

HBF response to Harborough Local Plan (March 2025) Examination

Matter 7: Locating Development in the Right Place

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 the Reg 19 response that HBF submitted, and concerned we have following the publication of the new 2026 NPPF.

Stage 2 Matters, Issues and Questions (MIQs)

Matter 7: Locating Development in the Right Place

Whether the Plan is justified, effective and consistent with national policy in relation to Locating Development in the Right Place?

Policies AP01, AP03, AP04, SA01, SA02, SA03, SA04, DS01 and DS02

Issue 1: Directing Development to the Right Place

Policy AP01: Development in Settlements

1. Policy AP01 sets out that in addition to sites allocated in Plan policy SA01, development will be permitted within the existing built-up area or settlement limits (Policy AP01 criterion 2), and on land adjoining the existing built-up area settlement limits (Policy AP01 criterion 3), subject to certain criteria. However, does the Plan define these terms in relation to each settlement in the settlement hierarchy? In this regard would the policy be effective in its application?

HBF are unclear how this policy relates and interacts with the new presumption in favour of development within settlements in the NPPF. In reality the planning application process will need to consider both the Local Plan policies and the new NPPF for decision-making purposes. In order to be effective and sound the Plan should explain this reality within the supporting text. HBF notes that the requirement for the Council to set out which policies in the Plan is considers to be in line with the new NPPF and those that are not applies even to Plans being progressed under transitional arrangements.

2. Given the above, how would policy AP01 interact with policy AP03 and AP04 in relation to development in the countryside?

This is unclear.

3. Are the criteria in policy AP01 criterion 2 clear and unambiguous so that it is evident how a decision maker should react to development proposals, and thereby accord with NPPF paragraph 16d?

HBF agree this is currently ambiguous and this needs resolving. However, as we have said previously the Plan needs to be clear how decision-making will be undertaken and the publication of the 2026 NPPF with the default yes to development within settlements is an important factor. This new process should be clearly explained within the Plan.

4. Would policy AP01 criterion 3f provide the necessary clarity for decision makers and applicants through the development management process? Would it be necessary, in the interests of soundness, to include within policy AP01 3f for circumstances where Plan policies most important for determining the application are out of date due to the lack of the five year housing land supply?

As we have said elsewhere in our responses HBF believe that the Plan need to be updated to explain how decision-making will be undertaken in practice, now that the 2026 NPPF has been published with its Development Management national policies. This could also usefully include how decisions are to be made when there is a lack of housing land supply, but HBF would request full consideration is given to any implications stemming from the new 2026 NPPF.

5. Policy AP01 criterion 4 excludes Green Wedges and Areas of Separation site allocations and existing commitments from the definition of land adjoining the existing built-up area/settlement limits. Is this approach justified by the evidence and consistent with national policy?

HBF are unclear how this policy is intended to interact with the new NPPF DM policies.

6. Would Plan policies support development to achieve Made Neighbourhood Plan housing needs?

HBF have expressed our concerned about the viability and deliverability of housing sites advanced through Neighbourhood Plans elsewhere in our responses. These are not repeated here.