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No:

# Proposed Submission Draft Harborough Local Plan 2020-2041 Representation Form



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

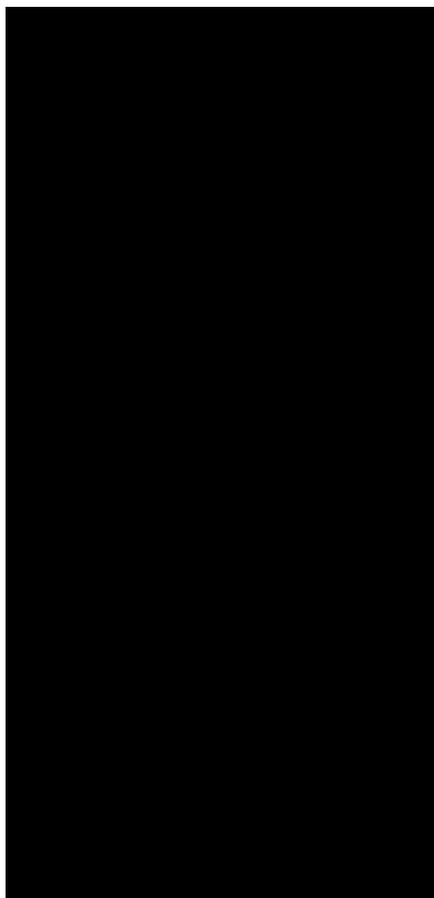
Please send completed forms by email to [localplan@harborough.gov.uk](mailto:localplan@harborough.gov.uk) or by post to: Strategic Planning, Harborough District Council, The Symington Building, Adam and Eve Street, Market Harborough, Leicestershire, LE16 7AG.

The consultation is open from 9am on Monday 10 March and closes at 9am on Tuesday 6 May 2025. Forms received after the closing date cannot be considered.

## Part A: Part A only needs to be completed once

### 1. Personal details

Title  
First Name  
Last Name  
Organisation  
(where relevant)  
Address Line 1  
Address Line 2  
Address Line 3  
Post Code  
Email



### 2. Agent's details (if applicable)

Title   
First Name   
Last Name   
Organisation  
(where relevant)   
Address Line 1   
Address Line 2   
Address Line 3   
Post Code   
Email

**Part B:**

Please complete a new Part B form for every Policy/Map/Paragraph you wish to comment on

# Representation Form

You do not need to return this form if you have sent the same response using the Council's online form for this consultation. Duplicates will not be considered.

**Which part of the Local Plan document does this representation relate to?**

*E.g. Paragraph/Policy/Map/Other*

Policy SA03 and Sustainability Appraisal (February 2025)

**Do you consider the Local Plan to be legally compliant?**

Yes  No

**Do you consider the Local Plan is sound?**

Yes  No

**Does it comply with the Duty to Cooperate?**

Yes  No

**If you do not consider the Local Plan is sound, please specify on what grounds:**

Positively prepared  Justified  Effective  Consistent with National Policy

Please give details below why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the statutory Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the statutory Duty to Cooperate, please also use this box to set out your comments.

Please see attached representations.

*Continue on next page*

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

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

Policy SA03 does not comprise an appropriate strategy. As set out at Table 1 of our representations, with further consideration of our Site, it is demonstrated that the SA scoring (which informs Policy SA03) does not fully realise the sustainable merits of development on the Site. Overall, it cannot be concluded Policy SA03 is justified but in any event, additional allocations are required having regard to our representations made in response to Policy DS01.

**Please specify the modifications needed to make the Local Plan sound/legally compliant**  
(Please note any non-compliance issue relating to the statutory Duty to Cooperate cannot be resolved through modification at examination).

Please see attached representations for full details.

In summary, the Council should reconsider its evidence base relating to the identification of Policy SA03 as an allocation but in any event, additional allocations are required having regard to soundness issues relating to Policy DS01.

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

Yes     No

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

Catesby Estates has significant land interest in the District and it is imperative Catesby can appropriately raise its concerns in relation to soundness at the oral hearing sessions.

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

**Do you wish to be notified?**

- When the Plan is submitted for independent examination?
- When the Inspector's Report is published?
- When document is adopted?

**Please return completed forms no later than  
9am on Tuesday 6 May 2025.**

# Harborough District Council

Proposed Submission Draft (Regulation 19) Harborough Local Plan -  
Representations

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ON BEHALF OF CATESBY ESTATES

May 2025

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# 1. Introduction

- 1.1 These representations are made on behalf of Catesby Estates to Harborough District Council's ("the Council") 'Proposed Submission Draft (Regulation 19) Local Plan' (March 2025) ("the draft Local Plan") ahead of its submission for independent Examination.
- 1.2 Catesby Estates' interest in the draft Local Plan for the purposes of these representations is that it has control of suitable, available and achievable land for residential development, in a sustainable location adjacent to the eastern edge of Market Harborough ("the Site").
- 1.3 The Site is already known to the Council following submissions to its most recent call for sites and Strategic Housing Employment Land Availability Assessment (SHELAA), site reference 21/8233. The SHELAA recognises the Site as close / adjacent to the sustainable settlement of Market Harborough, developable for an estimated 1,411 dwellings within the next 15 years (although Catesby consider the capacity of the Site to be circa 1,000 homes alongside supporting infrastructure, as detailed in these representations). Through a sensitive, masterplanned approach, key environmental issues can readily be addressed including access to and accessibility across the A6; attenuation of noise from vehicles along the A6; and how the wider landscape character of the area would be maintained.
- 1.4 The location and extent of the Site is identified on a plan at **Appendix A**, with more detail of its sustainable merits provided in a Vision Document (**Appendix B**) and Concept Masterplan (**Appendix C**) as well as at Section 5 of this submission.
- 1.5 In summary in this introduction, however, it should be noted that:
  - principal access via an existing roundabout junction on the A6 is achievable;
  - the Site is located a distance of only 1.1 km to Market Harborough railway station, some 600m to employment opportunities at Welland Business Park and approximately 1.5 km to the town centre;
  - multiple, active travel crossings of the A6 would provide permeable connectivity towards the centre of Market Harborough;
  - with a primary school and local centre, travel patterns of development would have a high degree of self-containment;
  - substantial areas of landscape enhancements and green infrastructure would be provided, including a destination park, woodland planting and ecological areas; and
  - a Landscape Visual Assessment (**Appendix D**) demonstrates how a sensitive landscape-led strategy / approach has informed the Concept Masterplan, with positioning of built form and substantial areas of green infrastructure that would avoid significant landscape or visual impacts from future development.
- 1.6 In respect of the draft Local Plan, these representations relate to Policy DS01 (Development Strategy: Delivering Homes) which does not meet 80% of the Council's local housing need or affordable housing needs, such that it cannot be considered *positively prepared* or *consistent with national policy* – it does not meet the National Planning Policy Framework's prescribed tests of soundness.

- 1.7 To address these issues of soundness in a pragmatic manner, draft Local Plan should be modified as part of its submission for Examination to increase the supply of housing where most sustainable to meet the housing needs of Harborough District, which should include a focus on its market towns, such as Market Harborough, as the higher tier settlements. This would ensure the 80% threshold of local housing need is met, whilst also delivering housing in a sustainable location.
  
- 1.8 Draft Local Plan Policy SA03 (North of Market Harborough) is also referred to in these representations, in the context of the Site's comparative or greater sustainability to these current allocations, as presented by the Council's Sustainability Appraisal (February 2025) and further assessment below.

## 2. Policy DS01 Development Strategy: Delivering Homes

### Housing Requirement / Transitional Measures

- 2.1 On 12 December 2024, the Government published the new National Planning Policy Framework (“**the 2024 Framework**”), which represents a deliberate return to a clearly ‘pro-growth’ ambition.
- 2.2 Alongside the 2024 Framework the Government introduced a new standard method for calculating local housing need. For Harborough District, the standard method derived local housing need figure has increased substantially from 510 dwellings per annum (dpa) (under the previous standard method) to 723 dpa, an increase of 42%.
- 2.3 It is recognised that rather than the 2024 Framework introducing a ‘cliff edge’ requiring emerging local plans to suddenly accommodate greater levels of housing need, it includes a set of transitional arrangements (as set out at paragraph 234) to enable suitably advanced plans to continue to proceed.
- 2.4 The Council seeks to rely on these transitional arrangements in its publication and consultation of the draft Local Plan – in particular, paragraph 234(a) of the 2024 Framework which allows a draft plan to be considered under the relevant previous version of the Framework where it has reached ‘Regulation 19’ stage before 12 March 2025 and its draft housing requirement meets at least 80% of local housing need.
- 2.5 Whilst the draft Local Plan has reached ‘Regulation 19’ stage before the cutoff date, it does not propose a housing requirement that would meet at least 80% of local housing need.
- 2.6 The draft Local Plan housing requirement (set out by Policy DS01) is 13,182 dwellings over a 21 year plan period or 628 dpa. If this was to meet the housing needs of Harborough District alone it would comprise some 87% of the standard method figure for the District. However, it is extremely relevant that a proportion of the proposed housing requirement (1,968 dwellings) is to provide for Leicester City’s unmet needs in accordance with an agreed position between Leicester and the Leicestershire authorities including the Council<sup>1</sup>.
- 2.7 If the Council’s commitment towards Leicester City’s unmet needs (1,968 dwellings) is disaggregated from the overall amount of housing the draft Local Plan seeks to plan for, the resultant position is a housing requirement of 11,214 dwellings or an average of 534 dpa which would meet just 74% of the Council’s local housing need. As a consequence, the draft Local Plan does not comply with the 2024 Framework’s transitional arrangements.
- 2.8 The failure of the draft Local Plan to provide a housing requirement that meets 80% of local housing need<sup>2</sup> is a matter of soundness, as the draft Local Plan does not align with the transitional measures set out in the 2024 Framework (paragraph 234(a)).

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<sup>1</sup> Leicester & Leicestershire Authorities - Statement of Common Ground relating to Housing and Employment Land Needs (June 2022)

<sup>2</sup> Calculated using the standard method in the Planning Practice Guidance, published on 12 December 2024, as set out in footnote 83 pf the 2024 Framework

2.9 In particular, the following is of note:

- paragraph 11b) of the 2024 Framework is clear that *“strategic policies should, as a minimum, provide for objectively assessed needs for housing...”*;
- paragraph 36a) advises that for plans to be ‘positively prepared’, they should be *“providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs...”*;
- paragraph 61 is clear that *“to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed...”*; and
- paragraph 62 outlines that to *“determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance”*.

2.10 Through advancing a housing requirement which seeks to meet only 74% of Harborough’s local housing need based on the 2024 Framework, the draft Local Plan would plainly fail to comply with the above policy requirements.

2.11 Given the above, the draft Local Plan cannot be considered positively prepared, justified, or consistent with national policy, unnecessarily delaying the delivery of much-needed market and affordable homes, fundamentally counter to the Government’s objective to boost housing supply and deliver 1.5 million new homes in this parliament.

2.12 To address this soundness matter in a pragmatic manner, the Council should update the draft Local Plan to address the requirements of paragraph 234a) of the 2024 Framework as part of a modifications submission for examination. In doing so, the Council must identify and allocate additional land for housing: to boost supply to support a housing requirement of at least 80% of the Council’s local housing need, in addition to the commitment towards meeting Leicester City’s unmet need. To achieve this, land for at least some 945 additional new homes should be found.

2.13 This additional housing requirement should be accommodated where it is most sustainable to meet the housing needs of Harborough District – namely as an expansion of its market towns as one of the highest tier settlements. Allocation of the Site, being land to the east of Market Harborough, would deliver approximately 1,000 homes as a sustainable new neighbourhood, thus meeting this shortfall in full through a single site. Through this route, the draft Local Plan should also be subject to an immediate review that responds to the 2024 Framework in full.

## Affordability

2.14 Alongside the 2024 Framework, the Government introduced a new standard method for calculating local housing need, which generally will direct housing to where it is most needed across England. In helping understand the purpose of the new standard method, the Government’s response to the proposed reforms to the National Planning Policy Framework<sup>3</sup> is relevant, noting specifically:

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<sup>3</sup> Government response to the proposed reforms to the National Planning Policy Framework and other changes to the planning system consultation, 27/02/25

- **Question 15 response:** *“Setting a baseline of 0.8% provides a consistent base for growth, which is then increased to reflect housing affordability pressures, setting ambitious expectations across the country while directing housing to where it is most needed.”*
- **Question 16 & 17 response:** *“The overall effect of these two changes [0.8% annual growth plus affordability adjustment] is that housing need is reduced in more affordable areas and increased in areas where affordability issues are most acute, but overall remains around 370,000 nationally. We think this better reflects an approach that is based on directing housing to where it is most needed.”*

2.15 The Council’s local housing need, derived using the new standard method, has increased substantially from 510 dwellings per annum (dpa) (under the previous standard method) to 723 dpa, an increase of 42% which reflects significant issues of affordability facing the District.

2.16 However, the consequence of planning for a reduced housing requirement against local need is that the draft Local Plan will exacerbate existing and increasing issues of unaffordability across the District.

2.17 Figures published by the Office for National Statistics identify that the ratio of median house prices to median gross annual workplace-based earnings in 2024 in Harborough District was 10.19 (or 10.58 over a five year average)<sup>4</sup>. This compares to a ratio of 7.52 in 2013 and is a figure that has doubled from a ratio of 5.33 in 2000. On this measure, the published figures when compared against other authorities demonstrate that Harborough District is the least affordable area across the East Midlands.

2.18 The effect of these levels of unaffordability is seen in the substantial demand for affordable homes across the District: the Leicester & Leicestershire Housing & Economic Needs Assessment Final Report (June 2022) identifies an annual need for some 439 affordable homes – a figure that is some 82% of the draft Local Plan housing requirement and significantly beyond what the Council could secure through proposed affordable housing Policy HN01 which seeks 40% provision for major developments.

2.19 Where no evidence has been seen that an increase in the overall percentage of affordable housing sought from new development would be viable, nor would not undermine other infrastructure delivery (and in any case would not be close to being able to meet the need for affordable homes in full), the Council instead should increase the draft Local Plan’s housing requirement, noting market led housing schemes offer the best solution to significantly boost the supply of affordable homes, as reflected in the approach adopted by the current draft Local Plan.

2.20 Whilst the standard method includes an affordability adjustment, the Planning Practice Guidance is clear that when applied it only *starts* to address such issues. It is not a full solution to problems of affordability and particularly so in the case of the draft Local Plan where local housing need would not be met:

*“The affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the affordability of homes.”<sup>5</sup>*

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<sup>4</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearninglowerquartileandmedian>

<sup>5</sup> Paragraph: 006 Reference ID: 2a-006-20241212

- 2.21 That the draft Local Plan does not sufficiently address issues of affordability by pursuing a housing requirement that is demonstrably too low, either through transitional measures or under the 2024 Framework, is a matter of soundness – as it currently does not provide a strategy to meet the need of groups in the community that require such affordable homes, it cannot be considered positively prepared or justified and is not consistent with paragraph 63 of the 2024 Framework as national policy<sup>6</sup>.
- 2.22 To address this issue, to boost the supply of housing in the face of challenges of affordability, the Council should identify suitable, available and achievable additional sites, in the most sustainable locations to meet the housing needs of Harborough District, which should include significant growth of its highly sustainable market towns, such as Market Harborough. This exercise should recognise the Site, land to the east of Market Harborough, that would deliver approximately 1,000 homes, including policy compliant levels of affordable housing, as a sustainable new neighbourhood.
- 2.23 Modifications to this effect should be made to Policy DS01 (Development Strategy: Delivering Homes) and corresponding additional site allocation policies of the draft Local Plan.

## Plan Period

- 2.24 The 2024 Framework is clear, at paragraph 11b) (as part of the presumption in favour of sustainable development), that strategic policies should, as a minimum, provide for objectively assessed needs for housing. In doing so, the 2024 Framework (paragraph 22) requires that “*Strategic policies should look ahead over a minimum 15 year period from adoption...*” but as important, to ensure the objectively assessed need for homes can be met, is to ensure an appropriate and justified base-date for plan making.
- 2.25 Currently, the draft Local Plan proposes a plan period of 21 years between 2020/21 – 2040/41, which includes a significant period of four years (at the present time) looking back to when completions from existing allocations and other committed developments are set to contribute to delivery within the proposed draft Local Plan period, despite having already been carried out or consented. Such completions therefore provide an ‘artificial’ boost to supply, by capturing past years of comparatively high delivery.
- 2.26 To seek to justify the 2020 base date of the plan period, the Council’s ‘Development Strategy Paper’ (February 2025) (page 5, under section ‘The Scale of Housing Growth’) states that that year aligns with the ‘Housing and Economic Needs Assessment (2022)’ (“**the HENA**”). However, the HENA does not prescribe / set the Council’s local housing need; rather strategic policies are informed by a figure derived from an assessment using the standard method in accordance with 2024 Framework paragraph 62 (the housing requirement must be at least 80% of this figure), which was published only in December 2024.
- 2.27 The draft Local Plan refers to the requirement to address an apportionment of Leicester City’s unmet housing need across a period between 2020 and 2036<sup>7</sup>; however, this does not present an overriding reason that would justify the draft Local Plan’s base date of 2020 against the issues identified above. The total contribution towards Leicester City’s unmet need of 1,968 dwellings can simply be planned for over a shorter period from a new base date to 2036.

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<sup>6</sup> The 2024 Framework is referred to, rather than the previous version of the Framework published in December 2023, given the draft Local Plan does not meet the transitional arrangements

<sup>7</sup> Draft Local Plan paragraph 4.5

- 2.28 Whilst the emerging Leicester City Local Plan has a base date plan period of 2020, it is noted that the plan was submitted for Examination nearly two years ago in September 2023. However, the Examination for the Harborough Local Plan would, at best, commence in late 2025 and likely spill over into 2026.
- 2.29 The consequence of this retrospective approach to the draft Local Plan period is that the number of homes the Council needs looking ahead to the future is suppressed.
- 2.30 Over the period 2020/21 to 2023/24, Housing Delivery Test measurements<sup>8</sup> and other Government statistics<sup>9</sup> confirms that some 3,693 dwellings were delivered in Harborough District. If measured against a standard method calculated need (of 534 dpa) over the same period, draft Local Plan Policy DS01 accounts for an ‘overprovision’ of 1,557 dwellings.
- 2.31 This effectively reduces the required supply over the forward-looking 2024/25 – 2040/41 period by the equivalent amount: the draft Local Plan seeks to restrict the housing supply moving forward by ‘banking’ previous overprovision. The draft Local Plan is clearly not *positively prepared*.
- 2.32 This matter is all the more concerning given the context that housing need in Harborough District from 2024 – 2041 is significantly greater than that which the draft Local Plan seeks to provide for.
- 2.33 Instead, to resolve this issue, the plan making period of the draft Local Plan should commence at the base-date of the monitoring period for which the housing need projecting forwards is calculated: the proposed plan period (draft Local Plan Policy DS01) should be amended to reflect the 17-year period 2024/25 to 2040/41.
- 2.34 Further housing allocations should be identified in sustainable locations to ensure that the housing requirement is met over the forward-facing 17-year period.

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<sup>8</sup> <https://www.gov.uk/government/collections/housing-delivery-test>

<sup>9</sup> <https://assets.publishing.service.gov.uk/media/67e40e2555239fa04d412025/LiveTable253.ods>

### 3. Policy SA03 and Sustainability Appraisal (February 2025)

- 3.1 For reasons identified above – that the draft Local Plan does not meet transitional provisions of the 2024 Framework, that it will exacerbate levels of housing unaffordability in the District and is not positively prepared in suppressing the future growth necessary to meet local needs – additional land to boost the supply of homes should be identified and allocated.
- 3.2 Consistent with the spatial strategy of the draft Local Plan, but necessary to address the identified matters of soundness, there is opportunity for residential led development (as a new mixed use neighbourhood including up to 1,000 new homes) on land to the east of Market Harborough (the Site).
- 3.3 The Site is available now; in single ownership and singularly controlled by Catesby Estates; and able to accommodate significant new social, transport and green infrastructure.
- 3.4 A Vision Document (**Appendix B**) and Concept Masterplan (**Appendix C**) for the Site has been prepared by Catesby Estates, which provides a general approach of how development on the Site could be arranged. This includes:
- the continuation of built development beyond (to the east of) the A6 for up to 1,000 homes, with areas of medium density of dwellings in the western and lower densities in the eastern part of the Site;
  - principal access to the Site via a remodelled junction off the A6;
  - active travel routes through the Site and crossings of the A6, directly connecting to the urban area of Market Harborough and highly accessible by walking and cycling to existing higher order services and facilities including the railway station and town centre;
  - new local facilities, including a mixed use local centre with retail and community uses and two form entry primary school;
  - opportunity to route bus services through the centre of the Site;
  - a substantial network of green infrastructure, including a destination park, formal sports pitches, allotments, new woodland planting and space for nature and a net gain in biodiversity.
- 3.5 Technical work to support development on the Site has been progressed by Catesby Estates:
- a Transport Technical Note (**Appendix E**) explains how the realignment of the A6 / Kettering Road roundabout would be achieved, which would also include toucan crossing facilities to accommodate pedestrians and cyclists. The Transport Technical Note further demonstrates that the roundabout is anticipated to operate within capacity, with a maximum queue of two vehicles across any peak at any arm and a maximum delay of eight seconds; and
  - a Landscape Visual Assessment (**Appendix D**), providing analysis that identifies:
    - that the Site is enclosed to the north and south by distinguishable ridges;
    - that the landform of the Site faces west / north-west towards the A6 and extensive settlement of Market Harborough;

- that the terrain to the east of the Site presents a clear, defensible landscape boundary including the woodland of Dingley Warren; and
- opportunities to reinstate lost hedgerow boundaries, in combination with additional blocks of woodland to provide structure for development parcels.

**3.6** The Landscape Visual Assessment demonstrates how a sensitive approach has informed the Concept Masterplan, with positioning of built form and substantial areas of green infrastructure that would avoid significant landscape or visual impacts from future development

**3.7** The emerging concept for the Site, as shown in the Vision Document, is shaped by a desire to create a vibrant, liveable growth area within a sustainable location. The proposals would:

- reinforce an outstanding quality of life and community, by providing a range of complementary uses and amenities, and in particular, providing an extensive landscape and open space framework offering opportunities for all to lead a healthy and active lifestyle;
- support sustainable modes of movement to access work, visit local services and facilities in and around Market Harborough; and to also access the surrounding countryside;
- nurture a healthy, varied economy that harnesses benefits of proximity to Market Harborough while creating new and supporting existing diverse work opportunities in the local area.

**3.8** The Council’s Sustainability Appraisal (February 2025) (“**the SA**”) includes an assessment of the Site as a potential option for allocation (site ref. 21/8233 or 24/12212). Overall, the Site scores well with more neutral or positive scores than negative scores against the sustainability objectives.

**Table 1: SA Scoring for the Site of Land East of Market Harborough**

SA Objective	Council’s Scoring	Nexus Planning’s Scoring	Comments
SA1 Climatic Factors	0	0	A negligible effect
SA2 Biodiversity	-?	+	Only arises due to proximity to a SSSI Impact Zone, noting this covers the majority of Market Harborough. At the next stage of the assessment where specific proposals can be considered, including with a net gain to biodiversity, it is expected this will be positive
SA3 Efficient Use of Resources	?/0	?/0	Any loss of agricultural land should be readily outweighed by other considerations / benefits
SA4 Heritage	?	0	Whilst the site is within 250m-1km of heritage assets, the distance is such that there would be no impact upon the setting of these designated assets meaning the score will at the next stage be neutral - ‘0’.
SA5 Air Quality	0	0	Agree not within 100m of an AQMA
SA6 Community	+	++	Agree within current scoring but the scheme would incorporate on-site healthcare provision and will include significant open space, resulting in a ‘++’ score.

SA Objective	Council's Scoring	Nexus Planning's Scoring	Comments
SA7 Social Inclusion	0	++	New school and potential on site healthcare provision, along with large areas of open green space, will provide significant positive effects to social inclusion and wellbeing
SA8 Access to Services	++/+?	++	The site is next to the built-up area of Market Harborough and will provide an on-site primary school and potentially pre-school
SA9 Housing	++	++	Agree more than 500 dwellings
SA10 Economic Growth	+?	+	Within 600m of public transport links and employment areas
SA11 Waste	0	0	A negligible effect
SA12 Flood Risk	/0	0	The site is largely within Flood Zone 1
SA13 Sustainable Travel	++	++	Within 1.8km of a railway station and within 450m of a bus stop or cycle path
SA14 Landscape	?	-/+	Consider the development will have a mixed minor negative and minor positive effect

3.9 Having regard to Table 1, it is clear the Site should score better in relation to SA2, SA4, SA6, SA7, SA8 and SA10.

3.10 At Table 2 the critique of the SA's scoring for the Site is compared to the three sites north of Market Harborough that the draft Local Plan has preferred for development, allocated under draft Policy SA03: site MH1 for 250 dwellings; site MH2 for 850 dwellings; and site MH3 for 600 dwellings.

**Table 2 Comparison of the Site and Policy SA03 Sites**

SA Objective	Land East of Market Harborough (the Site)	Policy SA03 Sites MH1, MH2 & MH3	Comments
SA1 Climatic Factors	0	+/-	In this context, there is no material difference between negligible and mixed minor effects
SA2 Biodiversity	+	--/+	The Site east of Market Harborough scores more highly
SA3 Efficient Use of Resources	?/0	?	No material difference
SA4 Heritage	0	--/+	A negligible effect of development on the Site is preferred to a mixed significant negative / minor positive effect
SA5 Air Quality	0	+/-	In this context, there is no material difference between negligible and mixed minor effects
SA6 Community	++	++	Sites score the same

SA Objective	Land East of Market Harborough (the Site)	Policy SA03 Sites MH1, MH2 & MH3	Comments
SA7 Social Inclusion	++	++	Sites score the same
SA8 Access to Services	++	++	Sites score the same
SA9 Housing	++	+	The Site east of Market Harborough score more highly
SA10 Economic Growth	+	0	The Site east of Market Harborough score more highly
SA11 Waste	0	0	Sites score the same
SA12 Flood Risk	0	+/-	A negligible effect of development on the Site is preferred to a mixed significant negative / minor positive effect
SA13 Sustainable Travel	++	++	Sites score the same
SA14 Landscape	-/+	-/+	Sites score the same

3.11 Against the assessment of the Site to the east of Market Harborough in comparison with sites preferred by Policy SA03, the Site scores better in respect of biodiversity, housing and economic growth, with no significant or material difference on other objectives. This, being the Council’s own evidence, undermines the Council’s claimed justification in the SA<sup>10</sup> for not preferring the Site for development – that *“the site is not considered an appropriate location for residential development when compared with other locations and sites at Market Harborough.”* and accordingly the draft Local Plan and in particular Policy SA03 cannot be considered justified.

3.12 With regard to the assessment of the Site in the Council’s ‘Strategic Housing and Economic Land Availability Assessment (SHELAA), 2021 – Site Companion Guide’ (dated 5 September 2022)<sup>11</sup>, this pre-dates the detailed Vision Document and technical work previously submitted by Catesby Estates with its representations to the ‘Issues and Options Consultation (Regulation 18) (as also enclosed with these Regulation 19 representations) (i.e. the SHELAA does not take this information into account), thus should hold little weight.

3.13 Catesby Estates considers the SA to demonstrate the positive overall sustainability of housing led growth on the Site, which is as sustainable if not more so than the preferred allocations to the north of Market Harborough, consistent with key objectives of draft Local Plan.

<sup>10</sup> Site ID 24/12212, p.81 Appendix E, Sustainability Appraisal (February 2025)

<sup>11</sup> [https://www.harborough.gov.uk/downloads/file/7472/final\\_site\\_companion\\_guide\\_05\\_09\\_2022](https://www.harborough.gov.uk/downloads/file/7472/final_site_companion_guide_05_09_2022)

## 4. Conclusion

4.1 These representations on behalf of Catesby Estates have regard to policies of the draft Local Plan and identify issues of soundness. To overcome these issues in a pragmatic manner, the Council should present modifications through the Examination process to demonstrate that the draft Local Plan is positively prepared and justified, as well as effective and consistent with national policy against the tests of soundness (paragraph 36 of the Framework). In such a case, the draft Local Plan must also be subject to an immediate review, which responds to the 2024 Framework in full.

4.2 In particular, these issues of soundness are:

### *Transitional Arrangements*

4.3 The draft Local Plan's housing requirement at Policy DS01, in respect of the homes needed in Harborough District (disaggregating the supply the Council is committed to providing in respect of Leicester City's unmet need) is less than 80% of its standard method derived local housing need.

4.4 The draft Local Plan cannot be considered positively prepared, unnecessarily delaying the delivery of much-needed market and affordable homes, counter to the Government's objective to boost housing supply and deliver 1.5 million new homes in this parliament; it is also not consistent with national policy expressed in the 2024 Framework.

4.5 The Council should modify the current draft Local Plan as part of its submission for Examination and additional allocations must be made, which should include the Site, noting this can ensure the 80% threshold of local housing need is met through a single additional site, whilst also delivering housing in a sustainable location.

### *Affordability*

4.6 Draft Local Plan Policy DS01 fails to provide a strategy that has regard to suitable, available and achievable additional sites, consistent with a sustainable spatial strategy, that would boost the supply of housing in the face of challenges of affordability. As such, where issues of affordability would be exacerbated, the draft Local Plan cannot be considered positively prepared, justified or consistent with national policy.

4.7 Modifications to this effect should be made to Policy DS01 and corresponding additional site allocation policies of the draft Local Plan, which should include development on the Site.

### *Plan Period*

4.8 The base-date of 2020 for the draft Local Plan, retrospectively looking across a period of historic housing delivery, seeks to artificially reduce the housing supply moving forward by 'banking' previous overprovision. The draft Local Plan cannot be considered forward facing or positively prepared, instead seeking to suppress housing supply, exacerbating other issues of soundness raised above.

4.9 Again, modifications to the draft Local Plan Policy DS01 should be made to bring the base-line date forwards and plan for the housing needed in the future, requiring additional sites (which should include the Site to the east of Market Harborough) to be allocated for growth.

# Appendix A      Site Location Plan

# Appendix B Vision Document

# Appendix C      Concept Masterplan

# Appendix D      Landscape Visual Assessment

# Appendix E      Transport Technical Note

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