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Date: 10/10/2018

Mr J Bore
Planning Inspector
c/o Mr I Kemp
Programme Officer

By email only: ikemp@icloud.com

Dear Mr Bore

HARBOROUGH LOCAL PLAN – COMMENTS ON PROPOSED REVISIONS TO POLICY GD2 (EXAM7)

On behalf of Davidsons Developments, Bidwells welcome the opportunity to comment on the revised wording of policy GD2 to help inform your conclusions on its soundness.

The proposed change to split the policy into two parts is supported as it makes it clear that the policy is relevant to proposals both within and adjacent to settlement boundaries. The change also makes clear the different criteria that apply to proposals adjacent to settlement boundaries as opposed to proposals within the limits of development.

The general intention of policy GD2 is supported and, in our view, is an important part of the plan. It is our understanding that the intention of the policy is to allow for an element of flexibility in land supply and to enable continued growth, of an appropriate scale, in sustainable locations, over and above that currently planned for.

Given this purpose, we have concerns about the specific wording of part 2 of the policy which a) does not fully reflect the discussions at the hearing session on Thursday 4th October and b) does not provide sufficient clarity to enable the effective implementation of the policy.

The inclusion of the word 'and' at the end of bullet c suggests that part two of the policy only allows for sites which involve redevelopments/conversions and brownfield land to come forward adjoining settlement boundaries. Our understanding was that the policy should allow suitable greenfield land to come forward for development on edge of settlement sites, providing they are suitable and of a scale suitable for the size and role of the settlement. The revised wording therefore seems at odds with this approach. This can be amended by changing 'and' at the end of bullet c to 'or'.

Related to this point, bullet d would benefit from additional wording to clarify that it covers greenfield development. The following amendment to the start of bullet d is suggested (Deleted text ~~struck through~~, **new text bold and underlined**):

d. ~~Its scale~~ **In the case of greenfield land**, the scale of development....

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With regards to the implementation of the policy, we still have concerns that the policy does not provide sufficient clarity to allow it to be effective. The amendments do not make it clear how matters of scale will be addressed, either in relation to individual sites or cumulatively. As expressed at the hearing session, our view is that the appropriate scale of additional growth for each settlement should be related to the current dwelling stock rather than the level of proposed allocations (as was suggested by the Council) and that this should be reflected in the policy wording and not the supporting text. The revisions to the policy do not address this point. They also do not address matters of individual site scale and there remains a concern that the policy could lead to a 'race to committee' without guidance on the size of site that would be acceptable.

Whilst we do not wish to overly restrict development, particularly in sustainable locations such as Broughton Astley, it is important that the policy has parameters in place to guide development and allow effective decisions to be made. Therefore, it is suggested that an additional bullet is required after bullet d, which clarifies matters of scale. This should then be linked to the remaining three bullets (currently referred to as e to g) which would effectively become sub-points of the new bullet e.

This additional bullet in our view should allow a greater quantum of development in the Key Centres, which are by reference to their role in the settlement hierarchy, the most sustainable locations for growth. Therefore, suggested wording for an additional bullet is:


e. Generally development permitted under this policy should not cumulatively exceed 10% (15% for Key centres) of the number of homes in the host settlement. Individual sites should be for no more than x dwellings, unless individual site characteristics justify a higher figure. Development proposals should also be:

To further enhance the policy, it could be linked to a table which sets out the current housing stock and the additional level of development that would be allowed under this policy. This could be set out in an Appendix to the Plan. It is felt that this would provide certainty for all parties and allow effective monitoring and implementation of the policy.

We would also note that the supporting text for the policy will need to be updated. In particular, as noted above, we feel that it would be more appropriate for the limits to development that would be allowed under the policy to be explicitly stated within the policy rather than in the supporting text as is currently the case (See paragraph 4.3.4 of the submission plan).

We hope this note is of assistance to you in considering the soundness of the policy and we look forward to seeing your recommendations in due course.

Yours sincerely,



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Associate

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