

HARBOROUGH LOCAL PLAN EXAMINATION STAGE 2 MATTERS, ISSUES AND QUESTIONS IDENTIFIED BY THE INSPECTORS**ON BEHALF OF BLOOR HOMES (RESPONDENT 8317) – MATTER 11 IMPLEMENTATION OF THE PLAN****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: Monitoring and Delivery

Question 5. The Council is required to commence plan making under the new local plan system 5 years after adoption of this Plan. Policy IM01 criterion 2 refers to a whole plan/partial review or update of the Plan. In practical terms would it be possible for the Council to undertake an early whole Plan/partial review/update of this Plan and submit it for examination in the current/legacy local plan system before 31 December 2026 deadline? If this is not possible, how would Policy IM01 need to be changed to accord with the new local plan system?

1. Bloor Homes support the principle of a Plan review policy that requires the Council to continue to monitor and account for the unmet housing needs of Leicester having regard to ongoing plan-making and Statements of Common Ground.
2. Bloor Homes consider this policy should also have regard to significant changes in local housing needs and requirements. Paragraph 33 of the NPPF (2023) states

'Reviews should be completed no later than five years from the adoption date of a plan and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly;

and they are likely to require earlier review if local housing need is expected to change significantly in the near future.’

3. Whilst the Plan is not subject to the plan-making policies of the NPPF (2026) it is also worth noting that Policy PM2 of the NPPF (2026) states that preparation of the next local plan must be commenced no later than five years after the adoption of the current plan, but should be prepared earlier in certain circumstances, which are:
 - a) An Inspector at examination of the current local plan has made a recommendation to prepare a new plan earlier; or
 - b) There has been a significant change in local circumstances, including where an area’s housing requirement has significantly increased following the adoption of a spatial development strategy.
4. In view of the increase in the standard method figure for Harborough ((which as of May 2026 is 755 dwellings per annum, versus the Plan baseline for 534 dwellings per annum based on the 2023 standard method) a plan review policy would be appropriate, as per paragraph 33 of the NPPF (2023) and Policy PM2 of the NPPF (2026). An early plan review policy should be included as per criterion a) of Policy PM2 having regard to the principles of criterion b).
5. Even accounting for the higher rate of 657 dwellings per year in 2020-2036, the plan provision for 2020-2041 at 628 dwellings per annum is still below the updated standard method needs. This does not account for any unmet needs beyond 2036, which as per the Leicester and Leicestershire Authorities Statement of Common Ground relating to Housing Distribution following NPPF and new Standard Method [SCG-NLP 18] could be at least an additional 62 dwellings per annum, resulting in a requirement of 817 dwellings per annum when added to the current 755 dwellings per annum local housing need.
6. Whilst the Council considers there is contingency in the housing land supply to provide flexibility to accommodate unmet needs (as per proposed Main Modification MM26.1 of Appendix 1 to HDC 2) this does not represent a ‘secured’ housing requirement.
7. It is recognised that the Plan is advancing under the NPPF transitional arrangements, which allows Plans to proceed based on housing requirements meeting 80% of the local housing need (as at 2024). However, the 2026 standard method figure shows an increase from 2024 (755 dwellings per annum versus 723 dwellings per annum respectively) and there is the local context of unmet needs arising from Leicester to consider (see Question 7 below). In the context of a pause in Local Government Reorganisation (and resulting uncertainty on the implications for related Spatial

Development Strategies) the Government has advised local planning authorities that plan-making activities should not be delayed. It would therefore remain appropriate for Harborough Council to undertake its own Local Plan review.

Question 6. Section 15C of the Planning and Compulsory Purchase Act (as amended) confirms that only one local plan may have effect in relation to a local planning authority's area at any one time. Therefore, would the requirement for a partial review be effective?

8. As well as the legal considerations, in view of the potential implications of an updated housing need and requirement for the overall spatial strategy and additional site allocations, Bloor Homes would support a full review of the Plan rather than a partial review.

Question 7. A primary purpose of policy IMO1 criterion 2, which requires a whole Plan/partial Plan review/update, is to address any quantified unmet housing need from Leicester City to 2041. Would this effectively address any unmet need to 2041?

9. A review of the Plan would not realistically address unmet need to 2041 alone; it would need to consider needs beyond that period. Bloor Homes considers that the policy should be amended to reflect a requirement to consider unmet needs over a plan period that has regard to the plan period for the immediate plan review required for Leicester (as required by Policy MoO1: Plan Review of the adopted Leicester Local Plan, June 2026). This policy expects the plan review to be completed within three years of the adoption of the current Plan (June 2026).