

HARBOROUGH LOCAL PLAN EXAMINATION STAGE 2 MATTERS, ISSUES AND QUESTIONS IDENTIFIED BY THE INSPECTORS**ON BEHALF OF BLOOR HOMES (RESPONDENT 8317) – MATTER 3 AMOUNT AND DISTRIBUTION OF DEVELOPMENT****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: Spatial Strategy**Question 1. Does the Plan clearly articulate its spatial strategy?**

1. Bloor Homes considers that the Plan spatial strategy is clearly articulated, including site allocations.

Question 2. Is the spatial strategy as set out in Strategic policies DS01 to DS05, and elsewhere in the Plan, an appropriate strategy, taking account of reasonable alternatives, and based on proportionate evidence?

2. Bloor Homes considers that the overall spatial strategy is appropriate. It reflects the settlement hierarchy including the Tier 1 Adjoining Leicester Urban Area, and the necessity to accommodate Leicester's unmet needs in proximity of where it is arising. Please however see the response to Question 3 in respect of the overall development quantum.

Question 3. Have all realistic options for the distribution of development within the District been identified and considered robustly in the formulation of the Plan?

3. Whilst Bloor Homes support the preferred spatial strategy and its distribution of development, as per the responses to Matter 1 and the Regulation 19 response, in the

context of assessing a higher housing growth requirement option, the distribution of additional development to locations in accordance with the preferred spatial strategy could have been considered (i.e. as part of the 'refined' spatial strategy options tested within the SA). Bloor Homes would also note that the capacity of site allocation S2: Land at Beeby Road should be increased to 200 dwellings.

Issue 2: Delivering Homes

Question 1. The Settlement Hierarchy Assessment January 2025 [PPL-NLP1] scores settlements and groups them according to a number of sustainability factors, which provides the settlement hierarchy in the District. That underpins the hierarchy set out in Policy DS01 and AP01. Is the methodology in determining the Plan's settlement hierarchy robust and the outcomes accurate? Is the distribution of development between the tiers of settlements justified and how has it been established?

4. Bloor Homes supports the methodology and outcomes of the Settlement Hierarchy Assessment [PPL-NLP 1]. The assessment recognises (at page 29) that whilst Scraftoft scores as a 'Medium Village' based on its own facilities, it is contiguous with the urban area of Leicester and therefore is classified as Adjoining Leicester Urban Area.
5. It is noted that in relation to the accessibility to the Leicester Urban Area whilst this is not reflected in the quantitative audit scoring system (Appendix 2) it is then reflected in the qualitative assessment commentary (Appendix 3) and the outcome in terms of identifying Scraftoft as a Tier 1 settlement is therefore justified. At Table 4 of the report, it notes that the assessment of settlements adjoining the Leicester Urban Area is locational based rather than based on settlement audit scores (with further commentary at paragraphs 4.5-4.6).

Question 2. Is the proposed distribution of housing supported by the evidence in the Strategic Housing and Economic Land Availability Assessment (SHELAA), [HSG-NLP4 to 6] settlement hierarchy, and SA, and will it lead to an appropriate pattern of housing growth?

6. Overall, Bloor Homes consider the distribution of housing is supported by the evidence. Please see Bloor Homes' response to Matter 1 in respect of the SA and Issue 2, question 1 of this Matter 3 in respect of the settlement hierarchy. In respect of the SHELAA, the assessment predates the resolution to grant planning permission subject to a Section 106 (reference 25/00767/OUT) for site allocation S2: Land at Beeby Road and therefore is partly outdated. Nevertheless, the SHELAA does identify the site as potentially suitable, available, and potentially achievable. The capacity of the site is correctly identified as 200 dwellings, not the proposed allocation figure of 175 dwellings

and Bloor Homes would support the capacity of the allocation being amended in this regard.

Question 3. Would the Plan’s spatial strategy strike the right balance between the need for development across brownfield and greenfield sites and any related impact on housing affordability?

7. Bloor Homes consider it is important for the Plan spatial strategy to accommodate greenfield sites, particularly in the context of sites that can viably accommodate the necessary affordable housing provision, for which the need has been identified as significant within the Harborough Local Housing and Employment Land Evidence (February 2025) [EMP-NLP 5] at pages 4 and 67.
8. Table 1.1 of the Local Plan Viability Report (January 2025) [INF-NLP 3] identifies the variations in viability of the greenfield and brownfield sites, with significant reductions in the proportion brownfield sites can support i.e., high value/greenfield sites can support 40% affordable housing whilst high value/brownfield sites can only support 15%. Whilst the NPPF paragraph 123 states that development strategies should accommodate needs in a way that makes as much use as possible of previously-developed or ‘brownfield’ land, the Framework should be considered as a whole and paragraph 69 in relation to housing supply states the importance of a sufficient amount and variety of land coming forward where it is needed and that the needs of groups with specific housing requirements are addressed, including affordable housing.
9. The need for greenfield land development also reflects the characteristics of the District. The Development Strategy Paper (February 2025) [PRE-NLP 4] at commentary within Appendix E notes that all the housing growth options are likely to have a degree of impact on the natural environment due to the lack of brownfield land in the District.

Question 4. How has the Plan’s aim to accommodate some of Leicester’s unmet housing need been reflected in the Plan’s spatial strategy? Does it strike the right balance between promoting development between the Leicester urban area and the District’s market towns?

10. The Plan spatial strategy, in the context of accommodating Leicester’s unmet housing needs has had regard to the promoting of development within this location. This is reflected in the directing of development to the Tier 1 Adjoining Leicester Urban Area (approximately 20% of the overall housing land supply as per Table 2 of the Plan). It should be recognised that these locations can accommodate both local housing needs and the unmet housing needs of Leicester.

Issue 3: Housing Need and Requirement

Question 1. The Plan area's housing need is calculated using the standard method set out in PPG [ID: 2a-002-20241212] [ID:2a-004-20201216]. That results in a Local Housing Need (LHN) figure for the District of 534 homes per year. The Council in its response to the Panel's PQ 16 confirms that its latest calculation of LHN is in 2022 [HDC2]. The Plan's housing requirement includes an element of LHN plus an allowance for unmet needs in the Leicester City. The Plan's housing requirement is the same as the housing to be delivered by this Plan.

In deriving the Plan's housing requirement from the calculation of LHN, should supply prior to the latest calculation of LHN be taken into account? Given that the PPG explains that the purpose of the affordability adjustment applied in the Standard Method takes account of past delivery would this be a justified approach consistent with national policy? [ID: 2a-011-20241212] [2a-011-20190220].

Question 2. The Panel notes the Council's response to the Panel's PQ16 [HDC2]. If the Panel were to decide that the Plan's housing supply prior to the latest calculation of LHN should be discounted from its housing requirement, what is the implication for the Plan housing requirement?

11. Bloor Homes responds to Questions 1 and 2 together for completeness. Bloor Homes notes the Council's response at HDC2 which states the current approach aligns with the existing evidence base and the timescales of the Leicester City Local Plan.
12. Bloor Homes notes the PPG reference in relation to delivery and the Standard Method. Whilst it is noted this refers to under delivery, it can be assumed that delivery overall is accounted for within the calculation, including oversupply. Should any rebasing of the plan period be considered appropriate to align with the 2022 calculation of local housing need, it would therefore appear that no discounting of the housing requirement with pre-2022 completions would be necessary.
13. As per Bloor Homes' response under Matter 1, Issue 5, Question 5 any adjustments to the housing requirement period for the Plan should also reflect the need to account for an additional plan period year so to be consistent with national planning policy.

Issue 4: Leicester City's Unmet Need

Question 1. The Plan's housing requirement includes an allowance for Leicester City's unmet need until 2036. This is made up of a requirement above LHN of 123 homes per annum 2020-2036 based on evidence in the Housing Distribution Paper (June 2022) [HSG-NLP3]. What is the robust justification for this approach?

Question 2. Should the Plan’s housing requirement include provision for unmet need beyond 2036? Has Leicester City’s unmet need beyond 2026 been quantified through the local plan process? In the absence of robust evidence justifying Leicester City’s capacity, is there robust evidence to support such an approach?

14. Bloor Homes respond to Questions 1 and 2 together for completeness. As per the responses to Matter 1, the approach of accommodating Leicester City’s unmet need up to 2036 is considered appropriate. In relation to unmet needs beyond 2036, whilst this may have not yet been quantified through the local plan process, the Leicester and Leicestershire Authorities Statement of Common Ground relating to Housing Distribution following NPPF and new Standard Method [SCG-NLP 18] does set out early evidence of ongoing unmet needs for Leicester beyond 2036 with updated assessment work referenced in SCG-NLP 18 identifying unmet needs up to 2046 (estimated 8,230 dwellings 2036-2046). It is therefore widely recognised that unmet needs will continue to arise and further flexibility within the housing requirement up to the end of the Plan period of 2041 could serve to help address this.
15. 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 (a contribution of 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 the progress of other relevant local plans. Nevertheless, the evidence identifies that Harborough will need to consider the unmet needs of Leicester beyond 2036.
16. It is noted that the Plan identifies a potential oversupply of 2,142 dwellings at MM7.1 of the latest Schedule of Proposed Modifications [Appendix 1 of HDC 2] equating to 16% of the overall housing requirement. At paragraph 4.14 of the Housing Topic Paper (April 2026) [TPC-NLP 7] the Council states this provides headroom for additional unmet needs. Bloor Homes would note that the Plan growth options considered the application of a 20% to provide flexibility, as detailed at pages 5-7 of the Local Plan Development Strategy Paper (February 2025) [PRE-NLP 4]. Therefore, the current contingency of 16% is below the 20% the Council was envisaging as part of the medium growth option selected, reducing the flexibility to address unmet needs via a buffer approach.

Issue 5: Housing Supply

Question 2. Will the Plan provide a supply of deliverable and/or developable sites and/or broad locations to meet the full housing requirement for the whole of the Plan period?

17. Bloor Homes note that site allocation S2: Land at Beeby Road will form part of the supply of deliverable housing sites upon adoption of the Plan. Please see the responses to Matter 7 in respect of the site-specific circumstances which justify its deliverable status.

Question 3. It is intended that the Plan's housing requirement will be met through new local plan allocations, a small villages requirement, a windfall allowance, commitments (extant planning permissions and neighbourhood plan allocations), and completions since the beginning of the new plan period (1 April 2020). Should the supply prior to the latest calculation of LHN be taken into account?

18. Please see the response to Issue 3, Questions 2 and 3 above. Should the plan period be rebased to 2022 it is considered that no account needs to be taken of pre-2022 completions.

Question 9. Would the Plan deliver an appropriate balance between size of site, given the longer lead in times associated with larger sites? Would the Plan's reliance on large strategic sites, including East of Lutterworth Strategic Development Area (SDA), put delivery at undue risk? And if so, how would this be mitigated?

19. Any risks associated with the delivery of large strategic sites can be partly mitigated via overall development strategy which allocates a mix of housing sites including comparably smaller scale sites, such as site allocation S2: Land at Beeby Road. This is in accordance with paragraph 69 of the NPPF. Providing a buffer in the housing land supply by overproviding against the housing requirement can also provide contingency to account for any risks associated with delays in the delivery large strategic sites.
20. It is noted that the Plan growth options considered the application of a 20% to provide contingency, as detailed at pages 5-7 of the Local Plan Development Strategy Paper (February 2025) [PRE-NLP 4]. The Plan identifies a potential oversupply of 2,142 dwellings at MM7.1 of the latest Schedule of Proposed Modifications [Appendix 1 of HDC 2] equating to 16% of the overall housing requirement. This is below the 20% buffer the Council was envisaging as part of the medium growth option selected. Achieving the 20% by securing additional housing land supply via allocations would therefore provide the level of contingency the Council was initially seeking.