

Matter 3: Amount and Distribution of Development

Whether the Amount and Distribution of Development is positively prepared, justified, effective and consistent with national policy?

Issue 1: Spatial Strategy

Question 1

- 1.1.1. No. It is understood that the reasoning for including the Land South of Gartree Road (LSGR) Strategic Allocation in the spatial strategy is to align the Plan with the Leicestershire Strategic Growth Plan (SGP)¹. Whilst the Local Plan does refer to the spatial strategy being aligned with the SPG (paragraphs 3.2 to 3.8, and paragraph 3.7 in particular), there is no reference in Policy DS01 or its reasoning to the SGP.
- 1.1.2. It is also understood that part of the reasoning for proposing the LSGR Strategic Allocation was because it was thought that it offers the greatest opportunity to deliver strategic highway infrastructure (see reference to the Minutes of HDC's Extraordinary Cabinet Meeting on 20 February 2025², referred to in STNT's Regulation 19 Representations). This is not referred to in the Submission Version Local Plan.

Question 2

- 1.1.3. STNT considers that the spatial strategy in the Plan, and in particular the focus of significant amount of development to the south east of Leicester, is not an appropriate strategy, particularly when other reasonable alternatives have not been

¹ <https://www.llstrategicgrowthplan.org.uk/wp-content/uploads/2019/01/Final-LL-SGP-December-2018-1.pdf>

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<https://cmis.harborough.gov.uk/cm5/Document.ashx?czJKcaeAi5tUFL1DTL2UE4zNRBcoShgo=0jr4WOzi6ZwT%2fAjUJ6dD%2b%2ffPnPUv%2fl%2fkWm0eZh7EW3QNZgGvk8WLlw%3d%3d&rUzwRPf%2bZ3zd4E7lkn8Lyw%3d%3d=pwRE6AGJFLDNlh225F5QMaQWCtPHwdhUfCZ%2fLUQzgA2uL5jNRG4jdQ%3d%3d&mCTIbCubSFfXsDGW9lXnl%3d%3d=hFfIUdN3100%3d&kCx1AnS9%2fpWZQ40DXFvdEw%3d%3d=hFfIUdN3100%3d&uJovDxwdjMPoYv%2bAJvYtyA%3d%3d=ctNJFf55vVA%3d&FgPIIEJYlotS%2bYGoBi5oIA%3d%3d=NHdURQburHA%3d&d9Qjj0ag1Pd993jsyOJqFvmyB7X0CSQK=ctNJFf55vVA%3d&WGewmoAfeNR9xqBux0r1Q8Za60lavYmz=ctNJFf55vVA%3d&WGewmoAfeNQ16B2MHuCPMRKZMwaG1PaO=ctNJFf55vVA%3d>

considered by the Council, and it considers that the Plan's evidence base does not support the strategy. Reasoning is provided below.

Not an Appropriate Strategy Considering Reasonable Alternatives

- 1.1.4. As set out in STNT's Regulation 19 Representations, the SGP was based on a scenario of delivering a new bypass from the A46 to the east of Leicester. The SGP considered a spatial strategy where this new bypass would open-up land for housing and employment development, and, in turn, that development may partly finance the delivery of the bypass. The SGP did not consider any alternative spatial strategy that either may not require the delivery of this infrastructure, or an alternative strategy that could deliver that infrastructure.
- 1.1.5. The A46 bypass is no longer being proposed, with Midlands Connect abandoning the proposals in 2020, partly due to cost implications and partly because transport priorities have changed to focus on infrastructure to the west of Leicester. The bypass was fundamental to unlocking the development potential around the south and east of Leicester, by providing critical orbital connectivity with a view to relieving congestion. The evidence base to the SGP³ is clear that the SGP spatial strategy is reliant on strategic transport investment over and above that identified by Midlands Connect. This shows that the SGP spatial strategy is reliant on an orbital route to the south of Leicester. Without this critical infrastructure, the justification for the SGP spatial strategy falls away. The purpose of the A46 Expressway was to allow traffic to disperse and use multiple arterial routes into the LUA. Instead, without that route, development in the growth corridor proposed by the SGP would be reliant on inadequate transport infrastructure, namely the A6. The inadequacy of the existing transport network to the south east of Leicester is referenced in STNT's Regulation 19 Representations. However, to summarise, the A6, which is the key arterial route into the LUA is subject to substantial congestion. This is a long-standing issue and

³ Paragraph 7.2.4 and 7.2.5 of [SGP Strategic](https://www.l1strategicgrowthplan.org.uk/wp-content/documents/pdf_document/evidence_base/SGP_Strategic-Assessment-of-Transport-Impacts_v5.pdf)https://www.l1strategicgrowthplan.org.uk/wp-content/documents/pdf_document/evidence_base/SGP_Strategic-Assessment-of-Transport-Impacts_v5.pdf

has been identified in the following evidence documents, stretching back over at least a 15-year period:

- Harborough District Council's (HDC) 2009 Transport Study Addendum⁴
- The joint HDC and Leicestershire County Council (LCC) Cumulative Development Traffic Impact Study (2017)⁵
- HDC's 2018 Transport Topic Paper⁶
- The South Leicestershire Joint Transport Evidence Study Stage 1 (2025)⁷.

1.1.6. Therefore, development following the SGP spatial strategy, without significant new highway infrastructure is highly likely to exacerbate highway and transport issues. However, the Harborough Local Plan continues to focus its spatial strategy on the SGP, as evidenced by paragraphs 3.2 to 3.8 of the Local Plan, and page 3 of the 2025 Development Strategy Paper (Examination Library Ref: PRE-NLP4), which confirms that the reasoning for selecting the housing options in the Local Plan, and hence the spatial strategy, is the SGP and the growth corridor to the south of Leicester proposed in the SGP.

1.1.7. HDC has stated in its response to Panel Note 6 (Examination Library Ref: HDC6) that the spatial strategy and allocations to the south and east of Leicester are not dependent upon the delivery of an orbital route (A46 Expressway referred to in the SGP) and that the spatial strategy is based on delivering growth in sustainable locations close to the LUA and the Plan's settlement hierarchy. However, this contradicts with the 2025 Development Strategy Paper which is clear that the spatial strategy is based on the SGP and therefore, as the A46 Expressway was crucial to

⁴ https://www.harborough.gov.uk/download/downloads/id/286/addendum_ldf_transport_reportpdf.pdf

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https://www.harborough.gov.uk/download/downloads/id/6511/air_quality_annual_status_report_2020_-_appendix_c6_cumulative_development_traffic_impact_study.pdf

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https://www.harborough.gov.uk/download/downloads/id/4253/tpc4_topic_paper_transport_march_2018.pdf

⁷

https://www.harborough.gov.uk/download/downloads/id/8924/south_leicestershire_joint_transport_evidence_study_stage_1.pdf

SGP spatial strategy, it must be crucial to the Local Plan spatial strategy. Policy SA03 in the Local Plan also requires the development of the LSGR to safeguard a future route for an orbital route to the south of Leicester. This shows that HDC consider that such a route is necessary. Furthermore, as referred to in response to Question 1, part of the reasoning for allocating the LSGR Strategic Site was so that it could deliver the necessary infrastructure to make development in this location sustainable. As set out in STNT's Regulation 19 Representations, there are serious doubts that the allocation would be able to deliver such infrastructure for viability reasons, further compounding that the spatial strategy is not appropriate.

- 1.1.8. However, STNT considers that the delivery of such infrastructure would not be viable in the absence of a programme and funding for its delivery, as set out in its Regulation 19 Representations and its Matter 6 Hearing Statement. Therefore, it is inevitable that the spatial strategy in the Local Plan would result in severe highway impacts. Whilst the spatial strategy is based on a mix of distribution options RO2 and RO3 in the Plan's Sustainability Appraisal (SA), as set out in its Matter 1 Hearing Statement, STNT considers that assessment to be flawed and the negative impacts of those options to be understated.
- 1.1.9. In light of the above, STNT considers that the spatial strategy in the Local Plan is not an appropriate strategy, even before reasonable alternative strategies are considered.
- 1.1.10. STNT's Regulation 19 representations (and early submissions by STNT and other groups to HDC and other Leicestershire Councils) have promoted 2 alternatives to the spatial strategy in the Submission Version Local Plan:
 - 1) Development to the south west of Leicester (referred to as the WWRA option in STNT's Regulation 19 Representations); and
 - 2) Focusing development on the edge of smaller settlements in settlement hierarchy on sites identified as being sustainable in the SHELAA, similar to Option 2 (Proportional Growth) considered in the SA.

- 1.1.11. The reasoning for why these alternative strategies are more appropriate than the spatial strategy in the Plan is provided in response to Question 3.

Conflicts between Strategic Policies in the Plan

- 1.1.12. STNT considers that the spatial strategy in the Plan results in significant inconsistencies and conflicts between the strategic policies in the Plan.

- 1.1.13. With the spatial strategy based on the SGP and focusing development to the south east of the LUA, there are significant conflicts with the following policies:

- Part 1(a) of Policy DS03 requires development to be in locations that priorities active travel modes, including public transport. As referred to above, without the A46 Expressway or other significant highway interventions, development to the south and east of Leicester would be subject to significant congestion, particularly on and in proximity to the A6. This congestion does not make the use of public transport (with buses being the only option in this location) convenient or attractive. Whilst now dated, The 2009 HDC Transport Study identifies significant delays spreading from the “ripple” effect of congestion on the A6. It acknowledged that bus capacity in this location and poor infrastructure detract from the efficiency of the public transport offer (Page 10). Development in this location would be reliant on new highway infrastructure and improved public transport capacity in order to comply with Policy DS03, and as stated in STNT’s Regulation 19 Representations, there are concerns that the developments in this location would not be able to deliver such interventions without external programmes and funding, which do not exist. With the development in this location not being able to be supported by the necessary infrastructure, it would also conflict with Policy DS05.
- Part 2 of Policy DS03, which requires the protection of Local Wildlife Sites (LWS). The area to the south east of Leicester contains several LWS, including one in the location of the LSGR Strategic Site. Development in this location

has the potential to compromise the integrity of the LWS, both through direct harm and severing connectivity corridors.

- As set out in STNT's Matter 5 Hearing Statement, development to the south east of Leicester would significantly harm the character of Great Glen and Stretton Hall by compromising the effectiveness of the Area of Separation in this location and changing the character of those settlements from isolated / stand-alone rural / semi-rural settlements into a continuation of the suburban built up area of Oadby, conflicting with Part 2 of Policy DS04.
- Policy DS04 also requires development to avoid the erosion of the historic environment. The south east of Leicester contains several historic assets. The assessment of the LSGR Strategic Allocation in the Site Selection Methodology Stage 4 Technical Assessments (Appendix 4 to Examination Library Ref: PRE-NLP5) identified a high risk of significant impacts to heritage assets and archaeology in this location, including at least 15 Listed Buildings and a Scheduled Ancient Monument. Development in this location is therefore likely to conflict with this policy.

1.1.14. Given the above significant conflicts with strategic policies in the Plan, the spatial strategic is not an appropriate strategy.

Evidence Base

1.1.15. The spatial strategy is not supported by a robust, up-to-date evidence base because it relies on the SGP, which became outdated when the A46 Expressway ceased to be proposed. The SGP focused development south east of Leicester to help deliver the Expressway and provide access to LUA services and facilities. Without it, the transport studies cited above indicate that cumulative development would worsen severe congestion on the A6 and surrounding routes, preventing the anticipated level of accessibility to the LUA.

- 1.1.16. As a result, the spatial strategy is not considered to be supported by the transport evidence referred to above, rather it is based on the out-dated SGP, which can no longer be delivered sustainably. It is therefore not considered to be an appropriate or effective strategy and therefore cannot be considered sound using the tests at paragraph 35 of the NPPF.

Question 3

- 1.1.17. No. STNT's Regulation 19 representations (and earlier submissions by STNT and other groups to HDC and other Leicestershire Councils) have promoted 2 alternatives to the spatial strategy in the Submission Version Local Plan:

- 1) Development to the south west of Leicester (referred to as the WWRA option in STNT's Regulation 19 Representations); and
- 2) Focusing development on the edge of smaller settlements in settlement hierarchy on sites identified as being sustainable in the SHELAA, similar to Option 2 (Proportional Growth) considered in the SA.

- 1.1.18. Details, and the benefits of the WWRA option over the spatial strategy in the Submission Version Plan is set out in STNT's Regulation 19 Representations, and we do not repeat these here. The WWRA option was presented to the Leicestershire Councils approximately 6 years ago following Midlands Connect withdrawing support for the SGP and the A46 Expressway. As set out in STNT's Regulation 19 Representations, whilst this option would require a revised distribution of LHN across the Leicestershire Authorities to that agreed in the Leicestershire Authorities SOCG relating to Housing Distribution (Examination Library Ref: SCG-NLP18), with the Authorities agreeing to the principle of redistributing housing need between the Authorities, the WWRA does provide a realistic alternative option for a spatial strategy that would have greater benefits than the spatial strategy in the Submission Version Local Plan. There is no evidence that this option has been considered in the formulation of the Plan. There is no reference to this option in the SA, Housing Distribution SOCG (Examination Library Ref: SCG-NLP18), the Housing Distribution Papers (HSG-NLP3 and 11), or the Plan itself.

- 1.1.19. Although the SA considered a strategy similar to STNT's second alternative (Option 2, Proportional Growth) STNT's Matter 1 Hearing Statement explains why its assessment and scoring were neither robust nor consistent with those of other options. The SA gave excessive weight to strategic sites' potential to deliver infrastructure but little or none to the ability of smaller allocations across other settlements to do so. It also emphasised proximity to the LUA rather than practical accessibility from south east Leicester, while giving limited consideration to rail access from sites near Market Harborough. Option 2 was therefore considered but not robustly assessed.
- 1.1.20. As the Local Plan has not considered reasonable alternative strategies, it cannot be considered justified and therefore sound using the tests at paragraph 35 of the NPPF.

Issue 2: Delivering Homes

Question 1

- 1.1.21. No, the methodology is not considered to be robust.
- 1.1.22. Paragraph 3.11 of the Settlement Hierarchy Assessment is clear that consideration of the relationship with areas close to the LUA is based on a proximity principle. There does not seem to be any consideration in the Assessment of the actual accessibility to the Urban Area, giving consideration to matters that would influence the convenience and attractiveness of traveling into the LUA from those locations. As referred to in response to Issue 1, Question 2, the 2009 HDC Transport Study highlighted that public transport accessibility from areas close to Great Glen and the A6 were constrained by congestion on the road network and the limited capacity of the bus network. It is therefore likely that accessibility into the LUA from some locations, particularly those to the south east of Leicester, whilst located close to the LUA, are not as advantageous in terms of sustainable accesses and therefore the ability of these locations to accommodate significant growth.

- 1.1.23. STNT also considers that the approach taken to assessing Great Glen's position in the settlement hierarchy is flawed, and that there is a mismatch between the amount of development distributed to the settlement in Policy DS01 and Table 2 of the Local Plan and its role in the settlement hierarchy.
- 1.1.24. Unlike, Scraftoft, Thurnby, and Bushby, paragraph 4.5 of the Settlement Hierarchy Assessment states that there is separation between Great Glen and the LUA. There is not therefore the same level of access to the LUA as there is for those other settlements. This is reflected in its scoring in the appendices to the Settlement Hierarchy Assessment. Tables 7 and 8 of the place Great Glen in the large villages tier, and not the "Adjoining Leicester Urban Area" tier.
- 1.1.25. However, the proposed LSGR Strategic Allocation would adjoin Great Glen, effectively acting as a significant extension to the settlement and therefore the development should be considered as part of the distribution of development to Great Glen. This is not the approach taken in either the Settlement Hierarchy Assessment or the Local Plan, with the Strategic Site being treated separately and being placed in the Adjoining Leicester Urban Area tier, in its own right. This is not considered to be a robust approach to a significant development that would adjoin and extend Great Glen. The Strategic Site should be considered part of the distribution of development to Great Glen, particularly as the Settlement Hierarchy Assessment identifies that Great Glen does not adjoin the Urban Area in a similar way to the Scraftoft, Thurnby, and Bushby.
- 1.1.26. If the Strategic Site is considered as part of the development distributed to Great Glen, the total amount of development to be distributed to the settlement in Policy DS01 is 1,810 dwellings (1,200 dwellings from the strategic site and 610 on other sites). This is a higher amount of development than is distributed to the 3 settlements that are identified in the Adjoining Leicester Urban Area tier in the Settlement Hierarchy Assessment (Scraftoft, Thurnby, and Bushby – 1,718 dwellings). This clearly is not based on the Settlement Hierarchy Assessment that Great Glen is a Large Village.

- 1.1.27. It is therefore considered that the housing distribution in Policy DS01 is not justified because it is contrary to the Settlement Hierarchy Assessment by directing significantly greater development to Great Glen than its role as a Large Village.

Question 2

- 1.1.28. No. As referred to in STNT's Regulation 19 Representations, the SHELAA contains positive assessments of numerous small and medium sized sites across many sustainable settlements. Those sites have been discounted, and therefore the level of distribution of development to certain settlements reduced, in favour of the large strategic sites, including the LSGR on the basis that the strategic sites could deliver large infrastructure. As referred to in STNT's Regulation 19 Representations, there is evidence to show that the strategic allocations cannot deliver this infrastructure, and therefore the basis for discounting the SHELAA sites and the spatial distribution of development is not justified.

Question 4

- 1.1.29. No. As referred to above, the spatial strategic is predicated on the out-dated SGP, with a view to delivering development in locations that are accessible to the LUA. Given that the necessary road infrastructure to support the SGP spatial strategy is no longer proposed, that level of accessibility is no longer achievable and the spatial strategy should instead focus more development on the market towns, particularly Market Harborough, where there is good train accessibility to Leicester.

Issue 4: Leicester City's Unmet Need

Question 2

- 1.1.30. No. Leicester's Local Plan covers a plan-period of 2020-2036, which following adoption in 2026 would be shorter than the 15-year requirement in the NPPF. The Inspectors' Report for the Leicester Local Plan therefore requires a review of the Local Plan within 3 years of it being adopted. As part of that review, Leicester needs to review its LHN. Such a review would remove the 35% urban uplift that is currently part of Leicester's LHN, as that no longer forms part of the Standard Method.

Leicester's LHN in 3 years' time could therefore be significantly different to that at present, and there may no longer be a need to meet a proportion of its LHN in neighbouring authorities.

- 1.1.31. The Harborough Local Plan should not therefore commit to meeting a proportion of Leicester's Housing need beyond 2030, let alone 2036.