

HARBOROUGH DISTRICT LOCAL PLAN EXAMINATION

MATTER 8: Strategic Policies for Housing - Issue 1: Housing Needs

Hearing Statement Respondent 7271 – Lucy Tankard

Policy HN06 Housing Need: Gypsy and Traveller (G&T) and Travelling Showpeople (TSP) Accommodation

1. Introduction

- 1.1. I am participating in relation to Matter 8, Issue 1 insofar as it relates to Policy HN06 – G&T and TSP.
- 1.2. My representations at Regulation 19 stage raised concerns about the evidence supporting the Plan's approach to G&T and TSP provision, including the adequacy of existing provision, the selection and distribution of sites, cumulative geographical consequences and the consideration of reasonable alternatives.
- 1.3. I have reviewed the Panel's Matters, Issues and Questions (MIQs) against evidence submitted and issues raised in my representations. I have limited this statement to the points that remain material to the Panel's MIQs.
- 1.4. I am not seeking to establish an alternative "correct" level of need or to propose alternative site(s). *My concern* is whether the Council has demonstrated a sufficiently robust and transparent evidential chain from identified need, through existing supply and site assessment, to the final allocations made in Policy HN06.
- 1.5. Where this statement includes questions labelled "Question for the Council", these are my own questions arising from the evidence and matters under examination; they are not quotations from the Inspectors' published Matters, Issues and Questions (MIQs).

2. Panel Question 1 — Is there robust evidence of need?

Evidence base reliability and reconciliation

- 2.1. The starting point for this question is the Council's evidence of need and the existing G&T and TSP supply against which that need is calculated.
- 2.2. I am not seeking to substitute an alternative calculation of need for the Council's. The issue is whether the evidence base is sufficiently reliable, current and internally reconciled for the Inspectors to be satisfied that the identified need, and consequently the provision proposed in Policy HN06, are robust.
- 2.3. The evidence before the Examination contains differences between the Council's and its consultants' records of existing provision. For example, the November 2024 Three Dragons Site Assessment records 105 G&T pitches, whereas the 2024 ORS GTAA records 89 authorised pitches plus one unauthorised pitch. There are also differences in the recorded TSP provision. The issue therefore is not simply one of reconciling headline totals, but understanding what existing provision is, what constitutes effective supply, and what has actually been counted in the assessment of need.
- 2.4. The Mere Farm/Mere Lane cluster provides a specific example of this wider reconciliation issue. The evidence contains different figures for provision in this location, including 43 pitches in the 2024 GTAA, 54 in the 2024 Site Assessment and 47 permanent, approved pitches in the Council's current position. These figures should not be treated as representing the whole evidence discrepancy, but the Council should be able to explain what each figure represents and how they reconcile.
- 2.5. The Examination should also be able to understand how the 16 vacant/uninhabitable pitches at Mere Farm — comprising 8 vacant and 8 derelict pitches — have been treated in the assessment of existing supply, including how the GTAA's recommendation that the Council consider bringing them back into use has been addressed.

Question for the Council: *Can it provide a single, authoritative and current position on existing G&T and TSP supply, explaining how the differing figures have been reconciled and how permanent/transit, occupied/vacant, available/unavailable and implemented/unimplemented provision has been treated in calculating existing and residual need?*

- 2.6. This matters because an unexplained difference in the underlying supply position could affect the residual need which Policy HN06 is seeking to address and, consequently, the justification for the scale and composition of the proposed allocations.

3. Panel Question 2 — Are sufficient locations identified for years 1–5, 6–10 and 11–15?

Stage 3 → final allocations

- 3.1. The evidence establishes a process involving site assessment, a Stage 3 pool and subsequent final allocations. However, the important question for the examination is what happened between those stages.
- 3.2. The evidence identifies **13 sites at Stage 3**, but the submitted Plan contains a smaller number of final allocations.
- 3.3. The key issue therefore is not simply whether the Council assessed sites. It is whether the Council can demonstrate the planning reasoning and evidence by which the Stage 3 sites were translated into the final allocation package. This distinction is recognised elsewhere in the Council's own site-selection methodology for general housing and employment, which separates the identification and assessment of a pool of sites from the subsequent identification of preferred allocation sites and final site-selection recommendations.
- 3.4. This is relevant to the Panel's question about whether sufficient locations have been identified over the three periods identified by the Panel. It is also relevant to whether the final allocation package is based on a transparent and evidenced planning judgement.

Question for the Council *What happened between the 13 Stage 3 sites and the final HN06 allocations, and where is the evidence of the planning reasoning and site-selection judgement that led from the Stage 3 pool to the final allocation package?*

- 3.5. I would also ask the Council to explain how the resulting provision relates progressively to the Panel's 1–5, 6–10 and 11–15-year periods.
- 3.6. I am not suggesting Stage 3 sites should all necessarily have been allocated. The question is whether the Council can demonstrate why the sites it selected were considered sufficient, why other suitable sites were not required, and where that final selection judgement is evidenced.

4. Panel Question 3 — Is the locational-sustainability approach and distribution justified?

Geographical distribution and cumulative consequences

- 4.1. This is a principal concern arising from my Regulation 19 representation.
- 4.2. The issue is not simply whether there are “too many” G&T or TSP sites in a particular part of the district. It is whether the resulting concentration of provision is justified by the Council's evidence and planning judgement, having regard to its geographical distribution and cumulative consequences.
- 4.3. The more fundamental question is whether **geographical distribution and cumulative consequences of the emerging pattern of provision formed part of the Council's planning judgement when it made its final allocation decisions.**
- 4.4. The site assessment process can establish whether individual sites are suitable against particular criteria. That does not necessarily demonstrate that the overall distribution of provision is justified.
- 4.5. The Panel's question therefore provides an opportunity to establish whether the Council considered the Plan's provision as a geographical package, including the consequences of concentrating provision in particular locations, when moving from the Stage 3 pool to the final allocations.

Question for the Council *What evidence demonstrates that geographical distribution and cumulative consequences were expressly considered as part of the Council's final planning judgement when selecting the HN06 allocations?*

- 4.6. If distribution was considered, I would ask the Council to identify where that consideration is evidenced.
- 4.7. If it was not considered separately, the Inspector may need to consider whether the individual site assessment process alone provides sufficient justification for the resulting geographical pattern of provision.
- 4.8. Former H6(5)(b) and (c) — where are their functions now secured?
The previous Policy H6 included specific criteria concerning the location and scale of G&T sites.
H6(5)(b) required a site to be within safe walking distance of a settlement and to have access to a range of services, including health and education provision.
H6(5)(c) required the size of a site to reflect the scale of the nearest settlement, its local services and infrastructure.

These criteria were capable of having substantive effects on individual planning decisions. As a recent reference, the Council's February 2026 assessment of application 25/01339/FUL applied the two criteria separately. It considered the site's walking relationship to Claybrooke Parva, the absence of a footway and the resulting reliance on private vehicles under 5(b), while separately considering the relationship between the proposed nine pitches and the scale of the nearest settlement under 5(c).

The submitted HN06 no longer contains these specific criteria.

Questions for the Council

H6(5)(b) Following removal of former H6(5)(b), where is the function of its specific safe-walking-distance and access-to-services test now secured within HN06 and the wider submitted Plan?

H6(5)(c) Following removal of former H6(5)(c), where is the function of its locally expressed requirement concerning the scale of provision in relation to the nearest settlement, its services and infrastructure now secured within HN06 and the wider submitted Plan?

If the Council cannot demonstrate that these functions are adequately secured elsewhere, what justification does it give for their removal rather than retaining equivalent safeguards within HN06?

4.9. The question is not whether the former wording should be reinstated for its own sake. It is whether the submitted Plan adequately addresses the planning functions previously provided by those criteria. If those functions are not otherwise adequately secured, the Council should explain why equivalent safeguards are not required within HN06.

This is particularly relevant to the locational-sustainability and distribution question because individual site assessment does not necessarily demonstrate that the Plan's overall policy framework adequately addresses accessibility, relationships with settlements, scale of provision, and local service and infrastructure considerations.

5. Panel Question 4 — Is there robust evidence of site availability, capacity and accessibility to make provision deliverable?

Existing supply, capacity and the Mere Lane allocation

5.1. The Site Assessment provides evidence concerning individual site suitability and estimated capacity. However, the Plan's supply position also depends on understanding what existing and proposed provision actually represents.

5.2. This is particularly relevant to the **Mere Lane allocation of 8 pitches**.

5.3. The question is not whether eight pitches could theoretically be accommodated. The question is what the eight-pitch allocation represents within the Council's overall supply calculation and whether those eight pitches are genuinely additional provision against the identified need.

5.4. The Council should therefore be able to explain the relationship between:

- existing authorised provision;
- occupied and vacant/unimplemented provision;
- existing planning permissions;
- proposed allocations; and
- the capacity attributed to those allocations.

Question for the Council *Can the Council demonstrate that the capacity attributed to the HN06 allocations is genuinely available and deliverable, and specifically explain what the 8-pitch Mere Lane allocation represents within the Council's overall supply calculation?*

5.5. I consider this relevant to both the robustness of the supply evidence and the Panel's question about whether sufficient locations have actually been identified.

5.6. I am not asking the Inspector to determine the capacity of the site independently. I am asking the Council to demonstrate the evidential basis for the capacity which it relies upon.

6. Panel Question 5 — Does the Plan make appropriate provision for transit sites?

Change from transit to permanent provision

6.1. The former transit provision associated with **23/00912/FUL** is relevant to this question because the planning position changed from transit provision to permanent pitches.

6.2. The issue is not to suggest where the Council should provide a transit site. Rather, it is whether the change in the nature of the provision has been properly reflected in the Council's evidence of supply, future need and remaining transit provision.

6.3. The later factual position is also relevant: the former transit site remains unoccupied and has been treated by Enforcement as one plot.

6.4. Leicestershire County Council has referred to a countywide approach to transit provision, including the need for cooperation between the Leicestershire authorities to identify 1–2 strategically placed transit sites, broadly in the north and south of the county. This provides relevant wider context to the Panel's question about whether the Plan makes appropriate provision for transit sites.

Question for the Council *How has the change from transit provision to permanent provision at 23/00912/FUL been reflected in the Council's assessment of existing supply, future need and the remaining requirement for transit provision, including in the context of the wider countywide approach to strategically located transit provision?*

6.5. In particular, I would ask the Council to explain whether the change resulted in any loss or alteration of transit capacity, and how this has been considered alongside the wider countywide approach to identifying strategically located transit provision, including the broad north/south approach referred to by Leicestershire County Council.

6.6. I am not proposing a particular solution or location. The point is to establish whether the Plan's evidence adequately accounts for the consequences of the change and its relationship with the wider countywide approach to transit provision.

7. Panel Question 6 — Are the HN06 design guidelines sufficiently clear?

Criterion 4(d) — “current good practice design guidelines”

7.1. Policy HN06 criterion 4(d) refers to development being in accordance with current good practice design guidelines. This raises a question as to what guidance the Council intends applicants and decision-makers to use when applying this criterion.

7.2. The previous Government guidance on the design of sites for Gypsies and Travellers provided a recognised framework for matters such as site layout, scale, integration with the surrounding area and relationship with neighbouring communities, but that guidance was withdrawn in 2015. I therefore do not assume that it remains current national policy.

Question for the Council: *What current national or local design guidance does the Council intend criterion 4(d) of HN06 to refer to, and where is that guidance identified for applicants and decision-makers?*

7.3. If no specific national or local guidance is intended, the Council should explain how compliance with the reference to “current good practice design guidelines” can be assessed consistently and objectively through the development-management process.

Follow-up Question for the Council: *Does the Council consider that criterion 4(d), as currently worded, provides sufficient clarity and an effective basis for decision-making without identified supporting design guidance?*

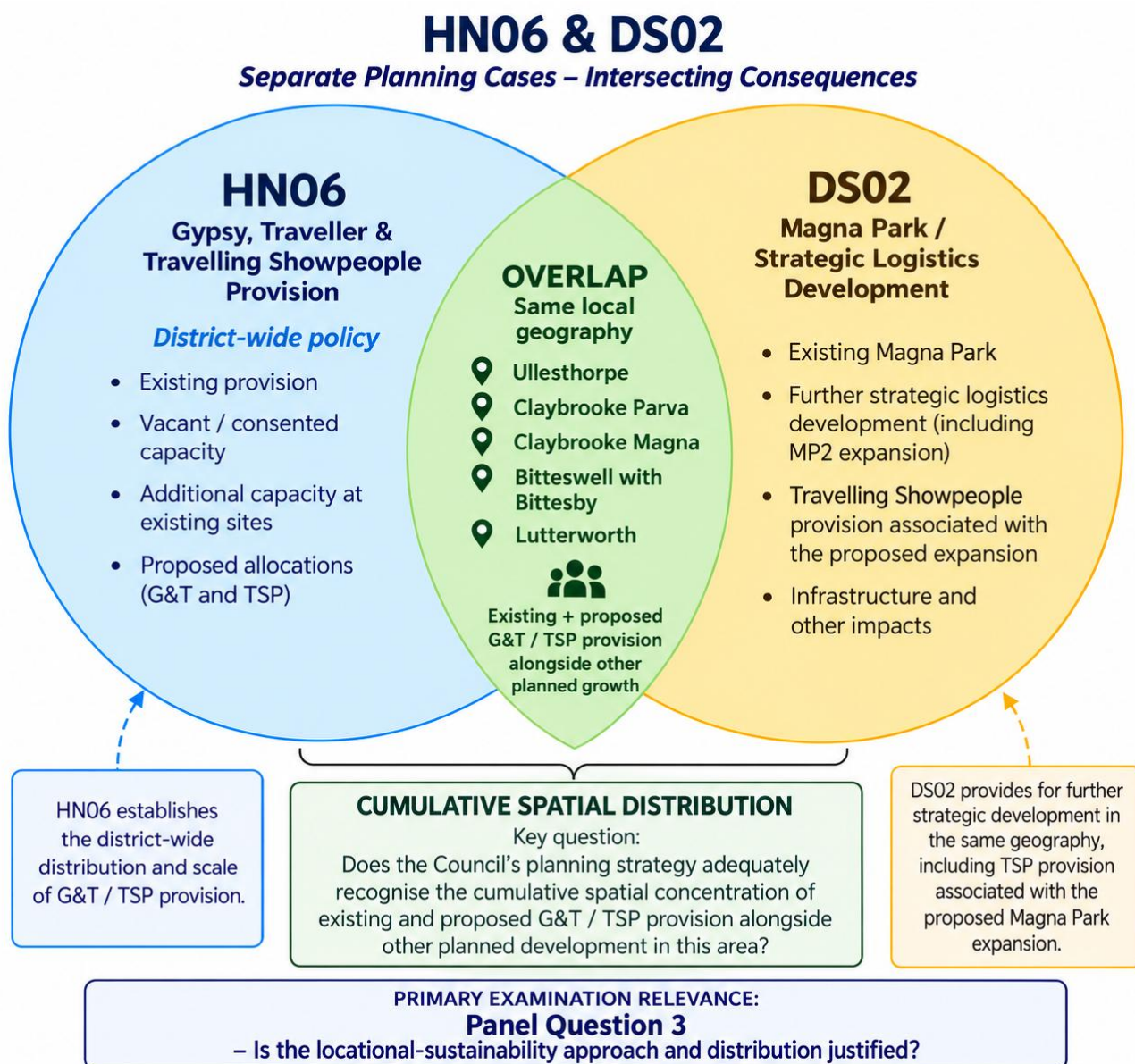
7.4. I am not suggesting that the Council is necessarily required to produce a separate design guide. The question is whether, having included reference to “current good practice design guidelines” in criterion 4(d), the Council has identified sufficiently clearly what guidance is intended to apply and how the criterion is to operate in practice.

8. Cumulative spatial context — overlapping development pressures

8.1. The issues considered above relate principally to the distribution and cumulative consequences of the proposed HN06 provision. There is, however, a wider spatial context which is relevant to understanding those cumulative consequences.

8.2. HN06 and the strategic employment/Magna Park proposals are separate planning matters and I do not suggest the Inspectors should determine the soundness of DS02 through this Hearing Statement. However, the consequences of the two strands of development intersect geographically, particularly around Ullesthorpe, Bitteswell, Claybrooke Magna, Claybrooke Parva and Lutterworth.

8.3. The diagram below illustrates the geographical overlap between existing and proposed G&T and TSP provision and the wider development pressures associated with Magna Park, including the proposed expansion.



8.4. The purpose of showing this overlap is not to suggest that the individual developments should be assessed as a single planning proposal. Rather, it illustrates why consideration of geographical distribution and cumulative consequences is relevant when assessing whether the pattern of HN06 provision is justified.

8.5. In particular, where a number of forms of development are concentrated within the same relatively small group of settlements, the relevant question is not simply whether each individual allocation can satisfy its own site-specific assessment criteria. It is whether the Council's overall planning judgement has adequately recognised the resulting cumulative spatial consequences for the settlements and communities concerned.

8.6. This reinforces the question already put under Panel Question 3: what evidence demonstrates that the geographical distribution and cumulative consequences of the proposed HN06 allocations were considered as part of the Council's final planning judgement?

9. Conclusion

9.1. My concerns about Policy HN06 can therefore be summarised in four principal questions. Panel Question 6, concerning the clarity of criterion 4(d)'s reference to "current good practice design guidelines", is addressed separately in Section 7.

1. Evidence reliability

Can the Council demonstrate that the existing supply figures underpinning its assessment of need are accurate, current and internally reconciled?

2. Allocation reasoning

Can the Council demonstrate what happened between the 13 Stage 3 sites and the final allocations, including how it established the sufficiency and deliverability of the final package?

3. Distribution and locational policy

Can the Council demonstrate that geographical distribution and cumulative consequences were actually considered as part of the final allocation judgement, and explain where the functions of the former H6(5)(b) and (c) safeguards are now secured within the proposed policy framework?

4. Transit

Can the Council demonstrate that the change from transit to permanent provision at 23/00912/FUL has been properly reflected in its assessment of supply, need and remaining transit provision?

9.2. These are not requests for the Inspector to substitute a different policy approach or determine an alternative allocation strategy. They are requests for the Council to demonstrate the evidential reasoning underpinning the submitted Plan.

9.3. If the Council can provide clear and internally consistent answers to these questions, that will assist the Inspector in determining whether Policy HN06 is justified and sound. If it cannot, the Inspector will need to consider whether further clarification, modification or other action is necessary before the Plan can be found sound.