

HBF response to Harborough Local Plan (March 2025) Examination

Matter 2: Local Plan Vision, District Portrait and Development Objectives

HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

Please note that we have not responded to all the questions only those of relevance to our members, and reflecting the issues in our Reg 19 response that HBF submitted.

Stage 2 Matters, Issues and Questions (MIQs)

Matter 2: Local Plan Vision, District Portrait and Development Objectives

Whether the Plan's Development Objectives would be effective in enabling delivery of the Plan's Vision?

Issue 1: Plan Vision

1. Is the Plan's Vision consistent with NPPF paragraph 15, which sets out that succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings? Should it refer to meeting local housing need and a proportion of Leicester's unmet need?

As we said in our Reg 19 response, HBF believe that the vision should be explicit in recognising the role of the Harborough Plan in helping to meet unmet need of neighbouring areas. From a deliverability perspective, this will be particularly important when discussions are being undertaken around nomination rights for affordable housing and whether people with a local connection to Leicester, or indeed Oadby and Wigston, should be eligible to live in new homes in Harborough.

Many housebuilders are experiencing difficulties in finding housing association partners for their s106 affordable homes, there are many reasons for this, but overly restrictive and constrained policy requirements only add to these challenges. This issue has been recognised nationally with the establishment of the national clearing house but our members experience suggest this is of limited success. Therefore, HBF support cascade mechanisms on all affordable homes to help ensure housing schemes are, and remain, deliverable. There is a need for clarity on the purpose of providing some new homes in Harborough to meet unmet needs from Leicester, and this should be included, justified and explained in the Vision section.

2. The PPG is clear that where a local plan contains both strategic and non-strategic policies, the non-strategic policies should be clearly distinguished from the strategic policies. [ID: 61-002-20190315]

Plan paragraph 1.15 sets out that strategic policies are included in criteria 1 and 3 of the Plan. That is noted. However, the Plan sets out Key Development Sites in Plan policy SA01. Plan policies SA02-4 set out requirements for the largest sites (Plan paragraph 5.2). In this regard is the Plan clear in its identification of strategic policies in relation to site allocations?

This is not clear and need to be addressed.

3. Anglian Water has commented that some allocations may not be capable of connecting to the sewerage network immediately without increasing the risk of pollution. How has the Plan dealt with this?

It is essential for the Plan and its evidence base to show that allocations are deliverable. There is no justification for seeking to require applicants to demonstrate they can access sewerage infrastructure at the planning application stage as there is a right to connect and as such this matter needs to be addressed at the plan-making stage.

4. Plan paragraph 1.10 confirms that the District includes a number of made Neighbourhood Plans. What are these and what would be their relationship to this Plan?

HBFB note that the production and updating of Neighbourhood Plans is a voluntary activity. We also note that the robustness of the requirements for preparing and testing housing allocations in Neighbourhood Plans is different, and arguably significantly less robust, especially in relation to viability testing, than that required for allocations in a Local Plan. In light of the significant challenges facing housebuilders, particularly SME developers, in relation to the viability and deliverability of new homes HBFB are very concerned about any reliance being placed on Neighbourhood Plan allocations to deliver new homes in practice.