



The Planning
Inspectorate

Report to Harborough District Council

by Kevin Ward BA (Hons) MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 1 November 2011

PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

**REPORT ON THE EXAMINATION INTO THE HARBOROUGH CORE STRATEGY
DEVELOPMENT PLAN DOCUMENT**

Document submitted for examination on 21 April 2011

Examination hearings held between 19 and 28 July 2011

File Ref: PINS/F2415/429/1

Abbreviations Used in this Report

AA	Appropriate Assessment
DPD	Development Plan Document
EMSDS	East Midlands Strategic Distribution Study
HMA	Housing Market Area
LDS	Local Development Scheme
NPPF	National Planning Policy Framework
PPS	Planning Policy Statement
PUA	Principal Urban Area
RS	Regional Strategy
SA	Sustainability Appraisal
SC	Suggested Change
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SDA	Strategic Development Area
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment

Non-Technical Summary

This report concludes that the Harborough Core Strategy Development Plan Document provides an appropriate basis for the planning of the District. The Council has sufficient evidence to support the strategy and can show that it has a reasonable chance of being delivered.

A limited number of changes are needed to meet legal and statutory requirements. These can be summarised as follows:

- Extend the plan period to 2028 to ensure a time horizon of at least 15 years from adoption and to provide an adequate basis for the Allocations DPD;
- Roll forward the housing provision figures accordingly, clarify the strategy for the distribution of housing over the whole plan period (2006-2028) and make clear that this provision is regarded as a minimum;
- Clarify the definition of the Leicester Principal Urban Area and increase overall housing provision in this area by a modest amount to conform with the RS;
- Clarify the approach to Limits to Development, Green Wedges, Areas of Separation and previously developed land;
- Give greater emphasis to enhancing services and facilities in Broughton Astley to reflect its status as a Key Centre and clarify the distinction between Rural Centres and other villages in meeting development needs; and
- Amend the wording of a number of policies to ensure that they are effective by providing necessary clarity and/or flexibility, that they reflect up to date evidence, are consistent with national policy and are genuinely strategic.

All of the changes recommended in this report are based on proposals put forward by the Council in response to points raised and suggestions discussed during the public examination. The changes do not alter the thrust of the Council's overall strategy.

Introduction

1. This report contains my assessment of the Harborough Core Strategy Development Plan Document (the Core Strategy) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004. It considers whether the Core Strategy is compliant in legal terms and whether it is sound. Planning Policy Statement (PPS) 12 (paragraphs 4.51-4.52) makes clear that to be sound, a Development Plan Document (DPD) should be justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the Council has submitted what it considers to be a sound plan. The basis for my examination is the submitted Core Strategy (April 2011) which is the same as the document published for consultation in October 2010.
3. My report deals with the changes that are needed to make the Core Strategy sound. They are identified in bold in the report (**SC**) and are set out in Appendix A. All of these changes have been suggested by the Council during the course of the examination. None of the changes materially alter the substance of the plan and its policies. They have been subject to consultation and Sustainability Appraisal (SA) and I have taken account of consultation responses and the findings of the SA in writing this report.
4. The Council also wishes to make a number of minor changes to the submitted Core Strategy in order to clarify, correct and update various parts of the text. Although these changes do not relate to soundness, I endorse the Council's view that they improve the plan. These changes are set out in Appendix B. I similarly endorse the correction of any minor typographical, grammatical or formatting errors provided that they do not alter the substance or meaning of the text.

Assessment of Soundness

Preamble

5. The Government announced the revocation of Regional Strategies with immediate effect on 6 July 2010. The submitted Core Strategy was therefore prepared on the basis that the East Midlands Regional Plan (the RS) no longer formed part of the development plan and little reference was made to it. The decision to revoke Regional Strategies was subsequently quashed and the RS currently forms part of the development plan. The Core Strategy must be in general conformity with the RS.
6. The Council's suggested changes (**SC0.2, SC2.1 and SC2.4**) are necessary to clarify the situation regarding the RS and the strategic context it provides for the Core Strategy. I am satisfied that subject to the Council's suggested change relating to the provision of housing in the Leicester Urban Fringe/Principal Urban Area (**SC2.3**), the Core Strategy is in general conformity with the RS. This matter is discussed in more detail later in the report.
7. The Ministerial Statement "Planning for Growth" was issued on 23 March 2011. The Council and other interested parties were given the opportunity to comment on the potential implications of the Statement for the Core Strategy. The Draft National Planning Policy Framework (NPPF) was published for consultation on 25 July 2011. Again the Council and others have been given the opportunity to comment on its implications for the Core Strategy. In addition both the Planning for Growth Statement and the Draft NPPF were referred to on numerous occasions by participants during the hearing sessions.
8. I have taken account of both documents and the comments received in reaching my conclusions on matters of soundness and recommending changes. However, in the case of the Draft NPPF, whilst it is a clear statement of the Government's intended policies, little weight can be afforded to it as it is yet to be finalised following consultation.

Main Issues

9. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified seven main issues upon which the soundness of the plan depends. Given the degree of overlap between the issues, it assisted the discussion at the hearing sessions to deal with the distribution of housing across the District alongside the Spatial Strategy and to deal with the policies for places at early hearing sessions. This report sets out the issues in the order which they were discussed. However for ease of reference, matters relating to Policies 1 and 2 are dealt with as separate issues.
10. In many cases I identify a lack of sufficient clarity in terms of the meaning or implementation of policies which results in the Core Strategy not being effective.

Issue 1 – Whether the Spatial Strategy and the approach to the overall provision of housing set out in Policy 1 is justified, effective and consistent with national policy

The plan period

11. PPS12 makes it clear that the time horizon for a core strategy should be at least 15 years from the date of adoption. PPS3 emphasises the need to set out policies and strategies to enable continuous delivery of housing for at least 15 years from adoption. The Council accepts that given the timeframe of the submitted Core Strategy (up to the end of March 2026), this would not be the case. The Core Strategy will also need to provide the strategic context for the Allocations DPD which is not expected to be adopted until 2013. The submitted Core Strategy is not therefore consistent with national policy in this respect.
12. In order to give at least a 15 year timeframe and to provide sufficient guidance for site allocations and a continuous delivery of housing over that time, the plan period for the Core Strategy would need to be extended to 2028. This would however take it beyond the timeframe of the RS which in terms of housing provision covers 2006-2026.
13. It is expected that the Core Strategy would be reviewed well before 2026. Furthermore, in terms of housing, the Allocations DPD would not necessarily have to identify specific sites for the last five years of the plan period; giving an element of flexibility should the housing provision be amended following a review of the Core Strategy. Taking these factors into account I consider that the benefits of having an adopted Core Strategy in place looking ahead at least 15 years outweigh the lack of specific guidance on housing requirements beyond 2026.

Overall provision for housing in the District

14. Policy 1 makes provision for 7,000 additional dwellings across the District between 2006 and 2026 (an average of 350 per annum). This is consistent with Policy 13a of the RS. In advance of any detailed consideration of the implications of the latest household projections and collaborative work between neighbouring authorities, there is no sound basis for departing from the housing provision set out in the RS.
15. Harborough has a strong housing market and interest in development has remained high even in recent years when economic conditions have been difficult. There is no evidence of any significant non-implementation of allocations or planning permissions for housing. Although it may be appropriate to make a relatively modest allowance for non-implementation, this is a matter for the Allocations DPD, taking into account detailed information available at the time.
16. The Council regard the reference to 7,000 dwellings as a figure to be planned for rather than a maximum. It is important to provide a reasonable degree of certainty and a clear strategic framework for future site allocations. At the same time it is also important to take a flexible and positive approach and be clear that the Core Strategy does not impose a ceiling on the amount of housing development that may come forward.

17. In terms of an extended plan period to 2028, the pragmatic approach would be to roll forward the RS annual provision for the District by two years giving an overall provision between 2006 and 2028 of 7,700 additional dwellings.

The settlement hierarchy

18. Market Harborough is by some way the largest settlement in the District and possesses the widest range of services and facilities. It has relatively good public transport links compared with other parts of the District. As the principal town within the District, Policy 1 seeks to develop the role of Market Harborough as the main focus for additional development. This approach is justified and consistent with the RS which identifies the town as a sub-regional centre.
19. In terms of the RS, Harborough is within the Three Cities Sub-Region (Leicester, Nottingham and Derby) and forms part of the Leicester and Leicestershire Housing Market Area (HMA). Within the HMA the RS seeks to focus development on the Leicester Principal Urban Area (PUA). Policy Three Cities SRS 1 of the RS defines the PUA as including the built up parts of the settlements of Scraptoft, Thurnby and Bushby in Harborough. It also includes the built up area of Oadby which is in Oadby and Wigston District but adjoins the boundary with Harborough. The RS recognises that some urban extensions will be needed to accommodate the planned level of development but makes it clear that the best opportunities for sustainable urban extensions lie to the north and west of Leicester and that such extensions to the PUA in Harborough or Oadby and Wigston would be difficult without sustained and significant investment in transport infrastructure.
20. The Council has considered options in terms of the approach to accommodating development in and adjoining the PUA. In October 2009 the "Towards a Final Draft" document included a proposal for a strategic development area along the A6 between Great Glen and Oadby. It was envisaged that this would accommodate approximately 900 dwellings and would be large enough to sustain frequent public transport services, a primary school and local retail facilities.
21. At the time this proposal was based on the assumption that some 3,700 additional dwellings would need to be accommodated across the District (in addition to commitments) and that 30% of these (1,100 dwellings) would be in or adjoining the PUA. It was also considered that development adjacent to Oadby would link with strategic allocations being considered as options by Oadby and Wigston Borough Council as part of developing its Core Strategy.
22. However, subsequently updated information on commitments as of March 2010 indicated a reduced need for approximately 2,700 additional dwellings across the District. In addition the now adopted Oadby and Wigston Core Strategy proposes housing growth to the south east of Wigston rather than at Oadby. The Council also reconsidered the balance of housing development across the District taking account of consultation with local communities. In the light of these factors the scale of additional housing development required in and adjoining the PUA in Harborough is substantially less than previously envisaged and would not justify a free standing strategic development area along the A6, large enough to support services and facilities.

23. The reduced scale of housing development can be accommodated within and adjacent to Scraftoft, Thurnby and Bushby where it can be better related to existing services and facilities and would be more compatible with regeneration initiatives in Oadby and Wigston. The overall approach to development in this part of the District as set out in Policy 1 is justified therefore.
24. However, Policy 1 refers to the Leicester Urban Fringe rather than the PUA and it is not sufficiently clear whether development would be limited to sites within and adjoining the settlements of Scraftoft, Thurnby and Bushby or also considered appropriate elsewhere adjoining the PUA (i.e. adjacent to the built up area of Oadby). This lack of clarity is compounded by inconsistencies in the definition of the area elsewhere in the Core Strategy.
25. Lutterworth and Broughton Astley are both identified in Policy 1 as Key Centres acting as a focus for development outside of Market Harborough and the PUA. Lutterworth has a good range of services and facilities and a well defined town centre. Its size and level of services clearly distinguish it from other smaller settlements and it has an important role as a centre for a wide catchment area.
26. Although Broughton Astley is similar to Lutterworth in terms of population (approximately 9,000), it has a much more limited range of services and facilities. Whilst there has been considerable housing growth over a number of years, this has not been matched by the development of services particularly in terms of retail floorspace and employment uses. The level and range of services currently available is not substantially different to the Rural Centre of Kibworth.
27. In identifying Broughton Astley as a Key Centre, the Core Strategy seeks to further develop its service base and its role within the wider area, recognising that in terms of population size, it is significantly larger than any of the Rural Centres. Subject to a clear emphasis on improving the level and range of services and a scale of housing provision which reflects its more limited service base, including Broughton Astley as a Key Centre along with Lutterworth is justified.
28. The Rural Centres of Kibworth, Fleckney, Great Glen, Billesdon, Ullesthorpe and Husbands Bosworth have been appropriately identified as such given the combination of their population size, service base and role as centres within the wider area, taking into account the relative proximity to larger settlements. The distinction between these and other villages is justified in order to give a focus for development and the provision of services in the rural area.
29. There is a lack of consistency and clarity in parts f) and g) of Policy 1 in terms of the reference to housing and the need for development to serve the settlements themselves as well as their catchment areas.

Green Wedges and Areas of Separation

30. Green Wedges adjacent to Scraftoft, Thurnby and Bushby have an important role in preventing the merging of settlements, guiding development form and providing access to strategic green space and recreational opportunities

around the PUA. In a number of cases across the District, it is also important to retain a separation between settlements to safeguard their individual character and the distinct identities of communities. Although the intention is for the principle of Green Wedges and Areas of Separation to be retained whilst reviewing the detailed boundaries as part of the process of preparing the Allocations DPD and accommodating necessary growth, Policy 1 is insufficiently clear in this respect. It is also not clear that Green Wedges will help to guide development form. This final point also applies to Policy 8.

Previously developed land

31. Despite the limited amount of previously developed land which has been identified for potential future development, it is appropriate for the Core Strategy to set out a clear priority for the use of such land, consistent with national policy in PPS1 and PPS3. However, the specific reference to a sequential approach is inconsistent with national policy and could place undue restraint on development or cause delays in the process.

Conclusion on Issue 1

32. The Spatial Strategy and the approach to the overall provision of housing set out in Policy 1 is justified and consistent with the wider strategic context. However, it is ineffective due to a lack of sufficient clarity, consistency and flexibility and is inconsistent with national policy in terms of the plan period and the approach to previously developed land.
33. The Council's suggested changes (**SC0.1, SC1.1-SC1.4, SC2.6 and SC8.1**) would extend the plan period to 2028 and provide clarity in terms of the relationship to the evidence base and the future review of the Core Strategy. They would ensure that adequate provision for housing was made for this extended plan period and clarify that this provision is regarded as a minimum. The changes would also provide clarity and consistency in terms of the definition of the PUA and the approach to development within it, the role of Key Centres and Rural Centres and the approach to Green Wedges and Areas of Separation. In addition they would remove the reference to a sequential approach to previously developed land.
34. These changes are necessary to ensure that the Spatial Strategy and the approach to the overall provision of housing set out in Policy 1 would be effective and consistent with national policy.

Issue 2 – Whether the approach to the distribution and delivery of new housing set out in Policy 2 is justified, effective and consistent with national policy

The distribution of housing

35. Table 3 of the submitted Core Strategy illustrates how the overall housing provision between 2006 and 2026 is intended to be distributed across the District. It also identifies the number of additional dwellings required in each area taking into account those built since 2006 and those remaining on allocated sites or with planning permission as of 31 March 2010. This is referred to as planned growth and forms the basis of the figures for additional dwellings set out in Policy 2.

36. Policy Three Cities SRS 3 of the RS states that of the 350 dwellings per annum in Harborough, at least 40 should be within or adjoining the PUA and that development in the remainder of the District will be located mainly at Market Harborough.
37. Harborough is a large, mainly rural District. In addition to the PUA and Market Harborough the Core Strategy identifies two Key Centres and six Rural Centres. There are also a number of other smaller villages which contain a basic level of services and facilities. It is important that the needs of all parts of the District for development are met, not least in terms of affordable housing. A balance needs to be struck therefore between concentrating growth on the PUA and Market Harborough and ensuring an appropriate distribution of additional housing across other suitable settlements.
38. Based on the figures set out in the submitted Core Strategy, the overall provision for the PUA would be approximately 38 dwellings per annum (2006-2026). Given the clear and specific policy requirement and the wider regional strategy of focussing development on the PUA, the overall provision in this part of the District should be increased to at least 40 dwellings per annum to ensure that the Core Strategy is in general conformity with the RS. There is no evidence that such a modest increase in the annual provision would have adverse consequences in terms of the character of settlements or put undue additional pressure on local infrastructure including the transport network, even taking account of an extended plan period to 2028.
39. This would give an overall provision of at least 880 dwellings between 2006 and 2028. Taking into account dwellings already built or committed, there would be a need to accommodate at least 473 additional dwellings. The Strategic Housing Land Availability Assessment (SHLAA) indicates potential capacity well in excess of this figure.
40. There is no guidance in the RS as to the specific number or proportion of dwellings considered appropriate in Market Harborough compared to the rest of the District. As the principal town and main focus for development, it is clear that Market Harborough should accommodate a significant proportion of additional housing, relative to other individual settlements. As I have noted above however, it is also important to achieve a reasonable spread of development across the District.
41. Furthermore, the ability of Market Harborough to accommodate additional housing growth is influenced by a number of factors. Much of the character of the town stems from its historic core and relatively compact nature. The built up area is largely well contained by surrounding topography and in many cases, further expansion would impinge upon sensitive landscapes. To the south the town already extends to the District boundary and to the west and north there is a need to retain the identity and character of Lubenham and Great Bowden as distinct and separate settlements. The highway network in the town centre has limited capacity to absorb traffic growth and there is little prospect of significant investment in additional transport infrastructure throughout the town as a whole. Potential development sites are also affected by the Rivers Welland and Jordan and their floodplains, the Grand Union Canal and the routes of the A6 bypass and the East Midlands railway line. There is a limited supply of previously developed land within the town.

42. The SHLAA indicates potential capacity for some 1,953 dwellings in Market Harborough in addition to commitments (935 dwellings at the time of the SHLAA). Given the need for further detailed assessment of sites and the importance of retaining some flexibility, the realistically deliverable capacity is likely to be less than this. The assessment of the potential transport implications using the Leicester and Leicestershire Integrated Transport Model (LLITM Market Harborough Transport Evidence) indicates that subject to mitigation 1,700 additional dwellings could be accommodated in the town.
43. Taking all of these factors into account I consider that the proportion of total housing provision identified for Market Harborough in the submitted Core Strategy is appropriate (i.e. approximately 42% of the District total or 47% after deducting the provision in the PUA). This would represent a significant amount of the additional housing in the District and be compatible with the function of Market Harborough as the principal town and main focus for development. It would satisfy the requirements of Policy Three Cities SRS 3 of the RS.
44. With an extended plan period and some rounding of figures this would result in an overall provision of at least 3,300 dwellings between 2006 and 2028. Accounting for dwellings already built and commitments as of March 2011, approximately 1,450 additional dwellings would need to be provided up to 2028. The evidence on potential capacity and transport implications supports additional housing on this scale.
45. The overall provision for Lutterworth and Broughton Astley (approximately 9% and 5% of the District total respectively) would be compatible with their role as Key Centres. In the case of Lutterworth it would be broadly in proportion to the size of the population, taking account of the strategic need to focus development on Market Harborough and to a lesser extent the PUA. For Broughton Astley the reduced scale of overall provision would also reflect the more limited service base. Taking account of an extended plan period and some rounding of figures this would result in an overall provision of at least 700 dwellings in Lutterworth and 400 in Broughton Astley between 2006 and 2028. In addition to those already built and committed, there would be a requirement for some 560 and 283 additional dwellings respectively up to 2028. The SHLAA indicates that there is capacity to accommodate such levels of development with a degree of flexibility in terms of potential sites, particularly in the case of Broughton Astley.
46. There would be a residual overall provision of some 2,420 dwellings for the rest of the District. Of these, a significant number (1,887 dwellings) have already been built or are on committed sites. The SHLAA indicates that there is sufficient potential capacity to deliver the additional dwellings required.
47. In line with the Spatial Strategy set out in Policy 1, the six Rural Centres should be the focus for housing development beyond Market Harborough, the PUA and the Key Centres. It is also important however to ensure that the housing needs of other smaller settlements across the District are met. Policy 2 refers to provision for housing also being made in selected rural villages. These are defined in relation to Policy 17 as villages with at least two key services. There are currently 16 villages which would fall into this category.

48. The evidence on potential housing capacity does not distinguish between Rural Centres and selected rural villages. Given this, the large number of villages involved and the relatively limited amount of additional housing provision needed (taking account of past building and existing commitments) it would be inappropriate to attempt to split the overall provision between the two different categories of settlement. It would also reduce the flexibility of the Core Strategy.
49. The level of existing commitments in Kibworth and Great Glen is significant in relation to their size and service base (545 and 285 dwellings respectively). The Core Strategy is justified in taking the view that additional provision beyond small scale infill during the plan period would be inappropriate. However, the explanation to Policy 2 is not clear in this respect. It is also not clear that the Rural Centres will be the focus for additional housing and that development in selected rural villages will be on a lesser scale.
50. In focussing on the additional dwellings required rather than overall provision, Policy 2 and Table 3 lack sufficient flexibility to take into account up to date information on completions and commitments. They also do not give a clear enough illustration of the strategy for the distribution of housing over the plan period as a whole.
51. In addition to the obvious and unnecessary statement that sites with planning permission will be developed, part a) of Policy 2 lacks clarity in respect of the approach to additional housing development.

Previously developed land

52. Part c) of Policy 2 infers a sequential approach to previously developed land; as with Policy 1 this would be inconsistent with national policy. The issue would in any case be adequately dealt with in Policy 1 (as amended by suggested change).

Limits to development and the supply of housing land

53. The role of the limits to development in guiding housing development and dealing with specific proposals is insufficiently clear, as is the approach to reviewing their boundaries. Furthermore much of part e) of Policy 2 is unnecessary repetition of national policy in relation to a commitment to a 5 year supply of housing land and it lacks clarity in terms of dealing with specific proposals in the absence of such a supply.

The mix of housing types

54. The Strategic Housing Market Assessment (SHMA) provides evidence as to the mix of housing types needed in the District although the explanation is set out following Policy 3 rather than Policy 2. In principle requiring a mix of housing types in line with this evidence base (as updated over time) is justified and part f) of Policy 2 gives flexibility for other local evidence, such as from developers themselves to be taken into account. However, in many cases it is unlikely to be realistic to achieve a mix on small sites and applying the requirement to all proposals would be inconsistent with paragraph 24 of PPS3 which specifically refers to large strategic sites and takes a more flexible approach to smaller sites.

55. Taking account of the rural nature of the District and the prevalence of relatively small scale developments, a threshold of 10 units would be appropriate in terms of requiring a mix of dwelling types. This would ensure that the policy is realistically deliverable.

Density

56. The minimum density requirements set out in part f) of Policy 2 are justified in terms of providing for the efficient use of land and reflect the increased level of public transport accessibility and availability of services within the centres of Market Harborough and Lutterworth. Evidence from recent developments suggests that achieving such densities is realistic. The policy includes sufficient flexibility to allow for lower densities where specific circumstances or site characteristics apply.

Conclusion on Issue 2

57. The approach to the distribution and delivery of new housing set out in Policy 2 is justified. However, it is ineffective due to a lack of sufficient clarity and flexibility and insufficient realism in terms of delivery. It is inconsistent with national policy in terms of the approach to previously developed land.
58. The Council's suggested changes (**SC2.2, SC2.3, SC2.5 and SC2.7-SC2.11**) would clarify the strategy for overall housing provision in each part of the District for an extended plan period of 2006-2028 and provide flexibility to take account of up to date information on completions and commitments. They would ensure adequate provision up to 2028 in each area, introduce greater flexibility by making it clear that the figures are regarded as a minimum and increase the provision in the PUA to at least 40 dwellings per annum in line with the RS.
59. The changes would clarify the relative approach to Rural Centres and selected rural villages and the particular approach to additional housing provision in Kibworth and Great Glen. They would clarify the role of the limits to development in dealing with specific proposals and the approach to their review. The changes would also ensure that the approach to achieving a mix of housing types was realistically deliverable and in accordance with PPS3 and that it was clearly explained. In addition they would remove the inference of a sequential approach to previously developed land.
60. These changes are necessary to ensure that the approach to the distribution and delivery of new housing set out in Policy 2 would be effective and consistent with national policy.

Issue 3 – Whether the policies for places (Policies 13-17) are justified, effective and consistent with national policy

Market Harborough – Policy 13

61. A key element of the Core Strategy is the proposal for a Strategic Development Area (SDA) to the north west of Market Harborough which would accommodate 1,000 dwellings along with associated social and community infrastructure.

62. The SHLAA indicates limited capacity for development on previously developed land or generally on land within the existing built up area. On this basis and given the scale of additional housing required, most of the additional dwellings will need to be accommodated on greenfield sites on the edge of the town. As I have noted above however, there are a range of constraints which limit the potential for such sites to be identified. The development of numerous smaller sites around the periphery of the town would limit the scope for a co-ordinated approach to the delivery of social and community infrastructure and transport improvements. In any case, whilst the SHLAA identifies a number of potential sites (in addition to the SDA), even when combined they would fall well short of being able to deliver sufficient housing.
63. The requirement for additional housing and the infrastructure needs that go with it can only be met effectively by including a proposal for an SDA beyond the existing built up area. Given the physical and practical constraints there are only two potential options for an SDA, land to the north west or south east of the town.
64. In overall terms, the Market Harborough Landscape Character Assessment and Landscape Capacity Study considers the landscape to the south east of the town to be less sensitive with a greater capacity to accommodate development when compared with the area to the north west. However, there are physical constraints related to the East Midlands railway line and the River Jordan and its floodplain. Development on a significant scale to the south east of the town would also be likely to require substantial and costly improvements to the road network. There is little if any prospect of these improvements taking place over the plan period. Importantly, the SHLAA does not identify deliverable sites on the scale required in this area.
65. Although the land to the north west of the town includes landscape areas considered to be of moderate/high sensitivity, there appear to be no fundamental physical or practical constraints which would prevent its development. There is genuine interest from landowners and developers and in overall terms housing on the scale required is realistically deliverable.
66. The proposed SDA to the north west of Market Harborough would inevitably reduce the compactness of the town and have some effect on its landscape setting. Development on the scale envisaged would also generate substantial additional traffic movements and place further pressure on the road network, particularly in the town centre. However, there is scope for development to avoid the most prominent and sensitive landscape parcels and to incorporate strategic landscaping. There is also potential for the development to fund measures to mitigate the effects on the transport network.
67. The proposed SDA is necessary to meet the need for additional housing in Market Harborough. The proposal is supported by evidence and is the most appropriate strategy when considered against reasonable alternatives.
68. The requirement for additional dwellings in Market Harborough would be increased from the 1,200 set out in Policy 13 as a consequence of extending the plan period to 2028. On the basis of landscape and transport evidence there would appear to be potential to increase the scale of housing provision as part of the SDA. On the other hand there are other smaller sites which

could deliver housing in a range of locations and indeed may come forward in the short term. It is important that some flexibility is retained and that decisions on specific allocations are taken in the light of up to date information at the time. It is also important that a reasonable balance of housing development takes place over the District as a whole.

69. Making it clear that the provision of 1,000 dwellings as part of the SDA is regarded as a minimum would provide scope for more dwellings as part of an allocation or specific proposal, if this was considered appropriate at the time, without reducing the potential for other sites to come forward.
70. Despite its importance to the overall strategy, there would be no particular benefit in allocating the SDA as a strategic site in the Core Strategy in terms of delivery. There is no evidence that investment requires a long lead in time and indeed a specific proposal has already been submitted to the Council in the form of an application for outline planning permission. Allocating a specific site would unnecessarily reduce flexibility and including an allocation in the Core Strategy at this stage would require additional work and delay its adoption.
71. Part a) of Policy 13 lacks flexibility to take into account up to date information on existing commitments and the potential supply of previously developed land. It is also not clear that the provision for housing is considered as a minimum. It lacks clarity as to the strategy for accommodating sufficient housing and the role of the SDA in achieving this and would in any case be unnecessary in the light of Policy 3 and the suggested changes to Policies 1 and 2 and associated paragraphs.
72. Depending on its scale, development to the north west of the town may well at some point require a link road between the A4304 and B6047. It is not clear from Part b) that development of the SDA should retain the flexibility to provide such a link. Part c) does not adequately reflect the latest evidence on the transport implications of the SDA (LLITM Market Harborough Transport Evidence) and the mitigation likely to be required.
73. The Leicester and Leicestershire HMA Employment Land Study (HMA Employment Land Study) concludes that there is no strategic need for additional employment land allocations in the District. It suggests however that there may be a need for provision in Market Harborough of approximately 5ha towards the end of the plan period to offset losses due to changes of use or to accommodate other employment generating uses such as leisure. However, there seems little basis for such a specific requirement at this stage, in advance of a review of sites and the reference to 5ha is insufficiently flexible.
74. It is also not clear whether the 5ha of employment land proposed for Market Harborough would necessarily be included in the SDA. In any case there is no clear justification as to why proximity or ease of access to the SDA or other areas of significant housing growth should be a particular factor in determining the location of additional employment land and this reduces the flexibility to bring forward sites in sustainable locations elsewhere in the town. The opening paragraph of part e) does not provide a sufficiently positive approach to the enhancement of the role of the town as a focus for employment.

75. Although the intention is to retain the principle of the Area of Separation between Great Bowden and Market Harborough whilst reviewing the detailed boundaries as part of the process of preparing the Allocations DPD and accommodating necessary growth, part f) is insufficiently clear in this respect.
76. Policy 13 is consistent with national policy. However it does not fully reflect the evidence available on transport implications and employment land and is therefore not justified. It is also ineffective due to a lack of sufficient clarity and flexibility. The Council's suggested changes (**SC13.1-SC13.4**) would address these concerns and ensure that Policy 13 was justified and effective.

Lutterworth – Policy 14

77. On the basis of evidence from the SHLAA, it is likely that development on greenfield land beyond the existing limits to development will be required. Potential options for growth are severely limited by the proximity of the M1 to the east and the A4303 to the south, areas of sensitive landscape and flood risk and the need to maintain a separation between Magna Park, Bitteswell and Lutterworth. Realistically, any expansion of the built up area would need to take place to the north.
78. However, whilst the overall approach to the scale and location of development is justified, part a) of Policy 14 is not sufficiently clear in this respect. Although it is important to establish the direction of growth, the approach to limits to development, previously developed land and affordable housing would in any case be dealt with adequately by Policy 3 and the suggested changes to Policies 1 and 2 and associated paragraphs. Part a) also lacks flexibility to take into account up to date information on existing commitments and the potential supply of previously developed land and it is not clear that the provision for housing is considered as a minimum. The opening paragraph of the policy does not make it clear that Lutterworth will also be a focus for housing.
79. The issue of heavy goods vehicles (HGVs) using the A426 and in particular passing through the town centre is a key concern for the local community. The Policy quite rightly seeks to address this in terms of the approach to the location of future HGV generating development and the change of use of existing employment land, along with traffic calming, junction improvements and support for lorry routeing schemes.
80. Shifting the balance of HGV generating development within the town is a long term strategy given the powers available to the Council. However, there is little if any prospect of funding being available during the plan period for a bypass which would be effective in significantly reducing the flow of HGVs through Lutterworth. Given this context, Policy 14 takes a realistic and appropriate approach to the issue.
81. Although the intention is to retain the principle of the Area of Separation between Magna Park, Bitteswell and Lutterworth whilst reviewing the detailed boundaries as part of the process of preparing the Allocations DPD and accommodating necessary growth, part e) is insufficiently clear in this respect. In addition the Key Diagram and the diagram on page 87 lack clarity as to the broad location of the Area of Separation.

82. Policy 14 is justified and consistent with national policy. However, it lacks effectiveness due to insufficient clarity and flexibility. The Council's suggested changes (**SC14.1-SC14.4**) would address these concerns and ensure that Policy 14 was effective.

Leicester Urban Fringe/Principal Urban Area – Policy 15

83. Policy 15 is insufficiently clear in respect of the overall scale of housing planned for the PUA and the strategy to accommodate development within it and refers to the Leicester Urban Fringe rather than the PUA. It also lacks flexibility to take into account up to date information on existing commitments and it is not clear that the provision for housing is considered as a minimum. Furthermore the approach to affordable housing would be adequately dealt with by Policy 3.
84. Although the intention is to retain the principle of the Leicester/Scraftoft and Thurnby/Leicester/Oadby Green Wedges and the Area of Separation east of Station Lane/south of Covert Lane whilst reviewing the detailed boundaries as part of the process of preparing the Allocations DPD and accommodating necessary growth, Policy 15 is insufficiently clear in this respect. It is also not clear that Green Wedges will help to guide development form.
85. Policy 15 is justified and consistent with national policy. It is not effective however due to a lack of clarity and flexibility. This lack of effectiveness would be addressed by the Council's suggested changes (**SC15.1-SC15.5**).

Broughton Astley – Policy 16

86. Part a) of Policy 16 lacks clarity in terms of the strategy for accommodating development and would be insufficiently flexible to take account of up to date information on existing commitments. It is also not clear that the provision for housing is considered as a minimum. The approach to limits to development and affordable housing would be adequately dealt with by Policy 3 and the suggested changes to Policy 1. The role of Broughton Astley in providing housing is not clear from the opening paragraph of the policy.
87. Although reference is made in the policy to improving the provision of services and facilities, there is a lack of clarity as to how this may be achieved and specifically it is not clear that the Allocations DPD will provide the opportunity to positively plan for additional retail, employment and community facilities.
88. Policy 16 is justified and consistent with national policy. Due to a lack of clarity and flexibility, it is not effective however. The Council's suggested changes (**SC16.1-SC16.3**) would ensure that Policy 16 is effective.

Countryside, Rural Centres and Rural Villages – Policy 17

89. The distinction between Rural Centres and other villages in terms of the scale of development envisaged is not sufficiently clear in Policy 17, nor is it clear that in all cases the scale of development will need to reflect the size and character of the village and the level of services and take account of recent development and existing commitments. There is also a lack of clarity in terms of the explanation for the particular approach to additional housing in Kibworth and Great Glen.

90. The requirements in respect of affordable housing and meeting local housing need are not clear. Nor is the role of limits to development and previously developed land in accommodating development. The policy would be insufficiently flexible to take account of up to date information on existing commitments.
91. The final sentence of part d) unnecessarily replicates part g) of Policy 7 in relation to the approach to economic development in the countryside.
92. Policy 17 is justified and consistent with national policy. It lacks sufficient clarity and flexibility however and is therefore not effective. This lack of effectiveness would be addressed by the Council's suggested changes (**SC17.1-SC17.3**).

Issue 4 – Whether the approach to delivering affordable housing is justified, effective and consistent with national policy

93. The SHMA identifies a need for 264 additional affordable dwellings per annum in Harborough. This would represent 75% of the total planned housing provision of 350 dwellings. It is accepted however that this would be an unrealistic target in terms of actual delivery.
94. Additional work on the viability of seeking affordable housing was undertaken (Affordable housing provision and developer contributions final report Sept 2009). This concludes that a contribution to affordable housing provision could be sought on all housing sites regardless of size. It also provides evidence that achieving 30% affordable housing provision is viable across the District and that in the two highest value sub-market areas (Harborough Rural South West and Harborough Rural North and Central) 40% would be viable.
95. The report makes it clear however that the viability of specific proposals will need to be taken into account. It is also based on information available at the time in terms of land values and property prices.
96. Since the adoption of the Supplementary Planning Document on Affordable Housing in 2006, the Council has applied a threshold of 5 or more dwellings in seeking provision for affordable housing as part of development proposals. However, a significant proportion of dwellings permitted are on sites below this threshold (42% across the District between 2006 and 2009 and 70% in smaller settlements). Significant opportunities to deliver affordable housing have been missed therefore.
97. Given the evidence on housing needs and viability and taking into account the rural nature of the District and the contribution of small sites to housing delivery, the principle of applying a threshold of 1 dwelling and seeking either 30 or 40% affordable housing provision depending on the sub-market area is justified. The overall target of achieving 90 affordable dwellings per annum across the District is realistic in this context.
98. However, it is not sufficiently clear that Policy 3 would apply to changes of use/conversions in addition to new build schemes or that the threshold relates to a net increase in the number of dwellings on the site. The policy lacks flexibility to take into account updated information on affordable housing needs. Crucially it also lacks the flexibility to take account of evidence on the

likely effect of the requirements on the viability of specific proposals.

99. The circumstances where commuted sums rather than on site provision would be sought are not clear, particularly in terms of how the policy would be practically applied to very small sites i.e. 1 or 2 dwellings. There is a lack of clarity in relation to the use of commuted sums and the direct (geographical) relationship to the scheme which generated them. The extent of each sub-market area and the settlements included within them is also not sufficiently clear.
100. The lack of reference to the potential for rural exception sites to at least be considered unnecessarily reduces the flexibility of the policy.
101. Policy 3 is justified and consistent with national policy. However, it is not effective due to a lack of sufficient clarity and flexibility. The Council's suggested changes (**SC3.1-SC3.4**) are necessary to ensure that Policy 3 is effective.

Issue 5 – Whether the approach to economic and business development is justified, effective and consistent with national policy

102. The RS does not set out employment land requirements. The criteria for site allocations set out in Policy 20 of the RS include the need for them to assist the development of sites in the Priority Areas for Regeneration (identified in Policy 19), contribute to the regeneration of urban areas and be on a scale consistent with the policy of urban concentration (set out in Policy 3).
103. The HMA Employment Land Study provides the most up to date comprehensive evidence on employment land requirements in Harborough and indeed the wider Leicester and Leicestershire HMA. For offices and industrial land it identifies that supply is in excess of estimated demand to 2026. For warehousing land, whilst it identifies a shortfall of approximately 33ha, this is due to the use of a standardised methodology for estimating the rate of renewal of existing stock. In the case of Harborough, a substantial proportion of warehousing space has been developed relatively recently at Magna Park and the renewal rate is therefore considered to be an over-estimate. The scale of recent development at Magna Park has also heavily influenced calculations on take up rates.
104. As noted above in relation to Policy 13 the study concludes on this basis that there is no strategic need for additional employment land of any type in Harborough.
105. Policy 21 of the RS deals specifically with strategic distribution uses and makes it clear that priority should be given to sites which can be served by rail freight and operate as inter-modal terminals. The RS refers to the East Midlands Strategic Distribution Study published in 2006 (EMS DS). In terms of land for warehouse units greater than 25,000sqm, the EMS DS concludes that some 308ha of rail connected sites and 78ha of non-rail connected sites would be required in the East Midlands region as a whole in the period up to 2026. It points out however that given existing supply, additional non-rail linked sites will not be needed until the later years of the RS.
106. Further analysis of potential supply undertaken on behalf of Gazeley UK (the

developers of Magna Park) concludes that the shortfall of non-rail connected sites is some 34ha. Again this relates to the region as a whole. Whilst Policy 21 of the RS identifies five HMAs (including Leicester and Leicestershire) as areas of preference for strategic distribution sites, it does not indicate how additional provision should be apportioned between them. There is no clear basis in either the RS or the EMSDS to determine how much, if any of the regional shortfall should be met in the Leicester and Leicestershire HMA, let alone individual Districts such as Harborough.

107. As set out above, the HMA Employment Land Study does not identify a need for additional land for warehousing in Harborough given the age structure of existing provision. The Harborough Employment Land Study predates this and in any case only assesses requirements up to 2016 and does not distinguish between warehousing and other industrial space. It is of little direct relevance to the issue of provision for strategic distribution uses.
108. Magna Park is a large and successful distribution facility of strategic significance and is the largest focus for employment in the District. There is very little, if any, capacity for additional development on the existing permitted site, despite continuing demand. The site is well located in relation to the road network (A5, M1 and M6).
109. However, whilst some occupiers transport freight to the Daventry International Rail Freight Terminal (DIRFT) some 15km away, Magna Park itself has no rail connection. In terms of the RS, Magna Park is not in a Priority Area for Regeneration. Furthermore, significant expansion of the site would not contribute to the regeneration of urban areas, nor would it be consistent with the policy of urban concentration.
110. Evidence on a local level does not suggest a need for additional land for warehousing in the District. There is evidence to support additional non-rail connected sites for strategic distribution uses in the East Midlands, towards the end of the RS period. However, there is no substantive evidence that further expansion at Magna Park would represent the most appropriate option in the region as a whole, particularly given the inconsistency with RS policy objectives.
111. Taking all of these factors into account, it would be inappropriate for the Core Strategy to promote further significant expansion at Magna Park. Part j) of Policy 7 is justified therefore in making it clear that development beyond the existing footprint will not be supported, whilst safeguarding the role of the site as a strategic distribution centre accommodating large scale units.
112. As noted in relation to Policy 13, whilst the HMA Employment Land Study suggests that there may be a need for provision in Market Harborough of approximately 5ha to offset losses due to changes of use or to accommodate other employment generating uses such as leisure, there seems little basis for such a specific requirement at this stage. In advance of a review of sites the reference to 5ha of employment land in part b) of Policy 7 is insufficiently flexible.
113. Again, as in the case of Policy 13 there is no clear justification as to why proximity or ease of access to the SDA or other areas of significant housing

growth should be a particular factor in determining the location of additional employment land and this reduces the flexibility to bring forward sites in sustainable locations elsewhere in the town. Parts a) and d) of Policy 7 provide a sufficiently positive and flexible approach for the review of existing sites and the potential provision of additional employment land in Market Harborough and other settlements in the District.

114. In referring to the countryside, Part g) is insufficiently clear that it relates to areas beyond settlements. It is also inconsistent with Policy EC6.2C of PPS4 in that it seeks to limit the re-use of buildings to those worthy of retention.
115. Bruntingthorpe Proving Ground and Industrial Estate cover a very large area (some 265ha) and make a significant contribution to the local economy. However, part i) of Policy 7 does not contain strategic proposals for the area or advocate expansion of the site. It simply recognises the existing role of the site and sets out detailed matters relating to the use and appearance of existing buildings, landscaping, access, parking and servicing arrangements. These are not necessary or appropriate in a core strategy and in any case are largely dealt with by Local Plan policies which will be retained.
116. Likewise part k) of the policy deals with detailed development management issues at Magna Park which are unnecessary and inappropriate in a Core Strategy.
117. Aspects of Policy 7 are not genuinely strategic or supported by robust evidence, it is therefore not justified. It is inconsistent with national policy in relation to the re-use of buildings in the countryside. The policy also lacks effectiveness due to insufficient clarity and flexibility. These concerns would be addressed by the Council's suggested changes (**SC7.1-SC7.4**) and subject to these changes Policy 7 would be justified, effective and consistent with national policy.

Issue 6 – Whether other policies (Policies 4, 6, 9 and 11) are justified, effective and consistent with national policy

Providing for Gypsy, Traveller and Travelling Showpeople - Policy 4

118. Whilst the overall approach to accommodating Gypsy, Traveller and Travelling Showpeople is justified given the evidence available, it is insufficiently clear that the provision is considered a minimum. There is a lack of sufficient clarity as to whether the criteria in the policy apply to transit sites and stand alone stables. There is also a lack of clarity and flexibility with regard to the relationship of sites to settlements and services.
119. Policy 4 is justified and consistent with national policy. It is ineffective due to a lack of clarity and flexibility however. The Council's suggested change (**SC4.1**) would ensure that the policy is effective.

Improving Town Centres and Retailing – Policy 6

120. Given the number and range of retail and other main town centre uses in Lutterworth, its definition as a Town Centre along with Market Harborough is justified. Although the number and range of such uses in Broughton Astley and its current role in the wider area is not substantially different to Kibworth,

its designation as a District Centre reflects its overall size and its inclusion as a Key Centre. In particular it is consistent with the strategy of encouraging and facilitating additional services to enhance its role. The retail hierarchy set out in Policy 6 is therefore appropriate. The policy is insufficiently clear however in terms of supporting and expanding retail provision in Broughton Astley.

121. In the light of the evidence available (Harborough District Retail Study) the policy provides an appropriate basis for the provision of additional retail floorspace. Although the intention is to provide flexibility to take into account updated evidence on the need for floorspace and to regard the figures as minima, this is not clear from the policy.
122. Policy 6 is justified and consistent with national policy. It lacks sufficient clarity and flexibility to be effective however. These concerns would be addressed by the Council's suggested changes (**SC6.1-SC6.3**).

Addressing Climate Change – Policy 9

123. Policy 9 is justified in taking a positive stance towards the location and design of development in terms of reducing energy demands and increasing energy efficiency. Given that there is no specific evidence in relation to the potential effect on the viability of development proposals, it is appropriate to encourage the achievement of specific standards rather than require compliance. Such an approach provides sufficient flexibility and would not place undue burdens on development. With this in mind part d)ii of the policy lacks justification and is insufficiently flexible in requiring compliance with a particular BREEAM assessment rating.
124. Part e)ii of the policy is inconsistent with Policy HE1.2 of PPS5 in terms of the potential effect on heritage assets and their settings. Part e) also lacks sufficient clarity in relation to the potential impact on the landscape and its character.
125. Policy 9 lacks sufficient justification and is inconsistent with national policy. It also lacks effectiveness due to insufficient clarity and flexibility. The Council's suggested changes (**SC9.1 and SC9.2**) would address these concerns.

Promoting Design and Built Heritage – Policy 11

126. In overall terms Policy 11 provides an appropriate and comprehensive basis for good design and the preservation and enhancement of the District's built heritage. However, it is inconsistent with PPS5 in that it does not include reference to the setting of heritage assets and refers to scheduled "ancient" monuments. It is insufficiently clear in relation to the approach to seeking statutory listing and development to secure the future of heritage assets at risk. It also lacks sufficient clarity in terms of the approach to the Grand Union Canal and Foxton Locks and the status of the Locks and the remains of the inclined plane.
127. Policy 11 is justified. It is however inconsistent with national policy and lacks effectiveness due to insufficient clarity. The Council's suggested changes (**SC11.1-SC11.5**) would address these concerns.

Issue 7 – Whether the approach to infrastructure requirements and delivery is clear and realistic and whether the Core Strategy is sufficiently flexible and able to be monitored effectively

Infrastructure

128. Appendix 2 of the Core Strategy sets out a schedule of infrastructure likely to be required to support the proposed scale and distribution of development. Whilst in many cases the requirements lack specific detail and most of them have no estimates of costs attached, this is a reflection of the level of information available and the strategic nature of the Core Strategy. Key infrastructure providers have been involved during the preparation of the Core Strategy. Policy 12 also makes it clear that the schedule will be subject to annual review and will be updated in liaison with infrastructure providers. Given this context, the overall approach to the identification and provision of infrastructure requirements is realistic.
129. Further information emerged during the course of the Examination in terms of the likely transportation infrastructure requirements within Market Harborough. More specific evidence on requirements for community/recreation facilities is also now available. In the light of this evidence, Appendix 2 does not provide sufficient clarity on these matters.
130. It is not clear on the basis of evidence currently available that the development proposed in the Core Strategy would have a direct impact on the operation of Junction 20 of the M1 to the extent that it would justify the inclusion of requirements for improvements at the junction to be set out in Appendix 2. As noted above, the schedule would be subject to regular review and would be able to take account of additional evidence on infrastructure requirements.
131. A key element in funding infrastructure will be contributions from developers. The approach to such contributions is not clear from Policy 12, particularly in respect of the role of the Community Infrastructure Levy and the Council's plans to introduce a charging schedule, the role of planning obligations and interim arrangements. It is also not clear that the potential effect on the viability of development proposals will be taken into account when seeking contributions.
132. The approach to infrastructure requirements is realistic. It lacks effectiveness due to insufficient clarity however. The Council's suggested changes (**SC12.1, SC12.2 and SCA2.1-SCA2.3**) would address this concern ensuring that Policy 12 and Appendix 2 are effective. They would also reflect other changes concerning the plan period and the overall scale of development planned.

Delivery

133. The implementation and delivery of the proposals within the Core Strategy would not depend on large scale infrastructure projects such as road schemes or site remediation works nor would it rely to any significant extent on public sector funding. There are no regulatory or national policy barriers to delivery.
134. For the most part, the proposals would be delivered by the private sector. There is a strong housing market and levels of investment and development in

Harborough have remained relatively buoyant, even in recent years during a difficult economic climate. There is clear interest from the development industry across all parts of the District. The scale of development envisaged is realistic given past trends and there is evidence that there is capacity to deliver it.

135. The housing trajectory set out in Appendix 1 is based on realistic assumptions on existing commitments, lead in times and development rates. The Council's suggested change (**SCA1.3**) would be necessary to reflect the other changes referred to previously concerning the plan period, up to date information on completions and commitments and the number of additional dwellings to be planned for. Subject to this change the approach to delivery would be clear and realistic.

Flexibility

136. In overall terms the Core Strategy avoids taking an unduly prescriptive approach to future development and strikes the right balance between providing a clear strategic framework whilst allowing sufficiently flexibility. In particular the Spatial Strategy and the approach to the location of new housing would provide a wide range of opportunities to meet the development needs of the District.
137. Given the relatively limited reliance on public sector funding and the lack of any requirement for major infrastructure works, there are no particular uncertainties in terms of delivery. There is significant demand from the development industry and the housing market is strong. There is clear evidence that sufficient land is likely to be available in the right places to deliver the strategy.
138. There are a number of individual policies referred to in previous sections of this report where the necessary degree of flexibility is not clear, for instance in terms of the need to regard housing provision as a minimum, to take into account the potential effect on the viability of development proposals or to adapt to updated information. The Council has suggested changes to address these specific concerns. These changes would also provide an appropriate policy basis (alongside retained Local Plan policies) to ensure continued delivery of housing and other development even if the Allocations DPD was delayed.
139. Subject to the changes to individual policies referred to above, the Core Strategy would be sufficiently flexible.

Monitoring

140. The arrangements for monitoring are clear and appropriate and Appendix 4 incorporates a comprehensive set of indicators and targets against which to measure the implementation of the objectives and policies of the Core Strategy. However, the target for the delivery of housing lacks milestones to enable a responsive monitoring framework for each five year period. It is also not clear that the target for the proportion of dwellings built on previously developed land is a minimum. In these respects the Core Strategy would not be able to be monitored effectively.

141. The Council's suggested changes (**SCA4.1-SCA4.3**) would be necessary to address these concerns and reflect other changes relating to the plan period, the number of additional dwellings to be planned for, employment land and the need to regard development requirements as minima.

Legal Requirements

142. My examination of the compliance of the Core Strategy with the legal requirements is summarised in the table below. I conclude that subject to the changes indicated the Core Strategy meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Core Strategy is identified within the approved LDS (December 2010) which sets out an expected adoption date of December 2011. The Core Strategy's content and timing are compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in 2006 and consultation has been compliant with the requirements therein, including the consultation on the Council's suggested changes.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations AA Screening Report (April 2011) sets out why AA is not necessary.
National Policy	The Core Strategy complies with national policy except where indicated and changes are recommended.
Regional Strategy (RS)	The Core Strategy is in general conformity with the RS subject to the Council's suggested change (SC2.3). The Council's suggested changes (SC0.2, SC2.1 and SC2.4) are necessary to clarify the situation regarding the RS and the strategic context it provides for the Core Strategy.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act and Regulations (as amended)	The Core Strategy complies with the Act and the Regulations.

Overall Conclusion and Recommendation

143. **I conclude that with the changes suggested by the Council, set out in Appendix A, the Harborough Core Strategy Development Plan Document satisfies the requirements of s20(5) of the 2004 Act and meets the criteria for soundness in PPS12. Therefore I recommend that the plan be changed accordingly. And for the avoidance of doubt, I endorse the Council's proposed minor changes, set out in Appendix B.**

Kevin Ward

INSPECTOR

This report is accompanied by:

Appendix A (separate document) Council Changes that go to soundness

Appendix B (separate document) Council's Minor Changes