



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

Land at Beeby Road, Scraftoft

April 2025

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

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1 Introduction

1.1 Introduction

- 1.1.1 Stantec is instructed by Bloor Homes to prepare and submit representations to the draft Harborough 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 in the document, where relevant.
- 1.1.3 Bloor Homes are working collaboratively with the landowners to bring forward a residential led development at Land at Beeby Road, Scraftoft (the 'Site'). The Site is proposed as a draft allocation in the draft Local Plan as Site Allocation S2 (Land at Beeby Road, Scraftoft).
- 1.1.4 Bloor Homes **support** the allocation of the Site in the draft Local Plan and welcome the Council's recognition of its suitability for development.
- 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 The following supporting documents are appended to these representations:
- **Appendix A** – Site Location Plan
 - **Appendix B** – Concept Plan for Land at Beeby Road
 - **Appendix C** – Pre-Application Response Letter from HBC
 - **Appendix D** – Land Use Plan
 - **Appendix E** – Block Masterplan
 - **Appendix F** – Concept Plan including the wider area within the Applicants control
 - **Appendix G** – Transport Technical Note
- 1.1.7 Whilst the Site is proposed as a draft allocation for 175 dwellings, it is worth noting that Land at Beeby Road has the capacity to deliver up to 200 dwellings. Bloor also control additional land adjacent to the draft allocation that I, has potential for up to 800 additional dwellings) and potential for a site for a primary school. The proposed draft allocation of the Site forms a logical extension to the settlement of Scraftoft and will see the delivery of an attractive, high quality and locally distinctive place to live.
- 1.1.8 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 at Beeby Road, Scraptoft

2.1 The Site Context

- 2.1.1 The Site is located on the north-eastern edge of Scraptoft, which is adjacent to the urban conurbation of Leicester. The Site comprises agricultural land with an area of approximately 10.66 hectares. Some 380 metres to the north-east of the Site is proposed to be an off-site BNG area of approximately 2.32 hectares; outlined in blue (**Document 1**).
- 2.1.2 To the south is a recently completed housing scheme by Bellway, which was pursuant to an outline planning permission for 178 dwellings on 11th February 2016 (14/01637/OUT) and subsequent reserved matters approval on 4th January 2017 (16/01372/REM).
- 2.1.3 On the opposite side of the road to the Site, separated by Beeby Road is Scraptoft Golf Club and Scraptoft Nature Reserve. Scraptoft Golf Club and Scraptoft Nature Reserve are allocated within the current adopted Harborough Local Plan for a residential-led development comprising approximately 1,200 dwellings, a two-form entry primary school and a neighbourhood centre (Policy SC1 – Scraptoft North Strategic Development Area). An outline planning application (19/00700/OUT) for the erection of up to 1,200 dwellings, access road, local centre with retail, healthcare, community uses, care accommodation, a two-form entry primary school, nursery, green infrastructure, sport and recreational facilities was submitted in October 2019, and is currently undetermined. We understand for viability reasons this planning application has not progressed. This Development Plan allocation is not carried forward into the emerging Local Plan.
- 2.1.4 Within close proximity to the Site are a number of amenities; including Scraptoft Golf Club (~650m), Scraptoft Brook Play Area (~650m), Scraptoft Community Hub (~900m), Beeby Road bus stop (~1.0km), Peartree Stores (~1.35km), Central Co-op (~1.35km), The White House PH (~1.65km), Scraptoft Valley Primary School (~1.9km), Orchard Mead Academy (~2.0km) and Nether Hall School (~2.0km).
- 2.1.5 Access to the Site would be from Beeby Road (there is an existing gated farm access at the current time), and Keyham Lane East for the off-site BNG area. The nearest bus stops are located on Beeby Road, Church Hill and Malsbury Avenue which serve bus route 56/56A connecting Leicester City Centre to Thurnby and Scraptoft. Leicester City Centre including its train station is located approximately 7km west of the Site.
- 2.1.6 One public right of way (PRoW) crosses the off-site BNG area (D27 footpath). This connects Keyham Lane East, Scraptoft to Snows Lane, Keyham.
- 2.1.7 The Site is located in Flood Zone 1. A portion of the off-site BNG area is in Flood Zone 2 and 3, but no built development is planned as part of the proposed indicative Concept Masterplan here.
- 2.1.8 The Site has pockets of low to high surface water flooding, as shown on the overlays in **Document 5**, including risk of flooding from surface water flooding with climate change between 2040 and 2060. Large areas of the off-site BNG area are at risk of low to high surface water flooding, but no built development is planned as part of the proposed indicative Concept Masterplan here.
- 2.1.9 There is no designated heritage assets located within the Site. The Site is not within a Conservation Area, with Keyham Conservation Area located approximately 1.0 km to the east and Scraptoft Conservation Area approximately 530 metres to the south-west. The nearest listed building is 'Grotto at Scraptoft', which is Grade II listed and is approximately 300 metres to the south of the Site.
- 2.1.10 The Site is free from any formal ecological designations. Scraptoft Local Nature Reserve is on the opposite side of Beeby Road. The Inspector's Report of 8th April 2019 into the Examination



of the Harborough Local Plan 2011 to 2031 stated at paragraph 96 that it has not been managed as a nature reserve, and the allocation of Scraptoft North SDA would result in its de-designation. The Planning Statement Addendum (December 2023) for the SDA planning application at paragraph 2.6 highlights that ‘through discussions with the County Ecologist and Planning Officers, it has been confirmed that the LNR will be de-designated at the point of planning permission being approved’.

- 2.1.11 The Site is not located within the Leicester/Scraptoft/Bushby Green Wedge. The Site is not in the Green Belt.
- 2.1.12 For context, the wider (second phase) site is split into two parcels as shown in **Appendix F**. The first parcel is approximately 56.75 hectares where the built-form development is proposed (including for up to 900 dwellings and a one-form entry primary school), and the second parcel of approximately 12.22 hectares would be for BNG (likely to be included in the blue line as off-site BNG).
- 2.1.13 Scraptoft lies within Thurnby and Houghton Ward. The three Liberal Democrats Councillors that represent this Ward are Amanda Burrell, Peter Elliott, and Simon Galton. Cllr Burrell is currently Chair of Planning Committee and Cllr Elliott is on the Planning Committee. Cllr Galton is the Portfolio Holder for Planning.

2.2 The Development Proposals

- 2.2.1 The development proposal at Land at Beeby Road, Scraptoft will be subject to a planning application for ‘Outline planning application with means of access with all other matters reserved for up to 200 dwellings, open space, landscape, drainage and associated infrastructure and works’.
- 2.2.2 The Site seeks to deliver the following benefits:
- Up to 200 dwellings, including 40% affordable housing (approximately 80 dwellings) at a density of approximately 35 dwellings per hectare (comprising approximately 5.72 hectares);
 - Approximately 4.58 hectares of open space for public amenity, recreation, attenuation, landscaping, and on-site biodiversity (45% of the Site).
 - Vehicle, pedestrian and cycle access from Beeby Road (including internal pedestrian and cycle routes); and
 - The provision of off-site and on site BNG to ensure the mandatory requirement and the Council’s draft Policy for at least 10% BNG is met. The blue line site area is approximately 2.32 hectares and can accommodate the balance of 10% BNG provision that cannot be provided in the red line site boundary.
- 2.2.3 Access to the Site is proposed via a priority T-junction arrangement off Beeby Road, as shown in **Appendix G**. As Scraptoft North SDA is located on the opposite side of Beeby Road, an alternative access strategy was designed to show that the proposed development could come forward without prejudicing this development. The alternative access arrangement takes the form of a priority T-junction location further north along Beeby Road and is included in **Appendix G**.
- 2.2.4 As demonstrated by the Site’s draft allocation in the Regulation 18 consultation, it is considered that the Site has no known constraints within the development area which cannot be mitigated. This is supported by the technical evidence base documents that have already been submitted to HDC to inform their assessment of the Site and its consideration as a draft allocation in the draft Local Plan.



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.
- 3.1.3 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 proposed 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.
- 3.1.4 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.
- 3.1.5 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. To ensure that new development serves to complement the established townscape, proposals should be focused in the most sustainable locations, adjacent to existing development, such as S2. This is **supported** by Bloor Homes.
- 3.1.6 The vision also recognises the need for residents in new communities to benefit from improved access to local services and community provision, including healthcare, education and recreational facilities. To enable these provisions to come forward, it is considered that the delivery of large developments, such as S2, will ensure that these provisions are delivered in the right location, and new communities are suitably supported. The development proposals will provide up to 200 dwellings, including open space for public amenity, recreation, attenuation and landscaping. Scraftoft falls within the provisional settlement hierarchy classification as a settlement adjoining the Leicester Urban Area which has a range of local services and facilities. As such, this is **supported** by Bloor Homes.
- 3.1.7 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, as demonstrated by their commitment to engage with Scraftoft Parish Council and Keyham Parish Council on the proposals.



3.1.8 It is worth noting that Bloor Homes have held a consultation and engagement briefing with Scraftoft Parish Council and Keyham Parish Council to discuss the development proposals and seek feedback on local community needs.

3.1.9 On whole, Bloor Homes **support** the vision for the draft Local Plan and its timely adoption.

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 S2 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 2023 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. S2 is proposed as a draft allocation for 175 dwellings and is able to help the Council meet their development needs in a sustainable location in Scraftoft. 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). As previously stated, S2 has the capacity to deliver up to 200 dwellings, should the Council seek to allocate further dwellings that look towards long-term future needs. In addition, Bloor Homes control a wider parcel of land which has potential to accommodate up to 800 dwellings including a site for a Primary School as set out in Appendix F.
- **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, wish to emphasise the ability to sustainably contribute towards economic growth within Scraftoft 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 appropriate 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 S2, the Council will be able to ensure that this objective is achieved during the Local Plan period. S2 proposes a multitude of benefits for both new and existing residents including development of up to 200 homes, public open space and children's play areas within Parcel 1 and 10% Biodiversity Net Gain
 - In relation to the wider land parcel within Bloor Homes' control adjacent land to the draft allocation which could accommodate up to 800 dwellings, and it is therefore considered that the site and the potential land development proposals would significantly contribute towards meeting this development 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 the development proposals at Land at Beeby Road (S2) contributes 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 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.



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- 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 our representations to the Regulation 18 consultation, the point was made on behalf of Bloor Homes 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 |



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- 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 Scraftoft. This has then been used to help determine that S2 is the most appropriate for allocation in Scraftoft and has had regard to the character of the settlement, the scale of S2, technical considerations and proximity to services. These details are set out within the Site Selection Methodology (February 2025). It is therefore worth noting that the Council consider that S2 forms the most suitable and sustainable location for development within Scraftoft, as evidenced by the Site Selection Methodology. Given S2 is considered to have limited technical constraints, is located on the settlement edge and is within close proximity to services, it is considered that the capacity of S2 should be increased from 175 dwellings to 200 dwellings. This will ensure that the needs of Scraftoft and the wider area are met in both the short and long term and are accommodated on a single sustainable site.
- 3.4.12 Bloor Homes therefore do **not support** policy DS01 and consider that the policy as drafted is not currently **positively prepared** or **effective** but **support** the allocation of S2 for development.
- 3.4.13 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 capacity of Site S2 from 175 dwellings to 200 dwellings, given the Site is evidenced to be the most suitable and sustainable location for development in Scraftoft. This would also contribute an additional 25 dwellings towards 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 S2 forms the only draft allocation for Scraftoft and is proposed as follows:
1. The Site would form an extension to the gateway into Scraftoft village this should be recognised within the design and layout of development proposals
 2. Development of the site should contribute to the reasonable costs of the provision of a new 2 from entry primary school located at site S1, as necessary.



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3. Assessments of traffic impacts should consider the interaction between the Thorpebury SDA in Charnwood between Thurmaston and Syston (and neighbouring Scraptoft developments that may provide connections to the A563 and A607/A46). The impacts will be informed by a Transport Assessment that sets out on-site and off-site transport measures to mitigate impacts from the development.
 4. A minerals Assessment must accompany the proposal, in accordance with Policy M11 of the Leicestershire Minerals and Waste Local Plan.
 5. A site-specific Flood Risk Assessment will be required to assess the risk of surface water flooding and access/egress arrangements. A carefully considered and integrated flood resilient and sustainable drainage design will also be required, including a site-specific Surface Water Drainage Strategy, and SuDS maintenance and management plan. The sequential approach to site layout should be taken to avoid the area of surface water flood risk in the northeast of the site
 6. A contaminated land report will be required to address the risk and identify any appropriate mitigation arising from the historical agricultural development in the south-west corner of the site.
 7. The layout of the development must consider the potential noise and lighting impacts from the proposed crematorium which adjoins the site. Noise impact assessment may be required. This may include a requirement for a building overheating and ventilation assessment.
 8. The site is close to safeguarded waste site Houghton on the Hill Sewage Treatment Works. Any planning application would need to demonstrate that there would be no impact on or to the amenity of development and that the proposed development would not prejudice waste operations.
- 3.5.3 As previously stated, Bloor Homes **support** the S2's draft allocation in the draft Local Plan and wish to reiterate their commitment to working with the Council to bring forward S2 for development.
- 3.5.4 In terms of the proposed housing figure of 175 dwellings for S2, as currently drafted, Harborough District Council make no provision for any flexibility within the draft allocation regarding the scope of dwellings proposed. To ensure that suitable flexibility is provided within the draft allocation for Site S2, the Council should include wording along the lines of 'around', 'up to', or 'approximately' to provide some flexibility within the policy wording.
- 3.5.5 In addition to the above and as previously raised within these representations, S2 has the potential to deliver up to 200 dwellings. It is considered that S2 has the capacity to deliver up to 200 dwellings via a comprehensive masterplan and one that is of good design. The provision of 200 dwellings has been explored by Bloor Homes through the provision of technical works and supporting evidence. From the technical studies carried out, it is considered that the increased capacity of 25 dwellings would not have a severe impact on the local highway network and would not have a significant impact on local infrastructure. This is particularly applicable given the infrastructure provisions onsite and the contributions S2 proposes as part of the wider development. Further to this and as raised in the above section, it is considered that Harborough District will need to make further provision for housing within the draft Local Plan to meet evidenced needs. As such, the provision of a further 75 dwellings onsite would provide a sustainable contribution towards this in the Adjoining Leicester Urban Area of Scraptoft .
- 3.5.6 In terms of the supporting evidence prepared in relation to the development proposals, the pre-application discussions that have taken place with Harborough District Council. Formal advice has been provided and advises that there are no significant constraints associated with S2 that cannot be overcome by suitable design and mitigation measures. In addition, it is understood that the Strategic Housing and Economic Land Availability Assessment Update (2024) has provided the basis for the proposed allocation of 175 dwellings at S2 and has had regard to constraints.



3.5.7 Bloor Homes consider that the policy as drafted is not justified as it does not reflect evidenced based needs. Whilst Bloor Homes **broadly support in principle** the draft allocation of S2 in the draft Local Plan, they do not consider it is **justified** or based on **sound** evidence. Bloor Homes therefore wish to see the allocation increased to 200 dwellings and wish to comment further on draft allocation S2 through the draft Local Plan process.

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 The draft allocation of 175 dwellings onsite provides a density of 30dph / 35dph. Whilst the allocation of 175 dwellings may exceed the requirement of 30dph, it is acknowledged that the Council obviously consider that 175 can suitably accommodate an increased density than that set out in the policy.
- 3.7.4 Further to the above, should the proposals seek to provide 200 dwellings onsite, a density of approximately 35dph would be accommodated onsite. Whilst this exceeds that set out in policy HN03, in accordance with the NPPF and optimising the developments of sites, it is considered that the density of 35dph should be considered as a minimum figure. Having 35dph as a minimum figure builds flexibility into the policy and will allow the Council to set out a range of densities that reflect the accessibility and potential of different areas, in accordance with the NPPF. 35dph was also confirmed to be suitable by Planning Officer, Mark Patterson during pre-application discussions on the site.
- 3.7.5 In light of the above, Bloor Homes wish to emphasise that the densities included within the policy should be viewed as a minimum. Bloor Homes therefore **do not support** policy HN03 as currently drafted on the basis that it fails to accord with the tests set out at paragraph 36d of the NPPF and the need to use land efficiently. Bloor Homes consider that the proposed minimum density for policy HN03 should be increased to 35dph.

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 Scraftoft as an adjoining Leicester Urban Area Settlement. Bloor Homes are pleased to see the Council's recognition of Broughton Astley 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 Scraftoft 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



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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 been 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 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 |

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.



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- 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 It is acknowledged that a Strategic Transport Impact Assessment (January 2025) has been prepared in support of policy DM06 and the draft Local Plan. The Strategic Transport Assessment has considered the site allocations at a strategic level, though site and cluster level identification of the impacts within Harborough. Potential allocations have then been considered through the development of TA proformas, including a review of access constraints. S2 (Land East of Beeby Road) is identified as ID: 8090 and is recognised as a sustainable location. The proforma considers that further work is required in respect of a Transport Assessment which explores the key primary and secondary impact location junctions.
- 3.12.6 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.
- 3.12.7 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.
- 3.12.8 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.
- 3.12.9 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.
- 3.12.10 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 S2 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;



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- 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**:

- g) minimise carbon emissions during construction, which may include use of low-carbon construction materials, and adopting energy efficient construction practices;
- h) 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;
- i) where demolition of existing buildings is required, demonstrate the reuse of demolition and construction waste;
- j) 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;
- k) 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



- l) 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:



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- 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.



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. |



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- 4.1.4 S2 Land at Beeby Road (24/12235) scores the following in relation to the above objectives:
1. Negligible effect likely
 2. Minor negative effective likely / likely effect uncertain
 3. Likely effect uncertain
 4. Likely effect uncertain
 5. Negligible effect likely
 6. Positive effect likely
 7. Negligible effect likely
 8. Minor negative effect likely / likely effect uncertain
 9. Minor positive effect likely
 10. Minor positive effect likely/ Likely effect uncertain
 11. Negligible effect likely
 12. Significant negative effect likely / negligible effect likely
 13. Minor negative effect likely
 14. Minor 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 S2, it is positive to see that the Site mostly consists of significant positive, positive, negligible or uncertain likely effects. This demonstrates the suitability of S2 for development, hence its consideration as a draft allocation in the draft Local Plan.
- 4.1.7 However, turning to the significant negative effects associated with SA Objective 3 (resources), 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 Grade 3 agricultural land if the required levels of housing are to be met, as discussed throughout these representations. Bloor Homes therefore do **not support** S2's awarding in this regard and consider that the score should be changed to minor negative effect likely.
- 4.1.8 With regards to SA Objective 12, the entirety of S2 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 in the eastern part of S2. This has been considered in the design of S2 and retainment of ditches in the development proposals. Surface water will be accommodated within the SuDS systems onsite and will also help improve existing surface water issues along Keyham Lane East and Beeby Road, as well as biodiversity improvements. In this regard, it is considered that the scoring of significant negative effect likely should be amended to negligible effect.



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- 4.1.9 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. Proposed Hedgerow and planting will provide suitable buffering to the northern and eastern boundaries. Therefore, Bloor Homes consider that the score for S2 should be changed from minor negative effect likely to negligible effect likely.
- 4.1.10 In account of the above scores afforded to S2 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:
- S2 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
 - S2 should score negligible effect in relation to SA Objective 12 given S2 is located in Flood Zone 1 and proposes a suitable drainage strategy to mitigate any surface water flooding onsite. It is further noted that pre-application discussions have not raised any significant concerns in relation to S2 proposals and flood risk
 - S2 should score negligible effect likely in relation to SA Objective 14 on the basis that the proposals will retain strong landscaping buffers along the Site boundaries and also propose 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 S2 is shown as housing allocation S2 (Land at Beeby Road, Scraptoft) for 175 dwellings. This allocation provides a logical residential extension to the existing settlement of Scraptoft and encourages active travel in the form of bus service upgrades and improved frequency along Beeby Road.
- 5.1.3 Bloor Homes **support** the illustration of on the Policies Map for a residential allocation. However, Bloor Homes wish to note that there is land under Bloor Homes' control adjacent the draft allocation that can accommodate an additional 800 dwellings.



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 bring the draft allocation at Land at Beeby Road (Site Ref. S2) forward for residential development.
- 6.1.3 Bloor Homes support Harborough District Council in undertaking the review of the Local Plan and welcome the inclusion of S2 as a draft allocation. 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 whilst S2 is proposed as a draft allocation for 175 dwellings, it is worth noting that Land at Beeby Road has the capacity to deliver up to 200 dwellings. The provision of an additional 25 dwellings onsite will help meet the needs within Harborough District, as raised within these representations.
- 6.1.4 Bloor Homes have been engaging with Leicestershire County Council, Harborough District Council, Scraftoft Parish Council and Keyham Parish Council to discuss the Site and development proposals. A pre-application meeting has been held with Harborough District Council to further discuss the Site proposals. Further to this pre-application submission, a Transport Technical Note and Flood Risk Technical Note were provided to the Council which advised that there are no overriding technical concerns to prevent the development of the land at S2.
- 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.
- 6.1.6 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.



Appendix A Site Location Plan



Appendix B Concept Plan for Land at Beeby Road



Appendix C Pre-Application Response Letter from HBC



Appendix D Land Use Plan



Appendix E Block Masterplan



**Appendix F Concept Plan including the wider
area within the Applicants control**



Appendix G Transport Technical Note

