

Matter 3: Amount and Distribution of Development

Introduction

- 1.1.1. This representation should be read in conjunction with the previous Regulation 18 and 19 representations made by William Davis Homes (WDH, ref. 7585, agent ref. 7779).
- 1.1.2. WDH is an established and highly respected housing developer based in Leicestershire and have been building new homes across the Midlands for over 90 years. Their work is underpinned by strong family values and understanding. WDH have been rated as a five-star housebuilder in the Home Builders Federation annual survey for the last 11 years; 90% of customers are happy with their home and their experience with the housebuilder.
- 1.1.3. WDH have been promoting Leicester Road, Lutterworth since 2021, submitting the site for a residential allocation as part of the 'Call for Sites' process for the draft Plan. The SHELAA assessment (ref. HSG-NLP 4) positively explained that the site is considered suitable for residential development and is available with the delivery of dwellings achievable within five years.
- 1.1.4. Following this, WDH support the site's identification by Harborough District Council as a proposed allocation (draft ref. L1) to deliver 230 dwellings within Lutterworth over the next plan period (2020-2041). WDH have continued to engage since the site's identification as a draft allocation by making representations to the Regulation 18 and 19 consultations in 2024 and 2025, respectively, and engaging with HDC through the pre-application process to support this proposed allocation and discuss how development on the site can be effectively brought forward.
- 1.1.5. An application (ref. 26/00447/FUL) was submitted in March 2026 to secure full planning permission for the residential development of the site, with access from Leicester Road (A426), alongside landscaping, drainage, open space and associated works. This indicates WDH's intention for the site to deliver housing early in the plan period, as the site is available now.
- 1.1.6. Alongside contributing towards meeting the housing needs of the District at a sustainable location which is supported by existing infrastructure and improvements associated with the Lutterworth East Strategic Development Area (SDA), development on the site will deliver several benefits including the delivery of affordable and specialist housing, provision of a high-quality, safe and well-connected residential environment, biodiversity improvements on and off-site, and incorporation of sustainability measures into the design of proposed dwellings and their associated plots.
- 1.1.7. WDH have provided hearing statements to support the allocation of Leicester Road, Lutterworth (draft ref. L1) in recognition of the contribution of the site towards the identified housing needs of Harborough District and specifically Lutterworth, and provide comments on some draft policies and criteria to ensure the Plan is effective in delivering the District's identified development needs, as required for the Plan to be sound per paragraph 35 of the National Planning Policy Framework (NPPF, 2023).

Issue 1: Spatial Strategy

Question 1: Does the Plan clearly articulate its spatial strategy?

- 1.1.8. WDH support the spatial strategy identified in the draft Plan and believe it is clear in articulating appropriate locations, including specific site allocations, for where development over the Plan period should be delivered to meet the identified needs of the District.
- 1.1.9. Figure 2 and Policy DS01 of the draft Plan provide a clear framework for directing development to the most sustainable settlements and establishing the scale of growth anticipated within different parts of the District to ensure this is suitably distributed. This provides a logical basis for future development and is supported by the wider evidence base, including the Sustainability Appraisal (ref. S-NLP 3).

- 1.1.10. In clearly articulating the spatial strategy, the Plan will be effective in delivering the identified development needs of the District, as required to be sound per NPPF paragraph 35.

Question 2: Is the spatial strategy as set out in Strategic policies DS01 to DS05, and elsewhere in the Plan, an appropriate strategy, taking account of reasonable alternatives, and based on proportionate evidence?

- 1.1.11. WDH supports the overall spatial strategy contained within Policies DS01 to DS05. The strategy appropriately identifies the District's Market Towns (Market Harborough and Lutterworth) as primary locations for growth alongside allocations within the Leicester Urban Area, recognising their role as centres of employment, services and infrastructure. Lutterworth is particularly well placed to accommodate growth given its existing function and strategic importance within the District, supporting the existing and proposed expansion of Magna Park as a major employment site, and continuing to support the priorities of the adopted Plan where the Lutterworth East SDA is a key location for achieving the housing and employment land needs of the current plan period.
- 1.1.12. The draft Plan's evidence base supports the spatial strategy and proposed role of Market Towns, with the Sustainability Appraisal (ref. S-NLP 3) finding this distribution of growth to achieve an appropriate balance of the likely positive and negative effects of development when compared against alternatives. This is further supported by Section 5 of the NPPF which promotes the identification of a mix of sites, in recognition of the different timescales development comes forward at site allocations, to meet the District's development needs across the plan period.
- 1.1.13. As such, the spatial strategy is supported by the NPPF as an appropriate strategy which is consistent with national policy, as required for the Plan to be sound (per paragraph 35).

Question 3: Have all realistic options for the distribution of development within the District been identified and considered robustly in the formulation of the Plan?

- 1.1.14. WDH agree that the draft Plan has considered a suitable range of realistic options for the distribution of development, comprising the continuation of the adopted Plan's strategy, proportional growth, urban focus, strategic site focus, market town focus and large village focus. Chapter 4 of the Sustainability Appraisal (ref. S-NLP 3) outlines the findings of the assessment of each potential distribution against the SA Objectives, concluding RO3 (Urban Area and Market Towns Focus) as the most suitable option, continuing to reflect the adopted Plan's strategy while balancing the availability and suitability of sites identified to meet the future development needs of the District.
- 1.1.15. In formulating the Plan, the proposed spatial strategy, including draft allocations (as assessed in the Sustainability Appraisal) and the settlement hierarchy, are aligned to this identified distribution of development, and so the Plan meets the soundness tests of the NPPF (paragraph 35, 2023) in being appropriate and effective.

Issue 2: Delivering Homes

Question 1: The Settlement Hierarchy Assessment January 2025 [PPL-NLP1] scores settlements and groups them according to a number of sustainability factors, which provides the settlement hierarchy in the District. That underpins the hierarchy set out in Policy DS01 and AP01. Is the methodology in determining the Plan's settlement hierarchy robust and the outcomes accurate? Is the distribution of development between the tiers of settlements justified and how has it been established?

- 1.1.16. The Settlement Hierarchy Assessment provides a robust methodology for assessing the relative sustainability of settlements across the District, reflecting the existing and planned expansions to infrastructure to support development over the next Plan period. The

approach appropriately recognises the role of Market Towns as the primary focus (alongside the Leicester Urban Area) for growth within a largely rural District, as centres of infrastructure and services to support future housing development. The resulting distribution of development is therefore justified and reflects the availability of services, facilities, employment opportunities and transport connections, aligning growth and infrastructure as required by paragraph 11 of the NPPF (2023).

- 1.1.17. WDH support the identified settlement hierarchy and resultant distribution of development at each tier of settlement, but support the introduction of further flexibility within this by ensuring draft Policy DS01 and supporting Policy SA01 note the number of homes in each location as a minimum. This will ensure the Plan is fully effective in meeting its identified development needs, as required to be sound as outlined in paragraph 35 of the NPPF.

Question 2: Is the proposed distribution of housing supported by the evidence in the Strategic Housing and Economic Land Availability Assessment (SHELAA), [HSG-NLP4 to 6] settlement hierarchy, and SA, and will it lead to an appropriate pattern of housing growth?

- 1.1.18. As outlined above, WDH believe the proposed distribution of housing is supported by the evidence base, including the SHELAA, Sustainability Appraisal and Settlement Hierarchy Assessment, confirming that an appropriate balance of the likely positive (including meeting the District's housing requirement) and negative effects of development will be achieved in locations where suitable sites have been identified. The focus on Market Towns such as Lutterworth provides an appropriate and sustainable pattern of growth, recognising their role as centres of employment and their ability to accommodate additional housing development, and so reflects a sound Plan strategy as required by the NPPF (paragraph 35).

Issue 3: Housing Need and Requirement

Question 1: The Plan area's housing need is calculated using the standard method set out in PPG [ID: 2a-002-20241212] [ID:2a-004-20201216] That results in a Local Housing Need (LHN) figure for the District of 534 homes per year. The Council in its response to the Panel's PQ 16 confirms that its latest calculation of LHN is in 2022 [HDC2]. The Plan's housing requirement includes an element of LHN plus an allowance for unmet needs in the Leicester City. The Plan's housing requirement is the same as the housing to be delivered by this Plan.

In deriving the Plan's housing requirement from the calculation of LHN, should supply prior to the latest calculation of LHN be taken into account? Given that the PPG explains that the purpose of the affordability adjustment applied in the Standard Method takes account of past delivery would this be a justified approach consistent with national policy? [ID: 2a-011-20241212] [2a-011 20190220]

- 1.1.19. WDH broadly supports the Council's approach to calculating Local Housing Need (LHN) in accordance with national policy and guidance. The use of the standard method provides a transparent and consistent basis for establishing minimum housing requirements, as required by paragraph 61 of the NPPF. It is appropriate that the Council's housing requirement reflects the most up-to-date assessment of need and seeks to respond positively to identified housing requirements over the Plan period, using the LHN based on the standard method as a minimum and applying a 'medium growth option' following identification in the Sustainability Appraisal (ref. S-NLP 3) as the most appropriate option for reaching a balance of positive and negative impacts of development, while contributing towards the unmet needs of Leicester City which WDH support.
- 1.1.20. Where appropriate, for the Plan to be positively prepared (as required to be sound, per paragraph 35 of the NPPF), growth in the District should be maximised. Draft Policy DS01

makes provision for this in noting a “*minimum*” of 6,422 homes across identified allocations; the supporting policies (i.e. draft Policy SA01) should reflect this wording to ensure the Plan is fully effective in meeting its identified development needs, as required to be sound as outlined in paragraph 35 of the NPPF.

Issue 5: Housing Supply

Question 1: PPG confirms that a Plan’s housing requirement may be set as a stepped requirement in plan-making where this is appropriate to reflect circumstances within the area. In doing so, planning authorities will need to set out the stepped requirement in the strategic housing policy and provide evidence to support this approach. [ID: 68-012-20190722].

It also confirms that a stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and/or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. [ID: 68-021 20190722]

The Plan includes a stepped housing requirement. What is the robust justification specific to this Plan’s circumstances to justify the approach taken?

1.1.21. WDH agree with the proposed approach to a stepped housing requirement in the context of the contribution of HDC towards Leicester City’s unmet housing needs and the differing periods covered by the respective Local Plans. The approach provides a pragmatic mechanism for addressing identified housing needs while recognising the Plan period and supporting evidence base of Leicester City’s adopted Plan does not cover the full Plan period for HDC’s draft Plan. The stepped approach therefore assists in maintaining a deliverable and realistic housing trajectory which is supported by evidence, as required by paragraph 35 of the NPPF.

Question 2: Will the Plan provide a supply of deliverable and/or developable sites and/or broad locations to meet the full housing requirement for the whole of the Plan period?

1.1.22. WDH supports the broad range of sites identified by the Council to meet its housing requirement. The portfolio includes strategic allocations, allocated sites progressing through the planning process, existing commitments (including the Lutterworth East SDA) and smaller sites distributed across the settlement hierarchy. This diversified approach reduces reliance on any individual allocation and assists in maintaining flexibility to ensure sufficient housing is provided throughout the Plan period. Leicester Road, Lutterworth (ref. L1) represents an example of a specific site which is sustainable and deliverable, and capable of making an important contribution towards housing delivery, while supporting the wider requirement (per Section 5 of the NPPF) for a range of sites to contribute towards achieving the District’s development needs.

Question 9: Would the Plan deliver an appropriate balance between size of site, given the longer lead in times associated with larger sites? Would the Plan’s reliance on large strategic sites, including East of Lutterworth Strategic Development Area (SDA), put delivery at undue risk? And if so, how would this be mitigated?

1.1.23. WDH believe the Plan provides an appropriate balance between strategic, medium-sized and smaller housing sites, identifying and allocating sufficient sites of each scale complement each other and achieve the identified growth needs of the District.

- 1.1.24. This diversified approach to housing delivery reduces risk and avoids over-reliance on any single site or development, as supported by Section 5 of the NPPF, and reflecting the identified development strategy (draft Policy DS01) of the Plan. While strategic allocations have historically and will continue to play an important role, the inclusion of sites such as Leicester Road, Lutterworth (ref. L1) alongside other categories of sites is suitable to provides greater resilience within the housing trajectory and ensure the Plan is effective in delivering the identified housing needs of the District (per paragraph 35 of the NPPF).