



Harborough Proposed Draft Local Plan 2020 – 2041 (Regulation 19 Consultation)

Land North of Wistow Road, Kibworth

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Harborough Proposed Draft Local Plan 2020 – 2041 (Regulation 19 Consultation)

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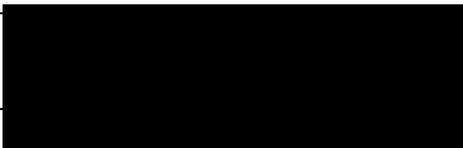
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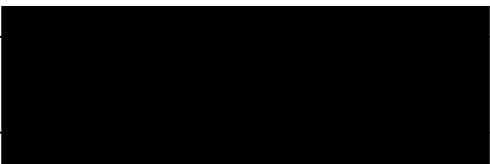


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1 Introduction

1.1 Introduction

- 1.1.1 Stantec is instructed by Bloor Homes to prepare representations to the Harborough Draft Local Plan 2020 – 2041 (Regulation 19) consultation, including relevant documents within the evidence base.
- 1.1.2 These representations follow the structure of the Draft Local Plan consultation documents and seek to respond to the questions posed within the document, where relevant.
- 1.1.3 Bloor Homes are working collaboratively with the landowners to bring forward a residential led development at Land North of Wistow Road, Kibworth (the 'Site').
- 1.1.4 Bloor Homes **does not support** the non-allocation of the Site in the Draft Local Plan and encourages the Council to review its assessment of the Site.
- 1.1.5 These representations relate to the following Draft Harborough Local Plan 2020 – 2041 Regulation 19 consultation documents:
- Harborough Draft Local Plan 2020 – 2041;
 - Harborough Draft Policies Map;
 - Harborough Draft Sustainability Appraisal;
 - Harborough Proposed Submission Draft Evidence Base Documents.
- 1.1.6 Bloor Homes welcome the opportunity to comment on the Draft Local Plan and look forward to engaging with the Council further in respect of the delivery of the Site.



2 Land North of Wistow Road, Kibworth

2.1 The Site Context

- 2.1.1 The Site is shown outlined in red on the Site Location Plan (Drawing No. BM-M-01) which can be found at **Appendix A**. The Site extends to approximately 15.12 hectares and is comprised of agricultural land. To the south-east of the Site lies an established residential development with Priory Business Park situated opposite. The remainder of the site is surrounded by open countryside.
- 2.1.2 The southern end of the Site is bounded by Wistow Road. The A6 is to the east of the Site and extends north to Leicester. There are a number of bus services running through Kibworth with links to with links to Fleckney, Market Harborough and Leicester.
- 2.1.3 There are no Public Rights of Way (PRoW) through the Site or adjacent to the Site.
- 2.1.4 In terms of flood risk, the Site is located within Flood Zone 1 and therefore has a low risk of flooding. With regards to surface water flood risk, the majority of the Site is at a very low risk. There is a narrow stretch at the north and north-eastern edges of the Site which are subject to low, medium and high surface water flood risk, however this can be mitigated through the drainage strategy. Bloor Homes has a full and experienced consultant team appointed to the project.
- 2.1.5 There are no designated heritage assets located within or adjacent to the Site. With regards to ecological considerations, the Site itself is free from any formal ecological designations.
- 2.1.6 In terms of other considerations, the Site is relatively unconstrained. Consideration of access, landscape and visual impact can be appropriately addressed through the careful design of new junctions, highway improvements and associated landscape scheme.

2.2 The Development Proposals

- 2.2.1 The development proposals at Land North of Wistow Road, Kibworth, seek to deliver the following benefits:
- The delivery of up to 150 residential dwellings in a range of house types and tenures to suit all local needs;
 - The provision of 40% affordable housing;
 - Incorporation of a responsive design that reflects local distinctiveness and Site context;
 - New vehicular access from Wistow Road / A6;
 - Development parcels nestled within high quality open space;
 - Retention and enhancement of existing soft landscape features where possible to enhance biodiversity and maintain Green Infrastructure within the Site;
 - New portions of public open space,
 - The delivery of 10% Biodiversity Net Gain; and



- The provision of SuDS and drainage infrastructure to help reduce flood risk onsite and in the locality.

2.2.2 Kibworth lies within the Settlement Hierarchy's Tier 3 (Large Villages). It has a good range of services and facilities including a secondary school. It is considered that the Site can provide a well-designed and appropriately proportioned development which would integrate comfortably with the existing built-up area. There are no known constraints within the development area which cannot be mitigated.



3 Proposed Draft Local Plan Submission Document – Regulation 19

3.1 Local Plan Vision

- 3.1.1 The Local Plan vision for Harborough sets out the Council’s vision for how the District will evolve from the period 2020 – 2041. The Council state that “*by 2041, the communities and residents of Harborough District will have benefitted from the development of new homes and workspaces whilst the place maintains its mainly rural character*”. Bloor Homes **support** the recognition by the Council that the delivery of new homes will bring about a range of benefits for residents and the local community.
- 3.1.2 Paragraph 22 of the National Planning Policy Framework (‘NPPF’) (December 2024) informs that strategic policies should look ahead over a minimum 15 year period from adoption to anticipate and respond to long-term requirements and opportunities. The Council issued an updated Local Development Scheme (‘LDS’) (February 2025) on 3rd March 2025 which sets out the timetable for the preparation of the new Local Plan. The LDS proposes the following timetable:
- Regulation 18 Issues and Options Consultation – January / February 2024;
 - Regulation 19 and 20 Proposed Submission Local Plan Consultation – March – May 2025;
 - Regulation 22 Submission Local Plan for Examination – September / October 2025; and
 - Regulation 26 Local Plan Adoption – October – December 2026.
- 3.1.3 As currently proposed, the LDS recognises the need to comply with paragraph 22 of the NPPF and anticipates that the new Local Plan will be adopted by December 2026. A Plan period of 15 years is therefore proposed to 2041. Albeit should any delays be anticipated to the proposed timetable for the new Local Plan which prevents a minimum period of 15 years post adoption, the Council would need to take this into account and have due regard. However, like many stakeholders, we consider it vital that the new Local Plan is adopted as soon as possible and avoids any further delays.
- 3.1.4 The Local Plan vision goes on to inform that new development will complement the established townscape and offer a range of housing options, including affordable housing. A well-designed development across the Site would provide housing within a sustainable location, adjacent to existing development. This is **supported** by Bloor Homes.
- 3.1.5 The vision also recognises the need for residents in new communities to benefit from improved access to local services and community provision, including recreational facilities. Development of the Site presents an opportunity to enhance and increase provision of walking and cycling routes, and provide new public open spaces, play areas and sustainable connections to Kibworth which has a range of local services and facilities. As such, this is **supported** by Bloor Homes.
- 3.1.6 The vision then concludes that residents will shape new development across the District through effective community engagement and proactive neighbourhood planning. This approach is supported by Bloor Homes and state a commitment to engage with Kibworth Harcourt and Beauchamp Parish Councils.



3.2 Introduction

3.2.1 As set out at paragraph 1.3 of the Draft Local Plan Consultation Document, the new Government requires every Local Planning Authority to have an up to date Local Plan. From previous discussions with Officers, it was confirmed that Harborough District Council are seeking to progress the Draft Local Plan under the transitional arrangements set out at Annex 1 of the NPPF. It is therefore acknowledged that the new Local Plan will need to meet 80% of the Standard Method requirements and will be examined under the previous version of the NPPF (December 2023). This is further recognised at paragraph 1.8 of the Draft Local Plan Consultation Document. Notwithstanding this, a future planning application that is submitted for the Site will be considered and determined under the updated NPPF (December 2024).

3.2.2 For the purpose of this submission therefore, any further references to the NPPF will be to the 2024 version unless stated otherwise.

3.3 Development Objectives

3.3.1 The Plan objectives, in overall terms, provide a guiding framework for the Plan's policies and proposals. A total of five objectives are proposed by the Council within the Draft Local Plan. These objectives have been detailed below and our responses to each objective can be found in orange.

- **Delivering Homes** – Deliver the housing needed, provide housing that addresses the specific needs of different communities and age groups, including the provision of affordable, accessible and specialist housing;
- Bloor Homes **support** the Council's objective of delivering the housing needed for the District during the Plan period. It is considered that this aligns with paragraph 61 of the NPPF and supports the Government's objective of significantly boosting the supply of homes, especially where they help to meet an area's identified housing need, including with an appropriate mix of housing types. The Site is proposed as having a capacity of up to 150 homes (albeit the Council has previously stated identified the Site as having a capacity of up to 284 homes) and is able to help the Council meet their development needs in a sustainable location in Kibworth. The proposals will see the delivery of 40% affordable housing onsite to meet the needs of the local area and will deliver a range of housing types and tenures (details subject to future Reserved Matters). It is therefore considered that further site allocations should be considered.
- **Creating Jobs and Diversifying the Economy** – Support vibrant town centres to adapt to changing needs and retain and provide employment land and create opportunities for business expansion, job creation and economic growth;
- Whilst there are no specific comments to be made regarding this objective, Bloor Homes wish to emphasise that development of the Site would sustainably contribute towards economic growth within Kibworth and support those seeking to live and work within the locality.
- **Tackling Climate Change and Enhancing the Natural Environment** – Reduce carbon emissions and implement climate adaptation strategies, improve the quality of the natural environment by reducing pollution, protecting, enhancing, and extending biodiversity, and creating Green Infrastructure;



- Bloor Homes **support** the Council's commitment to supporting the environment and seeking to tackle climate change. To ensure that development sites are considered on an individual basis, it is considered that the relevant policies within the Draft Local Plan should have regard to this and be worded flexibly where appropriate.
- **Retaining and Celebrating our Heritage and Rural Character** – Thoughtfully accommodate development to preserve and enhance our rural landscape, built heritage and the vitality of rural communities;
- Bloor Homes have no further comments to add to this objective at this moment in time. However, Bloor Homes reserve the right to comment on this further as the Draft Local Plan progresses.
- **Enabling Supporting Infrastructure** – Work with partners to deliver infrastructure (including schools, health and transport), supporting healthier communities through active and sustainable travel, expanding access to open spaces and expanding and enhancing community facilities;
- Bloor Homes **support** the Council's objective of delivering infrastructure and supporting healthier communities through active and sustainable travel, whilst expanding access to open spaces and enhancing community facilities. It is considered that by allocating developments such as 24/12186, the Council will be able to ensure that this objective is achieved during the Local Plan period. The Site has the capacity to incorporate a multitude of benefits for both new and existing residents including community infrastructure, potential recreation ground expansion, public open space, onsite footways and cycleways. It is therefore considered that allocation of the Site should be reconsidered to ensure there are sufficient sites to achieve this objective.

3.3.2 On the whole, Bloor Homes **support** the Local Plan objectives in principle and their ability to meet the longer-term vision for Leicester and Leicestershire. It is considered that development of Land north of Wistow Road would contribute significantly towards meeting the development objectives and regard should be had to this by the Council.

3.4 Policy DS01 – Development Strategy: Delivering Homes

3.4.1 In terms of housing, paragraph 61 of the NPPF informs that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. The overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community.

3.4.2 Policy DS01 of the Draft Local Plan sets out that the housing requirement for Harborough District consists of 13,182 dwellings between 2020 and 2041. The annual housing requirement for Harborough is then broken down to 657 dwellings per year between 2020 to 2036 and 534 dwellings per year between 2036 to 2041. As previously referenced, we are aware that Harborough District Council are progressing the Draft Local Plan under the transitional arrangements set out at Annex 1 of the NPPF. It is therefore acknowledged that the Harborough Local Plan will need to meet 80% of their updated Standard Method requirements or accord with the previous figures of the Standard Method should this equate to 80% of the updated Standard Method requirements.

3.4.3 In context to the above, it should be stressed that local housing **need** is not the same as the housing **requirement** to be set out in the Local Plan. The Council should therefore consider



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whether it is appropriate to set a higher housing requirement in line with paragraph 67 of the NPPF. This includes the consideration of unmet housing needs from neighbouring authorities and delivering additional development to meet prevailing affordable housing need.

- 3.4.4 The Standard Method for Harborough District has now been updated to make provision for 723 dwellings per annum. Previously under the former Standard Method, Harborough District Council were required to deliver 510 dwellings per annum. Regard is also had to the unmet housing needs arising from Leicester City and the requirement for Harborough District Council to provide an additional 123 dwellings per annum between 2020 to 2036 to meet this need.
- 3.4.5 We note that as part of the previous Regulation 18 consultation for Harborough, three growth options were presented for the scale of housing requirement during the Plan period. These included:
 - 1) Option A (534 homes per year) – Low Scale of Growth
 - 2) Option B (657 homes per year) – Medium Scale of Growth
 - 3) Option C (780 homes per year) – High Scale of Growth
- 3.4.6 In representations to the Regulation 18 consultation, the point was made that if the Council pursued Option B, then enough land would be provided to accommodate an additional 123 dwellings annually across the period 2020 to 2036 towards the wider housing shortfalls of Leicester City Council. However, as per Planning Practice Guidance (PPG), paragraph ID: 68-001-20241212 states “*The Standard Method for calculating local housing need provides a **minimum number of homes** to be planned for. **Authorities should use the Standard Method as the starting point** when preparing the housing requirement in their Plan, unless exceptional circumstances justify an alternative approach*”. With this in mind, Option B (657 dwellings) should therefore be considered as a minimum figure and a starting point for calculating the requirement.
- 3.4.7 To enable the housing needs for the whole Plan period to be met, it is essential that sufficient headroom is provided within the housing supply. This will ensure that any currently unknown unmet needs of Leicester are met and any issues relating to affordability are addressed. As set out within the Harborough Local Housing and Employment Land Evidence (February 2025), 421 affordable homes are required per annum to address affordable needs. To ensure 421 affordable homes are delivered per annum, reliance on the Standard Method alone would not meet this identified need. As such, if the affordable housing need alone is to be met, this will require 1,053 dwellings per year (based on 40% affordable housing requirement, as set out at Draft Policy HN01 (Housing Need: Affordable Homes)). It is important that sufficient dwellings are provided to address affordability issues within the District.
- 3.4.8 The table below takes account of the minimum housing need figures under the previous Standard Method requirement (as per Annex 1 of the NPPF for transitional arrangements), in comparison to the actual need figures which consist of the previous Standard Method, affordable housing needs and unmet needs within Leicester and Leicestershire. When comparing the below figures against the proposed Draft Local Plan figures of 657 dwellings per year between 2020 to 2036 and 534 dwellings per year between 2036 to 2041, it is apparent that the proposed figures in the Draft Local Plan are a fraction of the actual need figures which are required within Harborough during the Plan period. Therefore, the Council’s approach to calculating its overall requirement is incorrect, principally due to the conflation between housing need and housing requirement.



Plan Period 2020 - 2041	Stantec’s Option A – Harborough’s Local Housing Needs	Stantec’s Option B – Harborough’s Local Housing Needs, including Affordable Housing Needs and Unmet Needs from Leicester and Leicestershire
Dwellings per annum	510	1,053 + 123 = 1,176

- 3.4.9 Further to the above, we have reviewed the supporting evidence base in relation to housing and the new Local Plan, including the Harborough Local Housing and Employment Land Evidence (February 2025) and the Local Plan Development Strategy (February 2025). It is apparent when reviewing the Local Plan Development Strategy in particular that the document has not been suitably updated and still continues to make reference to the NPPF (December 2023) and the previous Standard Method figure of 534 dwellings. Whilst the Harborough Local Housing and Employment Land Evidence is based on more up to date information, in accordance with paragraph 36 of the NPPF (December 2024) and for the reasons set out above, it is considered that Draft Policy DS01 is not positively prepared, justified or consistent with national policy.
- 3.4.10 It is therefore considered that there is a need for Harborough District Council to plan for a higher level of housing growth than the minimum Local Housing Needs as calculated using the Standard Method. This will allow ongoing flexibility to ensure local and unmet housing needs can be met in full during the Plan period. As such, it is considered that the Council should review the housing figures proposed within the Local Plan and the supporting evidence base.
- 3.4.11 In addition to the above, it is acknowledged that the housing target set out in policy DS01 has been used to inform the site selection process to assess all sites put forward around Kibworth. This has then been used to help determine that the Site (24/12186) is not an appropriate location for development when compared with other locations and sites at Kibworth. However, as outlined above, within the context of having an increased housing requirement, additional sites must be considered. Within Kibworth, the Site was one of nine sites discounted at Stage 4 of the technical assessment stage. Of these sites, it is the largest by some margin and as such has the greatest capacity for achieving the aims of the policy as well as the overarching vision and objectives set out above. During the assessment of the site, set out in the Site Selection Methodology (February 2025) the Council concluded that the Site would form a logical extension to a settlement, is of an appropriate scale in relation to the settlement function and would not compromise any Areas of Separation or impact on a Green Wedge. Furthermore, there are limited technical constraints and those which are present can be mitigated.
- 3.4.12 On this basis it is considered that the Site should be reconsidered for allocation to ensure the needs of Kibworth and the wider area are met in both the short and long term and are accommodated on a single sustainable site.
- 3.4.13 Bloor Homes therefore do **not support** policy DS01 and consider that the policy as drafted is not currently **positively prepared or effective**.
- 3.4.14 We consider that the following amendments would make the policy sound, as per the requirements set out at paragraph 36 of the NPPF:



- Plan for 1,176 dwellings per annum to account for evidenced local housing needs, affordable housing needs, and the unmet needs of Leicester and Leicestershire, rather than the proposed 657 dwellings per year between 2020 to 2036 and 534 dwellings per year between 2036 to 2041
- Increase the number of site allocations within the Local Plan area including the Site north of Wistow Road, Kibworth, in order to ensure there are sufficient sites to contribute to the evidenced needs for 1,176 dwellings

3.5 Policy SA01: Site Allocations

- 3.5.1 Policy SA01 lists the proposed site allocations which will support and enable the delivery of the development strategy policies listed within the Draft Local Plan. Policy SA01 advises that the Council will seek to enter into a Planning Performance Agreement with promoters of strategically important sites to ensure a programmed approach to determination and site delivery / implementation.
- 3.5.2 The Site is not a preferred allocation in the draft Local Plan as it was discounted at Stage 4 of the Assessment. Whilst the Assessment identified no significant constraints, it concluded that development of the Site would not be in keeping with the character and it has minimal connection to the built form of the existing settlement and extend into the open countryside.
- 3.5.3 Contrary to the above assessment, the proposed development would be adjacent to the existing residential development to the east and south-east of the Site. To the south the Site would be bounded by Wistow Road. Directly opposite is the Priory Business Park. There is a large expanse of development permitted to the south and west of the business park which will increase the built form in this location. Based on these relationships, and the lack of brownfield sites in Harborough and particularly in Kibworth, it is considered necessary to develop within the countryside. The Stage 3 Assessment has already concluded that the Site would form a logical extension to the established settlement area of Kibworth.
- 3.5.4 It is understood that the Strategic Housing and Economic Land Availability Assessment Update (2024) has provided the basis for not including the Site within the list of allocated sites and instead focus residential development at Land west of Warwick Road (Site Ref. K1) with a total of 475 homes proposed. Given the above assessment in regard to housing requirement, it is considered that additional allocated sites are required. The Site represents an ideal development opportunity to increase housing provision in a sustainable location.
- 3.5.5 Bloor Homes consider that the policy as drafted is not justified as it does not reflect evidenced based needs. Further allocated sites are required to meet the Council's housing requirements and as such restricting development within Kibworth to the K1 would not be appropriate. Bloor Homes do not consider the draft list of allocated sites to be **justified** or based on **sound** evidence. Bloor Homes therefore wish to see the allocation of the Site in order to increase the housing provision within Kibworth. They also wish to comment further on any reconsideration of the site.

3.6 Policy HN01 – Housing Need: Affordable Housing

- 3.6.1 Paragraph 66 of the NPPF informs that where major development involving the provision of housing is proposed, planning policies and decisions should expect that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures



- 3.6.2 Policy HN01 sets out that to meet the need for affordable housing (40%) of the total number of homes in residential developments of 10 or more dwellings, provision should be made for this onsite with a tenure split of 75% affordable / social rented and 25% affordable home ownership. The mix of size and type of affordable housing development will be informed by the latest housing needs assessment. New affordable housing should be well designed and integrated with market housing which contributes to the creation of mixed communities.
- 3.6.3 Based on the Harborough Local Housing and Employment Land Evidence (February 2025), the Local Plan document specifies that Harborough's affordable housing need consists of:
- 310 affordable homes for rent per annum; and
 - 111 affordable homes ownership per annum.
- 3.6.4 The supported Viability Report (January 2025) to the Draft Local Plan informs that new affordable housing should be delivered onsite unless exceptional circumstances can be demonstrated and robustly justified. The Viability Report demonstrates that the majority of draft allocations in the Draft Local Plan are able to support 40% affordable housing provision. The Viability Report also informs that the tenure split for affordable housing will consist of 75% affordable / social rent and 25% affordable home ownership. Where it is robustly demonstrated that the required provision of affordable housing would make a scheme unviable, the requirement for a lower level of provision will be considered. The Viability Report considers that for schemes of 500 dwellings or more, where a non-policy compliant scale of affordable housing is accepted as a result of viability issues, viability will be reassessed at agreed times over the lifetime of a development based on actual costs and values generated by the development.
- 3.6.5 It is understood that the above figures for affordable home ownership presents the highest possible requirements. When adding the above affordable needs together, it is apparent that a total requirement of **421 homes per annum** is needed to meet local affordable need. This figure equates to over half of the updated Standard Method figure of 723 dwellings and close to the previous Standard Method figure of 510 dwellings in which the Draft Local Plan is being assessed under. The figure of 421 affordable dwellings doesn't even consider market need. As such, this demonstrates that there is a clear need to account for a higher number of homes to address local affordable need in District.
- 3.6.6 Whilst the Council consider that the scale of affordable housing need is significant, they consider that their position is justified in seeking to maximise delivery on sites where possible. The Council go on to acknowledge that the affordable need within the District represents 2/3 of the proposed housing requirement. However, the Council consider that this level of affordable housing provision is unlikely to be deliverable and regard needs to be had to viability considerations and the acknowledgement that public funding is a constraint to affordable housing delivery.
- 3.6.7 It is evident that that the delivery of housing based purely on local need assessed via the Standard Method (i.e. 510 dwellings per annum) will not deliver sufficient market housing to fully meet the identified affordable need, if planning obligations remain the primary source of delivery. As set out at Section 3.4, if the affordable housing need alone is to be met, this will require 1,176 dwellings per year based on 40% affordable housing requirement.
- 3.6.8 Taking account of the above, the provision of 40% affordable housing onsite is **supported**. In terms of the tenure split, the provision of 75% affordable / social rented and 25% affordable is **broadly supported**, although this needs to be expressed with flexibility to allow for change over time.



3.7 Policy HN03 – Housing Need: Housing Type and Density

- 3.7.1 Paragraph 130 of the NPPF sets out that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. In these circumstances, the use of minimum density standards should also be considered. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range.
- 3.7.2 Policy HN03 advises that the Council will expect the following **minimum** residential densities unless a lower density is justified based on the character of the area and availability of public transport and other services and facilities:
- a) 40 dwellings per hectare within Lutterworth and Market Harborough town centres
 - b) 30 dwellings per hectare elsewhere
- 3.7.3 Bloor Homes wish to emphasise that the densities included within the policy should be viewed as a minimum. Bloor Homes reserve the right to comment further on this topic should the Site be reconsidered for allocation.

3.8 Policy HN04 – Housing Need: Supported and Specialist Housing

- 3.8.1 Paragraph 63 requires the size, type and tenure of housing needed for different groups in the community to be assessed and reflected in planning policies.
- 3.8.2 Policy HN04 sets out that specialist housing for older people will be required as an integral part of all residential developments of 100 dwellings or more at a rate of at least 10% of all dwellings proposed, providing the site offers a suitable location for the provision of this type of accommodation.
- 3.8.3 Whilst the evidence set out in the Harborough Local Housing and Employment Land Evidence (February 2025) indicates that in the future household sizes are projected to drop whilst the population of older people will increase, based on the evidence presented, it is unclear as to where the need for 'at least 10%' of all dwellings on sites of 100 dwellings or more as specialist housing has been presented. The Harborough Local Housing and Employment Land Evidence also confirms that there is no standard methodology for assessing the housing and care needs of older people. The policy also fails to clarify as to what types of development 'specialist housing' relates to. Therefore, the provision of 10% has not been positively prepared and is unjustified.
- 3.8.4 In regard to the above and to ensure that more flexibility is built into the policy, it is considered that a reduced percentage rate should be included within the policy to ensure that all developments of 100 dwellings or more can suitably accommodate a portion of specialist housing onsite. It is considered that a 5% contribution towards specialist housing is a more reasonable quantum that will be better accommodated by development sites. Whilst we acknowledge that the evidence prepared fails to justify the need for 10% specialist housing onsite and also doesn't make reference to the need for 5% specialist housing, Bloor Homes consider that a quantum of 5% is more reasonable and will be better accommodated within development sites. A quantum of 5% is also considered suitable given the evidence confirms that there is no standard methodology for assessing the housing care needs of older people.



- 3.8.5 Taking the above into account, Bloor Homes consider that policy HN04 fails to accord with the tests set out at paragraph 36 of the NPPF and is therefore not justified. It is considered that part 2 of the policy should be amended as follows to make policy HN04 sound:

“Specialist housing for older people will be required as an integral part of all residential development of 100 dwellings or more at ~~a rate of at least 10%~~ at an approximate rate of 5% or more of all dwellings proposed, providing the site offers a suitable location for the provision of this type of accommodation”

- 3.8.6 Bloor Homes therefore do **not support** the policy as currently drafted.

3.9 Policy HN05 – Housing Need: Self and Custom Build Housing

- 3.9.1 Under Section 1 of the Self Build and Custom Housebuilding Act 2015, Local Planning Authorities are required to keep a register of those seeking self-build and custom house building plots. Section 2 of the Act requires Local Planning Authorities to provide sufficient suitable permissions to meet the identified need on the register.

- 3.9.2 The NPPF informs at paragraph 73(b) that Local Planning Authorities should seek opportunities for small – medium scale sites to be delivered for self and custom housebuilding.

- 3.9.3 Policy HN05 sets out that in order to contribute to meeting demand for self and custom build plots, all non-specialise development of 40 dwellings (gross) or more must provide at least 10% of the total number of dwellings as self or custom build plots. Policy HN05 goes on to inform that a lower level of provision will only be permitted where there is clear evidence of lower demand. If plots on developments of 40 dwellings or more remain unsold for 18 months, then these plots may be built out as market housing.

- 3.9.4 The Harborough District Council Self and Custom Build Register suggests that there is a demand for 298 plots (as at 30 October 2024). Further to this, the Council have typically seen an average of 36 registrations a year for self and custom build plots. The Harborough Local Housing and Employment Land Evidence (February 2025) considers that there is a need for self and custom build units across the District. The Housing and Employment Land Evidence goes on to inform that despite a relatively permissive policy for self and custom build plots in the adopted Local Plan, the volumes of permissions have not matched registrations. As such, the Council have sought to tighten the policy framework under the Draft Local Plan, hence the 10% requirement for sites of 40 dwellings or more.

- 3.9.5 Whilst Policy HN05 includes a cascade mechanism should there be no interest in self and custom build plots on sites, the requirement for ‘at least 10%’ self and custom build plots as currently drafted is **not supported**. The requirement for 10% is considered excessive, even when considering the volume of permissions and registrations. Given the rate of demand detailed above, as well as other sites within the District and the draft allocations listed in the Draft Local Plan, the availability of plots would significantly exceed demand. As such, this would result in plots sitting vacant for extended periods of time which can lead to a range of issues such as security and fly tipping. This risk is obviously a shared concern of the Council’s, hence why a cascade mechanism is suggested within the draft policy.

- 3.9.6 With regards to the cascade mechanism, whilst it is positive to see that the Council have included this to support the provision of any unbuilt plots being built out as market housing, in reality this mechanism is **not supported** due to the build out implications and phased approach of the development. This could have significant implications for new residents onsite who would then have to endure construction works and traffic, whilst the proposed self and custom build



plots are built out for market dwellings. As such, this approach is not practicable or suitable. Further to this, it is also considered that the requirement for properties to remain unsold for a period of 18 months is excessive and a period of 12 months is more suitable.

3.9.7 We note that part 6 of the policy also requires detailed applications for self and custom build homes to have a plot passport and design code. It is considered that the need for a specific design code for these plots is excessive and will potentially delay self and custom houses coming forward for development. The policy also fails to specify who would be responsible for preparing the design code and what the process for this would entail. Therefore, this requirement should be removed.

3.9.8 In light of the above, Bloor Homes consider that policy HN04 fails to accord with the tests set out at paragraph 36 of the NPPF and is therefore not justified. The following recommendations are made to amend the wording of draft policy HN05 in order for it to be considered sound:

“To contribute to meeting demand for self and custom build plots, all non-specialist development of 40 dwellings (gross) or more must provide ~~at least 40%~~ ~~approximately 5%~~ of the total number of dwellings as self or custom build plots.

A lower level of provision will only be permitted where there is clear evidence of lower demand. If plots on developments of 40 dwellings or more remain unsold, these plots may be built out as conventional market housing subject to detailed permission being secured which must be supported by evidence that a thorough marketing exercise has been undertaken over a period of at least ~~18 months~~ ~~12 months~~ commencing from the date at which the serviced self or custom build plot was available.

~~Detailed applications for self and custom build homes on plots with a plot passport and design code will be supported where they adhere to the approved parameters of the plot passport and clearly demonstrate how specifications have been satisfied. Variations to plot passport specification must demonstrate that they are suitable for the plot if they are to be supported.”~~

3.9.9 Bloor Homes therefore do **not support** the policy as currently drafted.

3.10 Policy AP01: Development in Settlements

3.10.1 Paragraph 124 of the NPPF advises that planning policies and decisions should promote an effective use of land meeting the need for homes. Paragraph 126 adds that Local Planning Authorities should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development need.

3.10.2 Policy AP01 identifies Kibworth as a large village in the settlement hierarchy for Harborough District. This is after the market towns of Lutterworth and Market Harborough. Bloor Homes are pleased to see the Council's recognition of Kibworth as a sustainable location for growth within the District.

3.10.3 Bloor Homes have no further comments to raise in respect of policy AP01 and **support** the identification of Kibworth as a sustainable settlement capable of growth.



3.11 Policy DM05: Green and Blue Infrastructure and Open Space

3.11.1 Paragraph 135 of the NPPF informs that planning policies and decisions should ensure that developments optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space).

3.11.2 Policy DM05 informs that all development must:

- a) contribute to creating high-quality multifunctional green and blue infrastructure in accordance with the Open Spaces Strategy 2021 (or subsequent revisions) and Green and Blue Infrastructure Study (2024), including using trees and other planting where appropriate, to provide access to shade and manage surface water run-off as part of a wider resilience to climate change and, where needed, use noise and pollution barriers/absorption measures;
- b) create and enhance accessible links for all between new developments and surrounding recreational networks and facilities; and
- c) enhance access to publicly accessible open space.

3.11.3 Policy DM05 then goes on to advise that all residential developments of 10 or more dwellings must meet the requirements set out at 1a, 1b and 1c and meet the following local standards:



Open Space Type	Existing Standard (ha per 1,000 population)	Accessibility Standard
Allotments and Community Gardens	0.35	4km or 10 minutes by bus / driving
Amenity Greenspace	0.9	800 metres or 10 minutes' walk
Natural and Semi-Natural Greenspace	8.5	1.6km or 20 minutes' walk
Parks and Gardens	0.4	4km or 10 minutes by bus / driving
Provision for Children and Young People	0.3	400 – 800 metres or 5 – 10 minutes' walk
Outdoor Sports	In accordance with Playing Pitch Strategy	In accordance with Playing Pitch Strategy
Cemetery and Burial Grounds	In accordance with Open Spaces Strategy	In accordance with Open Spaces Strategy

- 3.11.4 The policy then considers that if onsite provision is not feasible by virtue of location, management limitations, or the open space will not be of a sustainable size, a payment equivalent to the offsite provision will be required.
- 3.11.5 Whilst Bloor Homes **broadly support** the principle and requirements of the policy, it is considered that in parts, the wording of the policy is too onerous and does not provide any flexibility. This is also applicable to the open space typologies and it is considered that more flexibility should be built into the accessibility standard. Bloor Homes therefore consider that policy DM05 fails to accord with the tests set out at paragraph 36a of the NPPF and has not been positively prepared. Therefore, in order for the policy to be considered as sound, justified and positively prepared, the amendments below are considered necessary to the wording of the policy.
- 3.11.6 The wording of the policy and accessibility standards prevent sites being considered on a site by site basis. It is also acknowledged that the Open Space Strategy was prepared back in 2021 prior to the Local Plan Review and for the purposes of the Draft Local Plan is now considered to be out of date. As such, an updated version of the Open Spaces Strategy should have been prepared in support of the evidence base for the Draft Local Plan.
- 3.11.7 Further to this, whilst the open space standards are helpful and provide guidance on the quantum's that are considered necessary for development, it is again considered that these standards do not provide any flexibility and fail to have regard to individual schemes. For example, should a development not provide all of the above open space typologies listed in the table, but provide an excess of some typologies, it is considered that due regard should be had to this by the Council and the wider application merits should be considered in the balance.



3.11.8 Having regard to the above, the following recommendations are made to amend the wording of draft policy:

“All development ~~must~~ should aim to:

- a. contribute to creating high-quality multifunctional green and blue infrastructure in accordance with the Open Spaces Strategy 2021 (or subsequent revisions) and Green and Blue Infrastructure Study (2024), including using trees and other planting where appropriate, to provide access to shade and manage surface water run-off as part of a wider resilience to climate change and, where needed, use noise and pollution barriers/absorption measures;
- b. create and enhance accessible links for all between new developments and surrounding recreational networks and facilities; and
- c. enhance access to publicly accessible open space.

Residential development of 10 or more homes ~~will~~ should aim to meet the requirements set in 1 (a) to 1(c) and local standards ~~where possible below~~ or as set out in up-to-date evidence of open space requirements published by the Council. Developments will be expected to provide an appropriate landscaping and landscape maintenance scheme, ensuring high standards of maintenance. ~~Due consideration will be had to the individual merits of development proposals and the open space types provided onsite~~

Residential development of 10 or more homes ~~will~~ should aim to meet the requirements set in 1 (a) to 1(c) and ~~the approximate~~ local standards below”

Open Space Type	Existing Standard (ha per 1,000 population)	Approximate Accessibility Standard
Allotments and Community Gardens	0.35	4km or 10 minutes by bus / driving
Amenity Greenspace	0.9	800 metres or 10 minutes' walk
Natural and Semi-Natural Greenspace	8.5	1.6km or 20 minutes' walk
Parks and Gardens	0.4	4km or 10 minutes by bus / driving
Provision for Children and Young People	0.3	400 – 800 metres or 5 – 10 minutes' walk
Outdoor Sports	In accordance with Playing Pitch Strategy	In accordance with Playing Pitch Strategy



Cemetery and Burial Grounds	In accordance with Open Spaces Strategy	In accordance with Open Spaces Strategy
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3.11.9 Bloor Homes therefore do **not support** the policy as currently drafted.

3.12 Policy DM06: Transport and Accessibility

3.12.1 Paragraph 110 of the NPPF sets out that the planning system should actively manage patterns of growth and significant development should be focused on locations which are or can be made sustainable. Paragraph 116 goes on to advise that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

3.12.2 Policy DM06 informs that development will be permitted subject to:

1.
 - a) ensuring the safe, connected and convenient movement across the transport network, including bus passengers, cyclists, pedestrians and horse riders
 - b) providing safe access, servicing and parking arrangements as defined in this policy and having regard to Highway Authority guidance and standards
 - c) ensuring that additional traffic movements are not detrimental to highway safety or result in the residual cumulative impact on the road network being severe

3.12.3 Policy DM06 goes on to advise that all major development is required to submit a Transport Assessment which considers the impact of the development and identifies suitable mitigation. All major development must also:

2.
 - a) incorporate measures to facilitate and encourage safe access by cycle and on foot along with protection of, connection to and extension, where practicable, of existing pedestrian, cycle and equestrian routes
 - b) provide accessible cycle parking
 - c) deliver public transport enhancements where feasible to mitigate development impacts, including but not limited to bus routes, information and waiting facilities and measures to encourage public transport use
 - d) where appropriate, contribute to provision for the transport needs of specific groups in the community, such as the elderly and those with disabilities
 - e) ensure car parking provision sufficient for the location and type of development, and make provision for Car Club spaces and EV charging points
 - f) mitigation for any adverse impact on residential amenity and air quality, especially in Air Quality Management Areas



- 3.12.4 In terms of the requirements and the wording set out in policy DM06, Bloor Homes do **not support** the policy as currently proposed. Further clarity is requested and it is considered that amendments to the wording are required to ensure the policy is justified and sound.
- 3.12.5 Turning to part 1c of the policy, it is considered that the policy should be reworded to ensure consistency with paragraph 116 of the NPPF. This will ensure that the policy is in accordance with the requirements set out in national policy and adopts a consistent and justified approach.
- 3.12.6 With regards to part 2c of the policy and the need to deliver public transport enhancements, it is considered that the policy fails to have regard to Demand Responsive Transport (DRT) and the increased demand for this service. This is particularly relevant in the Leicestershire area where the 'Fox Connect Service' operates locally. Therefore, it is considered that part 2c should incorporate reference to the DRT to also ensure demand for this need is also taken into account.
- 3.12.7 Looking at part 2d of the policy, it is considered that the wording as proposed is very vague and suggests that contributions will be sought from development proposals coming forward to fund other services, which in turn can lead to wider complications. It is therefore considered that part 2d can be incorporated into part 2c of the policy as community based services.
- 3.12.8 In terms of part 2e of the policy, it is considered that flexibility should be applied to the provision of car clubs. This is on the basis that car clubs are more suitable for larger developments and will not be suitable or applicable to all schemes. Turning to the provision of EV charging points, the requirement for EV charging is an obligation under Building Regulations (Approved Document S) and it is therefore considered unnecessary to include this within the policy. However, if the provision of EV charging points is required to serve as a communal facility, then this should be specified in the policy. If communal EV charging facilities are required, it is worth noting that these are difficult to manage and assign. Therefore, unless a clear strategy is provided which sets out how a communal EV charging point can be secured and maintained, Bloor Homes do **not support** this.
- 3.12.9 Finally, looking at part 2f of the policy, it is considered that the requirement for impact on residual amenity is vague and fails to specify exactly what area this relates to. Therefore, Bloor Homes consider that this part of the policy needs to be more specific and specify whether residential amenity relates to noise etc. Policy DM06 as drafted is considered to be unsound and is not justified, as per the tests set out at paragraph 36 of the NPPF. Therefore, the below amendments are required in order to make the policy sound.
1.
 - a) ensuring the safe, connected and convenient movement across the transport network, including bus passengers, cyclists, pedestrians and horse riders
 - b) providing safe access, servicing and parking arrangements as defined in this policy and having regard to Highway Authority guidance and standards
 - c) ensuring that additional traffic movements ~~are not detrimental~~ do not cause an unacceptable impact to highway safety or result in the residual cumulative impact, following mitigation, on the road network being severe
 2.
 - a) incorporate measures to facilitate and encourage safe access by cycle and on foot along with protection of, connection to and extension, where practicable, of existing pedestrian, cycle and equestrian routes



- b) provide accessible cycle parking
- c) deliver public transport and Demand Responsive Transport (DRT) enhancements where feasible to mitigate development impacts, including but not limited to bus routes, information and waiting facilities, community based services, and measures to encourage public transport use
- ~~d) where appropriate, contribute to provision for the transport needs of specific groups in the community, such as the elderly and those with disabilities~~
- e) ensure car parking provision sufficient for the location and type of development, and make provision for Car Club spaces where suitable and EV charging points
- f) mitigation for any adverse impact on residential amenity and air quality, especially in Air Quality Management Areas

3.13 Policy DM07: Managing Flood Risk

3.13.1 Paragraph 170 of the NPPF informs that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Paragraph 171 goes on to advise that strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources. Paragraph 173 then sets out that all Plans should apply a sequential, risk based approach to the location of development, taking into account all sources of flood risk and the current and future impacts of climate change.

3.13.2 Policy DM07 states “*wherever possible, development should take place within Flood Zone 1. The Sequential Test and, where necessary, the Exceptions Test should be used to assess the suitability of proposed development*”.

3.13.3 In relation to the Site and its location within Flood Zone 1, policy DM07 requires a site specific Flood Risk Assessment to cover the following:

- a) Major development
- b) Land with critical drainage problems
- c) Land at increased flood risk in the future
- d) Where a more vulnerable use is proposed on land which may be subject to sources of flooding other than rivers
- e) Catchments that have experienced sewer flooding

3.13.4 Bloor Homes note the need for a Sequential Test where necessary and have no further comments to raise at this moment in time.

3.14 Policy DM08: Sustainable Drainage

3.14.1 Paragraph 182 of the NPPF requires applications which could affect drainage on or around the site to incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff and which are proportionate to the nature and scale of the proposal.

3.14.2 Policy DM08 sets out that:



1. All development must promote an integrated approach to water management through planting and incorporating rainwater storage for reuse and irrigation.
2. All major developments must incorporate SuDS and take account of the drainage hierarchy as follows (in order of priority):
 - a) store rainwater for later use for irrigation or non-potable purposes
 - b) promote natural infiltration with soakaways or permeable surfaces to recharge groundwater
 - c) use green roofs, rain gardens, or vegetated systems to hold and slowly release water
 - d) use engineered systems like underground tanks or ponds to temporarily store and control water flow
 - e) discharge to nearby rivers or streams where practicable, ensuring that any run-off does not negatively impact on the water quality of a nearby waterbody
 - f) discharge to surface water sewer
 - g) discharge to combined sewer only as a last resort in order to prevent overloading the sewer network
3. The design and layout of the SuDS should prioritise nature based solutions and taking account of the hydrology of the site, must:
 - a) manage surface water close to its source and on the surface where feasible
 - b) be designed to incorporate surface water management features as green and blue infrastructure wherever possible, maximising multifunctional benefits for biodiversity, amenity, cooling and water quality
 - c) use features that enhance the site design and sense of place and where it is incorporated in open space, provide a safe naturalised system without the need for fencing or barriers
 - d) provide for the re-naturalisation of modified water courses where practical
 - e) be located away from land affected by contamination that may pose an additional risk to groundwater or other waterbodies
 - f) demonstrate that the peak rate of run-off over the lifetime of the development, allowing for climate change, is no greater for the developed site than it was for the undeveloped site and reduced wherever possible. Developments are required to achieve a 20% reduction in run-off rates compared to pre-development conditions to account for existing surface water runoff problems
 - g) ensure that flooding would not occur to property in and adjacent to the development, in the event of an occurrence of a 1 in 100-year rainfall event (including an allowance for climate change) or in the event of local drainage system failure

3.14.3 As currently drafted, Bloor Homes do **not support** policy DM08.



- 3.14.4 Firstly, looking at part 1 of the policy, it is considered that the proposed approach is vague and fails to provide further details in relation rainwater storage. It is considered that rainwater storage could relate to either water butts or the provision of rainwater harvesting tanks. If the policy does seek to include the provision of rainwater harvesting tanks, regard will then need to be had to storage calculations and there being the possibility of an over provision of storage requirements. These comments also relate to part 2a of the policy.
- 3.14.5 Part 3f of the policy makes reference to peak run-off rates over the lifetime of a development and the need for developments to achieve a 20% reduction in run-off rates compared to pre-development conditions to account for existing surface water runoff problems. As currently drafted, it is unclear as to what return periods are being referenced to in respect of the 20% reduction in run-off rates. The wording of the policy needs to be more specific in this regard and advise how the 20% rate should be applied and what should be achieved. This is particularly crucial given the potential implications this can have on storage requirements. It is also unclear if the Council are suggesting whether brownfield sites would need to revert to greenfield sites and if a further 20% would then need to be applied, which would be seemingly onerous. Further to this, there are also practical implications associated with the 20% runoff rate, noting that discharge rates cannot be reduced to below 2 l/s due to blockage issues with the flow control devices.
- 3.14.6 Taking the above into account, Bloor Homes do **not support** policy DM08 as currently proposed and request that the policy is reviewed, with elements on rainwater storage and 20% runoff rates being specified further. It is considered that policy DM08 has not been positively prepared, is not justified or based on sound evidence, as per paragraph 36 of the NPPF. We therefore reserve the right to comment on this once further information is made available.

3.15 Policy DM09: Sustainable Construction and Climate Resilience

- 3.15.1 Paragraph 162 of the NPPF sets out that Plans should take a proactive approach to mitigating and adapting to climate change. Policies should support appropriate measures to ensure the future health and resilience of communities and infrastructure to climate change impacts.
- 3.15.2 Policy DM09 informs that all development must:
- a) minimise carbon emissions during construction, which may include use of low-carbon construction materials, and adopting energy efficient construction practices;
 - b) where relevant, demonstrate that demolition of existing buildings is justified in comparison to their retention and re-use, and where buildings are retained, integrate measures to make these more energy and resource efficient in accordance with criteria 3 and 5 below;
 - c) where demolition of existing buildings is required, demonstrate the reuse of demolition and construction waste;
 - d) demonstrate the integration of passive design measures, including delivering cooling without increasing carbon emissions, such as through optimal building orientation, natural ventilation, solar shading and the use of thermal mass to regulate indoor temperatures;
 - e) be supported by a water efficiency statement that outlines, in priority order, measures to reduce water consumption, reuse water, or offset its use and achieve minimum water efficiency equivalent to 110 litres per person per day for any residential use, or non-residential development to achieve at least 3 credits in the Wat01 Measure for water in the BREEAM New Construction standard; and



- f) Demonstrate how waste will be minimised during construction and during the operation of the development. Residential development.

All new-build residential developments must achieve at least a three star rating under the BRE Home Quality Mark scheme. A whole life-cycle assessment should be undertaken as part of this assessment for major development.

- 3.15.3 When reviewing policy DM09 it is considered that the wording includes no flexibility and fails to have regard to viability and individual development proposals. As such, Bloor Homes do **not support** the policy as currently drafted.
- 3.15.4 Further to the above, policy DM09 requires all new-build residential developments to achieve at least a three star rating under the BRE Home Quality Mark scheme. This is **not supported**. The BRE Home Quality Mark scheme is a **voluntary** certification scheme for new developments. To achieve the Home Quality Mark certification, new dwellings must exceed the requirements of established standards set out in Building Regulations. If a site is already meeting the requirements of Building Regulations, then there is no requirement in national policy for a site to go above and beyond this. The approach taken by the Council for all new build residential standards to meet this voluntary certification is onerous and has not been supported by any evidence. It is not considered reasonable to restrict the delivery of residential development when the BRE Home Quality Mark certification is a voluntary certification and exceeds Building Regulations. The requirement for BRE Home Quality Mark certification may not be suitable or practicable in parts of a development. On this basis, it is considered that policy DM09 has not been positively prepared and is not justified.
- 3.15.5 Taking the above into account, it is considered that the below recommendations are necessary to ensure that policy DM09 is sound and justified, as per the requirements of paragraph 36 of the NPPF. Therefore, draft policy DM09 should be amended as follows:

“All development ~~must~~ should aim to:

- a) minimise carbon emissions during construction, which may include use of low-carbon construction materials, and adopting energy efficient construction practices;
- b) where relevant, demonstrate that demolition of existing buildings is justified in comparison to their retention and re-use, and where buildings are retained, integrate measures to make these more energy and resource efficient in accordance with criteria 3 and 5 below;
- c) where demolition of existing buildings is required, demonstrate the reuse of demolition and construction waste;
- d) demonstrate the integration of passive design measures, including delivering cooling without increasing carbon emissions, such as through optimal building orientation, natural ventilation, solar shading and the use of thermal mass to regulate indoor temperatures;
- e) be supported by a water efficiency statement that outlines, in priority order, measures to reduce water consumption, reuse water, or offset its use and achieve minimum water efficiency equivalent to 110 litres per person per day for any residential use, or non-residential development to achieve at least 3



credits in the Wat01 Measure for water in the BREEAM New Construction standard; and

- f) Demonstrate how waste will be minimised during construction and during the operation of the development. Residential development.

~~All new-build residential developments must achieve at least a three star rating under the BRE Home Quality Mark scheme. A whole life-cycle assessment should be undertaken as part of this assessment for major development."~~

3.15.6 Bloor Homes therefore do **not support** the policy as currently drafted.

3.16 Policy DM10: Biodiversity and Geodiversity Protection and Enhancement

3.16.1 Paragraph 187 of the NPPF advises that planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity.

3.16.2 Policy DM10 informs that all qualifying development proposals must deliver at least a 10% measurable biodiversity net gain attribute to the development. The net gain for biodiversity should be calculated using Natural England's Biodiversity Metric. Biodiversity Net Gain should be provided onsite wherever possible. All development must contribute towards protecting and improving biodiversity and geodiversity by:

- a) protecting and enhancing priority species and their habitats
- b) including measures to mitigate the impacts of climate change on the district's flora and fauna
- c) protecting and enhancing green and blue infrastructure assets
- d) protecting riparian zones and watercourses by creating and enhancing undeveloped buffer zones alongside watercourses to ensure functional habitat corridors for wildlife
- e) protecting features and areas of geodiversity value and enhancing them to improve connectivity of habitats, amenity use, education and interpretation
- f) include appropriate measures to manage construction impacts by demonstrating how existing wildlife habitats supporting protected or priority species will be retained, safeguarded and managed during construction

3.16.3 Whilst Bloor Homes **support** the principle of the policy and securing a mandatory requirement of 10% BNG, it is considered that the policy as currently worded does not provide any flexibility and sets an absolute requirement. For example, part c) of the policy requires developments to protect and enhance green and blue infrastructure assets. It is unlikely that the majority of developments will be able to fully comply with this requirement. Many development sites require the removal of some trees or hedgerows to facilitate development due to constraints such as access or levels. As such, it is requested that flexibility is built into the policy to allow developments to be delivered even when they cannot meet all of the requirements set out in draft policy DM10.



3.16.4 On account of the above, the following recommendations are made to amend the wording of draft policy DM10 to ensure that it is sound and justified, as per the tests set out at paragraph 36 of the NPPF:

All qualifying development proposals must deliver ~~at least~~ a 10% measurable biodiversity net gain attributable to the development. The net gain for biodiversity should be calculated using Natural England's Biodiversity Metric.

All development ~~must~~ ~~should~~ ~~aim to~~ contribute towards protecting and improving biodiversity and geodiversity by:

- a) protecting and enhancing priority species and their habitats
- b) including measures to mitigate the impacts of climate change on the district's flora and fauna
- c) protecting and enhancing green and blue infrastructure assets
- d) protecting riparian zones and watercourses by creating and enhancing undeveloped buffer zones alongside watercourses to ensure functional habitat corridors for wildlife
- e) protecting features and areas of geodiversity value and enhancing them to improve connectivity of habitats, amenity use, education and interpretation
- f) include appropriate measures to manage construction impacts by demonstrating how existing wildlife habitats supporting protected or priority species will be retained, safeguarded and managed during construction.

3.17 Policy DM12: Protection and Enhancement of Community Facilities

3.17.1 Paragraph 98 of the NPPF sets out that in order to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should plan positively for the provision and use of shared spaces, community facilities and other local services to enhance the sustainability of communities and residential environments.

3.17.2 Policy DM12 informs that development proposals that protect, retain or enhance the provision, quality or accessibility of existing community, education and cultural facilities will be supported.

3.17.3 As drafted, Bloor Homes **broadly support** the wording of the policy and the support to proposals that enhance the quality of existing community and education facilities. On this basis, Bloor Homes wish to emphasise the development proposals at Land north of Wistow Road, Kibworth and its capacity to provide recreational space or community facilities, particularly in contrast with all other sites in and around Kibworth.

3.17.4 Bloor Homes therefore have no further comments to make on this policy at this moment in time but reserve the right to comment further as the Draft Local Plan progresses.



4 Sustainability Appraisal

4.1 Sustainability Appraisal

4.1.1 As part of the supporting evidence base for the Draft Local Plan, a Sustainability Appraisal (February 2025) has been prepared by LUC on behalf of Harborough District Council.

4.1.2 The Sustainability Appraisal lists a series of objectives which include:

- 1) Minimise greenhouse gas emissions and develop a managed response to the effects of climate change
- 2) Protect, enhance and manage biodiversity and geodiversity
- 3) To support efficient use of resources, including soil
- 4) To conserve and enhance the historic environment including the setting of heritage features
- 5) Protect and improve air quality
- 6) Safeguard and improve health, safety and wellbeing
- 7) Achieve social inclusion and equality for all
- 8) To provide access to services, facilities and education
- 9) Provide affordable, sustainable, good-quality housing for all
- 10) Support the sustainable growth of the economy and provide employment opportunities
- 11) Reduce waste generation and increase levels of reuse and recycling
- 12) To manage and reduce flood risk from all sources and to protect the quality and quantity of water resources
- 13) Promote sustainable transport use and active travel
- 14) To conserve and enhance the character and distinctiveness of the landscape

4.1.3 The following scoring system is then used to score sites:



Symbol and Colour Coding	Description
++	Significant positive effect likely.
++/-	Mixed significant positive and minor negative effects likely.
+	Minor positive effect likely.
+/-	Mixed minor effects likely.
++/--	Mixed significant effects likely.
-	Minor negative effect likely.
--/+	Mixed significant negative and minor positive effects likely.
--	Significant negative effect likely.
0	Negligible effect likely.
?	Likely effect uncertain.

4.1.4 The Site (ID - 24/12186) scores the following in relation to the above objectives:

1. Negligible effect likely
2. Negligible effect likely / likely effect uncertain
3. Significant negative effect / negligible effect likely / likely effect uncertain
4. Significant negative effect likely / likely effect uncertain
5. Negligible effect likely
6. Minor positive effect
7. Negligible effect likely
8. Minor positive effect likely / negligible effect likely / likely effect uncertain
9. Minor positive effect likely
10. Minor positive effect likely
11. Negligible effect likely
12. Minor negative effect likely / negligible effect likely
13. Minor positive effect likely
14. Significant negative effect likely / likely effect uncertain

4.1.5 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). For these documents it is also necessary to conduct an environmental assessment in accordance with the requirements of the Strategic Environmental Assessment (SEA) Directive (European Directive 2001/42/EC), as transposed into law in England by the SEA Regulations and which remains in force despite the UK exiting the European Union in January 2020.

4.1.6 Turning to the assessment of the Site, it is positive to see that the Site mostly consists of positive, negligible or uncertain likely effects.



- 4.1.7 However, turning to the significant negative effects associated with SA Objective 3 (soil), given the rural nature of Harborough District, the majority of site options are expected to have significant negative effects on this SA objective as they consist of greenfield and agricultural land. It is therefore essential that sites are reviewed on an individual basis rather than in comparison with other sites to assess the level of effect. Further to this, it is also not possible to avoid building on agricultural land if the required levels of housing are to be met, as discussed throughout these representations. Bloor Homes therefore do **not support** the Site's awarding in this regard and consider that the score should be changed to minor negative effect likely.
- 4.1.8 In terms of SA Objective 4 (Heritage) it is noted that there are heritage assets within 1km of the Site which is the distance threshold that the Council has used to determine the effect of the development. However, this does not take into account the existing built environment within which the heritage assets sit. The Site would be separated from the nearest heritage assets by the A6 and the existing residential development to the south-east of the Site. At this stage this is considered sufficient enough to lessen the impact of any development of the Site on the setting of the asset. As such, Bloor Homes do not support the awarding in this case and consider that the score should be changed to 'minor negative effect / likely effect unclear'.
- 4.1.9 With regards to SA Objective 12, the entirety of the Site is located within Flood Zone 1 (as per the EA's updated flood maps for planning). In terms of surface water flooding, there are nominal areas of this present onsite, with this mostly been concentrated across the northern end of the Site. No technical concerns have been raised within the assessment of the Site and the incorporation of appropriate mitigation measures (retention of ditches, avoiding development around high risk areas and use of SuDS systems on site) would sufficiently address any surface water flood risk. In this regard, it is considered that the scoring of minor negative effect likely should be amended to negligible effect.
- 4.1.10 In terms of the landscape, the existing landscape and hedgerows will be retained onsite wherever possible to inform new public open space and green corridors. Strong buffer boundaries are proposed onsite and additional landscaping will be introduced. Given the scale of the Site, there is capacity to provide generous open space and suitable buffering to the edges abutting open countryside. Therefore, Bloor Homes consider that the score for the Site should be changed from significant negligible effect likely to minor negative effect likely.
- 4.1.11 In account of the above scores afforded to the Site in relation to soil, flood risk and landscape, Bloor Homes do **not support** the findings of the Sustainability Appraisal and recommend that the following amendments are made in order for the Sustainability Appraisal to be considered sound and justified, as per paragraph 36 of the NPPF:
- The Site should score minor negative effect in relation to SA Objective 3 on the basis that the wider Leicestershire area is rural in nature and therefore to ensure that the District Council meet their development requirements, it will be necessary to develop agricultural land.
 - The Site should score minor negative effect in relation to SA Objective 4 on the basis that the Site is separated from the nearest heritage assets by substantial existing built form and the Site has the capacity to address visual impact concerns.
 - The Site should score negligible effect in relation to SA Objective 12 given the Site is located in Flood Zone 1 and an appropriate drainage strategy can be incorporated to mitigate any surface water flooding onsite.



Harborough Proposed Draft Local Plan 2020 – 2041 (Regulation 19 Consultation)

- The Site should score minor negative effect likely in relation to SA Objective 14 on the basis that the Site can accommodate strong landscaping buffers along the Site boundaries in addition to large portions of open space and green corridors onsite.



5 Policies Map

5.1 Policies Map

- 5.1.1 The Harborough Local Plan Regulation 19 consultation is accompanied by an updated Policies Map which illustrates site allocations and designations within the District.
- 5.1.2 The Site is not allocated or subject to any formal designations. As outlined within this report, Bloor Homes consider it necessary for the Council to allocate additional sites within the District for housing, with the Site representing an unconstrained and deliverable option in a sustainable location. Should the Site be reviewed, Bloor Homes reserve the right to comment further as the Draft Local Plan progresses.



6 Summary and Conclusions

6.1 Conclusions

- 6.1.1 These representations to the Harborough District Local Plan Regulation 19 consultation have been prepared by Stantec on behalf of Bloor Homes.
- 6.1.2 Bloor Homes are working with the landowners to promote the Site at Land North of Wistow Road, Kibworth and with the aim of bringing it forward for development.
- 6.1.3 Bloor Homes support Harborough District Council in undertaking the review of the Local Plan. As detailed above, Bloor Homes consider that a higher housing figure should be provided within the Local Plan to address Harborough's needs, Leicester and Leicestershire's unmet needs, and the affordability needs within the District. Bloor Homes also wish to raise on this basis that additional sites will be required for allocation in order to meet these needs. It is considered that Land north of Wistow Road has the capacity to deliver up to 150 homes via a comprehensive masterplan and one that is of good design. The provision of an additional development site will help meet apparent needs within Harborough District, as raised within these representations.
- 6.1.4 Bloor Homes have been engaging with Leicestershire County Council and Harborough District Council to discuss the Site and development proposals. A pre-application request has been submitted to Harborough District Council to further discuss the Site proposals. The Council's own assessment of the Site (through the SHELAA 2024) concluded that there were no technical constraints preventing development of the Site.
- 6.1.5 Within these representations, Bloor Homes have recommended amendments to several policies to ensure that a justified and sound Local Plan for Harborough District Council is progressed. We trust that these comments and recommendations will assist Harborough District Council in developing their Plan positively. We reserve our right to comment further on these additional documents and changes once published. We would be pleased to discuss these comments and recommendations with Harborough District Council in further detail, potentially as part of pre-application discussions.



Appendix A Site Location Plan





The scaling of this drawing cannot be assured

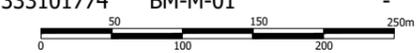
Revision	Date	Drn	Ckd

— Site Boundary

Project
**Wistow Road,
 Kibworth**
 Drawing Title
Site Boundary Plan



Date	Scale	Drawn by	Check by
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Project No	Drawing No	Revision	
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