

Subject: Harborough Local Plan 2020-2041 Examination – Stage 1
Matters, Issues and Questions
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Harborough Local Plan 2040-2041 Examination Hearing Statement – Stage 1 Matters, Issues and Questions On Behalf of Taylor Wimpey Strategic Land

Stage 1 Matters, Issues and Questions

Does the Plan meet the requirements of NPPF 2024 paragraph 234(a)?

1. The Plan's draft housing requirement 2020-2041 includes a contribution to Leicester's unmet need. In so doing, would it accord with NPPF 2024 paragraph 234(a)?

'Policy DS01 Development Strategy: Delivering Homes' sets out that the housing requirement over the plan period is 13,182 between 2020 and 2041; this is identified by an annual housing requirement of 657 homes per year between 2020 and 2036, and 534 homes per year between 2036 and 2041. The Council state that the increase by 123 homes per year between 2020 and 2036 is to help meet Leicester's unmet housing need as agreed by the Leicester and Leicestershire Authorities Statement of Common Ground (SoCG).

Paragraph 234 of the NPPF published December 2024 (amended February 2025) states *"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."

Footnote 83 states *"Calculated using the standard method in national planning practice guidance, published 12 December 2024."*

Our position is that there are several issues with the Plan's draft housing requirement 2020-2041 in the context of NPPF 2024 Paragraph 234(a), as set out below under points 1–4.

1. Harborough District Council published the Proposed Submission Draft (Regulation 19 consultation document) on 10th March 2025, so benefit from the transitional arrangements set out in Annex 1 of the NPPF (December 2024) which means that the Local Plan can proceed under the previous iteration of the NPPF (December 2023) provided that it meets at least 80% of the local housing need established calculated using the Standard Method set out in the Planning Practice Guidance (December 2024).

At the time of publication of the Regulation 19 consultation document, the Standard Method generated a Local Housing Need (LHN) for Harborough of 723 dwellings per year (based on the latest affordability ratio data at the time of publication). It can be calculated that 80% of this requirement equates to 579 dwellings per annum, which is above the level of need that has been planned for in the Harborough Local Plan. This is clarified at Paragraph 4.6 of the Local Plan which confirmed that the starting point for Harborough's LHN was 534 homes per year.

Whilst we note that an allowance for Leicester's unmet need (123 dwellings – discussed further below) takes the annual requirement for years 2020 to 2036 above 80% of the LHN, this is only on the basis of the Local Plan contributing to meeting additional needs of Leicester. It is our position that this should not be factored into consideration of whether the Harborough Local Plan is meeting 80% of Harborough's LHN.

On the basis that the Local Plan does not meet 80% of the LHN for Harborough, the Local Plan does not accord with NPPF 2024 Paragraph 234(a). It should also be noted that NPPF 2024 Paragraph 61 requires the overall aim should be to meet an area's identified housing need – the Local Plan clearly does not comply with this policy requirement.

2. The NPPF 2024 Paragraph 62 establishes that the minimum number of homes needed in an area should be informed by a Local Housing Need Assessment, conducted using the Standard Method. This requirement has not changed from the NPPF (December 2023). NPPF 2024 Paragraph 69 goes on to state that the housing requirement may be higher than the identified need, citing examples of unmet need or growth ambitions as justification for a higher figure.

We set out in our response to the Regulation 19 consultation document that the HENA (2020) highlights that the affordable housing need in the area should be a consideration in setting the housing requirement. This accords with the Planning Practice Guidance (Reference ID: 2a-024-20190220) where it states '*an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes*'.

Despite this, and the HENA identifying that there is a significant affordable need in the area, it is unclear how the potential need to plan for additional housing over and above the minimum housing need has been considered. It is our position that this is an oversight and there is a need to revisit the housing requirement to assess if it should be increased to facilitate the delivery of a greater level of affordable housing.

At the same time, it is considered that the HENA needs to be revisited more generally to bring it up-to-date with the latest LHN Standard Method, which should underpin the assessment, as required by NPPF 2024 Paragraph 62, noted above.

3. The Local Plan sets out that the agreement between the Leicestershire authorities means that the Harborough Local Plan is required to deliver 123 dwellings per annum over the period 2020 to 2036. This is based on an overall shortfall in Leicester City of 18,300 dwellings over the same period, which equates to 1,169 dwellings per year. The contribution HDC are making therefore equates to c.10.5% of the overall unmet need.

This figure has been maintained in the Local Plan despite a significant reduction in Leicester's unmet need as a result of the changes to the Standard Method, which reduced the LNH for Leicester City from 2,435 to 1,157. This reduction means that there will inevitably be a reduction in the level of unmet need to be accommodated in adjoining authorities (we estimate to c.291 dwelling per year).

Despite this change being known in December 2024, the Local Plan has progressed based on the agreement of Harborough District Council to accommodate 123 dwellings per year. Whilst this approach means that the Local Plan is likely to currently over allocate land to meet the revised unmet need of Leicester, until the calculation has been re-run and an appropriate apportionment of this need attributed to Harborough, it cannot be said that the Local Plan is effective or that the Duty to Co-Operate is satisfied.

A simple reduction based on the same 10.5% contribution of Harborough would mean that the Local Plan should be contributing 31 dwellings per year to Leicester's unmet need. However, this is an over-simplification of the process which, as clarified at paragraph 3.22 of the Statement of Common Ground (July 2022) is based on the functional relationship of each District/Borough with Leicester City, the balance of jobs and homes in each District/Borough, and deliverability of the distribution of development.

Our position is that if the exercise is revisited, the proportion of the unmet need from Leicester City that Harborough should contribute is likely to increase, based on the functional relationship of Harborough with Leicester and the deliverability of development. Whilst this may still lead to a reduction in the 123-dwelling allowance for Leicester's unmet need as currently planned for, ensuring that a proper understanding of this matter is key to the overall effectiveness of plan-making across Leicestershire and this should have been done under the Duty to Cooperate.

This is also a key factor as it may have a direct bearing on whether the 80% requirement noted under point 1 above, has been satisfied. It is also important as the spatial strategy and the allocation of sites has been, in part, driven by the need to meet Leicester's unmet need. If this figures changes, it has an impact on the distribution of development.

Adding to this point, it is also worth noting that the LHN of other Leicestershire authorities has also changed. This includes the neighbouring Oadby and Wigston whose LHN has increased to 388 dwellings per year (as of April 2026 – 2026/27 based on 2025 affordability ratios). This is an increase of 148 dwellings per year above the figure of 240 dwellings per year provisions that Oadby and Wigston Borough Council have published as part of the Borough of Oadby and Wigston Local Plan (2025-2042), which was submitted to the Secretary of State for Examination on 12th June 2026. Based on Oadby and Wigston Borough Council current position, it is likely that there will be limited capacity for Oadby and Wigston to deliver additional need against its current LHN figure and, therefore, are likely to also declare an unmet need in addition to Leicester City.

Overall, across the Leicester and Leicestershire Authorities, the combined LHN goes up to 5,935 dwellings per year (as of April 2026 – 2026/27 based on 2025 affordability ratios) from the 5,713 figure that formed the basis of the Statement of Common Ground between Leicester and Leicestershire Authorities back in 2022. This is a further 3.88% increase in housing need across the Leicestershire area which will need to be catered for across Local Plans.

To reiterate the point made above, these revised figures have been known to Harborough District Council since December 2024 and created a new set of issues that the Council's should have been working together to resolve through the Duty to Co-operate. Whilst the current housing requirement in the Harborough Local Plan is likely to over-provide for Leicester's unmet need (identified by the 123 additional homes per annum in the Local Plan), it is actually likely to be the case that overall, the Harborough Local Plan does not provide sufficient additional homes to meet the overall needs of Leicester and Leicestershire as a whole. This is specifically a concern given the unmet housing need arising from Oadby and Wigston which adjoins Harbough District and, if considered properly, would alter the spatial strategy and the allocation of sites to meet need close to where it arises.

4. With regards to the plan period, the NPPF 2024 sets out that there is a requirement for a Local Plan to cover a 15-year plan period from adoption. The Council had anticipated adoption of the Local Plan by December 2026 as published in the Local Development Scheme (LDS) (November 2025). However, for the Local Plan to cover a 15-year period from adoption, it would have had to be adopted by the end of March 2026. Given the current timescales, the Local Plan will not have a 15-year plan period as required, based on the housing trajectory being based on the 'normal' monitoring period of 1st April to 31st March (Local Plan, Appendix 5). We suggest that the Local Plan cannot be found sound unless the plan period is extended and additional housing sites are identified as required.

2. Excluding the contribution to Leicester's unmet need, the Plan's draft housing requirement would meet 74% of LHN calculated in accordance with footnote 83 of NPPF 2024. If the Panel were to agree with this approach to assessing whether the Plan meets the requirements of NPPF 2024 paragraph 234(a), what, if any, is the implication of this for the Examination?

Our position is that we do not agree with the Council's approach to meeting the requirements of NPPF 2024 Paragraph 234(a). The implications of this for the Examination are that the housing requirement in the Local Plan is unsound as it fails to delivery at least 80% of the LHN established using the Standard Method. As such, the housing requirement needs to be revised to provide a minimum of 747 dwellings per year (LHN as of April 2026 – 2026/27 based on 2025 affordability ratios), plus any allowance to meet Leicester's unmet need, plus the unmet need which has now emerged from Oadby and Wigston.

The need to deliver affordable housing has not been factored into the housing requirement. This should drive up the overall housing requirement to enable as much of the affordable housing need to be realised as possible and make the Local Plan effective.

The level of unmet need for Leicester City and from Oadby and Wigston needs to be revisited, given the changes to the LHN Standard Method. This should now be taken into consideration as part of the Examination of the Local Plan as it has potential impacts on a) consideration of whether the 80% of LHN threshold has been met and b) the overall development strategy, which is influenced by meeting unmet need from Leicester City and from Oadby and Wigston.

A further implication to this Examination is that the plan period will not be 15 years for adoption and, therefore, needs to be extended. The Local Plan cannot be found sound unless additional housing sites are identified as required.

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