

HEARING STATEMENT FOR THE HARBOROUGH LOCAL PLAN EXAMINATION

MATTER 8: POLICY GI3 CEMETERIES

ON BEHALF OF WILLIAM DAVIS LTD

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PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

1. Background

- 1.1 This statement is prepared on behalf of William Davis, who have land interests to the north west of Market Harborough.
- 1.2 William Davis is a family owned company based in the East Midlands that has been building homes for more than 80 years. For three years running, William Davis been rated a five-star homebuilder in the Home Builders Federation's annual survey of homeowners, meaning more than 90% of their customers are extremely happy with their home and the William Davis experience.
- 1.3 Traditionally, William Davis directly employs the majority of its workforce including bricklayers, joiners, ground workers, plumbers and electricians. William Davis Ltd. will therefore endeavour to employ local labour including collaborating with relevant stakeholders to support and offer training and employment initiatives, wherever possible.
- 1.4 William Davis has two primary objections with the submitted plan:
 - a) To ensure that the wider needs of the Housing Market Area (HMA), particularly Leicester's unmet needs, are going to be provided for at the earliest possible opportunity; and
 - b) The proposed cemetery allocation at Policy GI3c is unjustified and, if not omitted, would cause the plan to fail this test of soundness.

2. Issue 8.25

- 2.1 This asks: '*Are the cemetery requirements in Policy GI3 justified, in particular the allocation in Market Harborough and the cemetery requirements in Policies SC1 and L1, and are they the most appropriate locations against the alternatives, having regard to the evidence?*' This statement focuses on the proposed cemetery allocation at Policy GI3c, which is to provide a minimum of 3,000 burial plots on land the east of Harborough Road, to the north of Market Harborough.
- 2.2 William Davis has an interest in this and surrounding land and objects to the proposed allocation on two grounds:
 1. The proposed allocation is not justified, as it has not been demonstrated that the site needs to be allocated or is the most appropriate taking into account the reasonable alternatives; and

2. The allocation could prejudice future growth options for the town.

Unjustified

- 2.3 It is a test of soundness for the plan to be justified; this is simply not the case for the proposed cemetery allocation at Policy GI3c. The evidence supporting Policy GI3 is the Harborough Cemetery and Burial Strategy (2016), as confirmed at Table B.22 of the submitted plan. Policy GI3 contains three components to increase the number and availability of burial plots in the district:
 - a) To permit extensions to existing burial sites;
 - b) To permit new burial sites where justified, including provision for the East of Lutterworth and Scraftoft North SDAs; and
 - c) The allocation of a new burial sites on land to the east of Harborough Road, as shown on the Policies Map.
- 2.4 It is the third component of the policy that we object to. The first two components of Policy GI3 are very permissive and encouraging of new burial plots being provided for as part of the local plan, in accordance with the recommendations of the Harborough Cemetery and Burial Strategy (2016). This report includes a 'Proposed Policy Approach' at Section 14.2, with paragraph 14.2.3 stating in relation to new burial sites "*Where there a requirement for additional capacity for burials which cannot be met through extending existing sites, new burial sites should be considered. The location of these should reflect the location of the need. Potential impacts associated with new sites should be taken into account, including transport, landscape, ecology, heritage, visual, and impacts resulting from a loss of amenity*" [my emphasis]. There is no recommendation to make an actual allocation in the plan.
- 2.5 In light of the first two components of Policy GI3 and the recommended approach to policy in the 2016 strategy, it is contended that there is no requirement for a site specific allocation in the Plan in order for it be sound.
- 2.6 Notwithstanding that conclusion, is the site proposed to be allocated appropriately justified?
- 2.7 The Submission Sustainability Appraisal (S6) includes 'Consideration of Alternatives' at Part 2, with cemetery provision at Section 20. This states, at

paragraph 20.2.1, that HDC commissioned a specialist study in April 2017 and that this involved a study of four sites as being potentially suitable for cemetery provision. The SA does not consider alternatives any further in respect of cemetery allocations and simply relies on this specialist study, providing a hyper-link to it at paragraph 20.3.2. However, this link is to the Harborough Cemetery and Burial Strategy (2016) that contains no consideration of potential sites.

- 2.8 The specialist study referred to in the SA is not available on the HDC website and has not been subject to any consultation. Without appropriate publicity and consultation, it is not possible to conclude that the proposed allocation site is justified. The landowners have not been approached to enquire as to whether they would be prepared to make the land available for use as a cemetery. It is evident as a result of this objection that the site is not available.
- 2.9 There is no indication in the plan on who would develop or run the allocation as a cemetery. Supporting paragraph 9.5.3 notes that the Council will consider use of its CPO powers if necessary to deliver this project. However, the Infrastructure Delivery Plan (IDP) of 2017 excludes land acquisition costs from its cemetery provision cost assumptions (paragraph 13.2.7) and thus the conclusions that the IDP funding gap can be provided for via S106 contributions fails to take account of land acquisition costs.
- 2.10 There is thus a significance risk that the proposed allocation will be undeliverable for a new cemetery. The allocation has not been justified and is, in any event, unnecessary.
- 2.11 Proposed allocation GI3c must therefore be omitted from the plan in order for it to be found sound.

Future Growth

- 2.12 The SGP identifies significant levels of growth required to meet the anticipated housing needs for the period 2031-2050, indicating a delivery rate of 944dpa for HDC over that period (Table 4 in Appendix B of the SGP). Whilst a considerable amount of this housing will be targeted towards the A46 Growth Corridor, Market Harborough is the main town in the District and is well placed to continue to accommodate a proportion of the HMA's growth needs.

- 2.13 William Davis has land interests to the north west of the town, close to its Airfield Farm development that forms part of the Western SDA. It is considered that there are limited options for the future growth of the town and, as a consequence, it is inadvisable and poor forward planning for this plan to potentially prejudice a strong future growth option candidate. A summary of baseline constraints around the town are summarised as follows

Northern edge of Market Harborough

- 2.14 Directly adjacent to the existing urban area, land is particularly constrained for two reasons: firstly because of the steep, visually sensitive slope that extends down from the urban edge; and secondly because of the designated area of 'Gap' or 'Separation' between Market Harborough and Great Bowden to the north. The combination of these two constraints effectively prohibit development in these areas. Slightly further north however, either side of Leicester Lane, the land is less constrained (having been identified as Moderate/Low sensitivity on the 2009 Market Harborough Landscape Character Assessment and Capacity Study), notwithstanding the presence of a long-distance view north-eastwards and the (linear) arrangement of the Grand Union Canal Conservation Area. The various combinations of housing and business allocations and commitments directly west on the Airfield Farm site will also provide an element of connectivity in terms of built form to this parcel of land.

Southern edge of Market Harborough

- 2.15 The Harborough DC boundary runs tight against the southern edge of the settlement, which is generally characterised by residential development and public sports facilities. At the south-eastern corner, between Baybrook Road to the east and the existing settlement and allocated/committed residential sites to the west, land is less constrained however the River Jordan valley and associated flood plain run through this parcel (having been identified as Moderate/High sensitivity on the 2009 Market Harborough Landscape Character Assessment and Capacity Study), and there are also a number of long distance views across the parcel from Baybrook Road on the approach into Market Harborough.

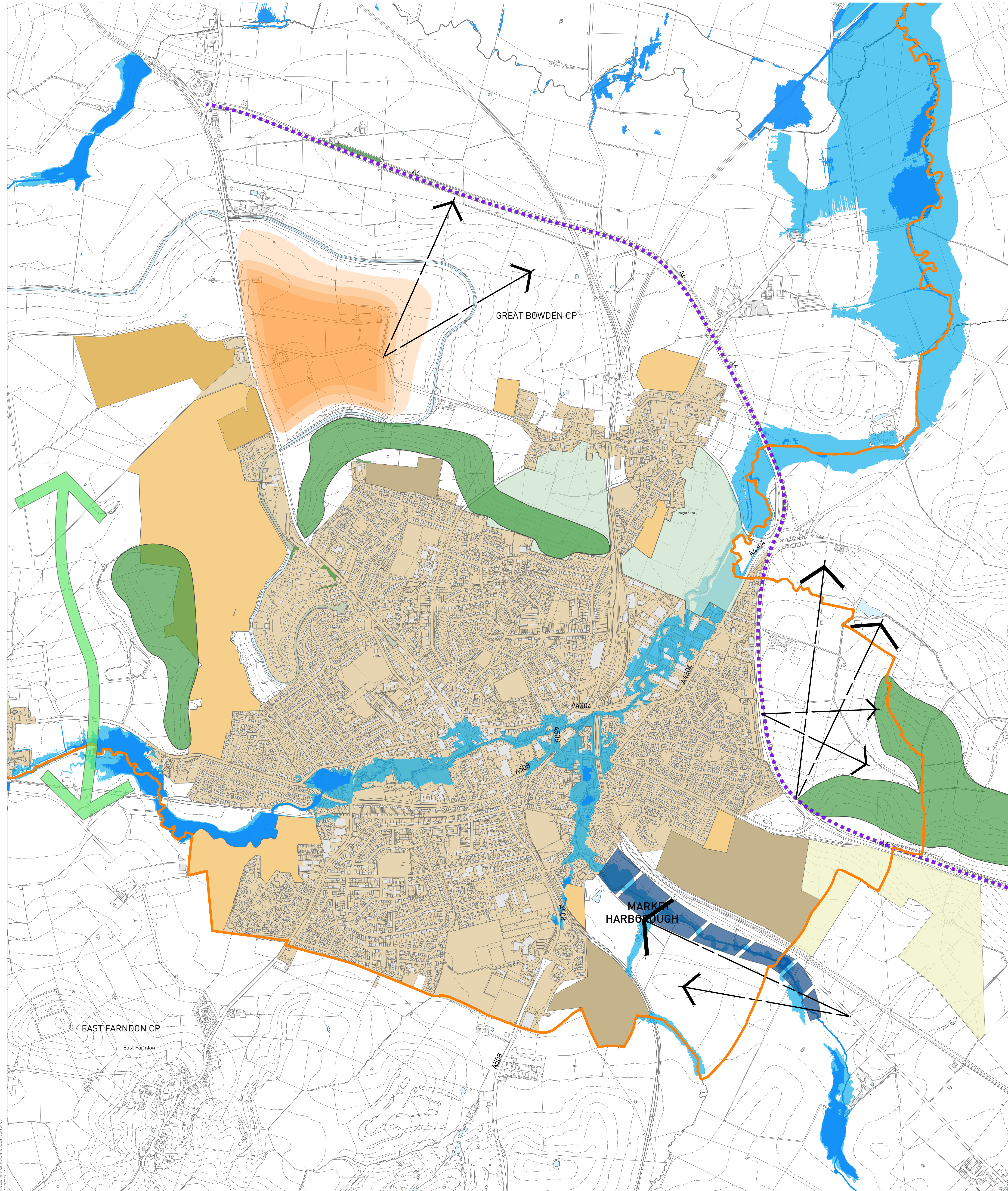
Eastern Edge of Market Harborough

- 2.16 The existing settlement edge runs up to the A6 highway corridor, south of which the land is already allocated/committed for development. The parcel of land

directly east of the A6 (having been identified as Moderate/Low sensitivity on the 2009 Market Harborough Landscape Character Assessment and Capacity Study) is less constrained but is physically (and generally visually) separated from the existing urban area by the road corridor, which with its vegetation infrastructure and various cutting/embankment profiles serves to form a particularly well defined and robust boundary to this edge of the settlement. There are also several long-distance views across this parcel to the north and east.

Western edge of Market Harborough

- 2.17 The entire existing western edge of the settlement is committed for residential and also business allocation/commitments, from Farndon Road at the south-western corner of the settlement, to Gallow Field Road in the north, the majority of which lies across the former Airfield Farm site in very close proximity to the Grand Union Canal corridor. There is a ridge to the west of this expansion area and this land also serves to separate the town of Harborough from the village of Lubenham. As such, this edge of the settlement is very constrained in terms of further development potential.
- 2.18 Consequently, opportunities for further growth and development on the edge of Market Harborough are somewhat limited given the various constraints in terms of emerging development and physical and environmental issues. These are illustrated on the plan at **Appendix A: Market Harborough: Existing and Emerging Constraint Baseline**.
- 2.19 The above therefore identifies some of the constraining factors around the town and the potential for the area of land around and including the proposed cemetery allocation to constitute a future candidate to accommodate some of that housing growth.
- 2.20 In that context, the development of a cemetery at the proposed allocation site would significantly compromise this location as a potential future growth option. This provides further weight to the soundness flaw identified above to require the proposed allocation at Policy GI3c to be deleted.



KEY

General	Emerging Development	Physical and Environmental Constraints	
Proposed Development Area	Business/ Commercial Allocations	Flood Zone 2	Low Lying River Corridor
Existing Urban Extent	Housing Commitments	Flood Zone 3	A6 Highway Corridor
Harborough District County Boundary	Housing Allocations	Area of Separation: Market Harborough and Great Bowden (ref. HDC Policy)	Area of Separation: Market Harborough and Lubenham (ref. HDC Policy)
	Braybrooke Solar PV Park	Prominent Topographical Ridges/Slopes	Long Distance Views towards/From Settlement

