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

**Part B:**

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

# Representation Form

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

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

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

Plan Period

**Policies:** SA02; HN01 ; HN02 ; HN03 ; AP01 ; AP03 ; DM05 ; DM06 ;

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

Yes  No

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

Yes  No

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

Yes  No

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

Positively prepared  Justified  Effective  Consistent with National Policy

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

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

Please refer to attached documentation.

*Continue on next page*

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

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

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

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

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

Yes     No

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

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

**Do you wish to be notified?**

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

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

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

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

06 May 2025

Dear Sir/Madam,

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

This document comprises Terra's representations to the Regulation 19 ("Reg. 19") version of the Harborough Local Plan Review consultation. These have been prepared in relation to our land interest, identified as Land to the North of London Road and the A6 (hereafter "the site"), Oadby. We therefore submit the following representations to the Harborough Authorities, Reg. 19 Consultation, May 2025.

### **1. *The Site and Planning History – Land to the North of London Road and the A6, Oadby***

- 1.1 Terra have an interest in Land to the north of London Road/A6 which is on the south eastern edge of Oadby, and to the north west of the village of Great Glen, Harborough.
- 1.2 The site currently sits on the cross boundary of Oadby and Harborough, with the majority of the site located within Harborough (Figure 1).
- 1.3 The site is bounded by current residential development to the north west, with open countryside to the north east and south east of the site, and the A6 located adjacent to the site at the south west. The boundaries of the site are largely contained by existing hedgerows and trees. The land directly east and north of the site is currently draft allocated within the emerging Local Plan and being promoted by Homes England for strategic development.
- 1.4 The town of Oadby has accessibility to lots of services and facilities, including primary schools, public houses, restaurants, bars and pubs, public parks, and places of worship.
- 1.5 The site is wholly located within an area least at risk of flooding, Flood Zone 1. The site is not subject to any Tree Preservation Orders (TPOs) and is not within a Conservation Area. Therefore, it is a relatively unconstrained site with limited planning concerns.

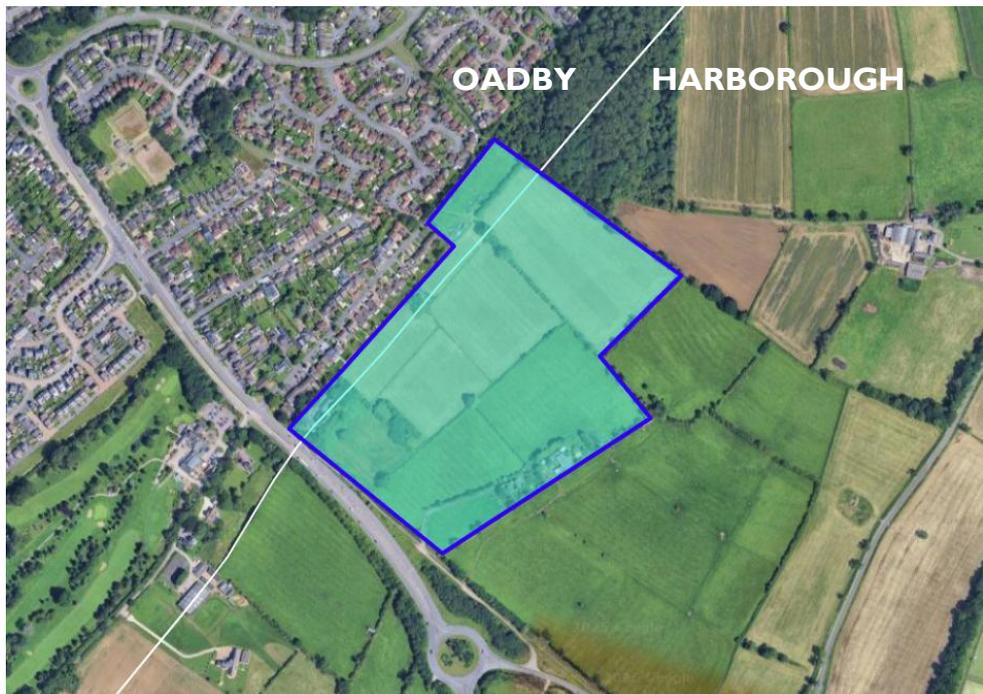
### **2. *Settlement Context – Oadby***

- 2.1 Within the adopted Local Plan, Oadby is identified as a District Centre settlement. Within the Preferred Options Local Plan, Oadby is identified as a *Tier 1 Adjoining Leicester Urban Area* within the Settlement Hierarchy.
- 2.2 Within the Vision for the emerging Local Plan, it is said that Developments will offer a range of housing options, including affordable housing, and be mainly focussed in the areas near to the City of Leicester and Borough of Oadby and Wigston, around the market towns and to a lesser degree the large and medium villages. The site Terra are promoting is available and suitable for the delivery of housing within the proposed Plan period. It should be

considered for inclusion within the proposed allocation on the edge of Oadby, as this would work towards achieving the proposed vision for the Local Plan by providing further housing to the local community.

- 2.3 Oadby lies in the most westerly part of Harborough district. It is located adjacent to the A6 motorway and is situated approximately 6 miles south west from Leicester City Centre, providing further facilities and services which can provide residents of Oadby with additional amenities and means of employment.
- 2.4 The town of Oadby has a reasonable range of service and facilities available to its residents, including public houses (such as The Grange Farm, and The Lord Keeper of the Great Seal), a variety of primary schools and colleges, large supermarkets (Sainsbury's), the Nature Reserve, places of worship (St Paul's Church) and local doctors' surgeries. Therefore, the site Terra are proposing to bring forward for allocation is within a sustainable location with good access to a variety of services and facilities.
- 2.5 There is good availability of employment opportunities within the town of Oadby. Additionally, Leicester is located within 6 miles of the area and can provide further employment opportunities for new and current residents. Leicester can easily be accessed either via private vehicles, or sustainable public transport services. The village is served by regular bus services (the X3 and X31 services) which are within a short walking distance of the site and provides links to the surrounding settlements of Leicester and Market Harborough.
- 2.6 Given the sustainable location of the site, with good access to public transport services and neighbouring villages, as well as the unmet local housing need, Terra politely requests that Land to the north of London Road and the A6, Oadby is allocated within the draft Local Plan for residential development.

**Figure 1: Location of Site - Cross Boundary Visual**



**Figure 2: Location of Land to the north of London Road and the A6, Oadby**



### 3. Policy Background

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

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

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

OR

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

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

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

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

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

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

#### 4. **Regulation 19 – Proposed Draft Local Plan Submission**

##### *Plan Period*

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

##### *Policy SA02: Land South of Gartree Road Strategic Development Area*

- 4.2 Land South of Gartree Road is identified within the Local Plan as a cross-boundary new residential-led mixed-use development to deliver circa 3,150 new homes within Harborough District (and 4,000 overall with the remainder being delivered within Oadby). Terra wholly support the inclusion of this site as a strategic allocation for the delivery of much needed housing on the edge of the urban area.
- 4.3 Land to the north of London Road and the A6, which Terra are promoting, is surrounded by the proposed allocation to the north and the east. The site is available and suitable for an allocation within the emerging Local Plan and Terra consider that the allocation should be extended to include this land and that the allocation figure should in turn be increased. This will help achieve the vision of the Local Plan and help boost the delivery of housing within the District, in line with the aspirations of the national government for the significant delivery of new homes in sustainable places.

##### *Policy HN01 Housing Need: Affordable Homes*

- 4.4 Terra agrees with the requirement for affordable housing to be delivered within new developments of 10 units and over.
- 4.5 The wording on Policy HN01 (f) is one which is onerous and does not allow for an alternative, preferable specification to be negotiated between parties. Therefore, we suggest that the reading of (f) should be altered to read as *Developers are expected to make efficient use of land and attempts to artificially reduce the scale of development to below the threshold for providing affordable housing will be reviewed on a case-by-case basis*. This allows for developments to reduce the scale of their development in order to provide community beneficial facilities, such as larger play space for local and future residents to enjoy.

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

- 4.6 Terra agree with the requirement for all housing to meet M4(2) Building Regulations in keeping with national technical standards.
- 4.7 The requirement for accessible homes within developments is something which Terra support, in principle.
- 4.8 Policy HN02 conforms to paragraph 135 (f) of the NPPF 2024, which states that developments should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.
- 4.9 5% minimum Market homes to meet M4(3)A regulations and 10% minimum Affordable homes to meet M4(3)B regulations within major developments is partially supported by Terra, in principle. However, the Council should

be aware of National Building Regulation requirements and be conscious not to double count with regards to separating the percentage of M4(3)A and M4(3)B requirements for Market and Affordable Housing.

- 4.10 It should also be noted that if the Council are to implement such a policy in the way outlined within their draft plan, they should allow reflection of this within cost viability assessments.
- 4.11 The implementation of such a policy may be a challenge from a viability and deliverability perspective, meaning that further flexibility would be favoured with regards to this policy in order to address these concerns. This is especially important given the mandatory delivery of 10% BNG throughout the UK affecting how viable and deliverable a scheme can be.
- 4.12 Whilst it is understood that there is a need for a mix of house types, tenures and sizes, it is important that such a policy is flexible and ensures that delivery of housing is not stalled due to overly prescriptive requirements that do not consider the scale and viability of sites. Terra politely request that the Council ensure that the Policy is flexibly applied to make allowance for home builders and developers to provide alternative housing mixes as required by the market.

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

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

### *Policy AP01: Development in Settlements*

- 4.15 Terra supports Policy AP01, outlining that development will be permitted on land adjoining the existing built-up areas of settlements and provides housing necessary to contribute to meeting the specific targets for housing in Small Villages established in Policy DS01 part 2 (e).
- 4.16 Allocating the site that Terra are promoting within the Local Plan will enable the Council to fulfil its obligations towards meeting the local housing needs.

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

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

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

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

*Policy DM06: Transport and Accessibility*

4.20 Terra agrees with the requirement to ensure developments are sustainably located with good transport networks and connections to provide safe access and movement.

4.21 The site that Terra are promoting has connections to sustainable public transport networks via local bus services available to local and future residents.

## **5. Conclusion**

Terra Strategic politely requests that these representations are taken into consideration. Land to the north of London Road and the A6, Oadby is readily available and deliverable within the desired timeframe. Terra recommend that the Council include the site within the emerging plan as an allocation for residential development.

I trust you have sufficient information to provide feedback. However, should any further points of clarification be required, please do not hesitate to contact me or my colleague [REDACTED]

Yours Sincerely,

