

Harborough District Council Response to Panel Note 2: Preliminary Questions
(dated 2 June 2026)

12 June 2026

The Council thanks the Panel for the note and confirmation that the Plan will be examined against the version of the NPPF published in December 2023.

Outstanding documents

The outstanding documents listed in HDC1 are currently being worked on with partners to ensure they are ready for publication by the dates listed in Panel Note 2.

The first of such documents, the Leicester & Leicestershire Updated Housing Mix Evidence HSG-NLP12 (together with a note explaining its relevance to the Harborough Local Plan) is being published on the Examination webpage.

The following sets out each of the questions raised in Panel Note 2, followed by the Council's response.

Q1 Does the 'further work being finalised' referred to in the Council's Preexamination Checklist Response document [SNLP14] mean documents listed in Table 2 of HDC1, or any other documents?

Yes. The Council formally confirms that the "*further work is being finalised*" used in the Council's Pre-examination Checklist Response [[S-NLP 14](#)] refers exclusively to the suite of documents now set out in Table 2 of the Council's response to Panel Note 1 [[HDC1](#)]. All documents identified at that stage have been comprehensively captured within that table.

Q2 Is the submission Plan [SNLP1] the same as that used in the Regulation 19 consultation?

Yes

Q3 Was the Plan prepared in accordance with the Council's local development scheme as required by section 19(1) of the 2004 Act?

Yes. The Plan was prepared in accordance with the latest Local Development Scheme (LDS) [[S-NLP 6](#)], dated November 2025. The LDS was initially agreed in December 2023 to reflect the anticipated timetable for preparation of the Local Plan at that time. Updates to the timetable were agreed in March 2025 and November 2025. The table below sets out the timetable of the Local Plan preparation as set out in the LDS against which has been achieved.

Adopted LDS	LDS Requirement	Date Achieved
December 2023	Target date for Issues and Options Consultation	Issues and Options consultation between 16 th January and 27 th February 2024

	(Regulation 18) - Between January and February 2024	
March 2025	Target date for Proposed Submission Local Plan Consultation (Regulation 19) - Between March and May 2025	Proposed Submission Local Plan Consultation between 10 th March and 6 th May 2025
November 2025	Target date for Submission of the Local Plan for Examination (Regulation 22) - March/April 2026	Submission to the Secretary of State on 17 th April 2026
	Target date for adoption (Regulation 26) - December 2026/January 2027	

Q4 Were any concerns raised in representations made under regulation 20 that the consultation carried out during the preparation of the Plan failed to comply with the statement of community involvement or any relevant legal requirements?

Two representations considered the Statement of Community Involvement (SCI) was outdated and therefore breached legal requirements. These were representation ID 13464 and 13253 (can be viewed in [S-NLP 11](#)). Two further representations raised concerns with the consultation process and legal compliance but without reference to any specific legal requirements. These were representation ID 13461 and 13446 (can be viewed in [S-NLP 11](#)).

For context, the previous SCI was adopted on 24 February 2020. A review of this SCI was conducted prior to formal consultation on the Proposed Submission Draft Local Plan to ensure it was up to date and to verify legal compliance. The review concluded that the SCI complied with relevant legislation and guidance and although some minor, factual updates were needed, it would not change the Council’s approach to community involvement in plan-making. The revised SCI [[S-NLP 5](#)] was adopted in June 2025.

Q5 Which policies in the Plan are designed to secure that the development and use of land contribute to the mitigation of, and/or adaptation to, climate change?

As set out in the Climate Change Topic Paper [[TPC-NLP 1](#)], climate change is a cross-cutting theme embedded throughout the Local Plan, particularly the following policies which collectively form a framework that meets the statutory requirement to contribute to the mitigation of, and/or adaptation to, climate change:

- **Policy DS03 Development Strategy: Tackling Climate Change and Enhancing the Natural Environment** establishes the overarching climate framework for the Plan by promoting low-carbon travel, resource-efficient development, and the protection and enhancement of green and blue infrastructure that improves flood resilience, supports carbon sequestration, and strengthens ecological adaptation to climate change.

- **Policy DM01 High Quality Inclusive Design** embeds climate-responsive design principles, such as incorporating water and energy efficiency measures in new buildings, protecting/enhancing existing natural assets, promoting opportunities for sustainable public transport and active travel modes, and providing open spaces along with links to the wider green infrastructure network.
- **Policy DM05 Green and Blue Infrastructure and Open Space** contributes to wider climate change resilience through requiring all development to contribute to high quality multifunctional green and blue infrastructure which provides access to shade and manage surface water run-off, contributing to wider climate change resilience.
- **Policy DM06 Transport and Accessibility** seeks to support a modal shift away from private car use by promoting walking, cycling and public transport connectivity including measures such as provision for EV charging and car club spaces, thereby helping to reduce carbon emissions.
- **Policies DM07 Managing Flood Risk** seeks to steer development away from high-risk flood areas to ensure development actively reduces and manages future flood risk.
- **Policy DM08 Sustainable Drainage** addresses climate change by requiring climate resilient, nature-based drainage and water management that reduces flood risk, manages increased rainfall, improves water efficiency, and explicitly allows for future climate change impacts in design and runoff calculations
- **Policy DM09 Sustainable Construction and Climate Resilience** requires sustainable construction and climate resilience measures, including whole life-cycle carbon assessments, minimum energy and water efficiency standards, passive design measures, and waste minimisation.
- **Policy DM10 Biodiversity and Geodiversity Protection and Enhancement** seeks to safeguard and enhance biodiversity and geodiversity across the district, while also supporting climate change adaptation through habitat resilience, ecological connectivity and carbon sequestration.
- **Policy AP05 Locating Renewable and Low-Carbon Energy** supports renewable and low-carbon energy development, including appropriately located solar and wind schemes, thereby promoting local decarbonisation and energy resilience.

Q6 Which parts of the Plan identify the Council’s strategic priorities for the development and use of land in the District as required by section 19(1B) of the 2004 Act? Does the Plan provide the necessary clarity for those using it?

As set out in our response to CR10 within the Council’s Pre-examination Checklist Response [[S-NLP 14](#)], paragraph 1.15 of the submission Plan [[S-NLP 1](#)] provides a clear, sufficient, and legally compliant basis for identifying the strategic policies, ensuring full clarity for developers, decision-makers, and the public.

However, to assist the Examination and maximize transparency, the Council compiled a detailed schedule of strategic policies [[S-NLP 14](#)]. Should the Inspectors conclude that

explicit, formal signposting of this schedule is required within the text of the Plan itself to satisfy section 19(1B) of the 2004 Act, the Council is fully prepared to incorporate this schedule via the Main Modifications process during the hearings.

Q7 Were any concerns raised in representations made under regulation 20 that the Plan is likely to adversely affect persons who share relevant protected characteristics as defined in s149 of the Equality Act 2010 or that the Council failed to have due regard to the Public Sector Equality Duty?

Two representations (IDs 14167 and 14101 [S-NLP 11](#)) raised concerns that reliance on the previous PPTS definition for policy HN06 would not address the accommodation needs of all Gypsy and Traveller and travelling showpeople leading to an adverse impact on a protected ethnic group.

In response, the Council proposed modifications to Policy HN06 ([S-NLP 15](#)) to reflect the most up-to-date requirements in accordance with PPTS 2024, increasing provision for Gypsy and Traveller and travelling showpeople accommodation. These changes ensure the Local Plan better addresses the needs of this protected group, supports compliance with the Equality Act 2010, and responds directly to the concerns raised in representations.

Q8 Do any representations made under regulation 20 claim that the sustainability appraisal failed to identify reasonable alternatives to the Plan or comply with the relevant legislation for other reasons?

One representation was received under Regulation 20, that specifically considered the Sustainability Appraisal (SA) had not fulfilled its legal requirements because the employment options tested did not include a quantum of development at each 'growth level' or the location of that growth. This representation ID 13903 was made by Pegasus Group on behalf of Ashfield Land (Respondent ID 7425).

A further 14 representors who made submissions at Regulation 20 commented on the alternatives tested, or not tested, in the SA including:

- Low Option (District meeting its own LHN) – whether this is a reasonable alternative
- Housing alternatives – not testing a higher (than High) more aspirational option / scenario
- Refined Options - not testing Higher (or Lower) growth levels across all the refined options
- Preferred (chosen) option – not previously being tested through the SA (prior to Reg. 19).

Representors cite a range of other reasons for their comments, without reference to any failure of the SA to identify reasonable alternatives to the Plan or to comply with relevant legislation. Representations made about the SA under Regulation 20 can be viewed on the 'SA tab' in submission document [\[S-NLP 11\]](#).

Q9 Would the Plan have any significant adverse effect on sites of ecological importance as defined in the Conservation of Habitats and Special Regulations 2017, which cannot be adequately mitigated? Has any concern been raised by Natural England to the Habitats Regulations Assessment [SNLP4]?

No. Chapter 6 paragraph 6.4 of the Habitat Regulation Assessment [[S-NLP 4](#)] concludes no adverse effect, subject to the successful implementation of safeguarding and mitigation measures. The Draft Harborough Local Plan (as submitted) contains policy wording to require the safeguarding and mitigation measures detailed in Chapter 5.

No concerns have been raised by Natural England to the HRA [[S-NLP 4](#)].

Q10 Has a sequential, risk-based approach been taken to the location of development in the Plan in relation to flood risk? If so, what evidence is there to show that such an approach has been used in the allocation of sites in the Plan?

Yes, a sequential, risk-based approach has been adopted to the location of development in relation to flood risk. As part of the Sequential and Exception Test [[EN-NLP 9](#)], Section 3 sets out how the sequential test was carried out to ensure that, wherever possible, sites at the lowest risk of flooding from all sources were proposed for allocation. The 13 proposed site allocations which did not pass the sequential test underwent the Exception Test outlined in Section 4 with the assessment forming Appendix 5. All sites were found to pass the Exception Test.

From the outset, the SHELAA excluded sites fully within FZ3b (functional floodplain) in line with the Joint Leicester and Leicestershire SHELAA Joint Methodology Paper [[HSG-NLP 1](#)]. For those sites partially within FZ3b, the developable site area was reduced accordingly. In 2024, the Council prepared a new Level 1 SFRA [[EN-NLP 6](#)] followed by a Level 2 SFRA [[EN-NLP 7](#)]. Evidence within the SFRA documents, particularly Appendix B of the Level 2 SFRA (Site Screening Schedule), provided an up-to-date picture of potential sites and their flood risk. These outcomes fed into Stage 4 of the Site Selection Methodology (Appendix 4: Technical Site Assessments) Site Selection Methodology [[PRE-NLP 5](#)] along with any comments received from the Lead Local Flood Authority (Leicestershire County Council) on surface water/drainage issues. This information fed into the wider assessment of sites alongside other settlement level issues/considerations and ultimately the identification of preferred allocations for individual settlements.

To ensure that flood risk evidence reflected the most up to date information available, the SFRA Level 2 Addendum [[EN-NLP 8](#)] was prepared in August 2025. This provided an overview of the newly published Environment Agency NaFRA2 mapping, a summary of the risk shown at the sites assessed within the Level 2 SFRA compared with the new NaFRA2 mapping, and recommendations for developers. The overall outcomes are set out in Section 3 of the Addendum. This ensured that any changes to the risk from fluvial and surface water flooding were identified. Significant changes to flood risk relating to allocations were taken forward for consideration in the update to the Sequential and Exception Test carried out in September 2026 [[EN-NLP 10](#)]

Q11 In the context of strategic policy DS04 dealing with preserving and enhancing our heritage and rural character, what is the robust justification for the Plan's approach on this matter?

As a result of its historic development the Harborough District has a rich historic environment (both built and natural environment). This is demonstrated by the large number and high designation of assets. The landscape is varied and appreciated locally as the backdrop to the largely rural character of the district and as the setting for its towns, villages (many of which are conservation areas) and other heritage assets (both designated and non-designated). The heritage assets are often clustered within villages and play a large part in defining the character of the landscape and the individuality of settlements. These assets contribute to the historical depth and identity of the landscape.

Concentrating development activity within the defined areas helps maintain the character of the district and avoid the gradual erosion of the historic environment by avoiding piecemeal or cumulative developments that could weaken the integrity of conservation areas and the landscape character of the district in which the heritage assets sit. This will help conserve the historic environment for the enjoyment of this and future generations.

The policy complies with the NPPF. It has been informed by Historic England's GPA 1: The Historic Environment in Local Plans and has regard to the Harborough District Council Conservation Area statements and appraisals and the Historic Environment Record for Leicestershire and Rutland (which contains non-designated heritage assets including those identified through Neighbourhood Plans and the Council's Local List).

Evidence contained within the Local Plan Evidence Base:

- The Landscape Character Assessment [[LAN-NLP 2](#)] recognises that Harborough District has a long history of human settlement. Figure 3.8 in the Landscape Character Assessment [[LAN-NLP 2](#)] is a map showing all cultural heritage designations in the Harborough District. From this it can be seen that designated heritage assets are often clustered within villages. The document notes that these assets play a large part in defining the character of the landscape and the individuality of particular settlements. Such individuality is also highlighted in the conservation area appraisals and by the non-designated heritage assets identified in the district's neighbourhood plans. The agricultural heritage of the district can also be evidenced by the ridge and furrow earthworks that are a recurring feature across the district's landscape.
- Green Wedges and Areas of Separation [[LAN-NLP 4](#) Green Wedge Assessment and [LAN-NLP 3](#) Area of Separation Study] have been defined where the potential for coalescence between towns and villages is highest. This is to ensure that towns and villages retain their unique identity and that the overall landscape character of the area is maintained.

- The site-specific development allocation policies also address the protection of heritage. In addition to the site selection policies [[PRE-NLP 5: Site Selection Methodology Feb 2025](#)] and [[PRE-NLP 6: Site Selection Methodology Addendum – Assessment of Large Strategic Sites Nov 2025](#)], the site-specific policies have been informed by [HFC-NLP 1: Heritage Analysis of Local Plan Sites Nov 2024](#) and [[HFC-NLP 2: Heritage Analysis of Local Plan Sites Addendum Feb 2026](#)].

Further explanation of, and justification for the approach to Areas of Separation and Green Wedges can be found in [[TPC-NLP 11: Green Wedges, Areas of Separation and Landscape Topic Paper, March 2026](#)].

Q12 Could the Council list any policies in the Plan that refer to a supplementary planning document or other document, and if necessary, prepare main modifications (MMs) to ensure that the requirement relating to each is justified?

The Council has undertaken a comprehensive audit of the Submission Plan [[S-NLP 1](#)] and the Schedule of Proposed Modifications to the Submission Plan [[S-NLP 15](#)].

No policies within the Plan refer to Supplementary Planning Documents. However, several policies cross-reference technical standards, supporting evidence, strategies, site specific agreements, or development plan documents. The Council recognises that it is not justified to require proposals to “comply” or be “in accordance” with non-development plan documents. To ensure the Plan is fully justified and effective, the Council had identified 27 policy instances referencing other documents. Where the policy currently implies mandatory compliance rather than “having regard to”, and it cannot be justified, the Council proposes Main Modifications as set out in the schedule below.

Policy Ref	External Document Referenced	Current Wording	Proposed Modification/Action
Submission Plan [SNLP1]			
DS03	Nature Recovery Strategy and Leicestershire, Leicester and Rutland Nature Recovery Strategy	Development will be permitted where it contributes to the delivery of national and local Nature Recovery Strategy	The policy wording expects proposals to support the delivery of the national and local Nature Recovery Strategy rather than enforcing compliance. Retain as justified.

DS05(4)	Infrastructure Delivery Plan.	Developer contributions required for infrastructure “as identified in the Infrastructure Delivery Plan”	Main Modification. Amend text to read: “As part of a package or combination of infrastructure delivery measures, it is likely that developer contributions will be required for development proposals to ensure that development is supported by infrastructure. Developers will be expected to either provide direct provision or contribute towards the provision of local and strategic infrastructure to meet the needs from the development alone, or cumulatively with other developments as identified in in having regard to the Infrastructure Delivery Plan.”
SA01 - S2(4), GB1(1), GB2(8), HH1(2), HH2(2), HB1(5), U2(2), MP2(9), SA04(f)	Leicestershire Minerals and Waste Local Plan.	A minerals assessment must accompany proposals in accordance with Policy M11 of the Minerals and Waste Local Plan	The policy requirement is justified as it involves compliance with an adopted Development Plan Document. Retain as justified.
SA02(2)	Infrastructure Delivery Plan.	Infrastructure set out in the Infrastructure Delivery Plan “must be implemented...”	Main Modification. Amend text to read: “Infrastructure, as set out in the Infrastructure Delivery Plan, must be implemented alongside

			development in accordance with a Phasing Strategy approved by the Councils, having regard to the Infrastructure Delivery Plan ”
SA02(6)(e)	DFE standards	Applicants should produce a strategy, in conjunction with County Council, which considers options for meeting the need for education, including the provision of new schools “meeting DFE standards”	DFE standards are national requirements. Retain as justified.
SA02(12)	Infrastructure Delivery Plan	Supported by a masterplan that identifies key infrastructure “in accordance with the Infrastructure Delivery Plan”	Main Modification. Amend text to read: “...masterplan which addresses the policy requirements set out above and clearly identifies the phases of development, and the location and timing of the provision of all key infrastructure in accordance with the Infrastructure Delivery Plan within and beyond the plan period having regard to the Infrastructure Delivery Plan. ”
SA03(3)(i)	Infrastructure Delivery Plan	Provide healthcare infrastructure “as identified in the Infrastructure Delivery Plan”	Main Modification. Amend text to read: “Provide infrastructure as identified in the Infrastructure Delivery Plan for primary health care provision facilities having

			regard to the Infrastructure Delivery Plan...
HN01(c)	Housing Needs Assessment	Affordable housing mix “will be informed by the latest housing needs assessment”	The policy wording expects development proposals to be informed by the latest housing needs evidence rather than enforcing compliance. Retain as justified.
HN02(1)	Council Housing Need Evidence	Housing mix “should take into account the latest evidence on housing needs... published by the Council”	The policy wording expects development proposals to take into account the latest housing needs evidence rather than enforcing compliance. Retain as justified.
HN06(4)(d)	Current Good Practice Guidance	Development of new sites conforms to current good practice guidelines	Main Modification. Amend text to read: “the site conforms has regard to current good practice guidelines”
DM05(1)(a)	Open Spaces Strategy and Green and Blue Infrastructure Study	Development must contribute to creating green and blue infrastructure “in accordance with the Open Spaces Strategy... and Green and Blue Infrastructure Study...”	Main Modification. Amend text to read: “contribute to creating high-quality multifunctional green and blue infrastructure, having regard to in accordance with the Open Spaces Strategy 2021 (or subsequent revisions) and Green and Blue Infrastructure Study (2024) ...”
DM05(2)	Playing Pitch Strategy and Open Spaces Strategy	Residential development of 10 or more homes will meet local standards, including Outdoor Sports in accordance	The audit of open space is evolving, and the council is currently working on an update to the Open Space Strategy 2021 [GR-NLP 1] , therefore, the ability to

		with Playing Pitch Strategy and Cemetery and burial grounds in accordance with Open Spaces Strategy	review the standards outside the plan is beneficial in order to maximise the district's ability to secure necessary provision and keep the standards up to date. Retain as justified.
DM06(1)(b)	Highway Authority Guidance and Standards	Safe access provided "having regard to Highway Authority guidance and standards"	The policy wording expects development proposals to have regard to highway guidance and standards rather than enforcing compliance. Retain as justified.
DM10(1)	Natural England's Biodiversity Metric	Biodiversity net gain "should be calculated using Natural England's Biodiversity Metric"	References to the official statutory biodiversity metric. Retain as justified.
DM13(3)(b)	2009 Unilateral Undertaking, and associated Operational Plan	Development within the area of the Proving Ground will be supported where the proposed use is for an authorized use or associated with the operation of the site by vehicles for corporate entertainment, "in accordance with the 2009 unilateral undertaking... and under terms of the associated Operational Plan"	These are site-specific agreements specific to the airfield's operation. Retain as justified.
DM13(3)(c)	Noise Management Plan and 2009 Unilateral Undertaking	Development within the area of the Proving Ground will conform to the Noise Management	These are site-specific agreements specific to the airfield's operation. Retain as justified.

		Plan and 2009 unilateral undertaking	
DM13(6)(a)	Airfield Safety Requirements	Development within the complex to the North of Gartree Road must not conflict with “safety requirements of existing uses at the airfield”	These are site-specific agreements specific to the airfield’s operation. Retain as justified.
DM16(c)	International Commission on Non-Ionizing Radiation Protection	Masts must be “self-certified to meet ICNIRP standards”	References to statutory international public health protection standards. Retain as justified.
Schedule of Proposed Modifications to the Submission Plan [S-NLP 15]			
DS05(7)	Leicestershire Local Transport Plan 4, Enabling Travel Choice Strategy, Multi-Modal Area Investment Plans	Transport assessments must follow a vision-led approach “having regard to relevant policies and strategies.... such as Local Transport Plan 4...”	The policy wording expects development proposals to have regard to relevant policies and strategies rather than enforcing compliance. Retain as justified.
SA01(4)	Leicestershire Enabling Travel Choice Strategy	Transport assessments “should have regard to the Leicestershire Enabling Travel Choice Strategy”	The policy wording expects development proposals to have regard to the Leicestershire Enabling Travel Choice Strategy rather than enforcing compliance. Retain as justified.

Q13 Could the Council confirm that the relevant 15-year period from adoption would be 31 March 2043?

Yes. If the Local Plan is adopted between 1 April 2027 and 31 March 2028, the relevant 15-year period would be 31 March 2043.

Should the Plan be adopted by 31 March 2027, the relevant 15-year period would be 31 March 2042.

Q14 Why would strategic policies that look ahead from 2020 be consistent with national policy that expects plans to be up to date?

Strategic Policies covering a plan period from 2020 are consistent with national policy. NPPF23 Paragraph 31 requires all policies to be underpinned by relevant and up to date evidence. The Housing & Economic Needs Assessment (2022) (HENA) [[HSG-NLP 2](#)], Housing Distribution Paper (2022) [[HSG-NLP 3](#)] and Leicester & Leicestershire Statement of Common Ground on Housing and Employment Need (2022) (L&L SoCG) [[SCG-NLP 3](#)] provide up to date evidence and agreement on HMA-wide housing distribution and unmet need for NPPF23 plans. This evidence covers the period from 2020 to align with Leicester City and a substantial unmet need of 18,700 homes in their area by Leicester City Council from 2020 to 2036 (under the NPPF23 standard method). The Draft Submission Harborough Local Plan seeks to be consistent with this up-to-date evidence.

The [Leicester Local Plan 2020 to 2036 \(adopted June 2026\)](#) has very recently been adopted with a 2020 base date consistent with the HMA-wide evidence above and National Policy. The [Charnwood Local Plan 2021 – 2037 \(adopted Jan 2026\)](#) is also based on the same HMA-wide evidence (Note: the HMA-wide evidence took the 2021 base of Charnwood’s plan into account, as it had already been submitted at the time the work was carried out).

Q15 Could the Council provide a schedule amended in the following ways:

- **Delete reference to ‘minor modification’ in favour of AM;**
- **Separate out MMs, AMs, and changes to the policies map;**
- **Change those suggested changes that we consider should MMs. These are highlighted in yellow in the attached Annex 2; and**
- **Number each MM/AM (MM1, MM2, MM3), allocating one MM per policy/or part of the Plan e.g. the Introduction.**

An amended schedule of modifications is attached at Appendix 1, as requested. This amended schedule does not currently include modifications resulting from the Council’s response to question 12 above. These can, of course be added as required.

Q16 Could the Council clarify the year of the latest calculation of LHN on which the Plan relies?

The LHN on which the plan relies was calculated in June 2022 resulting in an LHN of 534 homes per year. The baseline is calculated using the 10-year period from 2022 and the affordability adjustment is based on the 2020/21 affordability ratio (published in March 2022). The calculation for each authority in the HMA is set out from page 130 in the HENA [[HSG-NLP 2](#)]. This calculation provides the basis for the submitted draft local plan ensuring it aligns with the HENA; the Housing Distribution Paper (2022) [[HSG-NLP 3](#)]; L&L SoCG on Housing and Employment [[SCG-NLP 3](#)]. Two recently adopted plans in the HMA (Charnwood and Leicester City) are also consistent with this evidence. At the point the Submission Draft Harborough Local Plan was submitted (April 2026), the NPPF23 LHN for the District was 489 homes per year (i.e. 45 homes per year lower than the 534 LHN the plan is based on).

Q17 Does the latest calculation of LHN align with the Plan’s housing requirement period?

No. The LHN was calculated in June 2022, and the plan has a housing requirement base date of 2020. This approach is consistent with the HENA [[HSG-NLP 2](#)], Housing Distribution Paper) [[HSG-NLP 3](#)] and L&L SoCG on Housing and Employment [[SCG-NLP 3](#)], which formed the basis of the housing requirement in the Harborough plan and the recently adopted Charnwood Local Plan and Leicester Local Plan.

Q18 The Plan’s housing requirement is not set as a minimum. To accord with NPPF23 paragraph 60, which sets out the Government’s objective of significantly boosting the supply of homes, should it be set as a minimum?

The housing requirement meets local housing need and contributes to meeting unmet need from Leicester City. It is not currently expressed as a minimum figure, but could be, if considered necessary for soundness.

Q19 Did the Council, including through sustainability appraisal, consider an increase in the total housing figures in the Plan to (a) help deliver the required number of affordable homes or (b) reflect growth ambitions linked to economic development or infrastructure investment?

Yes, an increase in the total housing figure was considered, including through the Sustainability Appraisal. The Development Strategy Paper (Feb 2025) [[PRE-NLP 4](#)] explains three scales of growth (Low, Medium & High) were considered and tested through the SA process. These options, including the 'High' growth option of 934 homes per year was appraised against the SA objectives, which include affordable housing, economic growth and infrastructure considerations.

The Development Strategy Paper [[PRE-NLP 4](#)] explains how affordable housing, economic development and infrastructure investment were considered, and why the preferred level of housing growth was selected taking into account these considerations. The sections on 'The Scale of Housing' (pages 4-7 and 13-17) of [PRE-NLP 4](#) are the most relevant.

Q20 (a) Does the Plan allocate every site that the Council considers to be suitable and available for housing development? (b) Do any representations made under regulation 20 suggest that there are sites that are suitable and available which are not allocated? (c) If so, why does the Council consider them not to be?

(a) No. The Strategic Housing and Economic Land Availability Assessment Update (SHELAA 2024) [[HSG-NLP 4-6](#)] assessed 301 potential housing and employment sites against the three key tests of availability, suitability and achievability in accordance with relevant Planning Practice Guidance. The majority were assessed as being (to varying degrees) suitable and available. Figure 4 shows that 14.29% of the sites assessed were categorised as 'deliverable', 84.72% as 'developable', and the remainder as 'not currently developable'.

(b) Yes. As set out in Table 7 of the Regulation 22 Consultation Statement [[S-NLP 10](#)], a number of representations were submitted by landowners and developers suggesting sites for development, either as an alternative to those allocated or in addition. Some of these Regulation 20 representations argued that their respective sites are suitable and available.

(c) The Site Selection Methodology [[PRE-NLP 5](#)] and the addenda to this [[PRE-NLP 6](#)] set out and justify why the proposed allocations have been selected and others rejected. Reasons for non-allocation typically include the relationship with the existing built form of the settlement, impact on coalescence and the scale in terms of the development strategy.

Q21 Based on the latest comprehensive housing land supply information (31 March 2025) [SNLP15], what is the identified supply of specific, deliverable sites for the period 1 April 2028 to 31 March 2033 in the following categories:

- **Sites with detailed planning permission.***
- **Sites with outline planning permission for fewer than 10 homes.***
- **Sites with outline planning permission for 10 or more homes.****
- **Sites with a grant of permission in principle.****
- **Allocations in the Plan that do not fall into any of the above categories.****
- **Windfalls (if applicable)**

*** These sites should be considered “deliverable” until permission expires unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer demand for the types of units, or sites have long term phasing plans).**

**** These sites should only be considered “deliverable” where there is clear evidence that housing completions will begin on site within five years.**

Appendix 2 sets out the supply of specific deliverable sites (by the above categories) from 1 April 2028 to 31 March 2033.

Q22 Could the Council provide a Table listing all of the sites that are assumed to contribute to the five year supply between 1 April 2028 and 31 March 2033 in each of the above categories with the number of homes expected to be completed on each site in each year of that period?

Appendix 2 sets out the supply of specific deliverable sites (1st April 2028 to 31st March 2033) with the number of homes expected to be completed each year.

Q23 Could the Council summarise the housing land supply evidence that informs the latest housing trajectory using the template attached in the Annex 1 to this note for:

- **Every allocation included in the Plan that proposes residential development**
- **All sites that are not allocations in the Plan but are assumed to contribute towards the five-year supply from 1 April 2028?**

Appendix 3 sets out site templates for every housing allocation in the Plan. Appendix 4 provides site templates for every major housing site (10 or more dwellings) that contributes to the 5-year supply from 1st April 2028 (not including site allocations). A summary table for minor sites (fewer than 10 dwellings) contributing to the 5-year supply from 1st April 2028 can be prepared, as necessary.