



Harborough Local Plan (March 2025) Examination

**Response to Inspectors' Matters, Issues
and Questions
On behalf of IM Land**

Matter 3

Amount and Distribution of Development

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1 Introduction

- 1.1.1 Stantec is instructed by IM Land to submit this hearing statement in response to the questions posed under Matter 3 of the Inspectors' Stage 2 Matters, Issues and Questions ('ID9').
- 1.1.2 This statement should be read alongside the representations Stantec submitted on behalf of IM Land in response to the Pre-Submission Regulation 19 consultation. IM Land is promoting the draft allocation at Frolesworth Road, Broughton Astley (site ref: BA1) and has also submitted a hearing statement in response to Matter 7 which addresses settlement/site-specific matters.
- 1.1.3 This statement is limited to responding to questions posed under the following issues under Matter 3:
- Issue 2: Delivering Homes
 - Issue 3: Housing Need and Requirement



2 Matter 2: Amount and Distribution of Development

2.1 Issue 2: Delivery Homes

Policy DS01 Development Strategy: Delivering Homes

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?

- 2.1.1 The Council's Settlement Hierarchy Assessment dated January 2025 (PPL-NLP1) attributes Broughton Astley a 'settlement audit score' of 145. This falls marginally below the threshold above which settlements can be defined as Market Towns. Broughton Astley is demonstrably a highly sustainable settlement and the most sustainable of the Large Villages in the district.
- 2.1.2 The Council's assessment and rationale for the distribution of development proposed for Broughton Astley is summarised on page 36 of PPL-NLP1. Whilst the Council's assessment is generally supported, and IM Land support Broughton Astley's identification as a Large Village, more up-to-date evidence is now available to demonstrate that Broughton Astley has greater capacity to accommodate sustainable development.
- 2.1.3 In the past 12 months, the Council has resolved to grant planning permission for the following windfall sites on the edge of Broughton Astley that are not proposed for allocation in the Local Plan:
- Land at the End of Crowfoot Way, Broughton Astley, 30 dwellings (25/01236/FUL) granted at committee on the 21 July 2026.
- 2.1.4 The Broughton Astley Neighbourhood Development Plan Review 2025, which has passed examination and will be subject to a referendum in due course, includes an allocation at Witham Villas for approximately 138 dwellings.
- 2.1.5 In addition, IM Land submitted a planning application for up to 550 homes (plus other community infrastructure and facilities) on the draft allocation (ref: BA1) on land off Frolesworth Road, Broughton Astley. This exceeds the draft allocation for the site of approximately 475 dwellings (a further addition of 75 dwellings).
- 2.1.6 In combination, this clearly demonstrates greater capacity to accommodate new housing at Broughton Astley, as one of the most sustainable locations in the district.
- 2.1.7 Taking the above into account, IM Land recommend that Policy DS01 is modified to reflect the increased number of homes expected to be delivered at Broughton Astley over the plan period.

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?

- 2.1.8 As set out above, there is up-to-date evidence of additional capacity at Broughton Astley that should be taken into account in examining the Local Plan. This demonstrates that there is additional capacity at Broughton Astley, in addition to the proposed allocation of Land off Frolesworth Road (ref: BA1) that was discounted through the SHELAA.



- 2.1.9 The increased capacity for new homes should be reflected in an increased allocation to Broughton Astley and the Large Villages in Policy DS01.

3. Would the Plan's spatial strategy strike the right balance between the need for development across brownfield and greenfield sites and any related impact on housing affordability?

- 2.1.10 Yes.

4. How has the Plan's aim to accommodate some of Leicester's unmet housing need been reflected in the Plan's spatial strategy? Does it strike the right balance between promoting development between the Leicester urban area and the District's market towns?

- 2.1.11 We have no comment.

2.2 Issue 3: Housing Need and Requirement

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]1 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]

- 2.2.1 No, in our view, housing supply prior to 1st April 2026 as the start of the most recent monitoring year should be deleted and the Local Plan use this as the base date for its overall spatial strategy and housing requirement.
- 2.2.2 Plainly, there has been no plan-led approach to helping to accommodate Leicester's unmet housing need, and manipulating the housing retrospectively would not in our view be justified.
- 2.2.3 As the Council has accepted that it should help accommodate 1,968 homes of Leicester's unmet housing need, this can be added on an annualised basis for the revised plan period.

2. The Panel notes the Council's response to the Panel's PQ16 [HDC2]. If the Panel were to decide that the Plan's housing supply prior to the latest calculation of LHN should be discounted from its housing requirement, what is the implication for the Plan housing requirement?

- 2.2.4 The implications of discounting housing supply prior to the latest calculation of LHN is that the requirement will continue to be 543 homes per year, plus contributing towards Leicester's unmet housing need.



- 2.2.5 The main issue will be the material reduction in housing supply (completions), as identified in Table 2 of the Local Plan for the period 2020-2023 and as updated to 31st March 2025 in the latest published AMR (S-NLP 8). As a result of discounting the 'surplus' achieved prior to 1st April 2025, it is likely that additional land supply will need to be identified. However, this is unlikely to be of a scale that is unachievable, particularly when taking account of recent additional capacity that the Council can potentially include in its supply, including additional capacity at Broughton Astley.

3. NPPF paragraph 63 sets out, in the context of establishing need, the size, type and tenure of housing needed for different groups in the community that should be assessed and reflected in planning policies. The non-exclusive list of those with specific housing needs includes those who require affordable housing, families with children, older people, students, people with disabilities service families, travellers, people who rent their homes and people wishing to commission or build their own homes. How has the Plan assessed and sought to meet the needs of those with specific housing needs as required by NPPF paragraph 63?

We have no further comments.

4. NPPF paragraph 67 sets out that strategic policies should set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Would the Plan be consistent with this national policy?

- 2.2.6 As above, for the Local Plan to be justified and effective, Policy DS01 should be modified to reflect the increased capacity for new housing development at Broughton Astley. This includes the additional commitments that the Council has approved and the increased capacity of the proposed Local Plan allocation at Frolesworth Road that IM Land is promoting. Please refer to our Matter 7 hearing statement for further details.

