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10th October 2018

Sent by email to idkemp@icloud.com

Ian Kemp
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Dear Ian

**Harborough Local Plan Examination
Matter 6 – Proposed Modification to Policy GD2
Representations on behalf of Manor Oak Homes**

We refer to the Inspector's request for comments on the Council's proposed modification to Policy GD2 and are pleased to now provide representations prepared on behalf of our client, Manor Oak Homes. Following the detailed discussion regarding Policy GD2 at the Matter 6 hearing session on 4th October 2018, Manor Oak Homes is extremely grateful for the opportunity to comment on the proposed modification.

Please see our detailed comments on the modified policy below. In summary, we are very disappointed that the Council have completely misunderstood the nub of discussions at the hearing session which focussed on the need for the policy to provide flexibility in the delivery of housing in sustainable locations adjoining existing built up areas and for clarity regarding the application of the 10% allowance in the definition of 'significantly exceeding' the target for the delivery of new homes in each settlement.

Background – Housing Target for the Kibworths

We have previously raised detailed concerns regarding both the position of the Kibworths in the settlement hierarchy and the decision of the Council to amend paragraph 5.1.17 to make it clear that the residual housing requirement in certain centres, including the Kibworths is zero. We do not wish to repeat these arguments here, but it is suffice to say that we consider that this approach would impose a severe restraint on the delivery of sustainable development over the plan period and fails to recognise the sustainability credentials of the Kibworths and its capacity and suitability to accommodate development beyond that currently committed.

With regards to discussions at the hearing session, we do however wish to clarify what the population of the Kibworths is as there was some confusion on the part of the Council on this point. As set out in our representations to the Regulation 19 consultation, the population of the Kibworths (i.e. Kibworth Beauchamp

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and Kibworth Harcourt combined) was 5,433 at the 2011 census, but with completions since 2011 this has risen to c.6,500 and with existing commitments is set to rise again to c.7,500. In comparison with the other Rural Centres, the majority of which have populations of c.1,000-1,500 and the Key Centres, that have populations of c.9,000, it is clear that the Kibworths are far more similar in size to the Key Centres in terms of its size and the role it plays in the settlement hierarchy.

Policy Approach Set Out at the Matter 6 Hearing Session

With respect to our representations regarding the role of Kibworth and the restraint posed to its sustainable development by the proposed zero home housing requirement, we were encouraged by the discussions at the hearing session on Matter 6. During these discussions, the Council explained that it was never their intention in the wording of Policies H1 and GD2 to 'pull up the drawbridge' on development in the Kibworths, but rather to design a policy that allowed for flexibility in housing delivery. Furthermore, the Council explained that it was their intention for the 10% figure set out at paragraph 4.3.4 (i.e. the figure that housing targets should not normally exceed) to apply to both the targets set at Policy H1 and to existing completions and commitments (i.e. to the entire planned housing growth in a settlement during the plan period). This approach would importantly provide sufficient flexibility in the Kibworths to allow for an additional 90 dwellings (i.e. 10% of the 901 completions and commitments) to come forward to 2031 to meet local and district wide housing needs. The benefits of such an approach are numerous and include:

- The allowance for flexibility in the housing market to respond to fluctuations in demand and supply. This is arguably more important in settlements without a housing target set by Policy H1 as it is in these settlements where, following the completion of existing commitments, there is no allowance for additional growth without the 10% figure.
- It would enable a continuous supply of homes to be delivered in Kibworth and other similarly affected settlements during the latter years of the plan period. One of the key issues with not allocating any sites in the Kibworths and setting a housing target of zero in Policy H1 is that it will restrict housing growth during the latter part of the plan period. As detailed in our previous reps, and accepted by the Inspector, the vast majority of the Kibworths' completions since 2011 are in fact best described as meeting unmet need from the previous plan period on site allocation KB1. This allocation has now been completed and while there are several committed sites in the Kibworths, these will all be built out over the next few years, leaving a gap in delivery during the latter years of the plan period.
- It would allow for any lapse in the delivery of current commitments to ensure that the Kibworths deliver the currently estimated 901 homes as a minimum.

With respect to the above, it should also be noted that in their Responses to the Inspector's Initial Questions (August 2018), the Council state in response to Question 11 that:

"Policy GD2 would allow housing development to come forward in sustainable settlements with a residual requirement of zero where proposals meet the relevant criteria. As such, appropriate development would occur in these sustainable locations."

As is set-out below, it is clear that the Councils modified wording of Policy GD2 would fail to allow for any development, aside from very small infill sites within the built-up area, to come forward in the Kibworths despite its clear sustainability as a location for development.

Proposed Modification to Policy GD2

The Council's proposed modification to Policy GD2 would only allow development adjoining the existing or committed built up area of settlements where:

(a) it is needed to meet the settlement's housing requirement in policy H1, taking into account existing completions and commitments; or

(b) it is necessary to meet an identified district-wide housing need, or local housing need as evidenced through a housing needs survey or a neighbourhood plan; or

This approach is clearly far less flexible and would be far less responsive to local housing needs than the policy discussed at the hearing session, which we thought was an agreed approach that the Council would be taking forward. This revised policy would in a very real sense 'pull up the drawbridge' on any additional development in the Kibworths (and other similarly affected settlements) during the plan period other than that already committed. The effect of this will be a moratorium on housing delivery in one of the most sustainably settlements in the district during the latter part of the plan period.

Our Proposed Change

To ensure the Plan is justified and effective, the following changes are considered necessary to the Council's modified wording of Policy GD2.

Criterion a should be amended as follows to allow development adjoining the existing or committed built up area of settlements where:

a. it is needed to meet the settlement's housing requirement in policy H1, taking into account existing completions and commitments. in the case of housing, it does not, cumulatively with other proposals, significantly exceed the combined level of growth for that settlement set by the Local Plan, including completions since 2011, existing commitments and the housing targets set by Policy H1;

The Council have not formerly proposed any changes to the supporting text of Policy GD2, but in light of the discussion at the hearing session for Matter 6, we consider that Paragraph 4.3.4 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 where additional growth is required to meet the spatial strategy in line with Policy SS1. These target figures are linked to ensuring that the District's housing requirements are met in accordance with the spatial strategy 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 and that the combined level of growth (completions since 2011, existing commitments and housing targets set by Policy H1) for each settlement set by the Local Plan is flexible and responsive to local housing needs. 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%.

We trust that these representations will be given due consideration in the Inspector's consideration of Policy GD2.

If it assists the inspector to reach a conclusion on this matter, we would suggest that another session at the EIP be organised to deal with this matter.

Should you have any queries or require any further information at this stage, please do not hesitate to contact either myself or my colleague, Lynsey Rigg.

Yours faithfully

A handwritten signature in black ink that reads "Geoff Armstrong". The signature is written in a cursive style with a large initial 'G'.

Geoff Armstrong (geoff.armstrong@arplanning.co.uk)

Director

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