

**Further Representation to the Examination of the
Harborough District Local Plan 2020–2041**

**Policy HN06 – Housing Need: Gypsy and Traveller and Travelling
Showpeople Accommodation**

Response to Stage 2 Matters, Issues and Questions

Principal matter: Policy HN06 – Questions 3 and 4

Subject: The justification, spatial distribution, locational sustainability and deliverability of Gypsy and Traveller accommodation, with particular reference to Claybrooke Parva and the wider Ullesthorpe/Claybrooke locality.

1. Introduction and Scope of this Further Representation:

This further representation is submitted in response to the Inspectors' Stage 2 Matters, Issues and Questions (MIQs). It is directed principally at Policy HN06, Question 3, which asks:

“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?”

It also addresses Question 4, which asks:

“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?”

Residents’ concerns are not the principle that the district should make appropriate provision for Gypsy and Traveller accommodation where a need has been identified. Rather, the issue is whether the evidence submitted to the Examination demonstrates that the spatial distribution, location, and capacity of provision proposed through Policy HN06 is justified, effective and deliverable, having regard to:

- the Council's evidence of need.
- the Council's site assessment methodology.
- the range of sites assessed.

- the consideration of reasonable alternatives.
- the geographical distribution of provision.
- the cumulative concentration of provision within rural localities.
- the accessibility and infrastructure of the receiving communities; and
- the availability, capacity and deliverability of the individual sites relied upon.

2. The Evidence Base and Identified Need:

The Council commissioned Three Dragons to undertake a Gypsy and Traveller and Travelling Showpeople Site Assessment in November 2024. The assessment was intended to identify and assess potential sites in terms of their availability, suitability, and achievability and to inform the emerging Local Plan. The assessment considered 199 sites at Stage 1, of which 22 proceeded to Stage 2. Following the assessment process, 13 sites were identified as suitable, available, and achievable. The existence of an identified need is not challenged by this representation. The issue for the Examination is instead how the Council translated that evidence into the particular geographical distribution and site capacity ultimately proposed through Policy HN06. The existence of a range of potentially suitable, available, and achievable sites is relevant because it raises the question of whether reasonable alternative distributions of provision were considered before the final spatial strategy was selected.

3. Stage 2 Question 3 – Is the Distribution Justified?

We consider Question 3 to be the central issue arising from this representation.

The Council's evidence demonstrates that a range of potential sites was considered and that more than one location could contribute to meeting identified accommodation needs. The Three Dragons assessment did not simply identify whether individual sites were available. It considered availability, suitability and achievability and identified potential capacity and potential uses arising from the sites assessed. The Examination should therefore be able to identify the subsequent planning judgement by which the Council determined the overall spatial distribution of Gypsy and Traveller and Travelling Showpeople provision.

It is not sufficiently clear from the submitted evidence:

1. How the Council assessed the geographical distribution of the potential sites as a whole.
2. How the relative merits of different geographical distributions were considered.

3. What reasonable alternative distributions were assessed.
4. How existing provision and available capacity were considered.
5. How cumulative concentrations of provision within particular localities were assessed; and
6. How the final distribution was demonstrated to represent a justified and effective strategy for meeting the identified need.

The question is not whether every site which passed the Three Dragons assessment should necessarily have been allocated. Rather, the question is whether the Council has demonstrated, through a clear and proportionate evidence base, why the distribution proposed is justified when compared with reasonable alternatives.

4. Site Selection and the Consideration of Alternatives:

The Council's evidence library includes PRE-NLP 5 (Site Selection Methodology, February 2025) and the specialist Gypsy and Traveller and Travelling Showpeople Site Assessment (HSG-NLP 7). Residents ask the Council to clarify the respective roles of these methodologies, rather than assuming that PRE-NLP 5 governed specialist Traveller-site selection. The critical question is how the specialist assessments were translated into the final allocation and distribution decisions, and where the comparison of reasonable alternative distributions is recorded.

5. Scale of the Receiving Community – Claybrooke Parva:

The Council's Settlement Hierarchy Assessment records Claybrooke Parva as having 172 residents and 77 households, based on the 2021 Census. Residents do not suggest that a mathematical ratio between the number of traveller pitches and the number of settled households determines planning acceptability. Rather, the size and characteristics of the receiving community are relevant when considering whether the scale and distribution of development are appropriate and whether local services and infrastructure can reasonably support the resulting level of development.

This is particularly relevant because Spinney View Farm is located within Claybrooke Parva.

The Council's own Three Dragons assessment identifies GT8 as:

“Spinney View Farm, Main Road, Claybrooke Parva” and identifies Claybrooke Parva in the site assessment as the relevant settlement associated with the site.

The Examination is therefore invited to consider whether the Council has adequately assessed the relationship between the scale of proposed Gypsy and Traveller provision within Claybrooke Parva and the size, services, and infrastructure of the settled

community itself. This is particularly relevant when considering the potential capacity attributed to Spinney View Farm and the cumulative level of existing, allocated and proposed provision within the locality.

6. Cumulative Spatial Concentration:

The proposed distribution should also be considered within its wider and current planning context. Individual planning applications must, of course, continue to be determined on their own planning merits, and the outcome of a pending application should not be assumed when assessing the soundness of the Local Plan. Nevertheless, when examining the spatial distribution proposed through Policy HN06, it is relevant for the Council to demonstrate that it has had regard to the existing and emerging concentration of Gypsy and Traveller accommodation within the locality.

The Claybrooke Parva locality already contains the adopted Policy H6 allocation at Spinney View Farm for three pitches. The Three Dragons assessment identifies Spinney View Farm as a Local Plan 2011–2031 allocated Gypsy and Traveller site which is currently vacant and unoccupied. There are also currently two planning applications relating to further Gypsy and Traveller provision within Claybrooke Parva:

- Spinney View Farm – an application seeking additional Gypsy and Traveller pitches at the existing site; and
- Land east of Watling Street/Woodway Lane – a retrospective application for additional Gypsy and Traveller pitches following unauthorised occupation.

Residents recognise that neither application should be assumed to be approved for the purposes of the Local Plan Examination. We also recognise that the later retrospective application was submitted after the Local Plan had been submitted for examination. Nevertheless, the current planning position is relevant to understanding the emerging cumulative planning context of Claybrooke Parva and whether the distribution proposed through HN06 remains appropriately justified considering the evidence before the Examination.

The Examination should therefore consider whether the Council has adequately considered the cumulative spatial context comprising:

- existing provision.
- adopted or safeguarded provision.
- current planning applications.
- potential additional capacity at existing sites; and
- proposed Local Plan allocations.

This is particularly relevant where the Plan itself proposes further Gypsy and Traveller provision within the same locality. The issue is not whether the current planning applications should be approved or refused. Rather, the issue is whether the Council has adequately considered the overall geographical concentration of provision when determining the distribution proposed through Policy HN06.

Residents therefore invite the Council to explain whether, and how, the planning context within Claybrooke Parva was considered when determining the proposed Local Plan distribution, and whether a more geographically dispersed distribution using other sites identified through its evidence base was considered as a reasonable alternative.

7. Relevant Recent Planning Decision – Spinney View Farm:

Harborough District Council refused application 25/00970/OUT in March 2026 for a single self-build dwelling at land at Spinney View Farm, Ullesthorpe Road, Claybrooke Parva. We confirm that the refusal relates to the same piece of land as the Spinney View Farm proposals discussed in this representation. The refusal reasons identify countryside location, locational sustainability, and visual harm as material concerns, notwithstanding the acknowledged housing land supply shortfall. The refusal concerns a conventional dwelling and cannot be transposed automatically to a Traveller-site proposal, for which distinct national and development-plan policies apply. It is nevertheless a relevant site-specific planning judgement requiring reconciliation with any assumption that additional residential use and capacity at this land are suitable and deliverable. Residents ask where the Council has explained that reconciliation in the evidence supporting HN06.

8. Spinney View Farm – Access, Capacity and Achievability:

A further matter which we consider particularly relevant to HN06 Questions 3 and 4 concerns the access arrangements at Spinney View Farm (GT8). The Three Dragons Site Assessment identifies Spinney View Farm as an existing allocated Gypsy and Traveller site with potential for additional provision. Residents understand the site has remained unoccupied since the 2018 permission; the Three Dragons assessment independently records it as vacant at the time of assessment. The assessment identifies the site as currently vacant and records potential additional capacity. However, the assessment itself identifies an important qualification concerning access. Under its assessment of the site, the report records that:

“The site may benefit from widening the current access lane (or addition of passing points).”

Under its assessment of achievability, it similarly records:

“The access lane may need to be widened or inclusion of passing places...”

The assessment nevertheless concludes that the site is available, suitable, and achievable. This raises a legitimate question as to whether the access improvements identified by the specialist assessment are necessary to deliver the additional capacity attributed to the site and, if so, whether there is robust evidence that those improvements are realistically deliverable. This is particularly relevant because access was one of the matters considered within the Three Dragons assessment process.

9. Local Knowledge Concerning Access:

Residents have longstanding knowledge of the physical limitations of the access track to Spinney View Farm. The access is a narrow single-track route. Residents understand that land immediately adjoining the access is in third-party ownership and that widening the route or creating passing places may therefore not be readily achievable. Residents have also reported instances in which emergency service vehicles have experienced difficulty accessing the site because of the restricted width of the track. We recognise that these reports are local observations and should not be treated as equivalent to formal evidence from the emergency services or Highway Authority without verification. Nevertheless, we consider the matter sufficiently important to warrant clarification because the Council's own specialist assessment has already identified the potential need for widening or passing places.

The issue is therefore not simply whether residents consider the access inadequate. The issue is whether the Council has sufficiently robust evidence to demonstrate that the site can provide the additional capacity attributed to it, having regard to the access requirements identified by its own specialist assessment.

10. Availability of Land for Access Improvements:

If widening of the access or provision of passing places is necessary, the Examination should also consider whether the land required for such works is available. In particular, the Council should clarify:

- whether ownership of land adjoining the access has been established.
- whether the land required for widening or passing places is available to the site owner.
- whether any discussions have taken place with adjoining landowners.
- whether any necessary rights or agreements have been secured or are realistically capable of being secured; and
- whether the Highway Authority has advised that the proposed access arrangements are adequate for the additional level of provision.

This is relevant to deliverability, rather than simply to the acceptability of a future planning application. If an access improvement identified as necessary by the specialist assessment cannot realistically be delivered, the Examination may question the evidential basis upon which the additional site capacity has been classified as achievable.

11. Emergency Access:

The potential emergency access issue also warrants specific clarification. We are not asking the Inspectors to assume that emergency access is inadequate solely based on residents' reports. Rather, we invite the Council to confirm whether emergency vehicle access has been assessed and, if so, what evidence supports its conclusion. This could include clarification from the Highway Authority, Fire and Rescue Service or other relevant emergency services where appropriate. Given the narrow nature of the access and the Three Dragons assessment's own reference to possible widening or passing places, we consider this to be a relevant matter when assessing whether the site's proposed additional capacity is genuinely deliverable.

12. Existing Capacity and Alternative Distribution:

The Three Dragons assessment identifies potential capacity through a combination of existing sites, vacant or under-utilised pitches and additional site capacity. This provides the Council with a range of potential ways of meeting identified need.

The Examination should therefore establish whether the Council considered alternative combinations of:

- existing vacant capacity.
- extensions or intensification of existing sites.
- new allocations.
- different geographical locations; and
- various levels of provision at individual sites.

If such alternatives were considered, we respectfully ask the Council to identify where the comparative assessment is contained within the submitted evidence base. If they were not considered, the Examination may wish to consider whether the Plan has sufficiently demonstrated that its chosen distribution represents a justified and effective strategy when reasonable alternatives are considered.

13. The 2025 Site Assessment Addendum:

HSG-NLP 8, the Three Dragons August 2025 Addendum, assessed two additional landowner-promoted sites: ADD1, Land at Moorbarns Lane, Lutterworth, and ADD2, Dunton Bassett Quarry. Both proceeded through the assessment stages and were identified as having potential for Gypsy and Traveller pitches within land previously consented for other uses. The estimated additional capacities were 10 pitches at Moorbarns Lane and 8 pitches at Dunton Bassett Quarry (Table 2.3). The consultants did not recommend expansion beyond the previously consented areas or Travelling Showpeople use, because of landscape concerns. Paragraph 2.9 expressly distinguishes potential capacity from an allocation decision. This additional evidence strengthens the need for the Council to explain whether and how those options were comparatively assessed against the chosen distribution, and why they were or were not advanced.

14. Relationship with Adopted Policy H6:

Although the Examination concerns the emerging Local Plan, the existing adopted Local Plan provides relevant local planning context. Adopted Policy H6 included the following criterion:

“The size of a site should reflect the scale of the nearest settlement, its local services and infrastructure.”

The emerging HN06 does not reproduce this wording. We recognise that the emerging Plan is entitled to adopt a different policy approach where that approach is properly justified. However, where an established local policy safeguard concerning the scale of sites relative to settlements, services and infrastructure is removed or replaced, the Examination should be satisfied that the emerging policy and its supporting evidence provide an appropriate and justified means of addressing those considerations. The Council should therefore explain the evidence and reasoning supporting the change in policy approach and how those matters are now adequately addressed through HN06.

15. National Planning Policy and Rural Locations:

Panel Note 7 (19 August 2026), reaffirmed in Panel Note 9 (21 September 2026), confirms that the submitted Plan is to be examined against the December 2023 National Planning Policy Framework. Traveller-site policy has a distinct publication and transitional history: the separate Planning Policy for Traveller Sites was updated in December 2024, and national policy was revised in August 2026 with traveller-site policies incorporated into the new NPPF. Residents therefore rely principally on the soundness questions under the framework specified by the Inspectors and ask that the applicable traveller-site policy and any transitional provisions be applied as appropriate, rather than assuming that the December 2023 edition of the separate PPTS necessarily governs every issue. Across these policy iterations, the relevant substantive planning

questions include the scale of rural sites in relation to the nearest settled community, infrastructure pressures, sustainable locations, and evidence of achievable site capacity. These are directly relevant to HN06 Questions 3 and 4.

16. Wells Close Appeal:

Residents also invite the Examination to have regard to the decision of the appointed Planning Inspector in the Wells Close appeal, Appeal Ref. APP/F2415/A/14/2222051.

We recognise that appeal decisions are determined based on their individual facts and do not establish binding precedent. The decision is nevertheless a relevant local planning comparator because it considered traveller accommodation in the same locality and the relationship between traveller site development and the surrounding settled community.

The appeal concerned a proposal for three pitches. We do not suggest that the same conclusion must automatically apply to the emerging Local Plan. Rather, we invite the Council and Inspectors to consider whether the matters addressed in that appeal have relevance to the assessment of the suitability, scale, and distribution of further provision within the Claybrooke locality.

17. Current Planning Context – Woodway Lane:

Application 26/00611/FUL seeks retrospective permission for nine Gypsy and Traveller pitches at Land east of Watling Street/Woodway Lane, Claybrooke Parva. The application and associated enforcement history are matters primarily for development management and should not be prejudged in this Examination. Residents cite the application solely as relevant emerging context when asking whether the Council has adequately considered cumulative provision within the locality. No assumption is made that the retrospective application will be approved, nor is the newer NPPF Policy DM8 advanced as a standalone test of HN06 soundness.

18. Soundness – Justification and Effectiveness:

The central issue raised by this representation is whether the proposed spatial distribution is sufficiently justified and effective. The Council has undertaken substantial work in assessing potential Gypsy and Traveller and Travelling Showpeople sites. However, identifying a number of sites as available, suitable, and achievable does not, by itself, demonstrate that the particular distribution ultimately selected is justified.

The Examination should be satisfied that there is a clear evidential chain between:

identified need → potential sites → site assessment → reasonable alternatives → comparative assessment → final distribution in Policy HN06

The submitted evidence should also demonstrate that the locations relied upon are genuinely capable of delivering the capacity attributed to them. In relation to Spinney View Farm, this includes addressing the access improvements identified by the Three Dragons assessment and establishing what evidence demonstrates that those improvements are realistically deliverable if they are required to accommodate the additional capacity attributed to the site.

19. Matters the Examination Is Invited to Clarify:

1. Where is the comparative assessment linking identified need, specialist site assessments, reasonable alternatives and the final HN06 distribution?
2. How did the Council compare more geographically dispersed alternatives with its selected allocations?
3. What role did PRE-NLP 5 play, if any, alongside the specialist HSG-NLP 7 methodology?
4. How were existing allocations, vacant pitches and potential intensification accounted for without double-counting capacity?
5. How was cumulative provision in the Claybrooke Parva/Ullesthorpe locality assessed against the scale and infrastructure of receiving settlements?
6. What evidence supports HN06 criterion 4(c) as an effective approach to locational sustainability?
7. How was the relationship of GT8 Spinney View Farm to Claybrooke Parva, including the recorded population and households, assessed?
8. How were the two sites assessed in HSG-NLP 8 (Moorbarns Lane and Dunton Bassett Quarry, estimated potential 10 and 8 pitches respectively) considered as reasonable alternatives?
9. Where is the explanation for selecting or not selecting those additional potential sites?
10. How was the adopted H6 settlement-scale safeguard considered when drafting HN06?
11. What evidence supports the additional capacity attributed to Spinney View Farm, given its recorded vacancy at the time of the assessment?
12. Has the Highway Authority assessed access adequacy for that additional capacity, including larger and emergency vehicles?

13. If widening or passing places proves necessary, is the required third-party land or access right demonstrably available?
14. How have the Three Dragons observations that access may benefit from widening or may need passing places been resolved in the deliverability assessment?
15. What account has been taken of the Council's March 2026 refusal of 25/00970/OUT on the same land, including countryside sustainability and visual-impact concerns?
16. What changes to the policy, allocation distribution or supporting evidence would be needed if those matters cannot be demonstrated?

20. Conclusion and Requested Outcome:

Residents accept the need for appropriate Gypsy and Traveller and Travelling Showpeople accommodation. The issue is whether the Council has demonstrated, through sufficiently robust and transparent evidence, that the geographical distribution proposed through HN06 is justified, effective and consistent with the applicable national planning policy framework. The evidence should show how reasonable alternatives were compared, how cumulative provision and the receiving community's infrastructure were considered, and how individual site capacities can actually be delivered.

In particular, the August 2025 Addendum identifies two further potentially suitable options, while the original assessment raises a specific question about access improvements at Spinney View Farm. The Council's March 2026 refusal of a dwelling on the same land also calls for a clear explanation of how site-specific sustainability and landscape concerns have been treated in the Traveller-site assessment. None of these matters automatically requires refusal of an individual planning application or deletion of an allocation; they do require a reasoned response within the plan-making evidence.

If the Council cannot satisfactorily demonstrate these matters, residents respectfully request that the Inspectors consider whether modifications to Policy HN06, its spatial distribution, or its supporting justification are necessary to secure soundness.

Evidence references: HSG-NLP 7 (November 2024 Site Assessment); HSG-NLP 8 (August 2025 Addendum, paragraphs 1.4–1.7 and 2.7–2.11, Table 2.3); PPL-NLP 1 (Settlement Hierarchy); PRE-NLP 5 (Site Selection Methodology); ID8 (Panel Note 7); ID10 (Panel Note 9); planning decision 25/00970/OUT; Wells Close appeal APP/F2415/A/14/2222051.