

## **Examination of Harborough Local Plan 2011 to 2031**

### **Statement on behalf of Bloor Homes Ltd**

#### **Submitted by Define Planning & Design Ltd**

#### **Matter 6 – Policy GD2**

1. The Inspector will be aware of our concerns in relation to the soundness of the Local Plan, both in respect of the delivery of the Strategic Development Areas and its failure to effectively address the unmet needs that are already arising elsewhere in the Housing Market Area. We understand that the Local Plan Review Policy is to be modified to mitigate those concerns, but the NPPF's presumption in favour of sustainable development requires the Local Plan to be sufficiently flexible to adapt to rapid change (para 14), and in any circumstances a Local Plan Review is a lengthy time consuming process (as evidenced by the District Council's view of the timescales that should be included in the review policy). Policy GD2 would enable the timely development of unallocated sites in sustainable locations that accord with the Local Plan's spatial strategy and the criteria set out in the policy. It is, therefore, essential in providing the NPPF's required flexibility and ensuring that it will be effective in addressing the identified housing needs.
2. It is understood that the policy is to be modified to separately address sustainable development opportunities within and adjacent to settlements. In doing so, however, it is crucial that the flexibility it provides to enable housing at the higher echelons of the settlement hierarchy is retained and that an artificial limit on development at the PUA, sub Regional Centre and Key Settlements is not now imposed (as was the case in the original amendment proposed by the District Council in their statement in relation to Matter 6).
3. The latest version of the policy proposed by the District Council goes some way to addressing the various concerns aired at the Hearing Session, albeit the circumstances referred to relate to development being permitted where it is needed to either meet the settlement's housing requirement (part 2a), the District's wider housing need or a local housing need (part 2b). Consequently it does not recognise that the District housing requirement is a "minimum" level of provision, or circumstances where the SDA's are failing to deliver (which may be evidenced by a 5 year housing land supply shortage) or that a development proposal adjacent to the PUA could address the unmet needs that are arising in Leicester.
4. It is recognised that the scale of development in lower tiers of the settlement hierarchy should be limited to ensure that the Local Plans' spatial strategy is not fundamentally undermined. It is, however, illogical to limit the wider socio-economic benefits of facilitating sustainable development in the most sustainable locations within the District, particularly as any concerns in relation to the scale or cumulative impact of development in these locations is effectively addressed by the other criteria within the policy, notably part 2d.
5. It is suggested, therefore, that part 2b is revised as follows:

*“located at the PUA, sub Regional Centre and Key Settlements the development would contribute to ensuring that the minimum housing requirement for the District is met within the plan period and/or the maintenance of a continual deliverable five year land supply, or it would address an*

*unmet need arising elsewhere in the HMA adjacent to the PUA, or it is necessary to meet an identified Local Housing Need”.*

6. The policy wording also need to make clear that parts 2d-g also apply to all schemes being justified under parts 2a-c.