



Harborough Local Plan (March 2025) Examination

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

Matter 7

**Locating Development in the Right
Places**

October 2026

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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 7 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 4 which addresses strategic policy issues relating to housing need, the requirement and spatial distribution of housing development.
- 1.1.3 This statement is limited to responding to questions posed under the following issues under Matter 3:
- Issue 2: Key Development Sites



2 Matter 7: Locating Development in the Right Place

2.1 Issue 2: Key Development Sites

Policies SA01, SA02, SA03, SA04, DS01 and DS02

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?

- 2.1.1 Yes, in relation to site ref: BA1 Land off Frolesworth Road, the allocation is soundly based. This is addressed in more detail below, supplementing the response submitted to the Council's Pre-Submission Regulation 19 consultation.

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.

i) What is the scale, and type/mix of uses proposed? Are they clear?

- 2.1.2 Policy SA01 includes site BA1: Land off Frolesworth Road, Broughton Astley. The required use is "housing". The site is allocated for 475 homes.
- 2.1.3 As discussed in more detail below, and also commented upon in our Matter 3 Statement, IM Land is seeking modifications to the Local Plan that increase the number of homes allocated to the Site – and by extension, to Broughton Astley/the Large Villages. For the Site, this should reflect the increased capacity of 550 homes proposed in the planning application (ref: 26/00480/OUT) submitted by IM Land in March 2026.
- 2.1.4 In addition to seeking outline planning permission (all matters reserved except for means of site access) for up to 550 dwellings, the development proposals include:
- land for primary school expansion (identified in NF-NLP 2; page 39)
 - land for a community facility
 - land for expansion of the adjoining cemetery
 - green and blue infrastructure.

- 2.1.5 If required for soundness, these additional uses could also be identified in Policy SA01.

- 2.1.6 In addition to the above on-site provision of infrastructure, IM Land anticipate that it will contribute towards off-site infrastructure to mitigate the impacts of the development proposed. Through the planning application process, IM Land is continuing to engage with the Council to seek agreement to the mitigation and associated costs.

ii) What is the basis for this mix, and is it justified?

- 2.1.7 As above, the Local Plan currently proposes the single land use of housing development. This is the principal land use to be delivered through the development of the BA1 allocation at Frolesworth Road, Broughton Astley.
- 2.1.8 Subject to modifications that increase the capacity of the Site to 550 homes, IM Land considers SA01 to be sound.



iii) What is the current planning status of the site in terms of planning applications, planning permissions and construction?

- 2.1.9 As stated above, the Site is subject to an outline planning application (all matters reserved except means of site access) submitted to the Council in March 2026. At the time of writing, IM Land is working positively and constructively with the Council and targeting the application being determined in early 2027.

On this basis, the proposed trajectory at Appendix 5 which anticipates first completions in 2030/3031 is considered realistic and achievable. The rate of delivery is also considered realistic albeit with a higher number of homes (550) expected to be delivered.

iv) What are the benefits that the proposed development would bring?

- 2.1.10 The development of allocation BA1 Land off Frolesworth Road will make a significant contribution towards the delivery of new market and affordable housing within the district. This is a benefit that should attract substantial weight.
- 2.1.11 The allocation of a larger site at Broughton Astley will secure the delivery of up to 220 affordable homes (40% of the total number of homes proposed).
- 2.1.12 The development is also able to support the delivery of supporting infrastructure to meet identified needs and mitigate the impacts of the development. As above, this includes providing land to expand the existing Orchard CoE Primary School; land to expand the existing cemetery adjoining the site; land for a new community facility (subject to a demonstrable need and details to be agreed with the Council); publicly accessible open space; and biodiversity net gain.
- 2.1.13 The development proposals also offer the potential for betterment that will reduce flood risk elsewhere. This can be achieved through improved surface water management and a reduction in surface water runoff rates. This is consistent with emerging policy DM08 and the Section 18 of the NPPF (2026) which are material considerations for the planning application.
- 2.1.14 The development proposals, guided by a comprehensive masterplan submitted with the planning application, will secure high-quality development that accords with relevant development plan policies and Policy DP3 of the NPPF (2026). This should attract substantial positive weight as a benefit of the proposals for the site.

v) How does the site relate to nearby uses? What is the potential adverse impact of developing the site, for example in terms of transport/traffic, pollution, nature conservation, landscape and impact on heritage assets? How have these been considered and how could they be mitigated?

- 2.1.15 The site immediately adjoins the south-western edge of Broughton Astley. The edge of settlement in this location is characterised by existing residential development along Six Acres, Glebe Road, Blenheim Crescent, and Gorham Rose. The existing Orchard CoE Primary School is also located on this edge of Broughton Astley, offering the potential for the Site to include land to expand the school to 2 forms of entry, as proposed in the planning application (see above).
- 2.1.16 Like all proposed allocations for housing included in the Local Plan, the potential adverse impacts of developing the sites have been assessed through an adequate and proportionate evidence base that satisfies the requirements of the NPPF (paragraph 32).
- 2.1.17 In relation to the Site, the planning application is supported by a more detailed range of surveys and assessments. We acknowledge that the details submitted with the planning application, and their consideration by the Council and consultees, sits largely outside the remit of the examination of the Local Plan. However, where it may be helpful to the Inspectors, we have referred to updates via the application which help respond to specific questions below.



vi) How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

- 2.1.18 The Local Plan is supported by a SFRA Level 1 (EN-NLP6), SFRA Level 2 (EN-NLP7), and SFRA Level 2 Addendum (EN-NLP8).
- 2.1.19 The Site has been the subject to an appropriate and proportionate assessment through the Council's evidence base. It has been demonstrated that the site is at low risk of flooding and therefore it is considered that the proposed allocation of the Site accords with paragraph 170-174 of the NPPF (2024).
- 2.1.20 In addition, through the planning application process, no significant issues have been raised by the Council and relevant consultees with regards to flood risk and drainage.

viii) How have the wider transport implications of the proposed development been considered?

- 2.1.21 The Council's evidence base for Transport includes the Harborough Strategic Transport Impact Assessment (STIA) dated January 2025 (TRP-NLP2) which provides an appropriate and proportionate assessment of the wider transport implications of the proposed development of the Site and planned growth in the Local Plan.
- 2.1.22 Land off Frolesworth Road, Broughton Astley (site ref: 10554) is assessed in the STIA. Pages 331-340 in Appendix F of the STIA reviews the Site and demonstrates that the site is suitable for the development proposed and that the potential impacts are capable of being mitigated.
- 2.1.23 Table 6.1 of the STIA includes a cost estimate of £4,365,000 for indicative highway mitigation cost, public transport mitigation cost, walking and cycling mitigation cost, and travel planning costs.
- 2.1.24 The planning application for the Site includes a Transport Assessment and an TA Addendum was submitted in August 2026. The consideration of the planning application, which is following a standard process with the highway authorities, does not raise any issues relevant to the examination of the Local Plan.

ix) What are the infrastructure requirements/costs? How would these be addressed and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development? Are there physical or other constraints to development?

- 2.1.25 The most relevant evidence base is contained in the Council's Infrastructure Delivery Plan dated March 2026 (INF-NLP2) and the STIA (TRP-NLP2). Taken together, these reports provide an appropriate and proportionate evidence base to identify the likely scale of infrastructure requirements and costs to support development.
- 2.1.26 Through the planning application, Leicestershire County Council (LCC) has confirmed the contributions it is seeking through a s106 Agreement.
- 2.1.27 IM Land confirm that the infrastructure costs that have been identified thus far are considered to meet the relevant tests for planning obligations.
- 2.1.28 As set out in IM Land's response to the Pre-Submission Regulation 19 consultation; its hearing statements; and the Local Plan evidence base, there are no physical or other constraints to the development of the site for new housing.

x) Is the site available, realistically viable and deliverable? What is the expected timescale, output, rate of development and is this realistic? Does the site fall within a Mineral Safeguarding Area, if so, how would this impact on the site's deliverability?



2.1.29 Yes, IM Land confirm that the site is available, viable and deliverable. Subject to planning permission being granted by mid/late 2027, the phased delivery shown in Appendix 5 of the Local Plan is considered realistic.

2.1.30 The Site does not fall within a Mineral Safeguarding Area.

xj) Is the boundary of the site appropriate? Is there any justification for amending the boundary, where appropriate?

2.1.31 IM Land consider the boundary of the site allocation to be appropriate.

xii) Are there any MMs required for the Plan to be found sound?

2.1.32 Yes. Please see above and our statement for Matter 3.

2.2 Large Villages: Broughton Astley and Site BA1 Land off Frolesworth Road

Site BA1: Land off Frolesworth Road (475 homes) Policy SA01

1. Is there sufficient community infrastructure within Broughton Astley to support the addition of a further 475 homes? If not, how could the impact of the increase in population be mitigated?

2.2.1 The impacts on existing infrastructure arising from the development have been assessed, through the evidence base supporting the Local Plan, and through the planning application process.

2.2.2 The Local Plan evidence base demonstrates that the impacts on infrastructure can be mitigated.

2. Would there be any impact from the development on the operation of the nearby cricket ground?

2.2.3 No. In responding to the planning application, Sport England (who have obtained input from the English Cricket Board) have confirmed that the development of the site as proposed is acceptable. A copy of Sport England's response is provided at Appendix 1.

3. Could the highways impact of the proposed development be adequately alleviated?

2.2.4 Yes. Please see comments above.

4. Is the wording of the policy effective? How would the provision of a Heritage Impact Assessment impact on the determination of a planning application on the site?

2.2.5 Yes, the wording is considered to be effective (subject to issues identified elsewhere in our hearing statements).

2.2.6 IM Land consider this requirement in criterion 9 for a Heritage Impact Assessment to be submitted as part of the requirements for a planning application is a proportionate response to the need for the masterplanning of the site to have regard to identified heritage assets. It has been demonstrated that identified heritage assets are not a constraint to the site being developed.

2.2.7 Through the planning application, the Council's conservation officer has concluded that the proposal would result in less than substantial harm to heritage assets, to be weighed against the benefits of the proposal.

4. What is the status of the wildlife site referenced in criterion 6?



- 2.2.8 The “Potential Local Wildlife Site” referred to in criterion 6 is located in the western part of the Site. This has been assessed and incorporated into the development proposals in the planning application submitted by IM Land (as referred to above). The Ecological Appraisal submitted with the application states:

“Although this pond has been identified as a ‘potential historical Local Wildlife Site’, the desk study notes that due to the time passed since it was last surveyed, it is ‘not known if the site still has value’. There is no specific data provided pertaining to why this pond was originally designated however given the lack of species diversity and that the pond does not hold water throughout the entirety of the year, it is considered to be of Less than Local importance. Due to this and that this pond is unlikely to support any rare species, given that it dries frequently, and does not represent a scarce pond type, it is not considered to be a Priority Habitat.”

- 2.2.9 In conclusion, whilst IM Land have no objection to the inclusion of criterion 6, the apparent limited importance of this feature could call into question whether explicit reference in Policy SA01 is consistent with national policy.

5. Are there any further existing operations nearby which may be impacted by the proposed development? If so, how will the agent of change principle be followed?

- 2.2.10 The potential development of an Anaerobic Digester located approximately 750m to the west of the Site that has planning permission (Sutton Lodge Farm (planning reference 2025/VOCM/0028/LCC) is assessed through an Odour Assessment submitted with the planning application for Land off Frolesworth Road. In summary, the assessment identifies that:

“An odour risk assessment has been undertaken, which assumes a robust scenario whereby no account of any mitigation measures implemented as part of the planning approval for the [Anaerobic] Digester have been included. The risk assessment indicates that with a low risk of odour impacts combined with high receptor sensitivity, there is considered to be the potential for a ‘Slight Adverse’ odour effect. If the proposed mitigation measures at the Digester are taken into consideration then the odour risk would reduce and would indicate that with a negligible risk of odour impacts combined with high receptor sensitivity, there would likely be a ‘negligible’ odour effect.”

- 2.2.11 The odour effects of the potential future Digester facility is not a constraint to the development of the Site.



Appendix 1



Harborough District Council
FAO: Mrs Ruth Meddows-Smith
By email only

30 April 2026

**Town & Country Planning (Development Management Procedure) (England)
Order 2015**

Application No: 26/00480/OUT

Site: Land at Frolesworth Road, Broughton Astley

Proposal: Outline planning application for residential development of up to 550 dwellings with all matters reserved except means of site access, land for a primary school expansion, land for a Community Facility, Cemetery expansion and car parking, land for Recreational Ground expansion, public open space, associated ancillary works and enabling works and demolition of existing structures.

Sport England Reference: PA/26/EM/HB/73639

Thank you for consulting Sport England on the above application.

Sport England – statutory consultee role and policy

The proposal would affect playing field and so the planning application for development in the form set out does require statutory consultation with Sport England under the terms of the above Order.

We have therefore assessed the proposal in light of the National Planning Policy Framework (NPPF), in particular paragraph 104, and Sport England's Playing Fields Policy, which is presented within our 'Playing Fields Policy and Guidance Document':

www.sportengland.org/playingfieldspolicy

Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field land remains undeveloped, or
- land allocated for use as a playing field

unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.

The proposal and impact on playing field

The application site bounds Frolesworth Road Recreation Ground with the site forming three of the Recreation Ground's boundaries. Frolesworth Road contains

playing pitches including a cricket pitch. Submitted in outline format, with all matters reserved except access, the planning application submission is accompanied by Indicative Layouts and a parameters plan. Sited adjacent to playing field the proposed residential scheme could prejudice the use of the playing field.

Sport England has sought the view of the England and Wales Cricket Board (ECB) on the planning application submission.

Assessment against Sport England's Playing Fields Policy and NPPF

The application site lies adjacent to the playing field at Froleworth Road. The site is used by Broughton Astley Cricket Club. The siting of residential development in this area has the potential to have a prejudicial impact on the use of this playing field. Paragraph 200 of the NPPF requires that new development should be integrated effectively with existing businesses and community facilities such as sports clubs. It further goes on to state that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.

Sport England has raised concerns about the proposed allocation of this site for housing in Harborough's Regulation 19 Local Plan consultation – site allocation ref: BA1 (Land off Frolesworth Road).

The Parameter Plan 01 Land Use (Drw No: BM-M-15 Rev C) does show a proposed area for formal sports and recreation to the west of the existing playing field and an area of green infrastructure to the south. The ECB has commented that the playing field should be extended to the west as shown. The cricket boundary at the existing ground is not a large one (approximately 45 metres) and as such there should be an awareness of potential ball strike from the existing cricket ground to the proposed playing field which should be factored in when determining any usage agreements or activity planned on the new playing field.

The ECB further comments that the applicant should engage and collaborate with the ECB and Leicestershire Cricket Foundation to support the development of the proposed extension to the Recreation Ground. The applicant should engage specialist consultants to conduct a feasibility study on the land to see if it is suitable for the pitches indicated on the Illustrative Masterplan which shows a cricket pitch, a football pitch and a further pitch marked out on this area of new playing field.

The application is submitted in outline format with all matters reserved except for access. In order to ensure that the proposed development scheme does not have a prejudicial impact on the existing playing field, as detailed above, there is a need for the Land Use Parameters Plan to form part of the outline consent (if the Council is minded to grant planning permission).

Sport England's Position

Given the above, provided the development scheme proceeds in accordance with the Parameters Plan 01 Land Use (Drw No: IBM-M-15 Rev C) which designates the land to the west of Froleworth Road Recreation Ground as an area of Formal Sports and Recreation and the land to the south of the Recreation Ground as Green Infrastructure then the proposal should comply with exception 3 of our Playing Fields Policy and paragraphs 104 and 200 of the NPPF (2024) in that the proposed development would not prejudice the use of any of the playing pitches on the existing playing field site. If this Land Use Plan forms part of the planning conditions attached to the decision notice (if the Council is minded to approve planning permission) and the development proceeds in accordance with this plan then Sport England would have **no objections** to the proposal.

The following condition should also be attached to ensure that the new playing field is prepared to a good standard and fit for purpose:

Condition: Prior to the commencement of works to construct the playing field (formal sport and recreation area) the following documents shall be submitted to and approved in writing by the Local Planning Authority:

- (i) A detailed assessment of ground conditions (including drainage and topography) of the land proposed for the playing field which identifies constraints which could adversely affect playing field quality; and
- (ii) Where the results of the assessment to be carried out pursuant to (i) above identify constraints which could adversely affect playing field quality, a detailed scheme to address any such constraints.

The scheme shall include a written specification of the proposed soil structure, proposed drainage, cultivation and other operations associated with grass and sports turf establishment and a programme of implementation. The submitted documents should take into account the findings and recommendations of an Agronomy Report.

The approved scheme shall be carried out in full and in accordance with the approved programme of implementation. The land shall thereafter be maintained in accordance with the scheme and made available for playing field use in accordance with the scheme.

Reason: To ensure that the playing field is prepared to a good standard and is fit for purpose.

Yours sincerely,

Sharron Wilkinson, MRPTI,
Planning Manager