

Matter 7: Locating Development in the Right Place

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 2: Key Development Sites - Policies SA01, SA02, SA03, SA04, DS01 and DS02

Question 1: Are the following proposed residential development/mixed use and employment allocations justified, based on up-to-date evidence, effective, and consistent with national policy?

Site L1: Land off Leicester Road (230 homes)

Plan Policies SA01, DS01

- 1.1.8. WDH supports the allocation of Site L1 for residential development in recognition of the site's role as a sustainable and logical extension to Lutterworth. Due to this, the site is suitably located to contribute towards meeting identified housing needs, with its allocation supported by the SHELAA (ref. HSG-NLP 4) and Sustainability Appraisal (ref. S-NLP 3).

- 1.1.9. However, in recognising the suitability of the site for development and supporting making effective use of land in accordance with Section 11 of the NPPF, the wording of the allocation should be amended to “*a minimum of 230 homes*” (italics added for emphasis) to provide flexibility and maximise the site’s contribution towards housing need where additional development can be sustainably accommodated, as supported by technical evidence.

Question 3: For each individual site (housing/employment and mixed use) please answer the following questions. The Council should address any site-specific concerns raised in representations, in addition to the questions outlined in respect of individual sites.

- 1.1.10. Site L1 extends to approximately 9.7 hectares and identified in the draft Plan to deliver around 230 dwellings. WDH supports the allocation and considers it to be a suitable, available and deliverable site capable of contributing towards the District’s housing requirements during the Plan period, as indicated by the planning application (ref. 26/00447/FUL) currently under consideration.
- 1.1.11. The site is located on the northern edge of Lutterworth adjacent to the existing built-up area and is well-related to existing services, facilities and employment opportunities within the town. The proposed allocation would provide a logical and sustainable extension to the settlement, consistent with the Plan’s spatial strategy and the role identified for Lutterworth as a Market Town.
- 1.1.12. A planning application (ref. 26/0447/FUL) has been submitted for residential development of the site and discussions are ongoing with the Council regarding a number of technical matters. This provides confidence regarding the site’s availability, suitability and deliverability.
- 1.1.13. The development would deliver a range of benefits, including the provision of market and affordable housing, public open space, sustainable drainage infrastructure, biodiversity enhancements and associated landscaping. The site can be accessed from Leicester Road and technical assessments accompanying the planning application demonstrate that environmental and infrastructure considerations can be appropriately addressed through the planning process.
- 1.1.14. Whilst part of the western section of the site falls within an Area of Separation, an agreed approach with HDC integrates this area within the development for use as open space, landscaping, SuDS and biodiversity enhancements, thereby maintaining the function of the designation whilst facilitating delivery of the allocation. As such, the boundary of the proposed allocation remains appropriate.
- 1.1.15. WDH therefore confirm Site L1 is available, suitable, achievable and capable of making an important contribution towards housing supply within the early phases of the Plan period.
- 1.1.16. To maximise the effectiveness of the contribution of the site towards meeting the housing needs of HDC, WDH believe a Main Modification should be made to Policy SA01 to ensure reference to 230 dwellings is a minimum, with the delivery of additional dwellings appropriate where supported by technical evidence. Subsequent design work undertaken in support of planning application ref. 26/0447/FUL demonstrates that the site is capable of accommodating a greater number of dwellings whilst continuing to provide the necessary open space, landscaping, drainage infrastructure and biodiversity enhancements.
- 1.1.17. To maximise the efficient use of land, as promoted by Section 11 of the NPPF, and maximise how effectively the District’s housing requirements can be delivered, per paragraph 35 of the NPPF, the allocation should be for a minimum of 230 dwellings. This would provide flexibility for the final scheme to respond to detailed design work and changing circumstances through the development management process.
- 1.1.18. Accordingly, WDH recommends that the policy wording be amended to state that Site L1 will deliver “*a minimum of 230 dwellings*” (italics added for emphasis), thereby ensuring the allocation remains effective, flexible and consistent with national policy objectives (per

NPPF paragraph 35) to significantly boost the supply of homes, as outlined at paragraph 60 of the NPPF.

Lutterworth Site L1

Housing Sites L1: Land off Leicester Road (230 homes) and L2: Land at M1 Junction 20/Swinford Road (90 homes)/Policy SA01

Question 1: Is the wording of the criteria within the policy effective? In particular how does the allocation relate to the Area of Separation? What is meant by ‘respect’?

- 1.1.19. As outlined in our response to Matter 5, to ensure the policy is fully effective (and sound, per NPPF paragraph 35), greater flexibility should be incorporated into the wording for Site L1 to enable a higher number of homes to be accommodated where appropriate. While an approach to integrating the Area of Separation within the site has been agreed with HDC through the application under consideration, Policy SA01 and supporting Policy DS04 should clarify that where appropriately considered, the Area of Separation may be integrated within the development of the site while maintaining its function in preserving the character of Bitteswell.
- 1.1.20. Furthermore, as outlined above, for the policy and delivery of homes at the site to be fully effective, the wording of the policy should refer to 230 homes as the minimum to be delivered.

Question 2: What is the significance of the risk of surface water flooding identified in criterion 5?

- 1.1.21. As confirmed in the Flood Risk Assessment and Drainage Strategy submitted with the application (ref. 26/00447/FUL) for the development of the site, the identified surface water flood risk does not present a constraint to the development of Site L1 owing to its location within the western portion of the site where no dwellings will be situated. The requirement in criterion 5 largely duplicates requirements elsewhere in the Plan and is therefore not considered necessary.
- 1.1.22. In any event, the western portion of the site, where development is more constrained, would remain free from built development and could instead accommodate open space, biodiversity enhancements and SuDS. This provides an appropriate means of responding to surface water drainage and flood risk as part of the development.

Question 3: Are there any nearby activities that may be impacted by the proposed housing with reference to the agent of change? If so, how is this risk to be mitigated?

- 1.1.23. An Odour Assessment has been submitted in support of the application (ref. 26/00447/FUL) currently under consideration, and is supplemented by ongoing engagement with the relevant parties to ensure any potential impacts are appropriately assessed and mitigated so that the proposed residential development can be accommodated alongside the existing use. As such, the development of the site will be in accordance with national policy and ensure there are no unacceptable impacts on new development.

Question 4: How does the site relate to nearby existing commitments and allocations?

- 1.1.24. Site L1 is well-related to existing and committed development, including the Lutterworth East Strategic Development Area which will be situated to the east of the site. The proximity of Leicester Road, Lutterworth (ref. L1) to this strategic growth area reinforces the sustainability of the location and would complement the delivery of Lutterworth's identified housing needs across the plan period by providing sites of differing scales, as supported by Section 5 of the NPPF.

- 1.1.25. Site L1 benefits from good accessibility, with the vehicular proposed access from Leicester Road (A426) capable of coordinating with the wider highway arrangements associated with the Lutterworth East SDA and its connection from the A426 across the M1. This would allow Site L1 to be integrated effectively with existing and planned development in the area. The approach as submitted with application (ref.) 26/00447/FUL is supported by National Highways, confirming its suitability.