**), and

3) the proportion of all trips made by residents living more than 800m from either amenity hub to each on-site amenity (the right hand table within the **Figure 4-1**).

4.13 For example, 5.2% of all trips made by the new development residents are to the on-site convenience stores:

1) 54% of these trips (2.9%) are made by residents that live within 800m of the primary amenity hub convenience store,

2) a further 42% of these trips (2.2%) are made by residents that live within 800m of the 2nd amenity hub convenience store,

3) 3.6% of residents live more than 800m from either amenity hub and these contribute a further 0.1% (5.2% x 50% distance factor x 3.6% = 0.1%) of resident trips to either on-site convenience store.

4.14 The contribution of residents' trips to on-site amenities that remain internal is calculated in the same manner for all amenities included on site. For LSGR, this results in trips to on-site amenities contributing 24.5% of all daily resident generated trips. i.e. a contribution of 24.5% to the internalisation rate for LSGR.

5.0 Residents Other Trips

5.1 In addition to the trips to specific amenities, there are a number of other trips generated by residents of the site that need to be taken into account. These include:

1) Trips to employment
2) Trips for non-amenity related purposes
3) Trips that can be avoided

Residents Trips to Employment

5.2 The destinations for resident generated trips to employment will be dispersed over a wide area. The NTS base data on trips for commuting purposes for the urban city and town area classification provides a breakdown of modes by trip distance range across all urban city and town areas. The distance distribution of journey to work trips for the closest Output Areas to the site location is obtained from QS702EW 2011 Census Data (below). This is used to tailor the Base NTS data to the local context for LSGR.

Proportion of employment trips under 1 mile from site	5%
Proportion of employment trips 1 to 2 miles from site	6%
Proportion of employment trips 2 to 5 miles from site	40%
Proportion of employment trips 5 to 10 miles from site	27%
Proportion of employment trips 10 to 25 miles from site	15%
Proportion of employment trips 25 to 50 miles from site	4%
Proportion of employment trips 50 to 100 miles from site	3%
Proportion of employment trips more than 100 miles from site	0%
TOTAL	**100%**

5.3 Depending on the nature of the proposed development, there will also likely be some trips to employment that remain internal to the site. This is especially the case on larger sites that also have planned employment within the development proposals.

5.4 The HDC Policy requirements for LSGR require 5 hectares of employment land. However, there is no definition or detail yet agreed in terms of the type of employment that this may incorporate. At this stage it is tentatively assumed this could deliver 400 jobs.

5.5 There will be a number of jobs associated with amenities located within the development (e.g. coffee shop worker, shop assistant, teachers / teaching assistants, etc,). The number of these jobs at any site depends on the number and type of on-site amenities provided, ranging from approx. 5% of dwellings numbers for sites with only basic amenity provision, up to 15% of dwelling numbers for sites with high levels of amenity provision. For LSGR the level of amenity provision is moderate for the population. As a result an initial assumption of 303 jobs related to on-site amenities is applied (7.5% of dwelling numbers).

5.6 General service jobs within the community - carers, gardening, cleaning, etc also contributes to on-site jobs. A conservative assumption on the number of these jobs would be equivalent to 2.5% of the number of dwellings = 101 jobs for LSGR.

5.7 The total estimated number of on-site jobs for LSGR is therefore 804.

5.8 The rate of internalisation of commuting trips varies according to the ratio of on-site jobs relative to the working age population within the development (the Job Density). The greater the Job Density, the higher the rate of commuting trip internalisation is likely to be.

5.9 The job density and internal workforce proportion for every MSOA in England And Wales has been obtained from this Census 2011 dataset[7]. Each MSOA is between 2000 and 4000 dwellings and so is broadly reflective of the scale of large new development sites. From this, plotting the data for each MSOA, a general relationship is derived between job density and internal workforce proportion for each area classification (urban conurbation, urban city and town, rural town and fringe and rural village and dispersed). See **Figure 5-1.**

5.10 This analysis results in the relationship between job density and internalised employment for a new development in the urban city and town area classification of:

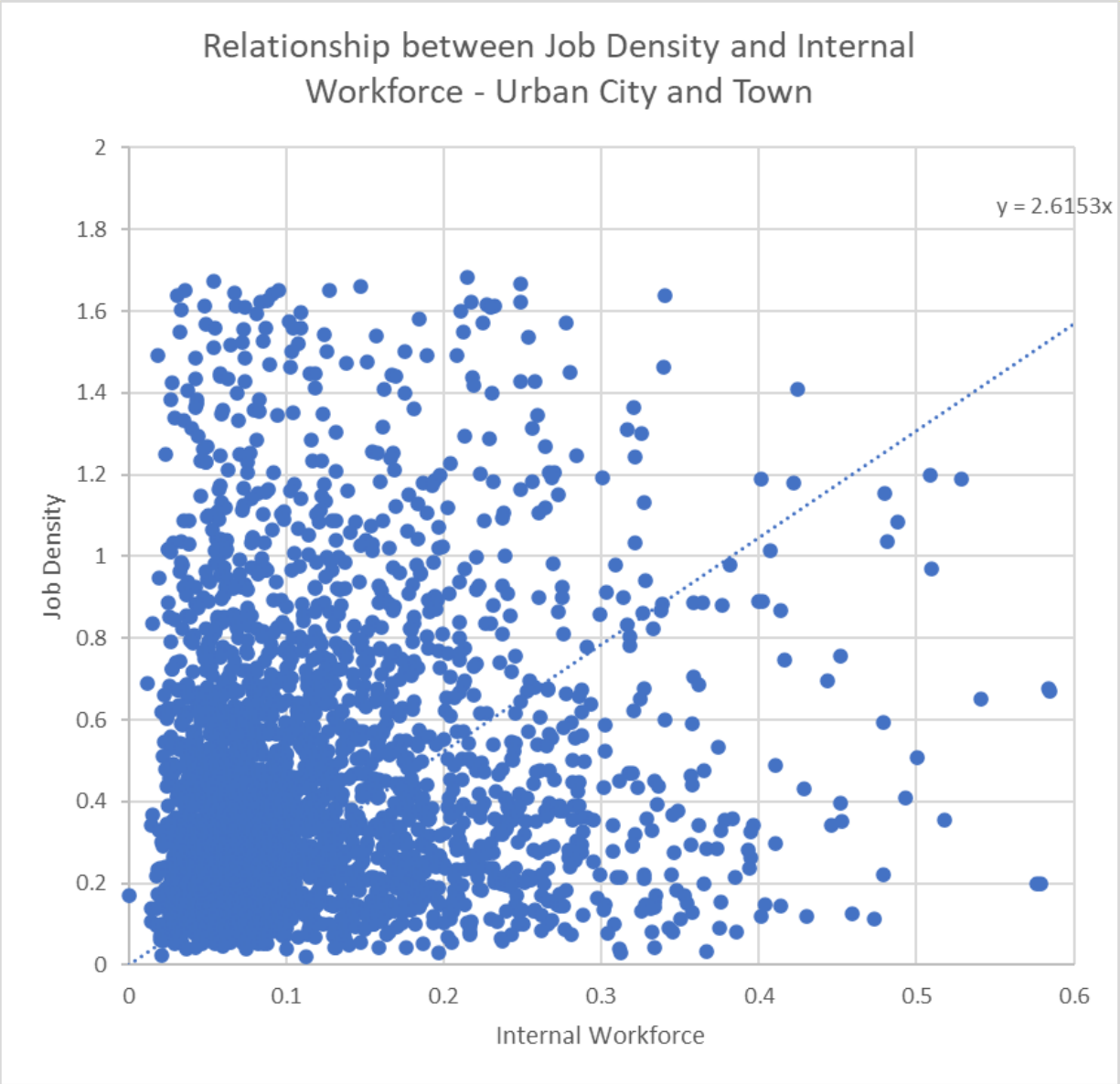
Urban City and Town: Internal Workforce = Job Density / 2.6153

5.11 Applying this relationship to the number of jobs in LSGR we derive an internal workforce proportion of 4.4%.

5.12 With commuting trips making up 14.3% of all trips for the residents of the development, the overall contribution of commuting trips to the internal trip rate is 4.4% x 14.3% = 0.63%

[7] WF01BEW - Location of usual residence and place of work (OA level): https://www.nomisweb.co.uk/census/2011/

Figure 5-1 Scatter plot of job density against internal workforce population for all urban city and town MSOAs



Trips for non-amenity related purposes

5.13 Trips for non-amenity related purposes comprise of trips that are not linked to a specific amenity or for employment. These include business trips, social visits to friends at their homes, entertainment/public events, day trips, holidays and just walk trips.

5.14 The NTS base data (calibrated to reflect site conditions) informs us of the % of trips that are for these purposes and the proportion of these that are under 1 mile. **Table 5-1** presents this information for urban city and town areas.

5.15 If the walking distance from the centre to the edge of the site is one mile, then we can reasonably assume that the proportion of trips that remain internal to the site for these purposes will be at least that suggested by the NTS base data for distances under a mile.

5.16 Where the walking distance from the centre to the edge of the site is greater than 1 mile then the proportion of trips for these purposes that are likely to remain internal will be greater than the NTS base data for distances under a mile and vice versa.

5.17 Hence, where internal distances within the development are likely to be below 1 mile or above 1 mile, a pro-rata adjustment is made to the contribution to internal trip rate for these 'other' non-amenity / non employment trip purposes.

5.18 Applying this to the LSGR site we find the contribution to internal trip rate for non-amenity related purposes as shown in the far right column in **Table 5-1.**

5.19 The overall contribution to the internal trip rate for these non-amenity related trip purposes for LSGR is 8.7%

Table 5-1 Summary of trips for non-amenity related purposes in urban city and town areas

	Urban City and Town		
Non-amenity related purpose	% of total trips	% of this under 1 mile	Contribution to Internal Trip Rate
Business	2.6%	11.5%	0.3%
Social visit friend home	6.2%	16.4%	1.2%
Entertainment/public event	5.9%	16.5%	1.1%
Day trip	3.1%	3.0%	0.1%
Holiday	0.9%	13.4%	0.1%
Just Walk	9.1%	55.6%	5.8%

Trips that can be avoided

5.20 Certain trips that remain external to the development site can be avoided through remote or on-line service provision. There are three main areas where this can have a noticeable effect on the proportion of external trips.

1) Working from Home removing the need to travel to work.

2) More on-line / virtual meetings removing the need for some business travel.

3) On-line shopping and home delivery for supermarket food shopping and for non-food items.

Working from Home

5.21 Job growth in future is expected to occur in higher skilled / professional sectors that are more office based, and therefore offer more potential for home based working. It is therefore expected that this continued growth in professional jobs in the future will result in continued increases in home working. To account for this continued growth in working from home, the user can enter the anticipated % point change per annum in working from home rates between current time up until the planned build year. For LSGR an annual increase of 0.25% points is applied up until the planned build completion

year of 2046, resulting in 5.75% less commuting trips in 2046 compared to the 2023 NTS base year as a result of increased working from home. This equates to 0.79% of all trips that are avoided due to WfH increases by 2046.

More Virtual Business Meetings

5.22 Although business trips account for only around 3% of total trips, 91% of these are over 1 mile in length and so would likely be external to the site.

5.23 Due to the increased use and acceptance of virtual meetings replacing some physical meetings during and post Covid, it can be expected that this trend will continue and indeed increase as technology advances and office based working accounts for larger proportions of the workforce[8].

5.24 For LSGR it is assumed that there will be 30% fewer business trips in 2046 compared to the 2023 NTS base year as a result of increased virtual meetings relative. NTS data informs us that business trips account for 2.6% of all trips, and 11.5% of these are internalised (see **Table 5-1**), there are 88.5% of business trips remaining external. If 30% of these trips are avoided, this results in 0.7% (=2.6% x 88.5% x 30%) of all external trips avoided due to increased virtual meetings and hence a 0.7% point increase to the internalisation rate.

Home Delivery of Shopping

5.25 Shopping trips to supermarkets and the majority of non-food shopping trips will remain external to the development site. These make up a substantial proportion of all trips. An increasing number of these trips are being avoided through on-line ordering combined with home delivery.

5.26 Post Covid, the extent of Supermarket shopping that is now home delivery has increased from 7.7% in 2019 to 15.7% in 2023[9].

5.27 It is expected that these levels will continue to increase as more retailers make more home delivery slots available. Around 80% of UK consumers say they would do more food shopping online if the experience was improved, and 28% plan to shop mostly online within the next two years[10].

5.28 Based on these trends it is assumed for LSGR that a 30% of supermarket trips will be avoided by the planned year of build completion due to increased home delivery relative to 2023 base year. NTS data informs us that supermarket food shopping trips account for 2.9% of all trips, and 0% of these are internalised. If 30% of these trips are avoided, this results in 0.88% (=2.9% x 30%) of all external trips avoided due to increased home delivery of food shopping and hence a 0.88% point increase to the internalisation rate.

5.29 For non-food shopping the levels of on-line shopping with home delivery have also risen since 2019 from 30% to 42% in 2023 with the expectation that it will rise to 50% by 2025[11]. It can be expected that this trend will continue and indeed increase as technology advances and on-line shopping

[8] https://summix.com/the-future-of-work-report#:~:text=The%20Future%20of%20Work%20report%20provides%20a%20comprehensive%20data%2Dled,deliver%20a%20positive%20human%20impact.

[9] https://pdf.euro.savills.co.uk/uk/commercial-retail-uk/spotlight-uk-grocery---january-2022.pdf

[10] https://www.chargedretail.co.uk/2022/06/09/over-half-of-uk-consumers-now-purchase-groceries-online/

[11] https://www.retailgazette.co.uk/blog/2022/02/half-of-non-food-sales-will-be-made-online-by-2025/

channels become more widespread as more retailers provide this option and more of the population are daily internet users.

5.30 Based on these trends it is assumed for LSGR that a 30% of non-food shopping trips will be avoided by the planned year of build completion due to increased home delivery relative to 2023 base year. NTS data informs us that non-food shopping trips account for 7.9% of all trips (see **Table 4-2**), and 11.4% of these (0.9% of all trips) are internalised (see Figure 4.1). There are therefore 88.6% of non-food shopping trips remaining external. If 30% of these trips are avoided, this results in 2.11% (=7.9% x 88.6% x 30%) of all external trips avoided due to increased home delivery of non-food shopping and hence a 2.11% point increase to the internalisation rate.

6.0 Residential Trip Generation Results Following Placemaking Interventions

6.1 The trip generation rate from the residential development is estimated by combining the results of the analysis described in **Section 4** and **5** and is presented in **Table 6-1** for daily trips. This shows the contribution to internalised trips generated to on-site amenities, to on-site employment, for non-amenity or employment related trip making, and from avoided trips related to increasing levels of working from home and virtual business meetings as well as on-line shopping/home delivery. This results in an average daily internalisation rate of 35.1% for residential trip generation from the proposed LSGR site.

Table 6-1 Daily residential trip generation internalisation rate for LSGR

	contribution to internal trip rate										
Internalisation rate	Internal trip rate to on-site amenities		Internal Commuting trips		'Other' trip purposes		Working from Home and Virtual Business trip avoidance		Shopping home delivery trip avoidance		TOTAL Internal Trip Rate
24 HOUR DATA	24.5%		0.63%		8.71%		1.5%		2.99%		38.3%

6.2 **Figure 6-1** presents the breakdown of daily trips by trip purpose for LSGR, highlighting the internal trip rate and external trip rate for each purpose based on the amenity, non-amenity and employment analysis described above.

6.3 The distribution of the LSGR adjusted NTS annual trips per person to 24-hour data and then to hourly time periods is undertaken by finding average weekday daily trips [applying NTS0504b: Average number of trips (trip rates) by day of the week and purpose] and then finding hourly person trips within weekdays [applying NTS0502: Trip start time by trip purpose (Monday to Friday only)].

6.4 This allows estimation of the breakdown of internal and external trips by trip purpose and time of day for LSGR. **Figure 6-2** presents this breakdown for the 08:00-09:00 morning peak hour and **Figure 6-3** presents the breakdown for 17:00-18:00 evening peak hour. Equivalent information is also available for every hour in the 24 hour day.

6.5 **Table 6-2** gives a summary of the internalisation rate during each of the morning peak hours and each of the evening peak hours.

Table 6-2 Internalisation rate for peak hours of the day

07:00-10:00 a.m. PEAK PERIOD	42.2%
07:00-08:00 hrs.	31.4%
08:00-09:00 hrs.	52.7%
09:00-10:00 hrs.	31.2%

16:00-19:00 p.m. PEAK PERIOD	26.2%
16:00-17:00 hrs.	30.0%
17:00-18:00 hrs.	23.9%
18:00-19:00 hrs.	24.0%

Figure 6-1 Daily trips by trip purpose for LSGR including internal / external split

	Proportion of total trips by purpose	Internalisation rate by purpose	Proportion of total trip trips that are internal	24 hr trip rate per dwelling (internal trips)	Avoided Trips	External rate by purpose	Proportion of total trip trips that are external	24 hr trip rate per dwelling (external trips)
Shopping	20.8%	36%	6.5%	0.529	3.0%	64%	11.4%	0.933
Education	16.4%	80%	13.2%	1.081	0.0%	20%	3.3%	0.268
Commuting trips	14.3%	5%	0.6%	0.051	0.8%	95%	12.9%	1.056
Personal Business trips	13.0%	31%	4.0%	0.331	0.0%	69%	9.0%	0.737
Social outside home	5.4%	16%	0.8%	0.069	0.0%	84%	4.5%	0.373
Sport Participate	2.2%	0%	0.0%	0.000	0.0%	100%	2.2%	0.181
Business	2.6%	18%	0.3%	0.029	0.7%	82%	1.6%	0.130
Social visit family / friends in their home	6.2%	19%	1.2%	0.096	0.0%	81%	5.0%	0.410
Entertainment / public event	5.9%	19%	1.1%	0.092	0.0%	81%	4.8%	0.394
Day trip	3.1%	3%	0.1%	0.009	0.0%	97%	3.0%	0.248
Holiday	0.9%	15%	0.1%	0.011	0.0%	85%	0.7%	0.060
Just Walk	9.1%	64%	5.8%	0.478	0.0%	36%	3.3%	0.268
	100.0%		33.8%	2.776	4.5%		61.7%	5.060

Figure 6-2 Morning peak hour (08:00-09:00) trips by trip purpose for LSGR including internal / external split

	Proportion of total trips 08:00-09:00 by purpose	Internalisation rate by purpose	Proportion of total trips 08:00-09:00 that are internal	08:00-09:00 trip rate per dwelling (internal trips)	Avoided Trips	External rate by purpose	Proportion of total trip trips 08:00-09:00 that are external	08:00-09:00 trip rate per dwelling (external trips)
Shopping	6.7%	36%	2.1%	0.019	1.0%	64%	3.7%	0.034
Education	53.3%	80%	42.7%	0.399	0.0%	20%	10.6%	0.099
Commuting trips	16.2%	5%	0.7%	0.007	0.9%	95%	14.6%	0.137
Personal Business trips	10.0%	31%	3.1%	0.029	0.0%	69%	6.9%	0.064
Social outside home	1.4%	16%	0.2%	0.002	0.0%	84%	1.2%	0.011
Sport Participate	0.6%	0%	0.0%	0.000	0.0%	100%	0.6%	0.006
Business	2.4%	18%	0.3%	0.003	0.6%	82%	1.4%	0.013
Social visit family / friends in their home	1.1%	19%	0.2%	0.002	0.0%	81%	0.9%	0.008
Entertainment / public event	1.6%	19%	0.3%	0.003	0.0%	81%	1.3%	0.012
Day trip	1.6%	3%	0.1%	0.001	0.0%	97%	1.5%	0.014
Holiday	0.4%	15%	0.1%	0.001	0.0%	85%	0.4%	0.003
Just Walk	4.6%	64%	3.0%	0.028	0.0%	36%	1.7%	0.015
	100.0%		52.7%	0.492	2.5%		44.8%	0.418

Figure 6-3 Evening peak hour (17:00-18:00) trips by trip purpose for LSGR including internal / external split

	Proportion of total trips 17:00-18:00 by purpose	Internalisation rate by purpose	Proportion of total trips 17:00-18:00 that are internal	17:00-18:00 trip rate per dwelling (internal trips)	Avoided Trips	External rate by purpose	Proportion of total trip trips 17:00-18:00 that are external	17:00-18:00 trip rate per dwelling (external trips)
Shopping	17.3%	36%	5.4%	0.033	2.5%	64%	9.5%	0.058
Education	5.1%	80%	4.1%	0.025	0.0%	20%	1.0%	0.006
Commuting trips	26.2%	5%	1.1%	0.007	1.4%	95%	23.6%	0.146
Personal Business trips	12.7%	31%	3.9%	0.024	0.0%	69%	8.8%	0.054
Social outside home	7.4%	16%	1.1%	0.007	0.0%	84%	6.2%	0.038
Sport Participate	3.0%	0%	0.0%	0.000	0.0%	100%	3.0%	0.019
Business	2.6%	18%	0.3%	0.002	0.7%	82%	1.6%	0.010
Social visit family / friends in their home	6.7%	19%	1.3%	0.008	0.0%	81%	5.4%	0.033
Entertainment / public event	8.1%	19%	1.5%	0.009	0.0%	81%	6.6%	0.041
Day trip	2.6%	3%	0.1%	0.001	0.0%	97%	2.5%	0.016
Holiday	0.7%	15%	0.1%	0.001	0.0%	85%	0.6%	0.004
Just Walk	7.6%	64%	4.9%	0.030	0.0%	36%	2.7%	0.017
	100.0%		23.9%	0.148	4.6%		71.5%	0.441

Mode Share Results Summary

6.6 The mode share by trip purpose is established based on distances from the site to the amenities associated with each purpose. Where on-site amenities are included, the distances typically fall within a mile and the purpose specific NTS mode share data for distance range '< 0.5 mile' and '0.5-1.0 miles' are applied in proportion to the numbers of dwellings within these distance bands of the amenity location. Where amenities are not included on-site, then the distances are based on the proximity of the site to existing external amenity locations (**Table 2-3**) and the proportions of trips and mode share associated with these proportions is calibrated to reflect those distance ranges (method described in **Paragraphs 2.13** to **2.16**).

6.7 This fine grained analysis of trips by amenity / purpose and distance is applied to the proportions of trips by each purpose by time of day to establish the mode share for internal trips and mode share for remaining external trips for each analysed time period. **Figure 6-4** presents the daily mode share summary also including mode share for internal trips and mode share for remaining external trips. **Figure 6-5** presents the equivalent information for the 08:00-09:00 morning peak hour and **Figure 6-6** the equivalent information for the 17:00-18:00 evening peak hour.

Figure 6-4 LSGR Modal Share Summary: 24 HOUR data

	Internal trips		External Trips		ALL TRIPS
	as % of internal trips	as % of ALL trips	as % of external trips	as % of ALL trips	
Walk	**84.3%**	**28.5%**	**17.8%**	**11.0%**	**39.5%**
Bicycle	1.5%	0.5%	**2.4%**	**1.5%**	**2.0%**
Car/van driver	**8.1%**	**2.7%**	**51.6%**	**31.8%**	**34.6%**
Car/van passenger	**5.6%**	**1.9%**	**25.0%**	**15.4%**	**17.3%**
Motorcycle	0.0%	0.0%	0.3%	0.2%	0.2%
Other private transport	0.0%	0.0%	0.0%	0.0%	0.0%
Bus in London	0.0%	0.0%	0.0%	0.0%	0.0%
Other local bus	0.2%	0.1%	**1.6%**	**1.0%**	**1.0%**
Non-local bus	0.0%	0.0%	0.0%	0.0%	0.0%
London Underground	0.0%	0.0%	0.0%	0.0%	0.0%
Surface Rail	0.0%	0.0%	0.0%	0.0%	0.0%
Taxi / minicab	0.1%	0.0%	**1.1%**	**0.7%**	**0.7%**
Other public transport	0.1%	0.0%	**0.2%**	**0.1%**	**0.2%**
		33.8%		61.7%	95.5%
Avoided trips		4.5%			4.5%
		38.3%			100%

Figure 6-5 LSGR Modal Share Summary: 08:00-09:00 morning peak hour

	Internal trips		External Trips		ALL TRIPS
	as % of internal trips	as % of ALL trips	as % of external trips	as % of ALL trips	
Walk	**83.8%**	**44.2%**	**18.0%**	**8.05%**	**52.3%**
Bicycle	**1.9%**	1.0%	**2.9%**	**1.29%**	**2.3%**
Car/van driver	**6.8%**	**3.6%**	**51.4%**	**23.03%**	**26.6%**
Car/van passenger	**6.9%**	**3.6%**	**23.5%**	**10.54%**	**14.2%**
Motorcycle	**0.0%**	0.0%	**0.3%**	0.14%	0.1%
Other private transport	**0.0%**	0.0%	**0.0%**	0.00%	0.0%
Bus in London	**0.0%**	0.0%	**0.0%**	0.00%	0.0%
Other local bus	**0.4%**	0.2%	**2.2%**	**0.98%**	**1.2%**
Non-local bus	**0.0%**	0.0%	**0.0%**	0.01%	0.0%
London Underground	**0.0%**	0.0%	**0.0%**	0.00%	0.0%
Surface Rail	**0.0%**	0.0%	**0.0%**	0.00%	0.0%
Taxi / minicab	**0.0%**	0.0%	**0.9%**	**0.43%**	**0.4%**
Other public transport	**0.2%**	0.1%	**0.7%**	**0.30%**	**0.4%**
		52.7%		44.8%	97.5%
Avoided trips		2.5%			2.5%
		55.2%			100.0%

Figure 6-6 LSGR Modal Share Summary: 17:00-18:00 evening peak hour

	Internal trips		External Trips		ALL TRIPS
	as % of internal trips	as % of ALL trips	as % of external trips	as % of ALL trips	
Walk	**84.0%**	**20.1%**	**15.5%**	**11.07%**	**31.1%**
Bicycle	**1.4%**	0.3%	**2.6%**	**1.85%**	**2.2%**
Car/van driver	**9.0%**	**2.2%**	**54.8%**	**39.18%**	**41.3%**
Car/van passenger	**5.3%**	**1.3%**	**23.6%**	**16.90%**	**18.2%**
Motorcycle	**0.0%**	0.0%	**0.4%**	0.26%	0.3%
Other private transport	**0.0%**	0.0%	**0.0%**	0.00%	0.0%
Bus in London	**0.0%**	0.0%	**0.0%**	0.00%	0.0%
Other local bus	**0.2%**	0.0%	**1.7%**	**1.23%**	**1.3%**
Non-local bus	**0.0%**	0.0%	**0.0%**	0.03%	0.0%
London Underground	**0.0%**	0.0%	**0.0%**	0.00%	0.0%
Surface Rail	**0.0%**	0.0%	**0.0%**	0.00%	0.0%
Taxi / minicab	**0.2%**	0.0%	**1.3%**	**0.91%**	**1.0%**
Other public transport	**0.1%**	0.0%	**0.1%**	**0.06%**	**0.1%**
		23.9%		71.5%	95.4%
Avoided trips		4.6%			4.6%
		28.5%			100.0%

7.0 Establishing trip making following mobility interventions analysis for the LSGR site

7.1 In addition to the placemaking vision to maximise amenity provision within the new development, there are a number of possible mobility interventions that can also form part of the vision.

7.2 The Mobility components of the Vision aim to SHIFT journeys away from private car by offering an attractive range of active or shared, low carbon options for external trips that are attractive to residents, workers, and visitors and will help make sustainable mobility behaviour the natural first choice for the majority of journey types.

7.3 The placemaking analysis, detailed in Sections 4,5 and 6, provides intelligence on the extent to which different trip purposes continue to contribute car trips to the external road network. This allows a more focussed and targeted design of mobility interventions to be considered in consultation with local stakeholders.

7.4 Within the Vision-led Planning Tool, a range of mobility intervention strategies can be defined that further reduce car use, shifting to public transport, cycling and carpooling for remaining external trips or increased walking for internal trips. The impacts of these strategies are calculated for a defined level of ambition / expected shift.

7.5 The possible mobility interventions for LSGR have been identified in the work of *iTransport* when determining the mobility strategy for the site. These are summarised below along with the definition of these interventions within the Vision-led Planning Tool to reflect the additional impact they will have on the trip generation analysis.

LSGR Bus Interventions

7.6 For the LSGR site with selected on-site amenities, the trip generation assessment established that car driver trips comprise 61% of all trips in 2-10 mile range while bus trips are likely to comprise 2% of all trips in 2-10 mile range. Based on the planned bus strengthening measures suggested by *iTransport*, (outlined in **Figure 7-1**), a 15% point shift in car driver to bus journeys in the 2-10 mile range is expected resulting in an overall bus mode share increase from 1.7% to 5.3% per day.

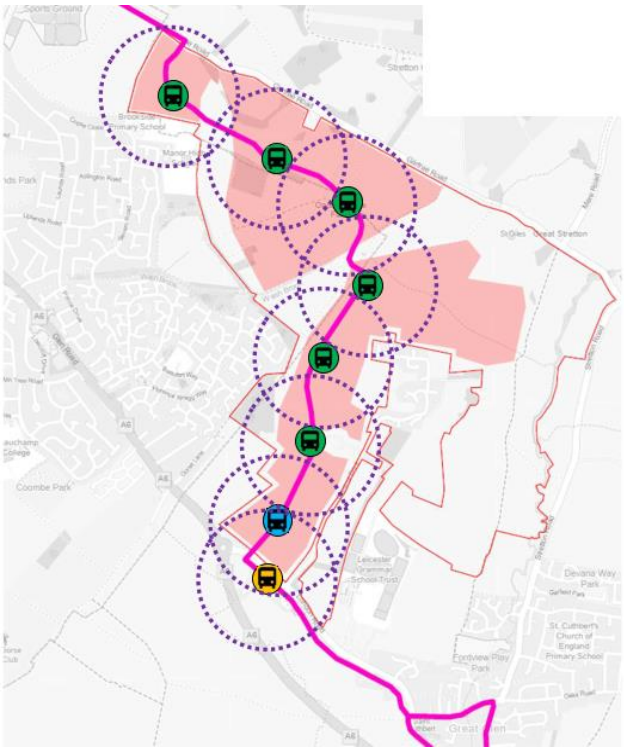
Figure 7-1 Bus Enhancements for LSGR suggested by *iTransport*

Potential Bus Interventions – New Bus Route

i-Transport

Engagement with local bus operators (Arriva, Vectare and Centrebus) has been undertaken and the following agreed in principle:

- A new bus service is required.
- Suggested linear route between Great Glen and Leicester, through site via London Road and Gartree Road.
- Monday-Friday 5.30am to 11.30pm, Saturday 7.30am to 11.30pm, Sunday 9am to 9pm
- Service every 15 minutes
- Provide new high-quality interchange to existing bus services to Market Harborough and other destinations to the southeast (X3 & X7).



Existing bus stop

Proposed bus interchange with medium-sized mobility hub (e.g. cycle/scooter hire and/or parking, car club, EV chargers)

Proposed bus stop with mini-mobility hub (e.g. cycle/scooter hire and/or parking)

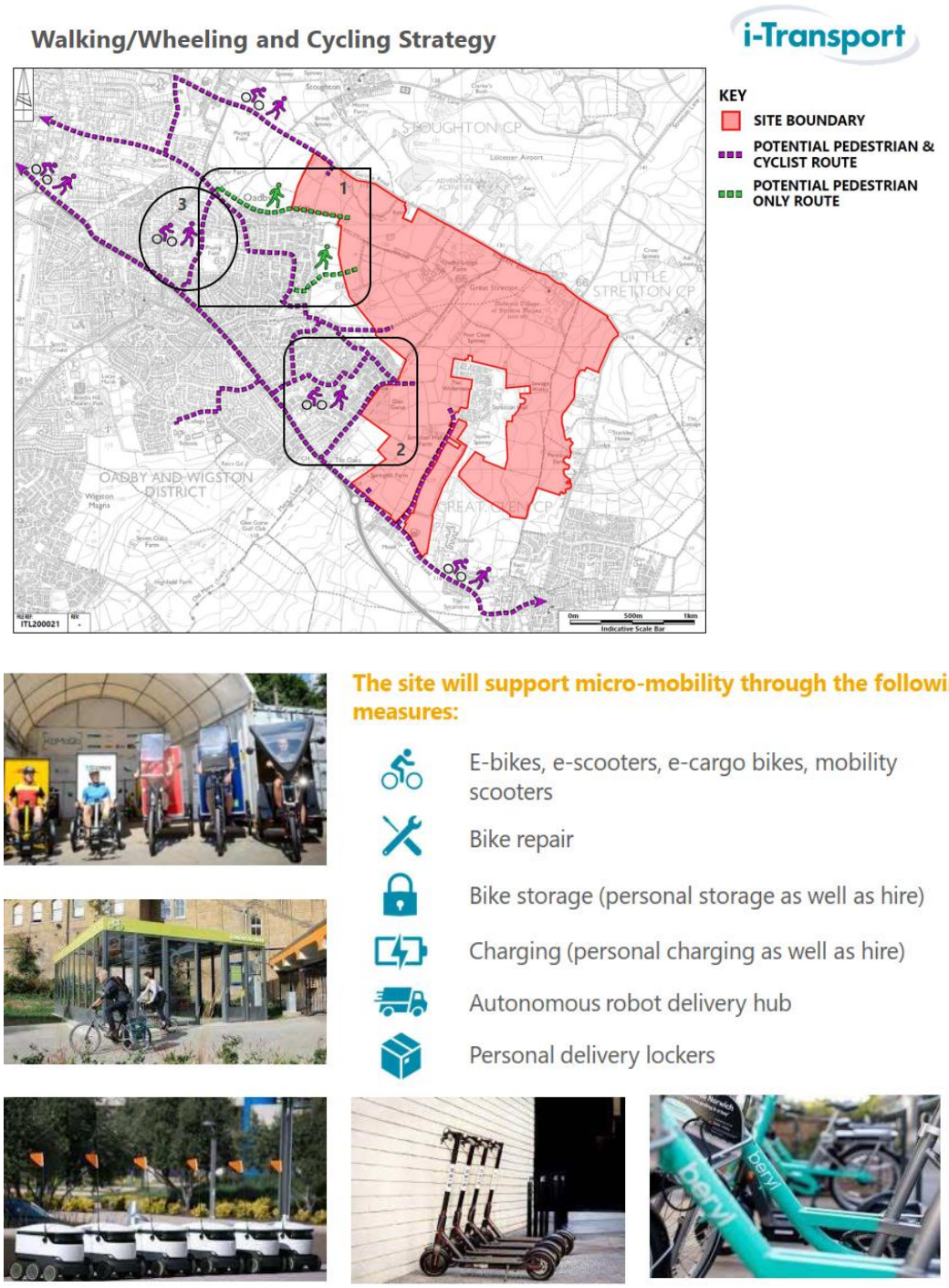
400m walking radius

Proposed new bus route through the site

LSGR Cycling Interventions

7.7 For the LSGR site with selected on-site amenities, the trip generation assessment established that car driver trips comprise 45% of all external trips under 5 miles in length while cycle trips comprise 3% of all external trips under 5 miles. Based on the planned cycle infrastructure improvements (outlined in **Figure 7-2**), a 5% point shift in car driver to cycle journeys in the < 5 mile range is expected resulting in an overall cycle mode share increase from 2.2% to 4.0% per day.

Figure 7-2 Cycle Enhancements for LSGR suggested by *iTransport*

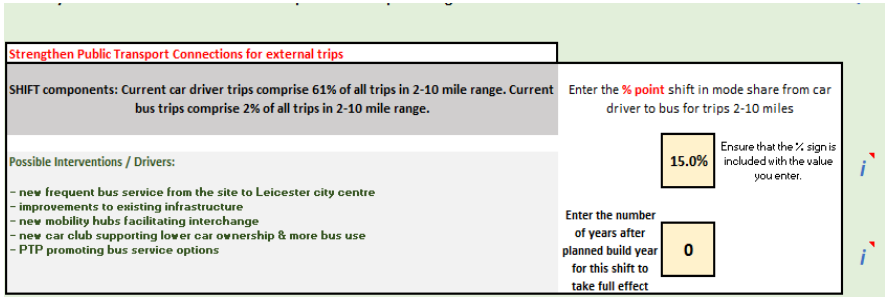


LSGR Pedestrian Interventions

7.8 For the LSGR site with selected on-site amenities, the trip generation assessment established that walking accounts for 61% of all internal trips over 0.5 miles in length. Based on the planned improvements to walking infrastructure within the site (outlined in **Figure 7-3**), an expected increase of 15% points is assumed bringing walk mode share for internal trips over 0.5 miles up to 76%.

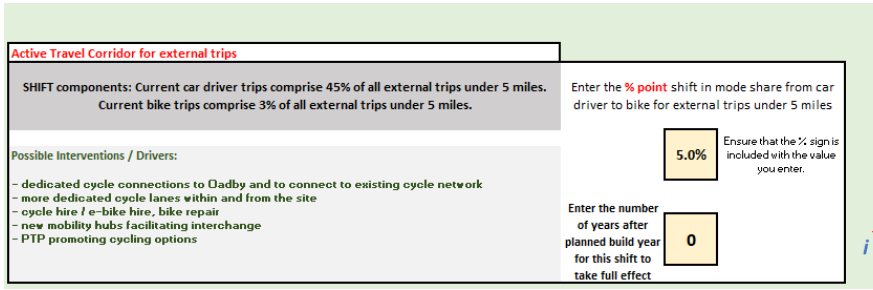
Figure 7-3 Pedestrian Enhancements for LSGR suggested by *iTransport* within the site

Figure 7-4 Impacts on external mode share from planned bus improvements



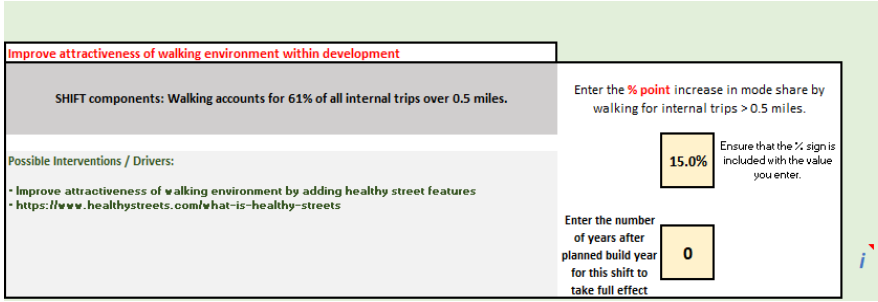
	Previous External Modal Share (24 Hr)	Updated External Modal Share (24 Hr)	0700-1000 Previous External Modal Share	0700-1000 Updated External Modal Share	1600-1900 Previous External Modal Share	1600-1900 Updated External Modal Share
Walk	17.8%	17.8%	17.2%	17.2%	16.4%	16.3%
Bicycle	2.4%	2.4%	2.8%	2.8%	2.5%	2.5%
Car/van driver	51.6%	44.6%	53.7%	46.3%	53.2%	45.7%
Car/van passenger	25.0%	25.0%	22.5%	22.6%	24.6%	24.6%
Motorcycle	0.3%	0.3%	0.3%	0.3%	0.3%	0.3%
Other private transport	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Bus in London	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Other local bus	1.6%	8.6%	2.0%	9.3%	1.6%	9.1%
Non-local bus	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
London Underground	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Surface Rail	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Taxi / minicab	1.1%	1.1%	1.1%	1.1%	1.3%	1.3%
Other public transport	0.2%	0.2%	0.4%	0.4%	0.1%	0.1%

Figure 7-5 Impacts on external mode share from planned cycling improvements



	Previous External Modal Share (24 Hr)	Updated External Modal Share (24 Hr)	0700-1000 Previous External Modal Share	0700-1000 Updated External Modal Share	1600-1900 Previous External Modal Share	1600-1900 Updated External Modal Share
Walk	17.8%	17.8%	17.2%	17.2%	16.4%	16.3%
Bicycle	2.4%	5.8%	2.8%	6.2%	2.5%	5.8%
Car/van driver	51.6%	48.2%	53.7%	50.2%	53.2%	49.9%
Car/van passenger	25.0%	25.0%	22.5%	22.6%	24.6%	24.6%
Motorcycle	0.3%	0.3%	0.3%	0.3%	0.3%	0.3%
Other private transport	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Bus in London	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Other local bus	1.6%	1.6%	2.0%	2.0%	1.6%	1.6%
Non-local bus	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
London Underground	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Surface Rail	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Taxi / minicab	1.1%	1.1%	1.1%	1.1%	1.3%	1.3%
Other public transport	0.2%	0.2%	0.4%	0.4%	0.1%	0.1%

Figure 7-6 Impacts on internal mode share from planned pedestrian improvements



	Previous Internal Modal Share (24 Hr)	Updated Internal Modal Share (24 Hr)	0700-1000 Previous Internal Modal Share	0700-1000 Updated Internal Modal Share	1600-1900 Previous Internal Modal Share	1600-1900 Updated Internal Modal Share
Walk	84.3%	86.6%	84.2%	87.0%	84.4%	89.1%
Bicycle	1.5%	1.5%	1.8%	1.8%	1.4%	1.4%
Car/van driver	8.1%	6.8%	7.2%	5.7%	8.6%	5.8%
Car/van passenger	5.6%	4.6%	6.3%	4.9%	5.2%	3.3%
Motorcycle	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Other private transport	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Bus in London	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Other local bus	0.2%	0.2%	0.3%	0.3%	0.2%	0.2%
Non-local bus	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
London Underground	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Surface Rail	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Taxi / minicab	0.1%	0.1%	0.1%	0.1%	0.2%	0.2%
Other public transport	0.1%	0.1%	0.2%	0.2%	0.1%	0.1%

8.0 Summary of LSGR Residential Trip Generation

8.1 This section summarises the results from the residential trip generation analysis described in **Sections 2** to **7**.

8.2 **Table 8-1** shows the overall mode share without and with the planned on-site amenities and trip avoidance forecasts.

1) The left hand column presents the estimated mode share from the LSGR site if no on-site amenities, trip avoidance or mobility interventions were included. This is termed the Worst Case Scenario. **Figure 8-1** presents this data as a pie chart.
2) The middle column presents the estimated mode share from the LSGR site if the planned on-site amenities are included and trip avoidance forecasts are applied (see **Sections 3,4,5** and **6**) but no additional mobility interventions are included. **Figure 8-2** presents this data as a pie chart.
3) The third column presents the estimated mode share from the LSGR site if the planned on-site amenities are included and the additional mobility interventions are included (see **Section 7). Figure 8-3** presents this data as a pie chart.
4) The final column presents the mode share if walking trips that are made just for fitness / leisure are removed from the analysis.

Table 8-1 Summary of residential trip generation mode share

	Modal Share without placemaking and mobility interventions	Modal Share following placemaking vision interventions	Modal Share following placemaking and mobility interventions	Final Modal Share excluding walking trips for leisure / fitness
Walk	24.4%	39.1%	39.7%	33.6%
Bicycle	2.2%	2.0%	4.0%	4.4%
Car/van driver	45.9%	34.8%	28.4%	31.3%
Car/van passenger	24.1%	17.4%	17.0%	18.7%
Motorcycle	0.2%	0.2%	0.2%	0.2%
Other private transport	0.0%	0.0%	0.0%	0.0%
Bus in London	0.0%	0.0%	0.0%	0.0%
Local bus	1.7%	1.1%	5.3%	5.8%
Non-local bus	0.0%	0.0%	0.0%	0.0%
London Underground	0.0%	0.0%	0.0%	0.0%
Surface Rail	0.0%	0.0%	0.0%	0.0%
Taxi / minicab	0.9%	0.8%	0.7%	0.8%
Other public transport	0.5%	0.2%	0.2%	0.2%
Additional avoided trips	0.0%	4.5%	4.5%	4.9%
Total	100%	100%	100%	100%

Figure 8-1 Mode share for LSGR site with no on-site amenities or mobility interventions (worst case scenario)

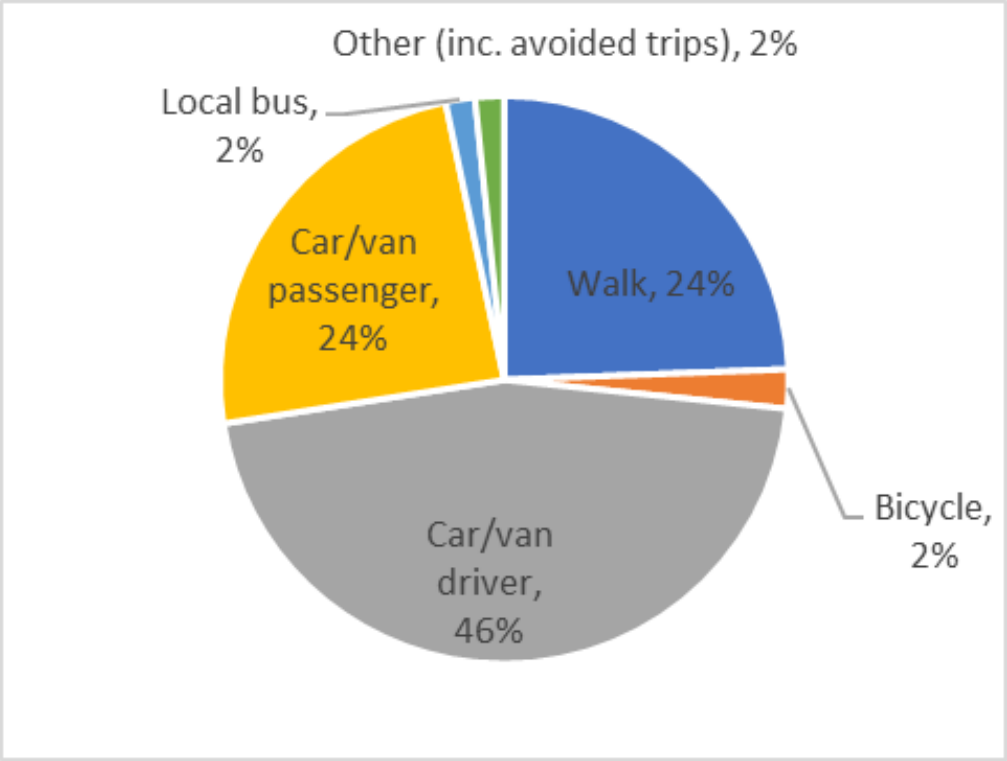


Figure 8-2 Mode share for LSGR site with planned on-site amenities and trip avoidance forecasts but no mobility interventions

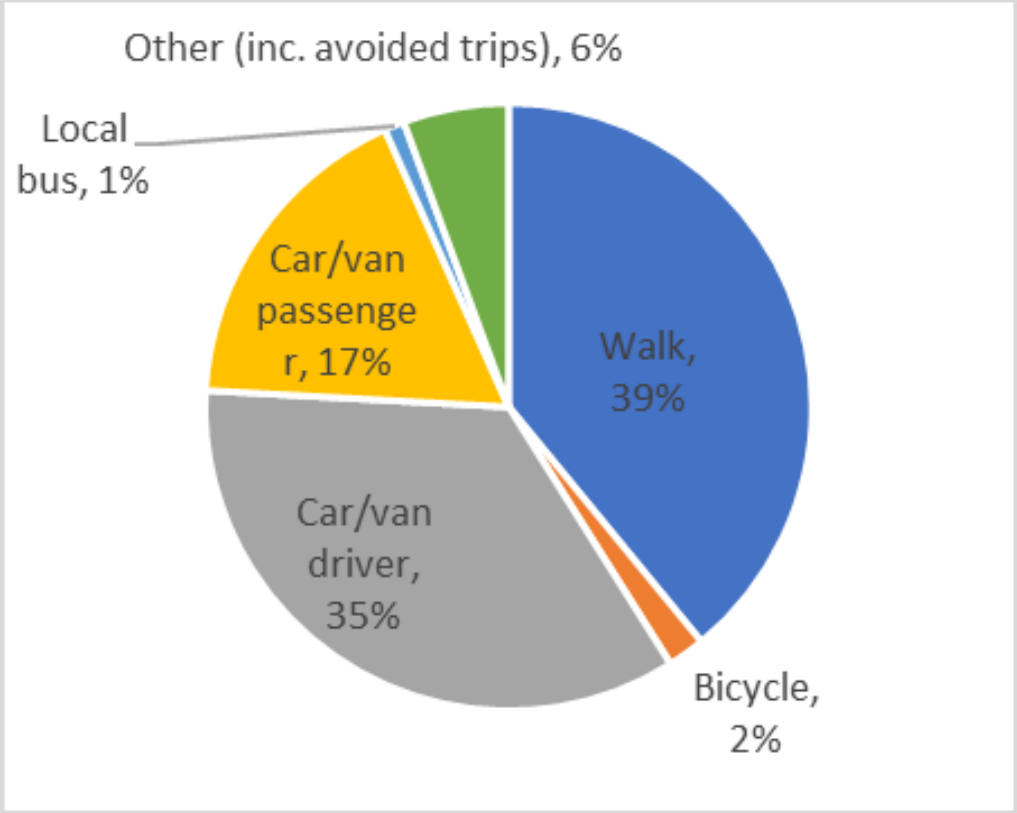


Figure 8-3 Mode share for MH2 site with planned on-site amenities and additional mobility interventions

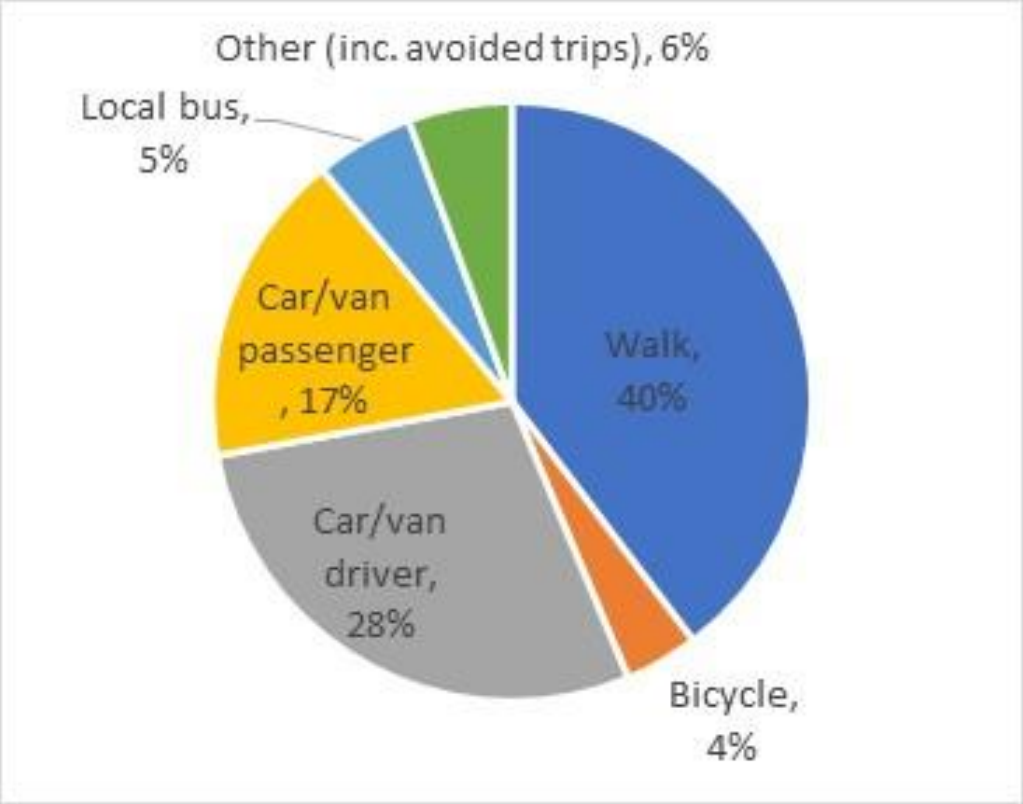


Table 8-2 Overall Residential Trips Generated from the LSGR Site for the Three Scenarios

	24 Hour Trip Rate per Dwelling	24 Hour Total Trips for development site (including avoided trips)	Internal Trips		External Trips		Avoided Trips	
			%	Internal Trips Generated from Site	%	External Trips Generated from Site	%	External Trips Generated from Site
All Trips for new development with no interventions	8.20	32975	8.7%	2874	91.3%	30101	0.0%	0
All Trips following placemaking vision interventions	7.84	33018	33.8%	11023	61.7%	20516	4.5%	1480
All Trips following placemaking and mobility vision interventions	7.84	33018	33.4%	11023	62.1%	20516	4.5%	1480

Table 8-3 Overall Residential Car Trips Generated from the LSGR Site for the Three Scenarios

			Internal Car trips		External Car trips	
			as % of internal trips	Car Driver Trips Generated from Site	as % of external trips	Car Driver Trips Generated from Site
Car Driver Trips for new development with no interventions	3.8	15140	3.7%	106	49.9%	15034
Car Driver Trips following placemaking vision interventions	2.7	11496	8.0%	878	51.8%	10619
Car Driver Trips following placemaking and mobility vision interventions	2.3	9387	6.9%	762	42.0%	8625

8.3 The trips generated by residents of the LSGR site that are external to the site during the peak periods are presented in **Tables 8-4** to **8-6** for all trips and **Table**s **8-7** to **8-9** for car driver trips.

Table 8-4 All resident generated external trips from LSGR site with no placemaking or mobility interventions (worst case scenario)

All Trips (external)	External Trips		
Time of day	Arrivals	Departures	Total
0700-0800	211	1418	1629
0800-0900	761	3020	3781
0900-1000	783	1118	1901
1600-1700	1670	780	2450
1700-1800	1671	716	2387
1800-1900	1302	640	1942

Table 8-5 All resident generated external trips from LSGR site following placemaking vision interventions

All Trips (external)	External Trips		
Time of day	Arrivals	Departures	Total
0700-0800	144	968	1113
0800-0900	355	1407	1762
0900-1000	556	794	1350
1600-1700	1190	556	1746
1700-1800	1302	558	1860
1800-1900	1053	517	1570

Table 8-6 All resident generated external trips from LSGR site following placemaking and mobility interventions

All Trips (external)	External Trips		
Time of day	Arrivals	Departures	Total
0700-0800	144	968	1113
0800-0900	355	1407	1762
0900-1000	556	794	1350
1600-1700	1190	556	1746
1700-1800	1302	558	1860
1800-1900	1053	517	1570

Table 8-7 Car driver resident generated external trips from LSGR site with no placemaking or mobility interventions (worst case scenario)

Car Trips (external)	External Trips			Car Trip Rate / Dwelling
Time of day	Arrivals	Departures	Total	
0700-0800	115	767	882	0.22
0800-0900	321	1284	1605	0.40
0900-1000	428	550	979	0.24
1600-1700	817	456	1272	0.32
1700-1800	910	392	1302	0.32
1800-1900	684	322	1006	0.25

Table 8-8 Car driver resident generated external trips from LSGR site following placemaking vision interventions

Car Trips (external)	External Trips			Car Trip Rate / Dwelling
	Arrivals	Departures	Total	
Time of day				
0700-0800	87	579	666	0.17
0800-0900	181	725	906	0.23
0900-1000	301	386	687	0.17
1600-1700	600	335	935	0.23
1700-1800	712	307	1019	0.25
1800-1900	543	256	798	0.20

Table 8-9 Car driver resident generated external trips from LSGR site following placemaking and mobility interventions

Car Trips (external)	External Trips			Car Trip Rate / Dwelling
	Arrivals	Departures	Total	
Time of day				
0700-0800	72	474	546	0.14
0800-0900	151	595	746	0.19
0900-1000	247	313	560	0.14
1600-1700	492	270	762	0.19
1700-1800	581	247	828	0.21
1800-1900	438	203	642	0.16

8.4 It is useful to compare the outputs from the Vision-led Planning Tool approach to the traditional approach to estimating trip generation based on the TRICS database.

8.5 Traditionally, the industry standard practice for determining the trip generation resulting from new developments is to use data from the TRICS database to determine the anticipated person and vehicular trip generation (or trip rates) of a proposed development based on recent traffic survey data for comparable sites across the country.

8.6 However, there is a clear weakness of this approach when considering larger development sites (>500 dwellings) where radically different designs and strategies can have a significant impact on reliance of the car and take up of alternative modes.

8.7 The TRICS approach relies on the TRICS database containing a number of comparable sites as the basis for estimating trips generated from the new site, however:

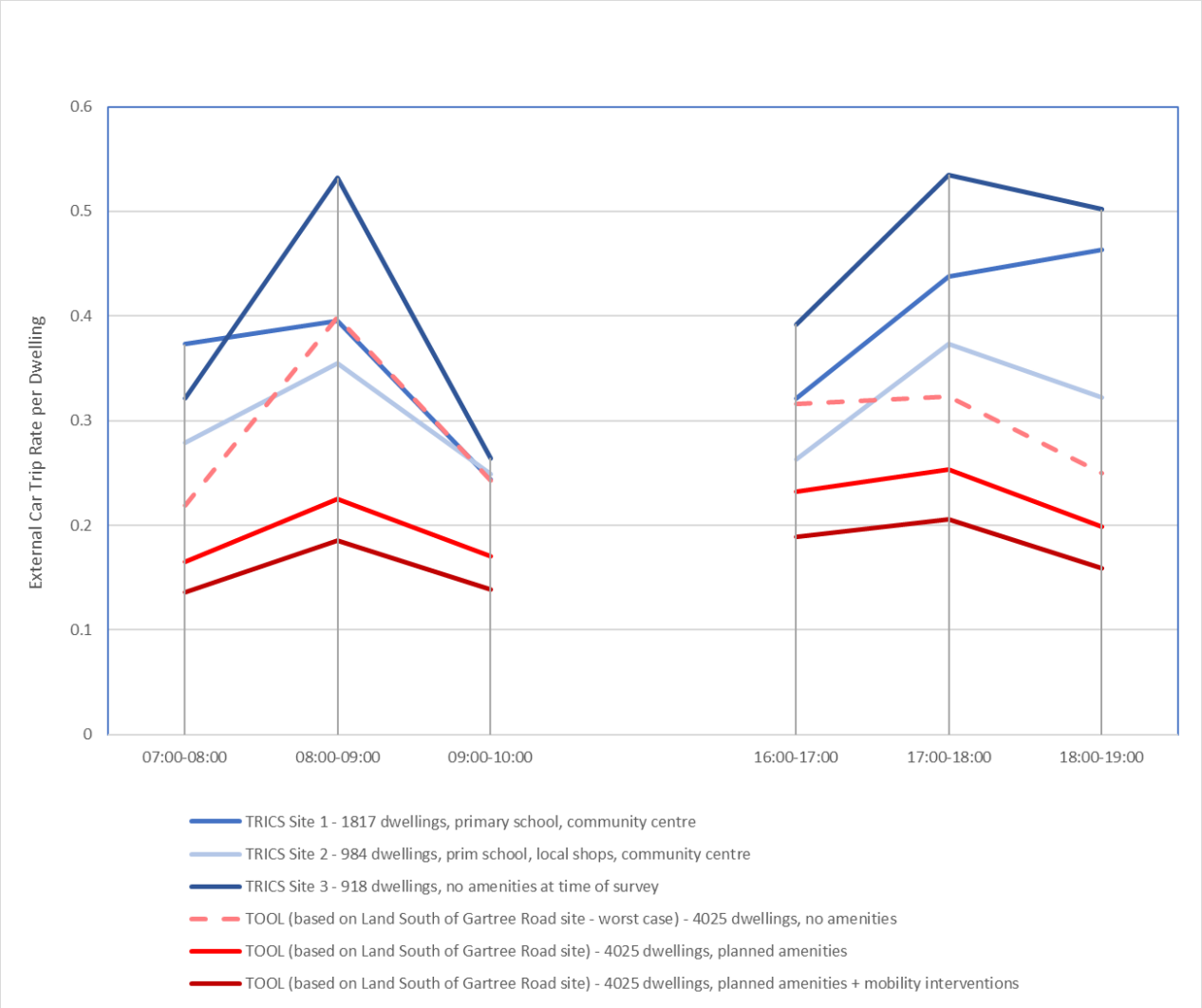
- there are very few residential sites within the TRICS database with >500 dwellings.
- the level of amenity provision within these sites is limited and variable. None reflect a vision led planning approach that prioritises local amenity provision facilitating local living; and
- reducing the size of the site selection in TRICS to 200 dwellings and above would increase the number of sites, however, these smaller sites do not provide the level of amenity and service provision that would be viable for a site over seven times this size.

8.8 **Figure 8-3** presents a comparison of the peak period car trip rates for external trips generated from equivalent sites in the TRICS database and those estimated by the Vision-led Planning Tool (presented in **Tables 8-7** to **8-9**).

8.9 The three TRICS sites included in **Figure 8-3** are the only privately owned residential with over 500 dwellings that had multi-modal surveys conducted outside of Covid affected periods existing within the TRICS database. As can be seen, the car trip rates vary between sites broadly in line with the level of on-site amenity provision. TRICS site 3 with no on-site amenity provision has the highest external car trip generation as would be expected since no external car trips are replaced by internal trips to on-site amenities. TRICS site 1 includes an on-site primary school and community centre and displays lower external car trip rate as a result. TRICS site 2 includes and onsite primary school, community centre and local shops and displays a lower external car trip rate. It is also noteworthy that the variation in external car trips is not solely due to existence of on-site amenities but also the distances to off-site amenities and the local transport infrastructure.

8.10 The results for the trip generation suggested by the Vision-led Planning Tool for the three scenarios tested are also shown in **Figure 8-3**. The dashed red line providing the external car trip rate for the LSGR site with no on-site amenities or mobility interventions – worst case scenario (**Table 8-7**). It can be seen that this sits between the three TRICS sites suggesting a reasonably good correlation with the limited surveyed sites of similar scale within TRICS. With the inclusion of the planned on-site amenities, the Vision-led Planning Tool suggests a significant reduction in external car trip generation (**Table 8-8**). This displays an external car trip reduction of 42.5% in the 08:00-09:00 a.m. peak hour and a 22% reduction in the 17:00-18:00 p.m. peak hour. This reduction is a result of the wider range of amenities included in LSGR compared to any of the TRICS sites combined with the avoided trips forecast for working from home, virtual meetings and home deliveries. Adding in the effects of the mobility interventions results in a further decrease (approx. 10%) in external car trips.

Figure 8-4 Comparison of external car trip rates estimated by the Vision-led Planning Tool with those from the three largest sites with multimodal survey in the TRICS database



8.11 This comparison gives confidence that the Vision-led Planning Tool approach is generally aligned with TRICS surveyed sites when comparing, as much as possible, like with like[12]. It also highlights the significant potential reductions in external car trips as a result of the on-site amenity provision planned for LSGR.

[12] No sites are identical and the very close proximity of the existing secondary school (Manor High School) is likely to result in lower car trip rates for the LSGR worst case scenario than the TRICS sites with more distant amenities.

9.0 Trips attracted to on-site amenities from outside the LSGR development

9.1 Certain amenities that are built within the development will attract trips from people not located in the development site. The trips generated to new on-site amenities are replacing previous, usually longer, trips to existing amenities. Consequently, they will mostly result in an overall reduction in carbon emissions, but the road network surrounding and within the new development will be impacted by higher levels of traffic. It is therefore important to estimate the likely level of trips attracted to on-site amenities.

9.2 Depending on the type of amenity there are different methods that are applied to estimate the trip attraction to particular on-site amenity from outside the development.

9.3 For on-site employment, the level of trip attraction from outside the development depends on the number of jobs provided on-site, the extent to which these are likely to be filled by residents living within the site and the levels of working from home that are anticipated. As there are a fixed number of jobs known to be available on-site, the trip attraction to on-site employment from outside the site is reasonably straight forward to determine. The distribution of distances travelled, and modes used to on-site employment, are assumed to be based on 2011 Census Data on Journey to Work distances for the closest Output Areas to the development location.

9.4 For education amenities provided on-site, the level of trip attraction from outside the development can be determined given knowledge of the school places unfilled by residents of the development. If on-site school places are all taken by residents of the development, then there will be no trip attraction to the school from outside the development. Where school places are not all filled by residents of the development, then for pupils living outside the development the distribution of distances travelled and modes used to access the on-site schools are based on NTS data on education and escort education trips for the relevant area type in which the development is located.

9.5 For all other amenities (retail, leisure, social, personal business) where use is not capped or limited by a fixed number of places, then a different approach is needed. This involves estimating the approximate population from outside the development site for which the on-site amenity is likely to become their easiest to access / preferred choice.

9.6 This requires estimates of the population surrounding the new development where an on-site amenity will become closer in distance or easier to access than their previous nearest/easiest to access comparable amenity prior to the new site development.

9.7 **Table 2-2** details the distance from the centre of the LSGR development site to the closest existing amenity. From this, an approximate catchment radius, and hence catchment population within this radius, can be determined for each type of retail, leisure, social, personal business amenity located on-site. This is shown in **Table 9-1** for LSGR.

9.8 Given this estimate of the external population in the catchment of an on-site amenity, the number of external dwellings preferring to use that on-site amenity can be derived and the daily trip rates per dwelling to specific types of amenity can be applied. These daily trip rates per dwelling are obtained from the area classification NTS base data adjusted for household type.

Table 9-1 External catchment population for each on-site amenity for LSGR (excludes schools and employment)

Amenity	Road network distance to closest existing amenity (km)	Catchment radius: half straight line distance from centre of development to closest existing amenity (km)	Approximate catchment population from outside development
Convenience store	2.3	1.0	1000 < 2000
Restaurants	2.6	1.1	5000 < 10,000
Café / Coffee Shop	2.4	1.0	5000 < 10,000
GP	1.1	0.5	1000 < 2000
Community Hall / Hub	2.6	1.1	5000 < 10,000
Chemist	1.1	0.5	1000 < 2000

9.9 Based on the above methodology, the person trips attracted from outside the development to each type of on-site amenity in LSGR is determined and the results shown in **Table 9-2**. Results for car trips attracted to the on-site amenities are shown in **Table 9-3**.

Table 9-2 Person trips attracted to LSGR amenities from outside the development

PERSON Trips		Primary School	Secondary School	Employment	Retail Amenities	Social Amenities	Sports/Leisure Amenities	Personal Business Amenities	TOTAL
TOTAL TRIPS (24 Hrs)		none	1753	1739	96	115	none	308	4011
07:00 – 08:00		none	125	251	1	2	none	16	395
08:00 – 09:00		none	647	225	4	4	none	35	914
09:00 – 10:00		none	47	75	8	7	none	29	166
16:00 – 17:00		none	106	194	7	10	none	31	348
17:00 – 18:00		none	41	240	6	12	none	30	328
18:00 – 19:00		none	13	132	6	14	none	20	184

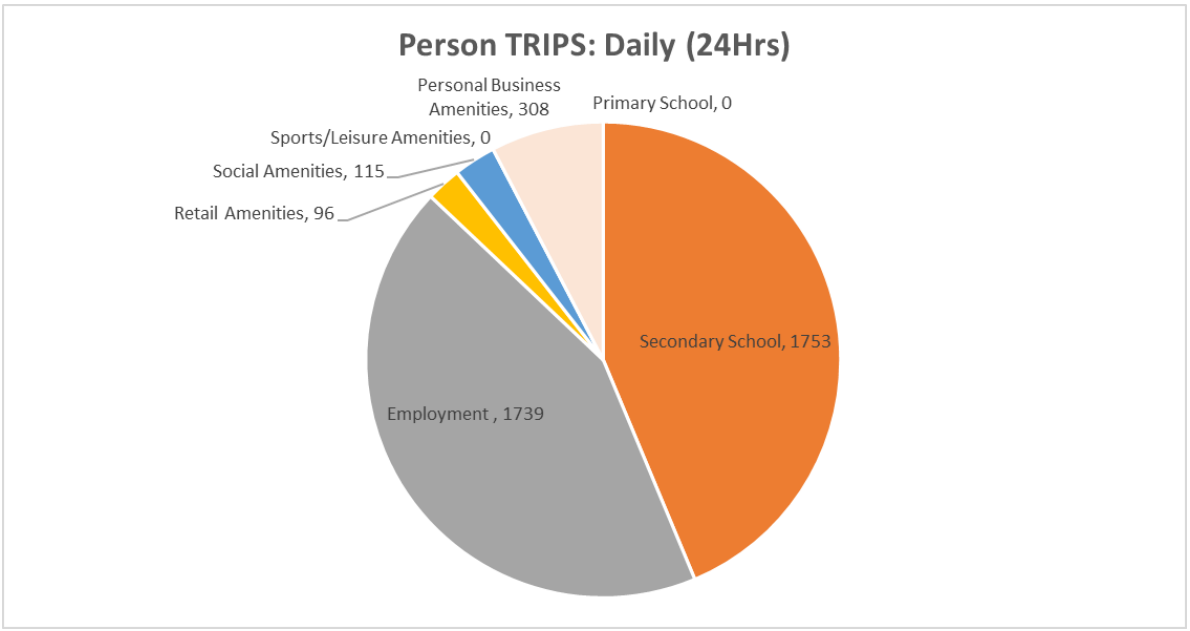


Table 9-3 Car driver (veh) trips attracted to LSGR amenities from outside the development

Car TRIPS		Primary School	Secondary School	Employment	Retail Amenities	Social Amenities	Sports/Leisure Amenities	Personal Business Amenities	TOTAL
TOTAL TRIPS (24 Hrs)		none	436	1041	53	23	none	128	1680
07:00 – 08:00		none	31	150	1	0	none	7	189
08:00 – 09:00		none	161	135	2	1	none	15	313
09:00 – 10:00		none	12	45	4	1	none	12	74
16:00 – 17:00		none	26	116	4	2	none	13	161
17:00 – 18:00		none	10	144	3	2	none	12	172
18:00 – 19:00		none	3	79	3	3	none	8	96

10.0 Trip Generation - Overall Results for LSGR

10.1 The trip generation is presented in **Table 10-1** broken down by internal trips generated by site residents, external trips from site generated by site residents, and trips attracted to the site amenities from persons living outside the site. This is presented for all trips and for car driver trips in each modelled time period.

10.2 **Figure 10-1** presents the daily trip data in chart form, **Figure 10-2** presents the 08:00-09:00 data as a chart, **Figure 10-3** presents the 17:00-18:00 data as a chart.

Table 10-1 Total trips generated by the LSGR development

	Residential -Internal Amenity	Residential - External	External - Attracted to Amenity	Car Driver Residential - Internal Amenity	Car Driver Residential - External	Car Driver External - Attracted to Amenity	Car driver trips as % of all trips
DAILY TRIPS (24 Hrs)	11023	20516	3898	762	8625	1184	30%
07:00 – 08:00	541	1113	393	32	544	189	37%
08:00 – 09:00	2075	1762	911	110	725	312	24%
09:00 – 10:00	665	1350	158	52	558	73	31%
16:00 – 17:00	802	1746	338	58	756	159	34%
17:00 – 18:00	622	1860	316	50	824	169	37%
18:00 – 19:00	524	1570	171	41	639	94	34%

Figure 10-1 Total daily trips generated by the Development by category

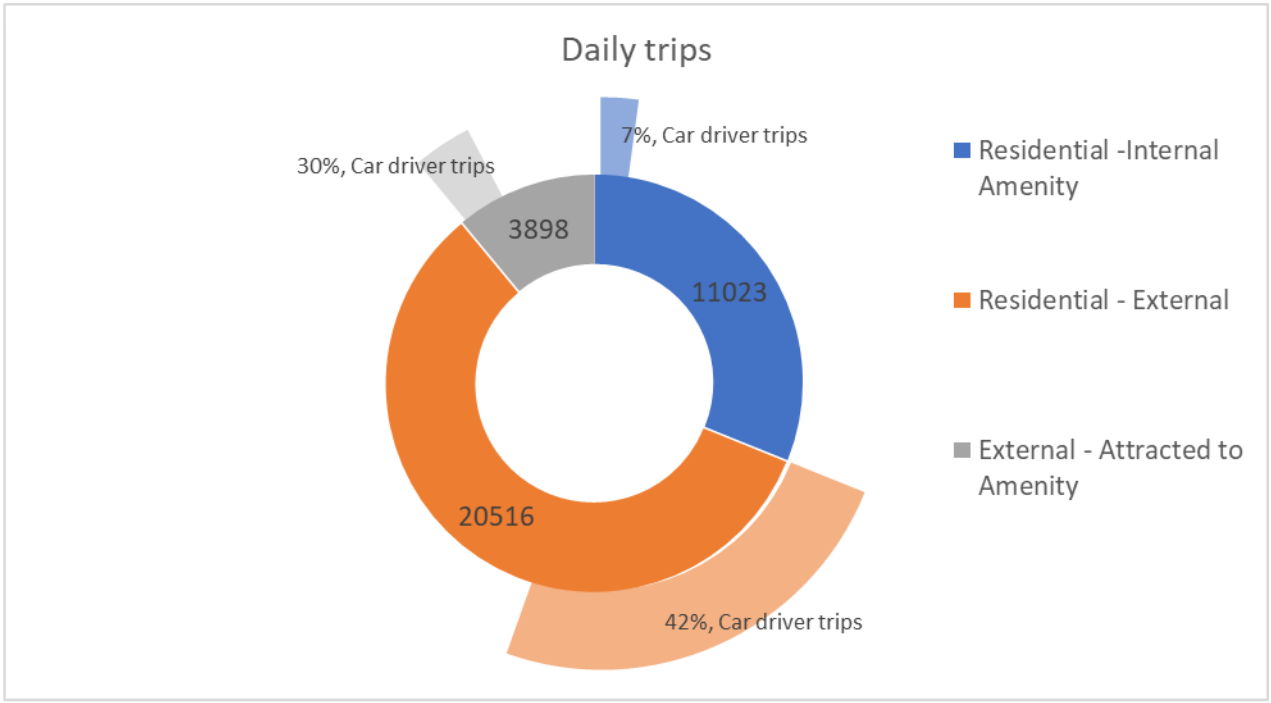


Figure 10-2 Total morning peak hour trips generated by the Development by category

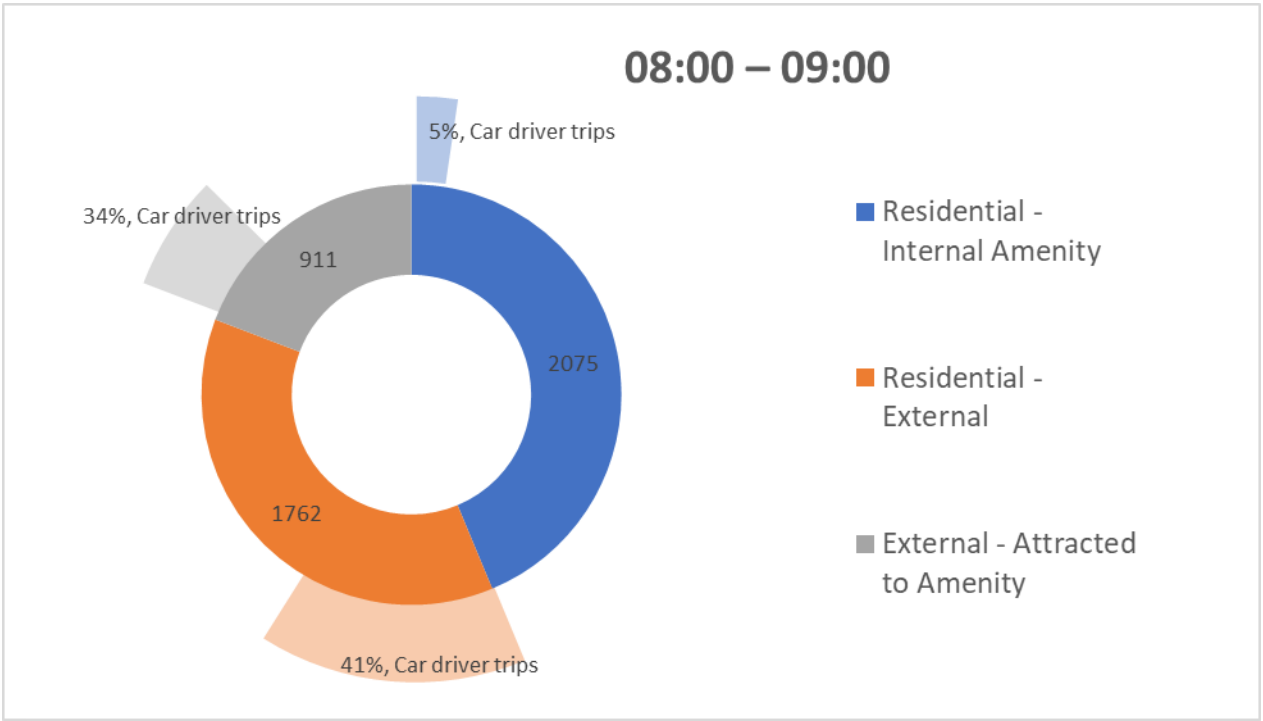
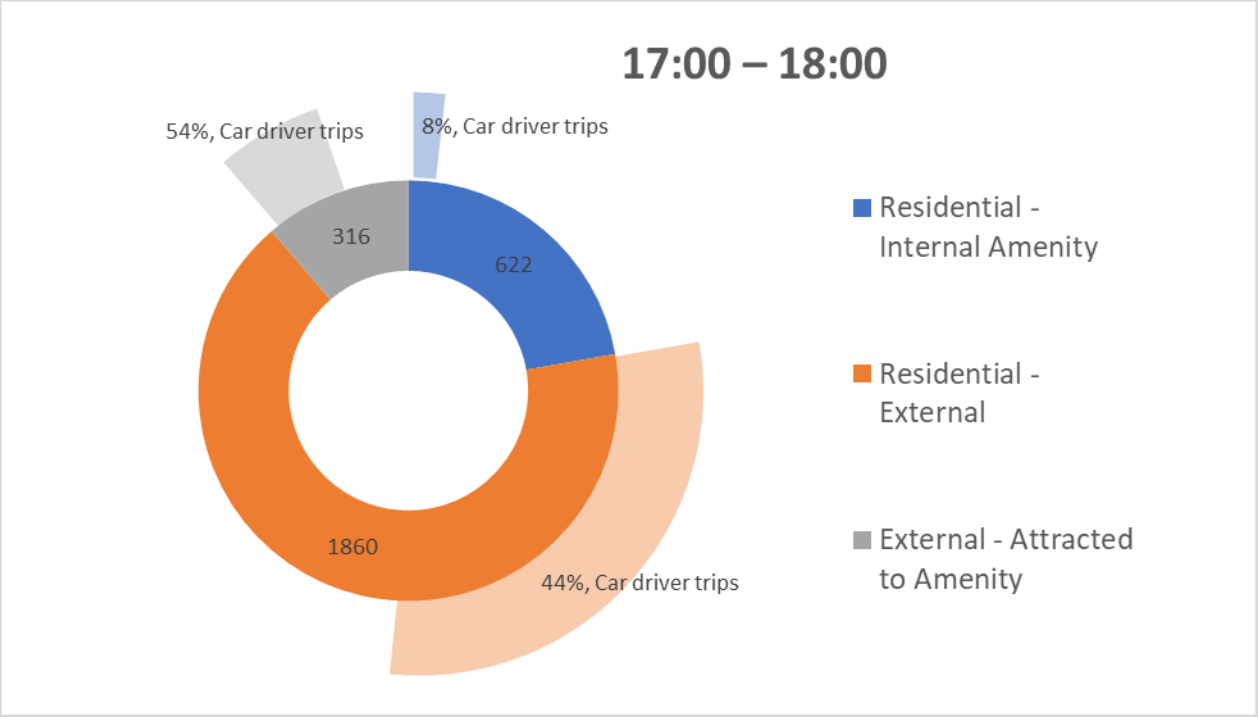
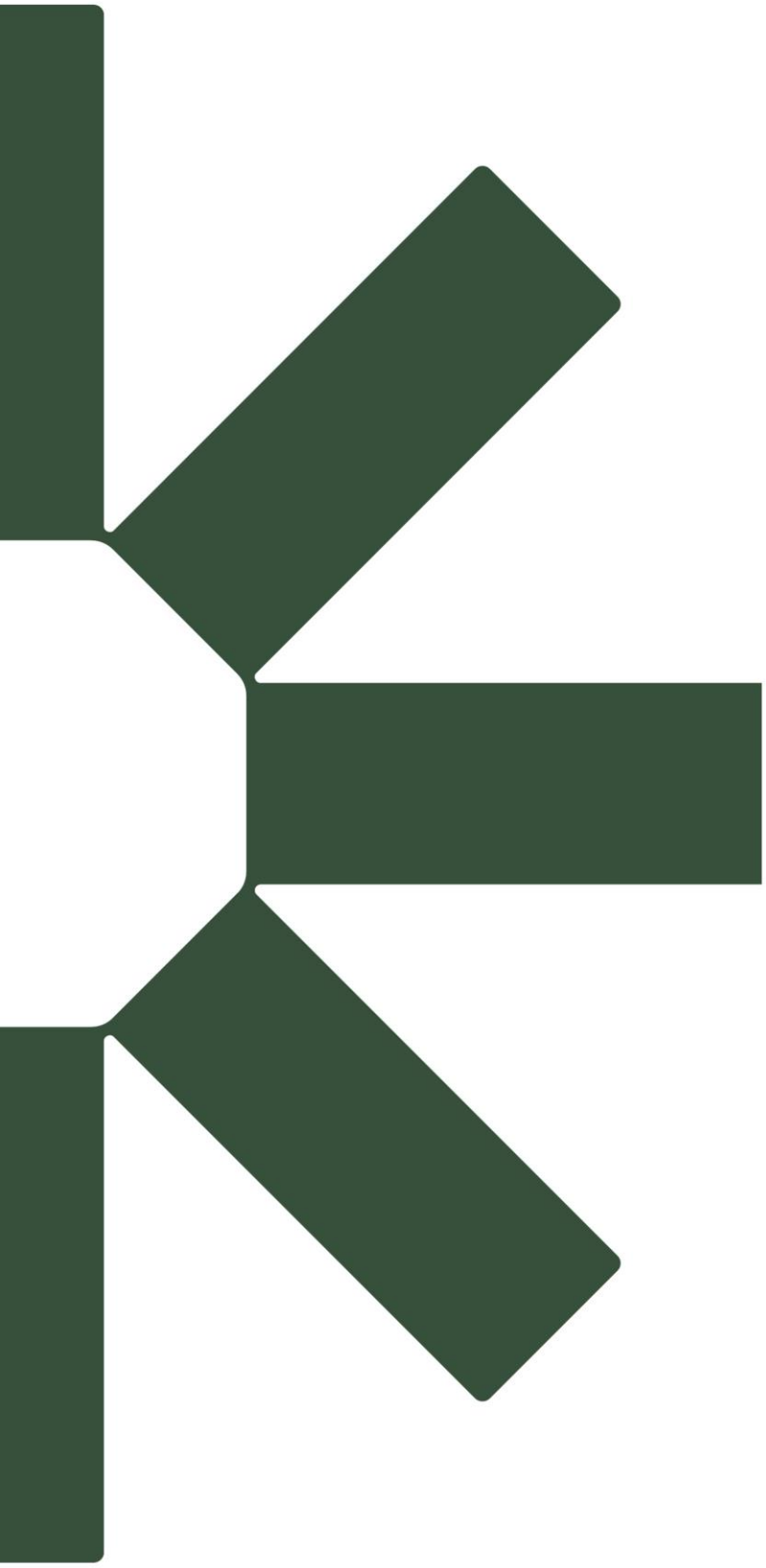


Figure 10-3 Total evening peak hour trips generated by the Development by category





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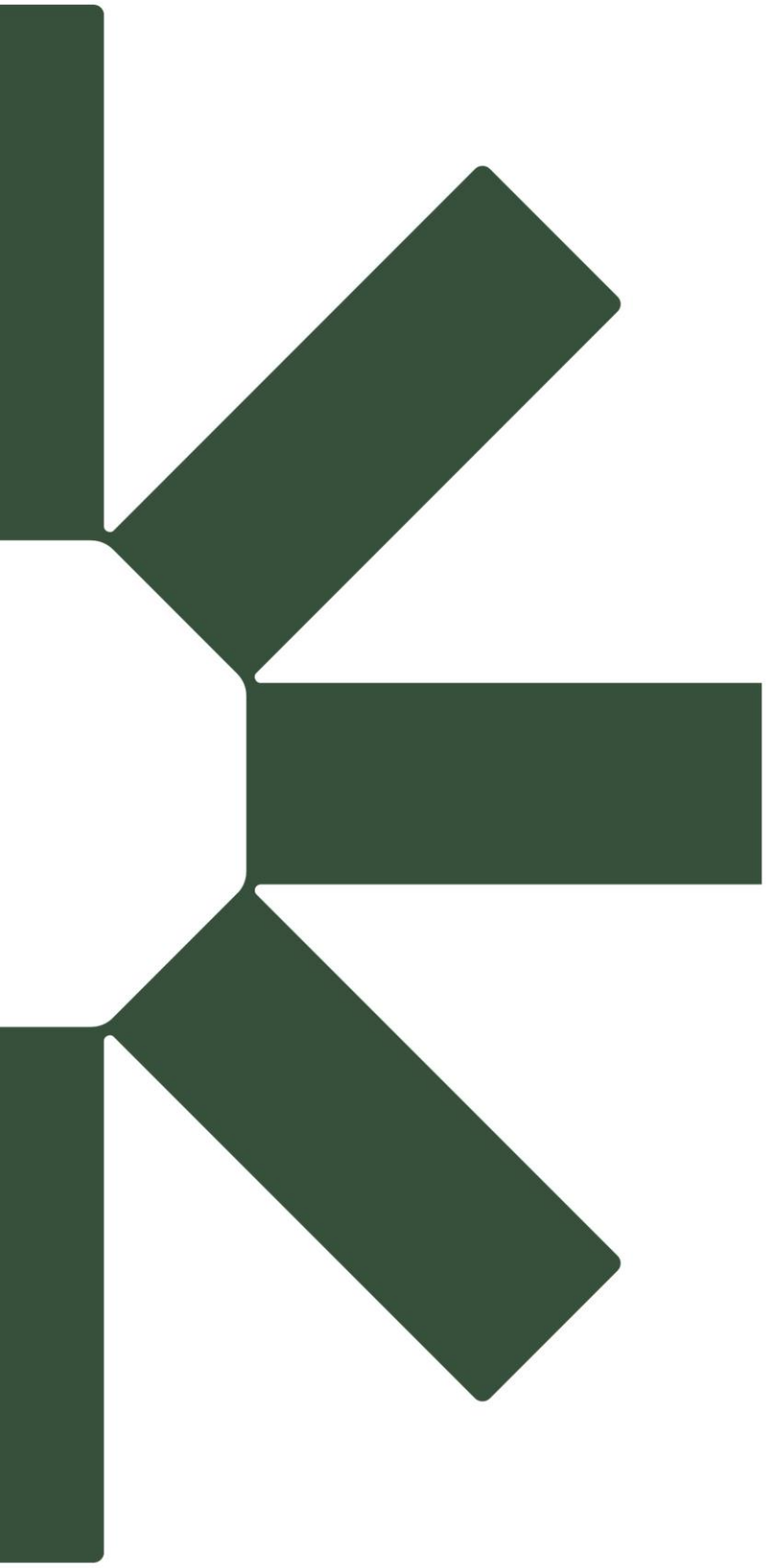
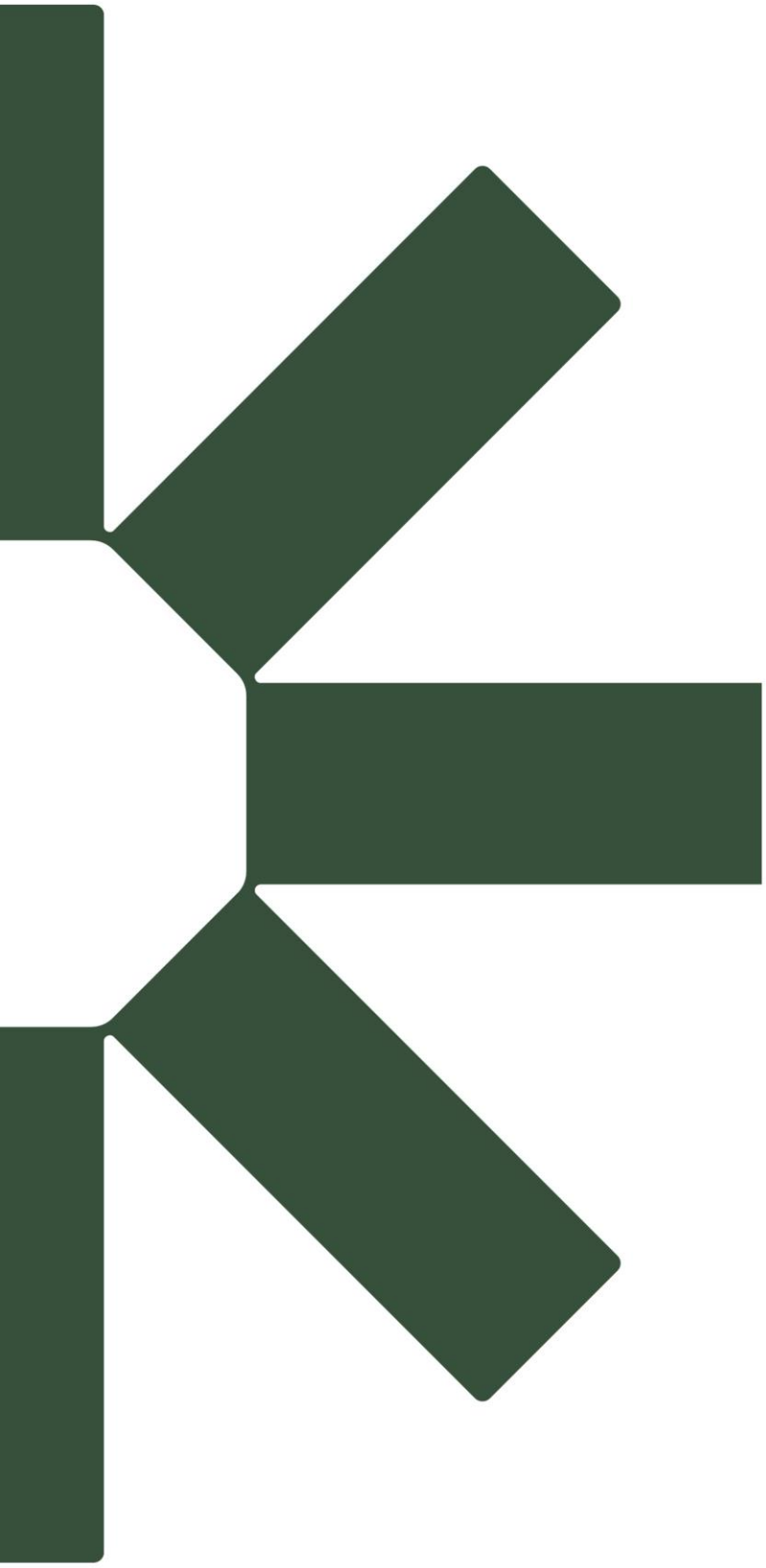


Making Sustainability Happen



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