

HARBOROUGH LOCAL PLAN EXAMINATION STAGE 2 MATTERS, ISSUES AND QUESTIONS IDENTIFIED BY THE INSPECTORS**ON BEHALF OF BLOOR HOMES (RESPONDENT 8317) – MATTER 8 STRATEGIC POLICIES FOR HOUSING****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 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: Housing Needs (Policy HN01 Housing Need: Affordable Homes)

Question 1. Is policy HN01's requirement for 40% of homes on qualifying developments to be affordable, apart from in 'exceptional circumstances' an appropriate and effective approach to meet identified need for affordable housing? Would the Plan meet that need in full or in part?

1. In relation to meeting affordable housing needs overall, as per comments under Matters 1, 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, equivalent to 67% of the overall Plan housing requirement). 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. Within the Housing Mix and Type Topic Paper (March 2026) [TPC-NLP 8] the Council notes at paragraph 2.3.11 the recent rates of affordable housing delivery, with this not exceeding 20% of all housing completed in recent years. An uplift in the overall housing requirement could therefore serve to address affordable housing needs more fully.

Question 2. Do criteria a) and d) of policy HN01 together make it clear what constitutes 'exceptional circumstances', and what is required in such circumstances?

2. Whilst Bloor Homes do not raise any fundamental issues with the viability of the proportion of affordable housing sought, criterion a) and criterion d) which allow for consideration of a lower level of affordable housing provision in exceptional circumstances (as support by viability assessment work) are welcomed in terms of providing site and scheme specific flexibility and ensuring the policy is effective.
3. This is particularly important in reflecting changed market circumstances since the production of the Plan viability assessment, including matters in relation to the ability of Registered Providers to purchase Section 106 affordable housing on individual sites. This issue is recognised in the Council's Housing Mix and Type Topic Paper (March 2026) [TPC-NLP8] at paragraph 2.3.13. Bloor Homes and the housebuilding industry overall have direct experience of this¹. Bloor Homes would note that the Local Plan Viability Assessment Addendum- Market Conditions (February 2026) [INF-NLP 4] does not explicitly reference this issue in relation to considering updated circumstances.
4. Paragraph 58 of the NPPF (2023) refers to changes in circumstances warranting consideration of viability matters for individual planning applications and it is noted that Policy DM5: Development viability of the NPPF (2026) sets out potential circumstances related to viability and policy compliance (although this list is not exhaustive). This includes consideration of changed site or economic circumstances. To reflect these matters related to changing site or economic market circumstances it may therefore also be appropriate to refer to such exceptional circumstances within the supporting justification text to the policy, and to the Council considering the use of 'cascade mechanisms' within Section 106 agreements to cater for such issues.

Question 5. Is the tenure split in criterion b) of policy HN01 justified?

5. Whilst Bloor Homes do not raise any fundamental issues with the tenure split, as per the Regulation 19 responses further flexibility should be provided to ensure the policy is effective. The tenure split should reflect the latest available evidence, including the Council's housing needs assessment (as per criterion c) of the policy) but also other information relevant to the site and scheme specific circumstances e.g., local market conditions and housing demand specific to the location. To provide this flexibility, it may therefore be appropriate for criterion b) of the policy to instead be included within the supporting justification text, stating that this preferred split reflects the latest evidence at the time of the Plan production, but may be subject to change.

¹ [Uncontracted Section 106 Affordable Homes: October 2025](#)

Issue 1: Housing Needs (Policy HN03 Housing Need: Housing Type and Density)

Question 1. How are the minimum residential density figures in policy HN03 arrived at? Are they justified?

6. Bloor Homes supports the identification of these density standards as a minimum, reflecting that they can be exceeded based on site and scheme specific circumstances. Based on the proposals for site allocation S2: Land at Beeby Road (since the subject of a resolution to grant planning permission in April 2026), the Regulation 19 representations considered that the minimum density for developments elsewhere (outside of Lutterworth and Market Harborough town centres) could be reasonably increased to 35 dwellings per hectare. It is however acknowledged that the 30 dwellings per hectare is a minimum, and if it is not operated as a 'cap' this would allow for site and scheme specific circumstances.

Issue 1: Housing Needs (Policy HN04 Housing Need: Supported and Specialist Housing)

Question 1. Is the rate of at least 10% of dwellings on suitably located residential development of 100 dwellings or more, in criterion 2 of policy HN04, a justified and effective approach to meet identified need for specialist housing for older people? How is this rate arrived at?

7. Bloor Homes do not consider that the rate of 10% has been evidenced. The Council's subsequent Housing Mix and Type Topic Paper (March 2026) [TPC-NLP 8] provides further commentary on the proposed approach.
8. It states this has followed the approach of the adopted Harborough Local Plan Policy H4. The topic paper does not however provide evidence on how successfully this existing policy has been implemented i.e., how many sites have been able to achieve this 10% rate.
9. In relation to viability, the topic paper references the Whole Plan Viability Assessment (January 2025) [INF-NLP 3] but this instead assessed older persons housing as a typology, rather than the 10% rate proposed explicitly, and it acknowledged the viability challenges associated with this accommodation. This could therefore impact upon residential sites subject to the 10% rate.
10. The overall levels of need for such accommodation from the Harborough Local Housing and Employment Land Evidence (February 2025) [EMP-NLP 5] is referenced, but the policy approach does not reflect the fact that these needs could be accommodated by individual specific schemes, rather than via the 10% rate on relevant residential sites.

Issue 1: Housing Needs (Policy HN05 Housing Need: Self and Custom Build Housing)

Question 1. How is demand for self and custom build housing calculated? Will the approach to providing land for self and custom build housing in policy HN05 meet the demand? Is the inclusion of self and custom build housing within new build housing developments a justified way to do this? Is the 40 dwellings (gross) threshold for provision of at least 10% of the total number of dwellings on such developments appropriate, effective and consistent with national policy?

11. Bloor Homes do not consider that the 10% rate has been evidenced. As noted in the Regulation 19 representations, it is considered that this policy requirement would result in the availability of plots exceeding demand.
12. The Council's subsequent Housing Mix and Type Topic Paper (March 2026) [TPC-NLP 8] provides further commentary on the proposed approach. This identifies at paragraph 6.3.10 a demand for 154 plots as of 30th October 2024 with levels of demand for each based period ranging between 18-154 plots since 2019. However, there is no analysis of how many plots would be provided by the 10% rate on relevant sites of 40 dwellings or more to demonstrate that this would not significantly outweigh average levels of demand. In addition, the table at paragraph 6.3.10 demonstrates that planning permissions for self-build plots have been granted without this proposed 10% rate policy being in place, with a notable increase in 2024-2025.
13. It should also be noted that whilst Self Build Registers provide an indicator of demand, they do not necessarily provide information on the ability of entrants to undertake a self or custom build, and where not kept up to date do not always represent an accurate picture of demand. The needs figures should therefore be treated with caution. The PPG (paragraph 003 Reference ID: 67-003-20190722) states data from registers should be reviewed and can be supplemented with the use of existing secondary data sources such as building plot search websites, 'Need-a-Plot' information available from the Self Build Portal and enquiries for building plots from local estate agents.

Question 2. Is it sufficiently clear to users of the Plan what sort of evidence would be helpful to inform consideration of whether there is 'clear evidence of lower demand', under criterion 3 of policy HN05?

14. Bloor Homes do not consider that this is sufficiently clear from the policy or supporting justification text. As per Question 1, the self-build register should not be relied upon solely with other market information also being utilised.

Question 3. Is 18 months a reasonable length of marketing period in criterion 3 of policy HN05?

15. If the 10% requirement is retained Bloor Homes considers that a period of 12 months would be more appropriate, particularly given the scale of the site threshold being 40 dwellings and the likely build out rates of such sites.