

Examination of the Harborough Local Plan 2020-2041

Stage 2 Matters, Issues and Questions (MIQs)

Written Statement by Harborough District Council

MATTER 3: Amount and Distribution of Development

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

Policies DS01, DS02, DS03, DS04, DS05, SA01 and AP01 to AP05

Matter 3, Issue 1: Spatial Strategy

The Council's response:

Matter 3, Issue 1, Question 1

Q1: Does the Plan clearly articulate its spatial strategy?

1. Yes.
2. **Housing:** Policy DS01 clearly sets out the amount and location of new housing growth across the District by settlement hierarchy tier and individual settlement. Policy SA01, SA02, SA03 and SA04 allocate sites to meet these requirements.
3. The explanatory text to Policy DS01 (from paragraph 4.9) sets out the settlement hierarchy and Table 2 sets out the overall distribution of housing supply by tier and settlement, taking into account housing completions, commitments and windfall allowance.
4. Most additional housing development is allocated at the top of the settlement hierarchy at the Leicester Urban Area, followed by Market Towns and then Large Villages.
5. **General Employment:** Policy DS02 clearly sets out the amount and location of employment and retail development.

6. Policy DS02(2) sets out the requirement for additional general employment land in the District and the distribution by settlement hierarchy tier and individual settlement. Policy SA01 allocates sufficient sites to meet these requirements. Additional employment land is allocated towards the top of the settlement hierarchy at the Leicester Urban Area, Market Towns and Large Villages.
7. **Strategic Distribution:** Policy DS02(7) sets out the requirement for additional development of 340,000 sqm floorspace for Strategic Distribution and the location at Magna Park. Policy SA01 allocates sites to meet this requirement.
8. **Retail:** Policy DS02(10) sets out the overall requirement and identifies sites in Market Harborough. Policy DS02(11) directs retail and leisure towards locations based on the retail hierarchy.

Matter 3, Issue 1, Question 2

Q2: Is the spatial strategy as set out in Strategic policies DS01 to DS05, and elsewhere in the Plan, an appropriate strategy, taking account of reasonable alternatives, and based on proportionate evidence?

9. Yes, the spatial strategy is appropriate. The Development Strategy Paper (2025) [[PRE-NLP4](#)] sets out the process and justification for the overall development strategy, including the reasonable alternative options considered.
10. Prior to the Issues and Options consultation (Jan/Feb 2024), six reasonable alternative options for the distribution of housing growth required to 2041 were identified and subject to Sustainability Appraisal (SA) by independent consultants (LUC). These options were:
 - Option 1: Local Plan Strategy
 - Option 2: Proportional Growth
 - Option 3: Urban Area Focus
 - Option 4: Strategic Sites Focus
 - Option 5: Market Town Focus
 - Option 6: Large Village Focus

11. Each of the six options were combined with three alternative levels of growth (high, medium and low) resulting in 18 discrete options for consultation/appraisal.
12. These options were subject to SA, with the findings being provided to the Council so that they could be taken into account at the earliest opportunity, before being presented publicly in the SA Report alongside the Issues and Options Consultation in Jan/Feb 2024 [[PRE-NLP2](#)].
13. After the Issues and Options Consultation the initial alternatives were assessed against a range of factors, including the SA, Consultation Responses, Deliverability, emerging Local Plan Objectives and the NPPF.
14. The appraisal was used to develop three refined options for the distribution of housing. The assessment (including the SA) highlighted the sustainability benefits of Large Strategic Sites (Option 4), but also potential issues in relation to deliverability. Therefore, the Council included no more than two large strategic sites in any refined option. The large strategic sites, which were taken forward for further testing through the refined options, were those that had been assessed through the Strategic Housing Land Availability Assessment (SHLAA) and the SA and which were considered by the Council to be appropriate, as well as Lutterworth East which was an existing commitment.
15. Option 3: Urban Area Focus and Option 5: Market Towns focus also demonstrated clear sustainable benefits and were broadly comparable in terms of positive and negative effects when assessed through the SA. Given the potential sustainable benefits of development at Large Strategic Sites, followed by development at the Leicester Urban Area and Market Towns, the strategic sites were combined into a new Refined Urban Area Spatial Option and a new Refined Market Towns Spatial Option. A third option was also developed which was a combination (or hybrid) of the Refined Urban Area and Market Towns options:
 - Refined Option 1 (RO1): Market Towns Focus (including new Strategic Site adjoining Lutterworth).
 - Refined Option 2 (RO2): Urban Area Focus (including new Strategic Site adjoining Oadby).
 - Refined Option 3 (RO3): Urban Area and Market Towns Focus (including Strategic Site at Oadby).

16. The three refined housing distribution options were appraised at the medium scale of growth. The Development Strategy Paper [\[PRE-NLP4\]](#) sets out the justification for the medium scale of growth which considers the NPPF, PPG, the HENA 2022 [\[HSG-NLP2\]](#), Housing Distribution Paper (2022) [\[HSG-NLP3\]](#) and the L&L SoCG (2022) [\[SCG-NLP3\]](#).
17. The three refined options were subject to SA by LUC and the findings were again provided to the Council and formed the basis for Chapter 5 of the final SA Report [\[S-NLP3\]](#). The Council took account of the SA findings the opportunity to take into account the SA findings, along with other relevant factors, when deciding which refined growth option to take forward in the Proposed Submission Draft Local Plan.
18. The three Refined Options were considered against the SA, Deliverability, emerging Local Plan Objectives and the NPPF. Refined Option 3 combines elements of refined options 1 and 2 and performed the best overall. The SA indicates this option performs similarly to Refined Option 2 when considered against the majority of SA objectives, largely due to the comparable scale of overall growth towards the top of the settlement hierarchy with similar environmental sensitivities at the proposed development locations. However, Refined Option 3 is considered to perform better against SA Objective 9: Housing by spreading development more evenly across the highest tiers of the settlement hierarchy. The spread of growth also makes this option the most deliverable option by avoiding overconcentration of development at Lutterworth and Scraftoft/Thurnby/Bushby which could cause deliverability challenges in the other options. This option also performs well against the emerging Local Plan objectives and the NPPF focusing development towards the most sustainable locations at a scale that is deliverable and capable of providing a mix of sites.
19. Reflecting these conclusions, Policy DS01 in the Proposed Submission Draft Local Plan took forward Refined Option 3 from the suite of options considered, as it was considered by the Council to be the most sustainable approach to accommodating the required level of development in Harborough. The process as a whole considered 21 discreet reasonable options/alternatives in total. Therefore, the development strategy is considered to be an appropriate strategy, taking into account reasonable alternatives.
20. For general employment, the Development Strategy Paper (2025) [\[PRE-NLP4\]](#) recognises the plan needs to promote a strategy that supports good accessibility to job opportunities for communities.

21. The options process for employment land provision was informed primarily by the conclusions of the HENA 2022 [[HSG-NLP2](#)] and the Harborough Local Housing & Employment Land Evidence (2025) [[EMP-NLP5](#)], taking into account the NPPF, SA, emerging Local Plan Objectives, and consultation responses. In order to identify an appropriate strategy, reasonable alternatives for the distribution of employment development were developed for three scales of growth (Low, Medium and High) as follows:

- Option 1: Intensifying the density of employment uses in existing employment areas in appropriate and sustainable locations. This option focuses on making more efficient use of land and recognises the marginal viability of employment development in Harborough District.
- Option 2: Continue with the current approach of focusing new employment land in the District's main economic centres (Market Harborough, Lutterworth) and larger sustainable settlements). This would concentrate growth in our most sustainable settlements which accommodate or are most accessible to the resident workforce.
- Option 3: Align new employment land provision with areas of significant housing growth. This would achieve a balance of jobs and homes in areas of significant growth, be that settlements or strategic sites.

22. Nine discreet alternative options for the distribution of employment land were therefore considered (i.e. 3 spatial options at 3 scales of growth). The performance of the locational options was considered against the SA, Issues & Options 2024 Consultation Responses, Deliverability, emerging Local Plan Objectives and the NPPF. The preferred option for the scale of employment development is Option B (Medium Growth) and a combination of Spatial Option 2 and 3 above. The Local Housing & Employment Study (2025) indicates there is only a limited need for additional allocations to meet needs, provide flexibility in supply and meet geographical gaps in provision. Protecting and providing new employment land in the main economic and residential centres, will result in a mix of sites that are attractive to market and provide sustainable benefits in terms of the co-location of jobs and homes, both for existing and future populations as new residential development comes forward.

Matter 3, Issue 1, Question 3

Q3: Have all realistic options for the distribution of development within the District been identified and considered robustly in the formulation of the Plan?

23. Yes. As described in response to the previous question above, the Council went through a detailed process to identify and assess the alternative options for the distribution of development in the District. The Council does not consider that there are further realistic alternatives to those detailed above, and no other reasonable alternatives were put forward through the Local Plan consultations.

Matter 3, Issue 2: Delivering Homes

Policy DS01 Development Strategy: Delivering Homes

The Council's response:

Matter 3, Issue 2, Question 1

Q1. The Settlement Hierarchy Assessment January 2025 [PPL-NLP1] scores settlements and groups them according to a number of sustainability factors, which provides the settlement hierarchy in the District. That underpins the hierarchy set out in Policy DS01 and AP01. Is the methodology in determining the Plan's settlement hierarchy robust and the outcomes accurate? Is the distribution of development between the tiers of settlements justified and how has it been established?

24. Yes. The methodology used to establish the settlement hierarchy (as set out in Section 3 of [PPL-NLP1](#)) is robust and involved a two-stage process.

25. Firstly, quantitative factors were considered. This included an analysis of a settlement's size, using both population and household numbers and an audit of services and facilities. Services and facilities were split into three categories for audit purposes: higher order services and facilities (including leisure centre, railway station and secondary school); important services (including primary school, supermarket, GP surgery and hourly bus service to town / city centre); and supporting services (including pharmacy, library, pre-school/nursery school and limited bus service). The presence of a service or facility in a settlement generated a score according to the weighting given to each category: higher order services scored higher than important services, which scored higher than supporting services. The total scores attributable to the

services and facilities in each settlement was calculated and used to inform the establishment of provisional settlement hierarchy tiers.

26. Secondly, a qualitative assessment was undertaken to sense-check the outcome of the provisional settlement tiers identified through the quantitative assessment. This looked in more detail at the settlement's location within the district, expanded on the services and facilities, considered access to public transport, neighbourhood plan activity, past housing completions and commitments, SHELAA 2021 capacity, heritage assets and other potential constraints at play in the settlement.
27. The outcomes of the settlement assessment are set out at Table 8 of PPL-NLP1 and are considered to be accurate. Initial results of the quantitative assessment were verified by reference to Town and Parish councils / meetings and settlement audits amended to reflect responses received. No changes were made to the initial outcomes of the quantitative analysis following the sense check provided through the qualitative assessment, further supporting accuracy of the assessment findings.
28. The distribution of development between the settlement tiers is justified and has been established through a robust process of identification, testing and refinement of spatial options, described in more detail in the Local Plan Development Strategy [[PRE-NLP4](#)]. This process involved firstly identifying six reasonable alternatives for the distribution of housing growth. These six options were informed by: the settlement hierarchy; SHELAA evidence of the maximum potential capacity available within each settlement and each tier in the settlement hierarchy to ensure deliverability; and existing levels of commitments providing the minimum level of growth within each settlement. In addition, the development strategy of the adopted Local Plan was taken forward and used to develop an option, together with an option based on a proportionate distribution of growth throughout the settlement hierarchy based upon the number of households in each settlement.
29. These options were developed to be meaningfully different from each other in order to fully test each alternative distribution approach. These six distribution options were combined with the three levels of growth options to result in 18 discrete options for testing. Each option was tested with reference to the following factors: Sustainability Appraisal; Issues & Options 2024 Consultation Responses; deliverability; conformity with the emerging Local Plan Objectives; and conformity with the NPPF.

30. The results of this assessment provided a ranking of the options according to their relative sustainability. Two of the six options were found not to be appropriate and were therefore not taken forward for further testing. The strengths and weaknesses of the remaining four options were assessed, and each was found to offer elements to take forward into the development of three refined options, which combined the beneficial elements of the four most sustainable options. The refined options were: Market Towns Focus (including new strategic site adjoining Lutterworth); Urban Areas Focus (including new strategic site adjoining Oadby); and Urban Area and Market Towns Focus (including strategic site at Oadby).
31. For each of the three refined options, an indicative amount of growth was apportioned to each level of the settlement hierarchy to enable an appraisal of potential effects at the settlement level as well as for the district as a whole. The housing figures apportioned to each settlement tier were determined by the focus of each distribution strategy and the maximum potential capacity as evidenced by the SHELAA.
32. The three refined options were considered against the following factors: Sustainability appraisal; deliverability; conformity with emerging Local Plan objectives; and conformity with the NPPF. The outcome of the assessment allowed the options to be ranked according to their sustainability, recognising their potential strengths and weaknesses.
33. The Urban Areas and Market Towns option was found to perform the best overall and considered to be an appropriate strategy, that is deliverable, able to meet development needs (including unmet needs) and consistent with the NPPF. This option was therefore taken forward as the preferred option and used to determine the overall number of homes at each settlement and tier of the hierarchy.

Matter 3, Issue 2, Question 2

Q2. Is the proposed distribution of housing supported by the evidence in the Strategic Housing and Economic Land Availability Assessment (SHELAA), [HSG-NLP4 to 6] settlement hierarchy, and SA, and will it lead to an appropriate pattern of housing growth?

34. Yes, Policy DS01 would lead to an appropriate pattern of housing growth which focuses growth to the most sustainable settlements, with each tier in the hierarchy delivering more growth than the less sustainable tier below. The housing distribution strategy is informed and supported by relevant evidence.
35. SHELAA [HSG-NLP4] Figure 5 demonstrates there is sufficient capacity in appropriate locations to meet the proposed distribution of housing.
36. Settlement Hierarchy Assessment [PPL-NLP1] Table 8 uses the analysis undertaken to place settlements in defined hierarchy tiers. These hierarchy tiers informed the housing distribution set out in Policy DS01, which focuses growth to the higher and therefore most sustainable tiers.
37. SA [S-NLP3] appraises the three Refined Options and identifies option 3 (upon which the proposed housing distribution is based) as the most sustainable of the options.

Matter 3, Issue 2, Question 3

Q3. Would the Plan's spatial strategy strike the right balance between the need for development across brownfield and greenfield sites and any related impact on housing affordability?

38. Yes, the Plan's spatial strategy strikes the right balance between brownfield and greenfield development considering the very limited amount of brownfield land within the district.
39. Figure 9 of the SHELAA [HSG-NLP4] together with the [Brownfield Land Register](#) shows very limited amount of brownfield land within the district. Of the 298 sites appraised through the SHELAA, only 24 are assessed as being previously developed land and a further 27 incorporate an element of previously developed land and are considered 'mixed'.

40. As such, the spatial strategy locates development based on the settlement hierarchy and an understanding of the role and function of each settlement in supporting new development. Meeting the Plan's identified development needs through brownfield sites alone as not feasible. There is therefore no direct impact on housing affordability.

Matter 3, Issue 2, Question 4

Q4. How has the Plan's aim to accommodate some of Leicester's unmet housing need been reflected in the Plan's spatial strategy? Does it strike the right balance between promoting development between the Leicester urban area and the District's market towns?

41. The Plan accommodates 123 dwellings per annum between 2020 and 2036 as Harborough's contribution to meeting Leicester's unmet housing need. This is in accordance with the Leicester and Leicestershire 2022 SoCG [[SCG-NLP-3](#)].
42. Harborough's contribution to meeting Leicester's unmet need is not explicitly reflected in the Plan's spatial strategy. Rather the spatial strategy reflects the outcome of the process of identification, testing and refinement of reasonable alternative spatial strategy options in order to identify a preferred option. This process was informed by evidence including the SA, settlement hierarchy and SHELAA.
43. The spatial strategy focuses development to the most sustainable locations in the District, which are: firstly, the Leicester urban area and land adjoining and; secondly, the district's market towns of Market Harborough and Lutterworth. The Plan allocates 2,450 homes in the Leicester urban area and 1,670 in the market towns. This reflects the higher level of sustainability of the Leicester urban area, offering greater levels of access to services and facilities compared with the two market towns. Growth is therefore directed towards the Leicester urban area based on the relative sustainability of this location, rather than explicitly due to the inclusion of 123 dwellings per years of Leicester's unmet need within the housing requirement.

Matter 3, Issue 3: Housing Need and Requirement

The Council's response

Matter 3, Issue 3, Question 1

Q1. The Plan area's housing need is calculated using the standard method set out in PPG [ID: 2a-002-20241212] [ID:2a-004-20201216]¹ That results in a Local Housing Need (LHN) figure for the District of 534 homes per year. The Council in its response to the Panel's PQ 16 confirms that its latest calculation of LHN is in 2022 [HDC2]. The Plan's housing requirement includes an element of LHN plus an allowance for unmet needs in the Leicester City. The Plan's housing requirement is the same as the housing to be delivered by this Plan.

In deriving the Plan's housing requirement from the calculation of LHN, should supply prior to the latest calculation of LHN be taken into account? Given that the PPG explains that the purpose of the affordability adjustment applied in the Standard Method takes account of past delivery would this be a justified approach consistent with national policy? [ID: 2a-011-20241212] [2a-011 20190220]²

44. The Plan's housing requirement covers the plan period from 2020 to 2041, drawing on a consistent approach and evidence across the L&L Housing Market Area (HMA) and aligns to that used in other plans within this area (including the Leicester Local Plan 2020 – 2036 which was adopted in June 2026 following completion of the examination earlier this year).
45. The Leicester Local Plan is based on the LHN calculated in March 2022 (see table 3.1 in [HSG-NLP3](#)) and applied to a plan period from 2020 to 2036. Table 3.2 in [HSG-NLP3](#) shows that housing completions from the 2020 base date (i.e. supply prior to their latest calculation of LHN) is taken into account and directly informs the scale of unmet housing need 2020-36 and the associated HMA-wide evidence. These figures are consistent with the recently adopted Leicester Local Plan (2020-36).
46. The HENA considered housing needs across the housing market area, which then informed the apportionment of need between different authorities to take account of unmet need from Leicester 2020-36. The HENA Housing Distribution Paper [\[HSG-NLP3\]](#) considers the apportionment of needs between different authorities, taking account of supply constraints and unmet needs in Leicester, functional relationships with Leicester and issues relating to jobs/homes alignment and deliverability to derive an apportionment of the 91,400 homes need across the HMA over the 2020-36 period. It concluded in

identifying a need for 10,515 homes (657 dpa) for Harborough over the 2020-36 period. This was based on the HENA LHN calculated in March 2022 for Harborough of 534 dpa together with a 123 dpa contribution to unmet needs of Leicester (see [HSG-NLP3](#) Table 6.9).

47. This informed the 2022 SoCG ([SCG-NLP3](#)) which set out the agreed apportionment of need over the 2020-36 period, including the apportionment of unmet need. The housing requirement in the draft plan is therefore consistent with this evidence.
48. The Housing and Economic Needs section of the PPG (Paragraph: 012 Reference ID: 2a-012-20190220) explains how the standard method LHN should be applied to local plans. It says: ***“How can plan-making authorities apply the method to the overall plan period? The method provides authorities with an annual number, based on a 10-year base line, which can be applied to the whole plan period...”***
49. The housing requirement of 13,182 homes 2020-41 is informed by applying the LHN calculation to the whole plan period and is therefore considered to be justified and compliant with the PPG and NPPF. A ‘Housing requirement’ is defined in the PPG as “the minimum number of homes that a plan seeks to provide during the plan period” [ID: 2a-040-20241212]. As set out in NPPF23 paragraph 67, strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met ‘over the plan period’. In this case, the Plan’s 13,182 housing requirement is an aggregation of those two figures (based on the LHN 2022 calculation) which is consistent with para 67 of the NPPF; the PPG; HMA-wide evidence and agreements; and recently adopted local plans in the area including Leicester.
50. Housing supply from 2020 to 2041 must therefore be taken into account and counted towards meeting the housing requirement in the plan and it is not considered necessary to rebase the plan period and/or adjust the housing requirement which is justified by the evidence above.
51. The Council recognises the PPG sets out in Para 2a-008¹ that the local housing need (LHN) figure should be calculated at the start of the plan-making process; and then kept under review and revised where appropriate.

¹ ID: 2a-008-20190220 See

<https://webarchive.nationalarchives.gov.uk/ukgwa/20241119230327/https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

This is the process the Council has followed. The LHN was initially calculated in the HENA [[HSG-NLP 2](#)] which indicated a need for 534 dpa.² It was the HENA evidence which fed into the Housing Distribution Paper [[HSG-NLP3](#)] and Leicester & Leicestershire Statement of Common Ground in June 2022 [[SCG-NLP3](#)].

52. The District's LHN was kept under review as plan-making progressed as the PPG advises. The Development Strategy paper explains that 3 initial alternatives for the scale of growth were considered (low, medium and high) informed by the LHN calculated in 2022; the L&L Housing Distribution Paper and SoCG (2022). It then explains why the medium scale of growth was taken forward and considers the LHN at the time (see p14 of [PRE-NLP4](#)). Under the heading 'Local Housing Need Assumptions' (p15) it says "*Local Housing Need was calculated using the Government's standard method. The figure of 534 homes per year was calculated based on data published in 2022. The latest data (2024) suggests the housing need for the District is 510 homes per year. This figure is not significantly different and the 2022 figure was used to inform the Housing & Economic Needs Assessment, Housing Distribution Paper 2022, the L&L SoCG and Local Housing and Employment Evidence. Using the figure of 534 as a starting point is therefore considered to be justified by the evidence and consistent with the NPPF.*"
53. The Local Housing & Employment Land Evidence report dated Feb 2025 [[EMP-NLP 5 Report](#)] also recalculated the local housing need, indicating a need for 510 dpa (see Table 13.5, p204).
54. The Plan was submitted on 17th April 2026. A recalculation of the LHN using the methodology for transitional plans at this point would show a LHN of 489 dpa (see [HDC 2](#) Q16). Again, this was lower than the HENA figure.
55. However, both the PPG and NPPF make clear that the standard method calculation of LHN provides an assessment of the minimum number of homes needed and does not preclude the setting of a higher housing requirement. Para 67 in the NPPF23 clearly makes the distinction between the housing need figure and a housing requirement and sets out that the housing requirement may be higher than the identified housing need – including in circumstances where it reflects growth ambitions related to economic development or to where it captures unmet needs of neighbouring areas.

² HENA Table 8.1, p137

56. The Local Housing & Employment Land Evidence report ([EMP-NLP5](#)) considered whether it was appropriate to adjust the LHN in Section 6, noting that the latest standard method figure was lower. It found evidence of higher household growth than in the 2014-based projections, but critically found there was a basis for continuing to use a consistent evidence across the L&L HMA aligned to that in the 2022 Housing Distribution Paper [[HSG-NLP3](#)] and 2022 Housing Statement of Common Ground [[SCG-NLP3](#)].
57. Importantly, the unmet need from Leicester has been based on a 2020 base position consistent with Leicester's now adopted Local Plan 2020-36 (June 2026). An over-delivery in the initial years of the plan period can have contributed to meeting Leicester's unmet needs. The functional relationships between the District and Leicester and contributions to Leicester's unmet needs, including in the early part of the plan period, mean that it is not considered appropriate to rebase the plan starting point.
58. The supply of homes from the 2020 base date should be taken into account and contribute towards meeting the plans housing requirement 2020-41. This approach is consistent with PPG, NPPF, HMA-wide evidence and recently adopted Local Plans in the area as set out above.

Matter 3, Issue 3, Question 2

Q2. The Panel notes the Council's response to the Panel's PQ16 [HDC2]. If the Panel were to decide that the Plan's housing supply prior to the latest calculation of LHN should be discounted from its housing requirement, what is the implication for the Plan housing requirement?

59. The Plan's housing requirement includes not just the District's LHN but contributions to meet unmet needs from Leicester. Housing supply in the early part of the plan period will have contributed to meeting both of these components of the requirement. The Council does not agree that it is necessary to adjust the plan period. It notes other plans which have been recently adopted with an earlier start point including Charnwood and Leicester; as well as Nuneaton & Bedworth.
60. It also notes that ONS migration data indicates net migration of 4,100 persons (rounded) from Leicester to Harborough over the 2020-25 period. In the context of strong housing supply, it is reasonable that any oversupply against

the District's LHN over this period will have contributed to meeting the City's unmet needs.

Net Migration from Leicester to Harborough, 2020-25

	From Leicester to Harborough	From Harborough to Leicester	Net Migration from Leicester
2020-21	1326	380	946
2021-22	1249	377	872
2022-23	1154	398	756
2023-24	1108	387	721
2024-25	1219	372	847
Total	6056	1914	4142

Source: ONS Internal Migration in England & Wales Statistics

61. The Council do not consider it necessary to adjust the plan period for soundness. Furthermore, particular difficulties would arise in rationalising the contribution to Leicester's unmet needs, updated LHN evidence and the housing requirement.

Matter 3, Issue 3, Question 3

Q3. NPPF paragraph 63 sets out, in the context of establishing need, the size, type and tenure of housing needed for different groups in the community that should be assessed and reflected in planning policies. The non-exclusive list of those with specific housing needs includes those who require affordable housing, families with children, older people, students, people with disabilities service families, travellers, people who rent their homes and people wishing to commission or build their own homes. How has the Plan assessed and sought to meet the needs of those with specific housing needs as required by NPPF paragraph 63?

62. The core evidence of needs is set out in the Local Housing & Employment Land Evidence Report 2025 [[EMP-NLP5](#)]. This identifies the need for affordable housing in Section 5; needs for family housing in Section 6; and the needs of older persons and those with disabilities, those who rent their homes, and those wishing to commission/build their own homes in Section 7. The needs of gypsies and travellers are considered in [HSG-NLP9](#).
63. The Housing Mix and Type Topic Paper [[TPC-NLP8](#)] sets out how these needs have informed the Plan.

64. In terms of affordable housing, the needs evidence in [HSG-NLP2](#) defined a need for 421 affordable homes per annum, which as the Topic Paper sets out makes up 67% of the proposed housing requirement. As the Topic Paper identifies at Para 2.3.6, the HENA evidence (see Paras 9.40 – 9.50) considered whether there was a need to adjust the housing requirement upwards, including to support the delivery of affordable housing, as did the 2025 Housing & Employment Land Evidence [\[EMP-NLP5\]](#). Affordable housing delivery is however influenced by viability, and the Plan's policies in HN01 reflect the viability evidence which recommended that the Plan seek 40% affordable housing provision. As the Topic Paper sets out, the Council has been working to prepare a Delivery Plan to support the delivery of affordable housing including to capture grant funding to support additional delivery.
65. The affordable tenure mix sought by Policy HN01 reflects the needs evidence in HSG-NLP2.
66. The evidence in EMP-NLP5 regarding the need for different sizes of homes, including family households, are reflected in Policy HN02 which refers in Part 1) to delivering an appropriate mix of house types, tenures and sizes to take account of the Council's latest evidence with the key findings on housing mix set out in Table 10 in the Plan.
67. In respect of older persons and those with disabilities, Policy HN02 in the Plan draws on the needs evidence in EMP-NLP5 and recommendations in HSG-NLP2 in setting out that all homes will be expected to meet M4(2) standards unless site-specific factors make this impossible; and major residential developments will be expected to provide 5% of market homes and 10% of affordable homes to M4(3) standards. These policy requirements are taken into account in the Viability Assessment [\[INF-NLP3\]](#).
68. As the Topic Paper [\[TPC-NLP 8\]](#) sets out, the Council did invite submissions for sites for specialist housing through the Call for Sites exercise and these were assessed through the SHLEAA process but none were found to be suitable (see Paras 5.3.6-11). This informed the approach in Policy HN04 (Supported and Specialist Housing) which supports provision of specialist housing and anticipates that on sites of 100+ dwellings it will constitute at least 10% of the dwellings proposed. As set out in the Topic Paper, this is expected to support delivery of specialist housing on 13 site allocations.
69. The Topic Paper identified a shortfall in supply of self- and custom-build homes of 154 homes; with further analysis set out in the needs evidence (EMP-NLP5 Section 7). This informed the drafting of Policy HN05 seeking at

least 10% provision on all non-specialist developments of 40+ dwellings (gross).

Matter 3, Issue 3, Question 4

Q4. NPPF paragraph 67 sets out that strategic policies should set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Would the Plan be consistent with this national policy?

70. Yes. In addition to housing completions, commitments and windfalls, Policy DS01 sets out the strategy for the pattern and distribution of additional homes. Table 2 shows this requirement in the context of existing completions, commitments and windfalls.

71. Paragraph 4.18 of the draft local plan therefore says “*The NPPF indicates the Local Plan should set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. The ‘Total 2020-2041’ column in Table 2 above therefore contains the housing requirement for current and future neighbourhood areas between 2020 and 2041. For settlements not identified in Table 2 the housing requirement for Neighbourhood areas is zero.*”

Matter 3, Issue 4: Leicester City’s Unmet Need

The Council’s response

Matter 3, Issue 4, Question 1

Q1. The Plan’s housing requirement includes an allowance for Leicester City’s unmet need until 2036. This is made up of a requirement above LHN of 123 homes per annum 2020-2036 based on evidence in the Housing Distribution Paper (June 2022) [HSG-NLP3]. What is the robust justification for this approach?

72. The draft local plan is being examined against the NPPF23. The Housing Distribution Paper (June 2022) [HSG-NLP3] and associated Leicester & Leicestershire Statement of Common Ground (June 2022) (SCG-NLP3) provide the only robust justification for dealing with unmet housing need in Leicester and Leicestershire (L&L) HMA under the NPPF23. This evidence

requires Harborough to accommodate an additional 123 homes 2020-2036 to meet unmet need from Leicester City.

73. The examination of the Leicester Local Plan (2020-36) ended earlier this year and the plan was adopted by Leicester in June 2026. The adopted plan identifies a scale of unmet need between 2020 and 2036 that is consistent with the Housing Distribution Paper ([HSG-NLP3](#)) and associated SoCG 2022 ([SCG-NLP3](#)) which provide robust justification for addressing NPPF23 unmet need from Leicester across the HMA.

Matter 3, Issue 4, Question 2

Q2. Should the Plan's housing requirement include provision for unmet need beyond 2036? Has Leicester City's unmet need beyond 2036 been quantified through the local plan process? In the absence of robust evidence justifying Leicester City's capacity, is there robust evidence to support such an approach?

74. It would not be justified for the Harborough Local Plan to include provision for unmet housing need beyond 2036. Leicester City is the only authority in the HMA to identify an unmet housing need against the NPPF23 standard method for calculating local housing need (LHN) and has only very recently adopted the new Leicester Local Plan (June 2026) covering the period 2020 to 2036. This local plan process robustly quantified an unmet housing need of 18,700 homes over the 2020-36 period which has been tested through examination that closed earlier this year. The amount of unmet need identified in the Leicester Local Plan is consistent with the L&L Housing Distribution Paper (2022) and associated SoCG (2022) ([HSG-NLP3](#), [SCG-NLP3](#)), and it is agreed the Harborough Local Plan should be consistent with this evidence.
75. Leicester is one of the 20 largest cities in England and the most sustainable location in the HMA, with a comprehensive sustainable transport network, a rail station, universities and colleges, a diversity of employment opportunities, major hospitals, along with opportunities for high density development and greater potential for brownfield regeneration than the rest of the HMA. It is therefore critical for the sustainable planning of the HMA that a robust assessment based on NPPF compliant evidence is undertaken through the local plan process before homes to provide for need arising from the most sustainable location in the HMA are accommodated in a rural District like Harborough. To do otherwise would conflict with the NPPF.

76. Leicester has not yet started its new local plan process or prepared any new NPPF compliant evidence required to robustly quantify unmet need beyond the 2036 end date of its current plan. It would therefore not be justified or NPPF23 compliant for the Draft Harborough Local Plan to make provision for further unmet housing need after 2036. Any unmet need beyond that identified in Leicester's recently adopted plan would need to be robustly evidenced through a new local plan process (for a new plan period) against the new standard method for calculating LHN (2024). The evidence of capacity would also need to comply with the requirements of the new NPPF26.
77. It should be noted that under the new standard method (2024) Leicester's LHN and therefore its unmet housing need is substantially lower than the agreed NPPF23 position. The Draft Harborough Local Plan therefore makes provision for significantly more unmet need from Leicester than would be required under the new NPPF. The Updated Housing Distribution Paper (2025) [[HSG-NLP11](#)] and associated SoCG (2025) [[SCG-NLP18](#)] was prepared to support authorities submitting plans under the NPPF24. Whilst this doesn't apply to the draft plan which is examined against NPPF23, it suggests Harborough would need to accommodate 906 homes of Leicester's unmet need 2024-41 under the NPPF24 (see table 9.4 of [HSG-NLP11](#)), compared to the 1,968 homes (123 dpa 2020-36) under NPPF23.
78. This is because, Leicester's unmet housing need is 2,455 homes (205 dpa) 2024-36 under NPPF24 (see table 4.1 of [HSG-NLP11](#)) compared to 18,700 (1,169 dpa) under NPPF23. In the absence of up-to-date Local Plan evidence post 2036, the Updated Housing Distribution Paper (2025) ([HSG-NLP11](#) from para 4.8) identifies an 'indicative' unmet need of 823 dpa for Leicester post 2036.
79. Taking this into account, the report apportions to Harborough 28 dpa 2024-36 and 114 dpa 2036-46 (i.e. a total of 906 homes 2024-41) to meet Leicester's NPPF24 indicative unmet need (see table 9.4 of [HSG-NLP11](#)). This is substantially lower than the 1,968 NPPF23 unmet need contribution in the submitted Draft Harborough Local Plan up to 2036.
80. The plan would need to be reviewed well before 2036 in any event and the new planning system makes provision for Strategic Development Strategies to deal with strategic matters such as this. Local Government Reorganisation is also being considered and whilst the decision is currently being 'reviewed', the government has indicated that two unitary councils are proposed covering Leicester, Leicestershire and Rutland:

- A unitary council covering Leicester, Oadby and Wigston and parts of Blaby, Charnwood, and Harborough
- A unitary council for the remaining area of Leicestershire and Rutland

Matter 3, Issue 5: Housing Supply

The Council's response

Matter 3, Issue 5, Question 1

Q1. PPG confirms that a Plan's housing requirement may be set as a stepped requirement in plan-making where this is appropriate to reflect circumstances within the area. In doing so, planning authorities will need to set out the stepped requirement in the strategic housing policy and provide evidence to support this approach. [ID: 68-012-20190722]

It also confirms that a stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and/or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. [ID: 68-021 20190722]

The Plan includes a stepped housing requirement. What is the robust justification specific to this Plan's circumstances to justify the approach taken?

81. The stepped housing requirement in the plan is justified on the basis of providing for Leicester's unmet housing need under the NPPF23. This unmet need has only been robustly quantified for the 2020 – 2036 period in accordance with the recently adopted Leicester City Local Plan 2020 – 2036 (adopted June 2026) and associated evidence; and the Housing Distribution Paper (2022) ([HSG-NLP3](#)) and associated SoCG (2022) ([SCG-NLP3](#)).
82. Leicester City's unmet need beyond 2036 is yet to be quantified through a new Local Plan process and the scale of unmet need will be different both pre and post 2036 under the New NPPF standard method for calculating LHN compared to the NPPF23. In the absence of robust evidence justifying Leicester City's unmet need post 2036, the stepped housing requirement which makes provision for unmet need to 2036 and is justified by robust evidence and specific circumstances of the area, including as set out in the

Council's response to Matter 3, Issue 3, Question 1 and Matter 3, Issue 4, Question 1 and 2.

Matter 3, Issue 5, Question 2

Q2. Will the Plan provide a supply of deliverable and/or developable sites and/or broad locations to meet the full housing requirement for the whole of the Plan period?

83. Yes. The Housing Trajectory (2025) ([HDC2 Appendix 1 AM29.1](#)) identified the supply of housing from commitments (i.e. deliverable and/or developable sites permitted before 1 April 2025) is anticipated to be 4,238 dwellings during the plan period (1st April 2020 to 31st March 2041). The trajectory also identified an additional supply of specific deliverable/developable sites via the allocations proposed. The supply from the allocations proposed was anticipated to be 6,072 dwellings during the plan period. The trajectory in HDC2 Appendix 1 (AM29.1) also identifies that 4,214 dwellings were completed during the first 5 years of the plan period (1 April 2020 to 31 March 2025). Therefore, deliverable and/or developable sites (completed, committed, and proposed for allocation) total 14,524 dwellings.
84. A windfall allowance (450 dwellings) and the small villages requirement (350 dwellings) brings the total supply to 15,324 dwellings (based on 1st April 2025 data) that are anticipated to be delivered over the whole plan period. This level of supply is higher than the 13,182 home requirement.
85. The Council's response to Matter 7, Issue 2, Question 3, indicates that most of the proposed housing allocations have either been approved; approved subject to S106; or are subject to live planning applications. The planning applications for each site identify a potential capacity the same or slightly higher than proposed in the Policy DS01 and SA01 of the Draft Local Plan. In total, planning applications indicate potential for an additional 251 additional homes on the allocated sites across the District. This gives further potential supply-side flexibility in addition to the 15,324 homes identified (i.e. a potential 15,575 homes).
86. In addition to this, further sites have been approved through the development management process since 1st April 2025. The Council will be publishing its updated 5 year housing land supply position at 1st April 2026 in due course,

which will likely provide further flexibility to the supply of homes across the plan period.

87. The Plan therefore provides a supply of deliverable and/or developable sites to meet the full 13,182 housing requirement for the whole of the plan period 2020-41.

Matter 3, Issue 5, Question 3

Q3. It is intended that the Plan's housing requirement will be met through new local plan allocations, a small villages requirement, a windfall allowance, commitments (extant planning permissions and neighbourhood plan allocations), and completions since the beginning of the new plan period (1 April 2020). Should the supply prior to the latest calculation of LHN be taken into account?

88. Yes. See the Council's response to Matter 3, Issue 3, Question 1 and 2.

Matter 3, Issue 5, Question 4

Q4. Would the Plan promote the development of a good mix of sites, including small and medium sized sites in accordance with NPPF paragraph 70? Would the Plan provide land to accommodate at least 10% of the housing requirement on sites no larger than one hectare?

89. Yes, the plan promotes a good mix of sites, including small and medium sized sites in accordance with NPPF23 paragraph 70.
90. The plan identifies land to accommodate at least 10% of the Housing Requirement (13,182 homes) on sites no larger than one hectare. Taking into account completions, commitments and allocations in the Housing Trajectory 1st April 2025 ([HDC2 Appendix 1, AM29.1](#)), approximately 836 homes are identified on sites less than one hectare. The Housing Trajectory (1st April 2025) also identifies 450 homes will come forward on small windfall sites. The plan also identifies a requirement from Small Villages of 350 homes supported by sites identified in the SHELAA ([HSG-NLP4](#)) sites. The Local Plan therefore identifies land to accommodate 1,636 homes on sites less than

one hectare, which equates to 12.4% of the 13,182 home requirement in Policy DS01.

91. Policy AP01(2) supports development within existing built-up areas of settlements for residential, business and community uses provided it is appropriate in scale and reflects form and character. Policy AP01(3) also supports development on land adjoining settlements where it would meet local housing need identified in a neighbourhood plan or small village targets in Policy DS01. In this respect, the plan supports small sites to come forward, including as community-led development for housing, self-build and custom build housing, and windfall sites in appropriate locations in accordance with NPPF23 paragraph 70.

Matter 3, Issue 5, Question 5

Q5. NPPF paragraph 72 expects that where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply, taking account of strategic land availability, historic windfall delivery rates and expected future trends. The Plan's expected housing supply includes a windfall allowance of 450 homes from 2031 to 2041. Would this accord with national policy?

92. Yes. Historical housing delivery from windfall sites across Harborough has been relatively high based on the definition of windfall sites in the NPPF ('Sites not specifically identified in the development plan'), with the majority of windfall delivered by minor developments.
93. The Plan proposes a windfall allowance (based on past trends) of 450 homes between 2031/32 and 2040/41 (45 dwellings per annum over 10 years). These are homes anticipated to be delivered outside of the residential site allocations and small villages (i.e. on unallocated land outside Tier 5 of the settlement hierarchy).
94. Appendix A to this paper demonstrates that over 10 consecutive years (2015/16 to 2024/25) minor applications outside of small villages yielded 453 completed dwellings (net) across Tiers 1,2,3,4, and 6 of the settlement hierarchy (an average of 45 dwellings per annum). These 453 dwellings were completed on sites not specifically identified in the Harborough Local Plan 2011-2031. The allowance made for windfall as part of anticipated supply (i.e. 450 dwellings over a ten-year period) is therefore based on evidence that it will provide a realistic and reliable source of supply. The allowance made is

thereby considered consistent with national policy as outlined by paragraph 72.

95. Completions on unallocated sites in Tier 5 (Small Villages) were disregarded to avoid double counting completions that have informed/will count towards meeting the Small Villages requirement.
96. The windfall allowance has been applied from 2031 onwards taking into account small site supply already permitted on minor sites outside Tier 5 that are forecast to complete before then.
97. Figures 3, 5 and 6 in the Strategic Housing and Economic Land Availability Assessment Update 2024 [[HSG-NLP 4](#)] indicate that 145 potential housing sites (with a total capacity for 26,816 dwellings) were identified and assessed in settlements not classified as small villages. Of these 26,816 dwellings, 16,964 were considered developable before the end of the plan period.
98. This demonstrates that based on long-term and short-term historical rates of windfall delivery (and taking into account the SHELAA) there is clear evidence to justify the windfall allowance of 450 homes between 2031/32 and 2040/41 (45 dwellings per annum over 10 years) on land outside of the residential site allocations and small villages (i.e. on unallocated land outside Tier 5 of the settlement hierarchy).

Matter 3, Issue 5, Question 6

Q6. The Plan's housing supply includes a small villages requirement. That is made up of completions 2020-2023, commitments (at 1 April 2023), and new growth through this Plan of 350 homes. Plan paragraph 4.16 outlines that small villages have housing targets. What is the robust evidence to justify these housing targets?

99. Paragraph 4.16 of the Draft Plan explains the housing targets for Small Villages have been identified to ensure an appropriate scale of development based on the level of existing residential planning permissions, a broad assessment of the development capacity (as evidenced through the Strategic Housing and Economic Land Availability Assessment Update 2024 [[HSG-NLP4](#)]), the size of the village and the level of service provision.

100. In addition to existing housing completions and commitments, the Development Strategy in Policy DS01 identifies a requirement for 350 homes in Small Villages. Table 2 in the draft plan is based on housing data from 1st April 2023. It shows that taking into account completions, commitments and the Small Village requirements, leads to a total provision for 1,065 homes in Small Villages over plan period (2020-41).

101. In order to justify the small village targets, the following methodology/steps were followed:

Step 1: Establishing an appropriate range of growth for each settlement, based on settlement size and level of services and facilities. The total small village provision (1,065 homes 2020-41) was apportioned by settlement using two different approaches:

- Settlement Size: The number of households in each village from 2021 census data: and,
- Level of Services and Facilities: The facilities audit score for each village in the Settlement Hierarchy Assessment ([PPL-NLP1](#)).

Settlement	Settlement Size			Services & Facilities Audit Score		
	Households	Percentage	Apportionment (Homes)	Services & Facilities Audit Score	Weighting	Apportionment (Homes)
Arnesby	144	3.1%	33	40	4.4%	47
Bitteswell	196	4.3%	46	60	6.6%	70
Church Langton	164	3.6%	38	45	4.9%	53
Dunton Bassett	329	7.2%	76	55	6.0%	64
Foxton	205	4.5%	48	55	6.0%	64
Gilmorton	515	11.2%	120	65	7.1%	76
Great Easton	304	6.6%	71	55	6.0%	64
Hallaton	243	5.3%	56	45	4.9%	53
Leire	249	5.4%	58	45	4.9%	53
Lubenham	380	8.3%	88	50	5.5%	59
Medbourne	208	4.5%	48	55	6.0%	64
North Kilworth	303	6.6%	70	55	6.0%	64
South Kilworth	218	4.8%	51	50	5.5%	59
Swinford	247	5.4%	57	40	4.4%	47
Claybrooke Magna	267	5.8%	62	50	5.5%	59
Tilton	250	5.5%	58	45	4.9%	53
Tugby	151	3.3%	35	50	5.5%	59
Walcote	208	4.5%	48	50	5.5%	59
Total	4,581	100%	1,065	910	100.0%	1,065

102. This led to a range of growth for each small village reflecting its relative size and level of service provision compared to other small villages (see 'Range 2020-41' table in Step 2 below).

103. Step 2: Adjustments for Existing Housing Completions/

Commitments. Having established this broad range in Step 1 existing housing completions and commitments were deducted leaving a 'residual' to be allocated (see 'Residual' table below). Five small villages had existing completions and commitments higher than the indicative targets based on settlement size and facilities (see minus figures in the 'Residual' table below). The indicative target figures were therefore adjusted for these villages to reflect the level of existing completions and commitments. Proportionate adjustments were made to the remaining Small Villages to ensure the scale of development across the Small Villages as a whole aligned with the overall development strategy for the District. This led to a revised indicative range adjusted to take into account the high level of existing housing completions and commitments in a handful of settlements (see 'Adjusted Residual' table below).

Settlement	Range 2020-41		Residual		Adjusted Residual			SHELAA
	Size	Facilities	Size	Facilities	Size	Facilities	Mid point	SHELAA (2024) Capacity
Arnesby	33	47	20	34	17	26	22	
Bitteswell	46	70	25	49	19	38	29	229
Church Langton	38	53	-3	12	0	3	2	115
Dunton Bassett	76	64	64	52	56	42	49	110
Foxton	48	64	22	38	16	28	22	9
Gilmorton	120	76	-66	-110	0	0	0	257
Great Easton	71	64	44	37	36	27	31	25
Hallaton	56	53	24	21	18	12	15	152
Leire	58	53	44	39	37	30	34	81
Lubenham	88	59	52	23	42	13	28	609
Medbourne	48	64	-7	9	0	0	0	32
North Kilworth	70	64	-15	-21	0	0	0	288
South Kilworth	51	59	18	26	12	16	14	10
Swinford	57	47	3	-7	0	0	0	171
Claybrooke Magna	62	59	41	38	34	28	31	60
Tilton	58	53	37	32	30	23	27	77
Tugby	35	59	9	33	5	23	14	119
Walcote	48	59	36	47	31	37	34	69
Total	1,065	1,065	350	350	350	350	350	2,413

104. To ensure the approach reflects both the size and level of services and facilities the mid-point between the two approaches was considered the most appropriate figure on which to base the small village target (see 'Adjusted Residual' table above). This approach ensures development is focused in sustainable locations whilst ensuring the scale of growth is proportionate to settlement size, helping to maintain the vitality of rural communities.

105. **Step 3: Deliverability Check.** The midpoint for each settlement was checked against the SHELAA (2024) ([HSG-NLP4](#)). The SHELAA indicates a potential capacity 2,413 homes across the small villages, which is significantly higher than the 350 home Small Village requirement in Policy DS01. The overwhelming majority of settlements have a potentially capacity substantially higher than the midpoint as shown in the 'SHELAA' table in step 3 above. It is also important to note the SHELAA only includes sites of 5 or more homes. Many of the homes delivered in small villages inevitably come from small sites. Table 2 in HDC2 Appendix 1 ([MM7.2](#)) shows that 455 homes were built in small villages between 2020 and 2025 at an annual average of 91 homes per year. The overall provision of 1,065 homes (2020-41) in Small Villages equates to an average of 51 homes per year across the plan period. Taking into account, potential capacity in the SHELAA (2024) (2,413 homes) and historic completions between 2020 and 2025 of 91dpa in the Small Villages, the overall small village target of 350 homes and the requirement for each settlement is considered to be deliverable.

Step 4: Qualitative Adjustments. Three of the small villages are new additions to Tier 5 of the Settlement Hierarchy (Arnesby, Leire and Walcote). These villages were not identified in the 2019 Local Plan and therefore have a relatively low level of existing housing completions and commitments compared some of the other Small Villages. These settlements would therefore have the some of the highest residual midpoint requirements. Conversely there are a number of small villages with a midpoint residual requirement of zero. The midpoint requirement has therefore been reduced for Arnesby, Leire and Walcote. These homes were then apportioned to settlements with a midpoint of zero in the 'Adjusted Residual' table above to help maintain the vitality of these rural communities over the plan period. The table below shows the final distribution which is reflected in the Small Village requirements in Policy DS01 of the draft local plan and is considered to be justified by the steps set out above:

Arnesby	11
Bitteswell	29
Church Langton	2
Dunton Bassett	49
Foxton	22
Gilmorton	7
Great Easton	31
Hallaton	15
Leire	23
Lubenham	28
Medbourne	7
North Kilworth	8
South Kilworth	14
Swinford	8
Claybrooke Magna	31
Tilton	27
Tugby	14
Walcote	24

Matter 3, Issue 5, Question 7

Q7. The Plan references prescriptive housing figures for individual villages, such as 23 units in Leire, and 49 units at Dunton Bassett. Are these figures envisaged to be treated as a cap on development? Is such an approach consistent with the objective of NPPF paragraph 60, to significantly boost the supply of homes?

106. These figures are not intended to be a cap. Policy DS01(2)e says, “At least 350 homes in Small Villages...”. This is considered to be consistent with NPPF paragraph 60.

Matter 3, Issue 5, Question 8

Q8. How have allocations in Made Neighbourhood Plans been taken into account in deriving the Plan’s housing requirement?

107. The NPPF requires strategic policy making authorities to establish a housing requirement figure for the whole area. The housing requirement for the District of 13,182 homes in Policy DS01 is derived from the standard method for calculating Local Housing Need (LHN) and a contribution towards Leicester’s unmet LHN in accordance with the NPPF.

108. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development (NPPF para 67). In deriving the overall strategy in Policy DS01, completions and commitments

(including sites allocated in made neighbourhood plans) have been taken into account. Deliverable/developable neighbourhood plan allocations form part of the supply in Table 2 of the draft plan and the housing trajectory. Policy DS01 is the strategic policy that sets out requirements for settlements (and associated neighbourhood areas) in accordance with the NPPF, these requirements are in addition to completions and commitments which include made neighbourhood plan allocations.

Matter 3, Issue 5, Question 9

Q9. Would the Plan deliver an appropriate balance between size of site, given the longer lead in times associated with larger sites? Would the Plan's reliance on large strategic sites, including East of Lutterworth Strategic Development Area (SDA), put delivery at undue risk? And if so, how would this be mitigated?

109. The plan delivers a mix of sites of different sizes with different lead-in times as set out in the Housing Trajectory (2025) ([HDC2 Appendix 1, AM29.1](#)). [HDC2 Appendix 2](#) demonstrates the Council can demonstrate a 5 year supply from the date of adoption and the Housing Trajectory (2025) demonstrates this will be maintained for the rest of the plan period thereafter. The plan's housing requirement is frontloaded (657 dpa 2020 to 2036 and 524 dpa 2036-41). It would not be possible to maintain a 5 year supply from the date of adoption if there was an over reliance on large strategic sites with long lead-in times.

110. The Housing Trajectory (2025) identifies a total supply of 15,324 homes. Large Strategic Sites (>1,500 homes) at Lutterworth East and Land South of Gartree Road are expected to contribute 2,700 homes during the plan period (1,500 from 2031 at Lutterworth East and 1,200 from 2033 at Land South of Gartree Road). This amounts to 17.6% of the total 15,324 home supply 2020-41. Below this scale of site, the plan seeks to allocate 3 large sites:

- 950 Homes - S1 at Scraftoft
- 850 Homes - MH2 at Market Harborough
- 600 Homes - MH3 at Market Harborough

These sites are expected to deliver 2,050 homes to 2041 (i.e. 13.4% of the total 15,324 supply).

111. The rest of the supply (some 10,574 homes - 69% of the total supply) is provided on sites containing less than 500 homes, apart from 2 sites which have been under construction and producing housing completions for a

number of years. These 2 sites remain active and will be completed well before the end of the plan period.

112. The supply in the plan is therefore considered to strike an appropriate balance between the mix of site sizes. It also ensures a 5 year housing supply is maintained against the frontloaded stepped housing requirement in accordance with NPPF and is not over reliant on large strategic sites.
113. However, should the forecast housing delivery rates not come forward as expected, there is a significant supply contingency. Policy DS01 identifies a housing requirement of 13,182 homes (2020-41) and the Housing Trajectory (2025) ([HDC2 Appendix 1, AM29.1](#)) identifies a total supply of 15,324 homes, giving a supply contingency of 2,142 (i.e. 16.2%). Further flexibility could be provided through the allocated sites where planning applications have been submitted/approved with slightly higher capacities than allocated in the draft plan. The Council's response to Matter 7, Issue 2, Question 1, indicates potential for up to 251 additional homes from planning applications on allocated sites across the District. Additional speculative development has also been approved since 1st April 2025 base date of the Housing Trajectory boosting supply further. The delivery and timing of the two large Strategic sites are forecast to start delivering in 2031 (Lutterworth East) and 2033 (Land South of Gartree Road) respectively. The timing of delivery is therefore considered to be robust. However, should delivery on these sites (or other sites) not come forward as expected, the evidence shows there is a significant supply contingency to ensure the housing requirement is met over the plan period.
114. The evidence above demonstrates the plan strikes the right balance in terms of site sizes. It is able to maintain a 5 year supply of housing from the date of adoption against a frontloaded stepped housing requirement which would not be possible if the plan was over reliant on large strategic sites. The assumptions on the timing and delivery rates on these sites is considered reasonable. However, in the event that sites do not come forward as envisaged, there is a significant supply buffer of 2,142 (based on 1st April 2025 data) to mitigate the risk of under delivery.

Matter 3, Issue 6: Five-Year Housing Supply

The Council's Response

Matter 3, Issue 6, Question 1

Q1. NPPF paragraph 69 requires that the Plan identifies a supply of specific, deliverable sites for five years following the intended date of adoption. The Council provides an assessment of its five year housing land supply from adoption in appendix 2 to its response to the Panel's PQs [HDC2]. That assessment includes an allowance for small villages (117 homes). In so doing would this accord with national policy? Would this be a justified approach?

115. While Policy DS01 part 2 (e) does not explicitly identify the specific deliverable sites that will meet the small villages requirement between 1 April 2028 - 31 March 2033, it is anticipated that at least an additional 117 dwellings will be completed across small villages between 1 April 2028 and 31st March 2033. This is because there are sites available in small villages that offer a suitable location for development now (as evidenced through the Strategic Housing and Economic Land Availability Assessment Update 2024; [HSG-NLP 4](#)).

116. However, the Plan's approach is not to allocate these sites, but to instead set a minimum housing requirement for each small village while allowing development on land within small villages (where it meets the requirements set out in Policy AP01 2. a to c) and on land adjoining small villages where it provides housing necessary to contribute to meeting the small village targets outlined in Policy DS01 part 2 (e). In effect the Plan allocates 350 homes to Tier 5 (Small Villages). Alongside the policies in the plan there are significant number of neighbourhood plan groups in the District.

117. Figures 3, 5 and 6 in the Strategic Housing and Economic Land Availability Assessment Update 2024 ([HSG-NLP 4](#)) show that 58 potential housing sites (with a total capacity for 2,413 dwellings) were identified and assessed in small villages, with 250 dwellings anticipated as being deliverable within 5 years and an additional 1,306 dwellings within 6-10 years. The SHELAA update is dated February 2024; hence it is reasonable to assume that the 'within 5 years' period identified in the SHELAA starts on 1st April 2024 and ends 31st March 2029, and the '6-10 years' period starts 1 April 2029 and ends 31st March 2034. On a pro rata basis the SHELAA thereby indicates that small villages have capacity for 50 dwellings between 1st April 2028 and 31st March 2029, and 1,045 dwellings between 1st April 2030 and 31st March 2033

(a total capacity of 1,095 dwellings within the five years following the intended date of adoption (1st April 2028 to 31st March 2033)).

118. The Housing Trajectory 2025 ([HDC2 Appendix 1 AM29.1](#)) assumes small villages will deliver 163 dwellings by 31st March 2033 (117 dwellings from 1st April 2028 to 31st March 2033). Local Plan Table 2 ([HDC2 Appendix 1 MM7.2](#)) shows there were 287 dwellings consented across the small villages as of 1 April 2025. The 287 dwellings committed are anticipated to complete before 31st March 2033 and are in addition to the 163 dwellings anticipated to complete and contribute to meeting the small villages requirement by 31st March 2033. Therefore, in total, the Plan assumes that at least 450 dwellings will be completed across small villages between 1st April 2025 and 31st March 2033. This is approximately 41% of the capacity identified in small villages by the SHELAA (capacity for 1,095 dwellings up to 31st March 2033).
119. Given this capacity there is a realistic prospect that at least 163 additional dwellings will be completed in small villages by 31st March 2033 (in addition to the 287 dwellings committed on 1st April 2025). The SHELAA is clear in its evidence of there being sufficient available and suitable sites in small villages to deliver 117 additional dwellings during the five years to 31st March 2033 (i.e. over and above the 287 dwellings already committed on 1st April 2025).
120. Moreover, Local Plan Table 2 ([HDC2 Appendix 1 MM7.2](#)) shows that 455 dwellings (91 per year) were completed in small villages during the first five years of the plan period (1st April 2020 to 31st March 2025), which justifies the assumption that at least 450 dwellings will be delivered (56 per year) in small villages over the subsequent eight year period (1st April 2025 to 31st March 2033) and at least 23 dwellings per year thereafter. With the 287 dwellings committed being in addition to the 350 dwellings anticipated to be completed across small villages between 2026/27 and 2040/41, there are, in total, 637 dwellings anticipated to be delivered within small villages between 1 April 2025 and 31 March 2041 (an average of only 40 dwellings per annum over this 16 year period).
121. The inclusion of a 117 unit allowance for small villages within the five year housing land supply (1 April 2028 - 31 March 2033) is therefore considered justified, particularly given the 1,095 dwelling capacity identified in small villages for this period, and completions averaging 91 per year between 1st April 2020 and 31st March 2025. Accordingly, for the detailed reasons outlined above the council considers that the Plan's approach is justified and sufficiently accords with NPPF 69 and the definition of 'deliverable' in Annex 2. This is because there are sites available in small villages that offer a suitable

location for development now (as evidenced through the Strategic Housing and Economic Land Availability Assessment Update 2024; [HSG-NLP 4](#)).

Matter 3, Issue 6, Question 2

Q2. The Council includes 222 homes for minor sites (fewer than 10 dwellings) contributing to the 5-year supply from 1st April 2028. What is the robust evidence to justify this approach?

122. The NPPF (Annex 2) is clear that sites which do not involve major development and have planning permission should be considered deliverable until permission expires.

123. The 5 Year Housing Land Supply Statement (Oct 2025) [HSG-NLP10] shows (in Table 2) that on 1st April 2025 there were 539 homes with permission on minor sites. Given these sites meet the NPPF definition (i.e. deliverable within 5 years) it is reasonable to assume that these small sites will be delivered across the 5 year period 2025 to 2030 at an approximate average rate of 107/108 homes per year, bringing the 2028-2030 total to approximately 215 homes (unrounded). In addition, it was considered reasonable to assume that some of the minor sites allocated through neighbourhood plans would also come forward by 2030, overall delivering 222 homes (111 dpa) between 2028 and 2030.

124. The minor sites anticipated to supply 222 homes across 2028/29 and 2029/30 included those for which decisions were issued in either 2023/24 or 2024/25. These minor sites had not completed any dwellings by 1 April 2026.

Accordingly, for the reasons outlined above the council considers that including 222 homes for minor sites in the 5-year supply from 1st April 2028 is justified and accords with the definition of 'deliverable' in Annex 2 of the NPPF

Appendix A of Matter 3: Minor net completions across Tiers 1-4 & 6 (excluding Tier 5) of the settlement hierarchy over 10 consecutive years 15/16 to 24/25

MINOR NET UNITS COMPLETED 15/16 24/25:	
03/00071/FUL	1
04/00947/FUL	1

04/00969/FUL	2
05/01576/FUL	4
05/01796/FUL	1
05/01821/FUL	2
05/01881/FUL	1
06/00318/FUL	2
06/01680/FUL	1
07/00222/FUL	1
07/00244/FUL	1
07/00686/FUL	1
07/01040/FUL	0
07/01256/FUL	4
09/00022/FUL	1
09/00987/FUL	1
09/00995/FUL	1
10/00191/FUL	1
10/00709/REM	1
10/01082/FUL	1
10/01286/FUL	1
10/01359/FUL	2
11/00415/FUL	1
11/00730/FUL	1
11/00734/FUL	1
11/01055/FUL	1
11/01414/FUL	1
11/01521/FUL	7
11/01536/FUL	1
12/01401/FUL	1
12/01661/FUL	1
13/00070/FUL	2
13/00227/FUL	1
13/00245/FUL	1
13/00350/FUL	3
13/00771/FUL	-1
13/00994/REM	2
13/01818/PDN	1
13/01837/FUL	1
13/01864/FUL	4
13/01871/FUL	1
14/00023/FUL	1
14/00429/FUL	1

14/00850/PDN	1
14/01436/FUL	2
14/01502/FUL	1
14/01734/FUL	3
15/00042/REM	1
15/00063/FUL	1
15/00075/FUL	1
15/00097/FUL	1
15/00102/FUL	1
15/00106/FUL	0
15/00174/FUL	1
15/00300/FUL	1
15/00367/FUL	1
15/00369/FUL	7
15/00710/FUL	1
15/00809/FUL	1
15/00871/FUL	1
15/00892/FUL	4
15/00894/FUL	1
15/01077/FUL	1
15/01098/FUL	1
15/01192/FUL	3
15/01527/FUL	2
15/01574/FUL	1
15/01618/FUL	4
15/01651/PDN	1
15/01660/FUL	7
15/02005/FUL	3
15/02018/FUL	1
15/02036/FUL	-1
16/00135/FUL	8
16/00170/FUL	2
16/00231/FUL	1
16/00320/FUL	1
16/00321/FUL	9
16/00344/FUL	1
16/00449/FUL	1
16/00515/FUL	1
16/00631/FUL	1
16/00818/FUL	1
16/00851/REM	1

16/00867/FUL	1
16/00876/FUL	1
16/00958/FUL	2
16/01168/FUL	1
16/01189/FUL	1
16/01264/PDN	1
16/01282/FUL	1
16/01367/REM	1
16/01412/FUL	1
16/01484/FUL	4
16/01535/FUL	1
16/01676/FUL	1
16/01677/FUL	2
16/01754/FUL	1
16/02076/REM	1
17/00055/FUL	1
17/00069/FUL	1
17/00263/PDN	1
17/00419/FUL	5
17/00528/REM	2
17/00568/FUL	1
17/00639/FUL	1
17/00654/FUL	2
17/00677/PDN	1
17/00678/FUL	0
17/00760/FUL	1
17/00763/FUL	1
17/00838/FUL	1
17/01021/FUL	1
17/01064/FUL	1
17/01106/FUL	0
17/01165/FUL	1
17/01182/FUL	1
17/01270/FUL	9
17/01396/FUL	2
17/01503/FUL	1
17/01592/FUL	2
17/01647/FUL	1
17/01744/FUL	1
17/01747/FUL	1
17/01748/FUL	0

17/01766/FUL	2
17/01805/FUL	1
17/01900/REM	4
17/01935/FUL	-3
17/01946/FUL	5
17/02053/FUL	1
17/02120/FUL	1
18/00049/PDN	1
18/00094/FUL	0
18/00121/FUL	1
18/00166/CLU	1
18/00272/REM	6
18/00280/FUL	1
18/00291/FUL	1
18/00321/FUL	1
18/00338/REM	1
18/00409/FUL	1
18/00494/FUL	1
18/00514/FUL	1
18/00720/FUL	1
18/00746/PDN	1
18/00759/FUL	2
18/00778/FUL	1
18/00808/FUL	1
18/00899/FUL	1
18/00926/FUL	1
18/00978/FUL	2
18/00986/CLU	1
18/00994/FUL	0
18/01035/FUL	1
18/01090/FUL	-1
18/01253/FUL	1
18/01267/FUL	6
18/01342/VAC	2
18/01378/FUL	1
18/01436/FUL	3
18/01489/REM	1
18/01582/PDN	1
18/01585/PDN	1
18/01734/FUL	1
18/01784/FUL	1

18/01877/FUL	1
18/01900/FUL	8
18/01947/FUL	3
18/01966/FUL	2
18/01979/FUL	-1
18/01980/FUL	1
18/01986/FUL	-1
18/02108/FUL	1
18/02120/FUL	1
18/02167/FUL	1
18/02173/FUL	1
19/00043/FUL	1
19/00052/FUL	1
19/00160/FUL	3
19/00206/FUL	1
19/00365/FUL	3
19/00434/FUL	1
19/00523/FUL	1
19/00569/FUL	2
19/00661/REM	6
19/00704/FUL	1
19/00753/REM	6
19/00761/FUL	5
19/00834/FUL	1
19/00849/FUL	4
19/00895/FUL	1
19/00896/FUL	1
19/00953/FUL	1
19/01027/FUL	6
19/01128/FUL	1
19/01155/REM	1
19/01373/FUL	3
19/01491/FUL	1
19/01683/FUL	8
19/01755/FUL	3
19/01809/FUL	2
19/01838/FUL	1
19/01907/FUL	1
19/01914/PDN	4
19/01938/FUL	3
20/00091/FUL	6

20/00163/FUL	1
20/00205/FUL	1
20/00299/FUL	1
20/00341/REM	3
20/00373/INIT	1
20/00446/PDN	7
20/00481/FUL	2
20/00513/FUL	1
20/00569/FUL	1
20/00616/FUL	1
20/00759/FUL	2
20/00782/FUL	1
20/00879/FUL	1
20/00943/DLABN	-1
20/00948/FUL	0
20/01195/FUL	0
20/01269/PDN	1
20/01395/FUL	2
20/01490/FUL	1
20/01500/FUL	1
20/01608/CLU	-1
20/01785/FUL	1
20/01856/FUL	1
20/02016/REM	4
21/00191/FUL	1
21/00232/FUL	4
21/00331/FUL	3
21/00427/FUL	1
21/00733/REM	1
21/00799/FUL	2
21/00806/FUL	1
21/01123/REM	9
21/01140/FUL	2
21/01232/FUL	1
21/01234/FUL	1
21/01358/FUL	2
21/01543/VAC	3
21/01688/FUL	0
22/00018/FUL	1
22/00063/REM	1
22/00757/FUL	0

22/00758/PDN	5
22/00892/FUL	2
22/00928/FUL	1
22/01298/FUL	4
22/01568/FUL	1
22/01729/FUL	1
22/01776/FUL	-1
22/01946/REM	1
22/01953/FUL	9
23/00224/FUL	1
23/00366/INIT	5
23/00566/FUL	1
23/00841/FUL	1
23/01162/CLU	0
23/01809/FUL	1
24/01321/FUL	1
GG/PD/Subdivis	1
	453