

**HARBOROUGH LOCAL PLAN 2011-31 EXAMINATION**  
**HEARING STATEMENT – MATTER 6**

On behalf of:  
**Manor Oak Homes**

**Respondent ID: 7562**

Date:  
**September 2018**

Reference:  
**LR/00915/LP Examination Matter 6**



## 1.0 Introduction

1.1 This statement is prepared on behalf of Manor Oak Homes in relation to Matter 6: Spatial Strategy and Countryside Protection with particular reference to questions 6.1 and 6.5, as follows:

- 6.1 Is the spatial strategy as set out in Policies SS1 and H1 and their supporting text soundly based? Is the settlement hierarchy soundly based?
- 6.5 Is Policy GD2 a sound approach to allowing additional development in sustainable locations?

## 2.0 Is the spatial strategy as set out in Policies SS1 and H1 and their supporting text soundly based? Is the settlement hierarchy soundly based?

2.1 The representations submitted on behalf of Manor Oak Homes to the Harborough Local Plan 2011-31: Proposed Submission expressed concern regarding the provisions of Policy SS1, which identifies The Kibworths as a Rural Centre, and the soundness of the settlement hierarchy as a consequence, together with Policy H1, which proposes no housing target for The Kibworths. We understand that the Council wishes to add text to paragraph 5.1.17 to make it clear that the residual housing requirement in certain centres, including The Kibworths, is zero<sup>1</sup>. Such an approach would impose a severe restraint over the plan period, and fails to recognise the sustainably credentials of some of these centres and their capacity and suitability to accommodate development beyond that currently committed. Other than to suggest an alternative way of presenting the same information, the Council's response to Question 1 of the Inspector's Initial Questions provides no explanation as to why such an approach of restraint is justified other than the fact that the settlements in question have existing high levels of commitments and completions.

2.2 In relation to The Kibworths, Manor Oak Homes recognise that it has the benefit of existing commitments and completions amounting to 901 dwellings. However, decisions regarding the ability of settlements to accommodate development should not be based solely on existing commitments and completions but should properly consider the historical circumstances surrounding those commitments and completions, the suitability and capacity of those settlements to accommodate additional growth and whether doing so would secure sustainable patterns of development and potentially resolve any infrastructure deficiencies. Manor Oak Homes believe that in affording The Kibworths a housing requirement of zero, it has failed to carry out any such robust assessment of the settlement and the role and function it performs.

2.3 **Historical Context:** The existence of 901 completions and commitments is given as the determining factor in proposing a housing requirement of zero for The Kibworths, and that as a result of this the

---

<sup>1</sup> Harborough Local Plan Examination: Responses to the Inspector's Initial Questions Q1-23

conclusion is drawn that The Kibworths is already providing its share of growth over the plan period. This is not the case, however, as this high level of delivery is primarily the result of the build out of Land off Wistow and Warwick Road that was allocated for development by Policy KB/1 of the Harborough District Local Plan adopted in April 2001. The delivery of these homes is therefore not a sign of the Kibworths meeting a proportion of current needs, but rather the much-delayed development of a site that was allocated to meet the needs of the district in the previous plan period that ended in 2006. Contrary to the Council's assertions, recent completions are actually an indication of past under delivery, which The Kibworths is only just catching up with. Similarly, existing commitments are the result of a series of developments that have come forward in response to the Council's inability to demonstrate a five-year housing land supply and historical shortfall, again a demonstration of the need to catch up with past under delivery.

- 2.4 **Role and Suitability of The Kibworths:** The focus on completions and commitments as justification for housing distribution indicates a decision-making process that has failed to fully assess the sustainability of The Kibworths as a location for growth, and therefore to undertake a robust assessment of reasonable alternatives.
- 2.5 Paragraph 5.1.17 explains that "*The scale of new housing to be provided in individual settlements reflects the roles of different places in the settlement hierarchy*".... and that "*These roles partly reflect the population size of the settlements and their location in respect of other settlements but also relate to the range of activities and services present and, in relation to primary schools, their ability to expand to accommodate the needs generated by new development*". Manor Oak Homes contend that regard has not been properly had to these factors in considering The Kibworths capacity for growth. Indeed, the focus on housing completions and commitments fails to acknowledge the new retail, community and employment facilities that are being provided as part of those developments and the opportunities that exist in tandem with further housing growth, to bring forward new facilities, particularly a new and much needed primary school (West of Warwick Road, Kibworth), but also additional commercial uses (Windmill Farm, Kibworth), which together would support spatial strategy (Policy SS1 (7)).
- 2.6 The Kibworths is by far the largest of the Rural Centres and should be identified as a Key Centre due to its size and its role providing key retail, service and employment infrastructure. A role that is comparable with other Key Centres and has in recent years led the Council and Planning Inspectors to view is as an appropriate location for new housing development and a possible location for a Sustainable Development Area. A detailed explanation as to why The Kibworths should have been identified as a Key Centre and its suitability and sustainability as a location for accommodating growth is provided in or client's representations to the Proposed Submission Local Plan. We do not repeat that here.

2.7 The continued designation of The Kibworths as a Rural Centre alongside settlements that are far smaller and have a much smaller range of retail, service and employment provision and the pre-occupation with existing completions and commitments, which are a reflection of past under delivery, has led to the Council failing to recognise the sustainability of The Kibworths as a location for further growth.

2.8 **Opportunities Offered by Growth:** Notwithstanding, the statement at paragraph 5.1.17 that in considering housing targets regard would be had *"to the range of activities and services present and, in relation to primary schools, their ability to expand to accommodate the needs generated by new development"*; the opportunities offered by available land within The Kibworths to secure a new primary school have been overlooked. As explained as part of the representations made to the Proposed Submission Local Plan, Manor Oak Homes has control of land immediately to the west of the built up area of The Kibworths, which could accommodate up to 400 new homes and a new primary capable of meeting the needs of the development, and more importantly, resolving current deficiencies in local education provision as a result of the inability of the existing primary to expand. These proposals are the subject of current planning application reference 18/00579/OUT, which is accompanied by a comprehensive package of supporting documents, including an Environmental Statement, that demonstrate that an appropriate and sensitively designed development could be achieved that could positively contribute to the identified needs of The Kibworths.

### ***Proposed Change***

2.9 To ensure the Plan is positively prepared, justified and effective, the following further work and changes to the plan are required:

- The proposed settlement hierarchy should be reconsidered and The Kibworths identified as a Key Centre; and
- Regardless of any change to the settlement hierarchy in relation to Kibworth, Policy H1 should be revised to include a minimum housing target for The Kibworths of circa 450 homes. This level of development would help to meet the inevitable shortfall arising from the under-delivery at the SDAs and additional need coming from Leicester and would also deliver a new primary school to meet a critical local need.

## **3.0 Is Policy GD2 a sound approach to allowing additional development in sustainable locations?**

3.1 Policy GD2 is intended to allow new development within or contiguous with the existing built-up areas of Rural Centres and Selected Rural Villages subject to five criteria (a-e), all of which must be satisfied.

The principle of allowing additional development outside settlement boundaries in sustainable locations is very much welcomed by Manor Oak Homes. However, Criterion a of Policy GD2 as currently drafted would not in practice present a sound approach to allowing new housing development in sustainable locations as in combination with Policy H1 it would work to prevent otherwise entirely acceptable development in well served settlements where no housing target has been set.

- 3.2 Criterion a links any new housing proposals to the housing targets set for each settlement under Policy H1. However, some settlements have been set no target. The result is that proposals in those settlements, some of which like The Kibworths, represent an accessible and well served settlement capable of accommodating new development within or contiguous with the built up that could meet the remaining criteria, would not be able to comply with this criteria.
- 3.3 The clarification provided at paragraph 4.3.4 regarding how the term 'significantly exceed' should be interpreted and that as a rule of thumb proposals should not normally exceed the target by 10% is welcomed. However, such a blanket approach pays no attention to the scale, character and sustainability of the individual settlements across which there is considerable variation and their capacity to promote sustainable patterns of development.

***Proposed Change***

- 3.4 To ensure the Plan is justified and effective, the following changes are considered necessary to Policy GD2 and its supporting text to respond to the concerns raised above:

Criterion a should be amended as follows:

- a. in the case of housing, it does not, cumulatively with other proposals, significantly exceed the target for the delivery of new homes in the Rural Centres and Selected Rural Villages specified in Policy H1 Provision of new housing. Where no housing target is set under Policy H1 proposals will be considered in accordance with paragraph 5.1.17;*

Paragraph 5.1.17 of the supporting text should be amended as follows:

*4.3.4 Delivering housing to meet identified need across the District is a vital element of the Local Plan and Policy H1 sets out target figures for the most sustainable settlements in line with Policy SS1. These target figures are linked to ensuring that the District's housing requirements are met and most development is directed to the most sustainable locations in the District. Policy GD2 supports the aims of the spatial strategy by ensuring that the settlement housing targets set out in Policy H1 are followed. ~~While the term 'significantly exceed' in criterion a should be interpreted by the decision-maker in the context of local circumstances, as a rule of thumb the target should not normally be exceeded by more than about 10%. having regard to the population size of the settlements and their location in respect of~~*

*other settlements but also relate to the range of activities and services present and, in relation to primary schools, their ability to expand to accommodate the needs generated by new development.*