

Examination of Harborough Local Plan 2011 to 2031

Statement on behalf of Bloor Homes Ltd

Submitted by Define Planning & Design Ltd

Matter 6 – Spatial Strategy and Countryside Protection

Q6.1: Spatial Strategy and Settlement Hierarchy

1. The proposed settlement hierarchy set out in Policy SS1 and the principle that this should be used to manage growth and direct development to appropriate locations in a sustainable manner has been consistently supported in the representations submitted by Bloor Homes throughout the preparation of the Local Plan. Specifically, the identification of the Principal Urban Area (PUA), including Scraftoft, Thurnby and Bushby, at the top of the hierarchy as a focus for housing and employment growth in the District was welcomed as that reflects the locality's accessibility to higher order facilities, services and employment opportunities, and the level of infrastructure available to support the future development required to meet the identified housing needs of the District. In that respect at least the settlement hierarchy forms the basis of a sound spatial strategy.
2. However, the Local Plan then fails to allocate any other sites at the PUA other than the proposed Scraftoft North SDA. Moreover, Part 2 of Policy SS1 policy as currently couched could be interpreted as limiting the scale of development required in this most sustainable location in the District. That is fundamentally unsound in that the distribution of housing throughout the District consequently does not reflect the spatial strategy that is purported to underpin the Local Plan, particularly given the concerns that have been raised in relation to the timing of the delivery of the Scraftoft North SDA (see also the statement submitted on behalf of Bloor Homes in relation to Matter 2).
3. However, this matter can be remedied through the allocation of additional development sites at the PUA to take full advantage of its intrinsic credentials as a sustainable location for future growth. Indeed there are opportunities to allocate smaller development sites there that could make an extremely valuable contribution to meeting the District's identified development needs, effectively mitigate the inherent risk within the Local Plan that arises from the substantial over reliance on the timely delivery of two SDAs, and would of course also be very well placed to address the established unmet needs that are arising in Leicester.

Q6.4: Policy GD2

4. The aspiration of Policy GD2 to enable the development of unallocated sites in sustainable locations that accord with the Local Plan's spatial strategy was welcomed in the representations submitted by Bloor Homes, as the policy will help to ensure that the Local Plan is effective in addressing the identified housing needs. The NPPF's presumption in favour of sustainable development requires the Local Plan to be sufficiently flexible to adapt to rapid change (para 14). The criteria-based approach of Policy GD2 will provide some flexibility in the housing land supply facilitated by the Local Plan by allowing other sustainable development opportunities to come forward to address the shortfalls in provision that are likely to arise as elements of the anticipated land supply are delayed or do not come forward at all.

5. The policy supports the principle of permitting development within or contiguous with the existing or committed built up area of the PUA. That is particularly significant in light of the concerns highlighted in their objections to Policies SS1 and H1 in relation to the number, nature and location of the housing allocations proposed to meet the housing requirements; notably the failure to allocate any sites other than the Scraptoft North SDA at the PUA that is positioned at the top of the proposed settlement hierarchy. Indeed in that context, it is noted that Policy GD2 does not seek to artificially limit development at the PUA under Part 1a and that is particularly supported (notwithstanding the concerns highlighted in relation to Policy SS1 above).
6. The proposed approach in Policy GD2 also allows an appropriate balance to be struck between respecting the countryside and facilitating sustainable development that would deliver socio-economic and environmental benefits. The approach also avoids the unnecessary definition of prescriptive limits to development that quickly become out of date, and the application of a blanket countryside protection policy that does not accord with the policies of the NPPF.
7. However, in this regard it is also important that the Local Plan appropriately guides the preparation of Neighbourhood Plans that are coming forward to ensure that they do not subsequently seek to revert to a prescriptive approach that stifles that essential flexibility to deliver appropriate and much needed development, especially in highly sustainable locations such as within and adjacent to the PUA.
8. Otherwise the criteria proposed within the policy is considered to be generally appropriate, albeit that they need to be considered in the context of the site's specific circumstances. That said the Inspector has raised a valid concern in Question 13 of the Initial Questions. That does need to be addressed in the policy's expression and in that context it is important to consider the wider socio-economic benefits and scope for mitigating any harm in proposals.

Q6.5: Policy GD7- Green Wedge

9. Bloor Homes objected to the unjustified proposed designation of a Green Wedge between Thurnby / Bushby and Scraptoft adjacent to the area of committed housing development to the north east of Bushby (as identified on the Proposals Map Inset Map 63 – Scraptoft, Thurnby, Bushby). The western part of this area is currently designated as an Area of Separation that sought to prevent coalescence of Scraptoft with Thurnby and Bushby (Core Strategy Policy EV/3 and Scraptoft Neighbourhood Plan Policy S7). However, no justification was given in the Local Plan or the supporting evidence base (at that time) in relation to the change of policy approach or the extended area of designation. Indeed the Green Wedge Review (Draft Technical Update 2015) only considered the redesignation of the extant area of Green Wedge to the south of the existing urban area of Bushby.
10. It is noted that the Countryside Topic Paper now seeks to provide that justification by reference (para 5.41) to a review that was presumably undertaken post preparation of the Submission Version of the Local Plan that had already included the redesignated and extended Green Wedge area (Proposed Leicester/Scraptoft/Bushby Green Wedge: Background Report 2018). Indeed, it seems from that Background Report (para 3.5) that the designation area in question forms part of an extended Green Wedge that is intended to compensate for the future loss of the existing Green Wedge to the north of Scraptoft as result of the allocation of the North Scraptoft SDA and then seeks to guide development thereafter.
11. However, the geography of the area cannot be ignored and the concept of compensation does not provide any justification for the redefinition and extension of the designated area to the south of Scraptoft, which is not physically, visually or functionally related to the extant Green Wedge or SDA proposals to the north of Scraptoft, particularly given the stated purposes of the Green

Wedge designation. The application of an inappropriate further policy constraint in the area in question in light of the development of the SDA beyond Scraptoft is, therefore, entirely unnecessary and inappropriate.

12. The Countryside Topic Paper that summarises the reasoning for the policy proposals also seeks to highlight how the proposed designation area would fulfil the stated purposes of a Green Wedge. It refers to the need to maintain a separation between Thurnby / Bushby and Scraptoft, but the extant Area of Separation designation already performs that role, and this purpose provides no justification for the significant eastwards extension of the designated area far beyond the existing or currently proposed urban form.
13. The Topic Paper also states that the designation is not intended to prevent further development in the area should it become necessary in a future review of the Local Plan, but it then continues to state that the designated area would be kept free from development. There is, therefore, a presupposition about where development might occur in the future, but that value judgment has been made without any knowledge of the scale and form of development that may be required, how the geography of the area would be affected by the required development or the opportunities that might arise in relation to Green Infrastructure provision in the area. Moreover, there are sufficient policies within the Local Plan to appropriately guide development form without the need for further restrictive measures. The significant extension of the designated area is, therefore, also unwarranted and inappropriate in this respect.
14. Moreover, the extended area clearly does not provide a green lung extending into the urban area as it instead extends out in to the open countryside. In terms of providing public access to the countryside and providing recreation opportunities there would in reality be little or no change on the ground as a result of the designation. The nearby committed developments in this locality provide appropriate connections between the urban area and the surrounding countryside, incorporating key public rights of way and provide significant recreational opportunities without adding pressure or undermining the function of the wider area. However, aside from the provision associated with those developments, there are no specific proposals for using the designated area for recreational purposes or even increasing public access to it. The reality is that the area remain a fully functional part of the wider countryside in agricultural use with public access limited to the few existing public rights of way that run through it.
15. As such the redesignation and extension of the Green Wedge in this area is neither necessary nor justified in light of any of its specified purposes, let alone all 4 of them as is required by the Green Wedge Review Joint Methodology that was agreed by Local Planning Authorities across the City/County in 2011. The Green Wedge designation that applies to the area between Thurnby/Bushby and Scraptoft should, therefore, be deleted.