



BROUGHTON ASTLEY PARISH COUNCIL

Representation to the Planning Inspectorate

Examination of the Harborough District Local Plan 2020–2041

Proposed allocation BA1 – Land off Frolesworth Road, Broughton Astley (475 homes)

This representation has been reorganised under the relevant headings and questions in the Inspectors' Stage 2 Matters, Issues and Questions sheet; some points are cross-referenced where they are relevant to more than one examination question.

In the interests of transparency, the Parish Council wishes to declare that AI-assisted tools have been used to support the organisation and drafting of parts of this submission, given the complexity of the planning matters under consideration. The content has been reviewed and approved by the Parish Council, which retains full responsibility for the representations made.

Summary of BAPC's position

Broughton Astley Parish Council (BAPC) raises serious concerns regarding the site-selection process undertaken by Harborough District Council (HDC), which resulted in land off Frolesworth Road being identified as the preferred strategic housing allocation for Broughton Astley.

The Parish Council considers that the process did not adequately establish or demonstrate that the proposed allocation was the most appropriate option for the village when assessed against reasonable alternatives, including sites that residents subsequently identified as preferable through a detailed local consultation exercise.

- The limited scope of the initial public engagement undertaken by HDC in February 2024.
- The absence of site-specific information and meaningful comparison of alternative sites at that event.
- The apparent identification of Frolesworth Road as HDC's preferred option before the Parish Council's concerns and the views of residents had been fully considered.
- The substantial local consultation undertaken by BAPC, which identified four alternative sites with a combined indicative capacity of 508 dwellings.
- The unresolved concerns relating to flooding, highways, infrastructure, sewerage capacity, local services, landscape and the balance of the village.



- HDC's subsequent decision not to agree to a proposed Memorandum of Understanding (MoU), despite extensive correspondence intended to secure consideration of the alternative sites during the Local Plan examination process.

BAPC recognises the need for the Local Plan to identify sufficient housing land to meet its requirements. However, the Parish Council submits that the identification of a housing allocation must be supported by a transparent, robust and evidence-based assessment of reasonable alternatives, including their suitability, availability, achievability and deliverability.

Accordingly, BAPC requests that the Inspector scrutinise the evidence supporting the selection of Frolesworth Road and consider whether the proposed allocation represents the most appropriate strategy for accommodating the housing requirement in Broughton Astley.

The Parish Council asks that the four alternative sites identified through its consultation be properly assessed and, where supported by the necessary evidence, substituted for the proposed Frolesworth Road allocation.



Matter 7: Locating Development in the Right Place

Issue 2: Key Development Sites — Policy SA01

Relevant Inspector question: Question 1 — whether the proposed residential/mixed-use and employment allocations are justified, based on up-to-date evidence, effective and consistent with national policy.

Site-specific focus: BA1 — Land off Frolesworth Road, Broughton Astley (475 homes). The Inspectors' site-specific questions include whether sufficient community infrastructure is available (Question 1), whether the highways impact can be adequately alleviated (Question 3), and the policy wording and other site constraints.

5. Concerns regarding the proposed Frolesworth Road allocation

BAPC has consistently raised concerns about the suitability of Frolesworth Road as the principal housing allocation for Broughton Astley.

These concerns are material to whether the proposed allocation represents an appropriate and sustainable approach to meeting the housing requirement.

Site-specific matters relevant to BA1

5.1 Flood risk

Frolesworth Road has a history of serious flooding, and parts of the surrounding area are subject to significant flood-risk considerations.

BAPC is concerned that additional development in this location could increase pressure on an area already affected by flooding and could have implications for existing residents, highway users and surrounding land.

The Parish Council requests that the Inspector examine the available flood-risk evidence, including the relevant flood-risk assessments, drainage strategy, surface-water management proposals and any necessary mitigation.

The assessment should establish whether the proposed allocation can be delivered safely and sustainably without increasing flood risk elsewhere and whether the identified mitigation measures are sufficiently robust and deliverable.



5.2 Highways and access

The proposed development raises concerns about highway capacity, traffic movements and access arrangements.

Frolesworth Road and its junction arrangements include a recognised local pinch point, and BAPC is concerned about the ability of the existing highway network to accommodate the additional traffic generated by the development of this scale.

The Parish Council requests that the Inspector examine the transport evidence supporting the allocation, including access arrangements, junction capacity, highway safety, traffic distribution and the deliverability and funding of any necessary improvements.

The assessment should also consider whether the proposed development can be accommodated without unacceptable effects on existing residents and highway users.

5.3 Infrastructure, sewerage and local services

BAPC is concerned that the proposed allocation could place additional pressure on existing infrastructure and services.

The Parish Council has raised concerns about sewerage capacity, the availability of local services and the infrastructure necessary to support further residential development.

The Local Plan should demonstrate that the infrastructure requirements associated with the proposed allocation have been identified and that there is a credible and deliverable strategy for providing the necessary improvements at the appropriate time.

BAPC requests that the Inspector consider whether the evidence supporting the Frolesworth Road allocation adequately addresses these requirements and whether the same assessment has been applied to the alternative sites.

5.4 Village character, landscape and settlement balance

The scale and location of additional housing are important considerations for the future development of Broughton Astley.

BAPC is concerned about the effect of the proposed allocation on the balance and character of the village, together with its landscape and environmental implications.

The Parish Council considers that the allocation strategy should be assessed in the context of the existing settlement, the distribution of development and the need to ensure that growth is supported by appropriate infrastructure and services.

These considerations should form part of a balanced assessment of the Frolesworth Road proposal against the alternative sites identified through the Parish Council's consultation.



Infrastructure delivery and mitigation

The Parish Council notes that the Inspectors' Stage 2 Matters, Issues and Questions, published on 21 September 2026, raise several issues directly relevant to the proposed BA1 allocation at Frolesworth Road.

At pages 28–29, the Inspectors specifically question whether Broughton Astley has sufficient community infrastructure to support a further 475 dwellings and whether the highways impact of the proposed development can be adequately alleviated. These questions reflect concerns previously raised by BAPC regarding the capacity of local infrastructure, highway constraints and the cumulative impact of further development.

The Inspectors also raise wider questions at pages 16–19 concerning the adequacy of transport evidence, the costing and funding of mitigation measures, infrastructure delivery and the deliverability of the Plan's development strategy.

BAPC submits that these matters reinforce the need for HDC to demonstrate, through clear and proportionate evidence, that the Frolesworth Road allocation is justified and that the infrastructure and mitigation required to support it can be delivered. The Parish Council also asks that the four alternative sites identified through its consultation be assessed consistently against the same criteria, including their capacity, availability, suitability and deliverability.

BAPC recognises that the questions raised by the Inspectors do not, in themselves, establish that the proposed allocation is unsound. However, they identify material matters that require satisfactory evidence and resolution before the allocation can be considered justified.

Evidence of consultation and consideration of reasonable alternatives

HDC engagement and identification of the preferred site

On 7 February 2024, HDC held a public drop-in consultation event in Broughton Astley between 3.30 pm and 7.30 pm. The event presented the overall housing strategy but, according to BAPC, did not provide detailed information about the proposed Frolesworth Road development or a comparison of potential alternative sites. The issues raised by BAPC included village character, infrastructure and sewerage capacity, highway capacity and access constraints, flooding, local services and landscape/environmental effects.

At a meeting between HDC and BAPC on 6 August 2024, an HDC officer indicated that Frolesworth Road was HDC's preferred site. BAPC asks the Inspector to examine whether alternative sites remained genuinely open to consideration and whether the eventual selection was based on a balanced, consistent and transparent assessment of the available evidence.



BAPC consultation and preferred alternatives

BAPC's consultation took place over four weeks, from 26 August 2025 to 24 September 2025, and included four public engagement events. It presented seven potential sites that could contribute towards accommodating approximately 475 additional dwellings, with residents invited to express their preferences through a written survey.

The consultation identified the following four alternative sites as the preferred options:

- | | |
|------------------------------|---------------|
| • Cottage Lane | 250 dwellings |
| • Witham Villa | 138 dwellings |
| • Lagan Homes (Crowfoot Way) | 30 dwellings |
| • Land off Blockley Road | 90 dwellings |

The combined indicative capacity is 508 dwellings, 33 more than the stated requirement of 475. BAPC recognises that local preference does not, by itself, determine the planning merits of each site. The alternatives nevertheless warrant proper comparative assessment against the same criteria applied to BA1.

Memorandum of Understanding (MoU)

6. Memorandum of Understanding and attempts to secure consideration of alternatives

Following discussions with HDC planning officers on 20 October 2025, the Parish Council understood that a Memorandum of Understanding (MoU) could be prepared to address the concerns raised about the proposed allocation and provide a mechanism for the alternative sites to be considered as part of the Local Plan examination.

The MoU was prepared with input from HDC officers to establish a basis for the alternative sites preferred by Broughton Astley residents to be considered during the Local Plan examination.

BAPC made repeated efforts to progress the document and secure its completion before the examination. However, despite extensive correspondence over several months, the MoU was not formally agreed and was ultimately allowed to fall away. BAPC considers this a missed opportunity to establish an agreed mechanism for the alternative sites to be considered alongside the proposed Frolesworth Road allocation.

The chronology of BAPC's efforts to progress the MoU is set out below:

- 15 December 2025: BAPC officers submitted the MoU to HDC.
- 17 December 2025: HDC confirmed receipt.
- 19 January 2026: BAPC followed up by email.
- 21 January 2026: The document was resubmitted.
- 26 February 2026: A revised version was provided.
- 9 March 2026: BAPC requested that the document be signed.
- 1 April 2026: Further correspondence was sent to progress the matter.



- 27 April 2026: Councillor Grafton-Reed also pursued the outstanding matter.
- 29 June 2026: BAPC again contacted HDC to seek progress and ensure the document could be included in the examination submission.

Despite these repeated efforts, the MoU remained unresolved. BAPC is disappointed that the document did not progress to completion, given the time invested in its preparation and the opportunity it presented to facilitate consideration of the alternative sites.

The Parish Council recognises that the absence of an agreed MoU does not determine the soundness of the Local Plan. However, the circumstances are relevant to the Inspector's consideration of whether BAPC's concerns and the reasonable alternatives identified through its consultation have been adequately addressed.

BAPC therefore asks the Inspector to consider the proposed MoU, the associated correspondence and the supporting consultation evidence when assessing whether the selection of Frolesworth Road is justified and whether the alternative sites have been given proper consideration.

Implications for soundness and requested outcome

BAPC considers that the matters set out in this representation raise questions about whether the proposed Frolesworth Road allocation has been justified through a proportionate and robust assessment of reasonable alternatives.

BAPC asks the Inspector to consider whether:

1. The site-selection process has been sufficiently transparent and evidence-based.
2. The concerns raised by residents and the Parish Council have been adequately considered.
3. The four alternative sites identified through the BAPC consultation have been assessed consistently against the relevant site-selection criteria.
4. The proposed Frolesworth Road allocation is supported by sufficient evidence concerning flooding, highways, infrastructure, sewerage, services and environmental constraints.
5. The alternative sites could provide a more appropriate and deliverable strategy for meeting the housing requirement for Broughton Astley.
6. The Plan's proposed allocation remains justified when assessed against the reasonable alternatives and the evidence available for the examination.

The Parish Council's concern is that the selection of Frolesworth Road should not be treated as justified solely because it has been identified as HDC's preferred option. Its suitability and deliverability must be demonstrated through the evidence, and reasonable alternatives must be considered fairly.



BAPC requests that the Inspector consider recommending that the proposed Frolesworth Road allocation be removed or amended and that the four alternative sites be assessed for allocation in their place:

Proposed alternative allocation	Dwelling capacity
Cottage Lane	250 dwellings
Witham Villa	138 dwellings
Lagan Homes (Crowfoot Way)	30 dwellings
Land off Blockley Road	90 dwellings
Total alternative provision	508 dwellings

The Parish Council considers that these sites offer a potential alternative means of accommodating the housing requirement for Broughton Astley.

This request is subject to the Inspector being satisfied, based on the relevant evidence that the alternative sites are suitable, available, achievable and deliverable, and that the revised allocation strategy would comply with the applicable planning policy requirements.

If the evidence is insufficient to establish that the alternatives can be substituted directly, BAPC requests that the Inspector require a transparent comparative assessment of the sites and the proposed Frolesworth Road allocation before the final allocation strategy is determined.

Appendix A – Comparative Assessment of Reasonable Alternative Sites



Conclusion

Broughton Astley Parish Council supports the identification of an appropriate and deliverable housing strategy for the village but considers that the proposed Frolesworth Road allocation has not been adequately justified in the context of the concerns raised and the reasonable alternatives available for consideration.

The initial public engagement undertaken by HDC did not provide residents with detailed information about the proposed site or a meaningful comparison of alternatives. BAPC subsequently undertook its own consultation, presenting seven potential sites and identifying four alternative locations preferred by residents.

Those four sites have a combined indicative capacity of 508 dwellings, exceeding the stated requirement of 475 dwellings. Their potential to accommodate the housing requirement warrants proper consideration through the examination process.

The Parish Council repeatedly sought to secure consideration of these alternatives, including through the preparation and submission of a proposed MoU developed with input from HDC officers. Despite repeated correspondence and efforts by BAPC to progress the document over several months, the MoU was not brought to a formal conclusion and was ultimately allowed to fall away. Consequently, the opportunity to establish an agreed mechanism for the alternative sites to be considered during the examination was lost.

BAPC therefore respectfully requests that the Inspector scrutinise the evidence supporting the Frolesworth Road allocation, consider the concerns set out in this representation and assess the four alternative sites on a consistent and transparent basis.

The Parish Council's preferred outcome is for the proposed Frolesworth Road allocation to be replaced by the four alternative sites, subject to the necessary evidence demonstrating their suitability and deliverability.

BAPC considers that this would provide an opportunity to secure a more appropriately justified housing strategy for Broughton Astley, reflecting both the planning evidence and the concerns and preferences expressed by the local community.

Approved and submitted on behalf of Broughton Astley Parish Council.

Comparative Assessment of Reasonable Alternative Sites

Broughton Astley Parish Council's report, *Analysis – Potential Housing Site Allocations from Public Consultations*, dated 25 November 2025, provides evidence that several alternative sites have been considered against relevant planning criteria, including site capacity, access to amenities, traffic impact, flood risk, environmental impact and potential deliverability.

The report identifies Cottage Lane, Crowfoot Way, Blockley Road and Witham Villa as the four sites receiving the highest levels of feedback and consequently examined in greater detail. Its comparative assessment identifies strengths across these sites, including access to amenities, limited anticipated traffic or environmental impact, and potential deliverability. Cottage Lane was identified as the strongest overall performer in the qualitative assessment, while Witham Villa was subsequently selected by the Parish Council as its preferred site for allocation within the emerging Neighbourhood Plan.

The report provides an initial evidence base for considering whether the housing requirement for Broughton Astley could be met through a combination of smaller sites rather than relying exclusively on the proposed allocation of 475 dwellings at Frolesworth Road. The indicative capacities recorded for the four alternatives suggest that, in combination, they could provide a housing total broadly comparable to or exceeding that requirement. However, the precise capacity and contribution of each site would need to be confirmed through further assessment.

The Parish Council does not suggest that consultation preference or this qualitative analysis alone establishes that the alternative sites are suitable, available and deliverable. Rather, it submits that the evidence provides a reasonable basis for those sites to be assessed consistently against the same criteria applied to the proposed Frolesworth Road allocation.

In particular, the assessment should address land availability, realistic housing capacity, access and highway impacts, flood risk and drainage, infrastructure requirements, environmental and landscape effects, and anticipated delivery timescales. The evidence should also resolve any uncertainty in the assessment of flood risk at Frolesworth Road, where the consultation report records both that no flood risk was known and that flood-risk and road-infrastructure issues would require resolution.

The Parish Council therefore asks the Inspector to consider this consultation analysis alongside the Sustainability Appraisal, site-selection evidence and the matters raised in the Inspectors' Stage 2 questions. HDC should demonstrate why the proposed Frolesworth Road allocation is justified in preference to reasonable alternatives, and whether the alternatives could provide a more appropriate and deliverable means of meeting Broughton Astley's housing requirement.

Evidence table: Frolesworth Road allocation and alternative sites

Source: Broughton Astley Parish Council, Analysis – Potential Housing Site Allocations from Public Consultations, 25 November 2025, particularly pp. 2–9.

SITE	INDICATIVE HOUSING CAPACITY IN THE REPORT	EVIDENCE SUPPORTING THE SITE	ISSUES OR QUALIFICATIONS REQUIRING ASSESSMENT
BA1 – Land off Frolesworth Road (HDC Local Plan allocation)	475 homes	The Parish Council's consultation report records that some respondents supported the site, citing its edge-of - settlement location, proximity to shops and schools, potential for phased development and opportunities for infrastructure improvements.	The report identifies road infrastructure and flood risk matters requiring resolution. Its Site 3 assessment also describes the site as having 'no known flood risk', so the evidence needs to be clarified rather than treating flood risk as either established or absent. Highway capacity, community infrastructure and mitigation require further scrutiny.
Site 1 – Broughton Chase / Crowfoot Way	Approximately 30-35 homes	Existing residential context and infrastructure; no identified flood risk; limited anticipated traffic and environmental concerns; nearby school capacity; and prior planning approval, which the report identifies as supporting feasibility and potential short-term delivery.	Confirm the status and scope of the prior planning approval, remaining capacity, site availability and current delivery timescale.
Site 2 – Cottage Lane / Aldi Estate	Approximately 250-260 homes	The report identifies access to retail and other amenities, proximity to the bypass, no identified flood risk, potential for multiple access points, limited	Confirm access arrangements, highway evidence, land availability, infrastructure capacity and delivery assumptions

Appendix A

		landscape and infrastructure concerns, and potential short-term delivery. It identifies this as the strongest overall performer in its qualitative comparison and the site with the strongest community preference.	through technical evidence.
Site 4 – East of Dunton Road / Blockley Road	Approximately 314 homes across the site; 95 homes identified for this consultation.	Adjacent to existing development; strong highway connections; low reported environmental and visual impact; proximity to schools and amenities; and the site is described as under option. The report identifies good deliverability and limited disruption.	Clarify the distinction between the full site capacity and the 95 homes put forward in the consultation. Confirm the extent of land available, the proposed development area, access arrangements, flood-risk evidence and delivery timescale.
Site 5 – Witham Villa	Approximately 125 – 138 homes	Proximity to Aldi, the sports centre and proposed medical centre; adjacency to existing housing; good access; no flood concerns identified in the report; low landscape sensitivity; and opportunities for multiple access points. The report identifies it as a strong performing medium-sized option and the Parish Council subsequently selected it as its preferred site for the emerging Neighbourhood Plan.	Confirm land availability, access feasibility, infrastructure requirements, and deliverability through current evidence. The report's assessment should be considered alongside the evidence required for the Local Plan examination.

Site descriptions and capacities are taken from the Parish Council's consultation analysis. The issues listed for further assessment are evidential checks, not findings that a site is unsuitable.

Comparative evidence against the assessment criteria

The consultation report also contains a direct comparison of which sites performed most strongly against selected criteria. This is useful because it shows that the alternatives were not simply identified through public preference; the Parish Council's analysis considered planning-related factors too.

ASSESSMENT CRITERION	SITES IDENTIFIED IN THE REPORT AS THE STRONGEST	RELEVANCE TO THE INSPECTOR'S CONSIDERATION
Little or no flood risk	Cottage Lane Crowfoot Way Witham Villa Clump Hill	Supports a request for the flood-risk evidence for BA1 and the alternatives to be compared consistently
Limited traffic impact	Crowfoot Way Blockley Road Witham Villa	Supports comparison of access, junction capacity and likely traffic effects, using appropriate technical evidence.
Less environmental impact	Cottage Lane Blockley Road Clump Hill	Supports comparative assessment of landscape and environmental effects.
Access to amenities	Cottage Lane Witham Villa East of Frolesworth Road	Supports consideration of access to services and the need to travel by car.
Development deliverability	Crowfoot Way Cottage Lane Witham Villa	Supports further examination of availability, planning status, infrastructure requirements and delivery timescales.
Community preference	Cottage Lane	Provides evidence of local preference, while recognising that preference alone does not establish planning suitability or deliverability.

Housing capacity: an important qualification

The four preferred alternatives have the following figures in the report:

- Crowfoot Way: approximately 30–35 homes.
- Cottage Lane: approximately 250–260 homes.
- Blockley Road: 95 homes identified for the consultation.
- Witham Villa: approximately 125–138 homes.

Using the figures identified for consultation, these alternatives represent a combined indicative capacity of approximately 500–528 homes, compared with the 475 homes proposed at BA1. This is a calculation from the report's figures, not a confirmed deliverable supply.

There is an important caveat: the report describes Blockley Road as having a total site capacity of approximately 314 homes but says only 95 were identified for the consultation. The representation should therefore explain which capacity is being relied upon and why. The combined total should not be presented as a confirmed allocation or as proof that the housing requirement can be met without further assessment