

HARBOROUGH LOCAL PLAN EXAMINATION STAGE 2 MATTERS, ISSUES AND QUESTIONS IDENTIFIED BY THE INSPECTORS**ON BEHALF OF BLOOR HOMES (RESPONDENT 8317) – MATTER 10 DESIGN OF DEVELOPMENTS AND MANAGEMENT OF IMPACTS****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 additional evidence base documents produced by the Council and 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: Development Standards (Policy DM05 Green and Blue Infrastructure)

Question 1. Is it realistic to expect *all* development, including residential development of less than 10 homes, to meet criteria 1a) to 1c) of Policy DM05, i.e. to contribute to creating high-quality multifunctional green and blue infrastructure, create and enhance accessible links for all and enhance access to publicly accessible open space?

Question 2. Is it realistic and justified to require residential development of 10 or more homes to meet a local standard of 8.5 Ha of Natural and Semi-Natural Open Space per 1000 people in urban and rural areas of Harborough District? Is criterion 2 of policy DM05 flexible enough to be effective?

1. Bloor Homes responds to Questions 1 and 2 together for completeness. As per Bloor Homes' Regulation 19 representations we consider that this policy should be amended to provide further flexibility to be effective. We note the Council has not proposed any Main Modifications to the policy in this regard and therefore the previously proposed amendments remain applicable.

Issue 1: Development Standards (Policy DM06 Transport and Accessibility)

Question 3. On the basis that the majority of new development, including both housing and employment, together with other ancillary mixed uses, is to be provided on green

field sites, how are the locations which have been identified to be made sustainable to offer a genuine choice of transport modes to locations, both within and outside of the District? How is this to be paid for, and how will it be achieved? Has a consistent approach been taken to considering how on-site and off-site impacts are to be mitigated? How will the vision-led approach be achieved and how will that vision be set? Notwithstanding the Council's response in [HDC6] where the Council made clear that it was working on the premise of a vision-led approach is this consistent with a plan prepared under the NPPF 2023? If so, have fall back costs of schemes been prepared, were the mitigation works to reduce the impacts on the highways fail?

Question 8. The evidence suggests that many of the junctions within the District are operating close to capacity [TRP-NLP5] with particular issues highlighted along the A5 and A6, and with further impacts forecast on roads lower in the hierarchy as the Plan period unfolds. To what extent are the policies of the Plan, including site allocations consistent with paragraphs 108-117 of the NPPF?

2. Bloor Homes responds to Question 3 and 8 together for completeness. In respect of site allocation S2: Land at Beeby Road, Bloor Homes would note that whilst it represents a greenfield site, it is located within the Tier 1 Adjoining Leicester Urban Area with access to sustainable transport links that have the potential to be enhanced, as per the accompanying Framework Travel Plan to the planning application. As part of the draft Section 106 agreement there are financial contributions towards sustainable transport measures including an extension of a Demand Responsive Transport Service serving Scraptoft and the development. As recognised in the response to Matter 3, Question 3 the enhanced viability position of greenfield sites enables these contributions to be made.
3. Highway and transport matters in relation to site allocation S2 have been considered in detail via the decision-making process in relation the recent resolution to grant planning permission subject to a Section 106 (reference 25/00767/OUT) for the erection of up to 200 dwellings, open space, landscape, drainage and associated infrastructure works (access to be considered). Please see responses to Matter 7 for further details. The proposed residential development of the site accords with national planning policy provisions in relation to promoting sustainable transport.

Question 18. In overall terms, is the approach of the transport related policies of the Plan justified, effective and consistent with national planning policy?

Question 19. Are there any MMs required for the Plan to be found sound?

4. Bloor Homes responds to Questions 18 and 19 together for completeness. As per Bloor Homes' Regulation 19 representations we consider that this policy should be amended

to ensure it is sound. No modifications have been proposed in respect of this by the Council and therefore the proposed amendments put forward by Bloor Homes remain applicable.

Issue 1: Development Standards (Policy DM08 Sustainable Drainage)

Question 3. Are the requirements for rainwater storage in criterion 1, and surface-water reduction rates in criterion 2f) of policy DM08 sufficiently clear?

5. Bloor Homes refer to their Regulation 19 representations which raised concerns in respect of these criteria (note, it is understood that the reference to criterion 2f within the question is criterion 3f). The Council has proposed a Main Modification to criterion 3f) which provides further clarification. No modifications have been proposed in respect of criterion 1 by the Council and therefore the proposed amendments put forward by Bloor Homes remain applicable.

Issue 1: Development Standards (Policy DM09 Sustainable Construction and Climate Resilience)

Question 3. Are the BREEAM standards and ratings appropriate in policy DM09, and consistent with national policy? In criterion 2 of policy DM09, is the BRE Home Quality Mark minimum three star rating standard for residential development consistent with national policy and justified? Is whole life-cycle assessment practicable for major residential development?

6. Bloor Homes respond to Question 3 and 4 together for completeness. Bloor Homes refer to their Regulation 19 representations which raised concerns with the use of the voluntary certification scheme BRE Home Quality Mark scheme. No modifications have been proposed in respect of this by the Council and therefore the proposed amendments put forward by Bloor Homes remain applicable.

Issue 1: Development Standards (Policy DM10 Biodiversity and Geodiversity Protection and Enhancement)

Question 2. Is the 'at least 10% measurable biodiversity net gain' figure in criterion 1 of policy DM10 justified, considering both local biodiversity need and the need to deliver development in the District?

7. Bloor Homes refer to their Regulation 19 representations which requested the removal of 'at least' to ensure consistency with legislative requirements. No modifications have been proposed in respect of this by the Council and therefore the proposed amendments put forward by Bloor Homes remain applicable.