

Written Statement

On Behalf of Davidsons Developments Limited
Harborough Local Plan to 2041 - Examination

Matter 7: Locating Development in the Right Place
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1. ISSUE 1 – DIRECTING DEVELOPMENT TO THE RIGHT PLACE

Q1. How Policy AP01 sets out that in addition to sites allocated in Plan policy SA01, development will be permitted within the existing built-up area or settlement limits (Policy AP01 criterion 2), and on land adjoining the existing built-up area settlement limits (Policy AP01 criterion 3), subject to certain criteria. However, does the Plan define these terms in relation to each settlement in the settlement hierarchy? In this regard would the policy be effective in its application?

1.1. No Comment

Q2. Given the above, how would policy AP01 interact with policy AP03 and AP04 in relation to development in the countryside?

1.2. No Comment

Q3. Are the criteria in policy AP01 criterion 2 clear and unambiguous so that it is evident how a decision maker should react to development proposals, and thereby accord with NPPF paragraph 16d?

1.3. No Comment

Q4. Would policy AP01 criterion 3f provide the necessary clarity for decision makers and applicants through the development management process? Would it be necessary, in the interests of soundness, to include within policy AP01 3f for circumstances where Plan policies most important for determining the application are out of date due to the lack of the five-year housing land supply?

1.4. No Comment

Q5 Policy AP01 criterion 4 excludes Green Wedges and Areas of Separation site allocations and existing commitments from the definition of land adjoining the existing built-up area/settlement limits. Is this approach justified by the evidence and consistent with national policy?

1.5. The exclusion of allocated sites from the operation of Policy AP01 is supported. Land north of London Road and east of Leicester Grammar School is allocated through Policy SA01 and governed by the site-specific requirements of Site Ref GG1

Q6 Would Plan policies support development to achieve Made Neighbourhood Plan housing needs?

1.6. No Comment

2. ISSUE 2: KEY DEVELOPMENT SITES

Q1 Are the following proposed residential development/mixed use and employment allocations justified, based on up-to-date evidence, effective, and consistent with national policy?

- 1.7. **Yes.** The allocation of GG1 under Policy SA01 is justified, based on up-to-date evidence, effective and consistent with the December 2023 NPPF.
- 1.8. It is justified as Great Glen is appropriately identified for growth through the settlement hierarchy as a 'Larger Village' and through the development strategy set out in Policy AP01. Larger Villages are established as having range of services and facilities and the allocation will make an important contribution towards meeting Harborough's housing requirement in addition to Leicester's unmet need.
- 1.9. The allocation is based on up-to-date evidence as it is supported by the Council's 2025 Site Assessment Report¹. This concludes that the site is well related to the existing built form of Great Glen, is in keeping with the scale of development identified for the village and compares favourably when considered against alternative sites. The assessment identifies the site as a preferred allocation, noting it's low to moderate landscape sensitivity, location within Flood Zone 1 and relationship with the existing village and Leicester Grammar School.
- 1.10. The allocation is also effective and deliverable. The site is controlled and actively promoted by Davidsons, an established housebuilder within the Midlands Region and is the subject of outline planning application 25/01467/OUT² for up to 450 dwellings. The submission of the application, supported by detailed technical evidence and an illustrative masterplan (Appendix 1), demonstrates both a clear commitment to delivery and the capacity of the Site to accommodate up to 450 dwellings, rather than the 400 dwellings identified by the allocation. This provides confidence that the allocation is effective, achievable and capable of being delivered in full within the Plan period.
- 1.11. Overall, the allocation is consistent with national policy. It supports the delivery of a sufficient supply of homes in a sustainable location, is supported by an appropriate evidence base and is capable of being delivered alongside the necessary infrastructure and wider community benefits, including potential sports pitch/ community hub provision. The allocation therefore represents sustainable development and satisfies the relevant tests of soundness in paragraph 35 of the December 2023 NPPF.

Additional Site-Specific Questions - LEICESTER URBAN AREA

Great Glen Site GG1: Land north of London Road and east of Leicester Grammar School (400 homes)

¹ [Site Selection Methodology Feb 2025 | Harborough District Council](#)

² [25/01467/OUT | Outline application \(all matters reserved except for access\) for the construction of up to 450 dwellings, new accesses, new car park serving Leicester Grammar School, sports/recreation/community hub and associated facilities, and ancillary infrastructure | Land North Of London Road Great Glen Leicestershire](#)

Q1 How would Plan policy SA01 GG1 criterion 1b interact with Plan policy DS05 criterion 1d (ii) and criterion 2, which requires a comprehensive approach to coordinating the provision, phasing and funding of infrastructure taking account of the cumulative and cross boundary impacts arising from the cluster of sites at Oadby and Great Glen?

- 1.12. Policy SA01 GG1 criterion 1b and Policy DS05 should operate together in a proportionate manner. Criterion 1b establishes the site-specific requirement for GG1 to provide the infrastructure necessary to support the allocation, while Policy DS05 provides the wider framework for coordinating infrastructure where cumulative or cross-boundary impacts arise from the 'Oadby and Great Glen cluster'.
- 1.13. However, policy DS05 should not seek to treat GG1 and OA1 as a single development cluster for infrastructure planning or delivery purposes. GG1 is a separate and independently allocation that is capable of coming forward significantly earlier than OA1. Requiring a comprehensive or joint approach across the two allocations risks making the delivery of GG1 dependent upon the preparation, agreement or funding of infrastructure associated principally with OA1, despite this neighbouring allocation operating under a lengthier programme.
- 1.14. The policies should instead establish a clear, site-specific approach under which GG1 delivers and funds the infrastructure necessary to mitigate its own impacts. Where robust evidence identifies a genuinely cumulative impact arising from both allocations, this can be addressed through proportionate coordination and contributions. However, GG1 should not be required to enter a single masterplan, joint infrastructure framework or common delivery schedule with OA1, nor should it contribute towards infrastructure required primarily to enable that allocation.
- 1.15. A separate approach is necessary to ensure that Policy DS05 does not delay an allocation that is already being actively promoted and is capable of delivery earlier in the Plan period. Policy SA01 GG1 criterion 1b should therefore operate independently of OA1, with any coordination limited to specific cumulative or cross-boundary matters that are supported by clear evidence. This would protect the effectiveness and delivery of GG1 while allowing any evidenced impacts to be addressed where they arise.

Q2. Would policy SA01 GG1 criterion 4 effectively address the transport impacts (including cumulative impacts) of development along the A6? Would it ensure a coordinated approach to active forms of transport across and beyond the site?

- 1.16. We firstly assume that the question is meant to reference **Criterion 3** and not criterion 4 of Policy SA01 GG1 and we will therefore reference it as such in response to the question.
- 1.17. GG1 has been assessed considering the cumulative traffic impact of development. As explained in the Interim Transport Assessment³ that accompanied the planning application, and the subsequent Traffic Impact Technical Note, the development's traffic impacts have been assessed using PRTM2023 – the County Council's Pan-Regional Transport Model. A 2035 future scenario has been examined, to include all committed development and

³ https://pa2.harborough.gov.uk/online-applications/files/942B3E45ECB78D34AC79A7E6C4E5D11A/pdf/25_01467_OUT-TRANSPORT_ASSESSMENT-1433771.pdf

infrastructure changes anticipated to be implemented by that time. A sensitivity test scenario was also run, that included all draft allocations in the Local Plan, including OA1. For each of these planned and committed developments, the quantity of development anticipated to be occupied by 2035 was identified and its traffic included in the modelling. Thus, developments with a different programme are allowed for in a proportionate manner.

- 1.18. The outputs from the model are traffic forecasts in 2035 without the GG1 development, and with the GG1 development. Thus, while the cumulative increase in traffic is addressed, so too is the specific impact of GG1. In that way, it can derive a package of mitigation measures specific to GG1's impact. The traffic forecasts allow an assessment of where traffic changes would be material, in an Area of Influence. That was subsequently refined through consultation with both the City Council and County Councils, to include additional parts of the road network that are deemed sensitive and hence a study area was derived.
- 1.19. The A6 was part of that study area, and the junctions along its length have been assessed in detail to understand how they would perform with the future traffic forecasts. Where necessary mitigation has been identified. Nothing has been identified that would prevent the development from proceeding. This is the correct evidence-led approach as the cumulative effects on the A6 can be considered through the Transport Assessment process while clearly identifying the additional impact attributable to GG1. It does not require GG1 and OA1 to be combined into a single assessment, infrastructure package or delivery programme.
- 1.20. The same is true of the coordination of active forms of travel. Provisions for GG1 have been derived based on its demands, such as improved bus services and enhanced cycle routes. Additional demands from other developments may require further provisions in the future to deal with those demands. The coordination of provisions is delivered through the consultation responses of the highway authorities and alignment with their Bus Service Improvement Plan, and Local Cycling and Walking Infrastructure Plan, that set out a coordinated plan for the progressive delivery of future infrastructure.
- 1.21. Criterion 3 is therefore capable of operating effectively, provided it is applied proportionately. GG1 should be required to assess and mitigate its own transport impacts, including any proportionate contribution to cumulative effects identified through agreed modelling. However, the policy should not be interpreted as requiring a joint transport strategy, infrastructure package or delivery programme with OA1, given the different nature and anticipated delivery trajectories of the two allocations.

Q3. What is the robust evidence that wastewater and sewerage infrastructure will be available to serve this development?

- 1.22. **Yes.** The Council's Infrastructure Delivery Plan 2025⁴ (IDP) confirms that Severn Trent Water has assessed the effects of the proposed Local Plan growth on both the sewerage network and wastewater treatment works. The potential impact of GG1 on sewerage infrastructure is identified as high, meaning capacity improvements are likely although its impact on surface water sewerage infrastructure is assessed as low. Importantly, Severn Trent Water concludes that the proposed level of growth can be accommodated at Great Glen Wastewater Treatment Works.
- 1.23. The IDP acknowledges that the precise scope of any network improvements has not yet been established although it concludes that wastewater growth can be accommodated alongside planned improvement schemes and that the detailed assessment of network requirements will take place through the development management process. This is not identified as an infrastructure constraint to the allocation as more generally, the IDP confirms that there is no infrastructure "show stoppers" preventing delivery of the preferred growth strategy.
- 1.24. This strategic evidence is supported by the site-specific work undertaken for the outline planning application. A developer enquiry was submitted to Severn Trent Water, whose response identified available manhole connection points off Heron Close and Bridgewater Drive. The submitted Flood Risk and Drainage Assessment⁵⁶ proposes a split foul drainage strategy, with flows from the northern and southern parts of the development conveyed by separate gravity networks to those respective connection points.
- 1.25. Taken together, the IDP and application evidence demonstrate that wastewater treatment capacity is available and that feasible points of connection to the existing sewerage network have been identified. Any necessary reinforcement and the final connection arrangements can be agreed with Severn Trent Water through the development management and statutory connection processes.

Q4. Policy SA01 GG1 criterion 1 requires a comprehensive masterplan. It does not refer to Plan appendix 6. In this regard, would the policy clearly set out that a masterplan will be required, who should prepare it and what the timescale for its provision and approval mechanism would be? How does this relate to the requirement for a masterplan for policy SA02?

- 1.26. Policy SA01 GG1 criterion 1 requires a comprehensive masterplan and therefore engages Policy SA01 criterion 2, which expressly states that, "*where a masterplan is required, this should address the site-specific requirements set out in Appendix 6.*" The relationship

⁴ [Infrastructure Delivery Plan Feb 2025 | Harborough District Council](#)

⁵ https://pa2.harborough.gov.uk/online-applications/files/7B9CD0B17D271FC2937ACC37625BB1B7/pdf/25_01467_OUT-FRA_AND_DRAINAGE_STRATEGY_PART_1_OF_2-1433960.pdf

⁶ pa2.harborough.gov.uk/online-applications/files/415A7FF702DCA67A3F0C969E4FB102FB/pdf/25_01467_OUT-FRA_AND_DRAINAGE_STRATEGY_PART_2_OF_2-1433770.pdf

between the GG1 masterplan and Appendix 6 is therefore already established within Policy SA01 therefore is not deemed necessary for criterion 1 to repeat the reference.

- 1.27. However, the remaining question is whether Policy SA01 needs to prescribe who should prepare the masterplan, its timing and a separate approval mechanism. In the case of GG1, these matters have already been addressed through the submission of the outline planning application.
- 1.28. The site is controlled by a single developer (Davidsons) and is intended to be delivered as one coherent development. The outline application for up to 450 dwellings includes an illustrative masterplan and Design and Access Statement, supported by detailed technical evidence. While prepared in advance of the emerging Local Plan, these documents already address many of the matters now identified in Policy SA01 and Appendix 6, including the site's spatial framework, movement network, green infrastructure and response to constraints.
- 1.29. There is consequently no justification for requiring a further standalone masterplan, or a separate approval process outside the determination of the outline application. Such a requirement would duplicate work already undertaken and could introduce unnecessary uncertainty or delay. Policy SA01 should instead recognise that the masterplan may be prepared and approved through the development management process, including as part of an outline planning application. The reference to 400 dwellings should also be amended to allow for the 450 dwellings demonstrated through the submitted outline application.
- 1.30. In terms of the relation with the Masterplan requirements of Policy SA02, these should continue to remain separate. GG1 is a village extension to Great Glen, whereas SA02 much larger strategic development related to the Leicester Urban Area, with different land interests, infrastructure requirements and delivery timescales. The Area of Separation will maintain the distinct identity of the two developments and the settlements to which they relate. There is therefore no justification for a joint masterplan between GG1 and SA02.

Q5. How would development of this site reinforce an Area of Separation between Great Glen and Land South of Gartree Policy SA02)?

- 1.31. The Area of Separation is important in maintaining the distinct identities of GG1 and the strategic development proposed through Policy SA02. GG1 would remain a clearly defined extension to Great Glen, while the Area of Separation would prevent coalescence with development south of Gartree Road and maintain a clear distinction between the two allocations.
- 1.32. The outline application reflects this as the illustrative masterplan demonstrates that development is concentrated within the southern part of GG1, closely related to the existing built form of Great Glen and Leicester Grammar School, while the northern extent of the site is retained for habitat enhancement. Existing trees and hedgerows would be reinforced, with new woodland and boundary planting providing a defined and landscaped settlement edge.

- 1.33. The Landscape and Visual Impact Assessment⁷, submitted within the Environmental Statement accompanying the outline application, confirms that GG1 and SA02 are separated by existing landform, vegetation and development. There would be limited opportunities to view the two developments together and no significant cumulative visual effects are expected. The Area of Separation should therefore be retained to prevent coalescence and maintain GG1 as a distinct extension to Great Glen.

Q6. Would policy SA01 GG1 part 9 in requiring ‘... no impacts to the amenity of development...’ in relation to waste safeguarding areas be justified and effective?

- 1.34. Policy SA01 GG1 criterion 9 is not justified or effective as presently drafted. The nearest safeguarded facilities appear to be Great Glen Sewage Treatment Works, approximately 1 km south-east of GG1, and Little Stretton Sewage Treatment Works, approximately 2.18 km to the north based on the Leicestershire County Council waste safeguarding maps⁸. Given these distances and the intervening development and landscape features, there is no clear evidence that GG1 would prejudice their continued operation or that they would materially affect the amenity of future residents.
- 1.35. The requirement to demonstrate “no impacts” is also very absolute, as the relevant consideration should be whether any unacceptable material effects would arise. Criterion 9 should therefore be deleted unless the Council can identify a clear safeguarding or amenity concern.

Q7. How would policy SA01 GG1 criterion 8 effectively mitigate any flood risk with particular regard to surface water flood risk? Would it effectively address the requirement for betterment in flood risk terms given it is upstream and close to Great Glen?

- 1.36. **Yes.** The Council's evidence base records that whilst there are limited areas of surface water flood risk associated with the wider watercourse network, these matters can be addressed through attenuation storage and site-specific assessment. The site is therefore not constrained by flood risk and has been identified as capable of accommodating development subject to appropriate mitigation measures. The Level 2 SFRA⁹ similarly identifies that, although parts of the wider area are sensitive to surface water flooding and climate change, they are capable of being addressed through detailed Flood Risk Assessment, sustainable drainage design and appropriate development layout.
- 1.37. This conclusion is reinforced by the detailed technical work submitted in support of the outline planning application. The accompanying Flood Risk Assessment and Drainage Strategy demonstrate that surface water can be managed through a comprehensive sustainable drainage strategy, including attenuation storage, controlled discharge rates and appropriate climate change allowances. The proposed drainage approach provides runoff rates below existing greenfield conditions and has been accepted by the LLFA as being compliant with current SuDS standards and local policy requirements.

⁷ [25_01467_OUT-ENVIRONMENTAL_STATEMENT_VOLUME_1-1435115.pdf](#)

⁸ [S3/2015 - Minerals and waste safeguarding \(Harborough\)](#)

⁹ [Strategic Flood Risk Assessment Level 2 Dec 2024 | Harborough District Council](#)

- 1.38. As part of the outline application, further discussions are ongoing with the LLFA relating to primarily to the assessment of wider downstream flood risk and the extent to which additional betterment can be demonstrated within the broader catchment. These discussions do not relate to the ability of the site itself to accommodate development but rather reflect ongoing work to better understand existing flooding mechanisms affecting parts of Great Glen. To assist this process, the applicant is undertaking additional hydraulic modelling in consultation with the LLFA.

Q8. There are a number of designated heritage assets within the locality. What is the robust evidence that development of this site would not harmfully impact their significance?

- 1.39. The Council 2025 Site Assessment Work identified that given the separation distances involved, development of up to as high as three storeys (which are not proposed as part of the development) would be unlikely to affect the significance of Stretton Hall or its associated listed buildings. These conclusions have been subsequently tested through the Heritage Impact Assessment¹⁰ (HIA) submitted with the outline planning application, which considers both the significance of heritage assets within a 1km study area and the contribution made by the Site to their settings.
- 1.40. The HIA identifies three listed buildings requiring detailed assessment: Cricks Retreat and 39 London Road, both Grade II listed, and Stretton Hall, which is Grade II* listed. The remaining designated heritage assets within the study area were screened out and there are no designated heritage assets within the Site itself
- 1.41. In relation to Cricks Retreat and 39 London Road, the assessment concludes that the proposed masterplanning and landscaping would maintain the limited contribution made by the south-western part of the Site to their settings. The wider Site makes no meaningful contribution to their significance because of intervening development and vegetation and the established presence of Leicester Grammar School. The proposed development would therefore cause no harm to the significance of either listed building.
- 1.42. Stretton Hall is located approximately 800m north of the Site, beyond intervening fields, existing development and vegetation. The HIA concludes that the Site does not form part of the Hall's setting and that there are no designed or incidental views between the two which contribute to its significance. Accordingly, the development would not harm the significance of Stretton Hall. The evidence therefore provides a robust basis for concluding that GG1 can be developed without harm to designated heritage assets.

Q9. Would the requirements of policy SA01 GG1 criterion 6 be clear and unambiguous in relation to new sports/ community hub and pitches? How would development on this site ensure integration with sports facilities in the locality?

- 1.43. Criterion 6 clearly establishes the requirement for GG1 to provide a new sports and community hub and associated pitches. This requirement has been reflected in the outline planning application, with the illustrative masterplan identifying a dedicated "hub" area for

¹⁰ https://pa2.harborough.gov.uk/online-applications/files/22BAC6F53ADA735BB2D3C2957C2B0C9B/pdf/25_01467_OUT-HERITAGE_IMPACT_ASSESSMENT-1433774.pdf

sports and community provision. The proposed facilities would be connected to the residential development through pedestrian and cycle routes and would be accessible to both future residents and the existing Great Glen community.

- 1.44. The precise scale, function and delivery arrangements for the hub should retain sufficient flexibility to respond to identified local needs. These matters can be resolved through detailed design and appropriate planning obligations, following continued engagement with Harborough District Council, Great Glen Parish Council and relevant sports organisations. This approach would ensure that the facilities are respond to the requirements of local clubs and requirements.
- 1.45. In that regard, there is a clear opportunity to coordinate the proposed hub with the existing facilities at Great Glen Recreation Ground, where potential improvements have already been identified. Integration does not necessarily require a direct physical connection between the two sites. It can be achieved by ensuring that the proposed facilities perform a complementary role, respond to existing gaps in provision and form part of a coordinated approach to sports and community facilities across Great Glen.

Q10. Would the requirements of policy SA01 GG1 criterion 10 in relation to minerals safeguarding areas be accurate, clear and unambiguous? How would the policy address the safeguarded waste sites at Great Glen and Little Stretton.

- 1.46. The question appears to contain an incorrect policy criterion reference, as Policy SA01 GG1 contains 9 criteria and does not include a criterion 10 relating to minerals safeguarding. Furthermore, the adopted minerals and waste safeguarding evidence¹¹ does not identify GG1 as falling within a Minerals Safeguarding Area.
- 1.47. The separate matter of the safeguarded waste sites at Great Glen and Little Stretton has been addressed in response to Question 6. There is no evidence that development of GG1 would prejudice their continued operation, subject to appropriate consideration of any potential amenity effects through the development management process.

Word Count – 3000

¹¹ [S3/2015 - Minerals and waste safeguarding \(Harborough\)](#)

3. APPENDIX A: ILLUSTRATIVE MASTERPLAN – LAND NORTH OF LONDON ROAD AND EAST OF LEICESTER GRAMMAR SCHOOL

