

HARBOROUGH LOCAL PLAN EXAMINATION STAGE 2 MATTERS, ISSUES AND QUESTIONS IDENTIFIED BY THE INSPECTORS**ON BEHALF OF BLOOR HOMES (RESPONDENT 8317) – MATTER 1 PROCEDURAL AND LEGAL REQUIREMENTS****Background**

This Matter Statement is submitted on behalf of Bloor Homes, who have land interests at Scraftoft. Bloor Homes will be bringing forward the residential development at proposed Site Allocation S2 (Land at Beeby Road, Scraftoft). Bloor Homes also control further land adjacent to this proposed allocation which they are promoting for residential development. Bloor Homes refer to their previous response to the Harborough Local Plan 2020-2041 (Regulation 19 Consultation) in April 2025 with this statement also reflecting updates since then, including additional evidence base documents produced by the Council and the Council's proposed scheduled of modifications (Appendix 1 to document HDC 2).

Bloor Homes welcome the opportunity to continue their involvement in the preparation of the Harborough Local Plan and to participate in the forthcoming Hearings.

Issue 1: Sustainability Appraisal

Question 2. How has the SA informed the development of the Plan, including housing and economic needs, delivery and any mitigation measures? How has it informed the selection of strategic options, the development of policies and the selection of sites, all of which aim to identify sustainable development outcomes for the District?

1. It is noted that the outcomes of the SA have informed the selection of the most appropriate strategic growth option (in terms of quantum of development); the most appropriate strategic spatial option (which includes the directing of development to the most sustainable locations and utilising the settlement hierarchy including the Tier 1 Adjoining Leicester Urban Area); and have been used to inform the selection of sites as incorporated within the Site Selection Methodology (February 2025, updated in February 2026) [PRE-NLP 5]. Paragraph 5.4 notes that whilst the outcomes have been used to inform which site progress through the site selection process, this does not determine the outcome of the site assessment process, with the SA being part of the overall appraisal of sites when considering a range of factors. An SA appraisal summary is included within the Stage 4 – technical site proformas for each site within Appendix 4 to PRE-NLP 5.

2. The PPG for SAs (Paragraph: 018 Reference ID: 11-018-20140306) states 'reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan...' (emphasis added). As per the response to Question 3 below, in the context of the potential for a higher housing growth option, Bloor Homes consider that this could have been assessed further as a 'reasonable alternative' against the refined housing distribution options.

Question 3. What is the robust justification for the selection of the medium level of growth scenario against which the refined housing distribution options were tested? Should they have been tested against all three growth scenarios?

3. It is noted that paragraph 5.6 of the SA states that the Low Growth (only reflects the Council's LHN over the plan period) and High Growth (reflects the Council's LHN plus an additional 246 homes per year) scenarios were discounted due to several factors. The supporting Development Strategy Paper (2025) [PRE-NLP 4] at paragraph 14-15 states the High Growth option was not taken forward due to its identified negative impacts, but recognises the comparable positive social impacts compared to the Medium Growth option. This includes its positive impact on addressing overall housing needs, including affordable needs (SA Objective 9: Provide affordable, sustainable, good-quality housing for all).
4. As per Bloor Homes' Regulation 19 response, the Plan could have considered the potential to accommodate higher housing growth in relation to meeting affordable housing needs and reflecting the changes in local housing needs arising from updates to the standard method for calculating local housing needs, which as of May 2026 is 755 dwellings per annum, versus the Plan baseline of 534 dwellings per annum based on the 2023 standard method. Even accounting for the higher rate of 657 dwellings per year in 2020-2036, the plan provision for 2020-2041 at 628 dwellings per annum is still below the updated standard method needs.
5. Whilst it is recognised that the standard method for calculating housing needs incorporates an affordability uplift, the significant overall increase in needs for Harborough arising from changes between the 2023 and 2026 standard method should be a consideration in affordable housing need terms. As noted in Bloor Homes' Regulation 19 response, the Harborough Local Housing and Employment Land Evidence (February 2025) [EMP-NLP 5] at pages 4 and 67 identifies the significant scale of affordable housing need (421 affordable homes per year). The PPG for Housing needs of different groups at paragraph: 008 Reference ID: 67-008-20190722 states that an increase in the total housing requirements may need to be considered where it could help deliver the required number of affordable homes.

6. In response to the Regulation 19 Plan, Bloor Homes also noted that a higher housing growth option could provide headroom to account for the ongoing unmet needs of Leicester. As per the Leicester and Leicestershire Authorities Statement of Common Ground relating to Housing Distribution following NPPF and new Standard Method [SCG-NLP 18] there is evidence of ongoing unmet needs for Leicester beyond the Harborough Plan period of 2041 with the updated assessment work referenced in SCG-NLP 18 identifying unmet needs up to 2046.
7. Paragraphs 4.10-4.14 of the Housing Topic Paper (April 2026) [TPC-NLP 7] outline that Harborough's contribution to unmet needs under the 2024 standard method would be lower due to a fall in Leicester's local housing needs (62 dwellings per annum versus the current 123 dwellings per annum). However, it also recognises that flexibility is required in this regard to accommodate potential redistribution requirements as the figures will be subject to update standard method figures and the progress of other relevant local plans. Nevertheless, the evidence identifies that Harborough will still need to consider the unmet needs of Leicester beyond 2036.
8. Therefore, the testing of a higher housing growth scenario against the refined housing distribution options could have been appropriate in this context.

Question 5. Are the scoring and conclusions reached in the SA reasonable, sufficiently accurate and robust so as to inform the Plan?

9. In relation to the site-specific scoring of proposed allocation S2: Land at Beeby Road, Bloor Homes would refer to their Regulation 19 representations, particularly considering the recent resolution to grant outline planning permission subject to Section 106 (reference 25/00767/OUT) at the site as resolved at Planning Committee on the 16th April 2025 which reinforces the previous comments made. The assessment of likely effects and scoring against the SA Framework in relation to the site does not therefore reflect the most up to date site-specific evidence.
10. These are however relatively minor scoring comments that do not undermine the overall robustness of the SA. As per the response to Question 1 above, Bloor Homes recognise that the SA outcomes have formed a part of a more detailed site assessment process, rather than being determinative.

Question 7. In overall terms does the Plan meet the legal requirements of Section 19(5) of the 2004 Act and accord with National Planning Policy Framework (NPPF) paragraph 32 and the Planning Practice Guidance (PPG) in this regard?

11. Bloor Homes consider that the Sustainability Appraisal (SA) methodology is legally compliant and overall is generally robust (please however see the comments in

response to the preceding questions regarding robustness). As per paragraph 32 and footnote 17 of the NPPF, the legal requirements in relation to SAs refers to Strategic Environmental Assessment (SEA).

Issue 3: Strategic Cross-Boundary Engagement

Question 1. The Council provides its Duty to Cooperate (Effective Cooperation) Statement of Compliance [SNLP9] and all signed Statements of Common Ground [SCG-NLP1-26 and HDC 4B, C, D, 9 and 15]. It considers together those demonstrate that the Council has collaborated effectively and constructively with neighbouring authorities and prescribed bodies on strategic cross-boundary matters throughout the Plan's preparation. Does this provide the necessary clear evidence of effective and ongoing joint working, in relation to matters including housing, transport, education provision and warehousing?

12. Bloor Homes considers that the evidence related to joint working provided supports the Council's position and the housing requirement of the Plan in respect of addressing the unmet housing needs of Leicester up to 2036. As per our response to Question 3 above, it is noted that there is evidence of ongoing unmet housing needs arising from Leicester beyond 2036 and the current Harborough Plan period of 2041, with the updated assessment work referenced in SCG-NLP 18 identifying unmet needs up to 2046.

Issue 5: Plan Period

Question 1. NPPF paragraph 22 sets out the requirement for strategic policies (other than those in relation to town centre development) to look ahead over a minimum of 15 years from adoption. The Plan period runs from 2020-2041. If adopted in Q2 2027 it would not meet that requirement. In doing so would this be a sound approach?

13. Bloor Homes consider that the Plan should be in accordance with national planning policy on this matter and include an additional year to the plan period. Should the additional plan period year require the identification of additional housing land supply, there are suitable, available and achievable sites readily available for consideration in accordance with the preferred spatial strategy, including at existing sustainable locations such as within Tier 1 Adjoining Leicester Urban Area settlements, such as Scraftoft.