

Examination of the Harborough Local Plan 2020-2041

Stage 2 Matters, Issues and Questions (MIQs)

Written Statement by Harborough District Council

MATTER 8: Strategic Policies for Housing

Whether the Plan is justified, effective and consistent with national policy in relation to Strategic Policies for Housing?

Policies HN01, HN02, HN03, HN04, HN05 and HN06

Matter 8, Issue 1: Housing Needs

Policy HN01 Housing Need: Affordable Homes

The Council's response:

Matter 8, Issue 1, Policy HN01 Housing Need: Affordable Homes

Q1. 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. Yes. The requirement for 40% affordable housing on qualifying developments is appropriate and effective.
2. The policy is justified by the Harborough Local Housing and Employment Land Evidence [[EMP-NLP 5](#)], which records an acute affordable housing need and the Local Plan Viability Evidence [[INF-NLP 3](#)], which demonstrates that a district-wide requirement of 40% can generally be sustained alongside the other costs of development - a position subsequently confirmed by the Updated Local Plan Viability Assessment [[HDC 12](#)].
3. As set out in the Housing Mix and Type Topic Paper [[TPC-NLP 8](#)], the policy is projected to meet the identified affordable housing need in part, but not in full.

4. The fact that the policy would not meet the full calculated need does not render it inappropriate or ineffective. The Local Plan Development Strategy Paper [\[PRE-NLP 4\]](#) explains that evidence does not justify increasing the overall housing requirement solely to deliver more affordable housing, while the viability evidence indicates that 40% is the maximum justified general requirement that can be sought without placing the overall delivery of the Plan at undue risk.

Q2. Do criteria a) and d) of policy HN01 together make it clear what constitutes 'exceptional circumstances', and what is required in such circumstances?

5. Yes. The Council considers that criteria a) and d) of Policy HN01, when read together, provide sufficient clarity regarding the circumstances in which departures from the normal policy requirements may be considered and the evidence to justify such an approach.
6. Criterion a) establishes the expectation that affordable housing will be delivered on-site. It makes clear that alternative approaches, such as off-site provision or a financial contribution in lieu, will only be considered where exceptional circumstances can be demonstrated and robustly justified.
7. Criterion d) addresses a separate circumstance, namely where it is robustly demonstrated that provision of the policy-compliant level of affordable housing would render a development unviable. In those circumstances, the policy makes clear that a lower level of affordable housing provision may be considered, subject to the submission of a clear justification supported by an independent viability assessment. The policy also makes clear that the cost of reviewing the viability evidence will be borne by the applicant.
8. The Council therefore considers that the policy clearly identifies both the circumstances in which flexibility may be applied and the supporting evidence that is required. Criterion a) addresses the form in which affordable housing is delivered, whilst criterion d) addresses viability-based reductions in the proportion of affordable housing provision.

Q3. Is the proportion of affordable housing sought viable, both by itself and in combination with other planning requirements in the Plan?

9. Yes. The Plan's 40% affordable housing requirement is supported by the Whole Plan Viability Assessment, January 2025 [\[INF-NLP 3\]](#) which tested

representative typologies across value zones and concluded a 40% district wide target is reasonable given the concentration of allocations in the medium and higher value areas. The Updated Local Plan Viability, September 2026 [[HDC 12](#)] indicates a reduction in infrastructure cost pressures and consequently increased viability headroom. The Plan includes an independent application stage viability review mechanism where full policy compliance cannot be supported on a specific site. Taken together, the viability evidence demonstrates that the 40% target is justified and deliverable in combination with other plan requirements, subject to the proportionate use of the review mechanism on marginal sites.

Q4. Is it clear for users of the Plan, what 'capable of delivering 10 or more homes' means and how this will be assessed?

10. The Council considers that the phrase “capable of delivering 10 or more homes” is clear, effective, and necessary to optimize affordable housing delivery. The phrase refers to any site or parcel of land that has potential to accommodate a residential development of at least 10 dwellings. The explicit purpose of this wording is to ensure that affordable housing requirements are considered based on the development capacity of the site rather than the number of homes proposed by the applicant at a particular point in time. This prevents circumstances where sites are artificially subdivided or brought forward at a lower density to circumvent the affordable housing policy threshold.
11. Based on the current wording, this is assessed on a site-by-site basis through the development management process. To ensure this mechanism is transparent and predictable for users of the Plan, the Council proposes an addition to the supporting text to explain that to determine whether a site is capable of delivering 10 or more homes, the Council will undertake an objective assessment of the land’s capacity at the pre-application stage or application stage. This assessment will have regard to the minimum density standards set out in Policy HN03, the net developable site area, design considerations, and any other physical site constraints.

Q5. Is the tenure split in criterion b) of policy HN01 justified?

12. Yes. The proposed tenure split (about 75% affordable or socially rented, and about 25% affordable home ownership) directly reflects the evidence in the Harborough Local Housing and Employment Land Evidence Report, February

2026 [[EMP-NLP 5](#)], which identifies an annual need of approximately 310 rented affordable homes and 111 affordable home ownership homes (approximately 75/25). The policy appropriately balances evidenced need with viability caveats. In practice, the tenure split provides a reasonable and evidence-based starting point for negotiation and delivery while allowing flexibility to reflect site specific viability and latest evidence.

Q6. Is the viability reassessment approach in criterion e) of policy HN01 appropriate and consistent with national policy? Also, is this criterion effective for schemes 500 or more flats, for example?

13. Policy HN01 establishes a clear, evidence-based starting requirement of 40% affordable housing. That requirement has been tested through the Whole Plan Viability Assessment, January 2025 [[INF-NLP 3](#)] and subsequently reconfirmed by the Updated Local Plan Viability, September 2026 [[HDC 12](#)]. Both recommend the 40% requirement and an upward review mechanism where policy compliant provision cannot be supported at the decision-making stage.
14. The approach accords with national policy that requires plans to make sufficient provision for affordable housing without undermining deliverability. Paragraph 58 of the 2023 NPPF provides that policy compliant applications should be assumed viable, places the onus on an applicant to demonstrate exceptional circumstances and requires viability assessments to follow national guidance. Criterion (e) operates within that framework.
15. There is greater scope for sale values, build costs and development timing to differ materially from assumptions made when permission is granted for strategic schemes above the 500 dwellings threshold. Because these larger developments are commonly delivered across multiple phases and economic cycles, a review mechanism is highly effective and allows the Council to capture market upturns on longer-running schemes without imposing disproportionate requirements on smaller developments.
16. Although the criterion uses the word “houses”, Policy HN01 as a whole consistently refers to “homes”, and the explanatory supporting text in paragraph 6.11 explicitly describes the review mechanism as applying to “larger schemes of 500 dwellings or more”. Read in that context and having regard to the purposes of the mechanism, the threshold relates to the total number of dwellings, irrespective of whether they are houses, flats or a combination of the two. A large, flatted scheme may be phased and exposed

to changes in cost and values in the same way as a large house building scheme. The Council will apply criterion (e) on that basis.

17. No further Main Modification is necessary for soundness. However, AM11.2 in the Schedule of Proposed Modifications amended following Panel Note 2 [[HDC 2](#)] sets out a minor cross-referencing correction. The current text in criterion (e) contains a drafting error referencing criterion (c) which should reference criterion (d). Subject to the factual drafting amendment, it is considered that criterion (e) is clear and effective.

Matter 8, Issue 1: Housing Needs

Policy HN02 Housing Need: Mix of New Homes

The Council's response:

Matter 8, Issue 1, Policy HN02 Housing Need: Mix of New Homes

Q1. Does policy HN02 appropriately address evidenced need for various housing types, tenures and sizes?

18. Yes, Policy HN02 appropriately addresses the evidenced need for different housing types, tenures and sizes in the following evidence:

- Harborough Local Housing and Employment Land Evidence (EMP-NLP 5)
- Leicester and Leicestershire Housing and Economic Needs Assessment, June 2022 [HSG-NLP 2]
- Harborough Local Housing and Employment Land Evidence, 2025 [EMP-NLP 5]
- Harborough Local Plan Viability Assessment, 2025 [INF-NLP 3]
- TPC-NLP 8: [Housing Mix and Type Topic Paper March 2026](#)

Q2. Is Table 10 of the Plan an appropriate starting point for considering the size of homes needed across different tenures?

19. Yes. Table 10 of the Plan is an appropriate starting point for considering the size of homes needed across different tenures as discussed in TPC-NLP 8: [Housing Mix and Type Topic Paper March 2026](#).

20. The Housing and Economic Needs Assessment (HENA) (HSG-NLP 2) published in June 2022 modelled outputs of need by dwelling type, size and tenure across Leicester and Leicestershire. The Harborough Local Housing and Employment Land Evidence (EMP-NLP 5) provides updates to the local evidence that underpins Policy HN02, assessing the need for different types, tenures and sizes of homes.
21. The demographic trends for Harborough have significant implications for the design and typology of future housing provision within the district, therefore based on this evidence, the most appropriate housing mix is shown in table 10.

Q3. Is the approach to accessible and adaptable homes in criteria 2 and 3 of policy HN02 flexible enough to take account of site constraints and development viability considerations?

22. Yes, criteria 2 and 3 are flexible enough as discussed in TPC-NLP 8: [Housing Mix and Type Topic Paper March 2026](#)
23. Aspinall Verdi produced a Whole Plan Viability Assessment of the Local Plan [INF-NLP 3]. This assessment incorporated housing type, tenure and Building Regulations M4 categories into its development cost allowances in addition to consideration of other factors such as site constraints. Based on this evidence, Policy HN02 incorporates flexibility for site constraints and viability considerations.

Q4. Are criteria 2 and 3 of policy HN02 consistent with national policy?

24. Yes, criteria 2 and 3 are consistent with national policy as discussed in TPC-NLP 8: [Housing Mix and Type Topic Paper March 2026](#).
25. The evidence acknowledges the Government's intention to make the M4(2) accessibility standard mandatory for all new build homes. Having regard to prospective changes in Building Regulations, the Housing and Employment Land Evidence supports a policy requiring new dwellings to meet M4(2) accessible and adaptable standards, where suitable level access can be achieved.

Matter 8, Issue 1: Housing Needs

Policy HN03 Housing Need: Housing Type and Density

Q1. How are the minimum residential density figures in policy HN03 arrived at? Are they justified?

Q2. For exceptions in policy HN03, is it clear enough for users of the Plan how 'availability of public transport and other services and facilities' informs calculation of lower density?

The Council's response:

Matter 8, Issue 1, Policy HN03 Housing Need: Housing Type and Density

26. As indicated in the Housing Mix and Type Topic Paper [[TPC-NLP 8](#)], the minimum residential densities in Policy HN03 are derived principally from the Leicester and Leicestershire Strategic Housing and Economic Land Availability Assessment Joint Methodology Paper [[HSG-NLP 1](#)]. That methodology, agreed by the local planning authorities across the Housing Market Area, establishes the use of 40dph to assess site capacity within selected centres and 30dph for all other sites. Policy HN03 carries these established assumptions forward into the Plan as minimum density standards.
27. The distinction between standards is supported by local evidence. The Settlement Hierarchy Assessment [[PPL-NLP 1](#)] identifies six tiers of settlements. Lutterworth and Market Harborough are classified at the upper end of the hierarchy as Market Towns. They possess recognized town centres with the broadest range of higher order services, facilities, employment opportunities and public transport connections. A 40dph minimum in these centres directly reflects their greater accessibility and capacity to support a more compact, sustainable form of development. The 30dph minimum elsewhere recognizes the generally lower density character of the remainder of the District while still securing an efficient use of land.
28. The Harborough Local Housing and Employment Land Evidence [[EMP-NLP 5](#)] provides a further check against local circumstances. It identifies a housing stock in which almost half of homes are detached, with relatively few flats outside Market Harborough, and a prevalence of larger, less dense dwelling forms, particularly in the rural area and larger villages. On the other hand, smaller and denser forms are more evident in Market Harborough and, to a lesser extent, Lutterworth. The two density standards are therefore proportionate benchmarks which respond to the District's settlement pattern

and existing built form; they do not assume that the same density is appropriate in every location.

29. The reference to the availability of public transport and other services and facilities reflects the expectation that higher density development should be directed towards the most accessible and sustainable locations. Conversely, where a site displays lower levels of accessibility, this may serve as a material consideration in determining whether a lower density is justified.
30. The Council accepts that while the present wording identifies the relevant considerations, it could explain more clearly how they are to be applied during the development management process.
31. To ensure the exception criteria are unambiguous and consistently applied, the Council proposes the following additional supporting text to Policy HN03:

Para 6.20 The Council will expect a minimum residential density of 40 dwellings per hectare within Lutterworth and Market Harborough town centres and 30 dwellings per hectare elsewhere. A lower density will only be permitted where proportionate site-specific evidence demonstrates that it is necessary having regard to the character of the area and the site's accessibility to public transport and other services and facilities. The accessibility assessment should have regard to walking and cycling distances and routes, the distance to public transport stops or hubs, service frequency, capacity and destinations served, and any committed improvements. Any lower density must represent the optimum reasonable use of the site.

Matter 8, Issue 1: Housing Needs

Policy HN04 Housing Need: Supported and Specialist Housing

The Council's response:

Matter 8, Issue 1, Policy HN04 Housing Need: Supported and Specialist Housing

Q1. 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?

32. Yes, the rate of at least 10 % of dwellings on suitably located residential developments of 100 dwellings or more, in criterion 2 of policy HN04 is a

justified and effective approach to meet the identified need for specialist housing for older people. Paragraph 5.3.14 of the [Housing Mix and Type topic paper](#) [TPC-NLP8] references the [Harborough Local Housing and Employment Land Evidence](#) [EMP-NLP5] and states that *“the analysis within the Harborough Local Housing and Employment Land Evidence identifies a requirement for 2,697 additional units of specialist accommodation in Harborough District, disaggregated into a requirement for 1,249 homes with support (retirement/sheltered), 629 homes with care (e.g. extra care) and 819 extra nursing and residential care bedspaces over the plan period.”* Paragraph 5.3.18 of the [Housing Mix and Type topic paper](#) [TPC-NLP8] conducts high level analysis that concludes *“a total of 13 site allocations should make a contribution to some form of specialised accommodation in accordance with Policy HN04 that potentially delivers a combined predicted yield of approximately 600 over the plan period.”* There is a clear need for this type of accommodation and it is demonstrated that this rate of provision on new developments would make a notable contribution towards meeting this need.

33. Further to this, para 5.3.13 of the [Housing Mix and Type topic paper](#) [TPC-NLP8] states that *“Policy HN04 was informed by the Whole Plan Viability Assessment carried out by Aspinall Verdi in January 2025, which tested older persons’ typologies (INF-NLP 3). The evidence identified challenging viability associated with older persons accommodation. However, sensitivity testing showed some typologies to be viable, and the consultant’s advice at paragraph 6.55 noted that viability may be improved subject to specific design and location within the District.”* [Updated whole plan viability](#) [HDC11] evidence published in September 2026 found that *“Whilst we reiterate that our January 2025 WPVA illustrated the plan to be viable and deliverable, the updated position set out in the September 2026 IDP indicates there is further viability headroom”*

34. The rate is consistent with Policy H4 of the [adopted Local Plan](#), and will provide the highest quantum of specialist housing for older people to meet a demonstrable need while remaining viable.

Q2. Is it clear enough for users of the Plan what sort of factors can make a location 'suitable' for specialist housing for older people, in criterion 2 of policy in HN04?

35. Yes, the policy includes supporting text that provides clarity to the meaning of 'suitable location'. This is set out in paragraph 6.22 of the [submitted Local Plan](#) [S-NLP1] *“Developments should offer a suitable location that provides*

easy access to services, community and support facilities, including health facilities and public transport.”

36. Further to this, [NPPF 2026](#) which would be used for decision making, provides further clarity about access to services which are appropriate to the needs of residents and users of specialist housing for older people at policy HO9 1(a), stating

“a. Specialist housing for older or disabled people:

i. Being located where residents will be able to access frequently-used services easily and safely by walking, wheeling (including mobility scooters) and by public or on-site transport services; including through facilities provided as part of the scheme;”

Matter 8, Issue 1: Housing Needs

Policy HN05 Housing Need: Self and Custom Build Housing

The Council’s response:

Matter 8, Issue 1, Policy HN05 Housing Need: Self and Custom Build Housing

Q1. 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?

37. Chapter 6 of the [Housing Mix and Type topic paper](#) [TPC-NLP8] states that the demand for self and custom build housing is determined by the demand arising from the Self and Custom build register. This demand is set out in the [AMR 2024/25](#) [S-NLP8] and an updated position can be viewed on the [Council’s website](#) pending publication of the AMR 2025/26. The demand from the self and custom build register is also reviewed in the [Harborough Housing and Employment Land evidence](#) [EMP-NLP5] and this report also reviews secondary data. Demand for the plan period has been calculated by rolling forward demand from the Self and Custom build register. This can be viewed in Appendix A of the [Housing Mix and Type topic paper](#) [TPC-NLP8].

38. Appendix A of the [Housing Mix and Type topic paper](#) [TPC-NLP8] sets out the justification for the threshold required to provide for self and custom build plots

on large sites. It demonstrates that if all the proposed allocations in the plan provide 10% of their plots as self and custom build housing then the demand projected for the plan period (rolling forward demand from self and custom build register) would be met. The Harborough Local Plan identifies a number of sites with a range of site sizes for the delivery of housing over the length of the plan period which will help to ensure choice of location for potential self and custom builders and also stagger the availability of such sites across the plan period.

39. This approach does not account for windfall contributions which may also come forward and contribute to meeting the demand while also allowing flexibility and choice in the market.
40. Setting a percentage policy on sites of 40 dwellings or more ensures that delivery of self and custom build will not be entirely reliant on windfall contributions, or on large sites which can take time to come forward. The Harborough Local Plan identifies a number of sites with a range of site sizes for the delivery of housing over the length of the plan period which will help to ensure choice of location for potential self and custom builders and also stagger the availability of such sites across the plan period. As set out in para 6.3.7 of the [Housing Mix and Type topic paper](#) [TPC-NLP8], the [Harborough Housing and Employment Land evidence](#) [EMP-NLP5] suggests a potential approach to meeting the need from the Self and Custom build register to be *“Setting out a specific requirement on the proportion of custom- and self-build development expected on larger sites, such as an expectation of 10% provision on sites of over 40 dwellings, with a cascade mechanism should clear interest not be forthcoming;”*. This is also an approach used in other Local Plans across the country and is considered to be justified.
41. Further to this, Table 3.1 of the [Viability Assessment](#) [INF-NLP3] states that *“The provision of Custom Self-build (CSB) plots is a deliverability rather than viability matter. In viability terms, we consider the impact of CSB plots to be neutral and within the ‘buffer’ of the appraisal(s).”* [Updated whole plan viability](#) [HDC11] evidence published in September 2026 found that *“Whilst we reiterate that our January 2025 WPVA illustrated the plan to be viable and deliverable, the updated position set out in the September 2026 IDP indicates there is further viability headroom”*

Q2. 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?

42. Yes. Clear evidence of lower demand would relate to the Self and Custom build register. Monitoring of this is published annually in the AMR but also on the [Council's website](#) ahead of the AMR publication. Paragraphs 6.24 and 6.25 of the Local Plan refer to the self-build register being the main source of evidence of demand.

Q3. Is 18 months a reasonable length of marketing period in criterion 3 of policy HN05?

43. 18 months is considered a reasonable length of marketing period to enable prospective self and custom builders to ensure they are in a position to take on a project before the opportunity is removed by the marketing period clause. This will allow for prospective self or custom builders to assemble finances, legal and any planning or building advice required to enable them to take on the project while the plot is being marketed. By allowing this time, it provides the best possible opportunity for self and custom build projects to be delivered, and therefore meeting demand arising from the self and custom build register.

Q4. Is it clear who is responsible for producing a design code, as required in criterion 6 of policy HN05, and the process for this?

44. Yes. Criterion 5 of policy HN05 states "...the applicant must clearly demonstrate, secured via a legal agreement, that each plot will be provided with: d) a plot passport and design code."

Matter 8, Issue 1: Housing Needs

Policy HN06 Housing Need: Gypsy and Traveller and Travelling Show people Accommodation

The Council's response:

Matter 8, Issue 1, Policy HN06 Housing Need: Gypsy and Traveller and Travelling Show people Accommodation

Q1. Is there robust evidence of the need for gypsies, travellers and travelling show people's accommodation over the Plan period?

45. Yes, there is robust evidence of the need for gypsies, travellers and travelling showpeople contained within the [Gypsy and Traveller Accommodation Assessment](#) [HSG-NLP7] completed by ORS and explained in the [Housing Mix and Type topic paper](#) [TPC-NLP8].

46. As set out in para 7.3.5 of the [Housing Mix and Type topic paper](#) [TPC-NLP8],

“Opinion Research Services (ORS) were commissioned to prepare a Gypsy and Traveller Accommodation Assessment (HSG-NLP 9) to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople Accommodation in Harborough district.

47. Para 7.3.12-7.3.16 of the [Housing Mix and Type topic paper](#) [TPC-NLP8] provides an update to the figures, reflecting changes to the PPTS in December 2024, and subsequently Annex B of NPPF2026 which altered the planning definition of Traveller. The updated figures are:

Need for Gypsy and Traveller households broken down by five-year periods

Status	24-28	29-33	34-38	39-41	TOTAL
Meet Planning Definition	18	3	1	2	24
Undetermined	48	9	10	10	77
TOTAL	66	12	11	12	101

Need for Travelling Showpeople households broken down by five-year periods

Status	24-28	29-33	34-38	39-41	TOTAL
Meet Planning Definition	58	6	8	5	77
Undetermined	26	4	4	3	37
TOTAL	84	10	12	8	114

Q2. Does the Plan identify sufficient locations to meet the accommodation needs of gypsies, travellers and travelling show people, within the planning definition of travellers, for the following periods after adoption of the Plan: a) the first 5 years, b) years 6-10 and c) years 11-15? Is the Plan's approach for these periods consistent with national policy, and justified?

48. Table 7 and 8 of the [Housing Mix and Type topic paper](#) [TPC-NLP8] set out an updated delivery trajectory for Gypsy and Traveller pitches and Travelling Showpeople plots.

49. Below are Tables 7 and 8 from the topic paper with a further box underneath setting out the needs for traveller pitches also broken down by 5-year periods.

Table 7 Potential number of Gypsy and Traveller pitches per delivery period

Site ID	Location	1-5 years	6-10 years	11-15 years	Total
GT1b	Bonehams Lane	0	12	0	12
GT2ab	Mere Farm	8	0	0	8
GT7	Smithfields (formerly Dunton Barn)	0	1	0	1
GT8	Spinney View Farm	6	0	0	6
GT10	Walkers Stables Expansion	5	0	0	5
GT12	Wells Close, Woodway Lane	3	0	0	3
ADD1	Land at Moorbarns Lane	0	0	10	10
ADD2	Dunton Bassett Quarry	0	0	8	8
Total		22	13	18	53

	1-5 years	6-10 years	11-15 years	16+ years	Total
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Need for gypsy and traveller pitches that meet planning definition	18	3	1	2	24
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Table 8 Potential number of Travelling Showpeople plots per delivery period

Site ID	Location				
		1-5 years	6-10 years	11-15 years	Total
8631	Land South of Gartree Road	0	0	36	36
12227	Land at Mere Lane, Magna Park	0	21	0	21
TSP2a	Fairacres Caravan Site	9	0	0	9
TSP2b	Stanley Way	6	0	0	6
TSP3	Golf Course Rise	7	0	0	7
TSP5	Land at James Bond Caravan Park	7	0	0	7
Total		29	21	36	86

	1-5 years	6-10 years	11-15 years	16+ years	Total
Need for travelling showpeople plots that meet planning definition	58	6	8	5	77

50. Since the publication of the topic paper, we have received further information regarding the James Bond Travelling Showpeople site. The site has been brought forward as standard mobile homes as it had an open permission and so this site can no longer form part of the supply of Travelling Showpeople plots. An updated 'Table 8' is set out below.

Site ID	Location				
		1-5 years	6-10 years	11-15 years	Total
8631	Land South of Gartree Road	0	0	36	36
12227	Land at Mere Lane, Magna Park	0	21	0	21
TSP2a	Fairacres Caravan Site	9	0	0	9
TSP2b	Stanley Way	6	0	0	6
TSP3	Golf Course Rise	7	0	0	7
~~TSP5~~	~~Land at James Bond Caravan Park~~	~~7~~	~~0~~	~~0~~	~~7~~
Total		29-22	21	36	86-79

51. Ongoing discussions with site promoters have demonstrated that the site allocations for Travelling Showpeople at SA02 and MP2 will not be in a

position to contribute to meeting the identified needs for Travelling Showpeople until the later stages of the plan period. Further to this some of the delivery timescales have been amended since the publication of the site assessment work [HSG-NLP7] as a result of representations submitted at Regulation 19. Site specific detail is provided in Appendix B of the [Housing Mix and Type topic paper](#) [TPC-NLP8].

52. A concerted and extended site search and assessment process was conducted throughout the production of the plan. This included a comprehensive call for sites and site identification study [HSG-NLP 7], and a subsequent addendum [HSG-NLP 8] to evaluate additional opportunities. This process enabled the Plan to identify and allocate sufficient provision to meet the needs of Travellers over the plan period.
53. No available, suitable and deliverable sites were identified that could meet the assessed need for Travelling Showpeople plots in the early part of the plan period. However, the Plan instead makes provision for that need as part of strategic allocations expected to deliver in the later parts of the plan period, supplemented by a criteria-based policy which provides a positive framework for additional suitable windfall proposals. The Council therefore considers the approach justified by proportionate evidence, the extensive site search process and the absence of suitable, deliverable alternatives in the first five years following adoption. It provides a reasonable framework for meeting the assessed need for Travelling Showpeople over the Plan period. Nevertheless, insofar as the Plan does not identify a supply of specific deliverable Travelling Showpeople sites for the first five years following adoption, it is not fully consistent with the objective in PPTS 2023. The inconsistency concerns the timing of identified provision for Travelling Showpeople, rather than a failure to provide for the assessed need over the Plan period as a whole.

Q3. Does criterion 4c) of policy HN06 articulate a justifiable and effective approach to locational sustainability of sites? Is the distribution of Gypsy & Traveller and Travelling Show people accommodation locations in the Plan justified?

54. Criterion 4c) permits development where the sites will be in a sustainable location, in reasonable proximity to a 'small village' or above as classified in the settlement hierarchy. This is considered to be a justifiable and effective approach to locational sustainability of sites as it provides flexibility for development across the whole district at locations considered to be

sustainable for the location of residential development, and with access to services.

55. The distribution of sites is considered justified. While the majority of the allocated sites are located in the west of the district, this is due to being where the needs have arisen from. The [Gypsy and Traveller Accommodation Assessment](#) [HSG-NLP7] states that the majority of the needs for both Gypsies and Travellers and Travelling Showpeople are from concealed/doubled up/overcrowded households and teenagers. The sites allocated in the plan were also driven by the availability of sites following a concerted and extended site search and assessment process that was conducted throughout the production of the plan. This included a comprehensive call for sites and site identification study[\[HSG-NLP7\]](#), and a subsequent addendum[\[HSG-NLP8\]](#) to evaluate additional opportunities.

Q4. Is there robust evidence of site availability, capacity and accessibility, for the Gypsy & Traveller and Travelling Show people accommodation provision in the Plan to be deliverable?

56. Yes, the report by Three Dragons, the [Gypsy and Traveller and Travelling Showpeople Site Assessment 2024](#) [HSG-NLP 7] completed a thorough site assessment. The site assessment reviewed 199 sites and a further 2 sites in the addendum [Gypsy and Traveller and Travelling Showpeople Site Assessment Addendum – Additional Sites Aug 2025](#) [HSG-NLP 8]. Sites were drawn from a variety of sources including Brownfield Land Register, existing Traveller sites and allocations, public sector owned land, [SHELAA \(2021 & 2024\)](#) [HSG-NLP4] and land for sale (Table 5.1 HSG-NLP 7).
57. The assessment was undertaken in three stages – Stage 1 Site availability, Stage 2 Showstoppers and Stage 3 availability, suitability & achievability (see Chapter 4 HSG-NLP 7). The three assessment stages provide robust evidence (including checks with landowners, site visits and testing sites against a range of criteria) to support the assessment of site availability, capacity and accessibility, with Chapter 5 (HSG-NLP 7) and Chapter 2 (HSG-NLP 8) setting out a summary of the assessments and detailed site assessments for Stages 2 & 3 within Appendix D of HSG-NLP 7 and Appendix A of HSG-NLP 8. The assessments conclude with recommendations to take forward sites into the Plan as being available, suitable and achievable/deliverable.

58. Further information can be found in responses to Matter 7, Issue 2, Question 7 in relation to SA02 Land South of Gartree Road SDA and MP2 Land at Mere Lane, Magna Park.

Q5. Does the Plan make appropriate provision for transit sites?

59. The plan does not make provision for transit sites. This is in line with recommendations from the [Gypsy and Traveller Accommodation Assessment](#) [HSG-NLP7], which made conclusions with regard to transit sites in paragraphs 7.53-7.61. The GTAA concluded that an ongoing review of the evidence base relating to encampments should continue and be completed on a Leicestershire-wide basis before identifying potential sites. Therefore, it would not be appropriate for this Plan to make provision which might not be well located in order to meet needs

Q6. Is it sufficiently clear for users of the Plan what the design guidelines in criterion 4d) of policy HN06 are?

60. Current good practice design guidelines are set out in chapter 14 of [NPPF2026](#). Policy DP3 (4) of NPPF 2026 refers to the Design and Placemaking planning practice guidance that should be used in the absence of locally produced design policies. This would be used in conjunction with DM01 of the Harborough Local Plan that also sets out design requirements for development in the District.