



CABINET – 18 MARCH 2025

RESPONSE TO PROPOSED SUBMISSION DRAFT (REGULATION 19) HARBOROUGH LOCAL PLAN 2020-2041

REPORT OF THE CHIEF EXECUTIVE

PART A

Purpose of the Report

1. The purpose of this report is to advise the Cabinet on the content of Harborough District Council's Proposed Submission Draft Harborough Local Plan 2020-41, and to set out the proposed response as the views of the County Council.

Recommendations

2. It is recommended that:
 - a) The County Council's response to Harborough District Council's Draft Local Plan consultation, set out in paragraphs 34 to 75 inclusive, and the appendix to this report be approved;
 - b) The Chief Executive, following consultation with the Cabinet Lead Member, be authorised to make any minor amendments to the consultation response prior to its submission to Harborough District Council by 6 May 2025.

Reasons for Recommendation

3. The County Council's response will set out key comments for consideration by Harborough District Council in progressing its new Local Plan. It seeks to ensure alignment with the Leicester and Leicestershire Strategic Growth Plan (SGP), and to influence the content of the Local Plan in the interests of local communities, including ensuring that the Local Plan provides an as robust as possible policy platform for securing the provision of the infrastructure and services required to support its successful delivery.

Timetable for Decisions (including Scrutiny)

4. The County Council's consultation response is required to be submitted to Harborough District Council ahead of the close of consultation on 6 May 2025.

Policy Framework and Previous Decisions

5. In 2018 the County Council, Leicester City Council, the seven district councils in Leicestershire, and the Leicester and Leicestershire Enterprise Partnership, approved the Leicester and Leicestershire Strategic Growth Plan (SGP) which provides the long-

term vision for planned growth for the area up to 2050. Both Market Harborough and Lutterworth are identified as being areas for managed growth in local plans.

6. The Leicester and Leicestershire Strategic Transport Priorities (LLTSTP) was approved by the Cabinet on 20 November 2020. This document has a plan period to 2050 and was developed by the County and City Councils alongside the SGP to ensure the long-term development needs and associated transportation requirements are co-ordinated.
7. In 2021, the Council and its partners (Leicester City Council, the seven district councils and the Leicester and Leicestershire Enterprise Partnership (LLEP)), commissioned the Leicester and Leicestershire Housing and Economic Needs Assessment (HENA). The HENA, published in June 2022, provides evidence that across Leicester and Leicestershire, the projected housing need from 2020 to 2036 is 91,400 dwellings and employment land need from 2021 to 2036 is 344 hectares.
8. In December 2021, the County Council became a signatory to a Statement of Common Ground (SoCG) relating to South Leicestershire Local Plan Making (November 2021), aligning the gathering of evidence and activity in the development of new local plans for three districts in the south of the County.
9. In September 2022 the Cabinet approved the County Council becoming a signatory to a Statement of Common Ground (SoCG) relating to Housing and Employment Land Needs (June 2022), setting out how the City Council's identified unmet needs would be accommodated in the County. Harborough District Council approved the SoCG at its Council meeting in December 2023.
10. In November 2022 the Cabinet received a paper setting out the financial implications for the Council of delivering sustainable and inclusive growth and the approach and principles that it is proposed the Council would adopt to address and manage these risks.
11. In February 2024 the Cabinet approved the response to Harborough District Council's Local Plan - Issues and Options Consultation, at Regulation 18 stage.
12. In October 2024 the Cabinet received a paper on the Strategic Planning Issues associated with the emerging Charnwood Local Plan. This included principles for future engagement of the Local Highways Authority in other local plan processes in light of the County Council's experience of the Local Plan for Charnwood Borough.
13. In December 2024 the Cabinet received a paper on the Provisional Medium Term Financial Strategy 2025/26 – 2028/29. This outlined that it is critical for Local Plans to be prepared with sufficient evidence to secure contributions and delivery for critical infrastructure and it is necessary for the district councils to work with the County Council to ensure Local Plans include policies that balance the need to support delivery of growth without exposing the County Council to further financial risk.
14. The Council's Strategic Plan (2022 to 2026) has five strategic outcomes, including 'Strong Economy, Transport and Infrastructure' and a 'Clean, Green Future' to ensure Leicestershire has the infrastructure to meet the demands of a growing population, whilst looking to tackle climate change, biodiversity loss and unsustainable resource usage.

Resource Implications

15. There are no resource implications arising from the recommendations in this report. The Council has committed significant resources to engaging in and supporting a collaborative approach to strategic planning, which is intended to facilitate the delivery of growth within the County and mitigate the negative impacts of development.
16. The Council's current Capital Programme includes over £200m to fund infrastructure projects that support growth in the County.
17. Delivering infrastructure (highways, schools and some community facilities) has required significant Council forward-funding and in the current financial climate this approach is no longer possible.

Circulation under the Local Issues Alert Procedure

18. This report will be circulated to all Members.

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PART B

Background

19. The current Harborough Local Plan was adopted by the District Council in April 2019 and covers the Plan period 2011 to 2031. It is a legal requirement that Councils review their Local Plan within five years of adoption, to decide whether the plan needs to be updated, either in whole or in part. A review of the Local Plan carried out by Harborough District Council in May 2021 concluded with the decision to begin the preparation of a new Local Plan.
20. This consultation from Harborough District Council is known as a 'Regulation 19' consultation and it builds on a previous Regulation 18 Issues and Options Consultation, to which the Council responded in February 2024.
21. It should be noted that at the time of writing, the Regulation 19 consultation is not yet out for formal consultation but the proposed Local Plan documents have been publicly available for some time. The consultation was approved at Harborough's Council meeting on 3 March 2025 and is due to commence on 10 March 2025 and close on 6 May 2025. If there are any amendments to these dates or the Plan and its supporting documents which may impact on the Council's proposed response, the Cabinet will be informed through a supplementary report or verbal update as necessary.
22. The key comments from the Council in relation to the Regulation 18 conclusion included that there was broad agreement with strategic matters identified by the district council, but that there should be additional considerations including reference to recent strategic planning and evidence work undertaken and a stronger emphasis on sustainable transportation and infrastructure planning. Comments also referenced how this Local Plan should be clearer on how it would be pivoting towards the delivery of the Strategic Growth Plan Housing Market Area spatial strategy and the Priority Growth Corridor.
23. In December 2024 a new National Planning Policy Framework was published. This included setting out transitional arrangements for new Local Plans. This Local Plan has been prepared and will be examined under the December 2023 National Planning Policy Framework (NPPF) in accordance with the transitional arrangements set out in Appendix 1 of the December 2024 NPPF. This states that for plans that have reached Regulation 19 on or before 12 March 2025 and the housing requirement provided for within the plan is at least 80% of local housing need, the plan will be examined under the previous version of the NPPF. These circumstances apply to this Local Plan.
24. Comments received will inform the District's policy recommendations ahead of submission of the Local Plan to the Secretary of State. It is currently expected that the Local Plan Examination (part of the statutory process prior to formal adoption) will be held mid-2026.

Duty to Co-operate

25. It is recognised that should a Housing Market Area (HMA) authority identify, quantify and provide robust evidence to demonstrate an unmet need, it is incumbent upon the HMA authorities to jointly resolve any cross-boundary matters with HMA partners under the Duty to Cooperate, set out in the Localism Act 2011 and National Planning Policy Framework (NPPF) (both the December 2023 and 2024 iterations). The duty remains in place until such point Government determines otherwise.

26. Without a clear aligned approach to delivery, Leicestershire faces high levels of speculative/indiscriminate development with the consequent high risk of inadequate highway and education infrastructure provision. To avoid this, ongoing commitment from all the local authorities to joint working is therefore crucial, as is their support for a collaborative and coordinated approach to the defining and allocating of infrastructure funding requirements of Local Plans.
27. The Statement of Common Ground relating to Housing and Employment Land Needs (June 2022) for the Leicester and Leicestershire area was guided by the [officer] Strategic Planning Group and Members' [Planning] Advisory Group which consisted of representatives from the County Council, Leicester City Council, and the seven district councils. The SoCG sets out the City Council's identified unmet need of 18,700 homes and 23 hectares of employment land for the period 2020-2036 to be accommodated in the County. The SoCG was agreed by all partner authorities and was signed by Harborough District Council in December 2023.
28. The Charnwood Local Plan 2021-2037 Examination is ongoing, however Inspectors have confirmed in writing, following hearing sessions in October 2022, that they have "no reason to disagree with the HENA's [Housing and Economic Need's Assessment] conclusion that the standard method establishes a minimum local housing need of 91,408 dwellings across the Housing Market Area (HMA) to 2036...Based on the evidence at this stage and pending further testing of housing delivery through the Leicester Local Plan Examination, we consider that a figure of 18,700 dwellings represents a reasonable working assumption for the scale of Leicester's unmet housing need from 2020 – 2036."

Overview of content of the Submission Draft Harborough Local Plan

29. The proposed Local Plan covers the period 2020 to 2041 and will wholly replace all policies in the adopted Harborough Local Plan (2011-2031).
30. The Plan seeks to bring forward 14,839 dwellings over that period to meet a housing requirement of 13,182 homes.
31. The spatial strategy focuses predominantly on the Leicester Urban Area and Market Harborough, reflecting higher levels of existing or potential accessibility to public transport.
32. In addition to the delivery of existing housing commitments, completions and allowance for windfalls, land for at least 6,442 new homes (approximately 360 a year) are planned to be delivered in the following areas:
 - 2,450 homes in the Leicester Urban Area (including 1,200 in the Land South of Gartree Road Strategic Development Area and 1,125 in Scraptoft)
 - 1,670 homes in Market Towns (1,350 in Market Harborough and 320 in Lutterworth)
 - 1,500 in Large Villages (including 475 in Broughton Astley, 475 in Kibworth and 400 in Great Glen)
 - 452 in Medium Villages (including 105 in Husbands Bosworth, 104 in Houghton on the Hill and 100 in Great Bowden)
 - 350 homes in Small Villages (including 49 at Dunton Bassett)
33. The employment land requirement for Harborough District is 60 hectares over the plan period.

Overarching response to the Submission Draft Harborough Local Plan

34. At this stage of local plan-making, the comments of the Council need to focus on compliance and tests of soundness. Paragraph 35 of the NPPF (December 2023 – the version under which this Local Plan will be examined) sets out that for a Local Plan to be found ‘sound’ it needs to be Positively Prepared, Justified, Effective, and Consistent with National Policy.
35. The Council’s position can be summarised as follows:
- Following suggestions made by County Officers, the Council welcomes a number of the amendments made to the Draft Plan as it has emerged since Regulation 18 stage. However, it is considered that there are still substantives issues associated with the Plan’s evidence base.
 - As the Local Transport Authority, the Council considers that the Plan in its current form fails to meet the NPPF tests of soundness insofar both its Effectiveness and Consistency with national policy.
 - A number of policies require updating to reflect required land and monetary contributions to deliver necessary education provision.
 - It is considered that the Plan could include clearer definitions around health and health inequality to set the tone for the health content in the Plan.
 - Reference to the importance of and support for Neighbourhood Plans is welcomed.

Comments of the Local Transport Authority (LTA)

Overarching contextual comment

36. The LTA recognises the importance of a Plan-led approach. It represents the best opportunity to seek to meet the needs of Leicester and Leicestershire’s growing and changing population in a managed way. The LTA therefore continues to commit significant resources to support district councils in the successful development and adoption of Local Plans, including to seek to ensure that sustainable growth is delivered in reality and that there is a robust policy basis for it to seek developer contributions and Government funding towards transport interventions required to enable growth.
37. The LTA also recognises the significant challenges and pressures that Plan Making Authorities, such as Harborough District Council, face. This given the Government’s ambitions for planning reform and Local Plan coverage, and its intention/mission that 1.5 million new homes should be delivered within the lifetime of this Parliament. However, such pressures and challenges should not be taken as reasons for supporting any Local Plan regardless.

Key transport comments

38. **General Spatial Strategy:** In broad terms, the Plan seeks to focus growth at key locations, with a particular focus on the A6 corridor, especially in terms of housing:

- To the south and east of Leicester, on the edge of Oadby, with a total of 3150¹ homes. These fall within the Leicester and Leicestershire Strategic Growth Plan (SGP) to 2050 'Priority Growth Corridor' (PGC).
 - To the north of Market Harborough, with a total of 1700 homes proposed to be allocated across three sites.
 - At Great Glen and the Kibworth's, with circa 900 homes proposed in total.
 - Circa 13 ha of employment, spread across allocation sites adjacent to Oadby; at Kibworth; and at Market Harborough.
39. In principle the concept of a more geographically focused approach to growth – as opposed to the scattering of relatively smaller scale sites across a wide geographic area – is supported by the LTA. However, the specific site allocation proposals set out in the Plan give rise to issues as set out further below in the LTA's comments.
40. **Supporting the delivery of the Leicester and Leicestershire Strategic Growth Plan to 2050** The LTA recognises the key role that this Plan has to play in pivoting the Leicester and Leicestershire Housing Market Area towards the spatial vision set out in the SGP. And to a certain extent, the Plan gives some effect to that pivoting by proposing to bring forward growth in the PGC.
41. However, besides that, the Plan as it stands pays only cursory reference to the SGP; it is not a golden thread that runs through it. There is nothing in the policy framework that would give a basis for the Local Planning Authority, the County Council as the LTA (or as a wider service provider) or any other relevant body to ensure/to require that developers bring forward the growth proposed on the edge of Oadby in such a way as to positively enable the PGC's wider, longer-term development, let alone to safeguard against the prospect of the growth being delivered in such a way as to fetter or frustrate the PGC's wider delivery from a transport perspective².
42. Whilst this issue might fall without the Local Plan tests of soundness, e.g. because the SGP is a non-statutory document, it should be a concern to partners across the wider Leicester and Leicestershire Housing Market Area if sites in the district of Harborough are delivered in such a way that it comprises delivery of further future growth in the PGC, and by extension undermines the SGP's delivery.
43. However, there are other significant factors that affect the Plan from a transport perspective, which do appear to be material in terms of considerations of the Plan's soundness. These are set out in the following paragraphs.
44. **Position with regard to the development of transport evidence:** No separate transport testing (transport modelling) of the Plan's proposed spatial strategy has been undertaken. But it has, in general terms, been tested as part of wider work looking at the transport impacts of growth across the south of Leicestershire³.

¹Which is part of a cross-boundary site including growth of 850 homes proposed to be allocated in the next Oadby and Wigston Local Plan, giving an overall total of circa 4000 homes. The response to the Oadby and Wigston Local Plan Regulation 19 Consultation was considered by the Cabinet at its meeting in February.

² To provide some context to this risk. The SGP cites that the PGC is estimated to have the potential to deliver around 38,000 new homes to 2050.

³ South Leicestershire Joint Transport Evidence (JTE). The JTE has its genesis in the completion of the South Leicestershire Local Plan Making Statement of Common Ground, which the Cabinet agreed the County Council to become a signatory to in [December 2021](#). It covers the districts of Harborough, Oadby and Wigston, Blaby and Hinckley and Bosworth.

45. A report on Stage 1 of the JTE work has been published by the district council as part of the Plan's evidence base. Emerging evidence from that wider study work is showing that growth in the district combined with proposed growth elsewhere across the south of Leicestershire, most notably in the district of Oadby and Wigston, will have a significant impact on the district's road network. This includes cumulative and cross-boundary impacts, including on routes within the district of Oadby and Wigston and the City of Leicester. Most notably, those impacts include (with reference to Figure 1):
- Adding to existing traffic issues on the A6 (and other routes) through the Kibworth's (1); but perhaps more significantly
 - Congestion on the A6 corridor through the Kibworth's and in Oadby is leading to a 'haloing effect' of (relatively longer-distance) trips, whereby traffic is avoiding routes through the Leicester Urban Area by using lower class rural routes around the east of the Area, including the B6047 (2); via Stoughton (2a); and routes north of the A47 towards the Thurmaston Syston area and the A46(N), including through communities such as Houghton on the Hill, Keyham and Barkby and Beeby (2b); and
 - Likewise a similar effect to the south of Leicester, including impacting on lower class rural routes through communities such as Saddington and, via Shearsby Crossroads, Gilmorton across towards Lutterworth and M1 J20 (3).

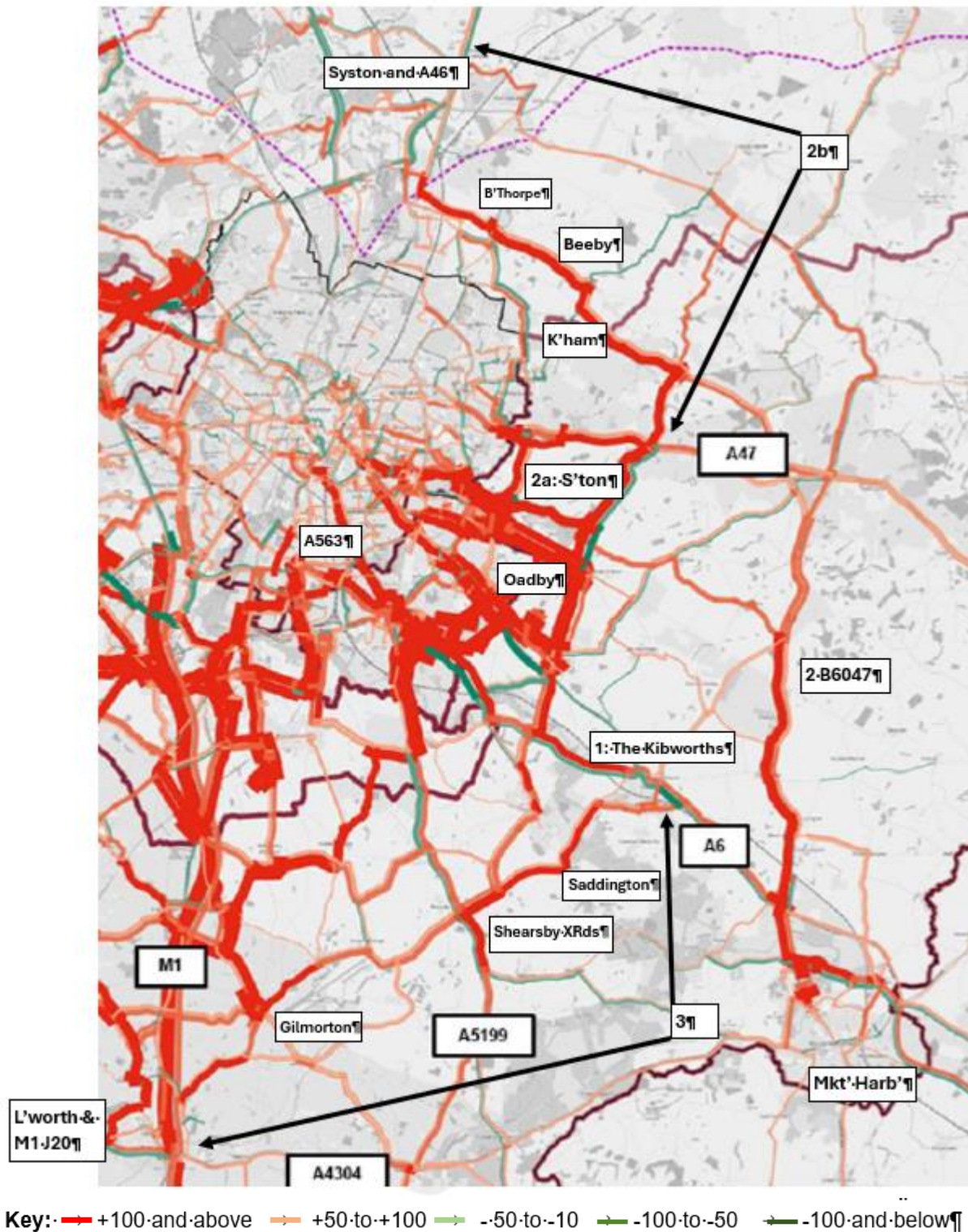


Figure 1: Flow differences (2041)

46. Without mitigation, these impacts might be considered as being severe, as per paragraph 116 of the National Planning Policy Framework (December 2024). Additionally, from an asset management perspective the impacts will increase levels of damage to routes that were never designed to be used by such volumes of traffic. Further, it has implications for the health and well-being of local communities.

47. The evidence serves to highlight the lack of suitable orbital transport connectivity links around the east and south of Leicester⁴. 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.
48. However, at this time the south Leicestershire JTE work is not at a stage where the contents of any package of strategic transport measures is confirmed. Thus the LTA is not yet in a position to reach a definitive view on the extent to which the Plan as currently drafted may or may not fetter/frustrate any package's delivery. This gives rise to potential/likely risks; for example policy SA02 relating to the proposed housing allocation on the edge of Oadby presently makes no reference to the site falling within the SGP PGC and the importance of getting the delivery of it 'right' in terms of enabling the PGC's wider future delivery.
49. From the LTA's perspective, this is an issue of the Plan's evidence base not being sufficiently mature at this time and thus, by extension, it has an incompletely developed policy framework. This raises questions as to the Plan's soundness, i.e. in terms of the effectiveness of its delivery.
50. Aside from the JTE Stage 1 report, the district council has also published its own Harborough Strategic Transport Impact Assessment (HSTIA). The LTA had no input to the development for the brief for this piece of work.
51. The LTA has no doubt (and for the avoidance of doubt is not questioning) that the consultants acting for the district council in the preparation of the HSTIA have performed competently and in good faith to fulfil the brief issued to them by the district council. But, the contents of the HSTIA remain of concern to the LTA. In particular:
- Data about the impacts of growth on the A6 corridor appears to have been presented without full analysis and proper context. It therefore appears to give a misleading impression that the impacts will not be material. Consequently, placing this information in the public domain risks significantly undermining the LTA's ability to deal with such matters as and when allocation sites come forward through the development management system.
 - The way by which possible levels of developer contributions have been ascribed towards particular mitigation measures does not appear to be a lawful mechanism in reality. This is based on the legal challenges to the previously intended Interim Charnwood Contribution Strategy, as reported to the Cabinet in October 2024.
52. **Position with regard to the Plan's underlying transport strategy:** To a certain extent the Plan as drafted contains welcome aspects in terms of seeking to address the transport impacts of proposed allocation sites; for example, some (but not all) site allocation policies include references to the need for a transport assessment.
53. However, the Plan as a whole lacks any coherent approach to seeking to address the issue of its transport impacts overall. For example:

⁴ This in comparison to the west and north of Leicester, where the A563 Outer Distributor Road is complete and there is the A46 Leicester Western Bypass.

- The policies are currently weakly worded in terms of providing a robust basis for the coordinated delivery of transport measures required to address the Plan's cumulative transport impacts, particularly on the A6 corridor.
 - In respect of the growth proposed on the edge of Oadby, the policies are similarly weak in terms of the delivery of transport measures without the district i.e. to address cross-boundary impacts such as within and through the district of Oadby and Wigston and within the City of Leicester.
 - Policies that reference or relate to transport are fairly generic; for example, there is no proper integration of the Market Harborough Transport Strategy (or Multi-Modal Area Investment Plan as it will morph into) nor consideration of the potential need for an expansion of the South of Leicester Local Cycling and Walking Infrastructure Plan.
54. The absence of a coherent policy approach to dealing with the Plan's transport impacts, in particular along the A6 corridor, risks undermining its effective delivery and could have wider implications for the effective delivery of emerging Local Plans in adjoining areas, most particularly in the district of Oadby and Wigston.
55. It also does not comply with the County Council's third local plan engagement principle approved by the Cabinet in October 2024, i.e. the Plan does not have sufficient policies to reflect the challenges of that plan, specific to highways and transport.
56. Furthermore, at present the Plan lacks any coherent approach to seeking to secure developer contributions towards the delivery of transport measures necessary to address cumulative and/or cross-boundary impacts. (This is different from the concern expressed in paragraph 51 about the way possible levels of contributions have been calculated.)
57. Experiences with the Charnwood Local Plan have demonstrated the legality issues involved with seeking to collect Section 106 contributions towards transport measures required to deal with cumulative impacts, even where there is a clear strategy approach supported by clearly worded Plan policies. Essentially such contributions have to be considered against the 'CIL tests' and to be lawful it must be possible to demonstrate that they are:
- (a) Necessary to make the development acceptable in planning terms;
 - (b) Directly related to the development; and
 - (c) Fairly and reasonably related in scale and kind to the development.
58. The meeting of these tests can be difficult to evidence, especially where a location of cumulative transport impact is remote from the sites that are contributing to that impact. (For example in this case, where growth on the edge of Oadby is contributing towards traffic conditions that give rise to the impacts highlighted in paragraph 45 and Figure 1.)
59. In comparison to experiences with the Charnwood Local Plan, the cumulative impacts arising from this Plan are relatively more focused and primarily on the A6 corridor. Nevertheless, the absence of a coherent approach towards securing developer contributions still poses a further significant risk to the Plan's effective delivery.
60. It also does not comply with the County Council's fifth engagement principle, i.e. where evidence demonstrates significant cumulative impacts arising from planned growth, the appropriate delivery mechanism for infrastructure which is critical to the successful

delivery of the Plan's growth is a Community Infrastructure Levy (CIL), which should be developed concurrently with a Local Plan if it is to receive the support of the County Council.

61. **Proposed allocation of further Strategic B8 Warehousing:** The Plan proposes a significant further allocation of land (circa 140 ha in total across two sites) for additional strategic (logistics) warehousing in the Magna Park area.
62. The LTA recognises the importance of the logistics sector not just to the economy of Leicestershire but to the United Kingdom more widely. (And the sector's vital importance to maintaining a functioning society was demonstrated during the pandemic.) Accordingly, over many years the LTA has been pro-active in working to support the growth of Magna Park whilst seeking to minimise its traffic impacts on local communities (both in Leicestershire and more widely, including in Warwickshire).
63. The A5 is part of the Strategic Road Network (SRN) for which National Highways (NH) is the Highway Authority, and who ultimately are empowered and funded by the Department for Transport (DfT). And it is the poor functioning of the A5, most particularly the Gibbet Hill Roundabout and the Cross in Hand Roundabout in the context of Magna Park, that has material implications for the ability to deliver further strategic scale logistics growth in this area.
64. Evidence available from the JTE work highlights that further strategic growth at Magna Park (i.e. additional to that already *consented*) will have, inter-alia, a material impact on levels of traffic seeking to use the SRN. It further demonstrates that without sufficient mitigation, the inability of the junctions to function effectively is forecast to cause traffic to divert away from the A5 corridor on to lower order roads, with impacts on communities such as Claybrooke Magna, Bitteswell and Lutterworth, and on communities in Warwickshire, too. (With implications as outlined in paragraph 46.)
65. From the LTA's perspective, the evidence clearly demonstrates that a strategic scale improvement is required at least at the Gibbet Hill junction in order for further strategic scale logistics growth to be delivered in the Magna Park area; the scale of scheme required is beyond that which a developer(s) could be expected to deliver and/or reasonably be required to do so in respect of the CIL tests.
66. NH is engaged with the LTA (and its Warwickshire counterpart) in work to explore possible ideas for a strategic scale improvement at the Gibbet Hill junction. But given the current way that NH is empowered and funded by the DfT it is unable to act to prepare and deliver a scheme at a pace necessary to enable the Plan's effective delivery; essentially, if nothing changes it appears that the delivery of a strategic scale improvement is at the very least 10 to 15 years away even if public funding for it were to be confirmed 'tomorrow'. (For the avoidance of doubt, NH has been clear that no funding commitment exists.)
67. This is a real-life, practical example of the infrastructure planning and spatial problem that was highlighted to the Cabinet in September 2024 as part of the Authority's response to consultation on the National Planning Policy Framework reform, viz:

"...the fundamental issue is that the approach to planning for future population growth is broken from a transport, highways and broader perspectives. The scale of infrastructure requirements is increasingly beyond that which Local Plan development sites can afford from a viability perspective and thus would render a Plan financially unviable. Public investment, be that through monies awarded to

LTA's or via National Highways, bears no resemblance to the delivery of real homes and jobs on the ground, either in terms of quantum, timing or the approach to business case development."

68. It is acknowledged that this is a national problem that requires action by the Government to resolve; it is beyond the gift of the LTA and the district council to address through a Plan making process. Nevertheless, in the light of the evidence and given that the LTA has no confidence that NH will be able to bring forward a strategic scale improvement within the Plan's lifetime, it would not be in the best interests of Leicestershire communities for the LTA to support this aspect of the Plan in the current circumstances.
69. The absence of any confirmed approach to the delivery of the SRN improvements necessary to deliver further logistics growth in the Magna Park area poses a significant risk to the Plan's effective delivery. Indeed, the LTA is aware that Inspectors considering the Stroud Local Plan have recently written to Stroud District Council⁵ advising it to withdraw its Plan on the grounds that they have no confidence that the SRN improvements necessary to enable that Plan's delivery can be achieved within the Plan's lifetime.
70. **Delivery of sustainable development in accordance with the National Planning Policy Framework (NPPF):** In broad terms, from a transport perspective, many of the allocations proposed within the district might be viewed as being in sustainable locations due to their (relatively) close proximity to ranges of services. Nevertheless a strategy and an effective delivery/funding approach is still necessary to achieve the delivery of the active and sustainable transport interventions necessary actually to provide sufficiently attractive alternative means of travel to the car to where people want to get to.
71. However, whilst on the one hand there are some welcome policy aspects in respect of the provision of active and sustainable travel, including some that reference cycling, walking and passenger transport, the absence of an overall coherent policy approach to dealing with the Plan's transport impacts appears to run a significant risk that this will likewise result in the delivery of piecemeal, uncoordinated active and sustainable transport measures that are not sufficiently attractive to encourage and enable modal shift away from the car in reality.
72. It is questionable therefore the extent to which the Plan as it currently stands is consistent with the NPPF in terms of the delivery of sustainable development.
- In terms of the previous version of the NPPF (December 202~~3~~³ revision) it does not appear to be consistent with, inter-alia:
 - Paragraph 110(c) and (d) as it fails to identify and protect sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development, nor does it draw on LCWIPs to provide for attractive and well-designed walking and cycling networks.
 - With the new version of the NPPF (December 202~~4~~⁴) coming into immediate effect for decision making purposes (determining planning applications), in accordance with paragraph 109, a vision-led approach should be used to identify transport solutions that deliver well-designed, sustainable and popular places. The Plan's current

⁵ <https://www.stroud.gov.uk/media/qsbb4fjl/id-018-stroud-dlp-letter-from-inspectors-07-february-2025.pdf>

absence of a locally specific policy basis for achieving such is likely to result in complications and challenges in seeking to implement the NPPF's requirements through the development management process.

73. The Plan at present also does not comply with the sixth, seventh and eighth of the County Council's engagement principles, i.e. in that active and sustainable travel provision has not been fully and properly considered through the Plan and its development, bringing significant risk that the car will be the mode of travel choice for access to key services and facilities.

LTA concluding comments

74. The LTA acknowledges that there are certain helpful aspects to the Plan in terms of dealing with clusters of sites; assessing transport impacts of allocation sites; and in respect of seeking to promote access to sites by active and sustainable travel.
75. However, it is the LTA's view that this is insufficient to outweigh the significant factors that affect the Plan from a transport perspective. The LTA considers that the Plan in its current form fails to meet the NPPF tests of soundness insofar of its:
- Effectiveness, that is:
 - It fails to provide a coherent policy basis to ensure that transport interventions necessary to enable the Plan's site allocations delivery are deliverable over its time period, especially in respect of interventions necessary to deal with cumulative and cross-boundary transport matters; rather this seemingly has been deferred to the development management process;
 - The delivery of elements of the Plan's spatial strategy are dependent on strategic scale improvements to the SRN, but the LTA has no confidence that such will be brought forward and delivered within the Plan's time period; and
 - It lacks any coherent, (likely) lawful policy approach to seeking to secure developer contributions towards transport measures that will be required to address cumulative and/or cross-boundary transport impacts, particularly on the A6 corridor.
 - Consistency with national policy: It provides no coherent policy basis for enabling the coordinated delivery of transport interventions to achieve sustainable development in reality.

Equality Implications

76. There are no equality implications arising from the recommendations in this report. Harborough District Council is working with the County Council and with other partners in the Leicester and Leicestershire Housing Market Area to provide for the homes and jobs required in the future.

Human Rights Implications

77. There are no human rights implications arising from the recommendations in this report. Harborough District Council is working with the County Council and with other partners in the Leicester and Leicestershire Housing Market Area to provide for the homes and jobs required in the future.

Environmental Implications

78. The County Council will continue to work closely with Harborough District Council and other partners to minimise the impact of the planned growth on the environmental assets of Leicester and Leicestershire.
79. The impact upon the environment is a key consideration in all planning decisions made within the context of an approved or emerging Local Plan, and the County Council will seek to ensure that opportunities are taken to enhance the environment through biodiversity net gain and sustainable forms of development.

Partnership Working and Associated Issues

80. The County Council works closely with the Leicester and Leicestershire Strategic Planning Partnership, which includes Harborough District Council, the other six district councils in Leicestershire, Leicester City Council and the Leicester and Leicestershire Business and Skills Partnership. A strengthening of partnership working is sought to deal with the transport challenges which require a strategy-led approach with multiple partners across Leicester and Leicestershire and the wider area.

Background Papers

Harborough Local Plan 2011-2031

<https://bit.ly/4kadfeC>

Report to the Cabinet on 23 November 2018: Leicester and Leicestershire Strategic Growth Plan – Consideration of Revised Plan for Approval

<https://bit.ly/3FbUsNL>

Report to the Cabinet on 20 November 2020: Leicester and Leicestershire Strategic Transport Priorities 2020 to 2050

<https://bit.ly/3Uj5oxc>

Report to the Cabinet on 20 November 2020: Draft City of Leicester Local Plan 2020 to 2036

<https://bit.ly/3Uj5oxc>

Report to the Cabinet on 22 June 2021: Urgent action taken by the Chief Executive in relation to the Leicester and Leicestershire Statement of Common Ground relating to housing and employment land needs (March 2021)

<https://bit.ly/3ueF6S8>

Report to the Cabinet on 14 December 2021: South Leicestershire Local Plan Making Statement of Common Ground (November 2021)

<https://bit.ly/4gY3UEg>

Report to the Cabinet on 23 September 2022: Leicester and Leicestershire Authorities – Statement of Common Ground relating to Housing and Employment Land Needs

<https://bit.ly/3EbMySG>

Report to the Cabinet on 25 November 2022: Managing the Risk Relating to the Delivery of Infrastructure to Support Growth

<https://bit.ly/3EN8P9Z>

Report to the Cabinet on 22 October 2024: Strategic Transport Planning Issues Associated with the Emerging Charnwood Local Plan

<https://bit.ly/4h6lZR3>

Report to the Cabinet on 9 February 2024: Response to Harborough District Council's Local Plan – Issues and Options Consultation

<https://bit.ly/41qSt3n>

Appendix

Leicestershire County Council Further Response to the Proposed Submission Draft (Regulation 19) Harborough Local Plan 2020-2041