

**Harborough District Council Response to Panel Note 3: Preliminary Questions
(dated 16 June 2026)**

19 June 2026

The Council thanks the Panel for the question contained within Panel Note 3, dated 16 June 2026.

The question relates to NPPF 2024 paragraph 234(a) and seeks further clarification of how the requirements of this paragraph are met in relation to the transition arrangements, in light of issues raised by objectors:

3. The Council addresses this matter in its Housing Topic Paper [TPCNLP7]. That sets out in brief why the Council considers the Plan meets the requirements of NPPF 2024 paragraph 234(a) and therefore should be examined against the December 2023 NPPF. In response to our Panel Note 1 [ID1], the Council also confirms its calculation of Local Housing Need (LHN) in accordance with footnote 83 of NPPF 2024.

4. However, that evidence does not address the matters raised by a number of objectors. Those address that such a calculation is based on a draft housing requirement that includes a contribution to unmet need, that it should not include any unmet need, and without the contribution to unmet need, the Plan's draft housing requirement would not meet 80% of LHN calculated in Harborough Local Plan (March 2025) Examination Preliminary Questions accordance with footnote 83 of NPPF 2024. The nub of objectors' concern is that they consider the Plan therefore does not meet the requirements of NPPF 2024 paragraph 234(a).

NPPF 2024 paragraph 234(a) states:

234. For the purpose of preparing local plans, the policies in this version of the Framework will apply from 12 March 2025 other than where one or more of the following apply:

*a. the plan has reached Regulation 19⁸² (pre-submission stage) on or before 12 March 2025, and its **draft housing requirement meets at least 80% of local housing need⁸³; [my emphasis]***

⁸² Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. In this context "reached Regulation 19" refers to when Regulation 19 has been complied with (i.e. when the planning authority has made a copy of each of the proposed submission documents and a statement of the representations procedure available, and the statements required in Regulation 19(b) have been sent to consultation bodies).

⁸³ Calculated using the standard method in national planning practice guidance, published on 12 December 2024.

Compliance with each of the requirements set out in NPPF 2024 para 234(a) is examined below:

- ***The plan has reached Regulation 19⁸² (pre-submission stage) on or before 12 March 2025***

Harborough's Regulation 19 consultation was published on 10 March 2025, before the 12 March 2025 deadline.

Objectors have not questioned the Council's position that this requirement has been met.

- ***Its draft housing requirement meets at least 80% of local housing need⁸³***

To assess compliance, a comparison must be made between the draft housing requirement set out in the Plan and the local housing need calculated using the standard method in national planning practice guidance, published on 12 December 2024.

The requirement is met if the housing requirement is at least 80% of the local housing need (LHN).

18 representations are made in relation to this requirement and are set at Appendix 1.

The key issues raised are:

1. Without Harborough's contribution to meeting Leicester's unmet need, Policy DS01 would not achieve 80% of the updated LHN figure [ID 12780, 12822, 12961, 13006, 13480, 13593, 13852, 13919]
2. Policy DS01 only achieves 80% due to the uplift to meet Leicester's unmet needs and this should be in addition to the LHN [ID12991,13593, 13724, 13745, 13777, 13827]
3. The annual housing requirement exceeds 80% of the updated LHN only in the first 16 years of the plan period [13187, 13829]
4. The Plan meets the transitional requirements set out in NPPF 2024 para 234(a) [12991, 13036]

In relation to points 1, 2 and 3, the key point of difference between the objectors' issues and the Council's position relates to the calculation of housing requirement.

In asserting that Policy DS01 does not meet 80% of the local housing need, objectors seek to discount provision made for Leicester's unmet need (ie the 123 dwellings per annum 2020 – 2036) from the calculation of housing requirement.

Objectors then use the resultant figure of 534 dpa (representing Harborough's LHN under the previous standard method) to compare with the LHN under the new standard method of 723 dpa. This calculation results in a figure of 73.8%.

The reason stated for seeking to exclude the contribution to meeting Leicester's unmet need figures from the housing requirement is that were the contribution of 123 dpa included, it would result in Harborough failing to meet its contribution of 123 dpa set out in the Leicester & Leicestershire SoCG 2022 [SCG-NLP 3]. This point is not accepted. The Plan makes provision for 1,968 dwellings (123 X 16 years) to contribute towards Leicester's unmet need. This figure forms part of the housing requirement set out in Policy DS01, in accordance with NPPF 2024 para 69.

NPPF 2024 para 234(a) does not require a comparison between LHN resulting from the previous standard method and LHN resulting from the current standard method. It requires a comparison between the Plan's **housing requirement** and the new standard method LHN.

Housing requirement

NPPF 2023 para 67 (and NPPF 2024 para 69) explains how the housing requirement is calculated:

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. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.

As such, para 67 clarifies that the housing requirement may be higher than local housing need, since it is the sum of: local housing need; any provision made for unmet need from neighbouring areas; and any uplift arising from economic development. There is therefore no basis for seeking to exclude Harborough's contribution to meeting Leicester's unmet need from the calculation of the Plan's housing requirement.

In accordance with para 67, the housing requirement set out in Policy DS01 comprises local housing need for the district plus a proportionate share of unmet need from neighbouring Leicester City. The total housing requirement for the plan period is set out in Table 1.

Table 1: Housing Requirement Calculation – Harborough District (2020–2041)

Column	Component	Dwellings
A	Local Housing Need (534 dpa × 21 years, 2020–2041)	11,214

Column	Component	Dwellings
B	Unmet Need from Leicester City (123 dpa × 16 years, 2020–2036, per SoCG 2022)	1,968
C	Total Housing Requirement (A + B)	13,182
D	Average annual housing requirement (C/21)	628 dpa

Local housing need

Local housing need, calculated in accordance with NPPF 2024 para 234 footnote 83 is 723 dpa at December 2024 (as set out in HDC response to Panel Note 1).

Comparison between requirement and LHN

NPPF 2024 para 234(a) requires a comparison to be made between the housing requirement and updated LHN. The requirement is met if the housing requirement is at least 80% of the local housing need.

Policy DS01 sets a housing requirement of 13,182 over a 21 year plan period (2020-41) which equates to an average of 628 dpa. This is 87% of the updated LHN of 723 dpa when the NPPF 2024 was published. The calculation is set out below:

$$(628/723)*100 = 86.86\% \text{ (rounded to 87\%)}$$

For comparison purposes, the calculation may also be set out in relation to total plan period figures. The total housing requirement of 13,182 dwellings is 87% of the total updated LHN of 15,183 over a 21 year period. The calculation is set out below:

$$(13,182/15,183)*100 = 86.8\% \text{ (rounded to 87\%)}$$

Conclusion

The Plan was published in accordance with Regulation 19, prior to the transitional arrangement deadline of 12 March 2025. The Plan's housing requirement is above 80% of the updated LHN.

As such, the requirements of NPPF 2024 para 234 (a) are met.