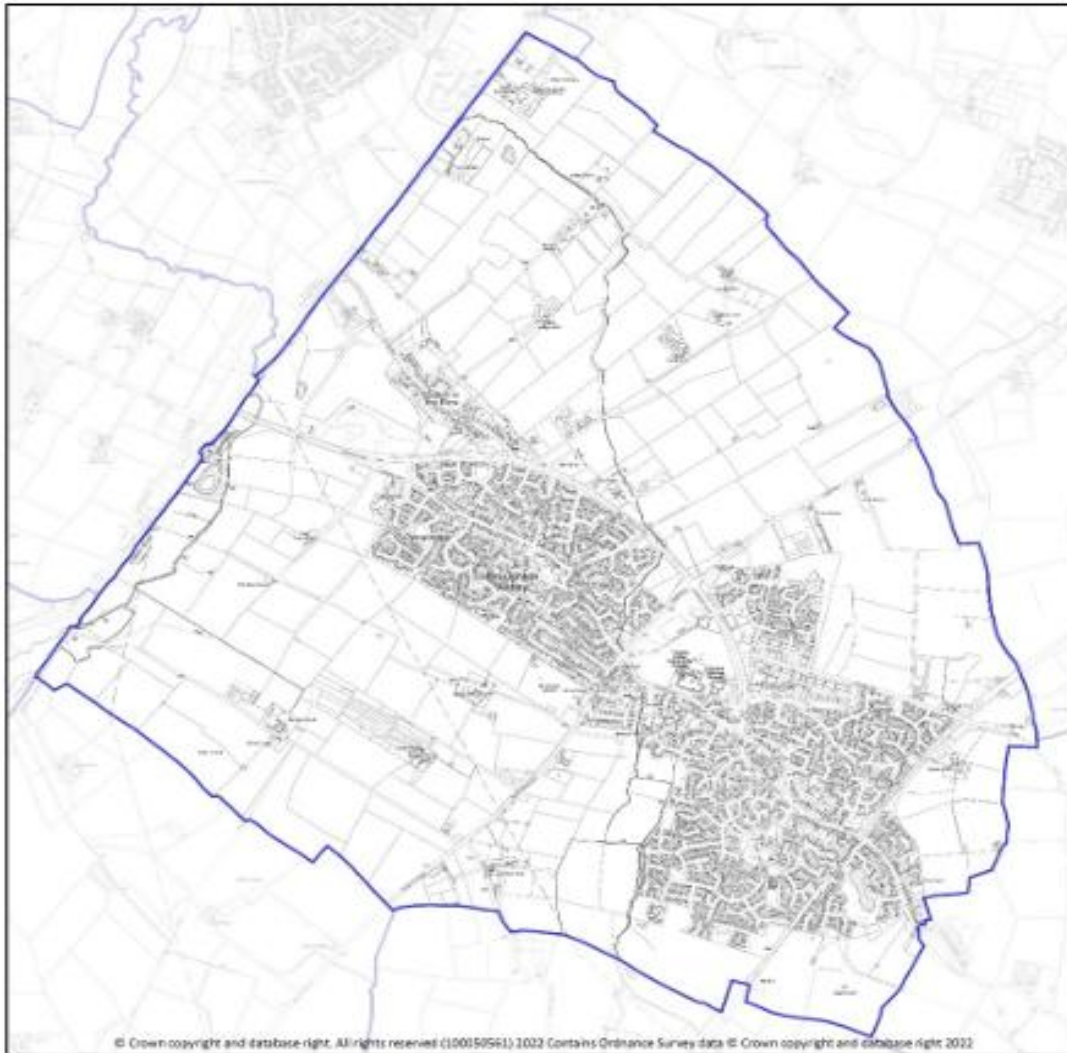




Broughton Astley Neighbourhood Plan

Consultation Statement



Prepared March 2026



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1. Introduction

1.1 This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the review of Broughton Astley Neighbourhood Plan (BANP). The legal basis of this Statement is provided by Section 15(2) of Part 5 of the Regulations, which requires that a Consultation Statement should:

- Contain details of the persons and bodies who were consulted about the proposed Neighbourhood Development Plan.
- Explains how they were consulted.
- Summarise the main issues and concerns raised by the persons consulted.
- Describes how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Plan.

a. To satisfy these requirements, this Statement first describes the local engagement activities undertaken during the review of Broughton Astley NHP up to the launch of the formal Regulation 14 Pre-submission consultation. Following this consultation, it will then cover in more detail the process undertaken for the Regulation 14 consultation, the feedback received, and the action taken.



2. Local Engagement and Consultation Activities

2.1 The review of **Broughton Astley Neighbourhood Plan 2013-2028** was to be undertaken by the Neighbourhood Plan Delivery and Monitoring Group (NPD&M Group) which is appointed each year by the Parish Council. The group was tasked with undertaking a review and replacement of the original plan considering changes in national planning policy and the Harborough District Local Plan which was also being reviewed. The review plans to extend the validity of the made Neighbourhood Plan to 2041.

2.2 The NPD&M Group held meetings on the following dates:

MEETING DATES

2022	2023	2024	2025	2026
9 March	25 January	9 January	18 February	21 January
28 April	31 July	6 February	11 March	11 February
5 May	18 August	14 March	5 June	26 March
9 June	20 November	8 July	13 June	
28 July	14 December	11 July	7 October	
12 December		8 August	28 October	
		14 November	13 November	

The agendas and minutes are published on the Parish Council's website and have been shared with and ratified by all members of the Parish Council. Guidance and advice were also obtained by the appointment of a Neighbourhood Plan Consultant.

2.3 Working alongside the NHP Consultant, the Group commissioned the update of evidence base documents and drafted proposed modifications [**See Statement of Modification attached in APPENDIX A**] to the existing NHP policies in line with changed local circumstances and revised higher level planning policies. A pre-submission version of the NHP was created as a result. [[pre-submission-draft-nhp.pdf](#)]

2.4 The NPD&M Group planned to deliver four public display and information days for members of the public to consider various development site options for inclusion within the Plan. These events were held on 26 August, 8 September, 20 September and 24 September 2025 in Broughton Astley Village Hall. The events were advertised by a leaflet drop to households in Broughton Astley, posted on the Parish Council's website, noticeboards and Social Media platforms.

2.5 The consultation analysis for the public consultation on the potential site options is included in **APPENDIX B**.





Broughton Astley

Neighbourhood Plan

[Your Village – Your Choice](#)

PUBLIC CONSULTATION ON DEVELOPMENT SITES

IN BROUGHTON ASTLEY

DROP-IN SESSIONS AT THE VILLAGE HALL

TUESDAY 26th AUG 2PM – 7PM
MONDAY 8th SEPT 3PM – 8PM
SATURDAY 20th SEPT 10AM – 4PM
WEDNESDAY 24th SEPT 3PM – 8PM



Minimum allocation from Harborough District Council is 475 dwellings in Broughton Astley. This is your opportunity to have your say on where these should be.

For more information or an alternative way to submit comments please go to www.broughton-astley.gov.uk

Broughton Astley NHP Review Community Engagement Event – Advertising Leaflet

Over the four open days held over 250 village residents attended with members of the NPD&M Group in attendance at each event to respond to queries and answer questions. Display boards were erected with information, maps and copies of the draft NHP, and various studies and Evidence Base reports [flooding, site assessment, design, traffic etc] were available to view.



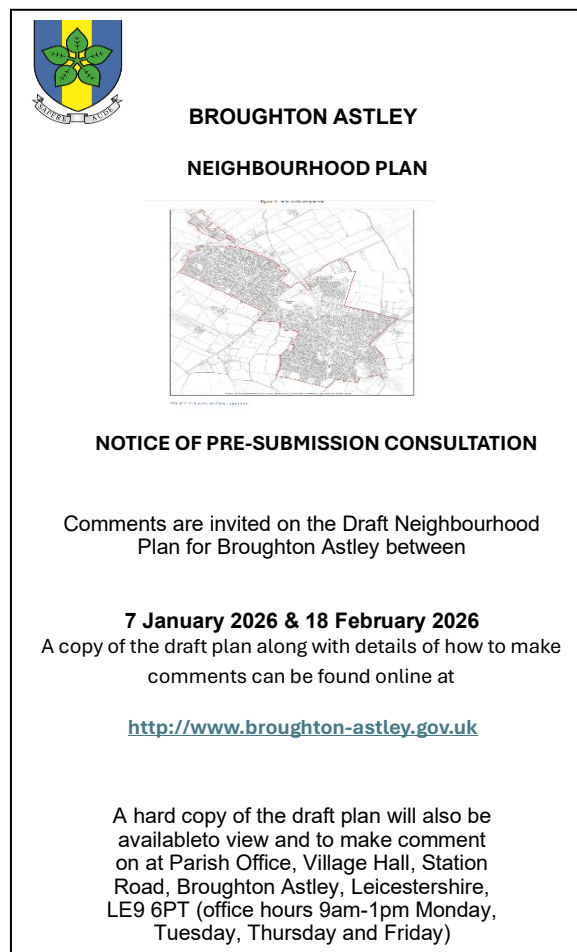
Images taken from one of the consultation events



3. Regulation 14 Consultation Preparations

3.1 Pre-Submission Consultation Preparation. The NPD&M Group worked closely with their appointed Neighbourhood Plan Consultant to ensure that the pre-submission version of the NHP and all the supporting Evidence Base reports would be available to all Broughton Astley residents, others with an interest in the Parish and external statutory bodies ahead of the planned Regulation 14 Consultation launch. Copies of the document sets were made available at the following:

- The Parish Office, located in the village hall.
 - The Parish Council website (digital version)
- a. The launch of the Regulation 14 Consultation was notified by a poster, issued by Broughton Astley Parish Council, on all 15 noticeboards within the Parish, a letter or email sent to all statutory bodies, local Parish Councils and others with an interest in the Parish and was displayed on the Parish Council website.



Notice of pre-submission consultation – Advertising leaflet



b. Consultation – list of people and bodies consulted

A letter was sent by post, email or hand delivered to all Regulation 14 consultation bodies on 19 November 2025. They were:

Leicestershire County Council
Harborough District Council
Dunton Bassett Parish Council
Leire Parish Council
Frolesworth Parish Meeting
Cosby Parish Council
Croft Parish Council
The Coal Authority
Homes England
Natural England
Environment Agency
Historic England
Network Rail Infrastructure Ltd
Highways Agency
British Telecommunications
East Leicestershire and Rutland CCG
National Grid
British Gas Properties
Severn Trent Water
Anglian Water
Voluntary Action Leicestershire
Age UK Leicestershire and Rutland
Campaign for the Protection of Rural England
Leicestershire Ethnic Minority Partnership
Federation of Gypsy Liaison Groups
Interfaith Forum of Leicestershire
St Mary's Church
Sutton in the Elms Baptist Church
Market Harborough Chamber of Commerce
Leicestershire Centre for Integrated Living
Harborough District Disability Access Group
Leicestershire Police, Force Headquarters
Leicestershire Fire and Rescue
Platform Housing
Alberto Costa MP
Cllr Piper, LCC
Cllr Dann District Councillor
Cllr Grafton-Reed District Councillor
Cllr Worrell District Councillor
Cllr Graves District Councillor
The Bull Public House
The White Horse Public House
George and Dragon Public House
The Royal Public House
The Red Admiral Public House
Broughton Astley Leisure Centre
Broughton Veterinary Group
Aldi Store



Co-op Store
Spar
Estley Stores (Londis)
MACE (Broughton Astley Post Office)
Akshar Express
Screwfix
Howdens
Multicell International Ltd
Phil Holden Fasteners Ltd
Pinnacle International Freight Ltd
Corner House Garage
Cameo Services HQ
WRM Construction
Blackrow Group (Midlands)
Luxheat Ltd
Ram Universal
UK Flooring Supplies Online
Broughton Astley MOT Centre
Axiom Design Resource Ltd
TBS Associates
Combined Shipping Company Ltd
Batteries Direct Golf
Broughton Astley Volunteer Group
Rural Community Council
Broughton Alive
Broughton Astley Scout Group
Girlguiding Broughton Astley
Sea Cadets Broughton Astley
Marrons
Davidsons Developments Ltd
Stantec
Avison Young
Pegasus Group
Jelson Ltd
Lagan Homes
Bidwells



Dear Stakeholder

Broughton Astley Draft Neighbourhood Plan Review

Statutory Consultation period 21.11.25 – 16.01.26

Please find below a new link to the consultation documentation relating to the above. We have experienced some issues with the previous link issued and are sending this to you to enable completion of the consultation as detailed in an earlier email sent w/c 17 November 2025.

Comments on the Draft Neighbourhood Plan Review can be made by using the Pre-Submission Comments Form at: [Neighbourhood Plan Review | Broughton Astley Parish Council](#)

All responses received by **9am on Monday 16 January 2026** will be considered and may be utilised to amend the Draft Neighbourhood Plan Review.

Wherever possible, please ensure that you specify the policy or paragraph to which your response relates.

Details of the process we have undertaken, and all relevant documentation is accessible on the Broughton Astley Parish Council website: [Neighbourhood Plan Review | Broughton Astley Parish Council](#)

We look forward to hearing from you.

Yours sincerely,

Debbie Barber

Debbie Barber
Parish Manager and
Clerk to the Council

Copy of email / letter sent to stakeholders

NB: The consultation period was extended to end on Wednesday 18 February following a reported issue with the distribution of the electronic consultation invitations.



c. Regulation 14 - Public Open Event

An open event was arranged for members of the public to attend on Saturday 10 January 2026 between the hours of 10am and 4pm and members of the NPD&M Group were on hand throughout the day to engage with the attendees and answer any questions or enquiries they may have. Information boards were displayed in the Village Hall which provided the details and justifications to the policy changes for inclusion in the Plan. Seventy-one residents were recorded visiting the consultation event and comments made were collated for consideration.



Broughton Astley Neighbourhood Plan

[Your Village ~ Your Choice](#)

REGULATION 14 - PUBLIC CONSULTATION

DROP-IN SESSION AT THE VILLAGE HALL

SATURDAY 10TH JANUARY 2026 10AM - 4PM

Have your say on the Pre-Submission Neighbourhood Plan

For more information or an alternative way to submit your comments go to
www.broughton-astley.gov.uk

Notice of Regulation 14 Public Consultation



4. Summary of findings from events and questionnaires

By involving residents, business owners and other stakeholders in the development of the Plan, it is both evidence-based and has been shaped by local opinion, with policies being tested as they were developed. There has been detailed analysis after each consultation event or questionnaire which has informed the next step of drafting the plan.

Public Consultation – Housing Site Options

A public consultation was conducted both online and through in person drop-in sessions between 26 August and 24 September 2025. The purpose of this engagement was to adopt a proactive and inclusive approach to identifying potential locations for residential development within the parish, reflecting the preferences and insights of residents.

The following reports can be found on the Parish Council website:

- Area of Development – Statement
- Report on Potential Housing Site Allocations from Public Consultation

[Neighbourhood Plan Site Allocation Consultation | Broughton Astley Parish Council](#)

Regulation 14, Pre-Submission Consultation

This took place over a twelve-week period, initially set from 21 November 2025 to 18 February 2026. The comments received were collated and, after an initial review by YourLocale, the NHP Group was asked to consider the comments and possible amendments to the plan at its meeting on 26 March 2026. Once any amendments were agreed, the Draft Neighbourhood Plan was presented to the Parish Council for approval at its meeting held on Thursday 16 April 2026. The comments and responses are detailed in **APPENDIX C**.



5. Conclusion

The draft Neighbourhood Plan is now ready to be submitted to Harborough District Council which will publicise it for a further six weeks and then forward it, with accompanying documents and all representations made during the publicity, to an Independent Examiner who will review it and check that it meets the “basic conditions”. If the Plan successfully passes this stage, following any modifications, it will be put forward for a referendum.

The referendum question will be a straight “yes” or “no” on the entire Plan, as set out in the Neighbourhood Planning Regulations. People will not be able to vote for or against individual policies. If 50% or more of respondents vote for the Plan, it will be brought into force (“Made”) and become part of District-wide planning policy.

This Consultation Statement and the links to supporting documents are provided to comply with Section 15 (2) of Part 5 of the 2012 Neighbourhood Planning Regulations.



APPENDIX A

Broughton Astley Neighbourhood Plan Review November 2025 Consideration of Minor (non-material) / Major (material) updates to the Made Broughton Astley Neighbourhood Plan (January 2014)

1. Planning process

The Broughton Astley Neighbourhood Plan was formally 'Made' by Harborough District Council in January 2014. However, since this time, the Harborough Local Plan (April 2019) has been adopted, a new Local Plan is in preparation and there is a new National Planning Policy Framework (December 2024) in force and updates have been made to the Planning Practice Guidance.

These significant developments resulted in the Parish Council taking the decision to formally review the Neighbourhood Plan to ensure that it remains relevant and shapes development within the Parish up to 2041, the timescale for the emerging Harborough Local Plan.

The opportunity has been taken to refresh and update the approach taken in relation to residential allocations. The revised Neighbourhood Plan allocates a site for residential development in order to help meet its agreed minimum housing requirement for the Plan period and has revisited the settlement boundary. Some policies are new whilst others have a strengthened evidence base.

Most other provisions within the Neighbourhood Plan remain as they were in the version which passed referendum in 2014. We have sought to change only those policies that require updating in line with changed circumstances.

The process for reviewing the Neighbourhood Plan is set out in the Consultation Statement which will be included within the Submission material.

In addition to the Consultation Statement, the Neighbourhood Plan will be accompanied by:

- An updated Statement of Basic Conditions
- Housing Needs Assessment
- Design Guide and Codes
- Site Options Appraisal
- Environmental Inventory



- Local Green Space Evidence List
- Updated SEA determination/screening
- Updated Regulation 14 Consultation feedback and responses
- Responses to request for confirmation amongst Regulation 14 Consultees as to whether the amendments are considered material or non-material.
- Statement from the Qualifying Body about whether the amendments are considered material or non-material.

2. Planning Strategy

The timescale for the Made Broughton Astley Neighbourhood Plan was aligned to the then emerging, and since Adopted Harborough Local Plan (Adopted in April 2019) in reflecting a time period to 2031. The Review Neighbourhood Plan reflects the timescale for the emerging Local Plan (up to 2041).

The first Neighbourhood Plan took the opportunity to include a settlement boundary in order to control development over the Plan period and to reinforce the different approach to development within and outside of the red line boundary. This redline boundary is reinforced in this Review and updated.

3. Status of changes

Planning Practice Guidance, reviewed in 2024, introduces the following categories:

1. Minor (non-material) modifications to a neighbourhood plan or order are those which would not materially affect the policies in the plan or permission granted by the order. These may include correcting errors, such as a reference to a supporting document, and would not require examination or a referendum.
2. Material modifications which do not change the nature of the plan or order would require examination but not a referendum. This might, for example, entail the addition of a design code that builds on a pre-existing design policy, or the addition of a site or sites which, subject to the decision of the independent examiner, are not so significant or substantial as to change the nature of the plan.
3. Material modifications which do change the nature of the plan or order would require examination and a referendum. This might, for example, involve allocating significant



new sites for development. The changes made in the review of the Made Neighbourhood Plan are considered against these categories of modifications.

4. Neighbourhood Plan Policies

The following changes (other than planning policy updates and formatting amendments) have been made to the Neighbourhood Plan which was Made by Harborough District Council in January 2014. They are listed by reference to the Made 2014 Neighbourhood Plan policy numbers, except for new policies (not covered in the 2014 Made Plan), as indicated.

H1 - ALLOCATIONS POLICY is now Policy 1 Residential Site Allocation with a new allocation to meet the housing requirement set by the District Council as part of the Local plan Review.

H2 - AFFORDABLE HOUSING is now Policy 5 Affordable Housing which has been updated to reflect the recommendations of the Housing Needs Assessment (Appendix A).

H3 - WINDFALL AND BACKLAND DEVELOPMENTS is now Policy 3 Windfall Housing and has been updated to reflect current circumstances.

S1 - SHOPPING is now Policy 7 Broughton Astley Village Centre and has been updated to reflect current circumstances.

E1 - EMPLOYMENT is now Policy 9 Employment and Business development and has been updated based on recently gathered evidence.

T1 - TRANSPORT AND TRAFFIC MANAGEMENT is now Policy 13 Traffic Management and has been updated to reflect current circumstances.

L1 – IMPROVED LEISURE FACILITIES has been replaced by Policy 19 Infrastructure which identifies the priorities for future infrastructure requirements.

W1 – IMPROVED HEALTHCARE FACILITIES is now Policy 18 Community Hub.

EH1 - ENVIRONMENT – HERITAGE AND OPEN SPACE FOR PROTECTION is replaced by policies 20 and 21 and has been updated to reflect further evidence of locally important sites.

EH2 - AREA OF SEPARATION (AoS) is now policy 24 and includes an increased boundary for the AoS at Sutton in the Elms and an additional AoS between Broughton Astley and



Dunton Bassett in line with the Areas of Separation Study (2024) prepared as part of the evidence base for the Regulation 19 Local Plan.

SD1 - PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT has been deleted as it offers only a general statement of intent.

CI1 COMMUNITY INFRASTRUCTURE has been replaced by Policy 19 Infrastructure which provides an updated list of priorities.

P1 - PHASING OF DEVELOPMENT POLICY related to the site allocations in the Made Neighbourhood Plan and has been deleted along with the policies detailing specific allocation requirements.

In addition, some new policies have been introduced to the Neighbourhood Plan review as follows:

Policy 2 LIMITS TO DEVELOPMENT establishes the development boundary for Broughton Astley.

Policy 4 HOUSING MIX reflects the findings from the Housing Needs Assessment (Appendix A)

Policy 8 VILLAGE CENTRE PARKING establishes the parking standards for new residential development in the Village Centre. The parking standards themselves are the same as for the Made Neighbourhood Plan.

Policy 10: COTTAGE LANE INDUSTRIAL ESTATE AND ESTLEY GREEN BUSINESS PARK establishes the development requirements for this business park.

Policy 11: COVENTRY ROAD BUSINESS PARK establishes the development requirements for this business park.

Policy 12: RURAL BUSINESS sets the development requirements for rural businesses.

Policy 14: BROUGHTON WAY supports the creation of a new footpath.

Policy 15: ELECTRIC CAR CHARGING supports communal electric car charging facilities in the Neighbourhood Area.

Policy 16: SCHOOLS EXPANSION sets the criteria that needs to be in place for School expansion locally.



Policy 17: BROADBAND INFRASTRUCTURE establishes support for superfast broadband.

POLICY 22: SITES AND FEATURES OF NATURAL ENVIRONMENT SIGNIFICANCE identifies locally important environment sites locally

Policy 23: COUNTRYSIDE identifies the landscape character of the Neighbourhood Area.

Policy 25: Public Rights of Way network supports the protection and expansion of the footpath network.

POLICY 26: BIODIVERSITY AND HABITAT CONNECTIVITY identifies a wildlife corridor and protects biodiversity in the Neighbourhood Area.

Policy 27: TREES AND HEDGEROWS helps to protect existing trees and hedgerows.

POLICY 28: CLIMATE CHANGE AND FLOOD RISK sets conditions to be applied to development to help prevent flooding.

POLICY 29: SITES OF HISTORICAL ENVIRONMENT SIGNIFICANCE identifies locally important environment sites locally of historical significance.

POLICY 30 Non-Designated Heritage Assets confirms locally important buildings and structures for protection.

POLICY 31: RIDGE AND FURROW supports the protection of remaining ridge and furrow sites.

Note on the Nature of the Changes

Discussions took place in the Parish Council about the modifications in the Review of the Neighbourhood Plan and whether they represent Material or Non-Material changes to the Made Neighbourhood Plan.

The Qualifying Body considers that the Neighbourhood Plan Review contains modifications which change the nature of the Plan and will therefore require examination and a referendum.

6. How are these changes regarded by the Qualifying Body?

The Qualifying Body are fully supportive of the changes to the Made Neighbourhood Plan as described above.

Broughton Astley Parish Council, November 2025



APPENDIX B

Broughton Astley Parish Council

Analysis - Potential Housing Site Allocations from Public Consultations



Background

Since the adoption of the Broughton Astley Neighbourhood Plan in 2013, the village has seen significant housing development. The original Plan allocated two main sites and one reserve site, delivering around 500 new homes.

The Neighbourhood Plan is now being reviewed. As part of this process, new housing allocations must be considered to ensure the Plan remains up to date, meets the housing requirement figure for the Parish and reflects local needs.

At the same time, Harborough District Council is reviewing its Local Plan, which sets housing requirements for each settlement across the district. Once adopted, the Local Plan will take precedence over Neighbourhood Plan allocations, but we have an opportunity to put forward our preferred sites so that the housing requirement is met by allocations that are favoured locally.

Housing Allocation for Broughton Astley

Within their Local Plan, Harborough District Council has allocated **475 new homes** to Broughton Astley. These have been assigned to a single site on **land off Frolesworth Road**.

However, through the Neighbourhood Plan review, the Parish Council has taken a proactive approach. A comprehensive assessment of potential development sites has been carried out, identifying seven suitable alternative locations for residential development.

This means there are now **two potential approaches** to meeting the required housing number:

1. Accept the District Council's allocation of 475 homes on one site (Frolesworth Road),
or
2. Distribute the housing requirement across a combination of smaller sites identified locally.

Purpose of Report

The report presents a summary of resident feedback and key planning considerations to inform decision-making on the potential allocation of housing sites. The analysis is based on qualitative community input, planning policy alignment, and site-specific criteria across seven proposed development locations.

A total of **333 individuals attended** four public consultation events, 1,267 visited the consultation on the Parish Council website and **302 completed comment forms**. In addition, **four submissions** were received from agents or developers with direct interest in one or more of the proposed sites.



Site Assessments

Site 1: Broughton Chase – Crowfoot Way (Ref: 21/8045)

Summary:

Approximately 30 – 35 dwellings.

This site proposes a modest extension to an existing residential area with established infrastructure. It is perceived as having minimal environmental or community disruption and benefits from prior planning approval.

Key Strengths:

- Continuation of existing development
- No identified flood risk
- Minimal impact on village centre and services
- Existing school capacity nearby
- Prior planning approval enhances feasibility
- Limited traffic and environmental concerns
- Potential for short-term delivery





Site 2: Cottage Lane – Aldi Estate (Ref: 21/8144)

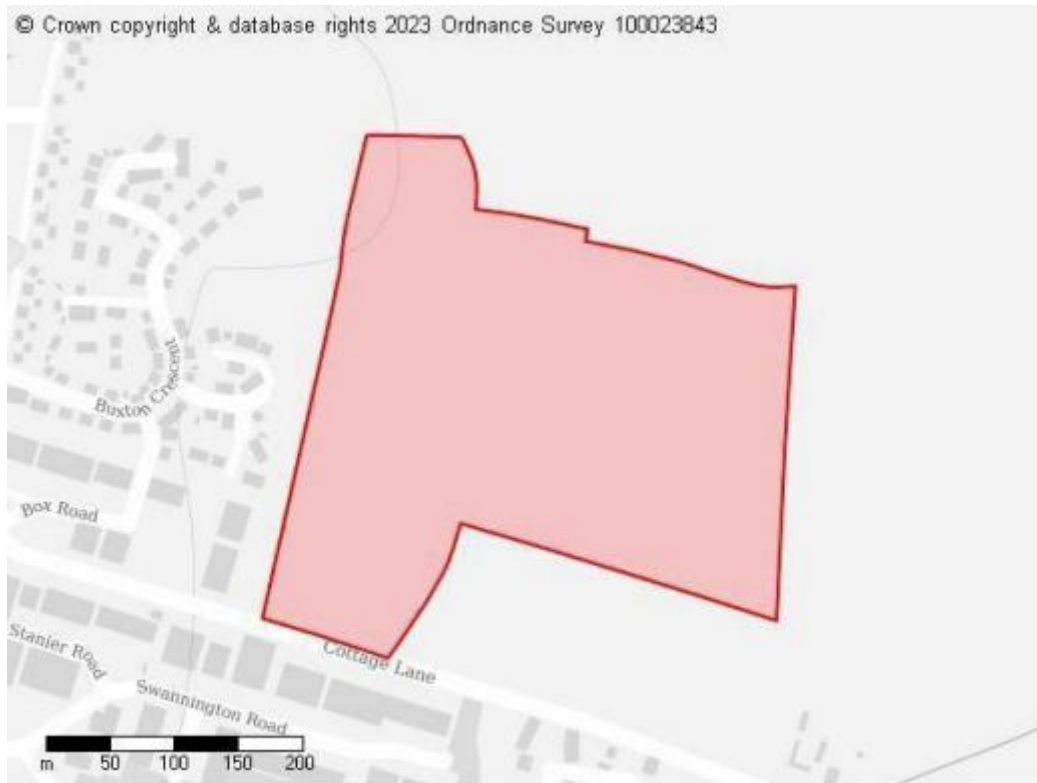
Summary:

Approximately 250 – 260 dwellings.

A strategically located site with strong links to local amenities and the bypass. It is adjacent to other sustainable developments and demonstrates high deliverability with limited landscape or infrastructure concerns.

Key Strengths:

- Adjacent to other sustainable developments
- Excellent access to retail and amenities (e.g., Aldi)
- No flood risk identified
- Limited traffic impact due to proximity to bypass
- Low agricultural land value
- Multi-access potential
- Deliverable in short term
- Minimal environmental and countryside impact





Site 3: Frolesworth Road – Recreation Ground Side (Ref: 24/10554)

Summary:

Approximately 475 dwellings.

An edge-of-settlement site preferred by some respondents for its lower impact and flexibility in delivery. Issues related to flood risk and road infrastructure will require resolution.

Key Strengths:

- Preferred by a few consultees for housing allocation
- No known flood risk
- Close to existing amenities (shops, schools)
- Reduced infrastructure and community disruption
- Located on settlement edge
- Potential for phased or split development
- Infrastructure enhancement possibilities





Site 4: East of Dunton Road – Blockley Road (Ref: 21/8248)

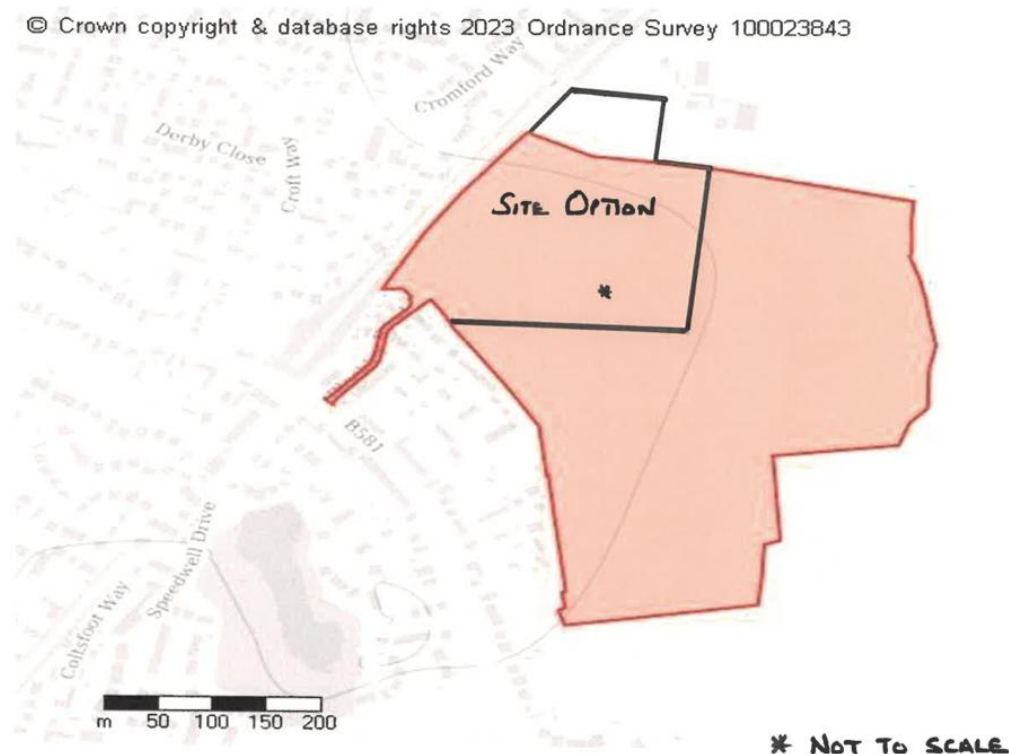
Summary:

Approximately 314 dwellings of which 95 identified for this consultation.

An infill location adjacent to existing housing with strong road connectivity. Generally regarded as a low-impact site with minimal disruption to the village centre.

Key Strengths:

- Adjacent to existing development
- Manageable or absent flood risk
- Strong highway connections
- Site currently under option
- Low environmental and visual impact
- Good deliverability and low disruption
- Close to schools and amenities





Site 5: Witham Villa (Ref: 24/10012)

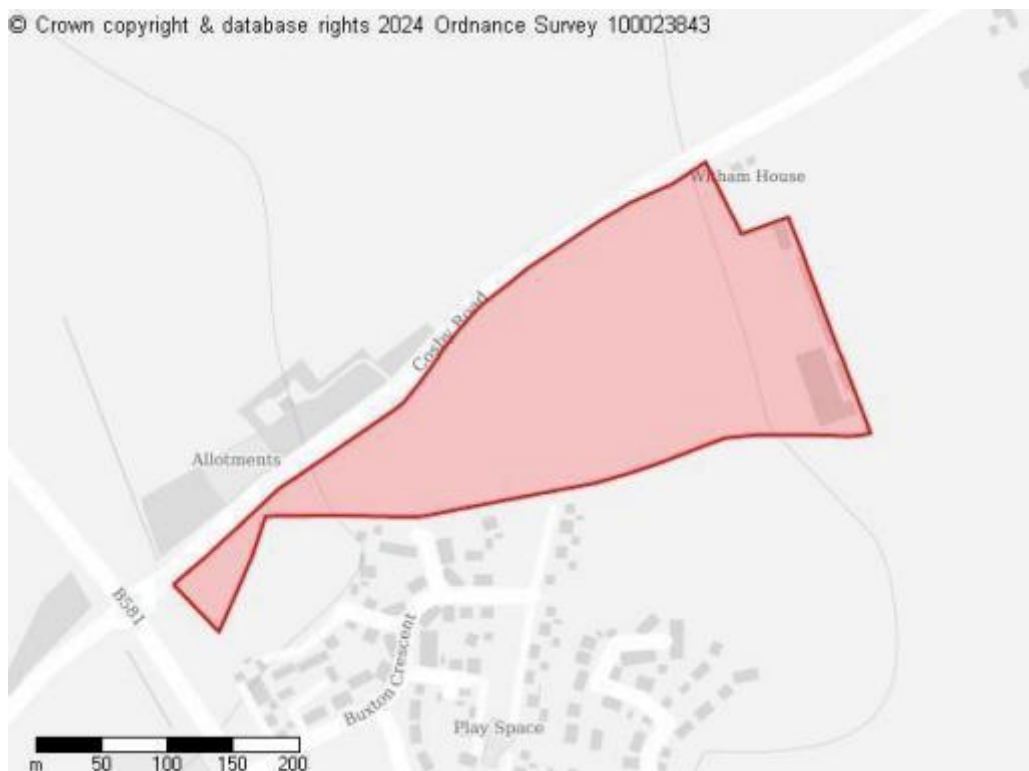
Summary:

Approximately 125 – 138 dwellings

Located near key facilities, this medium-sized site is adjacent to existing housing and is viewed as having minimal traffic and environmental impacts.

Key Strengths:

- Close proximity to Aldi, sports centre, and proposed medical centre
- Adjacent to existing estate
- Low traffic and infrastructure impact
- Medium-sized development footprint
- Good site access with no flood concerns
- Low landscape sensitivity
- Opportunities for multiple access points





Site 6: East of Frolesworth Road – opposite Recreation Ground (Ref: 21/8218)

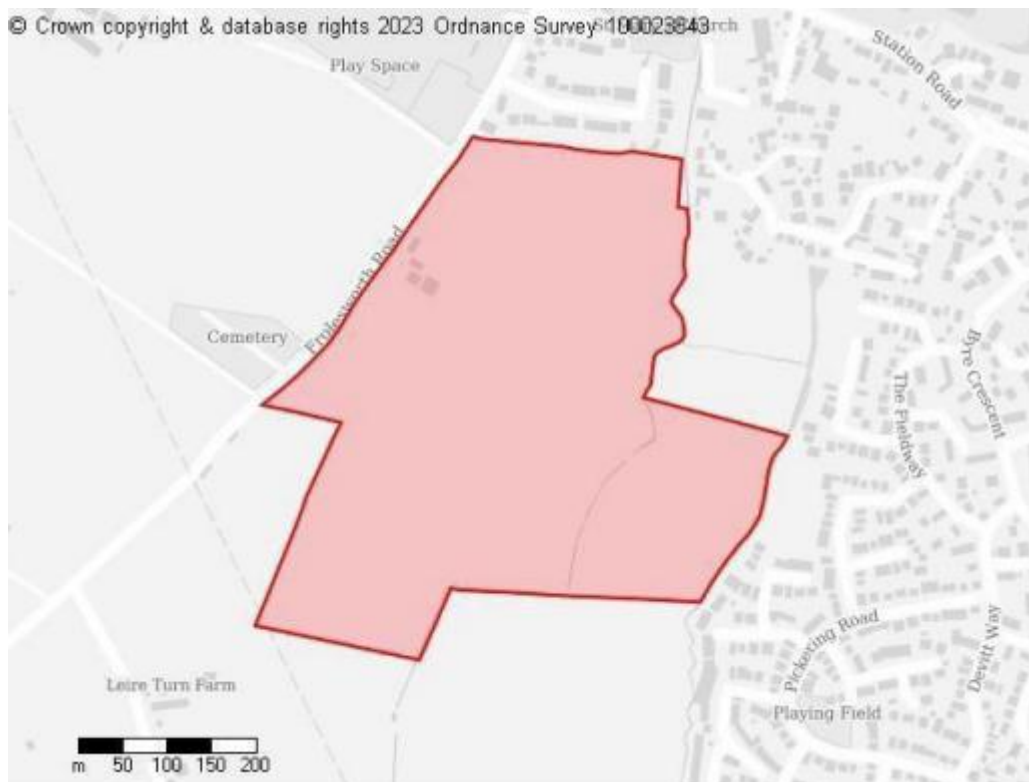
Summary:

Approximately 360 dwellings of which 150 identified in this consultation.

This is a sustainable infill site adjacent to current development. It is considered to have lower environmental impact and better walkability, although infrastructure and flood-related issues were noted.

Key Strengths:

- Near shops and amenities
- Fills a perceived 'gap' in the settlement
- Adjacent to existing residential development
- Sustainable and visually unobtrusive
- Reduced car dependency
- Builder-owned, supporting deliverability
- Potential for single-site development with limited disruption
- Access flexibility





Site 7: South Dunton Road – Clump Hill (Ref: 24/12209)

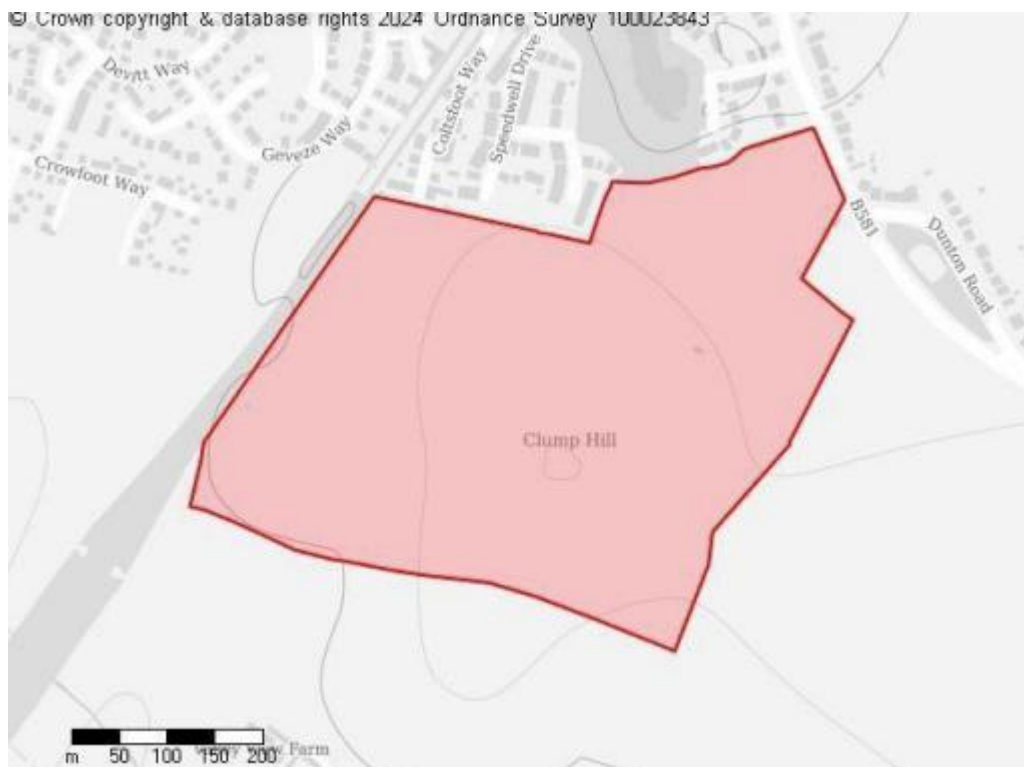
Summary:

Approximately 40 dwellings in Phase 1, 110 dwellings in Phase 2 and 125 dwellings in Phase 3.

Represents a southern expansion opportunity with scope for larger-scale and phased development. It is considered suitable for family housing and has manageable infrastructure impact. Many consultees supported only initial phases to protect Clump Hill.

Key Strengths:

- Suitable for family housing
- Adjacent to developed land
- No flooding issues reported
- Opportunity for phased delivery
- Minimal traffic and central village impact
- Higher capacity due to site size



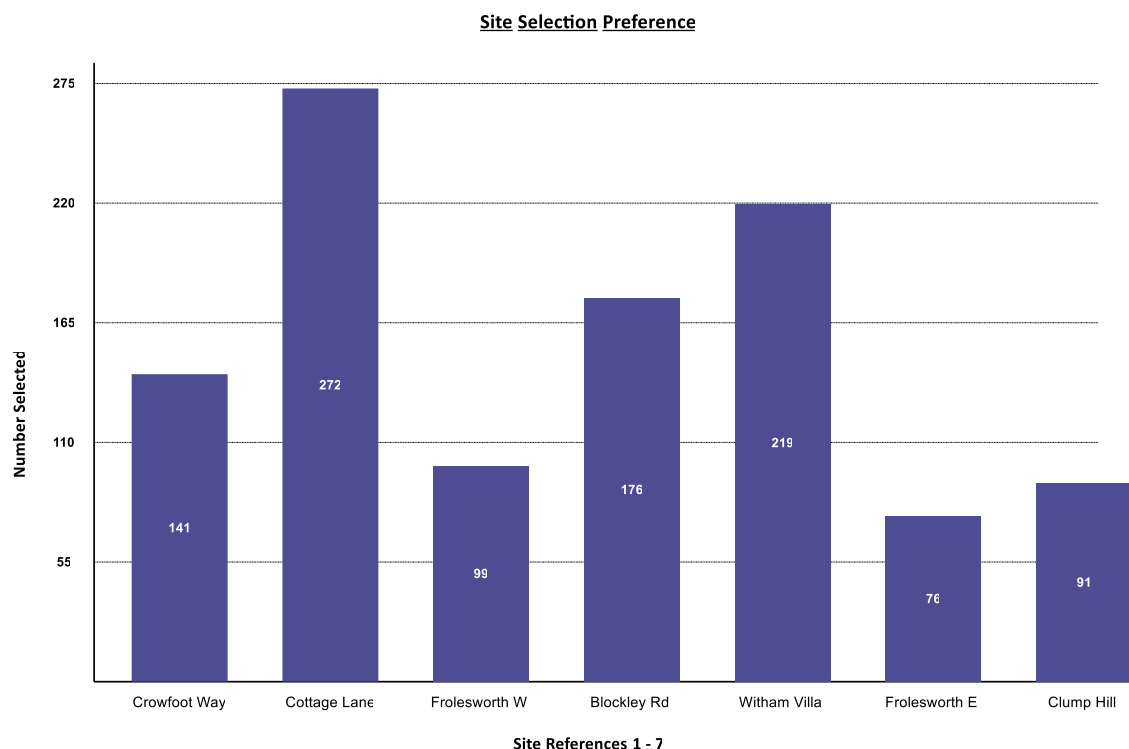


Comparative Observations

Assessment Criteria	Strongest Performing Sites
Little or no Flood Risk	Site 2, Site 1, Site 5, Site 7
Limited Traffic Impact	Site 1, Site 4, Site 5
Less Environmental Impact	Site 2, Site 4, Site 7
Access to Amenities	Site 2, Site 5, Site 6
Development Deliverability	Site 1, Site 2, Site 5
Community Preference	Site 2

Conclusion & Recommendations

Each proposed site offers distinct advantages, with varying levels of feasibility, impact, and community support. Based on the qualitative feedback gathered:





Top Contenders:

Site 2: Cottage Lane (Aldi estate)

Strongest overall performance across key criteria including access, infrastructure readiness, and environmental impact.

Site 5: Witham Villa (Cosby Road)

Demonstrates balanced potential for medium-scale development with minimal infrastructure burden.

Secondary Options:

Site 4: East of Dunton Road (Blockley Road)

A well-connected infill site with limited environmental and community disruption

Site 1: Broughton Chase (Crowfoot Way)

Well-integrated with existing development and high short-term deliverability.

Conditional Opportunities:

Site 3: Frolesworth Road West (Recreation Ground side)

Preferred by several respondents, but flood and traffic issues must be resolved.

Site 7: South Dunton Road (Clump Hill)

Large support for just one phase of development to preserve Clump Hill as open space for the community.

Site 6: Frolesworth Road East (opposite Recreation Ground)

Presents sustainable development potential with a need for infrastructure enhancements.

Site selection:

Following the public consultation, held online and through drop-in sessions between August and September 2025, the Parish Council reviewed the analysis of the results to determine the best development site option for inclusion within the Neighbourhood Plan.

Seven of the possible thirteen sites detailed in the Site Options and Assessment document [Table 5-1 Site Assessment Summary] seven were presented for comment.



- 21/8045 (NP01) Land east of Broughton Chase (Crowfoot Way)
- 21/8220 (NP04) Witham Villa
- 21/8144 Land north of Cottage Lane
- 21/8154 (NP03) Land off Frolesworth Road (Recreation Ground side) [now referred to as 24/10554 in SHLAA]
- 21/8248 Land east of Dunton Road (continuation of Blockley Road and only partial development brought forward)
- 21/8223 (NP05) Land south of Dunton Road (Clump Hill) [now referred to as 24/12209 in SHLAA]
- 21/8218 Land east of Frolesworth Road (opposite Recreation Ground and only partial development brought forward)

Those not included were:

- 21/8249 Land east of Dunton Road (as only partial development plan brought forward).
- 21/8250 Land east of Dunton Road (as only partial development plan brought forward).
- 21/8251 Land east of Dunton Road (as only partial development plan brought forward).
- 21/8252 Land east of Dunton Road (as only partial development plan brought forward).
- 21/8159 Land off Crowfoot Way – not included as alternative site 21/8045 brought forward
- 21/8158 Land off Crowfoot Way – previous objections raised and High Court appeal agreed.
- NP02 Old Mill Road – not included as site access would need to be from Millbrook Drive

Having received the outcomes of the consultation, the NPD&M Group analysed the comments received and of those assessed four were identified at the outset as preferred site options:

- Crowfoot Way
- Witham Villa
- Cottage Lane
- Blockley Road

These four sites received the highest levels of feedback and were therefore examined in greater detail. The analysis considered a range of factors, including:

- Site location and deliverability
- Potential housing numbers
- Traffic and transport infrastructure
- Flooding and drainage concerns
- Impact on the village centre
- Proximity to local amenities
- Environmental impact



The remaining three sites Frolesworth Road West (recreation ground side), Frolesworth Road East, and Clump Hill received fewer than 100 responses each and did not score highly enough for further detailed assessment.

After reviewing all comments and observations from residents, Witham Villa has been selected by the Parish Council as the preferred site for allocation within the emerging Neighbourhood Plan. This site performed strongly across the assessment criteria and aligned well with the community's feedback.

Including at least one allocated development site within the Neighbourhood Plan is an essential requirement. It provides a clear and robust framework for future planning decisions, strengthens local planning policies, and demonstrates the community's commitment to meeting identified housing needs. Importantly, allocating a site helps protect the parish from unplanned or speculative development that could otherwise occur.

The Parish Council would like to thank all residents who took part in the consultation. Your contributions have played a vital role in shaping a plan that reflects local aspirations while ensuring a positive and managed approach to future development.

Stakeholder Engagement Summary

- **Public Engagement:**
 - Four consultation events held
 - **333 attendees** in total
 - **1,267 visits** to consultation page on Parish Council website
 - **302 formal responses** received via comment forms

- **Developer and Agent Submissions:**
 - **Four written submissions** from interested landowners or their representatives

- **Notable additional comments:**
 - Many respondents to the consultation made strong submissions to ensure that the area known as Clump Hill is not developed upon and retained as essential recreational open space.

Appendices (available upon request)

- Full consultation comments and thematic analysis
- Technical summaries of each site (where available)



Appendix C

Neighbourhood Plan

Pre submission consultation responses

No.	Chapter/ Section	Policy Number	Respondent	Comment	Response	Amendment
1			Resident			
	4.3	Policy 1		<p>I strongly support the allocation of Witham Villas (138 homes) as the preferred housing site, provided it incorporates robust flood attenuation measures such as a large balancing pond to intercept runoff from Witham Villas and the adjacent Jelson development before reaching the 750 culvert under Broughton Road, where flooding already occurs.</p> <p>The evidence base — including the Site Assessment Report, Housing Needs Assessment, Environmental Inventory and Sustainability Appraisal — clearly shows this site is the most sustainable and least harmful of all options.</p>	Noted	None
				<p>I strongly support the decision not to allocate the Frolesworth Road site. This land has undergone:</p> <ul style="list-style-type: none"> - No environmental assessment - No sustainability scoring - No landscape impact appraisal - No infrastructure capacity modelling 	Noted	None



				<p>- No cumulative impact testing</p> <p>A speculative proposal of up to 550 dwellings cannot be considered sound, sustainable or justified without this critical evidence. The Neighbourhood Plan is correct not to allocate this site.</p>		
	10.9	Policy 28		<p>The Plan correctly identifies Broughton Astley’s significant flooding and drainage vulnerabilities.</p> <p>Recent flood events show how sensitive the downstream network is, especially around the village centre and brook corridors.</p> <p>A 550-home estate on open farmland at Frolesworth Road would substantially increase runoff and flood pressure, contrary to sustainable development and Policy ENV11.</p>	Noted	None
	9	Policy 19		<p>I fully agree with the Plan’s identification that key village services are already overstretched:</p> <p>GP access is limited</p> <p>School capacity is constrained</p> <p>Road networks are congested at peak times</p> <p>Sewage infrastructure has repeatedly failed</p> <p>Burst water pipes and drainage failures are increasingly common</p> <p>Adding 550 homes would overwhelm infrastructure capacity and undermine sustainable growth.</p>	Noted	None



4.3 4.4	Policy 1 Policy 2		<p>Policy BE1 and the Design Guide correctly prioritise the protection of Broughton Astley’s rural edges and village identity.</p> <p>A 550-home development on Frolesworth Road would:</p> <ul style="list-style-type: none"> - Create harmful urban sprawl - Substantially enlarge the settlement footprint - Destroy rural landscape character - Break key views and open countryside transitions - Undermine the Parish’s ability to maintain meaningful separation between settlements 	Noted	None
10.5	Policy 24		<p>The Neighbourhood Plan and its evidence confirm the importance of maintaining clear physical and perceived separation between Broughton Astley and neighbouring hamlets such as Sutton-in-the-Elms and Frolesworth .</p> <p>The Planning Inspector recently described this separation as: “Finite and fragile.”</p> <ul style="list-style-type: none"> - Even though the Frolesworth Road site is not directly touching Sutton-in-the-Elms, a major southern expansion: - Pushes the built form further toward the settlement gap, - Reduces the rural buffer that maintains distinct identities, - Sets a precedent for future infill or further coalescence pressure, - Conflicts with NP objectives to prevent ribbon development and protect individual settlement character. 	Noted	None



				This harm to settlement identity is a legitimate and material planning concern.		
	7	Policy 13		<p>Traffic congestion and safety issues already affect:</p> <ul style="list-style-type: none"> - Frolesworth Road - Station Road - The Primary School - The Cemetery - Key village junctions <p>A development of 550 homes would significantly increase traffic flows and conflict directly with Policy TRA1.</p>	Noted	None
	10	Policy 26		<p>The Environmental Inventory identifies:</p> <ul style="list-style-type: none"> - Wildlife corridors - Hedgerows - Species-rich habitats - Open countryside views - Green infrastructure <p>A large-scale estate on Frolesworth Road would permanently damage these assets and fragment ecological networks essential to the parish</p>	Noted	None
	General			The Draft Neighbourhood Plan is robust, evidence-led and reflects the true needs and constraints of Broughton Astley.	Noted	None



				<p>I strongly support the decision not to allocate the Frolesworth Road site. This proposal is:</p> <ul style="list-style-type: none"> Unassessed Environmentally risky Infrastructure-heavy Contrary to settlement character Damaging to the Area of Separation and village identity <p>The Neighbourhood Plan provides:</p> <ul style="list-style-type: none"> A sustainable growth strategy Protection of local character & landscape Flood and drainage safeguarding Infrastructure realism Community-supported development levels <p>A 550-home, untested development is incompatible with these objectives. I therefore fully support the Draft Broughton Astley Neighbourhood Plan and its evidence base.</p>		
2			Resident			
	4.3	Policy 1		<p>This is the recent choice of housing allocation. This should be listened to and the reasons behind it follow the plan.</p>	Noted	None
	4.2.2			<p>Coventry Road site has been completed having built its allocation of housing the need for more is not there as a VILLAGE. We are not a town and do not wish to be.</p>		



	10.9	Policy 28		Flooding – Policy 28: There are other available sites preferred by the community other than the Frolesworth Road site that do not flood. The Frolesworth Road site does not comply with any of the points made here.	Noted	None
	10.7	Policy 26		The Frolesworth Road site would adversely affect the habitat connectivity provided by the wildlife corridor identified in figure 10	Noted	None
	10.4 10.2	Policy 23 Policy 21		The Frolesworth Road site does not comply with the; countryside protected for the sake of its intrinsic character, beauty, the diversity of its landscapes, heritage and wildlife, the wealth of its natural resources and to ensure it may be enjoyed by all.	Noted	None
	10.1	Policy 20		The Frolesworth Road site would adversely affect the recreation ground. The Frolesworth Road site would adversely affect the cemetery. The Frolesworth Road site development will result in unacceptable traffic movements, noise, fumes, smell or other disturbance to residential properties, and generate a need for parking that cannot be adequately catered for	Noted	None
	7.1	Policy 13		Frolesworth Road is used as a motorway currently and this will only get worse with such a huge development. Measures to improve pedestrian safety and reduce traffic speed within the village will be supported, including support for the design of large developments as 20 mph zones	Noted	None



	6.3	Policy 12		Frolesworth Road site will generate traffic of a type or amount which would detrimentally affect the character of the countryside and f) would materially harm the character of the surrounding rural area.	Noted	None
	General			A well-thought-out plan, taking the villages' views and concerns on board. We know we must have housing therefore choosing the right location is paramount.	Noted	None
3			Resident			
	General			<p>No overall or aerial photos of appalling floods around church, Frolesworth Road on January 6, 2025. States about development of health facilities but they need to be staffed – are doctors available?</p> <p>The ridge and furrow map does not seem to include the home field at Glebe Farm.</p> <p>Frolesworth Road apart from flood problems is a fairly narrow country road, hardly wide enough for a bus and a car to pass and this road is put forward as the access road for a development. The main street in the village is very busy, parking at shops causes hold ups and, in more houses, and cars and especially at 3pm on school days when traffic builds up around centre of village.</p>	<p>Noted</p> <p>There is no evidence that this is a R&F field.</p> <p>Noted</p>	<p>None</p> <p>None</p> <p>None</p>



4			The Coal Authority			
	General			It is noted that your Authority's boundary falls outside of the coalfield area. On this basis we have no interest in your plan area and no comments to make on the above consultation or on any further emerging planning policy documents.	Noted	None
5			Historic England			
	Policy 29			The area covered by your Neighbourhood Plan includes important designated heritage assets. In line with national planning policy, it will be important that the strategy for this area safeguards those elements which contribute to the significance of these assets so that they can be enjoyed by future generations of the area. If you have not already done so, we would recommend that you speak to the planning and conservation team at your local planning authority together with the staff at the county council archaeological advisory service who look after the Historic Environment Record. They should be able to provide details of the designated heritage assets in the area together with locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway (www.heritagegateway.org.uk). It may also be useful to involve local voluntary groups such as the local Civic Society or local historic groups in the production of your Neighbourhood Plan.	Noted. We have incorporated findings from the HER where appropriate.	None



6			LCC - Highways			
				<p>Flood Risk Management The County Council are fully aware of flooding that has occurred within Leicestershire and its impact on residential properties resulting in concerns relating to new developments. LCC in our role as the Lead Local Flood Authority (LLFA) undertake investigations into flooding, review consent applications to undertake works on ordinary watercourses and carry out enforcement where lack of maintenance or unconsented works has resulted in a flood risk. In April 2015 the LLFA also became a statutory consultee on major planning applications in relation to surface water drainage and have a duty to review planning applications to ensure that the onsite drainage systems are designed in accordance with current legislation and guidance. The LLFA also ensures that flood risk to the site is accounted for when designing a drainage solution. The LLFA is not able to:</p> <ul style="list-style-type: none"> • Prevent development where development sites are at low risk of flooding or can demonstrate appropriate flood risk mitigation. • Use existing flood risk to adjacent land to prevent development. • Require development to resolve existing flood risk. When considering flood risk within the development of a neighbourhood plan, the LLFA would recommend consideration of the following points: • Locating development outside of river (fluvial) flood risk (Flood Map for Planning (Rivers and Sea)). • Locating development outside of surface water (pluvial) flood risk (Risk of Flooding 	<p>These general comments which are not related to the Broughton Astley NP Review are noted.</p>	<p>None</p>



				<p>from Surface Water map). • Locating development outside of any groundwater flood risk by considering any local knowledge of groundwater flooding. • How potential SuDS features may be incorporated into the development to enhance the local amenity, water quality and biodiversity of the site as well as manage surface water runoff. • Watercourses and land drainage should be protected within new developments to prevent an increase in flood risk. All development will be required to restrict the discharge and retain surface water on site in line with current government policies. This should be undertaken through the use of Sustainable Drainage Systems (SuDS). Appropriate space allocation for SuDS features should be included within development sites when considering the housing density to ensure that the potential site will not limit the ability for good SuDS design to be carried out. Consideration should also be given to blue green corridors and how they could be used to improve the biodiversity and amenity of new developments, including benefits to surrounding areas. Often ordinary watercourses and land drainage features (including streams, culverts and ditches) form part of development sites. The LLFA recommend that existing watercourses and land drainage (including watercourses that form the site boundary) are retained as open features along their original flow path and are retained in public open space to ensure that access for maintenance can be achieved. This should also be considered when looking at housing densities within the plan to ensure that these features can be retained. LCC, in its role as LLFA will not support proposals contrary to LCC</p>		
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				<p>policies. For further information it is suggested reference is made to: National Planning Policy Framework (NPPF) House of Commons: Written Statement (HCWS161) Planning practice guidance - flood risk and coastal change National standards for sustainable drainage systems (SuDS) Flood risk mapping is readily available for public use at the links below. The LLFA also holds information relating to historic flooding within Leicestershire that can be used to inform development proposals. Risk of flooding from surface water map: https://www.gov.uk/check-long-term-flood-risk Flood map for planning (rivers and sea): https://flood-map-for-planning.service.gov.uk/</p>		
				<p>Public Rights of Way Leicestershire has an extensive network of Public Rights of Way which are key to allow people to explore the local countryside, link communities and give access to schools, shops, work and facilities. Public Rights of Way are recorded on the Definitive Map and a version of this can be viewed at: https://www.leicestershire.gov.uk/roads-and-travel/cycling-and-walking/where-to-walk-in Leicestershire Public Rights of Way are a material consideration in the determination of Planning applications. National Planning Policy Framework states that “Planning policies and decisions should protect and enhance Public Rights of Way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks...”. Leicestershire County Council will expect that where Public Rights of Way are impacted by</p>	<p>These general comments which are not related to the Broughton Astley NP Review are noted.</p>	<p>None</p>



				development consideration is given not just to replacement or reinstatement but enhancement of the provision.		
				<p>Minerals & Waste Planning</p> <p>The County Council is the Minerals and Waste Planning Authority; this means the council prepares the planning policy for minerals and waste development and also makes decisions on mineral and waste development. Although Neighbourhood plans cannot include policies that cover minerals and waste development, it may be the case that your Neighbourhood contains an existing or planned minerals or waste site. The County Council can provide information on these operations or any future development planned for your Neighbourhood. You should also be aware of Minerals and Waste Safeguarding Areas, contained within the adopted Minerals and Waste Local Plan (Leicestershire.gov.uk). These safeguarding areas are there to ensure that non-waste and non-minerals development takes place in a way that does not negatively affect minerals resources or waste operations. Neighbourhood plan groups should check all proposed site allocations and policy areas against these safeguarding areas by reviewing the relevant 'District councils' minerals and waste safeguarding' map. The County Council can provide guidance on this if your Neighbourhood plan is allocating development in these areas or if any proposed Neighbourhood plan policies may impact on minerals and waste provision.</p>	These general comments which are not related to the Broughton Astley NP Review are noted.	None



			<p>Property Education Whereby housing allocations or preferred housing developments form part of a Neighbourhood Plan the Local Authority will look to the availability of school places within a two-mile (primary) and three-mile (secondary) distance from the development. If there are not sufficient places then a claim for Section 106 funding will be requested to provide those places. It is recognised that it may not always be possible or appropriate to extend a local school to meet the needs of a development, or the size of a development would yield a new school. However, in the changing educational landscape, the Council retains a statutory duty to ensure that sufficient places are available in good schools within its area, for every child of school age whose parents wish them to have one.</p>	<p>These general comments which are not related to the Broughton Astley NP Review are noted.</p>	<p>None</p>
			<p>Strategic Property Services No comment at this time.</p>	<p>Noted</p>	<p>None</p>
			<p>Adult Social Care It is suggested that reference is made to recognising a significant growth in the older population and that development seeks to include bungalows etc. of differing tenures to accommodate the increase. This would be in line with the draft Adult Social Care Accommodation Strategy for older people which promotes that people should plan ahead for their later life, including considering downsizing, but recognising that people's choices are often limited by the lack of suitable local options.</p>	<p>These general comments which are not related to the Broughton Astley NP Review are noted.</p>	<p>None</p>



				<p>Archaeology and the Historic Environment</p> <p>The planning process provides one of the most effective tools to manage the impact of land use change upon the historic environment. This is achieved both through the shaping of development plans (Local and Neighbourhood Plans) and the delivery of development management advice on individual planning applications. In that context, the inclusion of heritage in your Neighbourhood Plan, and the provision of relevant and effective policies, will significantly strengthen the management of these issues, and will be an effective way of the community identifying its own concerns and priorities. Ideally, Neighbourhood Plans should seek to work in partnership with other agencies to develop and deliver this strategic objective, based on robust local evidence and priorities. We recommend that each Neighbourhood Plan should consider the impact of potential development or management decisions on the conservation and enhancement of the historic environment. The historic environment is defined as comprising all aspects of the environment resulting from the interaction between people and places through time, including all surviving evidence of past human activity, whether upstanding, buried or submerged, as well landscapes and their historic components. The Leicestershire and Rutland Historic Environment Record (LRHER) can provide a summary of archaeological and historic environment information for your Neighbourhood Plan area. This will include gazetteers and maps describing the locally identified non-designated heritage assets,</p>	<p>These general comments which are not related to the Broughton Astley NP Review are noted.</p>	<p>None</p>
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				<p>typically archaeological sites (both earthworks and buried archaeological remains), unlisted historic buildings and historic landscapes (parks and gardens). We will also provide information on medieval ridge and furrow earthworks to help you evaluate the surviving earthworks in your area. Information on Designated assets (Scheduled Monuments, Listed Buildings, Registered Parks and Gardens, Battlefields) is available from the National Heritage List for England (NHLE). https://historicengland.org.uk/listing/the-list/ Consideration of the historic environment, and its constituent designated and non-designated heritage assets, is a material consideration in the planning process. While the data held by the LRHER is constantly maintained and updated, it is unlikely that the record represents an exhaustive list of all assets with the plan area. We suggest that information provided by the LRHER should be taken into account when preparing the Neighbourhood Plan and contribute to any list of locally identified heritage assets. Based upon a structured assessment process, this will be the basis of any non-designated heritage assets identified within the plan and given force through the preparation of appropriate heritage policy.</p>		
				<p>Environment With regard to the environment and in line with Government advice, Leicestershire County Council (LCC) would like to see Neighbourhood Plans cover all aspects of archaeology and the historic and natural environment including heritage assets, archaeological sites, listed and unlisted historic</p>	<p>These general comments which are not related to the Broughton Astley NP Review are noted.</p>	<p>None</p>



			<p>buildings, historic landscapes, climate impacts, the landscape, biodiversity, ecosystems, green infrastructure as well as soils, brownfield sites and agricultural land. Climate Change The County Council has an Environment Strategy which is available on Leicestershire County Council’s website. In June 2019 the Climate Change Act (2008) was amended committing the UK to achieving net zero carbon emissions by 2050. Planning is one of the key levers for enabling these commitments to be met. Neighbourhood Plans should, as far as possible, align to Leicestershire County Council’s Environment Strategy. Furthermore, Neighbourhood Plans should, as far as possible, seek to include measures which increase the neighbourhood’s resilience to climate change such as avoiding building on flood plains, using sustainable urban drainage systems, using nature based solutions to reduce flood risk, reducing the amount of non-permeable hard surfaces and encouraging tree planting, green walls and roofs to provide natural shading and cooling. These recommendations not only protect local communities but also enhance well-being, lower energy bills and create prosperous future proof neighbourhoods. The National Planning Policy Framework (NPPF): Meeting the challenge of climate change, flooding and coastal change – paragraphs 161 to 186. Para 161 - The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise</p>		
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			<p>vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure. Landscape The County Council would like to see the inclusion of a local landscape assessment taking into account: Natural England's Landscape character areas; the Leicestershire, Leicester and Rutland Historic Landscape Characterisation Project; the Local District/Borough Council landscape character assessments; and the Landscape Sensitivity and Green Infrastructure Study for Leicester and Leicestershire (2017), which examines the sensitivity of the landscape, exploring the extent to which different areas can accommodate development without impacting on their key landscape qualities. The Local Nature Recovery Strategy for Leicestershire, Leicester and Rutland includes chapters on The National Character Area (5.2) and State of Nature (7) across the strategy area and identifies opportunities for nature recovery: https://www.leicestershire.gov.uk/sites/default/files/2025-07/LLR-Local-Nature-Recovery-Strategy.pdf We would recommend that Neighbourhood Plans should also consider the street scene and Midlands' public realm within their communities, further advice can be found in the latest 'Streets for All East document (2018) published by Historic England https://historicengland.org.uk/images-books/publications/streets-for-all-east-midlands/. For more information on place-making within new development please review Manual for Streets and Manual for Streets 2 Wider Applications of the Principles. Leicestershire County</p>		
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				<p>Council have a new Highway Design Guide. LCC would encourage the development of local listings as per the National Planning Policy Framework (NPPF) and LCC have some data on the social, cultural, archaeological and historic value of local features and buildings (https://www.leicestershire.gov.uk/leisure-and-community/history-and-heritage/historic-environment-record) Contact: her@leics.gov.uk or telephone: 0116 3058323 Examples of policy statements for Landscape: POLICY X: LOCAL LANDSCAPE CHARACTER AREAS – Development proposals falling within or affecting the Local Landscape Character Areas (LLCAs), where possible, enhance the LLCA’s particular characteristics, important views and local distinctiveness. Proposals having a harmful effect on a Local Landscape Character Area’s character will not be supported. Landscape Assessment is a specialist area and accredited landscape consultants can provide advice. https://www.landscapeinstitute.org/ Biodiversity Section 40 of the Natural Environment and Rural Communities Act 2006 (NERC Act) as amended by section 102 (1c) of the Environment Act 2021 places what is called the strengthened biodiversity duty on all public authorities in England and Wales to conserve and enhance biodiversity, in the exercise of their duties. The National Planning Policy Framework (NPPF) clearly outlines the importance of sustainable development alongside the core principle that planning should contribute to conserving and enhancing the natural environment, providing net gain for biodiversity, and reducing pollution. Neighbourhood Plans should therefore seek to work in partnership with other</p>		
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			<p>agencies to develop and deliver a strategic approach to protecting and improving the natural environment based on local evidence and priorities. Each Neighbourhood Plan should consider the impact of potential development or management of open spaces on enhancing biodiversity and habitat connectivity, such as hedgerows and greenways. Habitat permeability for species which addresses encouragement of movement from one location to another such as the design of street lighting, roads, noise, exposure to chemicals, obstructions in water, exposure of species to predation, Invasive and Non-Native Species, and arrangement of land uses should be considered. The Neighbourhood Plan can be used to plan actions for the parish council on its' own land (community actions) and guide the actions of others (policy actions). In July 2025 the Local Nature Recovery Strategy (LNRS) for Leicestershire, Leicester and Rutland was launched. The LNRS sets out the landscape scale priorities for nature recovery across the area, identifying priority areas and measures. Details on the LNRS and supporting resources can be found here: https://www.leicestershire.gov.uk/environment-and-planning/local-nature-recovery-strategy/leicestershire-leicester-and-rutland-local-nature-recovery-strategy Local Nature Recovery Strategies are not intended to provide red line boundaries preventing or placing new restrictions on land use which may be changed either through development or in taking advantage of new opportunities identified through the strategy. This has been established by national guidance. LNRS's are an additional evidence base to inform Local Plans, and other elements of the</p>		
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			<p>formal Development Plan which include Neighbourhood Plans and the proposed new Spatial Development Strategies. Local Plans remain the primary tool used by local planning authorities to determine which land should be developed and how. For specific advice on species and habitats of importance in the County and actions that can make a difference to their conservation and ways to increase the quality and quantity of these, please refer to the Leicestershire and Rutland Biodiversity Action Plan: https://www.lrwt.org.uk/about-us/caring-wild-places/biodiversity-action-plan https://www.leicestershire.gov.uk/sites/default/files/2025-07/LLR-Local-Nature-Recovery-Strategy.pdf https://www.leicestershire.gov.uk/environment-and-planning/planning/biodiversity/planning-and-biodiversity</p> <p>The Leicestershire and Rutland Environmental Records Centre (LRERC) can provide a summary of wildlife information for your Neighbourhood Plan area. This will include a map showing nationally important sites (e.g. Sites of Special Scientific Interest); locally designated Wildlife Sites; locations of badger setts, great crested newt breeding ponds and ponds with high potential to support great crested newts and bat roosts; and a list of records of protected and priority Biodiversity Action Plan species. These are all a material consideration in the planning process. If there has been a recent Habitat Survey of your plan area, this will also be included. LRERC is unable to carry out habitat surveys on request from a Parish Council, although it may be possible to add it into a future survey programme. Contact: LRERC@leics.gov.uk., or phone 0116</p>		
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				<p>305 1087 https://www.leicestershire.gov.uk/environment-and-planning/planning/leicestershire-and-rutland-environmental-records-centre-lrerc, For informal advice on actions for nature that can be taken forward on parish land please contact EnvironmentTeam@Leics.gov.uk There are many protected species of plants and animals in England and often their supporting features and habitats are also protected. What you can and cannot do by law varies from species to species and may require a preliminary ecological appraisal. For information on protected species and the law please visit: https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications Examples of policy statements that can be added to the plan to support biodiversity: POLICY X: BIODIVERSITY PROTECTION IN NEW DEVELOPMENT – Consideration should be made in the design and construction of new development in the Plan Area to protect and enhance biodiversity, where appropriate, including:</p> <ul style="list-style-type: none">• Roof and wall construction should incorporate integral bee bricks, bird nest boxes and bat breeding and roosting boxes. Target species and locations to be based on advice sought from the Local Authority’s Biodiversity Officer (or equivalent).• Hedges (or fences with ground-level gaps) should be used for property boundaries to maintain connectivity of habitat for hedgehogs and other terrestrial animals.• Work with landowners to ensure good maintenance of existing hedgerows, gap up and plant new hedgerows where appropriate and introduce a programme of replenishing hedgerow trees.• Avoidance of all unnecessary exterior artificial lighting: there is no legal duty requiring any place to be lit.• Security lighting, if essential,		
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			<p>should be operated by intruder sensors and illuminated for no longer than 1 minute. Sports and commercial facility lighting should be switched off during agreed 'curfew' hours between March and October, following best practice guidelines in Bats and Lighting Leicestershire Environmental Records Centre, 2014. • Lighting design, location, type, lux levels and times of use should follow current best practice, e.g. by applying the guidelines in Guidance note 08/18 Bats and artificial lighting in the UK: Bat Conservation Trust / Institution of Lighting Professionals, 2018. • Natural/semi natural grassland margins adjacent to hedges of up to 5m buffer. • Retain natural features wherever possible. • In creating habitats, consider the underlying geology and allow natural colonisation near local high-quality habitats. • Avoid use of topsoil to promote plant diversity, especially in areas of limestone or areas near to heathland - consider exposing sandy soils to encourage acid grassland and heath. • Allow for structural diversity of habitats – for example long and tall grass, to maintain a suitable grassland habitat for wildlife. A management plan should accompany all planning applications. • Avoid development and hard landscaping next to watercourses. • Restore naturalness to existing watercourses for example by retaining some steeper earth banks suitable for Kingfisher and Water Vole breeding. • Retain areas of deadwood within the site to maintain biodiversity. • Plant 30% of trees with a selection of larger native species and create lines of trees (this could support the feeding zone of bats for instance and well managed hedges can do the same). Green Infrastructure</p>		
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			<p>Green infrastructure (GI) is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities (NPPF definition). GI includes parks, open spaces, playing fields, woodlands, street trees, cemeteries/churchyards, allotments and private gardens as well as streams, rivers, canals and other water bodies and features such as rain gardens, pocket parks and swales. The NPPF places the duty on local authorities to plan positively for a strategic network of GI which can deliver a range of planning policies including: building a strong, competitive economy; creating a sense of place and promoting good design; promoting healthier communities by providing greater opportunities for recreation and mental and physical health benefits; meeting the challenges of climate change and flood risk; increasing biodiversity and conserving and enhancing the natural and historic environment, and providing space for nature recovery. Looking at the existing provision of GI networks within a community can influence the plan for creating & enhancing new networks. Neighbourhood Plan groups have the opportunity to plan GI networks at a local scale to maximise benefits for their community and in doing so they should ensure that their Neighbourhood Plan is reflective of the relevant Local Authority Green Infrastructure strategy. Through the Neighbourhood Plan and discussions with the Local Authority Planning teams and potential Developers communities are well placed to influence the delivery of local scale GI networks. Sites that are designated as Local Green Spaces can form an important strategic part of local</p>		
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			<p>Green Infrastructure and can be conserved and enhanced to make an important contribution to the district green infrastructure. Delivery of the conservation and enhancement can be dealt with in Policy and Community Actions. NPs should be aware of the Local Nature Recovery Strategy for Leicester, Leicestershire and Rutland to consider how the sites and the management of them within the Neighbourhood area can contribute to the strategy and action for delivery.</p> <p>https://www.leicestershire.gov.uk/environment-and-planning/local-nature-recovery-strategy/what-a-local-nature-recovery-strategy-is Brownfield, Soils and Agricultural Land The NPPF encourages the effective use of brownfield land for development, except where this would conflict with other policies in the NPPF Framework, including causing harm to designated sites of importance for biodiversity. Neighbourhood planning groups should check with Defra and the District or Borough council who keep a register of brownfield sites to see if their neighbourhood planning area includes brownfield sites. Where information is lacking as to the ecological or heritage value of these sites then the Neighbourhood Plan could include policies that ensure such survey work should be carried out to assess the ecological and heritage value of a brownfield site before development decisions are taken. Soils are an essential finite resource on which important ecosystem services and food production depend. They should be enhanced in value and protected from adverse effects of unacceptable levels of pollution. Within the government's "Safeguarding our Soils" strategy, Defra have</p>		
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			<p>produced a code of practice for the sustainable use of soils on construction sites which could be helpful to neighbourhood planning groups in preparing environmental policies. High quality agricultural soils should, where possible, be protected from development and where a large area of agricultural land is identified for development poorer quality areas should be used in preference to the higher quality areas. Neighbourhood planning groups should consider mapping agricultural land classification within their plan to enable informed decisions to be made in the future. Natural England can provide further information and Agricultural Land classification and have produced the following guide.</p> <p>https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land.</p> <p>The British Society for Soil Science provide advice on what should be expected of developers in assessing land for development suitability. https://soils.org.uk/wp-content/uploads/2022/02/Assessing-Agricultural-Land-Jan-2022.pdf</p> <p>Strategic Environmental Assessments (SEAs) Information for Neighbourhood Planning groups regarding Strategic Environmental Assessments (SEAs) can be found on the Neighbourhood Planning website (https://neighbourhoodplanning.org/toolkits-and-guidance/understand-plan-requires-strategic-environmental-assessment-sea/) and should be referred to. A Neighbourhood Plan must meet certain basic conditions in order to be 'made'. It must not breach and be otherwise compatible with the Environmental Assessment</p>		
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			<p>of Plans and Programmes Regulations SI 2004/1633 (available online). These regulations deal with the assessment of environmental plans and programmes and implement Retained Reference Directive 2001/42 'on the assessment of the effects of certain plans and programmes on the environment'. Not every Neighbourhood Plan needs a SEA; however, it is compulsory to provide when submitting a plan proposal to the local planning authority either:</p> <ul style="list-style-type: none">• A statement of reasons as to why SEA was not required• An environmental report (a key output of the SEA process). <p>As a rule of thumb, SEA is more likely to be necessary if both of the following two elements apply:</p> <ul style="list-style-type: none">• a Neighbourhood Plan allocates sites for development (for housing, employment etc.); and• the neighbourhood area contains sensitive environmental assets (e.g. a Site of Special Scientific Interest (SSSI) or an Area of Outstanding Natural Beauty (AONB)) that may be affected by the policies and proposals in the Neighbourhood Plan. <p>In light of these two considerations, it is very unlikely that a Neighbourhood Plan would require SEA if the plan is not allocating land for development. This is because allocating land for development is more likely to generate physical changes which lead to significant effects. As the UK has now left the EU, Neighbourhood Planning groups should remain mindful of any future changes which may occur to the above guidance. Changes may be forthcoming as a result of the Levelling Up and Regeneration Act (LURA). This proposes 'Environmental Outcome Reports' to replace the current system of Strategic Environmental Assessment (including Sustainability Appraisals) and Environmental Impact</p>		
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			<p>Assessment and introduce a clearer and simpler process where relevant plans and projects (including Nationally Significant Infrastructure Projects) are assessed against tangible environmental outcomes. Prior to the new Labour government taking office, the provisions in the Act to enable the EORs to be brought forward had not been enacted and this remains the situation as of summer 2025 and is likely to continue beyond 2025. Impact of Development on Household Waste Recycling Centres (HWRC)</p> <p>Neighbourhood planning groups should remain mindful of the interaction between new development applications in a district and borough area and the existing HWRC services delivered by Leicestershire County Council. The County Council's Waste Management team considers the impact of increased waste arisings from proposed developments on a case by case basis and when it is identified that a proposed development will have a detrimental effect on the local HWRC infrastructure then appropriate projects towards site reconfiguration and/or development of waste infrastructure to increase the capacity for the nearest HWRC or any other HWRC directly impacted by the development have to be initiated. Planning obligations to fund these projects are requested in accordance with the Leicestershire County Council's Planning Obligations Policy and the three CIL tests (as per Regulation 122 under the Community Infrastructure Regulations 2010 (as amended)) as described below; A planning obligation is a legally enforceable commitment (secured within a Section 106 agreement or S106 unilateral undertaking (as per s106 of the Town and Country Planning Act 1990 (as amended)))</p>		
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				<p>entered into to mitigate the impacts of development. Planning obligations can only be sought (and considered to be CIL compliant) where they meet the following 3 tests: • necessary to make the development acceptable in planning terms; • directly related to the development; • fairly and reasonably related in scale and kind to the development;</p>		
				<p>Public Health Health is shaped by many different factors throughout our lives. Health is affected by the settings in which we live, work, learn and play. These influences start to determine health and opportunities for better health from birth and throughout the whole life course, for example the environment, community, transport, education and income. This complex range of interacting social, economic and environmental factors are known as the wider determinants of health or the social determinants of health. When there is a difference in these conditions it contributes to health inequalities- “Health inequalities are the preventable, unfair and unjust differences in health status between groups, populations or individuals that arise from the unequal distribution of social, environmental and economic conditions within societies” (NHS England) The diagram below illustrates types of wider factors that influence an individual’s mental and physical health. The diagram shows: • personal characteristics at the core of the model and this includes sex, age, ethnic group, and hereditary factors • The layer around the core contains individual ‘lifestyle’ factor behaviours such as smoking, alcohol use, and physical activity • The next layer contains</p>	<p>These general comments which are not related to the Broughton Astley NP Review are noted.</p>	<p>None</p>



			<p>social and community networks including family and wider social circles • The next layer covers living and working conditions include access and opportunities in relation to jobs, housing, education and welfare services • The final outer layer is general socioeconomic, cultural and environmental conditions and includes factors such as disposable income, taxation, and availability of work</p> <p>Research by the Robert Wood Johnson Foundation, looked into the major contributors to health and wellbeing and found that: Health Behaviours contribute to 30% of health outcomes made up of: • Smoking 10% • Diet/Exercise 10% • Alcohol use 5% • Poor sexual health 5% Socioeconomic Factors contribute to 40% of health outcomes: • Education 10% • Employment 10% • Income 10% • Family/Social Support 5% • Community Safety 5% Clinical Care contributes to 20% of health outcomes: • Access to care 10% • Quality of care 10% Built Environment contributes to 10% of health outcomes: • Environmental Quality 5% • Built Environment 5%</p> <p>Source: Robert Wood Johnson Foundation and University of Wisconsin Population Health Institute, Used in US to rank Counties by health Status Therefore, due to the complex way in which the built environment and communities we live in impact on our health any opportunity to mitigate negative impacts and enhance positive outcomes should be taken. Completing a Health Impact Assessment (HIA) is a good practice to ensure neighbourhood concerns and recommendations are considered. Undertaking a HIA as part of your neighbourhood plans has the potential to influence all these areas, alongside influencing decisions made about</p>		
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			<p>access to care through transport and infrastructure. To aid you in undertaking a HIA please visit: Health Impact Assessments Leicestershire County Council Professional Services Portal At the bottom of this page there are also links to a number of local data sheets at a district level. You can also familiarise yourself with the health profile for your area by visiting: https://fingertips.phe.org.uk/profile/health-profiles Leicestershire Inequalities JSNA Tableau Public and Health Inequalities and Wider Determinants of Health LSR Online Dahlgren G, Whitehead M. (1991). Policies and Strategies to Promote Social Equity in Health. Stockholm, Sweden: Institute for Futures Studies. NHS England, “Reducing health inequalities resources,” [Online]. Available: https://www.england.nhs.uk/about/equality/equality-hub/resources/ [Accessed February 2021]. Active Together An ever-increasing body of research indicates that the environment in which we live is inextricably linked to our health across the life course. For example, the design of our neighbourhoods can influence physical activity levels, travel patterns, social connectivity, mental and physical health and wellbeing outcomes.” (Spatial Planning for Health- An evidence resource for planning and designing healthier places; Public Health England, 2017) There is growing evidence that the design of our built environments, places and travel routes can either discourage or encourage people to be physically active depending on how they are designed and constructed. The latest evidence shows that; there are still more than one in four adults doing less than 30 minutes of activity per week. People in</p>		
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				<p>the UK are around 20% less active now than in the 1960's and the evidence also show that physical inactivity affects groups unequally, with women, people from ethnically diverse communities, people living in more deprived areas, people with disabilities, and people with long-term health conditions less likely to be active. Medically there is no dispute that increasing the level of physical activity is directly linked to improvement in physical and mental health and that regular physical activity contributes to a reduction in particular health conditions i.e. obesity, CHD, diabetes and cardiovascular disease). Designing our neighbourhoods in a way that proactively encourages communities and residents to walk, cycle and be active is an important factor in improving population health. Over the next 30 years there are opportunities to shape the design of our neighbourhoods, residential developments, travel routes, town centres, employment spaces and other environments in such a way that physical activity (walking, cycling, recreational exercise) becomes an easy choice and benefits the health of our local population. Active Together encourages neighbourhood plans to adopt the 10 principles of Active Design Guidance. This is national published guidance for Local Authorities and place making stakeholders developed by Sport England, Active Travel England and the Department of Health and Social Care. Active Design aims to create places and spaces which encourage people to move more, with more opportunities for everyone to increase their activity levels and lead healthier lives. The full guidance can be accessed via Sport England: https://www.sportengland.org/guidance-and-</p>		
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				<p>support/facilities-and-planning/design-and-cost guidance/active-design The Ten Principles of Active Design Foundational Principles 1. Activity for all Supporting Active Travel 2. Walkable Communities 3. Providing connected active travel routes 4. Mixing Uses and co-locating facilities Active, High-Quality Places and Spaces 5. Active buildings inside and out 6. Providing activity infrastructure 7. High-quality streets and spaces 8. Network of multi-functional open spaces Creating and Maintaining Activity 9. Activating spaces 10. Maintaining high-quality flexible spaces The places we inhabit can have a considerable effect on our health, behaviour and quality of life. Places that provide opportunities for people to lead physically active lives can positively impact people's physical and mental wellbeing. But the opposite can also be true, where the design of a place creates barriers making it difficult, unpleasant or inconvenient for people to be physically active Embedding principles of developing Active Environments at a strategic level could result in:</p> <ul style="list-style-type: none">• Housing developments which make walking and cycling the preferred method of individual transport and reduced reliance on the car and motorised transport.• Neighbourhoods where people live closer to where they work, and sustainable transport becomes a realistic option.• Safe mixed-use developments and neighbourhoods where residents feel safe and encouraged to maximise outdoor space for travel and recreation.• A contribution to increasing local population physical activity levels and a factor in reducing air pollution and maximising green infrastructure• Supporting Local Authority corporate challenges to improve health outcomes, develop		
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			<p>community cohesion, and impact on community safety and neighbourhood resilience. The benefits of places that encourage activity go beyond just public health. Compact, walkable, linked communities that are centred around people being active rather than using cars:</p> <ul style="list-style-type: none">• Are more environmentally friendly,• Have lower carbon emissions,• Have better air quality,• Are more socially inclusive,• Are more economically productive. <p>Active Environments: 1. More environmentally friendly 2. Better air quality 3. More economically productive 4. More socially inclusive 5. Lower carbon emissions</p> <p>Sport England have produced a useful Active Design check list for Local Authorities to use in the planning of places and new environments: Active Design Checklist</p> <p>There is further published planning support guidance that encourages the design of local and neighbourhood plans to adopt principles that encourage provision for physical activity and sport: Planning for Sport</p> <p>Active Together supports and works collaboratively with Leicestershire County Council Public Health Team to encourage health-based planning and supports the use of Health Impact Assessments and use of local health data to support planning decisions</p> <p>Other useful information and guidance for the healthy design of local places has been collated and can be found at: https://www.active-together.org/active-environments</p> <p>https://www.active-together.org/active-environments</p> <p>Active Together would welcome the opportunity to discuss the development of the neighbourhood plan and examine, with the Parish Council, the opportunities for shaping infrastructure design, systems and processes within the plan that would</p>		
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				maximise physical activity opportunities for those communities and residents impacted by the neighbourhood plan.		
				<p>Communities</p> <p>Consideration of community facilities is a positive facet of Neighbourhood Plans that reflects the importance of these facilities within communities and can proactively protect and develop facilities to meet the needs of people in local communities. Neighbourhood Plans provide an opportunity to;</p> <ol style="list-style-type: none"> 1. Carry out and report on a review of community facilities, groups and allotments and their importance with your community. 2. Set out policies that seek to; <ul style="list-style-type: none"> • protect and retain these existing facilities, • support the independent development of new facilities, and, • identify and protect Assets of Community Value and provide support for any existing or future designations. 3. Identify and support potential community projects that could be progressed. You are encouraged to consider and respond to all aspects of community resources as part of the Neighbourhood Planning process. Further information, guidance and examples of policies and supporting information is available at www.leicestershirecommunities.org.uk/np/useful-information. 	These general comments which are not related to the Broughton Astley NP Review are noted.	None
				<p>Economic Development</p> <p>We would recommend including economic development aspirations with your Plan, outlining what the community</p>	These general comments which are not related to the Broughton	None



				currently values and whether they are open to new development of small businesses etc.	Astley NP Review are noted.	
				<p>Fibre Broadband</p> <p>Our ambition is for a Digital Leicestershire. This includes the ambition for everyone to have access to fast, accessible, inclusive, reliable digital infrastructure and we are working to support government targets to achieve gigabit capable, lightning-fast broadband connections to 85% of the UK by December 2025, increasing to near universal coverage by 2030. A fast and reliable digital infrastructure will open new opportunities for residents, communities and businesses. It will underpin innovation, improve community and social networks and support learning and development for all. It will help to deliver a range of societal benefits including the more effective provision of public services, information and connect people to support at the point of need. The Digital Leicestershire team manages programmes aimed at improving digital infrastructure in the county. This includes superfast, ultrafast and full fibre broadband. This work combines three approaches; engaging with commercial operators to encourage private investment in Leicestershire, working with all tiers of government to reduce barriers to commercial investment, and operating intervention schemes with public funds to support deployment of digital infrastructure in hard-to-reach areas that are not included in broadband suppliers' plans, reaching parts of the county that might otherwise miss out on getting the digital connectivity they need. We are</p>	These general comments which are not related to the Broughton Astley NP Review are noted.	None



			<p>currently providing support throughout the county with our Gigabit and Gigahub programmes. How does this role relate to neighbourhood plans? The UK government has brought into force new laws that require new homes in England to be built with gigabit broadband connections and enables telecoms firms to be able to get faster broadband to nine million people living in blocks of flats across the UK. Ministers have amended the Building Regulations 2010 to ensure that new homes constructed in England will be fitted with infrastructure and connections capable of delivering gigabit broadband - the fastest internet speeds on the market. The updated regulations mean that more people moving into new homes will have a gigabit capable broadband connection ready when construction is completed, avoiding the need for costly and disruptive installation work after the home is built and enabling residents to arrange the best possible internet service at the point they move in. In a further boost to people's access to better broadband, another new law has made it easier to install faster internet connections in blocks of flats when landlords repeatedly ignore requests for access from broadband firms. Both of these new laws came into effect on 26 December 2022. The updated building rules mean home developers will be legally required to future-proof new homes in England for next-generation gigabit broadband as standard practice during construction. Connection costs will be capped at £2,000 per home for developers and they will work together with network operators to connect developments to the gigabit network. It is estimated that over 98 per cent of premises fall within</p>		
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				<p>this cap, meaning moving into a new build property without lightning-fast internet speeds will become a thing of the past for the vast majority of people across England. Where a developer is unable to secure a gigabit-capable connection within the cost cap, developers must install the next fastest connection available. And even where a gigabit-capable connection is not available within the cost cap, gigabit ready infrastructure, such as ducts, chambers and termination point, still needs to be installed. This will ensure that homes are fit for the digital age but may not be connected straight away. The Council supports a ‘dig once’ approach for the deployment of communications infrastructure and a build which is sympathetic to the character and appearance of the surrounding area. The Council encourages telecommunications build which does not significantly impact on the appearance of any building or space on which equipment is located and which minimises street clutter. Groups working on emerging neighbourhood plans are encouraged to visit the Digital Leicestershire web site to learn more about current and forthcoming full fibre broadband provision for their local area https://www.thinkbroadband.com/ and also BDUK (Building Digital UK)</p>		
				<p>Equalities While we cannot comment in detail on plans, you may wish to ask stakeholders to bear the Council’s Equality Strategy 2020-2024 in mind when taking your Neighbourhood Plan forward through the relevant procedures, particularly for engagement and consultation work. A copy of the strategy</p>	<p>These general comments which are not related to the Broughton Astley NP Review are noted.</p>	<p>None</p>



				<p>can be view at: https://www.leicestershire.gov.uk/sites/default/files/2024-10/equality-diversity-and-inclusion-strategy-2024-2028.pdf The Neighbourhood plan should comply with the main requirements of the Public Sector Equality Duty. This requires public bodies to have due regard of the need to: Eliminate discrimination Advance equality of opportunity Foster good relations between different people</p>		
7			St Mary's Church			
	10.9	Policy 28		<p>The District Church Council is concerned by the possibility of increased flood risk to the area around St Mary's Church (a Grade 2* listed historic building) by increased housing and associated hard surfaces. We are told that building new properties not only puts new homes at risk, but it puts additional pressure on already strained drainage systems, which become overwhelmed in heavy downpours, increasing the risk of flooding to existing homes in the immediate areas. Already the area around St Mary's Church is subject to flooding in times of high rainfall and this poses a risk to the structure of this medieval building. We would ask that serious consideration is given to this issue</p>	Noted. Policy 28 tackles issues related to climate change and seeks to restrict flooding in affected areas.	None
8			Resident			
	General			<p>My particular interest in the Proposed Neighbourhood Plan is the Housing Development Plan. I support the Parish Council's preference to distribute the housing requirement across smaller sites, with emphasis on the Witham Villa site. The proximity of this site to good</p>	Noted	None



				<p>road networks and local amenities make this the most suitable option for the foreseeable future.</p> <p>I think that any proposal to develop residential sites along the Frolesworth Road would adversely affect the whole community. This is a rural road giving access to open countryside. It is well used by the local horse riders, cyclists, walkers, runners and the general public. Any additional housing development, with the consequent increase in traffic, would be detrimental to Broughton Astley village.</p> <p>I hope that your proposals for the future Neighbourhood Plan are accepted by the HDC.</p>		
9			Environment Agency			
				Having reviewed the submitted documents, we have no adverse comments to make.	Noted	None
10			Natural England			
	General			Natural England does not have any specific comments on this draft Neighbourhood plan.	Noted	None
11			Resident			
	10.10.1	Policy 29		Should include the area from the disused railway line up to and including Clump Hill (plot no.149) – this area has been identified as a site of prehistoric burials (late Neolithic to early Bronze Age) as per HER Ref MLE1318 together with	MLE1318 is a record of a find-spot (1926) of two possible neolithic	None



			<p>important artifacts including a potential 'beaker flint' or 'dagger'. Please refer to: https://www.heritagegateway.org.uk/Gateway/Results_Single.aspx?uid=MLE1318&resourceID=1021</p> <p>Additionally, an area of 'ridge and furrow' together with evidence of an iron age settlement including roundhouses, was discovered within the field at the end of Crowfoot Way. Based on nearby findings, we would suggest that the settlement may extend up to an around Clump Hill. Please refer to: https://ariadne-portal.d4science.org/resource/6d129d4ca6af4c0ab3bd472cc3e4985d7f380bcc04a3b52445bd80c3758cc2ae</p>	<p>burials and a piece of flint that was 'discarded'. There is no evidence in the HER that there is still 'proven buried archaeology', which is the criterion for inclusion under Policy ENV 29/31</p> <p>ELE9383 is no longer in the Leicestershire HER, as the site was cleared to be part of the works for the new development. Extension of the iron age settlement to Clump hill is conjectural; as above the criteria for inclusion in the NP are not met</p>	None
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	General			<p>The proposed Neighbourhood Plan doesn't appear to make reference to the Minerals Safeguarding Plan. The area from the disused railway line extending up to Clump Hill (plot no 149 and 148) is designated as a Mineral Consultation Area and therefore, as an important factor within planning decisions, should be designated as such within the Neighbourhood Plan. Please refer to:</p> <p>https://www.broughton-astley.gov.uk/uploads/land-south-of-dunton-road.pdf?v=1756457630</p>	Mineral extraction is a County matter and not something that the NP can have policies about.	None
12			National Gas Transmission			
	General			<p>National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document. About National Gas Transmission National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. Proposed sites crossed by or in close proximity to National Gas Transmission Assets Following a review of the above document we have identified the following National Gas Transmission assets as falling within the Neighbourhood area boundary: Asset Description Gas Transmission Pipeline, route: BLABY TO ALREWAS A plan showing details of National Gas</p>	Noted	None



				<p>Transmission’s assets is attached to this letter. Please note that this plan is illustrative only. National Gas Transmission also provides information in relation to its assets at the website below. • https://www.nationalgas.com/land-and-assets/network-route-maps Please see attached information outlining guidance on development close to National Gas Transmission infrastructure. Distribution Networks Information regarding the gas distribution network is available by contacting: plantprotection@cadentgas.com</p>		
13			Resident			
	General			<p>The NP refers to the 2011 census; however the last census was 2021 (see below) so can we reference that census? Census 2021 and 2022 UK data Census 2021 took place in England, Wales and Northern Ireland in March 2021. Scotland's census took place in March 2022. This difference in the timing of data collection made the production of UK results more challenging than usual. However, ONS worked with NISRA and NRS to develop a method for interpolating Scotland numbers for March 2021, allowing the creation of statistics for the UK as a whole. More details, including a range of tables produced using this method, are available at Census-based statistics, UK 2021.</p>	At the time of the Housing Needs Assessment, some data from 2021 was not available. This will be updated where possible.	Change to be made as indicated.
	1.3.3	Page 4		<p>The relevant development plan for the area is the Harborough Local Plan which was adopted by Harborough District Council in April 2019.</p>	Agreed. This paragraph will be updated to	Change to be made as indicated.



			<p>The Local Plan identifies Strategic Development Areas (SDAs) East of Lutterworth and at Scraftoft North, as the principal means of meeting Harborough District’s housing and employment needs.</p> <p>Broughton Astley is identified as a Key Centre. Taking into account the delivery of existing commitments and completions and an allowance for windfalls, Broughton Astley is not expected to accommodate major new housing or employment development.</p> <p>If we can edit it, should we be adding a paragraph explaining the change of housing allocation. We have consulted extensively on this fact.</p> <p>In 2025, Harborough District Council brought forward a new Local Plan which allocated 475 new dwellings. Throughout the consultation the Parish Council have presented the residents preferred locations for new building.</p>	<p>reflect the Regulation 19 Local Plan and evidence base.</p>	
		Page 5	<p>In light of the technical glitch, does this paragraph need to be altered</p> <p>Representations on the contents of the Pre- Submission Draft of the Plan can be submitted to the Parish Council. These must be received by 16 January 2026. There will be an open event in the Village Hall on Saturday 10 January 2026 where you can read the policies and speak to members of the Neighbourhood Plan Committee. Please look for further information.</p>	<p>This paragraph will be removed within the submission version of the NP.</p>	<p>Change to be made as indicated.</p>



3.1			<p>1. Estley Green, a 2.2-hectare business park to the north of Cottage Lane Industrial Estate, has planning permission. The Corner House Garage was the first occupier and Phase 1 of the Business Park is now complete.</p> <p>Question: what is Phase 2 of the business park? I can't find a reference to it on the web.</p>	Noted. We will remove the reference to the phases.	Change to be made as indicated.
	Page 18		<p>They include just 12 bungalows- none of these have been for market sale.</p> <p>I don't understand this phrase. Were they all social housing or housing association or something meaning they did not appear on the open market?</p>	This is correct. We will make this clear.	Change to be made as indicated.
	Page 23		<p>In 2011 (the latest date for which information is currently available) of 3,422 households, only 243 households (7.1%) had no car or van. This is 11.8% across Harborough as a whole. 14.6% of households had 3 or more cars or vans (12.8% across Harborough).</p>	We will update this to reflect figures from 2021.	Change to be made as indicated.
5.2	Policy 8		<p>New residential development should ensure that there is appropriate provision for car parking in line with Highways Standards.</p> <p>I think this wording can be improved as this is specific to village centre. My suggestion is</p>	Agreed	Change to be made as indicated.



				For new developments in the village centre, residential or business, they should ensure that there is appropriate provision for car parking in line with Highways Standards.		
	Page 26	Figure 5		<p>The area outlines is labelled Estley green Industrial estate but in the text is Cottage Lane Industrial Estate and Estley Green Business Park.</p> <p>The label on the map should be corrected to match the text. Ideally the two areas should be shown as separate blocks.</p>	Agreed	Change to be made as indicated.
	6.2.2			<p>Estley Green is a new business park that is located immediately to the north of the Cottage Lane Industrial Estate. The business park was allocated in the first Neighbourhood Plan and will provide some 2.2 hectares of industrial development comprising both speculative and bespoke industrial accommodation to suit occupier requirements. Units range from 248m² to 513m². The Corner House Garage was the first occupier and Phase 1 of the Business Park is now complete.</p> <p>This is now in place and therefore should the highlighted wording be provides.</p> <p>QUESTION Phase 1 is now complete but what is phase 2? I don't believe there is more industrial expansion on that site?</p>	<p>Agreed</p> <p>We will remove the reference to phase 1.</p>	<p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p>



	Page 30			<p>Opening section about traffic:</p> <p>Other areas of concern include Cottage Lane and Frolesworth Road.</p> <p>Can I recommend we strengthen this last part. Here is suggestion</p> <p>There is a serious issue with the volume and speed of traffic entering Broughton Astley on Frolesworth Road, particularly due to the location of entrance to the recreation ground. This is despite it being a country road and not suitable for commuter traffic volumes</p> <p>Cottage Lane is a single carriage road leaving the village to join the A426 Lutterworth Road. It is used by vehicles trying to avoid the congestion along Dunton Road. However, this road is not suitable for any volume of traffic and is also popular with walkers accessing the countryside.</p>	Agreed	Change to be made as indicated.
	7	Policy 13		<p>New housing or commercial development should demonstrate that:</p> <p>The cumulative impact on traffic flows on the strategic and local highway network, including the roads within and leading to the village centre, will not be severe, unless</p>	Agreed	Change to be made as indicated.



			<p>appropriate mitigation measures are undertaken where feasible;</p> <p>Can we delete the words where feasible. If the mitigations cannot be made then we should resist the development. Otherwise any action can easily be avoided with the excuse of “not feasible”.</p> <p>Measures to improve pedestrian safety and reduce traffic speed within the village will be supported, including support for the design of large developments as 20 mph zones.</p> <p>Could we alter the wording to allow more 20mph zones to be proposed i.e. through the length of Main street and Station Road so as to deter traffic cutting through that way when Broughton Way is congested at peak times.</p> <p>Suggestion</p> <p>Measures to improve pedestrian safety and reduce traffic speed within the village will be supported, including support for 20mph zones particularly in new large developments.</p>		
	8.1.6	Policy 16	Proposals for the expansion of educational facilities in the Parish will be supported where it can be demonstrated that:	Agreed	Change to be made as indicated.



			<p>a) expansion would not exacerbate existing access related or traffic circulation problems, unless suitable mitigation measures are brought forward as part of the proposal;</p> <p>Should this be to?</p>		
	8.1.7	Policy 17	<p>I saw a comment at the consultation about the wording being out of date. Possibly worth asking the best phraseology now.</p>	<p>Agreed. The policy wording will be updated to refer to gigabit capable full-fibre broadband.</p>	<p>Change to be made as indicated.</p>
		Page 36	<p>Developer contributions towards the provision of a medical centre have been secured. To benefit from these contributions, the healthcare facility needs to be provided by 15 May 2031.</p> <p>Discussion with the East Leicestershire & Rutland Clinical Commissioning Group are ongoing regarding the delivery of a new healthcare centre.</p> <p>Can we add this the opening sentence to</p> <p>Developer contributions towards the provision of a medical centre have been secured and are held by Harborough District Council. To benefit from these contributions, the healthcare facility needs to be provided by 15 May 2031.</p>	<p>Agreed</p>	<p>Change to be made as indicated.</p>



	8.1.9			<p>A Community Building would be an asset for teenagers and young adults to meet and socialise in a safe environment. There is a distinct drop off of available provision following school age to mid-twenties especially around SEN residents whose access to services finishes at the age of 18.</p> <p>This section seems to be left hanging as it does not have a policy but the proposed action is covered in Policy 19: Infrastructure.</p> <p>Can we add a sentence saying “policies relating to the provision of Youth facilities are included in Policy 19 below.”</p>	Agreed	Change to be made as indicated.
	9			<p>The creation of a new footway/cycleways to encourage pedestrian and cycle use, including a footway/cycleway alongside the B581 Broughton Way. to encourage pedestrian and cycle use</p> <p>Full stop should be at the end of the sentence.</p> <p>In this section there is a mixture of ; and . at the end of each bullet point. (Note I could not copy the format easily hence plain text is shown below.)</p>	<p>Agreed</p> <p>Noted. A consistent approach will be adopted.</p>	<p>Change to be made as indicated.</p> <p>Agreed Change to be made as indicated.</p>



				<p>Sport and recreation facilities at the Community Hub Leisure Centre site including a swimming pool and an extension to the leisure centre car park;</p> <p>The improvement of facilities at Frolesworth Road Recreation Ground;</p> <p>Recreation facilities accessible and suitable for all ages.</p> <p>A Community Building for young people.</p> <p>The creation of a new footway/cycleways to encourage pedestrian and cycle use, including a footway/cycleway alongside the B581 Broughton Way. to encourage pedestrian and cycle use</p> <p>Health care at the Community hub Leisure Centre site (see policy 18) or in the current Village Centre location.</p> <p>The improvement, remodelling or enhancement of education facilities at Hallbrook, Old Mill and Orchard Primary Schools, Thomas Estley Community College Broughton Astley Community Library lending stock plus reference, audio visual and homework support material;</p> <p>The extension of the existing Rights of Way networks to include along the former Midland Counties Railway line;</p>		
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				Community infrastructure improvements including the provision of parish notice boards, defibrillator equipment, seats, bus shelters, litter bins and grit bins; footpaths and Village Centre improvements to promote foot fall, access to shops and amenities.		
	10.2	Page 43		Figure 6 Map pf open space Western Willows is not highlighted on the map like the rest. It is numbered but less easy to find due to lack of highlight	Western Willows allotments 016 is shaded yellow already on fig 6	None
	10.3			A group of sites scores highly in the inventory for 'wildlife' (scoring at least 3/5 under this criterion). Suggest the sentence opens with These are a group of sites which score highly in the inventory for 'wildlife' (scoring at least 3/5 under this criterion).	Agreed	Change to be made as indicated.
	10.5			Sutton in the Elms or Sutton in-the-elms? The road signs have the hyphens but in various online references it is plain text. Do we want to be consistent with the road signs?	Agreed	Change to be made as indicated.



	10.7	Policy 26		<p>Suggest the sequence of sentences is reversed with the last one coming first as shown below.</p> <p>Development proposals should not adversely affect the habitat connectivity provided by the wildlife corridor identified in figure 10.</p> <p>All new development proposals will be expected to safeguard habitats and species across the Plan Area, including those of local significance, and to deliver biodiversity net gain. If significant harm to biodiversity cannot be avoided (through relocating to an alternative site with less harmful impacts), adequately mitigated, or dealt with through onsite or offsite enhancement (via biodiversity net gain at 10%), planning permission should be refused, in conformity with paragraph 193a of the NPPF (December 2024).</p>	Agreed	Change to be made as indicated.
		Page 66		<p>Question Only</p> <p>We know there will be Local Government reorganisation (LGR) at some stage and HDC absorbed into the new authority. Is there any benefit somewhere in the document having a reference statement saying something like</p> <p>In the event of Local Government Reorganisation and Harborough District Council being absorbed into a new</p>	Agreed	Change to be made as indicated.



				structure, the alignment of policies and obligations of HDC will be transferred.		
14			Resident			
	General			I support the proposed neighbourhood plan	Noted	None
15			Resident			
				I support the proposed neighbourhood plan	Noted	None
16			Resident			
	4.4	Policy 2		Crucial to treat land outside Limits of Development as open countryside.	Noted	None
	10	Policies 20, 21,22, 23, 25,26,27 28, 29, 30,31,		<p>I approve of the protection of our natural environment, countryside, rights of way, biodiversity, habitat, tree, hedgerows, the need to prevent flooding, protection of sites of historical and environmental significances.</p> <p>With regard to the above – we need to be able to protect the Parish from unsuitable development – such as proposed building on Frolesworth Road – outside Limits of Development, on land prone to flooding and which would undoubtedly cause serious flooding issues and worsen traffic problems – especially concerning Bull’s Head crossroads.</p>		



	4.5.2	Policy 5		We do not need further large, detached housing. Affordable homes for young people are what is needed. I approve of the provision for young people with a connection, family ties within the Parish.	Noted	None
	9	Policy 19		Swimming pool, extension to carparking at Leisure Centre – much needed Health hub – excellent idea. Youth opportunities – more provision would be good. Extension of Rights of Way, preservation of green spaces – desirable. Village Centre improvements - desirable	Noted	None
17			Gladman			
	General			Gladman notes that the evidence base for the draft BANP Review proposes an allocation of 138 dwellings to the north of the settlement. The consultation is supported by a Strategic Environmental Assessment (SEA) Screening Opinion, which was published in June 2025. The SEA screening assessment states that it is unlikely there will be any significant environmental effects arising from the BANP, therefore a full Strategic Environmental Assessment of the BANP is not required.	Noted Noted	None None



			<p>Gladman respectfully disagrees with this conclusion.</p> <p>The SEA is a legal requirement and must be applied where a plan sets the framework for future development consent and is likely to have significant environmental effects. The SEA process is required to be iterative and proportionate, and must consider reasonable alternatives, including different site options, spatial strategies, and quantum of development, particularly where a plan proposed site allocations.</p> <p>Gladman dispute the conclusion of the SEA and recommend that a full SEA is undertaken to consider reasonable alternatives.</p> <p>As drafted, the BANP cannot demonstrate that it represents the most sustainable option, raising concerns in respect of compliance with Basic Condition (f).</p>	<p>Noted. However, the Screening Assessment was undertaken by the local planning authority who are experienced in these matters, and the recommendation agreed by the consultation bodies.</p>	None
	3		<p>Gladman support the Plan’s vision which seeks to ensure Broughton Astley continues to thrive as a vibrant and distinctive village which continues to evolve and expand while retaining its unique and distinctive character, and to provide an outstanding quality of life for current and future generations of residents.</p> <p>Gladman reiterate to Broughton Astley Parish Council the growing housing need within the Harborough authority must be supported through the neighbourhood plan, therefore</p>	<p>Noted. The Neighbourhood Plan exceeds the minimum housing requirement as set by HDC and therefore contributes significantly towards meeting</p>	None



				should ensure they review their vision “new housing meets local needs” to support the wider authority.	the District’s housing need.	
	4.3	Policy 1		<p>Gladman support the principle of Policy 1, which helps provide a robust housing supply to help meet the requirement set out within the Harborough Local Plan. The draft BANP allocates a further 138 dwellings to the settlement, this number being on top of the 475 dwellings currently allocated to the settlement through the emerging Harborough Local Plan, which would result in an oversupply of housing for the settlement.</p> <p>Gladman acknowledges that the emerging Harborough Local Plan proposes a strategic allocation to the south of Broughton Astley and understands the Parish Council’s rationale for identifying a smaller-scale site through the Neighbourhood Plan. However, the BANP Review fails to assess or justify any other sites, in particular those which have gained a positive SHELAA assessment through the HDC call for sites exercise.</p> <p>It is recommended that the Neighbourhood Plan considers the suitability of sites that have been positively assessed through the call for sites exercise in 2024, allowing a complete assessment of each site and their constraints to be carried out. Completing this exercise would allow a clear judgement of sites to be made, considering any potential</p>	This is incorrect. Alternative sites were assessed and the allocated site best meets local needs.	None



				<p>constraints, issues with deliverability, and a clear timeframe for the site to be developed.</p> <p>Additionally, Gladman notes the policy states for housing developments to be located within the settlement boundary. To expect future growth of the scale required within the tier 3 settlement to be located within the confined settlement boundary is not realistic nor achievable. The Neighbourhood Plan acts as red tape towards the future growth of the settlement, and greenfield land outside of the settlement boundary will be needed in order to meet the Local Housing Need. Again, Gladman considers the Neighbourhood Plan to not be in conformity with the adopted development plan for this reason and therefore will be found unsound.</p>	<p>The Limits to Development are appropriately drawn to accommodate local need.</p>	<p>None</p>
	4.4	Policy 2		<p>Gladman objects to Policy 2, which defines and limits the development boundary set out within figure 3. Whilst the map includes allocation within the neighbourhood plan, it is drawn up in a manner that significantly restricts the potential for additional housing to come forward in accordance with strategic requirements.</p> <p>The limits to development boundary have not been informed by a robust assessment of reasonable site alternatives, nor is it supported by the Strategic Environmental Assessment process. As a result, the boundary appears to reflect the proposed allocation rather</p>	<p>Agreed. We will add the sentence 'The settlement boundary does not apply to land allocated for strategic development in the Harborough Regulation 19 Local Plan (Policy SA01). Development in</p>	<p>Changes to be made as indicated.</p>



				<p>than forming part of a positively prepared and evidence-led spatial strategy.</p> <p>The emerging plan for Harborough is in an advanced stage of the plan making process and is due to be submitted early 2026. The draft allocation within this plan is not included within BANP limit to development, and areas to meet the 475 homes are very limited.</p> <p>In this context, the limits to development boundary risks constraining the delivery of sustainable development and failing to meet Basic Condition (e), as it is not in general conformity with the strategic policies of the development plan. Gladman therefore recommends that the boundary is reviewed and expanded to allow sufficient flexibility to accommodate the settlement’s strategic housing role.</p> <p>Gladman therefore recommends the boundary for the limit to development is expanded to allow for the emerging housing requirement to be met.</p>	<p>this area will be guided by the Local Plan and an approved masterplan’.</p>	
	10.7	Policy 26		<p>Gladman supports the overarching objective of Policy 26 in seeking to protect and enhance biodiversity and maintain habitat connectivity within and around Broughton Astley. The importance of biodiversity net gain and the protection of ecological networks is fully recognised and is supported by national policy.</p>	<p>We disagree. Policy 26 is no more restrictive than the relevant NPPF policy; similarly worded policies have passed</p>	None



			<p>However, Gladman considers that the current wording of Policy 26 risks applying biodiversity constraints in an overly restrictive manner, which may unintentionally limit the delivery of sustainable development within the settlement.</p> <p>Within National Policy, it is clear that biodiversity net gain must be addressed through a balanced and evidence-led approach, allowing development to come forward where impacts can be appropriately avoided, mitigated and compensated. This includes the use of site-specific ecological assessments, mitigation strategies, and biodiversity net gain measures secured through the planning process.</p> <p>Gladman considers that Policy 26 should avoid imposing blanket constraints which effectively preclude development across large areas without a site-specific assessment, and allow flexibility for development proposals to demonstrate, through appropriate evidence, that biodiversity impacts can be addressed.</p>	Examination in numerous other Neighbourhood Plans	
10.9	Policy 28		<p>Gladman supports the overarching objective of Policy 28 in seeking to ensure that development does not result in unacceptable climate change or flood risk impacts and that appropriate mitigation measures are secured. These principles are consistent with national policy and are supported.</p>	We disagree. Policy 28(i) applies the principle of 'adding local detail' to the strategic-level policy in the Local	None



			<p>However, Gladman has concerns with the requirement that development proposals located in areas susceptible to flooding must demonstrate that no alternative sites are available to meet local residential development needs. This approach applies a strategic site selection test at neighbourhood plan level and places an unreasonable evidential burden on individual development proposals.</p> <p>Matters relating to flood risk, site suitability and the sequential approach are more appropriately addressed through plan-making at Local Plan level, or through site-specific assessment at application stage, informed by detailed Flood Risk Assessments. Applying such a test through the Neighbourhood Plan risks constraining the delivery of sustainable development and is not supported by national policy or Planning Practice Guidance.</p> <p>Furthermore, the requirement has not been informed by a robust assessment of reasonable alternatives through the SEA process. In the absence of such assessment, it is not possible to conclude that the policy represents a proportionate or justified approach to managing flood risk.</p> <p>As drafted, Policy 28 therefore risks failing to meet Basic Conditions (a), (d) and (e). Gladman recommends that the policy is amended to rely on established national and local policy mechanisms for assessing flood risk, rather than introducing additional plan level tests.</p>	<p>Plan. It provides a one-sentence distillation of the requirements in the relevant NPPF 2024 paragraphs in respect of the relationships between flood-risk assessments (which must be provided as evidence in all applications) and the sequential and exception tests.</p>	
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	4			<p>The site is located to the south of Coventry Road to the west of the settlement. Measuring circa 22 hectares, the site is bound by built development to the east, open countryside to the south, the River Soar and the Mill on the Soar Hotel to the west, and emerging commercial development to the north (21/01803/REM and 24/00528/OUT). The site is a logical extension to Broughton Astley, allowing new and existing residents to access the strategic road network without travelling through the village centre.</p> <p>Most of the site in Flood Zone 1. The western boundary is within Flood Zones 2 and 3, associated with the River Soar in this location. No built form will be proposed within this location, and the land will remain as functional flood land and open space. This will also serve to provide a soft edge to the development.</p> <p>The are no heritage assets on the site or adjacent to the site. The closest Listed Buildings are the Grade II Baptist Chapel, Quaker Cottage and The Stone House. These are located north of Broughton Way, off Sutton Lane and are well screened from the development site.</p> <p>Pylons run across the site from the north western corner to the south eastern corner. These will be retained on site and the required swing distances will be incorporated into the masterplan. This area will create a significant area of public open space in the centre of the site that will provide connections to the existing Public Right of Way network.</p>	<p>Noted. This site is not favoured locally and is not supported as an allocation within the Neighbourhood Plan.</p>	None
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				<p>A range of services and facilities are located within walking distance of the site, including but not limited to pubs, a supermarket, medical centre, a small selection of shops, restaurants and takeaways, Orchard, CofE primary school and a nursery. Therefore, this is a highly sustainable location for growth that will reduce the reliance on the private car when residents meet their day-to-day needs.</p> <p>The site south of Coventry Road was submitted to Harborough Borough Council call for sites, which opened on the 16th of January 2024, and was considered under reference 24/10135 and 24/12226 within the 2024 SHELAA. The SHELAA concluded the deliverability of the site for mixed use development.</p> <p>Gladman consider that the BANP site options and assessment paper is insufficient given that all the sites suitable for development have not been assessed. Further assessment work should be completed.</p>		
18			National Highways	No comment to make	Noted	None
19			DLP Planning Ltd (Lagan Homes Ltd)			
		Policy 1		Supporting text of Policy 1 under section 4.3 states:	Noted	None



			<p><i>“As part of the preparation of the Review Neighbourhood Plan, a comprehensive site assessment process was undertaken by AECOM. The outcome is attached as Appendix B. As a result of the process, a single site is allocated in the Neighbourhood Plan for residential development, namely additional development at Witham Villa (figure 2). The allocation through the Neighbourhood Plan of an additional site to that allocated through the Local Plan will help ensure that as the housing requirement for the Neighbourhood Area changes over the Plan Period, sufficient provision is made locally to meet a local housing need in a locally appropriate location.”</i></p> <p>The AECOM assessment considered a total of 19 sites initially identified through the Harborough District Council SHELAA and BAPC’s call for sites, ultimately identifying 11 as suitable for development and available. From these, 3 were ultimately deemed appropriate for allocation. Site 21/8045 (NP01) Land to the east of Broughton Chase which forms the site now subject to ongoing application 25/01236/FUL forms one of those deemed suitable for allocation by the AECOM assessment, it concluding that: “The SHELAA conclusions are reasonable and supported by the available evidence and can therefore be applied to the NP assessment. It is noted that there could be ecological value within the site which needs to be considered”.</p> <p>Despite the identification of four sites suitable for allocation, the draft Neighbourhood Plan seeks to allocate a single site</p>			Noted	None
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				<p>only for residential development, comprising 138 dwellings at Witham Villa as highlighted by the above copied supporting text. Policy wording therefore, relates solely to this site.</p> <p>It is not clear from the AECOM Site Options and Assessment and Neighbourhood Plan consultation material why the site at Crowfoot Way (8045/NP01) was discounted from allocation given that it was assessed to be suitable for development. However, supporting information associated with the draft Neighbourhood Plan includes a ‘Statement to Support Housing Development Allocation in the Neighbourhood Plan’. This sets out the BAPC’s rationale for allocation of the Witham Villa site as follows:</p> <p><i>“Following this comprehensive appraisal, the Witham Villa site was identified as the most suitable and sustainable location for future development. It demonstrated strong performance across the assessment criteria and demonstrated a balanced potential for medium scale development aligned well with the community feedback gathered during consultation. Key criteria included infrastructure readiness such as road network and traffic control on to the B581, its close proximity to existing amenities and local schools and was felt to have the least impact on the village centre. Selecting this site for inclusion in the revised NHP ensures that future growth is planned, coordinated, and sensitive to the character and needs of Broughton Astley.”</i></p>	<p>The site selected as an allocation is deemed to be the most suitable and has community support.</p> <p>Allocating a single site is preferred to the dispersal approach suggested here.</p> <p>The stated benefits of the Lagan Homes site are noted, but the NP allocation remains as published.</p>	
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			<p>Accordingly, BAPC’s decision to allocate the single site in addition to that allocated through the local plan is stated to be centred upon a balance of performance against assessment criteria and local feedback. However, our client wishes to highlight that taking an approach which seeks to allocate a single, large site within the Neighbourhood Plan area presents concerns that should be considered carefully.</p> <p>This approach concedes a robust and dispersed housing delivery strategy, relying solely on a single point of provision, which may or may not be subject to unforeseen issues or delays in delivery. A dispersed allocation strategy that identifies a small number of sites across the plan area distributes development risk, (and benefits) more evenly across the village area, and would thus provide greater certainty to the Parish that local housing needs will be met across the plan period alongside the Borough Council allocation.</p> <p>A dispersed approach to allocation also acts to limit localised Impacts associated with development, potential disruption and disturbance to the surrounding localities in terms of factors including traffic movements, infrastructure works and construction noise. Furthermore, this representation highlights that site 8045/NP01 remains a strong candidate for neighbourhood plan allocation, notwithstanding the ongoing planning application at the site.</p> <p>As a smaller scale development proposal of 30 units, the site is deliverable in the short to medium term, acting to displace</p>		
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			<p>housing delivery evenly across the plan period, and as a smaller scale development is less likely to encounter significant or time intensive barriers to dwellings coming forward when compared to a larger scale scheme. Fundamentally, given the need to ensure a good supply and deliverability there is a need for sites of varying sizes to come forward across the plan period, including those ranging from small to medium scale.</p> <p>8045/NP01 also forms a logical and sustainable infill development proposition given its position directly adjoining existing development off Crowfoot Way, and direct connectivity with the road/footpath network associated with existing residential development in this location at the southern edge of the village area.</p> <p>Development of the site would not significantly extend the built settlement area outside of its existing confines and into the open countryside, instead developing a modest and contained parcel of land. Development in this location would thus respect what effectively forms the rural edge of the settlement, a matter again referred to in relation to Policy 2.</p> <p>The nearest bus stops to the site are located approximately 650m from the site on Brye Crescent. These stops are served by the number 84 Leicester – Lutterworth hourly service in both directions and the LC14 Hinckley – Fosse Park infrequent service. The site is within a similar walking distance to a convenience store and</p>		
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			<p>takeaways with Hallbrook Primary School under 500m walk away. It immediately adjoins and is linked (though the existing Public Rights of Way) to existing built form to the west, north and north-east. These factors indicate that the site remains a sustainable proposition for development, cited as a key consideration within the Parish Council's Statement to Support Housing Development Allocation in the Neighbourhood Plan.</p> <p>Alongside the siting and development suitability assessment criteria examined across the Harborough Borough SHELAA and AECOM Site Options and Assessment, the progression of a planning application at the site has now provided greater certainty in terms of relevant technical considerations that may otherwise frustrate or delay development coming forward.</p> <p>Whilst the site assessment report highlights the potential presence of ecological value to be considered on site, supporting works associated with the ongoing planning scheme indicate that the site is of low wildlife interest and is not botanically diverse, with no rare or notable vascular plants recorded as present. Specifically, the site was deemed sub-optimal for reptiles/amphibians including great crested newt, and no evidence of badgers was recorded. Whilst boundary hedgerows indicated potential for presence of nesting birds, these are not to be adversely impacted or lost in association with the current development proposal at the site.</p>		
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			<p>The site is in Flood Zone 1 and has very limited risk of surface water flooding on the 1 in 30, 1 in 100 and 1 in 1000 annual likelihood of flooding metrics. This is reflected in LLFA response to the ongoing application in the form of no objection to development.</p> <p>In relation to transport impacts and infrastructure, the Local Highway Authority have indicated in relation to the planning proposal that the development will not exacerbate any known highway safety issues and have not raised objection in relation to any adverse impacts on the wider highway network. Again, this highlights that the development of this site would align with the Parish Council's stated criteria for site allocation selection through a demonstrable infrastructure readiness in relation to the highway network.</p> <p>Finally, draft Heads of Terms associated with the ongoing application indicate the applicant intends to offer appropriate policy compliant contributions to service and infrastructure enhancement within the village in terms of education, library facilities, healthcare, and community facilities where such need is present and demonstrable. The ongoing planning scheme is also proposed to include a 40% affordable housing provision.</p> <p>Overall therefore it is submitted by this representation the approach to site allocation adopted by the Neighbourhood Plan should be reconsidered, and that site 8045/NP01 should be considered for formal allocation through the Neighbourhood plan.</p>		
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		Policy 2		<p>Policy 2 has been introduced to the draft plan with the stated purpose of defining the extent of built-up settlement. This approach seeks to allow for a clear distinction to be drawn between proposals to be considered to be within the village or the open countryside for the purposes of assessing the principle of development in planning terms.</p> <p>In broad terms our client supports this approach in that it seeks to clearly delineate areas deemed to lie within the settlement envelope of the village and thus provide a greater degree of certainty for prospective development schemes within the plan area. Most notably, the limits to development defined under figure 3 associated with the policy indicates that our Client's application site at 8045/NP01 falls within the settlement envelope, which follows the southern boundary of existing development off Crowfoot Way.</p> <p>This is considered a rational and practical definition of the southern edge of the settlement area given existing development in place and the building footprints to the west of the aforementioned application site. As outlined above, this site forms a logical and sustainable infill location given its position directly adjoining existing development off Crowfoot Way, that respects the built settlement edge and would not encroach into the wider open countryside, instead developing a contained parcel of land directly associated with existing residential form.</p>	Noted	None



				As such this representation supports the introduction of this policy and the settlement edge as defined based upon the methodology outlined within its supporting text. The proposed policy wording which directs that development proposals will be supported in principle on sites falling within the limits to development illustrated where in compliance with other policies of the plan is therefore supported by this representation.		
		Policy 3		<p>Policy H3 of the adopted neighbourhood plan has been updated within the draft as Policy 3 – Windfall Development. The revised wording and approach of this policy is broadly supported by this representation in that the draft policy wording adopts a more balanced approach to identifying infill and redevelopment sites within the limits to development defined by Policy 2.</p> <p>It is, however, recorded that policy wording that refers to residential development on “infill and redevelopment sites” is a material shift from its previous allowance for development on “previously developed ‘brownfield’ or unallocated sites with direct highways access” and is less specific in terms of definition with a broader scope for interpretation, despite the clarification under point a. that a development site will meet this definition where it <i>“Comprises a restricted gap in the continuity of existing frontage buildings or on other sites within the built-up area of Broughton Astley or where the site is closely surrounded by existing buildings”</i>.</p>	Noted. We consider the policy wording to be appropriate.	None



				<p>This representation recommends and requests that this wording is reconsidered to incorporate provision for prospective development that is well located within the village area and would readily fit into the existing urban fabric of the settlement without creating a risk of wider sprawl or encroachment into the surrounding open countryside. The addition of wording to the effect of “and where directly adjacent to and accessed through the existing built-up area” would effectively address this.</p> <p>The Draft Neighbourhood Plan is broadly supported as being in accordance.</p>		
20			LCC Dept Public Health, Law and Governanc e			
	General			<p>General Comments</p> <p>The County Council recognises that residents may have concerns about traffic conditions in their local area, which they feel may be exacerbated by increased traffic due to population, economic and development growth.</p> <p>Like very many local authorities, the County Council’s budgets are under severe pressure. It must therefore</p>	These general comments which are not related to the Broughton Astley NP Review are noted.	None



			<p>prioritise where it focuses its reducing resources and increasingly limited funds. In practice, this means that the County Highway Authority (CHA), in general, prioritises its resources on measures that deliver the greatest benefit to Leicestershire's residents, businesses and road users in terms of road safety, network management and maintenance. Given this, it is likely that highway measures associated with any new development would need to be fully funded from third party funding, such as via Section 278 or 106 (S106) developer contributions. I should emphasise that the CHA is generally no longer in a position to accept any financial risk relating to/make good any possible shortfall in developer funding.</p> <p>To be eligible for S106 contributions proposals must fulfil various legal criteria. Measures must also directly mitigate the impact of the development e.g. they should ensure that the development does not make the existing highway conditions any worse if considered to have a severe residual impact. They cannot unfortunately be sought to address existing problems.</p> <p>Where potential S106 measures would require future maintenance, which would be paid for from the County Council's funds, the measures would also need to be assessed against the County Council's other priorities and as such may not be maintained by the County Council or will require maintenance funding to be provided as a commuted sum.</p>		
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				<p>In regard to public transport, securing S106 contributions for public transport services will normally focus on larger developments, where there is a more realistic prospect of services being commercially viable once the contributions have stopped ie they would be able to operate without being supported from public funding.</p> <p>The current financial climate means that the CHA has extremely limited funding available to undertake minor highway improvements. Where there may be the prospect of third-party funding to deliver a scheme, the County Council will still normally expect the scheme to comply with prevailing relevant national and local policies and guidance, both in terms of its justification and its design; the Council will also expect future maintenance costs to be covered by the third-party funding. Where any measures are proposed that would affect speed limits, on-street parking restrictions or other Traffic Regulation Orders (be that to address existing problems or in connection with a development proposal), their implementation would be subject to available resources, the availability of full funding and the satisfactory completion of all necessary Statutory Procedures.</p>		
	10.9	Policy 28		<p>“SuDS (Sustainable drainage solutions) should ensure that the peak rate of run-off over the lifetime of the development, allowing for climate change, is no greater for the developed site than it was for the undeveloped site”</p>	Noted. Recent updates to the Environment Agency metrics and mapping will	Changes to be made as indicated.



			<ul style="list-style-type: none"> • This conflicts with the draft Harborough Local Plan which requires peak runoff to be limited to the Qbar greenfield rate minus 20% • Please ensure this requirement for betterment is included within the Neighbourhood Plan. <p>Several references to ‘Flood Risk Zone’ 1, 2, 3 etc. Please amend to just ‘Flood Zone’.</p> <p>“Land and property in Flood Zone 1 have a low probability of flooding”</p> <ul style="list-style-type: none"> • Suggest the plan states flooding specifically from rivers (and seas) when referring to Flood Zones, as much of Broughton Astley that has suffered devastating surface water flooding is within Flood Zone 1. <p>“...the impact of new development with less than adequate sustainable drainage (SUDS).”</p> <ul style="list-style-type: none"> • The Local Lead Flood Authority (LLFA) has no records of any recent development being constructed with inadequate SuDS. Please remove this line as it appears to be speculation therefore not an appropriate comment for a policy document without evidence. • Issues at Fretter Close and Blockley Road are not due to inadequate SuDS, they are due to development being constructed in a surface water flow path without adequate 	<p>be incorporated as appropriate.</p>	
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			<p>consideration of routing of surface water flow routes (which originate from outside of the development) through the site (pre-LLFA as a statutory consultee). Flooding issues at Frolesworth Road/Jubilee Road are not affected by any new development and have occurred persistently since at least 1955.</p> <ul style="list-style-type: none">• Include draft Harborough Local Plan policy under (iii) - “for all development (including brownfield), demonstrate that the peak surface water runoff rate is limited to the Qbar greenfield rate (minus 20%), or to a rate which mitigates the risk of blockage, whichever is greater.”• Consider including a reference for SuDS to be designed and constructed in accordance with the 2025 published national standards for sustainable drainage systems (SuDS) - https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds. <p>Other comments:</p> <ul style="list-style-type: none">• The LLFA has received several reports of flooding from the foul infrastructure near Sutton in the Elms, near the wastewater treatment works. We advised Harborough District Council that foul capacity should be considered as part of the Infrastructure Delivery Plan which supports the Local Plan. Given the potential impact that additional		<p>Agreed. Reference will be made in Policy 19.</p>	<p>Change to be made as indicated</p>
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			<p>housing will have on the existing strategic foul infrastructure, it is recommended that specific reference is made to foul flooding and infrastructure capacity within the Broughton Astley NP.</p> <ul style="list-style-type: none">• The LLFA are expected to publish two flood investigations in 2026, featuring communities within Broughton Astley under Section 19 (S19) of the Flood and Water Management Act 2010. A S19 for Storm Henk on 2nd January 2024 includes the flooding at Fretter Close and a S19 for 6th January 2025 flooding will include Frolesworth Road as well as an expanded section on Fretter Close which will include Blockley Road. <p>General Comments Leicestershire County Council are fully aware of flooding that has occurred within Leicestershire and its impact on residential properties resulting in concerns relating to new developments. As the Lead Local Flood Authority (LLFA) we undertake investigations into flooding, review consent applications to undertake works on ordinary watercourses and carry out enforcement where lack of maintenance or unconsented works has resulted in a flood risk. In April 2015 the LLFA also became a statutory consultee on major planning applications in relation to surface water drainage and have a duty to review planning applications to ensure that the onsite drainage systems are designed in accordance with current legislation and guidance. The LLFA also ensures that flood risk to the site is accounted for when designing a drainage solution.</p>	<p>Noted</p> <p>These general comments which are not related to the Broughton Astley NP Review are noted.</p>	<p>None</p> <p>None</p>
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			<p>The LLFA is not able to:</p> <ul style="list-style-type: none">• Prevent development where development sites are at low risk of flooding or can demonstrate appropriate flood risk mitigation.• Use existing flood risk to adjacent land to prevent development.• Require development to resolve existing flood risk. <p>When considering flood risk within the development of a neighbourhood plan, the LLFA would recommend consideration of the following points:</p> <ul style="list-style-type: none">• Locating development outside of river (fluvial) flood risk (Flood Map for Planning (Rivers and Sea)).• Locating development outside of surface water (pluvial) flood risk (Risk of Flooding from Surface Water map).• Locating development outside of any groundwater flood risk by considering any local knowledge of groundwater flooding.• How potential SuDS features may be incorporated into the development to enhance the local amenity, water quality and biodiversity of the site as well as manage surface water runoff.		
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			<ul style="list-style-type: none">• Watercourses and land drainage should be protected within new developments to prevent an increase in flood risk. <p>All development will be required to restrict the discharge and retain surface water on site in line with current government policies. This should be undertaken through the use of Sustainable Drainage Systems (SuDS). Appropriate space allocation for SuDS features should be included within development sites when considering the housing density to ensure that the potential site will not limit the ability for good SuDS design to be carried out. Consideration should also be given to blue green corridors and how they could be used to improve the biodiversity and amenity of new developments, including benefits to surrounding areas.</p> <p>Often ordinary watercourses and land drainage features (including streams, culverts and ditches) form part of development sites. The LLFA recommend that existing watercourses and land drainage (including watercourses that form the site boundary) are retained as open features along their original flow path and are retained in public open space to ensure that access for maintenance can be achieved. This should also be considered when looking at housing densities within the plan to ensure that these features can be retained.</p>		
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			<p>Leicestershire County Council, in its role as LLFA, will not support proposals contrary to Council policies.</p> <p>For further information it is suggested reference is made to:</p> <p>National Planning Policy Framework (NPPF)</p> <p>House of Commons: Written Statement (HCWS161)</p> <p>Planning practice guidance - flood risk and coastal change</p> <p>National standards for sustainable drainage systems (SuDS)</p> <p>Flood risk mapping is readily available for public use at the links below. The LLFA also holds information relating to historic flooding within Leicestershire that can be used to inform development proposals.</p> <p>Risk of flooding from surface water map: https://www.gov.uk/check-long-term-flood-risk</p> <p>Flood map for planning (rivers and sea): https://flood-map-for-planning.service.gov.uk/</p>		
			<p>Public Rights of Way</p> <p>Leicestershire has an extensive network of Public Rights of Way which are key to allow people to explore the local countryside, link communities and give access to schools,</p>	<p>These general comments which are not related to the Broughton</p>	<p>None</p>



			<p>shops, work and facilities. Public Rights of Way are recorded on the Definitive Map and a version of this can be viewed at: https://www.leicestershire.gov.uk/roads-and-travel/cycling-and-walking/where-to-walk-in-leicestershire</p> <p>Public Rights of Way are a material consideration in the determination of Planning applications. National Planning Policy Framework states that “Planning policies and decisions should protect and enhance Public Rights of Way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks...”. Leicestershire County Council will expect that where Public Rights of Way are impacted by development consideration is given not just to replacement or reinstatement but enhancement of the provision.</p>	<p>Astley NP Review are noted.</p>	
			<p>Planning Minerals & Waste Planning</p> <p>The County Council is the Minerals and Waste Planning Authority; this means the council prepares the planning policy for minerals and waste development and also makes decisions on mineral and waste development. Although neighbourhood plans cannot include policies that cover minerals and waste development, it may be the case that your neighbourhood contains an existing or planned minerals or waste site. The County Council can provide information on these operations or any future development planned for your neighbourhood. You should also be aware of Minerals and Waste Safeguarding Areas, contained</p>	<p>These general comments which are not related to the Broughton Astley NP Review are noted.</p>	<p>None</p>



				<p>within the adopted Minerals and Waste Local Plan (Leicestershire.gov.uk). These safeguarding areas are there to ensure that non-waste and non-minerals development takes place in a way that does not negatively affect minerals resources or waste operations. Neighbourhood plan groups should check all proposed site allocations and policy areas against these safeguarding areas by reviewing the relevant 'District councils' minerals and waste safeguarding' map. The County Council can provide guidance on this if your neighbourhood plan is allocating development in these areas or if any proposed neighbourhood plan policies may impact on minerals and waste provision.</p>		
				<p>Property Education</p> <p>Whereby housing allocations or preferred housing developments form part of a Neighbourhood Plan the Local Authority will look to the availability of school places within a two-mile (primary) and three-mile (secondary) distance from the development. If there are not sufficient places, then a claim for Section 106 funding will be requested to provide those places. It is recognised that it may not always be possible or appropriate to extend a local school to meet the needs of a development, or the size of a development would yield a new school. However, in the changing educational landscape, the Council retains a statutory duty to ensure that sufficient places are available in good</p>	<p>These general comments which are not related to the Broughton Astley NP Review are noted.</p>	<p>None</p>



				schools within its area, for every child of school age whose parents wish them to have one.		
				Strategic Property Services No comment at this time.	Noted	None
				Adult Social Care It is suggested that reference is made to recognising a significant growth in the older population and that development seeks to include bungalows etc of differing tenures to accommodate the increase. This would be in line with the draft Adult Social Care Accommodation Strategy for older people which promotes that people should plan ahead for their later life, including considering downsizing, but recognising that people's choices are often limited by the lack of suitable local options.	These general comments which are not related to the Broughton Astley NP Review are noted.	None
		Policy 29		Archaeology and the Historic Environment Specific Comments: Sites of Historic Environment Significance (p57 & fig12 + Appendix D) The first entry in the Inventory (Map ref 001) is for St Mary's Churchyard. It scores 5 for significance (the highest score) but is not included in the map (fig 12) which lists the sites recognised as of historic environment significance.	Figure 12 shows non-designated (non-statutory) sites and features. St Mary's church (shown on figure 13) is Listed and	None



				<p>The burial ground for the C18th Baptist Church has also been left off the list (Map are 014, Appendix D). It has a score of 3.</p> <p>Iron Age occupation site (map ref 314) is marked on Fig12, but the label has been omitted (should read MLE17713)</p>	<p>its setting (including the churchyard) is considered to be protected at national level – inclusion under Policy 29 could introduce a duplication.</p> <p>As previous</p> <p>Agreed</p>	<p>None</p> <p>Change to be made</p>
		Policy 30		<p>Non-designated Heritage Assets (p61 & Fig14)</p> <p>Six buildings in Broughton Astley are Listed with statutory protections and a further 12 buildings noted as non-designated heritage assets. There is no Conservation Area.</p> <p>No buildings that are not already on the Historic Environment Record (HER) are identified as non-designated heritage assets in this Review.</p>	<p>Noted. The Qualifying Body considers that all relevant buildings are recorded in the HER.</p>	<p>None</p>



			<p>It should be emphasised that the HER is not a comprehensive list of all historic buildings and local input into the Neighbourhood Plan can be an opportunity to enhance protection for locally valued heritage assets. A cursory glance at historic mapping suggests more buildings could be considered for inclusion as heritage assets. The illustrations below show some examples of buildings that have not been specifically identified for protections on a neighbourhood plan but have merit in shaping the historic character of Broughton Astley.</p> <p>Further candidates that might be considered include:</p> <ul style="list-style-type: none">• The Old Farmhouse, 65 Old Mill Road, Broughton Astley• 8-16 Green Road, Primethorpe/Thorpe – a collection of C19th shop, cottages and workshops, plus a traditional cobbled lane• 62 Main street, Broughton Astley• 56-60 Main Street, Broughton Astley• 5 Leicester Road, Broughton Astley – L19th C detached house• 7-9 Leicester Road, Broughton Astley – terrace, as above• 11 Leicester Road, Broughton Astley – Bees Cottage L19th C detached cottage		
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			<p>General Comments</p> <p>The planning process provides one of the most effective tools to manage the impact of land use change upon the historic environment. This is achieved both through the shaping of development plans (Local and Neighbourhood Plans) and the delivery of development management advice on individual planning applications. In that context, the inclusion of heritage in your Neighbourhood Plan, and the provision of relevant and effective policies, will significantly strengthen the management of these issues, and will be an effective way of the community identifying its own concerns and priorities.</p> <p>Ideally, Neighbourhood Plans should seek to work in partnership with other agencies to develop and deliver this strategic objective, based on robust local evidence and priorities. We recommend that each Neighbourhood Plan should consider the impact of potential development or management decisions on the conservation and enhancement of the historic environment. The historic environment is defined as comprising all aspects of the environment resulting from the interaction between people and places through time, including all surviving evidence of past human activity, whether upstanding, buried or submerged, as well landscapes and their historic components.</p> <p>The Leicestershire and Rutland Historic Environment Record (LRHER) can provide a summary of archaeological</p>	<p>These general comments which are not related to the Broughton Astley NP Review are noted.</p>	<p>None</p>
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			<p>and historic environment information for your Neighbourhood Plan area. This will include gazetteers and maps describing the locally identified non-designated heritage assets, typically archaeological sites (both earthworks and buried archaeological remains), unlisted historic buildings and historic landscapes (parks and gardens). We will also provide information on medieval ridge and furrow earthworks to help you evaluate the surviving earthworks in your area.</p> <p>Information on Designated assets (Scheduled Monuments, Listed Buildings, Registered Parks and Gardens, Battlefields) is available from the National Heritage List for England (NHLE). https://historicengland.org.uk/listing/the-list/</p> <p>Consideration of the historic environment, and its constituent designated and non-designated heritage assets, is a material consideration in the planning process. While the data held by the LRHER is constantly maintained and updated, it is unlikely that the record represents an exhaustive list of all assets with the plan area. We suggest that information provided by the LRHER should be taken into account when preparing the Neighbourhood Plan and contribute to any list of locally identified heritage assets. Based upon a structured assessment process, this will be the basis of any non-designated heritage assets identified within the plan and given force through the preparation of appropriate heritage policy.</p>		
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			<p>Contact: her@leics.gov.uk, or phone 0116 305 8323 For help with including heritage in your Neighbourhood Plan please see the following guidance: CBA Toolkit No. 10, Neighbourhood Planning (2020)</p> <p>https://www.archaeologyuk.org/asset/6FE3A721-B328-4B75-9DEBBD0028A4AEED/</p> <p>National Trust Guide to Heritage in Neighbourhood Plans (2019)</p> <p>https://nt.global.ssl.fastly.net/binaries/content/assets/weBSITE/national/pdf/neighbourhood_planning-guidance.pdf</p>		
		Page 117	<p>Environment</p> <p>Specific Comments: Waste Policy and Strategy team Page 117 of the Design Codes and Guidance document – suggest adding in the text highlighted in yellow.</p> <p>Make sufficient provision for sustainable waste management (including facilities for kerbside collection in locations convenient and accessible for collection and emptying, waste separation, and minimisation where appropriate) without adverse impact on the street scene, the local landscape or the amenities of neighbours.</p>	<p>Noted.</p> <p>The Design Guide and Codes has been formally signed off by Locality and cannot be amended.</p>	None
		Policy 6	Climate Resilience team		



			<p>Design and Design Codes F1 – Resilience to the climate emergency, F2 – Assessing alternative energy sources and F4 – Energy efficiency measures towards net-zero carbon</p> <p>The presence of a section on Resilience to the climate emergency within the Design Guide and Codes is welcomed. Figure F.110 gives a good visual representation of some important design solutions. However, Design Code F1 lacks tangible actions that could help to realise the policy aim. For example, the document should specify the rainfall event(s) that are to be mitigated wholly within the boundary of the site. Design Code F1 should also specify design led solutions for overheating such as external blinds or shutters on south facing glazing, enhanced natural ventilation and house types that maximise cross ventilation. It is welcomed that sustainability is mentioned however it is highly recommended that the sustainability related design codes be referenced within the policy wording, so that developers can understand its importance to the area.</p>	<p>Noted.</p> <p>Policy 6 on design already requires planning proposals to reference how the design guide and codes has been taken into account.</p> <p>It is not felt necessary to reference specific elements of the document – doing so would make the other elements appear less important.</p>	<p>None</p> <p>None</p> <p>None</p>
		Policy 26, 27, 28	<p>Biodiversity and Habitat Connectivity, Trees and Hedgerows, Climate Change and Flood Risk, Design Codes E Natural Features, E2 Right tree, right place and F1 – Resilience to the climate emergency</p> <p>The introduction of this policy is welcomed as is the focus on climate change. It could perhaps be made stronger by</p>	<p>Agreed. The policy and figure 11.1</p>	



			specifying that run off rates for new developments should not exceed that which the site currently experiences. This should be achieved through on-site green SuDS that allow water to infiltrate the ground within its boundary. If not possible then state specific rainfall events such as 1 in 10-year return period events for which water drainage off the site should not occur. Consider adding to policy 27 and 28 that high quality green infrastructure should be designed in at a master planning stage.	were drafted before the 2025 and 2026 E.A. metrics and mappings were published	Changes to be made as indicated
		Policy 28	<p>Climate Change and Flood Risk</p> <p>Flooding is a topic of high concern within Leicestershire. Policy 28 would benefit from being strengthened to reflect this. The plan should seek assurances from developers that surface water run off rates from the site are suitable and sustainable in the face of rapidly intensifying rainfall and flooding events. Developers should provide certainty that their proposals will not lead to heightened flood risk within the site itself, locally or further downstream in the catchment. Moreover, new developments, including their infrastructure, should be capable of retaining functionality in the event of exceptional but increasingly common rainfall events including those exceeding 20mm in an hour and over 200mm in 24 hours</p>	Agreed.	Changes to be made as indicated
		Policy 19	<p>Infrastructure and Design Code G4 Public Realm:</p> <p>LCC would like to see more emphasis on the importance of building social resilience in the face of growing trends for</p>	The Design Guide and Codes has been formally signed off so	None



			<p>extreme weather. Placemaking is a vital tool to engender greater social resilience, therefore it is recommended that policy 19 require inclusion of new assets or enhancement of existing assets that can facilitate improved social cohesion such as multi-use buildings or ensuring good active travel connections to existing facilities. High quality outdoor green spaces can also perform a similar function. Not only do these communal facilities provide space for improved social cohesion, but they can also accommodate essential services during extreme weather such as heat waves and flood events.</p> <p>General Comments</p> <p>With regard to the environment and in line with Government advice, Leicestershire County Council (LCC) would like to see Neighbourhood Plans cover all aspects of archaeology and the historic and natural environment including heritage assets, archaeological sites, listed and unlisted historic buildings, historic landscapes, climate impacts, the landscape, biodiversity, ecosystems, green infrastructure as well as soils, brownfield sites and agricultural land.</p>	<p>cannot be amended.</p> <p>These general comments which are not related to the Broughton Astley NP Review are noted.</p>	<p>None</p>
			<p>Climate Change</p> <p>The County Council has an Environment Strategy which is available on Leicestershire County Council's website.</p>	<p>These general comments which are not related to the Broughton Astley NP Review are noted.</p>	<p>None</p>



			<p>In June 2019 the Climate Change Act (2008) was amended committing the UK to achieving net zero carbon emissions by 2050.</p> <p>Planning is one of the key levers for enabling these commitments to be met. Neighbourhood Plans should, as far as possible, align to Leicestershire County Council's Environment Strategy.</p> <p>Furthermore, Neighbourhood Plans should, as far as possible, seek to include measures which increase the neighbourhood's resilience to climate change such as avoiding building on flood plains, using sustainable urban drainage systems, using nature based solutions to reduce flood risk, reducing the amount of non-permeable hard surfaces and encouraging tree planting, green walls and roofs to provide natural shading and cooling.</p> <p>These recommendations not only protect local communities but also enhance well-being, lower energy bills and create prosperous future proof neighbourhoods.</p> <p>The National Planning Policy Framework (NPPF): Meeting the challenge of climate change, flooding and coastal change – paragraphs 161 to 186. Para 161 - The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas</p>		
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				emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.		
				<p>Landscape</p> <p>The County Council would like to see the inclusion of a local landscape assessment taking into account: Natural England’s Landscape character areas; the Leicestershire, Leicester and Rutland Historic Landscape Characterisation Project; the Local District/Borough Council landscape character assessments; and the Landscape Sensitivity and Green Infrastructure Study for Leicester and Leicestershire (2017), which examines the sensitivity of the landscape, exploring the extent to which different areas can accommodate development without impacting on their key landscape qualities.</p> <p>The Local Nature Recovery Strategy for Leicestershire, Leicester and Rutland includes chapters on The National Character Area (5.2) and State of Nature (7) across the strategy area and identifies opportunities for nature recovery: https://www.leicestershire.gov.uk/sites/default/files/2025-07/LLR-Local-Nature-Recovery-Strategy.pdf</p> <p>We would recommend that Neighbourhood Plans should also consider the street scene and Midlands’ public realm</p>	These general comments which are not related to the Broughton Astley NP Review are noted.	None



			<p>within their communities, further advice can be found in the latest 'Streets for All East document (2018) published by Historic England https://historicengland.org.uk/images-books/publications/streets-for-all-east-midlands/</p> <p>For more information on place-making within new development please review Manual for Streets and Manual for Streets 2 Wider Applications of the Principles. Leicestershire County Council have a new Highway Design Guide</p> <p>LCC would encourage the development of local listings as per the National Planning Policy Framework (NPPF) and LCC have some data on the social, cultural, archaeological and historic value of local features and buildings (https://www.leicestershire.gov.uk/leisure-and-community/history-and-heritage/historic-environment-record)</p> <p>Contact: her@leics.gov.uk or telephone: 0116 3058323</p> <p>Examples of policy statements for Landscape:</p> <p>POLICY X: LOCAL LANDSCAPE CHARACTER AREAS – Development proposals falling within or affecting the Local Landscape Character Areas (LLCAs), where possible, enhance the LLCA's particular characteristics, important views and local distinctiveness. Proposals having a harmful effect on a Local Landscape Character Area's character will not be supported. Landscape Assessment is a specialist</p>		
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				area and accredited landscape consultants can provide advice. https://www.landscapeinstitute.org/		
				<p>Biodiversity</p> <p>Section 40 of the Natural Environment and Rural Communities Act 2006 (NERC Act) as amended by section 102 (1c) of the Environment Act 2021 places what is called the strengthened biodiversity duty on all public authorities in England and Wales to conserve and enhance biodiversity, in the exercise of their duties.</p> <p>The National Planning Policy Framework (NPPF) clearly outlines the importance of sustainable development alongside the core principle that planning should contribute to conserving and enhancing the natural environment, providing net gain for biodiversity, and reducing pollution. Neighbourhood Plans should therefore seek to work in partnership with other agencies to develop and deliver a strategic approach to protecting and improving the natural environment based on local evidence and priorities. Each Neighbourhood Plan should consider the impact of potential development or management of open spaces on enhancing biodiversity and habitat connectivity, such as hedgerows and greenways. Habitat permeability for species which addresses encouragement of movement from one location to another such as the design of street lighting, roads, noise, exposure to chemicals, obstructions in water, exposure of species to predation, Invasive and Non-Native</p>	These general comments which are not related to the Broughton Astley NP Review are noted.	None



			<p>Species, and arrangement of land uses should be considered.</p> <p>The Neighbourhood Plan can be used to plan actions for the parish council on its' own land (community actions) and guide the actions of others (policy actions).</p> <p>In July 2025 the Local Nature Recovery Strategy (LNRS) for Leicestershire, Leicester and Rutland was launched. The LNRS sets out the landscape scale priorities for nature recovery across the area, identifying priority areas and measures. Details on the LNRS and supporting resources can be found here: https://www.leicestershire.gov.uk/environment-and-planning/local-nature-recovery-strategy/leicestershire-leicester-and-rutland-local-nature-recovery-strategy</p> <p>Local Nature Recovery Strategies are not intended to provide red line boundaries preventing or placing new restrictions on land use which may be changed either through development or in taking advantage of new opportunities identified through the strategy. This has been established by national guidance. LNRS's are an additional evidence base to inform Local Plans, and other elements of the formal Development Plan which include Neighbourhood Plans and the proposed new Spatial Development Strategies. Local Plans remain the primary tool used by local planning authorities to determine which land should be developed and how.</p>		
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			<p>For specific advice on species and habitats of importance in the County and actions that can make a difference to their conservation and ways to increase the quality and quantity of these, please refer to the Leicestershire and Rutland Biodiversity Action Plan:</p> <p>https://www.lrwt.org.uk/about-us/caring-wild-places/biodiversity-action-plan</p> <p>https://www.leicestershire.gov.uk/sites/default/files/2025-07/LLR-Local-Nature Recovery-Strategy.pdf</p> <p>https://www.leicestershire.gov.uk/environment-and-planning/planning/biodiversity/planning-and-biodiversity</p> <p>The Leicestershire and Rutland Environmental Records Centre (LRERC) can provide a summary of wildlife information for your Neighbourhood Plan area. This will include a map showing nationally important sites (e.g. Sites of Special Scientific Interest); locally designated Wildlife Sites; locations of badger setts, great crested newt breeding ponds and ponds with high potential to support great crested newts and bat roosts; and a list of records of protected and priority Biodiversity Action Plan species. These are all a material consideration in the planning process. If there has been a recent Habitat Survey of your plan area, this will also be included. LRERC is unable to carry out habitat surveys on request from a Parish Council, although it may be possible to add it into a future survey programme.</p>		
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			<p>Contact: LRERC@leics.gov.uk., or phone 0116 305 1087</p> <p>https://www.leicestershire.gov.uk/environment-and-planning/planning/leicestershire-and-rutland-environmental-records-centre-lrerc</p> <p>For informal advice on actions for nature that can be taken forward on parish land please contact EnvironmentTeam@Leics.gov.uk</p> <p>There are many protected species of plants and animals in England and often their supporting features and habitats are also protected. What you can and cannot do by law varies from species to species and may require a preliminary ecological appraisal. For information on protected species and the law please visit: https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications</p> <p>Examples of policy statements that can be added to the plan to support biodiversity:</p> <p>POLICY X: BIODIVERSITY PROTECTION IN NEW DEVELOPMENT – Consideration should be made in the design and construction of new development in the Plan Area to protect and enhance biodiversity, where appropriate, including:</p> <ul style="list-style-type: none">• Roof and wall construction should incorporate integral bee bricks, bird nest boxes and bat breeding and roosting		
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				<p>boxes. Target species and locations to be based on advice sought from the Local Authority’s Biodiversity Officer (or equivalent).</p> <ul style="list-style-type: none">• Hedges (or fences with ground-level gaps) should be used for property boundaries to maintain connectivity of habitat for hedgehogs and other terrestrial animals.• Work with landowners to ensure good maintenance of existing hedgerows, gap up and plant new hedgerows where appropriate and introduce a programme of replenishing hedgerow trees.• Avoidance of all unnecessary exterior artificial lighting: there is no legal duty requiring any place to be lit.• Security lighting, if essential, should be operated by intruder sensors and illuminated for no longer than 1 minute. Sports and commercial facility lighting should be switched off during agreed ‘curfew’ hours between March and October, following best practice guidelines in Bats and Lighting Leicestershire Environmental Records Centre, 2014.• Lighting design, location, type, lux levels and times of use should follow current best practice, e.g. by applying the guidelines in Guidance note 08/18 Bats and artificial lighting in the UK: Bat Conservation Trust / Institution of Lighting Professionals, 2018.		
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			<ul style="list-style-type: none">• Natural/semi natural grassland margins adjacent to hedges of up to 5m buffer.• Retain natural features wherever possible.• In creating habitats, consider the underlying geology and allow natural colonisation near local high-quality habitats.• Avoid use of topsoil to promote plant diversity, especially in areas of limestone or areas near to heathland - consider exposing sandy soils to encourage acid grassland and heath.• Allow for structural diversity of habitats – for example long and tall grass, to maintain a suitable grassland habitat for wildlife. A management plan should accompany all planning applications.• Avoid development and hard landscaping next to watercourses.• Restore naturalness to existing watercourses for example by retaining some steeper earth banks suitable for Kingfisher and Water Vole breeding.• Retain areas of deadwood within the site to maintain biodiversity.• Plant 30% of trees with a selection of larger native species and create lines of trees (this could support the feeding		
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				zone of bats for instance and well managed hedges can do the same).		
				<p>Green Infrastructure</p> <p>Green infrastructure (GI) is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities (NPPF definition). GI includes parks, open spaces, playing fields, woodlands, street trees, cemeteries/churchyards, allotments and private gardens as well as streams, rivers, canals and other water bodies and features such as rain gardens, pocket parks and swales.</p> <p>The NPPF places the duty on local authorities to plan positively for a strategic network of GI which can deliver a range of planning policies including: building a strong, competitive economy; creating a sense of place and promoting good design; promoting healthier communities by providing greater opportunities for recreation and mental and physical health benefits; meeting the challenges of climate change and flood risk; increasing biodiversity and conserving and enhancing the natural and historic environment, and providing space for nature recovery. Looking at the existing provision of GI networks within a community can influence the plan for creating & enhancing new networks.</p>	These general comments which are not related to the Broughton Astley NP Review are noted.	None



			<p>Neighbourhood Plan groups have the opportunity to plan GI networks at a local scale to maximise benefits for their community and in doing so they should ensure that their Neighbourhood Plan is reflective of the relevant Local Authority Green Infrastructure strategy. Through the Neighbourhood Plan and discussions with the Local Authority Planning teams and potential Developers communities are well placed to influence the delivery of local scale GI networks.</p> <p>Sites that are designated as Local Green Spaces can form an important strategic part of local Green Infrastructure and can be conserved and enhanced to make an important contribution to the district green infrastructure. Delivery of the conservation and enhancement can be dealt with in Policy and Community Actions.</p> <p>NPs should be aware of the Local Nature Recovery Strategy for Leicester, Leicestershire and Rutland to consider how the sites and the management of them within the Neighbourhood area can contribute to the strategy and action for delivery.</p> <p>https://www.leicestershire.gov.uk/environment-and-planning/local-nature-recovery-strategy/what-a-local-nature-recovery-strategy-is</p>		
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			<p>Brownfield, Soils and Agricultural Land</p> <p>The NPPF encourages the effective use of brownfield land for development, except where this would conflict with other policies in the NPPF Framework, including causing harm to designated sites of importance for biodiversity. Neighbourhood planning groups should check with Defra and the District or Borough council who keep a register of brownfield sites to see if their neighbourhood planning area includes brownfield sites. Where information is lacking as to the ecological or heritage value of these sites then the Neighbourhood Plan could include policies that ensure such survey work should be carried out to assess the ecological and heritage value of a brownfield site before development decisions are taken.</p> <p>Soils are an essential finite resource on which important ecosystem services and food production depend. They should be enhanced in value and protected from adverse effects of unacceptable levels of pollution. Within the government’s “Safeguarding our Soils” strategy, Defra have produced a code of practice for the sustainable use of soils on construction sites which could be helpful to neighbourhood planning groups in preparing environmental policies.</p> <p>High quality agricultural soils should, where possible, be protected from development and where a large area of agricultural land is identified for development poorer quality areas should be used in preference to the higher</p>	<p>These general comments which are not related to the Broughton Astley NP Review are noted.</p>	<p>None</p>
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			<p>quality areas. Neighbourhood planning groups should consider mapping agricultural land classification within their plan to enable informed decisions to be made in the future. Natural England can provide further information and Agricultural Land classification and have produced the following guide.</p> <p>https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land.</p> <p>The British Society for Soil Science provide advice on what should be expected of developers in assessing land for development suitability. https://soils.org.uk/wp-content/uploads/2022/02/Assessing-Agricultural-Land-Jan-2022.pdf</p>		
			<p>Strategic Environmental Assessments (SEAs)</p> <p>Information for Neighbourhood Planning groups regarding Strategic Environmental Assessments (SEAs) can be found on the Neighbourhood Planning website (https://neighbourhoodplanning.org/toolkits-and-guidance/understand-plan-requires-strategic-environmental-assessment-sea/)</p> <p>and should be referred to. A Neighbourhood Plan must meet certain basic conditions in order to be ‘made’. It must not breach and be otherwise compatible with the Environmental Assessment of Plans and Programmes</p>	<p>These general comments which are not related to the Broughton Astley NP Review are noted.</p>	<p>None</p>



			<p>Regulations SI 2004/1633 (available online). These regulations deal with the assessment of environmental plans and programmes and implement Retained Reference Directive 2001/42 'on the assessment of the effects of certain plans and programmes on the environment'.</p> <p>Not every Neighbourhood Plan needs a SEA; however, it is compulsory to provide when submitting a plan proposal to the local planning authority either:</p> <ul style="list-style-type: none">• A statement of reasons as to why SEA was not required• An environmental report (a key output of the SEA process). <p>As a rule of thumb, SEA is more likely to be necessary if both of the following two elements apply:</p> <ul style="list-style-type: none">• a Neighbourhood Plan allocates sites for development (for housing, employment etc.); and• the neighbourhood area contains sensitive environmental assets (e.g. a Site of Special Scientific Interest (SSSI) or an Area of Outstanding Natural Beauty (AONB)) that may be affected by the policies and proposals in the Neighbourhood Plan. <p>In light of these two considerations, it is very unlikely that a Neighbourhood Plan would require SEA if the plan is not allocating land for development. This is because allocating</p>		
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			<p>land for development is more likely to generate physical changes which lead to significant effects.</p> <p>As the UK has now left the EU, Neighbourhood Planning groups should remain mindful of any future changes which may occur to the above guidance. Changes may be forthcoming as a result of the Levelling Up and Regeneration Act (LURA). This proposes 'Environmental Outcome Reports' to replace the current system of Strategic Environmental Assessment (including Sustainability Appraisals) and Environmental Impact Assessment and introduce a clearer and simpler process where relevant plans and projects (including Nationally Significant Infrastructure Projects) are assessed against tangible environmental outcomes. Prior to the new Labour government taking office, the provisions in the Act to enable the EORs to be brought forward had not been enacted and this remains the situation as of summer 2025 and is likely to continue beyond 2025.</p>		
			<p>Impact of Development on Household Waste Recycling Centres (HWRC)</p> <p>Neighbourhood planning groups should remain mindful of the interaction between new development applications in a district and borough area and the existing HWRC services delivered by Leicestershire County Council.</p>	<p>These general comments which are not related to the Broughton Astley NP Review are noted.</p>	<p>None</p>



			<p>The County Council’s Waste Management team considers the impact of increased waste arisings from proposed developments on a case by case basis and when it is identified that a proposed development will have a detrimental effect on the local HWRC infrastructure then appropriate projects towards site reconfiguration and/or development of waste infrastructure to increase the capacity for the nearest HWRC or any other HWRC directly impacted by the development have to be initiated.</p> <p>Planning obligations to fund these projects are requested in accordance with the Leicestershire County Council’s Planning Obligations Policy and the three CIL tests (as per Regulation 122 under the Community Infrastructure Regulations 2010 (as amended)) as described below:</p> <p>A planning obligation is a legally enforceable commitment (secured within a Section 106 agreement or S106 unilateral undertaking (as per s106 of the Town and Country Planning Act 1990 (as amended)) entered into to mitigate the impacts of development. Planning obligations can only be sought (and considered to be CIL compliant) where they meet the following 3 tests:</p> <ul style="list-style-type: none">• necessary to make the development acceptable in planning terms;• directly related to the development;		
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				<ul style="list-style-type: none"> • fairly and reasonably related in scale and kind to the development; 		
				<p>Public Health</p> <p>Health is shaped by many different factors throughout our lives. Health is affected by the settings in which we live, work, learn and play. These influences start to determine health and opportunities for better health from birth and throughout the whole life course, for example the environment, community, transport, education and income.</p> <p>This complex range of interacting social, economic and environmental factors are known as the wider determinants of health or the social determinants of health.</p> <p>When there is a difference in these conditions it contributes to health inequalities- “Health inequalities are the preventable, unfair and unjust differences in health status between groups, populations or individuals that arise from the unequal distribution of social, environmental and economic conditions within societies” (NHS England)</p> <p>The diagram below illustrates types of wider factors that influence an individual’s mental and physical health. The diagram shows:</p>	<p>These general comments which are not related to the Broughton Astley NP Review are noted.</p>	<p>None</p>



			<ul style="list-style-type: none">• personal characteristics at the core of the model and this includes sex, age, ethnic group, and hereditary factors• The layer around the core contains individual ‘lifestyle’ factor behaviours such as smoking, alcohol use, and physical activity• The next layer contains social and community networks including family and wider social circles• The next layer covers living and working conditions include access and opportunities in relation to jobs, housing, education and welfare services• The final outer layer is general socioeconomic, cultural and environmental conditions and includes factors such as disposable income, taxation, and availability of work Research by the Robert Wood Johnson Foundation, looked into the major contributors to health and wellbeing and found that: Health Behaviours contribute to 30% of health outcomes made up of:<ul style="list-style-type: none">• Smoking 10%• Diet/Exercise 10%• Alcohol use 5%• Poor sexual health 5%		
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				<p>Socioeconomic Factors contribute to 40% of health outcomes:</p> <ul style="list-style-type: none">• Education 10%• Employment 10%• Income 10%• Family/Social Support 5%• Community Safety 5% <p>Clinical Care contributes to 20% of health outcomes:</p> <ul style="list-style-type: none">• Access to care 10%• Quality of care 10% <p>Built Environment contributes to 10% of health outcomes:</p> <ul style="list-style-type: none">• Environmental Quality 5%• Built Environment 5% <p>Source: Robert Wood Johnson Foundation and University of Wisconsin Population Health Institute, Used in US to rank Counties by health Status</p> <p>Therefore, due to the complex way in which the built environment and communities we live in impact on our</p>		
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			<p>health any opportunity to mitigate negative impacts and enhance positive outcomes should be taken. Completing a Health Impact Assessment (HIA) is a good practice to ensure neighbourhood concerns and recommendations are considered.</p> <p>Undertaking a HIA as part of your neighbourhood plans has the potential to influence all these areas, alongside influencing decisions made about access to care through transport and infrastructure.</p> <p>To aid you in undertaking a HIA please visit: Health Impact Assessments Leicestershire County Council Professional Services Portal</p> <p>At the bottom of this page there are also links to a number of local data sheets at a district level. You can also familiarise yourself with the health profile for your area by visiting: https://fingertips.phe.org.uk/profile/health-profiles Leicestershire Inequalities JSNA Tableau Public and Health Inequalities and Wider Determinants of Health LSR Online</p> <p>Dahlgren G, Whitehead M. (1991). Policies and Strategies to Promote Social Equity in Health. Stockholm, Sweden: Institute for Futures Studies. NHS England, “Reducing health inequalities resources,” [Online]. Available: https://www.england.nhs.uk/about/equality/equality-hub/resources/ [Accessed February 2021].</p>		
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				<p>Active Together</p> <p>An ever-increasing body of research indicates that the environment in which we live is inextricably linked to our health across the life course. For example, the design of our neighbourhoods can influence physical activity levels, travel patterns, social connectivity, mental and physical health and wellbeing outcomes.” (Spatial Planning for Health- An evidence resource for planning and designing healthier places; Public Health England, 2017)</p> <p>There is growing evidence that the design of our built environments, places and travel routes can either discourage or encourage people to be physically active depending on how they are designed and constructed.</p> <p>The latest evidence shows that; there are still more than one in four adults doing less than 30 minutes of activity per week. People in the UK are around 20% less active now than in the 1960’s and the evidence also show that physical inactivity affects groups unequally, with women, people from ethnically diverse communities, people living in more deprived areas, people with disabilities, and people with long-term health conditions less likely to be active.</p> <p>Medically there is no dispute that increasing the level of physical activity is directly linked to improvement in physical and mental health and that regular physical activity contributes to a reduction in particular health</p>	<p>These general comments which are not related to the Broughton Astley NP Review are noted.</p>	<p>None</p>
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			<p>conditions i.e. obesity, CHD, diabetes and cardiovascular disease). Designing our neighbourhoods in a way that proactively encourages communities and residents to walk, cycle and be active is an important factor in improving population health.</p> <p>Over the next 30 years there are opportunities to shape the design of our neighbourhoods, residential developments, travel routes, town centres, employment spaces and other environments in such a way that physical activity (walking, cycling, recreational exercise) becomes an easy choice and benefits the health of our local population.</p> <p>Active Together encourages neighbourhood plans to adopt the 10 principles of Active Design Guidance. This is national published guidance for Local Authorities and place making stakeholders developed by Sport England, Active Travel England and the Department of Health and Social Care. Active Design aims to create places and spaces which encourage people to move more, with more opportunities for everyone to increase their activity levels and lead healthier lives.</p> <p>The full guidance can be accessed via Sport England: https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design</p> <p>The Ten Principles of Active Design</p>		
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				<p>Foundational Principles</p> <p>1. Activity for all</p> <p>Supporting Active Travel</p> <p>2. Walkable Communities</p> <p>3. Providing connected active travel routes</p> <p>4. Mixing Uses and co-locating facilities</p> <p>Active, High-Quality Places and Spaces</p> <p>5. Active buildings inside and out</p> <p>6. Providing activity infrastructure</p> <p>7. High-quality streets and spaces</p> <p>8. Network of multi-functional open spaces</p> <p>Creating and Maintaining Activity</p> <p>9. Activating spaces</p> <p>10. Maintaining high-quality flexible spaces</p> <p>The places we inhabit can have a considerable effect on our health, behaviour and quality of life. Places that provide opportunities for people to lead physically active</p>		
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			<p>lives can positively impact people’s physical and mental wellbeing. But the opposite can also be true, where the design of a place creates barriers making it difficult, unpleasant or inconvenient for people to be physically active</p> <p>Embedding principles of developing Active Environments at a strategic level could result in:</p> <ul style="list-style-type: none">• Housing developments which make walking and cycling the preferred method of individual transport and reduced reliance on the car and motorised transport.• Neighbourhoods where people live closer to where they work, and sustainable transport becomes a realistic option.• Safe mixed-use developments and neighbourhoods where residents feel safe and encouraged to maximise outdoor space for travel and recreation.• A contribution to increasing local population physical activity levels and a factor in reducing air pollution and maximising green infrastructure• Supporting Local Authority corporate challenges to improve health outcomes, develop community cohesion, and impact on community safety and neighbourhood resilience.		
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			<p>The benefits of places that encourage activity go beyond just public health. Compact, walkable, linked communities that are centred around people being active rather than using cars:</p> <ul style="list-style-type: none">• Are more environmentally friendly,• Have lower carbon emissions,• Have better air quality,• Are more socially inclusive,• Are more economically productive. <p>Active Environments:</p> <ol style="list-style-type: none">1. More environmentally friendly2. Better air quality3. More economically productive4. More socially inclusive5. Lower carbon emissions <p>Sport England have produced a useful Active Design check list for Local Authorities to use in the planning of places and new environments: Active Design Checklist</p>		
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			<p>There is further published planning support guidance that encourages the design of local and neighbourhood plans to adopt principles that encourage provision for physical activity and sport:</p> <p>Planning for Sport</p> <p>Active Together supports and works collaboratively with Leicestershire County Council Public Health Team to encourage health-based planning and supports the use of Health Impact Assessments and use of local health data to support planning decisions</p> <p>Other useful information and guidance for the healthy design of local places has been collated and can be found at: https://www.active-together.org/active-environmentshttps://www.active-together.org/active-environments</p> <p>Active Together would welcome the opportunity to discuss the development of the neighbourhood plan and examine, with the Parish Council, the opportunities for shaping infrastructure design, systems and processes within the plan that would maximise physical activity opportunities for those communities and residents impacted by the neighbourhood plan.</p>		
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			<p>Communities</p> <p>Consideration of community facilities is a positive facet of Neighbourhood Plans that reflects the importance of these facilities within communities and can proactively protect and develop facilities to meet the needs of people in local communities. Neighbourhood Plans provide an opportunity to;</p> <ol style="list-style-type: none">1. Carry out and report on a review of community facilities, groups and allotments and their importance with your community.2. Set out policies that seek to;<ul style="list-style-type: none">• protect and retain these existing facilities,• support the independent development of new facilities, and,• identify and protect Assets of Community Value and provide support for any existing or future designations.3 Identify and support potential community projects that could be progressed. <p>You are encouraged to consider and respond to all aspects of community resources as part of the Neighbourhood Planning process. Further information, guidance and examples of policies and supporting information is</p>	<p>These general comments which are not related to the Broughton Astley NP Review are noted.</p>	<p>None</p>
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				available at www.leicestershirecommunities.org.uk/np/useful-information .		
				Economic Development We would recommend including economic development aspirations with your Plan, outlining what the community currently values and whether they are open to new development of small businesses etc.	These general comments which are not related to the Broughton Astley NP Review are noted.	None
		Policy 17		Fibre Broadband Specific Comments Section 8.1.7 The second paragraph refers to the Government’s levelling up agenda for rural communities improving high-speed internet access. The current programme for improving internet access in rural communities is the Government funded Project Gigabit and this is due to deliver gigabit capable connections to 99% of the UK by 2032 and will delivery to at least 14,000 premises in Leicestershire’s most hard-to-reach communities. Broadband Infrastructure This section needs to be updated to refer to gigabit capable full-fibre broadband rather than superfast broadband.	Noted. Noted	Change to be made as indicated Change to be made as indicated



			<p>Please see the General comments section below for further details on this including information on new laws that have been put in place for developers.</p> <p>General Comments</p> <p>Our ambition is for a Digital Leicestershire. This includes the ambition for everyone to have access to fast, accessible, inclusive, reliable digital infrastructure and we are working to support government targets to achieve gigabit capable, lightning-fast broadband connections to 85% of the UK by December 2025, increasing to near universal coverage by 2030.</p> <p>A fast and reliable digital infrastructure will open new opportunities for residents, communities and businesses. It will underpin innovation, improve community and social networks and support learning and development for all. It will help to deliver a range of societal benefits including the more effective provision of public services, information and connect people to support at the point of need.</p> <p>The Digital Leicestershire team manages programmes aimed at improving digital infrastructure in the county. This includes superfast, ultrafast and full fibre broadband. This work combines three approaches; engaging with commercial operators to encourage private investment in Leicestershire, working with all tiers of government to reduce barriers to commercial investment, and operating intervention schemes with public funds to support</p>	<p>These general comments which are not related to the Broughton Astley NP Review are noted.</p>	<p>None</p>
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			<p>deployment of digital infrastructure in hard-to-reach areas that are not included in broadband suppliers' plans, reaching parts of the county that might otherwise miss out on getting the digital connectivity they need. We are currently providing support throughout the county with our Gigabit and Gigahub programmes.</p> <p>How does this role relate to neighbourhood plans?</p> <p>The UK government has brought into force new laws that require new homes in England to be built with gigabit broadband connections and enable telecom firms to be able to get faster broadband to nine million people living in blocks of flats across the UK.</p> <p>Ministers have amended the Building Regulations 2010 to ensure that new homes constructed in England will be fitted with infrastructure and connections capable of delivering gigabit broadband - the fastest internet speeds on the market.</p> <p>The updated regulations mean that more people moving into new homes will have a gigabit capable broadband connection ready when construction is completed, avoiding the need for costly and disruptive installation work after the home is built and enabling residents to arrange the best possible internet service at the point they move in.</p> <p>In a further boost to people's access to better broadband, another new law has made it easier to install faster internet</p>		
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			<p>connections in blocks of flats when landlords repeatedly ignore requests for access from broadband firms.</p> <p>Both of these new laws came into effect on 26 December 2022.</p> <p>The updated building rules mean home developers will be legally required to future-proof new homes in England for next-generation gigabit broadband as standard practice during construction.</p> <p>Connection costs will be capped at £2,000 per home for developers and they will work together with network operators to connect developments to the gigabit network. It is estimated that over 98 per cent of premises fall within this cap, meaning moving into a new build property without lightning-fast internet speeds will become a thing of the past for the vast majority of people across England.</p> <p>Where a developer is unable to secure a gigabit-capable connection within the cost cap, developers must install the next fastest connection available.</p> <p>And even where a gigabit-capable connection is not available within the cost cap, gigabit ready infrastructure, such as ducts, chambers and termination point, still needs to be installed. This will ensure that homes are fit for the digital age but may not be connected straight away.</p>		
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			<p>The Council supports a ‘dig once’ approach for the deployment of communications infrastructure and a build which is sympathetic to the character and appearance of the surrounding area. The Council encourages telecommunications build which does not significantly impact on the appearance of any building or space on which equipment is located and which minimises street clutter.</p> <p>Groups working on emerging neighbourhood plans are encouraged to visit the Digital Leicestershire web site to learn more about current and forthcoming full fibre broadband provision for their local area https://www.thinkbroadband.com/ and also BDUK (Building Digital UK)</p> <p>Further Information</p> <p>https://digital-leicestershire.org.uk/</p> <p>Email: broadband@leics.gov.uk</p> <p>Building Regulations: Infrastructure for Electronic Communications (R)</p>		
			<p>Equalities</p> <p>While we cannot comment in detail on plans, you may wish to ask stakeholders to bear the Council’s Equality Strategy</p>	<p>These general comments which are not related to the Broughton</p>	<p>None</p>



			<p>2020-2024 in mind when taking your Neighbourhood Plan forward through the relevant procedures, particularly for engagement and consultation work. A copy of the strategy can be view at:</p> <p>https://www.leicestershire.gov.uk/sites/default/files/2024-10/equality-diversity-and-inclusion-strategy-2024-2028.pdf</p> <p>The Neighbourhood plan should comply with the main requirements of the Public Sector Equality Duty. This requires public bodies to have due regard of the need to:</p> <p>Eliminate discrimination</p> <p>Advance equality of opportunity</p> <p>Foster good relations between different people</p>	<p>Astley NP Review are noted.</p>	
			<p>Accessible Documents</p> <p>In today’s working environment more information is being produced digitally. When producing information which is aimed at or to be viewed by the public, it is important to make that information as accessible as possible. At least 1 in 5 people in the UK have a long-term illness, impairment or disability. Many more have a temporary disability.</p> <p>Accessibility means more than putting things online. It means making your content and design clear and simple</p>	<p>Noted. The NP will be made fully accessible prior to submission, as was always intended.</p>	<p>None</p>



			<p>enough so that most people can use it without needing to adapt it, while supporting those who do need to adapt things.</p> <p>For example, someone with impaired vision might use a screen reader (software that lets a user navigate a website and ‘read out’ the content), braille display or screen magnifier. Or someone with motor difficulties might use a special mouse, speech recognition software or on-screen keyboard emulator.</p> <p>Public sector organisations have a legal requirement to make sure that all information which appears on their websites is accessible. As Neighbourhood Plans have to be published on Local Planning Authority websites, they too have to comply with government regulations for accessibility. Guidance for creating accessible Word and PDF documents can be found on the Leicestershire Communities website:</p> <p>Creating Accessible Word Documents</p> <p>Creating Accessible PDFs</p> <p>To enable Development Officers to implement your policies, it is important to make sure that they are clear, concise and worded in such a way that they are not open to interpretation. This Policy Writing Guide has been designed to provide you with a few key points to look out for:</p>		
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				https://www.leicestershirecommunities.org.uk/uploads/policy-writing-guide-17.pdf?v=1667547963		
21			Matt Bills HDC			
		Policy 1		<p>The draft Neighbourhood Plan allocates 138 dwellings at Witham Villas in addition to the 475-dwelling strategic allocation already set in the emerging Local Plan (Policy SA01 – Land off Frolesworth Road). The adopted Local Plan does not allocate housing to Broughton Astley</p> <p>We note that the additional allocation will help to future proof the Plan against increasing housing numbers and is an approach supported by the LPA.</p> <p>Regulation 14 Comment: The proposed allocation of 138 additional dwellings would be in addition to the proposed Local Plan strategic housing distribution. The proposed Local Plan already allocates a single strategic site for Broughton Astley.</p>	Noted	None
		Policy 2		<p>The new LTD boundary in the Neighbourhood Plan may over-restrict infill development or conflict with Local Plan flexibility but HDC re generally supportive of LTD as an enabling policy for development to take place within them, however it can lead to tension if a small development</p>	<p>Agreed.</p> <p>It is appropriate to draw the LtD tightly given the</p>	Change to be made as indicated.



			<p>adjacent to the boundary is proposed as the harm of the development is minimal but the red line is seen locally as immovable.</p> <p>There is potential for policy 2 to be interpreted differently. Under one interpretation, development beyond the LTD will be generally restricted to development that serves local needs or supports the rural economy, alongside essential infrastructure. Under another interpretation, the policy provides greater flexibility to support allocations brought forward for development through strategic policies in the Local Plan. In the former interpretation, the proposed development of 475 dwellings at Land off Frolesworth Road, which is allocated in the emerging Draft Local Plan will be supported in principle despite falling outside of the LTD. This would ensure alignment with the emerging Draft Local Plan which is reaching an advanced stage of production with submission to the Secretary of State expected next month. For the latter interpretation, the proposed allocation in the emerging Local Plan is not specifically supported. Planning Practice Guidance indicates that it is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging Local Plan. It is suggested that the policy is clarified to expressly state that allocations in the Local Plan will be supported outside the LTD.</p> <p>Regulation 14 Comment: The introduction of rigid Limits to Development may conflict with the Local Plan's criteria-led approach and could</p>	<p>allocation within the NP which therefore exceeds the minimum housing requirement, however the policy will be reworded to support the Local Plan allocation.</p>	
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			<p>inadvertently prevent sustainable small-scale growth supported under GD2.</p> <p>Concerns that the wording of Policy 2 is not clear and open to interpretation. It is suggested that the policy specifically refers to Local Plan allocated sites and state that the general countryside policies do not apply to land allocated for development by strategic policies in the Local Plan. This amendment will clarify the meaning and assist in ensuring the neighbourhood plan does not become out of date quickly.</p> <p>The settlement boundary should be amended to take account of the strategic allocation in the PSLP - see Reg 14 comment re conformity with PSLP below</p>		
		Policy 4	<p>The policy places strong emphasis on bungalows and small homes, which is stricter and more prescriptive than the Local Plan's general approach to mix (H5).</p> <p>Regulation 14 Comment: The prescriptive requirement for specific housing types may exceed what the Local Plan requires. The Neighbourhood Plan should ensure flexibility unless robustly evidenced.</p>	The policy is based on the Housing Needs Assessment prepared for the NP so the deviation from the Local Plan is justified.	None
		Policy 5	<p>While the Local Plan requires 40% affordable housing, the Neighbourhood Plan imposes:</p> <ul style="list-style-type: none"> • a 60% rent / 40% ownership split • specific percentages for First Homes (40–50%) and 	Agreed. We will amend the ratios to require adherence to the most recent	Change to be made as indicated.



			<ul style="list-style-type: none"> specific shared ownership proportions (10–25%) <p>These requirements exceed the prescriptive level in Local Plan Policy H2. It should be noted that policy HN01 of the emerging Draft Local Plan similarly seeks 40% affordable housing. The tenure split identified for affordable housing is about 75% affordable or socially rented and 25% affordable home ownership. The tenure split for the emerging Local Plan is based on up-to-date analysis in the Harborough Local Housing and Employment Land Evidence published in February 2025.</p> <p>Regulation 14 Comment: The affordable tenure mix is more prescriptive than Local Plan H2, which allows flexibility based on evidence. The Neighbourhood Plan should avoid fixed ratios unless justified through up-to-date evidence. Evidence will eventually become dated, so care is required when seeking fixed ratios.</p>	evidence of housing need.	
		Policy 11	<p>The Plan introduces additional safeguards, such as protecting village centre viability, beyond Local Plan BE policies.</p> <p>While not necessarily in conflict, this adds requirements not present in the Local Plan, creating a risk of restricting sustainable employment growth.</p> <p>Regulation 14 Comment: Additional restrictions on employment uses may undermine the Local Plan’s employment strategy. The</p>	We consider the criteria to be appropriate and proportionate	None



			<p>Neighbourhood Plan should clarify how these restrictions remain aligned with BE1–BE3.</p> <p>The policy numbering is slightly confused in policy 11. Could use bullet points and ‘or’ at the end of each line in section a)</p>	<p>Agreed. We will insert the word ‘or’ after each line.</p>	<p>Change to be made as indicated.</p>
		Policy 20/21	<p>The Plan proposes extensive additional Important Open Space and new Local Green Spaces beyond those in Local Plan GI2/GI3. The proposals appear consistent with the Local Plan.</p> <p>Ensure that any large-scale designations are not over-extensive or overly restrictive, contrary to NPPF tests.</p> <p>Regulation 14 Comment: Some proposed designations appear extensive and may not meet NPPF criteria for Local Green Space. Stronger evidence might be required to justify their exceptional local value. Ensure the lands owners have been contacted with regards to the proposed designation, especially for Local Green Space.</p>	<p>Noted</p> <p>Appendix 6 provides the evidence base for the LGSs. We consider the evidence base to be sufficient.</p>	<p>None</p> <p>None</p>
		Policy 26	<p>The Plan extends Areas of Separation, especially toward Dunton Bassett, beyond those established in the Local Plan’s Areas of Separation Study.</p> <p>Area of separation should be evidence based and not overly restrictive for future growth.</p>	<p>Noted.</p> <p>The evidence to justify the areas of separation is provided in the</p>	<p>None</p>



				<p>Regulation 14 Comment: Additional justification might be required for the areas of separation.</p>	level of developer interest in the sites.	
		Policy 28		<p>The policy is more stringent than Local Plan CC3, requiring mandatory hydrological studies, biodiversity net gain, and specific SuDS measures. While positive, it may impose non-viability risks or conflict with the Local Plan's more flexible approach.</p> <p>Regulation 14 Comment: The Neighbourhood Plan should ensure that new technical requirements do not undermine viability unless supported by proportionate evidence. Some provisions of this policy may be covered in the emerging Draft Local Plan, particularly DM07 and DM08 - policy could potentially be rationalised to minimise duplication and repetition.</p>	Noted. We will add in 'subject to viability' where appropriate.	Change to be made as indicated.
		Policy 8		<p>The draft Plan sets minimum parking standards, while LCC uses maximum standards. This creates inconsistency with Local Plan IN2 and County Highways guidance.</p> <p>Regulation 14 Comment: Minimum parking standards may conflict with Local Transport Policy. Evidence should be provided to justify deviation from county standards.</p>	The policy requires conformity with LCC Highways standards.	None



		Policy 15		<p>The Plan introduces a policy to support communal electric car charging facilities.</p> <p>Regulation 14 Comment:</p> <p>Some provisions in this policy may be included in the emerging Draft Local Plan, particularly policy DM06 - policy could potentially be deleted to simplify the neighbourhood plan and avoid repetition.</p>	We would prefer to retain the policy as the draft Local Plan is untested at Examination.	None
	General			<p>Spelling / Grammar Errors</p> <p>These should be corrected for clarity and presentation:</p> <ul style="list-style-type: none"> • “<i>requite</i>” → require • “<i>midtwenties</i>” → mid-twenties • “look pout for further information” → look out • “Broughton Artea” → Area • “ion this Plan” → in this Plan • Check uppercase and lowercase for policy numbering – it changes in parts 	Agreed	Change to be made as indicated.
				<p>Policy Numbering Inconsistencies</p> <p>Regulation 14 Comment:</p> <p>Some policy numbering should be rationalised to avoid confusion for applicants and decision-makers. See comments above about Policy 11.</p>	Noted. We will consider the policy numbering to ensure consistency.	



				<p>Content Inconsistencies</p> <ul style="list-style-type: none"> • Policy 31 introduces ridge and furrow protections not referenced in Local Plan heritage policies HC1–HC3. This is of course a matter for the Neighbourhood Plan to include at discretion and with evidence. • Some sections refer to outdated partner documents. <ul style="list-style-type: none"> ○ Environment Agency Flood Risk Strategy (2019 Draft) <ul style="list-style-type: none"> ▪ Issue: The EA strategy has since been finalized and updated with a flood risk strategy for Leicestershire in Feb 2024 ○ National Planning Policy Framework (NPPF) <ul style="list-style-type: none"> ▪ Referenced as “updated in December 2023” and “December 2024” in different sections. Check up to date version and para numbers. ○ Leicester & Leicestershire Housing and Economic Development Needs Assessment (HEDNA) <ul style="list-style-type: none"> ▪ Dated January 2017. Is there more recent evidence? • References to “Charnwood Borough Council Planning Guidance” are incorrect for Harborough context. 	Agreed	Changes to be made as indicated.
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			<p>Housing section inconsistencies</p> <ul style="list-style-type: none"> The Plan states “no new major housing sites are proposed in our new plan” but then allocates new housing for 178 dwellings (Witham Villas). Reference to “windfall in Sileby” (copy/paste error). 	Agreed	Changes to be made as indicated.
			<p>Limits to Development mapping inconsistencies</p> <ul style="list-style-type: none"> Check that all buildings are included within the limits to development where they need to be. 	All appropriate buildings are within the Settlement Boundary	None
			<p>Policy numbering issues</p> <ul style="list-style-type: none"> Policy 25 is used for PRow but earlier text refers to Policy 25 as Important Open Spaces. Several policies change between upper/lower case or inconsistent prefixes (e.g., “POLICY 22” vs “Policy 22”). 	Agreed	Changes to be made as indicated.
			<p>Duplication of mapping figures</p> <ul style="list-style-type: none"> Figures 3, 4, 5 appear labelled inconsistently or used multiple times for different subjects. E.g Coventry Road Business Park and Village Centre both refer to Figure 4, Important Open Spaces does not refer to a figure in the policy, Wildlife Corridor is referred to as Figure 11 in the text, but is figure 10 	Noted. This will be checked prior to submission and amended where appropriate.	Change to be made as indicated.
			ACCESSIBILITY	Noted. It has always been the	None



				<p>Ensure the document meets the accessibility requirements for web browsing. All documents must meet the Web Content Accessibility Guidance (WCAG) 2.1: https://www.w3.org/TR/WCAG21/ Ideally electronic alternatives to PDFs such as HTML web pages and links to interactive maps should be provided</p>	<p>intention that the NP will be made accessible prior to submission.</p>	
				<p>Conservation Officer comments P.58 Fig 12 Would recommend checking that all sites shown on the map are accompanied by the HER reference as not all seem to be referenced, and check that they can be clearly read. The authors may wish to consider including the HER entry details in the way that they have for the non-designated heritage assets on p61. This will enable the reader to understand the detail of the entries.</p> <p>P.59 May wish to consider including a hyper link that takes the reader directly to the entry detail for each of the listed buildings. This will take the reader to the most up to date listing detail for the asset.(listing entries are periodically updated by Historic England).</p> <p>P.60 Fig 13 would benefit from the NHLE reference next to each of the dots so that it is clear where each entry is located.</p>	<p>Noted. We will update the map and correct the omission.</p> <p>We do not consider hyperlinks to be an effective tool and can become out of date.</p> <p>The Neighbourhood Plan endorses the local listings (NDHAs) in the</p>	<p>Change to be made as indicated.</p> <p>None</p> <p>None</p>



				<p>P.61 The inclusion of Policy 30 is welcomed. The Historic England Advice Note on Local Heritage Listing identifies best practice Local Heritage Listing: Identifying and Conserving Local Heritage Historic England</p> <p>In line with this guidance, the entries on pages 61-63 would benefit from a photograph of each entry to help the reader recognise and better understand the asset and why it is included.</p>	<p>Area already in the Leics. HER. Their detailed evidence base (and validation in the Planning system) is therefore already taken care of and repeating it here would be an unnecessary duplication.</p>	
				<p>P.65 Fig 15.3</p> <p>It is good to see that the information on ridge and furrow is based on a recent survey in 2024. If the results of the survey show differing quality in the ridge and furrow it would be useful to show this on the map in figure 15.3.</p>	<p>We consider the ‘quality’ of the few surviving instances to be difficult to measure. The policy is intended to identify and protect all surviving R&F in the Area.</p>	<p>None</p>



				<p>Climate Change Officer comments Broughton Astley:</p> <p>I attend meetings chaired by Cllr Clive Grafton-Reed. I am not entirely sure if it's a flood action group at this stage, but I am hoping that they will become one shortly. I have also contributed to the following:</p> <ul style="list-style-type: none">• Attended a drop-in flood event and represented HDC and the Harborough Woodland Trust.• Walk around sites affected by flooding with residents• Collaborated with the Environmental Agency (EA), Leicestershire County Council (LLC) Highways, Cllr Bill Piper, Lead Local Flood Authority (LLFA), Leicester, Leicestershire & Rutland Resilience Forum (LLR) looking into why flooding takes place and what mitigation can be put in place.• Met with the Parish Council (PC)• Organised additional sandbags to be delivered to the PC• Investigated other locations where sandbags can be stored so residents don't need to go through flood water to pick them up. Liaised with Parking Enforcement and the PC to see if the Orchard Road car park can be used.	<p>Noted.</p> <p>These actions are alongside the NP but not a part of it.</p>	<p>None</p> <p>None</p>
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				<ul style="list-style-type: none"> • Investigated with kind of storage would be needed if the sandbags are also going to be stored in the car park. • Investigated funding that could be used for the above • Put together an information pack for PCs around flooding • Put together an information pack for Flood Wardens around flooding, their roles and contacting agencies to report flooding and blocked road drains etc. • Purchased items for a flood warden equipment kit, such as torches, whistles, first aid kits • Purchased PPE (High-vis vests and jackets) for flood wardens • Designed a poster for recruitment of flood wardens 		
				<p>General Recommendations</p> <ul style="list-style-type: none"> • Clarity & Conciseness: <ul style="list-style-type: none"> ○ Use short, direct sentences in policies. ○ Move explanatory text to supporting justification, not policy wording. ○ Avoid duplication of Local Plan policies—cross-reference instead. 		



				<ul style="list-style-type: none">• Decision-making Detail:<ul style="list-style-type: none">○ Include measurable criteria (e.g., % affordable housing, minimum parking standards).○ Avoid vague terms like “appropriate” without defining what that means.• Flexibility:<ul style="list-style-type: none">○ Replace prohibitive language (“will not be permitted”) with positive framing (“will be supported where...”).○ Allow exceptions where national policy requires (e.g., Local Green Space, flood risk).• Conformity:<ul style="list-style-type: none">○ Reference Harborough Local Plan policies and NPPF principles.○ Ensure biodiversity net gain aligns with Environment Act 2021 (min 10% BNG). <p>Policy 1: Residential Site Allocation</p> <ul style="list-style-type: none">• Current: Allocates 138 dwellings at Witham Villas with design and footpath requirements.• Issues: Footpath detail could be considered too prescriptive and may not be the best option as part of the final design; lacks flexibility for layout.		
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			<ul style="list-style-type: none"> • Suggested Revision: <ul style="list-style-type: none"> ○ “Land at Witham Villas is allocated for approximately 138 dwellings. Development will be supported where it: <ul style="list-style-type: none"> ▪ Provides a housing mix in line with Policy 4; ▪ Demonstrates high-quality design in accordance with Policy 6 and Appendix C; ▪ Includes safe and convenient pedestrian and cycle connections to the village centre.” 	Agreed	Change to be made as indicated
		Policy 3	<p>Limits to Development</p> <ul style="list-style-type: none"> • Current: text could benefit from further clarity • Suggested Revision: <ul style="list-style-type: none"> ○ “Development within the Limits to Development (Figure 3) will be supported where it accords with this Plan and the Local Plan. Development outside these limits will be considered in line with countryside policies (Local Plan GD3, GD4) and Policy 23.” 	It is not considered that this reference to the Local Plan is necessary, especially with a new Local Plan at an advanced stage.	None
		Policy 3	<p>Windfall Housing</p> <ul style="list-style-type: none"> • Issues: Mentions “Sileby” and ‘Charnwood Borough Council’ (error); might be overly restrictive. • Suggested Revision: 	The policy is considered to be appropriate with the cut and paste errors removed.	Change to be made as indicated.



				<ul style="list-style-type: none"> ○ “Proposals for windfall housing within the Limits to Development will be supported where they: <ul style="list-style-type: none"> ▪ Respect local character and maintain important natural boundaries; ▪ Do not result in unacceptable loss of amenity; ▪ Provide adequate garden space and avoid overdevelopment.” 		
		Policy 4		<p>Housing Mix</p> <ul style="list-style-type: none"> • Suggested Addition: <ul style="list-style-type: none"> ○ “Schemes of 10+ dwellings must demonstrate how they meet identified needs for smaller homes and accessible housing, as set out in the latest Housing Needs Assessment.” 	We do not consider that this adds anything to then existing policy.	None.
		Policy 5		<p>Affordable Housing</p> <ul style="list-style-type: none"> • Align with Local Plan H2: <ul style="list-style-type: none"> ○ “At least 40% affordable housing will be required on sites of 10+ dwellings, subject to viability. Tenure mix should reflect local evidence and Harborough Local Plan guidance.” 	Agreed. We will amend the ratios to require adherence to the most recent evidence of housing need.	Change to be made as indicated.



		Policy 6		<p>Design</p> <ul style="list-style-type: none"> • Condense: <ul style="list-style-type: none"> ○ “Development should demonstrate high-quality design that reflects local character and follows the Design Guide (Appendix C). Applications must include a Design Statement referencing the Guide.” 	<p>We consider the policy to be appropriate as it is.</p> <p>Not all applications require a design statement.</p>	None
		Policy 7 & 8		<p>Village Centre & Parking</p> <ul style="list-style-type: none"> • Simplify: <p>“Proposals that maintain or enhance the vitality of the Village Centre will be supported. Parking provision should meet Leicestershire County Council standards and avoid worsening existing issues.”</p> 	<p>We consider the policy to be appropriate as it is.</p>	None
		Policy 9-12		<ul style="list-style-type: none"> • Ensure flexibility: <ul style="list-style-type: none"> ○ “Proposals for employment development will be supported where they are of a scale and type appropriate to their location, do not harm residential amenity, and respect local character.” 	<p>We consider the policies to be appropriate as they are.</p>	None
		Policy 20-31		<ul style="list-style-type: none"> • Local Green Space (Policy 21): <ul style="list-style-type: none"> ○ Use NPPF wording: “Development will not be supported except in very special circumstances.” 	<p>Agreed</p>	Change to be made as indicated.



			<p>HOUSING REQUIREMENT Local Plan (Policy DS01) requirement for Broughton Astley: 475 dwellings (2020–2041) allocated at BA1 – Frolesworth Road. Neighbourhood Plan position: The BANP introduces a new allocation at Witham Villas (138 dwellings) in addition to the Local Plan’s 475-dwelling allocation.</p> <p>Reg. 14 Comment The Neighbourhood Plan may allocate additional sites to the Local plan, and states that by allocating 138 dwellings at Witham Villa the NP <i>‘will help ensure that as the housing requirement for the Neighbourhood Area changes over the Plan Period, sufficient provision is made locally to meet a local housing need in a locally appropriate location’</i></p>	Noted	None
			<p>2 LIMITS TO DEVELOPMENT PSLP Policy AP01 defines development principles for settlements in the hierarchy. BANP Introduces its own Limits to Development (LTD) boundary:</p> <ul style="list-style-type: none"> • Whilst HDC is generally supportive of limits to development, the LTD as drawn does not incorporate the full extent of the BA1 site. 	<p>Noted. The policy will be reworded to support the Local Plan allocation.</p> <p>It is not appropriate to extend the boundary to accommodate the Local Plan</p>	Change to be made as indicated.



			<ul style="list-style-type: none"> The NP's LTD wording is stricter than the proposed Local Plan, which provides for windfall, infill, rural exception housing etc. LTD does not make clear that Local Plan strategic allocations will take precedence over the LTD. <p>Reg. 14 Comment The NP's Limits to Development boundary and policy wording might be considered to fall outside conformity with strategic policies DS01 and AP01, as they exclude parts of the strategic BA1 allocation. Limits to Development should incorporate the strategic site boundary and offer some flexibility for proposals that adjoin the boundary or are for acceptable development. The District Council is willing to work positively and collaboratively with the Qualifying Body to consider how best this issue can be addressed, including further work on the Memorandum of Understanding.</p>	allocation because if the NP is Made before the LP is Adopted, the presumption in favour of development will apply and the site may gain a planning approval without the LP conditions which manage its development.	
			<p>EMPLOYMENT LAND PSLP (Policy DS02, K2, BA1 context)</p> <ul style="list-style-type: none"> Strategic employment land is focused at Magna Park, Market Harborough and Kibworth. There is no new strategic employment requirement for Broughton Astley. <p>BANP Includes policies supporting new employment on:</p>	Noted	None



			<ul style="list-style-type: none"> • Cottage Lane Industrial Estate • Estley Green • Coventry Road Business Park <p>Reg. 14 Comment Policies 9–12 enable types and locations of employment development that exceed what is supported in strategic policies DS02, AP04 and the employment land distribution. These policies will expand employment land beyond the strategic approach. This is a matter that BANP has considered important and with evidence can be included.</p>		
			<p>LOCAL GREEN SPACES</p> <p>PSLP Contains its own LGS assessment methodology and Appendix 4 designations.</p> <p>BANP Designates:</p> <ul style="list-style-type: none"> • 5 new Local Green Spaces • Circa 52 “Important Open Spaces” <p>Issues:</p> <ul style="list-style-type: none"> • NP LGS methodology has been set out. • “Important Open Spaces” risk duplicating DM05 (GI). <p>Reg. 14 Comment Local Green Space designations appear supported by sufficient evidence. Several proposed open spaces may</p>	Noted	None



				duplicate the policy of DM05 although this has been highlighted in the policy text		
				<p>AREAS OF SEPARATION</p> <p>PSLP</p> <p>Designates AoS between:</p> <ul style="list-style-type: none"> • Bitteswell–Lutterworth–Magna Park • Oadby–Great Glen • Ullesthorpe–Magna Park <p>BANP</p> <p>Proposes:</p> <ul style="list-style-type: none"> • AoS between Broughton Astley & Sutton-in-the-Elms • AoS extended toward Dunton Bassett <p>Issues:</p> <ul style="list-style-type: none"> • BANP designates AoS beyond strategic AoS locations, and could be into areas where the Local Plan sets out countryside flexibility (AP03/AP04). • Test of “prevent coalescence” appears more restrictive than PSLP wording (“avoid harmful reduction in separation”). <p>Reg. 14 Comment</p> <p>The BANP’s AoS extensions appear more restrictive than the Local Plan. Care should be taken that they will not be overly restrictive on future growth.</p>	The policy allows development in the AofS conditional on it	None



				<p>FLOOD RISK POLICY PSLP DM07 and DM08 provide the strategic parameters. BANP Policy 28 applies strict tests:</p> <ul style="list-style-type: none"> • Requires proof of “no alternative site” for all development in flood-susceptible areas (not in NPPF/DM07). • Requires “benefits outweighing harm” tests aimed at strategic infrastructure scale, not minor applications. • Requires mandatory biodiversity net gain wording, duplicating and altering DM10. <p>Reg. 14 Comment BANP Policy 28 exceeds the scope of neighbourhood planning by adding flood risk decision tests not in DM07/DM08 or national policy to all developments of one or more dwellings. This is likely to be considered too restrictive by an examiner as the NP must not apply tighter strategic standards set out in national policy.</p>	<p>not causing the coalescence of the two settlements or compromising their separation.</p> <p>Noted. The BANP flood risk policy will be updated to 205-6 metrics, etc</p>	<p>Change to be made as indicated</p>
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				<p>BROADBAND, ELECTRIC VEHICLES, COMMUNITY INFRASTRUCTURE</p> <p>BANP Policies 15–19 duplicate or overlap with PSLP policies:</p> <table border="1"> <thead> <tr> <th>BANP Policy</th> <th>PSLP</th> </tr> </thead> <tbody> <tr> <td>Schools expansion (16)</td> <td>DS05 – NP introduces additional requirements on mitigation & parking</td> </tr> <tr> <td>Broadband (17)</td> <td>DM09 – NP wording implies obligatory FTTP regardless of viability</td> </tr> <tr> <td>Infrastructure (19)</td> <td>DS05 – NP must not list contributions in a way that either</td> </tr> </tbody> </table>	BANP Policy	PSLP	Schools expansion (16)	DS05 – NP introduces additional requirements on mitigation & parking	Broadband (17)	DM09 – NP wording implies obligatory FTTP regardless of viability	Infrastructure (19)	DS05 – NP must not list contributions in a way that either	The NP policies are considered appropriate with minor modifications.	None
BANP Policy	PSLP													
Schools expansion (16)	DS05 – NP introduces additional requirements on mitigation & parking													
Broadband (17)	DM09 – NP wording implies obligatory FTTP regardless of viability													
Infrastructure (19)	DS05 – NP must not list contributions in a way that either													



				<p>overrides IDP or</p> <p>conflicts with</p> <p>strategic evidence</p> <p>of need</p>		
				<p>Reg. 14 Comment</p> <p>NP policies should avoid duplication of strategic policies or amendment of strategic infrastructure requirements. Several policies could be redrafted to ensure they are in accordance with DS05 and DM09.</p>		
22			<p>Mark Harris – Bidwells (Taylor Wimpey)</p>			
				<p>My client considers that the Neighbourhood Plan does not meet the basic tests set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. These basic conditions are also detailed at Paragraph: 065 of the National Planning Practice Guidance (PPG).</p> <p>Only conditions a, and d-g apply to a Neighbourhood Development Plan (conditions b and c relate to Neighbourhood Development Orders only). These are:</p>	Noted	None



				<ul style="list-style-type: none"> ● Condition A: having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan). ● Condition D. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development. ● Condition E. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). ● Condition F. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations. ● Condition G. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan). 		
				<p>Compliance with Emerging Local Plan It is noted that Harborough District Council are in the process of preparing a new Local Plan. A Regulation 19 consultation on the Proposed Submission Draft Harborough Local Plan 2020–2041 March-May 2025. This plan is expected to be submitted for Public Examination in Spring 2026. It is therefore considered that moderate weight can be attached to the plan at this time.</p> <p>The Planning Practice Guidance (“PPG”) is clear that where a neighbourhood plan is brought forward before an up-to-date local plan is in place that the qualifying body and the</p>	<p>Noted. The NP will be examined against the Adopted Local Plan, not the emerging LP.</p> <p>This has happened. The latest evidence of housing need has</p>	<p>None</p> <p>None</p>



			<p>local planning authority should discuss and aim to agree the relationship between policies in the emerging neighbourhood plan, the emerging local plan and the adopted development plan (Paragraph: 009 Reference ID: 41-009 20190509). No information has been provided as part of the available evidence base documents supporting the plan which indicates any interaction having occurred between the Neighbourhood Plan Steering Group and the Local Planning Authority (“LPA”) to this effect.</p> <p>On a related note, whilst in the PPG a draft neighbourhood plan is stated as having to be in general conformity with the strategic policies of the development plan, the reasoning and evidence informing the emerging local plan process are noted as likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested (Paragraph: 009 Reference ID: 41-009-20190509).</p> <p>However, questions have to be raised about whether the emerging Neighbourhood Plan has given sufficient regard to such evidence base. The Housing Needs Assessment (dated January 2023) underpinning the emerging Neighbourhood Plan should have at least referenced the evidence work undertaken as part of the emerging Local Plan in its determination to utilise the housing numbers identified in the Adopted Local Plan (text at 101 – 104). Further, there are examples of supporting evidence work for the emerging Neighbourhood Plan becoming out of date/not being updated following new evidence documents being prepared in relation to the emerging Local Plan e.g.</p>	<p>been used and regular discussions have taken place between the QB and the LPA.</p> <p>Noted</p> <p>The HNA has been used to determine policies on housing mix and affordable housing.</p> <p>HDC has provided information related to the housing requirement.</p>	<p>None</p> <p>None</p> <p>None</p>
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			<p>there was a SHELAA Update in 2024, but the Site Options and Assessment report is dated July 2023.</p> <p>We would also question the fact that the proposed Local Plan allocation off Frolesworth Road is not identified on the Policies Map in the Neighbourhood Plan. This site meets the housing requirement of 475 dwellings in policy DS01 of the Local Plan – a figure that the Neighbourhood Plan is not addressing.</p> <p>It is fine for the Neighbourhood Plan to propose more development than proposed in the Local Plan, but this 475 dwellings needs to be planned for and identified for the Neighbourhood Plan for the documents to be consistent. Equally, the impacts of planning and delivering for both sites needs to be considered, Without this consideration, there is a lack of compliance between the two documents and it cannot be concluded that the proposed allocation is suitable in the context of wider plans for the village.</p> <p>Questions have to be raised as to whether the emerging Neighbourhood Plan fails to meet basic condition A (national policy and guidance).</p> <p>Site Assessment and Selection Process</p>	<p>The NP references this LP allocation appropriately. It remains subject to examination so cannot be included in the NP at this stage.</p> <p>This is not the case. It is not for the NP to plan for the allocation of a Local Plan site.</p> <p>We disagree and no evidence is provided to the contrary.</p>	<p>None</p> <p>None</p> <p>None</p>
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			<p>My client has concerns regarding how the site assessment and selection process has been conducted.</p> <p>Firstly, my client would question why only 7 sites were presented to the general public as part of the public consultation exercise in August/September 2025. At 5.2 of the Site Options and Assessment document (July 2023), it was clearly stated that 11 sites were suitable for allocation. At 4.3 of the draft Neighbourhood Plan, the comprehensive nature of this assessment work is lauded, with it being stated 'As part of the preparation of the Review Neighbourhood Plan, a comprehensive site assessment process was undertaken by AECOM'. However, no explanation has been given as to why the subsequent public consultation saw only 7 sites out of the 11 identified in this document put to the public. The justification behind this decision has not been included as part of the evidence base for the emerging Neighbourhood Plan.</p> <p>Further, the information that was presented to the public as part of this consultation did not represent the full extent of information available to the Neighbourhood Plan Steering Group. The public were instead provided with a basic proforma extracted from the HDC SHELAA, which provided very limited information about the site options. This did not allow the public to take an informed view on which sites could deliver sustainable development. Prior to this consultation occurring, Taylor Wimpey provided the Neighbourhood Plan Steering Group with detailed information on the design and vision for their site, including</p>	<p>All available sites were considered – large sites were divided into 2 for assessment purposes and 2 sites had subsequently received a planning approval.</p>	<p>None</p>
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			<p>public benefits offered. This information included technical work on site constraints/ opportunities, which is particularly notable as there are constraints that can be addressed through mitigation work (e.g. drainage matters). The failure to include this information will have influenced public opinion regarding the site.</p> <p>My client has also noted instances where the information presented as part of this previous consultation misrepresented sites. For example, Taylor Wimpey's site, 'Land east of Frolesworth Road', was previously promoted for residential development as part of the emerging Harborough Local Plan and the information from the associated SHELAA was subsequently carried through to the site assessment/selection process for the emerging Neighbourhood Plan.</p> <p>However, as part of the SHELAA HDC failed to consider an alternative site area which was submitted to them as part of this process, despite my client flagging this omission. Whilst the Neighbourhood Plan sought to address this matter, after it was again flagged by my client, by consulting on the correct, reduced site area as part of this consultation (by indicating an area for consideration on the red line plan), the supporting text was not updated. As a result, the site information, opportunities and constraints presented to the public did not reflect the area actually under consideration. Of particular concern is that the public were told that the reduced site was being promoted for circa 360 dwellings instead of 150 dwellings. This has</p>		
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			<p>the potential to have directly influenced how the public perceived the site as part of the consultation process.</p> <p>Following the above consultation in 2025, it is noted that 4 sites were considered to be favoured by the public. However, the process of arriving at the single allocation 'Witham Villa' after this point has not been properly documented.</p> <p>The 'Statement To Support Housing Development Allocation In Neighbourhood Plan' document states the following: 'From the seven sites presented, four emerged as the most positively received by the community. These preferred sites were then subject to detailed, objective assessment against criteria including transport connectivity, site access, landscape impact, flooding considerations, and overall deliverability.'</p> <p>The 'Outcome Of Public Consultation On Housing Site Options' document adds very little additional detail on this process, stating: 'After reviewing all comments and observations from residents, Witham Villa has been selected by the Parish Council as the preferred site for allocation within the emerging Neighbourhood Plan. This site performed strongly across the assessment criteria and aligned well with the community's feedback.'</p> <p>However, this assessment work has not been published as part of the evidence base nor has any detail been provided in terms of public comments made as part of the public</p>		
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			<p>consultation work. Further, Taylor Wimpey would question why this detailed site assessment work was undertaken after the consultation in question as this would have allowed the public to make more informed responses on their site preferences.</p> <p>The PPG is clear that ‘Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order’ (Paragraph: 040 Reference ID: 41-040-20160211). As it stands, my client would assert that the Neighbourhood Plan Steering Group have failed to evidence the decision process underpinning the emerging Neighbourhood Plan, as well as provide robust evidence to allow choices to be made by the public.</p> <p>My client considers that the emerging Neighbourhood Plan fails to comply with conditions A (national policy and guidance) and D (sustainable development).</p>	<p>The assessment process was thorough and transparent and meets the regulatory requirements.</p>	<p>None</p>
			<p>Land east of Frolesworth Road</p> <p>Taylor Wimpey are promoting Land east of Frolesworth Road as a site for residential development.</p> <p>The site presents an exciting opportunity to deliver a high quality, sustainable, landscape-led scheme on the southern side of Broughton Astley. The scheme will provide</p>	<p>Noted.</p> <p>This site is not an allocation in the NP therefore this</p>	<p>None</p> <p>None</p>



			<p>extensive areas of publicly accessible green space, offering a significant village-wide benefit, and new homes within a high-quality landscaped setting, which will be based upon sustainable and healthy lifestyles and designed for climate resilience and adaptation.</p> <p>The specific benefits of the scheme include the following:</p> <ul style="list-style-type: none"> • 150 new market and affordable high-quality, energy efficient homes. • Extensive area for ecological enhancements including wildlife ponds and wildflower meadows. • New play areas and opportunities for a trim-trail and exercise stations. • Large areas of public open space for informal play. • Community allotments. • Community orchard. • A Sustainable Urban Drainage system as part of multi-functional open spaces. • New footpath and cycle connections to facilitate healthy lifestyles. • Provision of homes within walking distance to a range of local amenities and services within the village and surrounding area. • Support local amenities and services by increasing the number of potential customers in the area and ensure greater vitality to the village and surrounding area. • Other potential social benefits through infrastructure improvements (for example towards public transport) for the use of the wider population in the locality of the site. • Creation of jobs through construction and related supplies. 	<p>information is not relevant.</p> <p>It is quite common for the promoters of a site to say that their site is better, but this is not an independent assessment.</p>	
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				<p>A Vision and Delivery Statement was previously submitted through Harborough District Council's call for sites and provided to the Parish Council back in Summer 2024. The Vision and Delivery Statement sets out the core placemaking principles for the proposed development of the site and includes an Illustrative Masterplan, which shows how the above benefits will be provided, delivering a long-lasting positive addition to Broughton Astley. The site is available immediately and free from any technical constraints which would preclude its early delivery.</p> <p>Proposed residential development of the site will provide significant benefits including contributing towards the market and affordable housing needs of Harborough District and Broughton Astley. The site contributes towards early stages of the Council's housing land supply in the plan period for both the Neighbourhood Plan review and the emerging new Harborough Local Plan. The proposed development of the site will also contribute towards supporting the local economy.</p> <p>The proposed extensive areas of public open space, alongside community allotments and a community orchard, is a significant community benefit that will be delivered alongside the proposed homes.</p> <p>Any future planning application would include a detailed package of technical information to demonstrate that the proposed development will not result in any significant</p>		
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			<p>harm to matters of acknowledged importance, such as highway impacts, flooding, ecology, arboriculture, landscape and visual amenity, built heritage or below-ground archaeology.</p> <p>Whilst it is noted that a number of Listed Buildings are located further to the north of the site, it is considered that a sensitively designed scheme can be brought forward in order to reduce any potential identified heritage harm.</p> <p>The proposals for the site would take a sensitive approach to development to reflect the existing landscape and would be supported by landscape and visual impact assessment work. The proposals would bring forward a sensitive landscaping scheme alongside the proposed development. Our view is that development on this southern side of the village would avoid less intrusion into the wider landscape than developments in other areas around the village due to the level of existing enclosure, which can be appreciated from within the site.</p> <p>Existing Public Rights of Way (PRoW) run through parts of the site and would be retained and enhanced as part of the proposed development of the site.</p> <p>There are no known ecological constraints to development of the site work and suitable mitigation can be provided alongside measures for biodiversity net gains.</p>		
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			<p>According to the EA (Environment Agency) Flood Map for Planning, the site is primarily located in Flood Zone 1 (low probability of flooding from rivers and sea). There are areas of Flood Zone 2 and 3 within the south-east of the site and along the eastern boundary, attributed to the Broughton Astley Brook and a tributary of the Brook.</p> <p>EA Risk of Flooding from Surface Water Mapping shows areas with a low to high probability of flooding in the north of the site, with areas of ponding formed from shallow overland flows from the south.</p> <p>Hydraulic modelling has been undertaken and confirms the fluvial and surface water flood risk within the site. Following the baseline hydraulic modelling potential mitigation measures are to be reviewed to ensure a betterment on the existing situation as a result of the development.</p> <p>Surface water runoff from the proposed development will be managed on site through the implementation of a sustainable drainage strategy. Surface water will be stored within Sustainable Drainage System (SuDS) designed to accommodate the 1 in 100-year storm including an allowance for climate change. The SuDS features will also be designed to provide additional water quality, biodiversity and amenity benefits.</p> <p>Surface water runoff from the site will be appropriately restricted to the equivalent greenfield runoff rate. Under typical rainfall events this will mimic the existing runoff rate,</p>		
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			<p>but in larger storm events this will represent a reduction, thereby offering downstream betterment.</p> <p>A foul water management strategy would also be proposed demonstrating discharging to the existing network through consultation with Severn Trent Water to confirm a preferred point of connection.</p> <p>It is considered that any traffic increases would not have a detrimental impact on the operation of the local highway network and surrounding junctions would have sufficient capacity. Transport assessment and technical highways work would support the development proposals. It is noted that the impact of any increase in traffic from the development of 150 homes east of Frolesworth Road would be significantly less than that of 475 homes currently proposed for allocation to the west in the Local Plan. It can be demonstrated that safe and suitable proposed vehicular access is achievable to the site from Frolesworth Road. The proposed development will also connect to the existing footpath along Frolesworth Road to allow safe and suitable pedestrian access between the site and local amenities and services in Broughton Astley. Access would also be available of foot to the north via the footpath that connects the site to Church Close and onwards to Station Road.</p> <p>The site is located in an accessible location within walking/cycling distance to a wide range of local amenities and services in Broughton Astley including a variety of</p>		
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			<p>different types of retail/shops, primary and secondary education, pre-school/nursery, pubs/café/restaurants, healthcare, veterinary, other small local businesses and local bus services to neighbouring villages, town and the City of Leicester.</p> <p>The site represents an available, developable, suitable and achievable site for residential development allocation to support the necessary market and affordable housing needs in both the Neighbourhood Plan review for Broughton Astley and also the emerging new Harborough Local Plan.</p> <p>The fact that HDC are proposing to allocate land to the west of Frolesworth Road as part of the emerging Local Plan demonstrates that this southern side of the village generally represents an appropriate location for development. This includes recognising that there is capacity in the local highway to accommodate the impacts of a significantly higher level of growth than would take place on the Taylor Wimpey site.</p> <p>As touched on above, this southern side of the village represents a more enclosed landscape than that to the north and east of the village which are more open in character meaning development of these sites would have a greater impact.</p> <p>Taylor Wimpey's site is well enclosed and could be developed without significant harm to landscape character and the overall character of the village.</p>		
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				In summary, we consider that Land east of Frolesworth Road is a) in the most suitable and sustainable area for development in the village and b) is the most suitable site for allocation, particularly due to the likely negative impacts of the scale of development currently proposed. As such, we consider that the site would be a more appropriate allocation than the proposed to be made in the Neighbourhood Plan.		
23			Jake Horton Marrons/ Davidsons Developments)			
		General		<p>The Site has been actively promoted through earlier stages of consultation associated with the Broughton Astley Neighbourhood Plan Review process. In particular, representations were submitted on behalf of Our Client in response to the ‘Areas of Development’ consultation undertaken by BAPC in October 2025. Those representations set out clear and reasoned justification for the Site’s inclusion, demonstrating that it was capable of contributing positively towards meeting housing needs within Broughton Astley.</p> <p>Notwithstanding this, the draft BANP Review does not allocate the Site, and it appears that the Parish Council has chosen not to progress in this direction. This is of concern given that the site assessment evidence base underpinning the BANP has not been substantively updated since 2023</p>	<p>Noted.</p> <p>The site options assessment was undertaken and concluded as part of the NP process at an appropriate stage.</p>	None



				and does not reflect the significant body of technical work that has since been undertaken to support the Site. The continued omission of the Site therefore risks the Plan being insufficiently justified and not based on the most up-to-date evidence available.		
				<p>Site Context and Characteristics</p> <p>The Site area extent to which Davidsons are wishing to promote extends to approximately 4.1 hectares of agricultural land on the eastern edge of Broughton Astley, immediately north-east of Davidsons' existing residential development off Blockley Road. The route of the former disused Midland Railway Line lies to the west, beyond which is the established built-up area of the village. The Site is therefore well related to the existing settlement and represents a logical location for residential growth. This site area could be increased should the BANP area wish to allocate the site for a wider dwelling total.</p> <p>The Site is well contained by established physical and built features. It is enclosed by hedgerows and intermittent mature trees, with existing farm buildings to the north and residential development to the south and south-east. These features create clear and defensible boundaries and enable the Site to be sensitively integrated into its landscape setting.</p> <p>The surrounding area comprises a varied mix of housing types from varying periods, including recent residential</p>	Noted. The site is not selected as an allocation in the NP and therefore this information is not relevant.	None



			<p>development at Blockley Road and Fretter Close. This mixed context demonstrates the Site's capacity to accommodate new housing that respects and complements the character of Broughton Astley.</p> <p>The Site benefits from good accessibility to services and facilities within Broughton Astley, including shops, education, leisure and employment opportunities. It is located approximately 200 metres from a bus stop served by the Arriva 84 service, providing hourly connections to Leicester and Lutterworth. Narborough railway station is located around 4.5 miles away and is accessible by a range of transport modes.</p> <p>Access to the Site is proposed from Blockley Road, extending the existing access arrangements serving the adjacent Davidsons development. Pedestrian and cycle connections will also be provided.</p> <p>The Site lies within Flood Zone 1 and is not subject to fluvial flood risk. Surface water matters have been fully assessed through the submitted Flood Risk Assessment and Drainage Strategy as part of the outline planning application, with Sustainable Urban Drainage Systems proposed to manage runoff, provide attenuation and deliver wider environmental benefits.</p>		
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			<p>d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;</p> <p>e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and</p> <p>f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area”. 8 922993.56 Representations to the Broughton Astley – (Neighbourhood Plan Review) on behalf of Davidsons Developments</p> <p>Planning Practice Guidance (‘PPG’) states in Paragraph: 009 (Reference ID: 41-009 20190509) that:</p> <ul style="list-style-type: none">• “Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested”.• “Where a neighbourhood plan is brought forward before an up-to-date local plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:<ul style="list-style-type: none">o the emerging neighbourhood plano the emerging local plan (or spatial development strategy)o the adopted development plan”.• “The local planning authority should work with the qualifying body so that complementary neighbourhood and		
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			<p>local plan policies are produced. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies.”</p> <p>Paragraph 32 of the NPPF requires the preparation and review of all policies to be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned.</p> <p>Paragraph 38 of the NPPF explains that Neighbourhood Plans must meet certain ‘basic conditions’ and other legal requirements before they can come into force. These are tested through an Independent Examination before a Neighbourhood Plan may proceed to referendum.</p> <p>The seven ‘basic conditions’ are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990, as quoted by PPG Paragraph (065 Reference ID: 41-065 20140306) these are:</p> <ul style="list-style-type: none">a) “Having regard to National Policies and Advice contained in guidance issued by the Secretary of State;b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses;c) Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area;		
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			<p>d) The making of the Neighbourhood Plan contributes to the achievement of sustainable development;</p> <p>e) The making of the Neighbourhood Plan is in general conformity with the strategic policies contained in the Development Plan;</p> <p>f) The making of the Neighbourhood Plan does not breach, and is otherwise compatible with, EU obligations; and</p> <p>g) Prescribed conditions are met in relation to the Neighbourhood Plan and prescribed matter have been complied with in connection with the proposal for the Neighbourhood Plan”.</p> <p>With the above Neighbourhood Plan making legislative framework in mind, our Client’s representations are intended to be helpful to the Parish Council in so far as suggestions are made on the plan’s policies and content to ensure it meets the basic conditions as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as applied to Neighbourhood Plans by section 38A of the Planning and Compulsory Purchase Act 2004).</p>		
		Policy 1	<p>Residential Site Allocation:</p> <p>Policy 1 seeks to allocate land for residential development within Broughton Astley.</p> <p>Concern is raised regarding the approach taken to site selection and the resulting quantum of housing to be allocated, which does not appear to be underpinned by sufficiently robust, up-to-date or proportionate evidence.</p>	Noted. Various options were considered before the Qualifying	None



			<p>The ‘Areas of Development’ consultation exercise undertaken by BAPC in October 2025, framed the discussion around whether the village should support Harborough District Council’s emerging Regulation 19 Local Plan (2020 – 2041) allocation BA1 – Land off Frolesworth Road (for 475 dwellings), or whether growth should instead be distributed across several smaller identified sites. The consultation feedback published in the “Statement to support housing development1” appears to have demonstrated support for the principle of smaller allocations. However, notwithstanding this direction of travel, the draft BANP has progressed only a single allocation at Witham Villas (for 138 dwellings), without clear justification as to why other suitable, deliverable sites promoted through the same process, including land east of Dunton Road, have not been taken forward.</p> <p>This approach raises further concern when considered against the strategic housing context. While Harborough District Council’s emerging Regulation 19 Local Plan (2020 2041) identifies Broughton Astley as a sustainable location for growth and allocates 475 dwellings at BA1, the draft BANP departs from this spatial strategy by allocating a significantly lower quantum of housing without demonstrating that this alternative approach will continue to support the delivery of strategic policies, as required by paragraph 16 of the 2024 NPPF. In circumstances where the emerging Local Plan (2020 2041) itself may be subject to examination issues, including those relating to housing requirement calculations under the revised standard</p>	<p>Body settled on a single allocation based on the latest evidence of housing need.</p> <p>This paper will be available at submission</p> <p>The NP allocation, alongside the Local Plan allocation, exceeds the minimum housing requirement.</p>	<p>Changes to be made as indicated.</p> <p>None</p>
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			<p>method, it is particularly important that the BANP does not constrain delivery through an overly limited allocation strategy. The allocation of only 138 dwellings at Witham Villas does not therefore, on its own, provide sufficient flexibility or resilience and risks failing to positively support strategic housing objectives.</p> <p>Further, the evidence base underpinning Policy 1 is considered to be materially out of date. Supporting Appendix B – ‘Site Options and Assessment2’ prepared by AECOM relies on information last updated in July 2023, despite the submission of representations and evidence by Our Client in support of the revised site at Dunton Road, as part of the October 2025 consultation. Paragraph 32 of the NPPF is clear that policies must be underpinned by relevant and up-to-date evidence, adequate and proportionate to justify the policy approach taken. In this case, it appears that site selection has been influenced disproportionately by consultation responses rather than by an objective reassessment of technical suitability. This is particularly evident given that AECOM’s assessment of (Land east of Dunton Road (SHLAA Ref: 21/8249) concluded that, based on the available information, the site should be considered suitable for development.</p> <p>Since that time, Harborough District Council has published its updated Strategic Housing and Economic Land Availability Assessment (SHELAA) 2024, which provides the most current and relevant evidence. The SHELAA confirms that the site is located adjacent to the existing built-up</p>	<p>The site selection process was complex and comprehensive. There has to be a cut-off point and the site selected as an allocation has secured community support.</p> <p>It is understood that the site promoter wishes for its own site to be an allocation in</p>	<p>None</p> <p>None</p>
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			<p>area, is free from insurmountable constraints, has a single landowner, is under option to a developer, and has a reasonable prospect of delivery. It concludes that the site is deliverable within five years, with no market, viability or delivery barriers identified. Importantly, identified landscape issues have now been addressed through the submitted outline planning application and smaller quantum of development of up to 90 dwellings. The failure of the draft BANP to take account of this updated SHELAA evidence, or the reduced scale of development now proposed represents a clear gap in the justification for the allocations in Policy 1.</p> <p>In light of the above it is considered that Policy 1 should be amended to include consideration of the additional residential allocation at land east of Dunton Road, which can provide a flexible number of units in order to help meet the wider identified needs of the area. The Site is well related to the settlement, demonstrably deliverable within the BANP period, Allocation of the Site would materially strengthen the justification and effectiveness of the BANP and improve its ability to meet the Basic Conditions.</p>	<p>the NP, however the process was robust and independent, and an alternative allocation has been Chosen.</p> <p>We disagree.</p>	<p>None</p>
		Policy 2	<p>Limits to Development</p> <p>Policy 2 seeks to define a 'Limits to Development' for Broughton Astley in order to guide where new development should be directed with anything outside of the defined limits being considered as open countryside.</p>	<p>Noted. The NP Review allocation exceeds the minimum housing</p>	<p>None</p>



			<p>Given the ongoing Harborough Local Plan Review and the direction of travel expressed through the October 2025 BANP consultation, which had a particular interest in identifying a number of smaller sites, our client believes there may be benefit in allowing some flexibility at the settlement edge. The Site sits immediately adjacent to the built-up area and is contained by strong landscape features. In this respect, it represents a logical and well defined extension to the settlement that could help support the BANP wider growth strategy over the plan period.</p> <p>As previously mentioned, the site offers a potential development scenario for up to 125 units and can be master planned in a way that respects the character and scale of Broughton Astley while delivering meaningful community benefits and infrastructure. Reflecting this context within the settlement boundary would give the BANP additional flexibility and support its long-term robustness, particularly as the emerging Harborough Local Plan progresses.</p> <p>Our Client therefore welcomes ongoing dialogue with the Parish Council and considers that the site presents a positive opportunity to reinforce BANPs spatial strategy, either through an adjustment to the Limits to Development or as a defined planned allocated extension.</p>	<p>requirement for the Neighbourhood Area and is not, therefore, required to offer greater flexibility as suggested here.</p>	
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		Policy 4	<p>Policy 4 seeks to ensure that new residential development delivers an appropriate mix of housing types informed by the most up-to-date evidence of local housing need, which for the BANP has been based from the Broughton Astley Housing Needs Assessment (2023)3.</p> <p>Our Client believes that it is important to note that Policy 4 should be applied with sufficient flexibility, particularly in respect of the expectation that schemes of 10 or more dwellings must demonstrate how they will meet the needs of older households, “especially bungalows”. While the Housing Needs Assessment (2023) identifies an ageing population and a general demand for accessible housing, it does not justify a prescriptive requirement for specific dwelling typologies on all qualifying sites. National policy is clear that housing mix policies should allow for site-specific design responses and viability considerations, particularly where proposals are brought forward in outline form.</p> <p>In this regard, the promotion of bungalows should not be treated as the sole or primary means of meeting the needs of older residents. Alternative forms of accommodation can respond effectively to identified needs whilst also allowing for a more efficient use of land. This approach is consistent with national guidance, which seeks to increase choice and flexibility rather than mandate uniform solutions.</p> <p>Accordingly, it is recommended that the policy is applied in a non-prescriptive and flexible manner, allowing housing mix, including provision for older households, to be</p>	<p>Noted.</p> <p>Flexibility is built into the policy by reflecting the HNA ‘or more recent document ...’</p>	None
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				determined through detailed design and viability considerations at the application stage. This approach would ensure that Policy 4 remains effective, deliverable and consistent with national policy, while enabling sustainable and well-designed development to come forward.		
	Policy 13			<p>Traffic Management</p> <p>Policy 13 seeks to ensure that new development is supported by appropriate transport infrastructure and promotes sustainable travel, while avoiding unacceptable impacts on the local and strategic highway network.</p> <p>The Site at Dunton Road is capable of responding positively to these requirements, given its proximity to existing residential areas, services and facilities, and its relationship with established transport routes. However, it is important that the policy is applied in a proportionate and flexible manner, particularly where development proposals are brought forward in outline form.</p> <p>In this regard, it is noted that criterion (a) refers to the cumulative impact of development on traffic flows. Consistent with national policy, it should be made clear that impacts should only be considered unacceptable where they are ‘severe’ and that mitigation measures should be sought where they are feasible and are directly related to the development. This approach ensures that Policy 13 does not inadvertently introduce a more onerous test than that set out in national guidance.</p>	<p>Noted.</p> <p>Criterion a) already references the need for traffic flows to be severe for the policy to apply.</p>	None



	Policy 22			<p>Site and Features of Natural and Environmental Significance</p> <p>Policy 22 seeks to protect sites and features of local natural environment significance and to ensure that development delivers measurable biodiversity net gain.</p> <p>The Site at land east of Dunton Road does not affect the Disused Midland Railway Line, which is identified as a site of natural environment significance on Figure 7 of the draft BANP and can be brought forward without adverse impacts on designated or locally significant ecological features. The Site is capable of delivering biodiversity net gain in accordance with Policy 22 and national requirements, ensuring that the policy’s objectives can be fully met</p>	Noted. As the site is not a residential allocation in the NP, this comment is irrelevant.	None
	Policy 23			<p>Countryside</p> <p>Policy 23 seeks to protect the countryside for its intrinsic character, beauty and environmental value.</p> <p>Our Client has concerns with the wording of the policy relating to development being ‘strictly controlled’ where it is in the Countryside (i.e outside the proposed ‘Limits to Development’ set out in Policy 2). This wording risks applying an unduly restrictive approach which is not fully aligned with national policy. Paragraph 16 of the NPPF (2024) requires plans to be prepared positively, with the objective of contributing to the achievement of sustainable</p>	<p>Noted.</p> <p>The reference to ‘strictly controlled’ refers specifically to adherence to Development Plan policies, as the policy clearly states. It is therefore appropriate.</p>	None



			<p>development, and in a way that is aspirational but deliverable. A blanket approach of ‘strict control’ does not reflect the need for balanced, evidence-led decision-making, particularly where land adjoins a Key Centre and is capable of sustainable integration.</p> <p>As previously mentioned, Broughton Astley is identified within the adopted Harborough Local Plan (2011 – 2030) as a Key Centre, where development adjoining the settlement boundary may be acceptable subject to compliance with strategic policies. In this context, the application site’s categorisation as countryside is a result of the proposed Limits to Development policy rather than its physical or functional relationship to the settlement. The reliance on Neighbourhood Plan Policy 1 within Policy 23 is also unclear, as Policy 1 relates specifically to residential site allocations rather than the broader management of countryside land, resulting in unnecessary confusion.</p> <p>The Site is located within the Upper Soar – Broughton Astley Rolling Farmland Landscape Character Area, which is consistently assessed as having moderate sensitivity to residential development. Importantly, the site is well contained by existing development, mature vegetation and physical features, and benefits from a landscape framework that limits wider visual effects.</p> <p>Accordingly, the application site does not represent an area of countryside where character or landscape value would be fundamentally harmed by development. Instead, the</p>		
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				evidence demonstrates that the site is capable of forming a logical, defensible and well integrated extension to Broughton Astley. Policy 23 should therefore be applied flexibly and in a manner consistent with the strategic policies of the development plan and the NPPF (2024).		
	Policy 26			<p>Biodiversity and Habitat Connectivity</p> <p>Policy 26 seeks to protect and enhance biodiversity and maintain habitat connectivity, including the safeguarding of identified wildlife corridors within the Neighbourhood Plan area.</p> <p>The Site at Dunton Road does not impact upon the identified wildlife corridor associated with the disused Midland Railway Line (as shown on Figure 10). Any development on the Site could be brought forward without severing habitat connectivity or causing harm to any designated or locally important ecological features. The Site is capable of delivering biodiversity enhancements in accordance with Policy 26, ensuring that the integrity and function of the wider ecological network are maintained.</p>	Noted. As the site is not a residential allocation in the NP, this comment is irrelevant.	None
	Policy 29			<p>Sites of Historical Environmental Significance</p> <p>Policy 29 seeks to ensure that development conserves and enhances the historic environment, including both designated and non-designated heritage assets and their settings. It also identifies a number of locally significant heritage sites in figure 12.</p>	Noted. As the site is not a residential allocation in the NP, this comment is irrelevant.	None



				<p>While the identification of locally significant heritage sites is acknowledged, it is important that the BANP does not attribute a level of protection that exceeds what is set out in national policy. The NPPF (2024) is clear that non-designated heritage assets are afforded a lower level of protection than designated heritage assets, and that any harm arising from development should be assessed in a proportionate manner, with the significance of the asset and the scale of harm weighed against the public benefits of the proposal.</p> <p>In this regard, there are no designated heritage assets within the Site or within its immediate surroundings, and that the proposed development would not result in harm to the significance or setting of nearby historic buildings.</p>	<p>The policy wording has regard for national policy.</p>	
	Policy 31			<p>Ridge and Furrow</p> <p>Policy 31 seeks to protect areas of ridge and furrow as a locally distinctive historic landscape feature.</p> <p>Evidence prepared to support the outline application demonstrates that the ridge and furrow within the Site is a low-quality and eroded, forming only a small and fragmented part of a much wider and better-preserved pattern found elsewhere in the parish. This confirms that ridge and furrow across Broughton Astley varies significantly in its condition and heritage value.</p>	<p>We consider the 'quality' of the few surviving instances to be difficult to measure. The policy is intended to identify and protect all surviving R&F in the Area.</p>	None



				<p>In this context, it would be helpful for Policy 31 to allow a more flexible and proportionate approach, recognising that not all ridge and furrow carries the same level of significance. Where site-specific evidence shows that the heritage contribution is limited, it is appropriate for this to be balanced alongside the wider social, environmental and economic benefits of development. Such flexibility ensures that the BANP continues to contribute to sustainable development, in keeping with the Basic Conditions, while still safeguarding high-value and well-preserved examples of ridge and furrow across the parish.</p>		
	General			<p>Site Benefits</p> <p>This section sets out the additional sustainable development benefits that the Site can deliver, demonstrating how its allocation could achieve positive outcomes for Broughton Astley. It aligns with paragraph 124 of the NPPF – Making Effective use of Land, which highlights that making effective use of land is fundamental to delivering sustainable development by directing new housing to suitable, sustainable locations with the necessary infrastructure in place.</p> <p>The Site is well placed to integrate sensitively within the existing settlement pattern of Broughton Astley and would contribute positively to its sustainability. It can deliver a policy compliant level of affordable housing, alongside a mix of market housing that reflects local needs, helping to address the shortfall in housing land supply across the</p>	<p>Noted. As the site is not a residential allocation in the NP, this comment is irrelevant.</p>	None



			<p>District. The development would support social cohesion by extending the community in a logical, well connected manner, integrating with the established character of the area, and reinforcing Broughton Astley’s role within the settlement hierarchy. High-quality design would provide a range of house types, sizes, and tenures, with a clear street hierarchy and a circular walking route around the proposed open space, enhancing accessibility and community interaction.</p> <p>The Site offers the potential to deliver significant environmental benefits alongside new housing. It provides opportunities for biodiversity net gain, the creation of publicly accessible open space, and the retention of existing vegetation and hedgerows, including the veteran crack willow at the centre of the Site as a key feature. The Sites location also promotes sustainable patterns of movement, with walking and cycling routes linking to Broughton Astley’s services and facilities from Blockley Road, reducing reliance on the private car and supporting climate change mitigation objectives.</p> <p>The Site will deliver a range of economic benefits, including job creation during construction, increased local expenditure in shops and services, and additional Council Tax revenue. It is well-located near significant employment opportunities, including Cottage Lane Industrial Estate, and Magna Park, which host a variety of businesses, including high-end manufacturing and distribution. The Site’s excellent connectivity, with access to the M1 corridor and</p>		
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			<p>wider regional links, further supports its economic potential meaning that the development will attract residents across a range of socio-economic backgrounds. 19 922993.56 Representations to the Broughton Astley – (Neighbourhood Plan Review) on behalf of Davidsons Developments.</p> <p>The development of the Site will provide much-needed housing while supporting the BANP objectives. Any additional pressure on schools, healthcare, or roads will be mitigated through consultation with relevant consultees and any appropriate and CIL complaint financial contributions would be provided as necessary and where viable, as would be the case with any site that comes forward for development. In doing so, the Site should be seen to deliver sustainable growth that aligns with social, environmental, and economic aspirations for Broughton Astley.</p>		
			<p>Conclusion</p> <p>This representation has been submitted on behalf of Davidsons Development in respect of Land east of Dunton Road, Broughton Astley, in response to the draft Broughton Astley Neighbourhood Plan Review (2021–2041). This representation has engaged constructively with the draft policies and supporting evidence, having regard to national planning policy, the Basic Conditions, and the emerging Harborough District Local Plan (2020–2041).</p>	<p>Noted. As the site is not a residential allocation in the NP, this comment is irrelevant.</p>	<p>None</p>



			<p>It has also sought to highlight the benefits that the Site east of Dunton Road could play in helping to deliver a comprehensive, landscape-led residential community. The site and has the capacity to contribute meaningfully to meeting future housing needs in a well-planned and integrated manner. Importantly, recognising the potential to allocate a portion of the wider site would enhance the resilience and flexibility of the Neighbourhood Plan at a time when strategic housing requirements are still evolving, ensuring that the BANP remains positively prepared, capable of responding to change, and aligned with the long-term growth needs of Broughton Astley.</p> <p>On part of the Site a outline planning application (reference 26/00018/OUT) has been submitted in January 2026 for up to 90 dwellings, with all matters reserved except access via Davidsons existing development at Blockley Road. The application is supported by a comprehensive suite of technical evidence, demonstrating that the Site is capable of coming forward within the Neighbourhood Plan period, this can be increased up to 125 dwellings with suitable access provision off Blockley Road.</p> <p>The draft BANP indicates a preference for the allocation of smaller, proportionate housing sites rather than reliance on the proposed larger strategic allocation at Land off Frolesworth Road (BA1 – 475 dwellings) identified in the emerging Harborough District Council Local Plan. In this context, the Site represents a logical and sustainable opportunity to support this direction of travel and should be</p>		
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			<p>considered for allocation alongside the currently proposed smaller site at Witham Villas and offers flexibility in its opportunities to provide a range of units to help meet the required needs of the BANP.</p> <p>The Site performs well against the relevant site assessment criteria and has been assessed positively within Harborough District Council's 2024 SHELAA, which represents the most up-to-date and relevant evidence base. However, the site assessment work underpinning the Neighbourhood Plan has not been updated since 2023 and does not reflect the additional technical information now available. 21 922993.56 Representations to the Broughton Astley – (Neighbourhood Plan Review) on behalf of Davidsons Developments</p> <p>The representation has also demonstrated that the Site raises no policy conflicts in relation to biodiversity, heritage, landscape or green infrastructure. In particular, development would not impact upon the disused Midland Railway Line, which is identified within the BANP for ecological and heritage value. However, several policies would benefit from greater flexibility to ensure they do not apply undue weight to non-designated assets or constrain sustainable development unnecessarily and align more closely with local and national policy aims.</p> <p>Overall, it is submitted that the Broughton Astley Neighbourhood Plan would be strengthened by allocating a portion of Land east of Dunton Road for up to 125 units.</p>		
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				Doing so would support the BANP objectives, provide flexibility in housing delivery, align with the Parish Council's preferred growth strategy, and ensure that it is positively prepared, justified and consistent with national policy and the Basic Conditions.		
24			Tim Evans Avison Young (Jelson Ltd)			
				<p>Conformity and Basic Conditions</p> <p>Although the local community can decided what to include in a Neighbourhood Plan (NP), it must nevertheless meet the 'Basic Conditions' set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. The BANP will have to meet these conditions if it is to proceed to a referendum and be made. Those basic conditions are:</p> <ol style="list-style-type: none"> 1. The NP must have regard to national policy and guidance from the Secretary of State 2. It must contribute to sustainable development 3. It must be in general conformity with the strategic policy of the development plan for the area (Harborough District) 4. It must not breach or be otherwise incompatible with EU obligations, including the Strategic Environmental Assessment Directive of 2001/42/EC 5. The making of the NP is not likely to have a significant effect of a European site (as defined in the Conservation of Habitats and Species 	Noted	None.



			<p>Regulations 2010(d), either alone or in combination with other plans or projects.</p> <p>We have concerns that as currently drafted, the BANP fails to satisfy the first three basic conditions.</p> <p>While a draft NP must be in conformity with the strategic policies of the development plan in force (i.e. the Harborough Local Plan (HLP) 2011-2031) if it is to meet the basic conditions. That Plan was adopted in 2019, its housing requirement is significantly lower than that for Harborough District, derived using the Standard Method, and its development strategy has failed to such an extent that the Council is no longer able to meet its identified development needs.</p> <p>With the above in mind Harborough District Council (HDC) has embarked on a review of its Local Plan. HDC consulted on the Proposed Submission Draft Harborough District Local Plan (HDLP) in May 2025. It is expecting to submit the Plan for examination in March this year with a view to having the new Local Plan adopted by the end of 2026.</p> <p>As the draft BANP acknowledges the District's overall housing requirement has increased significantly and in order to help it meet those needs, the emerging HDLP anticipates that the Large Villages will between them be able to accommodate 1,500 new homes over the plan period, including 475 homes in Broughton Astley.</p>	<p>The NP meets the housing requirement set by the LPA and has taken into account the latest evidence of housing need.</p>	<p>None</p>
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			<p>Yet the reasons the Neighbourhood Plan Group (NPG) has given for commencing a review of the BANP appear to relate to it attempting to address changes to national planning policy and primarily to help HDC address the issues arising from the commitment it has made to accommodate some of Leicester City’s unmet housing need within Harborough District. That seems wrong to us. It is remiss of the BANP to ignore the policies and development strategy of the emerging HDLP. Indeed, the Planning Practice Guidance (PPG) provides that Neighbourhood Plans (NPs) can be developed before or at the same time as the local planning authority is producing its local plan. There is, therefore, no reason why the draft BANP should ignore the District’s emerging development strategy. Especially when the NPG could find itself in a situation whereby the respective timetables for the making of the BANP and HDLP could mean that the BANP has to be examined against the provisions of a newly adopted HDLP or that if the BANP is adopted in advance of the adoption of the HDLP, that BANP becomes at odds with the spatial strategy and policies of the HDLP as soon as it adopted.</p> <p>Having clarity about the policy framework within which the BANP is important for a whole host of reason. For example.</p> <ul style="list-style-type: none"> • paragraph 30 of the NPPF makes clear that NPs should not promote less development than set out in the strategic policies for the area, or undermine those policies. • Footnote 17 to paragraph 30 provides that NPs must be in general conformity with the strategic policies contained in any development plan that covers the area. 	<p>The NP is not ignoring the emerging Local Plan – indeed it acknowledges the proposed LP allocation in the Neighbourhood Area and addresses the housing requirement by allocating its own site</p> <p>However, the NP will be examined against the adopted LP, not the emerging one.</p> <p>This is all noted and reflected in the NP Review.</p>	<p>None</p> <p>None</p>
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			<ul style="list-style-type: none">• the PPG highlights that the reasoning and evidence informing the emerging local plan process is likely to be a relevant to the consideration of the basic conditions against which a NP is tested. By way of an example, the PPG highlights that up to date housing need evidence is relevant to the question of whether a housing supply policy in a NP contributes to the achievement of sustainable development.• The PPG also makes clear that in scenarios such as this (i.e. where a NP is being brought forward before an up to date LP is in place), the qualifying body should discuss and aim to agree the relationship between policies in:<ul style="list-style-type: none">• the emerging NP• the emerging LP / spatial development strategy• the adopted development plan• the PPG requires that appropriate regard to national policy and guidance must also be had. <p>Moreover, the PPG makes clear that:</p> <p>“The local planning authority should work with the qualifying body so that complementary neighbourhood and local plan policies are produced. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies. This is because section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.”</p>		
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			<p>For these reasons we believe that the draft BANP fails to satisfy the basic conditions.</p> <p>Housing and the Built Environment</p> <p>With regard to housing development in the village, Section 4.1 of the draft BANP confirms that the adopted HLP 2019 did not propose to distribute any new housing development to Broughton Astley on the basis that the adopted BANP allocates ample land to meet the settlements needs over the Plan period.</p> <p>Section 4.2 of the draft BANP confirms that the adopted BANP made provision for the delivery of at least 400 new homes through the combination of the allocation of three sites (Jelson’s site at Broughton Way; William Davis’s site off Coventry Road; and, Davidson’s site north of Dunton Road) together with an additional site that already benefitted from planning permission (land off Crowfoot Way). In total those four sites have capacity to deliver 571 homes between them. Most were built out around 2018/19 save for Jelson’s, which was completed more recently.</p> <p>For these reasons, the Neighbourhood Plan Group argues that it “does not need to allocate any new ‘major housing sites” in the emerging BANP.</p> <p>Yet, the last few paragraphs of Section 4.1 of the draft BANP acknowledge that in regard to the emerging HDLP</p>	<p>The NP Review takes into account the most recent evidence of housing need, as identified in the Regulation 19 Local Plan.</p> <p>We agree that this reference is misleading and we will remove this reference.</p>	<p>None</p> <p>Change to be made as indicated.</p>
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			<ul style="list-style-type: none">• Broughton Astley is classified as a ‘Large Village’ (in other words a sustainable location for development in the District, because of the range of services, facilities and employment opportunities it offers);• there is a requirement to deliver 13,812 new dwellings over the plan period, of which, the Council expects some 475 new homes will be located in Broughton Astley• it is anticipated that Broughton Astley’s housing needs could be met though the allocation of a single housing site (land off Frolesworth Road), which is located within the Neighbourhood Area. <p>For some reason, these requirements don’t follow through into the BANPs residential allocations. Instead, the draft BANP seems to suggest that it housing requirement / allocation is underpinned by evidence contained in the AECOM Assessment of Local Housing Needs in Broughton Astley. As far as we are concerned this raises significant concerns. Firstly, the AECOM report was published in January 2023, it therefore pre-dates by over two years, the evidence base that HDC has prepared to inform its Local Plan review. The NPG has therefore failed to take account of new and more up to date evidence on local housing need that is available to it. Secondly, the AECOM report does not arrive at a view on how many new homes would need to be delivered in the village to meet its identified needs. Instead, it looks at the types, sizes and tenures of homes needed in Broughton Astley.</p>	<p>It was not the role of AECOM to identify how many new houses are needed – this figure was set by HDC.</p>	<p>None</p>
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			<p>We note also that the AECOM report makes a series of recommendations, which the NPG does not appear to have acted upon. For instance:</p> <ul style="list-style-type: none"> • it is recommended that the NPG discusses the contents and conclusions of its analysis with Officers of HDC with a view to agreeing and formulating the housing policies of its draft NP; Avison Young (UK) Limited registered in England and Wales number 6382509. Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS 3 • it advises the NPG that it should carefully monitor strategies and documents produced by the Government, HDC and other bodies, which could impact on the emerging Plan’s housing policies to ensure that they remain in general conformity with the strategic policies of the development plan; and, • recommends that the NPG should monitor ongoing demographic and other trends to help ensure that the emerging BANP policies remain relevant and credible. 	<p>The NP allocation was discussed at length with HDC. This is simply not correct.</p>	<p>None</p>
			<p>As discussed above, in order to be legally compliant the draft BANP will need to be brought forward in accordance with an up to date Local Plan. In this case the adopted HLP is out of date and does not make provision for any development in Broughton Astley. The BANP as currently drafted cannot therefore be in conformity with the adopted Development Plan and nor should it be.</p>	<p>There is no legal requirement for the NP to be ‘brought forward in accordance with an up to date Local Plan’.</p>	<p>None</p>
			<p>Neither is it in conformity with the development strategy set out in the emerging HDLP – the NP does not allocate</p>	<p>Sufficient land is allocated in</p>	<p>None</p>



			<p>sufficient land to meet Broughton Astley’s identified local housing need.</p> <p>Moreover, the evidence that the NPG is relying upon to justify the decisions it has taken in respect of the amount of housing required in the settlement is not fit for that purpose.</p> <p>The NPPF provides that strategic policies should set out a housing requirement figure for designated neighbourhood areas from their overall housing requirement (paragraph 69). The emerging HDLP does that. In circumstances where an emerging Local Plan is not yet adopted the NPPF encourages NPGs when preparing their NPs to consider providing indicative delivery timetables and allocating reserve sites to ensure that emerging evidence of housing need is addressed. In the Government’s view this can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new local plan.</p> <p>As it stands, the daft BANP fails to make appropriate provision to meet the identified housing needs of Broughton Astley and as a consequence, it risks failing to conform with or being overridden by the emerging HDLP once it becomes adopted.</p> <p>In Jelson’s view, in order for the emerging BANP to meet the basis conditions (1, 2 and 3) set out in paragraph 8(20 of Schedule 4B of the Town and Country Planning Act 1990, it</p>	<p>conjunction with the LP allocation.</p> <p>We disagree with this interpretation. The NP Review makes provision for additional housing in the Neighbourhood Area over and above the minimum housing requirement set by HDC.</p> <p>The narrative offered here is a misrepresentation of what is required.</p>	None
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			<p>should allocate additional sites in order that the BANP is capable of delivering at least 475 new homes over the Plan period – the minimum requirement set out in the emerging HDLP. The guidance on the production of NPs and the proposed changes to the NPPF make it clear that communities are free to plan for more (but not less) development than set out in strategic policy. There would therefore be nothing wrong with the NPG taking this approach.</p> <p>The provision of additional housing will provide flexibility and will help drive and deliver improvements to the infrastructure and facilities the village needs. There is no evidence at all that planning for this level of housing will generate any environmental concerns. This is supported by the SEA prepared in support of the Draft Submission HDLP.</p> <p>Additionally, this would help the NPG satisfy its other housing objectives, including the delivery of affordable housing targets, specialist housing for older people and housing for people with disabilities. This aligns fully with the thrust of the emerging policy position in Harborough District as well as with national planning policy.</p> <p>Insofar as the proposed changes to the NPPF are concerned, the NPG should note that it is the Government’s intention to reword policy to (a) reflect the approach to the new ‘presumption’; and, (b) to make clear that to qualify the NP should contain allocations to meet the identified</p>		
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			<p>housing requirement. The BANP as currently drafted fails to do that.</p> <p>As we will go on to discuss, these deficiencies could very easily be remedied by allocating Jelson’s site at Cottage Lane for development.</p> <p>Site Ranking and Prioritisation</p> <p>The PPG makes clear that when a neighbourhood planning body intends to allocate sites for development it will need to carry out an appraisal of options and an assessment individual sites against clearly defined criteria. As a starting point the PPG encourages neighbourhood planning bodies to use the guidance on general principles for assessing sites and on viability as a framework for the assessment of sites¹. In particular, the Government says that neighbourhood planning bodies may use the method set out in its guidance on preparing housing land and economic land availability assessments to assess the potential of housing sites but makes clear that any assessment undertaken needs to be proportionate to the nature of plan. It also provides that neighbourhood planning bodies may also make use of existing site assessments prepared by the local planning authority as a starting point when identifying sites to allocate within a neighbourhood plan.</p> <p>The PPG also directs neighbourhood planning bodies to use the neighbourhood planning toolkit on site assessments in scenarios where they are intending to allocate sites for development in a NP. The Toolkit explains the principles for</p>	<p>There are no deficiencies and the promotion of the site is noted but is not required to meet the basic conditions.</p>	<p>None</p>
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			<p>allocating sites and the methods that should be applied to make sure the sites that are chosen are the most appropriate for the neighbourhood. Importantly, it contains a site assessment template that can be used by neighbourhood plan groups to assess sites for possible inclusion in a neighbourhood plan and provides guidance on site allocations, to explain how to use the results of the site assessment process to develop site allocation policies in the neighbourhood plan. The Toolkit explains that carrying out a site assessment will provide the evidence that the sites selected for allocation are the most appropriate – that they are in the most sustainable location, they are in general conformity with the strategic policies of the Local Planning Authority’s Local Plan and that there is a good prospect that they will be developed.</p> <p>Insofar as the site selection process is concerned the Toolkit recommends that NPGs begin by undertaking a site identification process. This can for example, include a ‘call for sites’, interrogation of the Local Plan evidence base (SHLAA/SHELAA etc), live planning applications and sites known to the community. We would welcome confirmation from the Council about how it has carried out its site identification process. The toolkit then directs NPGs to carry out a site assessment process, which comprises two stages (i) an initial sift – where they should exclude any sites with insurmountable constraints (national environmental designations, sites located within Flood Zone and isolate sites in the countryside; and (ii) an assessment of sites to establish which are suitable and available for development</p>	<p>The site selection process was undertaken by Locality’s technical support partners in line with best practice guidance.</p>	<p>None</p>
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			<p>and of their capacity. This should then lead into a site selection stage, whereby NPGs confirm which of the suitable and available sites best meet the identified development need (i.e. its housing requirement), the Draft Neighbourhood Plan objectives and policies; and, are not subject to any abnormal costs which could affect viability. At this point, NPGS should also discuss the sites with the LPA and consult with the community.</p> <p>Our understanding is that the NPG commissioned AECOM to undertake a Site Options Assessment, the findings of which were published in July 2023. This forms Appendix B to the material that the NPG is currently consulting on. According to the AECOM report this analysis was undertaken to enable the NPG to identify sites which could potentially be allocated for housing in the draft BANP to meet a locally identified housing need (the proportion of Leicester City's unmet housing need that HDC has agreed to take), whilst AECOM acknowledge that at the time that they prepared their report that there was no explicit requirement for any housing in the neighbourhood area. As discussed above, that position has now changed – there is an identified local housing need in Broughton Astley and as a matter of principle the approach that AECOM has taken to site selection and its recommendations is fundamentally flawed, in our view.</p> <p>We also have a number of concerns about the way in which AECOM has assessed the sites that were put forward for consideration, the conclusions that they reached and then the process that the NPG went through to arrive as its</p>		
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			<p>preferred site for allocation in the draft BANP. These are discussed in detail in the following section.</p> <p>AECOM Site Selection Analysis</p> <p>AECOM assessed a total of 19 sites in its Site Selection Assessment Report. They comprised 16 sites that were submitted for consideration through HDCs SHELAA in 2021 and the remainder which were put forward for consideration through the BANP call for sites exercise. The three sites submitted to the NPG as part of its call for sites exercise were assessed using what appears to be a NP Toolkit compliant proforma, whereas the sites that were submitted to HDC through its SHELAA were assessed by HDC, with AECOM reviewing the conclusions HDC reached to determine whether they are applicable to the criteria that it used for the BANP site assessments.</p> <p>The issue with this (a) the information that AECOM assessed is approaching 5 years old; (b) it has not been updated to take account of the SHELAA update that HDC published in 2024; and (c) crucially, the SHELAA assessment criteria is far less detailed than the criteria AECOM applied when assessing sites using its own NP proforma – the SHELAA is a high level assessment of whether a site is suitable, available and achievable and could potentially be carried forward for allocation in the HDLP, whereas the AECOM have assessed the sites against a whole range of environmental, heritage and other criteria.</p>	<p>The Qualifying Body has chosen to rely on the site assessments undertaken by specialists in the field and formally signed off by Locality.</p>	<p>None</p>
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			<p>We have the following concerns about this process:</p> <ul style="list-style-type: none">• the various sites don't appear to have been assessed evenly against the same set of criteria;• the conclusions reached in respect of Jelson's site being potentially unsuitable for allocation due to access issues are flawed because the site can be accessed via the housing estate that Jelson has built immediately to the west of it. <p>NPG Site Selection Process</p> <p>In August 2025 the NPG wrote to local residents to advise them that HDC has allocated 475 new homes to Broughton Astley in its emerging HDLP and anticipate that this requirement would be met through the allocation of a single site on land off Frolesworth Road, but that the NPG had identified seven suitable sites within the village, that would potentially be suitable locations to meet the identified need. Local residents were presented with two options to consider. First, that the NPG proceed with HDCs proposal to allocate the land off Frolesworth Road for 475 homes; or, second distribute the housing requirement across a combination of smaller sites locally.</p> <p>Consultation on the 7 sites ran between 26 August and 24 September 2025. Local residents were asked to identify their four preferred options.</p>	<p>The process undertaken was transparent and supported through community engagement.</p>	<p>None</p>
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			<p>The NPG advised Avison Young in correspondence that it then examined the 7 sites in greater detail taking into account things such as:</p> <ul style="list-style-type: none">- a comparative analysis of strengths and constraints- a review of consultation feedback and community preferences- giving consideration of cumulative impacts and scale- assessing how the sites align with emerging Local Plan requirements <p>The NPG has been unable to provide AY with any information relating to the criteria it applied when assessing the sites and how each site performed against them or how each site scored. We would typically expect the NPG to publish the scoring matrix that it has used to assess each site. It has not done this so the process is flawed. For example, there is nothing to demonstrate:</p> <ul style="list-style-type: none">• how each site has been identified• whether a site is affected by any statutory environmental designations• whether a site is affected by any non-statutory environmental designations• whether the correct distances have been used to assess the distances between a site and community services and facilities• that the sensitivity of the landscape has been assessed in the correct terms• any regard has been paid to the sensitivity of a site in visual amenity terms• that there are any existing local plan designation to other relevant policies relating to a site		
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			<ul style="list-style-type: none">• that the correct criteria for assessing the relationship of a site to the existing settlement has been applied.• Whether there are any know legal or ownership problems that would impact on a site’s development potential.• The justification for how a site has been rated / scored. <p>Instead, we were advised that it took forward 4 sites for further consideration based upon how they performed in terms of flood risk, limited traffic impact, good access to services, lower environmental impacts and strong deliverability. The sites given further consideration were:</p> <ul style="list-style-type: none">• Site 2 – land at Cottage Lane (Jelson’s site)• Site 5 – Witham Villa• Site 4 – East of Dunton Road• Site 1 – Broughton Chase (Crowfoot Way) <p>From our correspondence with the NPG we understand that while several sites were considered potentially suitable for allocation, the Witham Villa site was selected as the preferred option and as the site to be taken forward for allocation in the draft BANP for the following reasons:</p> <ul style="list-style-type: none">- it is a medium-sized site capable of delivering housing without placing excessive pressure on infrastructure.- it is adjacent to existing residential development and close to key facilities, including Aldi, the sports centre and the proposed medical centre.- no flood risk issues were identified, and landscape sensitivity was assessed as low.		
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			<p>- traffic impacts were considered limited, with good access opportunities.</p> <p>- the site performed strongly in deliverability terms and was capable of coming forward in the plan period.</p> <p>Yet again, there is absolutely no evidence that the NPG has undertaken a comparative assessment of the merits of each site or how it has arrived as its decision to take forward Witham Villa as its preferred site. Indeed, based on the limited information available, Jelson is of the view that reasons that the NPG has given for allocating the Witham Villa site apply equally, if not more so, to its site at Cottage Lane. For instance, it is certainly better connected to Aldi and facilities in the village and performs better than the preferred housing site. The same would apply in deliverability terms given it is controlled by a housebuilder who is in the process of completing the development immediately adjacent to the site. As a consequence, Jelson fails to understand the logic underpinning the NPGs decision to allocate Witham Villas for development in the draft BANP.</p> <p>Moreover, it unclear to Jelson why the NPG has not sought to allocate additional sites in the draft BANP to help it meet its identified local housing need / requirements. To date, the only justification that the NPG has provided for failing to allocate additional sites for housing in the draft BANP is that it would trigger the need for SEA re-screening which would potentially introduce delay and risk the draft BANP from progressing. That may well be the case but is not a</p>	<p>The primary assessment was undertaken by AECOM, and from this assessment the Qualifying Body selected the preferred site</p>	<p>None</p>
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			<p>valid reason for failing to properly plan to meet the village's identified needs.</p> <p>With all of the above in mind, the NPGs site selection process cannot be considered robust. Carrying out a proper site assessment will provide the Parish Council with the evidence that the sites it intends to select for allocation are the most appropriate – in other words, that they are in the most sustainable location, they are in general conformity with the strategic policies of HDCs emerging Local Plan and importantly, that there is a good prospect that they will be developed.</p> <p>Cottage Lane, Broughton Astley</p> <p>Jelson would like to take this opportunity to remind the NPG of the various metrist of its site to the north of Cottage Lane Broughton Astley. Its land holdings extend to just over 12 hectares. The site sits adjacent to recent and ongoing housing and employment developments that have taken place to the west (by Jelson) and established employment areas to the south.</p> <p>Jelson owns the whole site, including land required for access. The site is clearly available for development now, thereby fulfilling this part of the NPPF deliverability test.</p> <p>It could provide in the order of 250 dwellings, together with land for community uses. This scale of development could easily be accommodated within the village and has the</p>	<p>based on local factors, and endorsed through community consultation.</p> <p>The QB is not looking to allocate an additional or alternative site in the NP.</p>	
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			<p>potential to support improvements to infrastructure in the village, as was the case with the previous Jelson development.</p> <p>The site is particularly well positioned as it could be developed without extending the village beyond its current northern and eastern extremes, i.e. the new built form would not go any further north or east than the existing settlement edges.</p> <p>As the NPG is aware, Jelson has a longstanding reputation as one of the region's leading house builders. Jelson's work in the past includes numerous projects in Harborough District including housing development in Broughton Astley, adjacent to this site. Jelson knows the housing market in Broughton Astley well and is confident that there is demand for the type of homes that they build.</p> <p>Taking all of this into account, we conclude that development of the site is not only highly sustainable but also fits squarely with HDCs emerging spatial development strategy and its allocation would help the NPG to satisfy its local housing needs. In addition, it is deliverable immediately as part of Jelson ongoing development on adjacent land.</p> <p>In summary, we remain firmly of the view that Jelson's site has no significant constraints which would prevent the delivery of housing and it would make for a logical extension to the village. We believe that the site could make</p>	Noted	None
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				a very valuable contribution to the housing need for Broughton Astley. As such, we would therefore politely request that the NPG consider the points made in these representations, with a view to considering allocating Jelson's site for development in order to address the current failings of the draft BANP to accord with the basic conditions.		
25			Lanica Agnew Stantec (IM Land)			
	General			<p>Basic Conditions</p> <p>The draft Broughton Astley Parish Council Neighbourhood Plan will need to demonstrate that it has met the 'Basic Conditions' as set out in Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (alongside procedural compliance matters). The test for whether a Neighbourhood Development Plan can proceed to referendum is whether it meets the six 'basic conditions'. These are:</p> <p>(a) having regard to national policies and advice contained in guidance issued by the Secretary of State;</p> <p>(b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses;</p>	Noted	None



			<p>(c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area;</p> <p>(d) the making of the order contributes to the achievement of sustainable development;</p> <p>(e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);</p> <p>(f) the making of the order does not breach, and is otherwise compatible with, obligations; and</p> <p>(g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.</p> <p>Our representations identify a number of parts of the draft BANPR which do not meet the Basic Conditions, as presently drafted. These sections will need to be deleted or amended prior to submission.</p>		
			<p>The Development Plan</p> <p>The Harborough District Council Local Plan (2011- 2031) was adopted in April 2019. Policy SS1 – The Spatial Strategy recognises Broughton Astley as a Key Centre within the Harborough District Settlement Hierarchy and development should be directed to the most sustainable locations within the Borough.</p> <p>The Local Plan is considered to be out of date. Harborough District Council are progressing a New Local Plan and are</p>	Noted	None



				<p>now at an advanced stage with such. The Regulation 10A review was triggered in April 2024, five years after adoption and Harborough District Council undertook their regulation 18 (Issues and Options) consultation in February 2024. The Plan reached Regulation 19 stage with consultation between March 2025 until May 2025 and is proposed to be submitted for independent examination in March 2026 before adoption anticipated in early 2027 in accordance with the LDS (November 2025).</p>		
				<p>National Planning Policy Framework and Planning Practice Guidance</p> <p>The most recent version of the NPPF was published in December 2024, replacing the December 2023 version. A further update was published in February 2025 to correct paragraph numbers. A draft NPPF for consultation was released in December 2025 and is expected to lead to an updated NPPF being published in mid 2026.</p> <p>Paragraph 239 of the NPPF 2024 states: “For neighbourhood plans, the policies in this Framework will apply for the purpose of preparing neighbourhood plans from 12 March 2025 unless a neighbourhood plan proposal has been submitted to the local planning authority under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) on or before the 12 March 2025”.</p>	<p>Noted.</p> <p>The NP Review is based on the 2024 NPPF</p>	<p>None</p>



			<p>The draft BANPR and supporting evidence base has been prepared under the December 2023 NPPF. As the BANPR had not reached Regulation 15 stage by 12 March 2025, it fails to adhere to paragraph 239 of the NPPF and fundamentally does not comply with Basic Condition (a). Amendments are therefore required throughout the BANPR to bring it in line with the current and correct NPPF. Paragraph 1.3 of the BANPR recognises that the Neighbourhood Plan must have regard to the National Planning Policy Framework, updated in December 2024 and the development plan for the area. In paragraph 1.3. the BANPR acknowledges that Broughton Astley is identified as a Key Centre, however states that “Broughton Astley is not expected to accommodate major new housing or employment development.”.</p> <p>Whilst the emerging Harborough District Local Plan has reached regulation 19 stage and does not yet form part of the Development Plan, some weight should be given to this emerging local plan which identifies Land off Frolesworth Road as a draft site allocation for major residential development.</p> <p>Paragraph 11(d) states “Plans and decisions should apply a presumption in favour of sustainable development where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless: (i) the application of policies in the Framework that protect areas or assets of particular importance</p>	<p>Noted. The latest evidence of housing need has been taken into account in the preparation of the NP Review.</p>	<p>None</p>
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			<p>provides a strong reason for refusing the development proposed; or (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well designed places and providing affordable homes, individually or in combination.”</p> <p>Paragraph 12 states “The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.”</p> <p>Paragraph 13 of the NPPF states “The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.”</p>		
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			<p>Paragraph 14 states “ In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply:</p> <p>a.) The neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and</p> <p>b.) The neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs 69-70).”</p> <p>Paragraph 13 recognises and explicitly states that “Neighbourhood plans should support the delivery of strategic policies contained in local plans,” and presently, the draft BANPR NP does not support the delivery of the emerging strategic policies within the emerging regulation 19 Harborough Local Plan.</p> <p>Paragraph 69 of the NPPF states: “Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or</p>		
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			<p>infrastructure investment. Within this overall requirement, strategic policies should also 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. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.”</p> <p>Paragraph 70 of the NPPF states: “Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.”</p> <p>With regard to paragraphs 14, 69 and 70 of the NPPF, Harborough’s emerging Local Plan identifies Broughton Astley’s identified housing requirement to be 475 dwellings during the proposed plan period which is 2020 to 2041. As we will expand upon in the following section of this representation, draft Policy 1 (Residential Site Allocation) of the draft BANPR, proposes to allocate 138 dwellings at the Witham Villa Site. 138 dwellings is only 29% of the housing requirement identified for the Tier 3, large village of</p>	<p>This statement is simply incorrect.</p> <p>The emerging Local Plan allocates a site to meet the minimum housing requirement in the Neighbourhood</p>	<p>None</p>
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				Broughton Astley, in accordance with the emerging new local plan Growth Policy DS01.	Area, so any NP allocation is above this	
				<p>Vision and Development Objectives</p> <p>Neighbourhood Plan Delivery and Monitoring Group recognise that many of the aspirations within current Broughton Astley Neighbourhood Plan 2013 – 2028 (adopted January 2014) have already been achieved and the draft Neighbourhood Plan’s intention is to “consolidate the proposals of the first Neighbourhood Plan and provide greater environmental protection for local people.”. Whilst it is encouraging to note that some of the previous Neighbourhood Plan proposed visions were achieved, it is important for the Parish Council to acknowledge that a significant amount of time has passed since its adoption, as well as a change in Government and updated and further changing National Policy. As such, we comment that the emerging Neighbourhood Plan needs to be prepared in accordance with up to date national and local planning policy guidance, and it should strengthen its position in support of local growth in the area and this is expanded upon in the following subheading.</p> <p>The proposed vision aims for Broughton Astley Parish Council’s Neighbourhood Plan for 2041 are as follows.</p> <ul style="list-style-type: none"> • New housing meets local needs • The character and appearance of the countryside and its natural environment are safeguarded 	<p>Noted.</p> <p>The NP Review satisfactorily addresses each of the issues raised and no evidence to the contrary is identified here.</p>	None



			<ul style="list-style-type: none">• Improved local employment opportunities• Local services and facilities are protected and improved• Important green spaces are protected• Local heritage is conserved• The impact of traffic on village life has been minimised. <p>We are supportive of Broughton Astley Parish Council’s Draft Neighbourhood Plan Vision, with a particular focus on ensuring that new housing meets local needs, which should be the housing requirement for Broughton Astley as set out in the emerging Local Plan.</p> <p>The PPG1 states that “A draft neighbourhood plan or Order must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic condition. Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development.</p> <p>Where a neighbourhood plan is brought forward before an up-to-date local plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:</p>		
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			<ul style="list-style-type: none">• the emerging neighbourhood plan• the emerging local plan (or spatial development strategy)• the adopted development plan with appropriate regard to national policy and guidance. <p>The local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body particularly sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination.</p> <p>The local planning authority should work with the qualifying body so that complementary neighbourhood and local plan policies are produced. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies. This is because section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.”</p> <p>Strategic policies should set out a housing requirement figure for designated neighbourhood areas from their overall housing requirement (paragraph 65 of the revised National Planning Policy Framework). Where this is not possible the local planning authority should provide an</p>		
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			<p>indicative figure, if requested to do so by the neighbourhood planning body, which will need to be tested at the neighbourhood plan examination. Neighbourhood plans should consider providing indicative delivery timetables and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new local plan.</p> <p>In this regard, the Regulation 19 Local Plan is underpinned by the Strategic Housing and Economic Land Availability Assessment (2024). Draft Policy SA01 proposes the allocation of 1,500 homes on Site Allocations in Large Villages, including 475 homes in Broughton Astley within the Plan Period (657 dpa between 2020 and 2036 and 534 dpa between 2036 and 2041).</p> <p>The Local Plan Review is due to be submitted to the Secretary of State in March 2026 and, subject to being found sound and legally compliant, anticipated to be adopted in early 2027. Given the advanced stage of the Local Plan Review, the timescales for the respective plans progressing to examination and adoption, and the identified conflict between the Local Plan Review and the NPR, there are clear practical considerations which we consider render the NPR to fail the basic conditions.</p> <p>The Neighbourhood Plan should therefore be amended to ensure that it complies with Basic Conditions (a) and (e).</p>		
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				<p>Broughton Astley Housing Requirement Figure</p> <p>As acknowledged in the draft BANPR, the emerging Local Plan identifies housing requirement for Harborough District as 13,182 up to 2041. The annual housing requirement is 657 homes per year (771 since 24th March 2025 which takes into account updated affordability ratios by the ONS) up to 2036 and 534 homes per year between 2036 and 2041. Importantly, Policy DS01 in the emerging Local Plan identified a net housing requirement for Broughton Astley of 475 homes, and Policy SA01 allocates site BA1 – Land off Frolesworth Road for 475 dwellings within the large village of Broughton Astley.</p> <p>Therefore, to accord with the PPG (Paragraph: 009 Reference ID: 41-009-20190509), the NPR should allocate sufficient land to (at least) meet the housing requirement figure contained in the emerging Local Plan. The Neighbourhood Plan should be amended to ensure compliance with Basic Condition (e).</p>	<p>This is simply wrong.</p> <p>The NP Review exceeds its minimum housing requirement with its allocation in conjunction with the Local Plan allocation, but there is no legal requirement for NPs to meet the identified housing requirement – so there is no conflict with the Basic Conditions.</p>	None.
		Policy 1	Residential Site Allocation	<p>Draft Policy 1 proposes to allocate land at Witham Villas for 138 dwellings. The allocation states that “the allocation through the Neighbourhood Plan of an additional site to that allocated through the Local Plan will help ensure that as the housing requirements for the Neighbourhood Area changes over the Plan Period, sufficient provision</p>	<p>It will ... in conjunction with the Local Plan allocation.</p>	None



			<p>is made locally to meet a local housing need in a locally appropriate location.” The allocation of the Witham Villas site will not meet the housing need figure for Broughton Astley.</p> <p>Land off Frolesworth Road</p> <p>The Land off Frolesworth Road is identified as a draft allocation within the emerging Regulation 19 Harborough Local Plan (2020-2041) and is allocated to meet Broughton Astley’s identified housing need of 475 dwellings. The emerging Local Plan has reached regulation 19 stage and is soon to be submitted for independent examination.</p> <p>Land off Frolesworth Road is a robust and comprehensive site which can provide significant improvements and provision of community infrastructure such as the expansion of the existing Orchard Church of England Primary School that is adjacent to the Site. In addition, the development of Land off Frolesworth Road proposes the expansion of Frolesworth Road Cemetery with parking provision, the expansion of Frolesworth Road Recreation Ground and the provision of a community facility in the heart of the site.</p> <p>Community Allotments and three children’s play areas are also proposed, in addition to providing a surplus of public open space across the site, with green infrastructure in the form of native planting and walkways. Sustainable Drainage systems in the form of swales and attenuation basins will</p>	<p>Noted. The site is not a preferred option for the NP Review</p>	<p>None</p>
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				<p>effectively control surface water on Site and speed reduction measures along the Frolesworth Road, on approach to Broughton Astley are proposed.</p> <p>These infrastructure benefits and mitigation measures demonstrate the suitability of the Site at the Land off Frolesworth Road. These benefits cannot be secured on the Witham Villas site.</p>		
		Policy 2		<p>Limits to Development</p> <p>Draft Policy 2 is a new policy introduced to establish the development boundary for Broughton Astley. The policy states that “Development proposals will be supported, in principle, on sites within the Limits to Development as shown in figure 3 (Appendix 2) ... Land outside the Limits to Development is treated as open countryside, where development will be carefully managed in line with the provisions of this neighbourhood Plan, the strategic policies of the Local Plan and national policies.”</p> <p>We acknowledge that the introduction of this policy is intended to restrict additional development on land outside the settlement boundary and recognise that the Parish Council have drawn the limit to development boundary tightly against the existing development boundaries within the village. We are supportive of the mention that development will be “carefully managed in line within the provisions of... the strategic policies of the Local Plan and national policies.”. As mentioned previously, Land off</p>	<p>Noted.</p> <p>We will amend the policy wording to acknowledge the Local Plan allocation at Frolesworth Road.</p>	<p>Change to be made as indicated.</p>



			<p>Frolesworth Road (Draft Strategic Allocation BA1) in the emerging Harborough District Local Plan is outside of the limits to development and we reinforce the understanding that Broughton Astley will not be able to meet its housing need within the confines of the draft Limits to Development (Appendix 2), demonstrating that the NPR conflicts with the emerging Local Plan.</p> <p>475 dwellings are required to meet local needs within Broughton Astley, and we argue that this figure cannot be met within the confines of the Limits to Development plan. The Neighbourhood Plan as currently drafted is not considered to meet the basic condition a.) in that it does not accord with paragraph 13 of the NPPF or the PPG.</p> <p>Constructively, consistent with the strategy for Broughton Astley in the emerging Local Plan, Broughton Astley’s housing requirement could be positively met through the delivery of a comprehensive proposal at the Land off Frolesworth Road Site and the site should be included within any Limits to Development boundary to be included in the NPR.</p>		
		Policy 4	<p>Housing Mix</p> <p>Draft Policy 4 reflects the findings from the Housing Needs Assessment</p> <p>“New housing development shall provide for a mix of housing types that will be informed by the most up to</p>	Noted	None



			<p>date evidence of housing need as evidenced by the Housing Needs Assessment 2023, or more recent document. Applicants for development of 10 or more dwellings will need to demonstrate how their proposals will meet the housing needs of older households (especially bungalows) and the need for smaller, low-cost homes.”</p> <p>We are supportive of draft Policy 4 and consider that housing developments should be reflective of Broughton Astley’s required housing types.</p> <p>We agree that new housing development should provide a mix of housing types informed by the most recent Harborough District Council’s Housing Needs Assessment (2023) and demonstrate how proposed housing mix will meet a range of housing needs inclusive of smaller homes for single person households.</p>		
		Policy 5	<p>Affordable Housing</p> <p>Policy 5 states “Development proposals for new housing where there is a net gain of more than ten dwellings, or on sites of more than 1,000 square metres, should provide at least 40% affordable housing.</p> <p>The provision of affordable housing for people with a local connection to Broughton Astley Parish (i.e. including living, working or with close family ties in the Parish) is supported.</p>	Agreed. The policy will be amended accordingly.	Change to be made as indicated.



			<p>The affordable housing stock should be made available as an integral part of the development, should be visually indistinguishable from the equivalent market housing on the site and should be dispersed throughout the development.</p> <p>Where delivered, affordable housing should be provided on the basis of 60% rent and 40% home ownership, and where first homes are included, this should be at a level of 40 50% to make them affordable to two lower quartile earners subject to viability. Shared ownership where available should include a 10-25% share to make it affordable for the same group of people.”</p> <p>Whilst we acknowledge the intent of draft Policy 5 and recognise the importance of delivering affordable housing in Broughton Astley, especially for people with a local connection to Broughton Astley. We note emerging Policy HN01 Housing Need: Affordable Homes in Harborough’s Regulation 19 Local Plan and consider that draft Policy 5 conflicts with this emerging policy.</p> <p>There is a difference in the tenure split between emerging policies as Policy HN01 sets out a tenure split for affordable housing to be as follow:</p> <ul style="list-style-type: none">• About 75% affordable or socially rented; and• About 25% affordable home ownership.		
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				Whereas the draft NPR states that “affordable housing should be provided on the basis of 60% rent and 40% homeownership,”. If the NPR intends to include a specific policy on Affordable Housing in order to meet Basic Condition (e) it should be in general conformity with Policy HN01. We would therefore recommend that Draft Policy 5 is amended to reflect the wording of Harborough District Council’s Draft Local Plan Policy HN01.		
		Policy 13		<p>Traffic Management</p> <p>The draft BANPR highlights localised traffic and parking issues that need to be addressed when considering development proposed. The NP also promotes sustainable transport with plans to improve cycling and walking. Policy 13 states:</p> <p>“New housing or commercial development should demonstrate that:</p> <p>a.) The cumulative impact on traffic flows on the strategic and local highway network, including the roads within and leading to the village centre, would not be severe, unless appropriate mitigation measures are undertaken where feasible;</p> <p>b.) Provision is made for accessible and efficient public transport routes within the development site or the improvement of public transport facilities to serve the development;</p>	Noted	None



			<p>c.) Improvements to pedestrian and cycle routes are incorporated to serve the development, where appropriate, and to provide safe, convenient and attractive routes to shops, employment, schools and community facilities and which are integrated into wider networks;</p> <p>d.) It retains existing rights of way or provides acceptable diversions;</p> <p>e.) It incorporates adequate parking and manoeuvring space within the development in accordance with the Highway Authority's standards; and: f.) Travel packs are to be provided on residential developments to encourage sustainable forms of transport and to promote existing pedestrian and cycle routes.</p> <p>Measures to improve pedestrian safety and reduce traffic speed within the village will be supported, including support for the design of large developments as 20 mph zones.</p> <p>IM Land are supportive of draft Policy 13 but wish to make the observation that the policy is a repetition of policy IN2 Sustainable transport within the adopted Harborough Local Plan (2019). We confirm that any forthcoming planning application for the Land off Frolesworth Road would be supported by a Transport Assessment and Travel Plan. We reinforce the significant benefits of the development of Land off Frolesworth Road, as not only would development of the Site adhere to this traffic management policy, but also speeds would be reduced along Frolesworth Road into the Village Centre through new gateway features on entry to</p>		
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			<p>the village, and the proposed access arrangement inclusive of a new roundabout would naturally slow vehicles down on entry to the village.</p> <p>Wider improvements associated with Land off Frolesworth Road include enhanced accessibility to bus routes and encouragement of active travel through the development and to the surrounding area.</p> <p>Land of Frolesworth Road further reduces car dependency through the proposed provision of on-site infrastructure including the expansion to Orchard C of E School, expansion and access to Frolesworth Road Recreation Ground, Frolesworth Road Cemetery, a potential Community Facility and new play areas set within an extensive public open space network. Public Rights of Way W60/2 and W48/4 within the Site are to be retained and improved for public use and travel packs would be conditioned to any forthcoming planning approval.</p> <p>Overall, we support draft Policy 13 of the draft BANPR.</p>		
		Policy 16	<p>Schools expansion</p> <p>The draft BANPR recognises that the wide range of educational provision is a key asset to Broughton Astley. It is also acknowledged that by 2027, the three Primary Schools in the village, notably Orchard (C of E), Hallbrook and Old Mill will be at full capacity by 2027.</p>	Noted	None



			<p>Draft Policy 16 states that: “ Proposals for the expansion of educational facilities in the Parish will be supported where it can be demonstrated that:</p> <p>a.) Expansion would not exacerbate access related or traffic circulation problems, unless suitable mitigation measures are brought forward as part of the proposal;</p> <p>b.) The development would not result in a significant loss of amenity to local residents or other adjacent users and is in character, scale and form to the current building;</p> <p>c.) ‘Safe Routes to Schools’ schemes and similar initiatives are introduced wherever possible utilising developer contributions where appropriate.</p> <p>The provision of onsite parking for staff and appropriate parking / drop off / pick up points for parents and children will be supported.</p> <p>We are supportive of Policy 16 and recognise the Neighbourhood Plan’s aspiration to address known primary education capacity constraints.</p> <p>Land off Frolesworth Road is located directly adjacent to Orchard Church of England Primary School which Policy 16 identifies will be at full capacity by 2027. It is therefore uniquely located to deliver land in addition to Section 106 education contributions to assist with the comprehensive expansion of the school both in response to existing demand for places and that generated by the site. As well as this, it is envisioned that future residents would be able</p>		
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			<p>to access the Primary School sustainably by foot, reducing the reliance on private vehicles.</p> <p>Were the NPDMG to be supportive of the Land off Frolesworth Road draft allocation, the draft BANPR aspirations can be achieved in a comprehensive, convenient and community driven way.</p> <p>IM Land are in discussions with Leicestershire County Council and Orchard Church of England Primary School on the potential to expand the school and request that the draft BANPR recognises the excellent opportunity for expansion of educational facilities in the Parish. The Witham Villas site is unable to deliver the same significant benefits to primary education.</p>		
		Policy 18	<p>Community Hub</p> <p>Draft Policy 18 acknowledges that The Orchard Medical Practice has almost 12,000 registered patients and in response to Broughton Astley’s growing population, developer contributions towards the provision of a medical centre have been secured. Draft Policy 18 advocates for the provision of a facility which provides additional services to reduce the need to make additional journeys out of the village and states:</p> <p>“The provision of a facility which provides additional services such as minor surgery, phlebotomy and physiotherapy and midwifery services to reduce the</p>	Noted	None



			<p>need to make additional journeys out of the village will be supported providing that the development will not result in unacceptable traffic movements, noise, fumes, smell or other disturbance to residential properties, or generate a need for parking that cannot be adequately catered for.</p> <p>Funding for the new facility will be sought through developer contributions and other sources, to ensure that medical facilities remain near to the centre of the existing village, being convenient and accessible enough to meet the needs of local people.”</p> <p>We support the inclusion of Draft Policy 18 and consider it meets the basic conditions. As noted on the emerging proposals for Land off Frolesworth Road, the opportunity exists to provide a new community facility within the site. Through our community consultation events we sought an understanding on the sort of uses the community would like to see delivered within the new facility and as part of that IM Land is in discussions with the Orchard Medical Practice and the Integrated Care Board (ICB) to understand whether such uses could include a new primary healthcare space.</p> <p>We uphold the view that the Land of Frolesworth Road draft allocated site provides a unique and ideal location for the delivery of a new community facility in close proximity to the village centre and other well established community assets, supporting the NPDMG aspirations for the Neighbourhood Area.</p>		
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		Policy 19		<p>Infrastructure</p> <p>Draft Policy 19 provides an updated list of priorities, stating: “New development will be supported by the provision of new or improved infrastructure, together with financial contributions for the following off-site infrastructure requirements where appropriate:</p> <p>a) Sport and recreation facilities at the Community Hub Leisure Centre site including a swimming pool and an extension to the leisure centre car park; b) The improvement of facilities at Frolesworth Road Recreation Ground; c) Recreation facilities accessible and suitable for all ages. d) A Community Building for young people. e) The creation of a new footway/cycleways to encourage pedestrian and cycle use, including a footway/cycleway alongside the B581 Broughton Way. to encourage pedestrian and cycle use f) Health care at the Community hub Leisure Centre site (see policy 18) or in the current Village Centre location. g) The improvement, remodelling or enhancement of education facilities at Hallbrook, Old Mill and Orchard Primary Schools, Thomas Estley Community College Broughton Astley Community Library lending stock plus reference, audio visual and homework support material; h) The extension of the existing Rights of Way networks to include along the former Midland Counties Railway line; i) Community infrastructure improvements</p>	Noted	None



			<p>including the provision of parish notice boards, defibrillator equipment, seats, bus shelters, litter bins and grit bins; footpaths and</p> <p>j) Village Centre improvements to promote foot fall, access to shops and amenities. Contributions will be phased or pooled to ensure the timely delivery of infrastructure, services and facilities where necessary. To ensure the viability of housing development, the costs of the Plan’s requirements may be applied flexibly where it is demonstrated that they are likely to make the development undeliverable.”</p> <p>We support draft policy 19 and agree that new development should support infrastructure provision. We recognise that new development will have an impact on existing infrastructure and will require new infrastructure, services and amenities to support growth. We wish to reinforce the opportunities available through the delivery of Land off Frolesworth Road.</p> <p>These infrastructure benefits include:</p> <ul style="list-style-type: none">• Provision of land immediately adjacent to the existing Orchard Church of England Primary School to facilitate its expansion together with necessary Section 106 obligations calculated on the number of new homes.• The expansion of Frolesworth Road Cemetery with parking provision• The expansion of Frolesworth Road Recreation Ground• The provision of land for a community facility in the heart of the site.		
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			<ul style="list-style-type: none"> • Retention and improvement to Public Rights of Way W60/2 and W48/4 • Community Allotments • Children’s play areas • Extensive and accessible public open space across the site with green infrastructure in the form of native planting and walkways • Sustainable Drainage systems in the form of swales and attenuation basins will effectively control surface water on Site • Gateway and speed reduction measures along the Frolesworth Road, on approach to Broughton Astley. <p>Whilst supportive of draft policy 19, we wish to reinforce the significant infrastructure provision available through the delivery of Land off Frolesworth Road. The same scale and level of public benefits / infrastructure cannot be secured on the Witham Villas site.</p>		
		Policy 27	<p>Trees and Hedgerows</p> <p>Draft Policy 27 seeks to protect existing trees and hedgerows in Broughton Astley, and we are fully supportive of this draft policy which states “New and existing trees should be integrated into new developments. Development that damages or results in the loss of ancient trees, hedgerows or trees of good arboricultural and amenity value will not normally be supported. Proposals should be designed to retain ancient trees, hedgerows or trees of arboricultural and amenity value. Proposals should be accompanied by a tree survey that</p>	Noted	None



			<p>establishes the health and longevity of any affected trees and hedgerows, indicating replanting where appropriate.”</p> <p>We agree with draft policy 27. We consider that any new development should seek to protect and enhance the existing trees and hedgerows within Broughton Astley and agree that any proposal should be accompanied by a tree survey that establishes the health and longevity of any affected trees and hedgerows, and indicative replanting is considered where appropriate.</p> <p>We confirm that any trees or hedgerows which are lost to facilitate the development, which may hold potential ability to identify with the national Biodiversity Net Gain requirements will be replaced. This will ensure that there is a material gain is lost linear biodiversity (hedgerow) and habitat (tree) species.</p>		
		Policy 28	<p>Climate Change and Flood Risk</p> <p>Draft Policy 28 sets out conditions to be applied to development to help prevent flooding and states: “Development proposals within the areas indicated in Figures 11.1 and 11.2 will be required, where appropriate, to demonstrate that the benefit of development outweighs the harm in relation to its adverse impact on climate change targets, and on the likelihood of it conflicting with locally applicable flood mitigation strategies and infrastructure.</p>	The policy will be updated where appropriate based on recently updated Environment Agency mapping.	Change to be made where indicated.



				<p>Proposals to construct new (or modify existing) floodwater management infrastructure (ditches, roadside gullies, retention pools, etc.), including within or close to the built-up areas, will be supported, provided they do not adversely affect important open spaces or sites and features of natural or historical environment significance.</p> <p>Development proposals of one or more dwellings and/or for employment or agricultural development should demonstrate that:</p> <ul style="list-style-type: none">i. if in a location susceptible to flooding from rivers or surface water, no alternative site to meet the local residential development need is available;ii. its location and design respect the geology, flood risk and natural drainage characteristics of the immediate area and is accompanied by a hydrological study whose findings must be complied with in respect of design, groundworks and construction;iii. it includes a Surface Water Drainage Strategy which demonstrates that the proposed drainage scheme, and site layout and design, will prevent properties from flooding from surface water, including allowing for climate change effects, and that flood risk elsewhere will not be exacerbated by increased levels of surface water runoff and that the development will not threaten other natural habitats and water systems;		
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			<ul style="list-style-type: none">iv. its design includes, as appropriate, sustainable drainage systems (SuDS) with ongoing maintenance provision, other surface water management measures and permeable surfaces;v. proposed SuDs infrastructure includes, where practicable, habitat creation comprising e.g. landscaping, access and egress for aquatic and terrestrial animals, and native species planting;vi. it does not increase the risk of flooding to third parties;vii. and it takes the effects of climate change into account.” <p>We note the importance of managing flood risk and climate change, however we consider that draft Policy 28 in its current form does not meet basic conditions (a) or (e) in that the draft policy demands over and above current National Policy e.g Paragraph 182 of the NPPF states that “Applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal.” Draft Policy 28 expects for development proposals to demonstrate that “that the proposed drainage scheme, and site layout and design, will prevent properties from flooding from surface water, including allowing for climate change effects, and that flood risk elsewhere will not be exacerbated by increased levels of surface water runoff..” We consider that the Neighbourhood Plan’s draft policy is not considered to be a proportionate request.</p>		
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			<p>The draft policy fails to meet basic condition (e) as Policy CC3 Managing flood risk of the adopted Harborough Local Plan states that “Development proposals subject to a site-specific flood risk assessment will only be permitted where: the mitigation, flood management, flood resilience measures, and design requirements identified are satisfactorily addresses; and the design incorporates flood resilience measures to allow for increased risk due to climate change.” Draft NP Policy 28 does not take a proportionate approach, but rather demands that proposed drainage schemes will prevent properties from flooding and flood risk elsewhere will not be exacerbated by increased levels of surface water runoff. The term elsewhere suggests offsite, third-party land and this is confirmed in point vi that states “it does not increase the risk of flooding to third parties,”. Whilst drainage proposals will endeavour to not increase flood risk to third party land, this is not a policy requirement within the adopted Local Plan.</p> <p>We wish to confirm that Land off Frolesworth Road is located in Flood Zone 1 and discussions have been held with the Lead Local Flood Authority (LLFA) regarding existing flooding issues within the village. Foul drainage will connect to the existing foul sewer network in Frolesworth Road. Modelling is required which will be completed by STW and we are working with STW and encouraging them to begin exploratory works early. We recognise that flood risk is a key concern to the local community in Broughton Astley and the proposed drainage strategy for Land off Frolesworth Road</p>	<p>But it is in the NPPF?</p> <p>Immaterial: The Frolesworth Road site is not a preferred location for housing locally and is not a NP allocation.</p>	
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			<p>has been designed to provide betterment over the existing uncontrolled discharge of surface water from the site in its current agricultural form.</p> <p>To further build resilience into the drainage strategy for the site and betterment over and above what is required of new development proposals, IM Land are committing to provide onsite attenuation for a 1 in 100-year storm event plus climate change with the discharge rate contained to the 1 in 1 year storm event. This means that the drainage system has been designed to cope with a very heavy rainstorm which has a 1% chance of happening in any year. The additional climate change allowance builds in further headroom capacity within the system. By nature of how the system works, the rainwater across the site is discharged beyond the peak rainfall and so provides betterment beyond the site. The enhanced sustainable urban drainage strategy represents up to 65% betterment over the existing greenfield scenario.</p> <p>We confirm that any forthcoming outline application on the Site will be accompanied by a Flood Risk Assessment and Climate Change Strategy demonstrating suitable and proportionate flood risk mitigation in light of climate change.</p>		
		General	<p>Broughton Astley Housing Needs Assessment (January 2023)</p> <p>The Broughton Astley Housing Needs Assessment (HNA) was published in January 2023 to support the</p>	<p>Noted.</p> <p>The minimum housing requirement was</p>	None



			<p>Neighbourhood Plan (to 2031) review. The Assessment uses the Office for National Statistics mid-2020 population estimate for Broughton Astley Parish, recognising that the population for the parish has increased since the 2011 Census. It is important to note that the HNA refers to the 2021 NPPF which is now superseded by the December 2024 NPPF.</p> <p>The HNA states that “at the time of writing, Broughton Astley has a zero residual housing requirement for the emerging new Broughton Astley Neighbourhood Plan to 2031, aside from the existing planning permissions, allocations, and completions already committed to through the previous Core Strategy and made Neighbourhood Plan to 2028.” Whilst the draft Neighbourhood Plan is based on the evidence provided at the time, the timing of the draft BANPR consultation, raises concern as to whether Broughton Astley Parish Council wish to deviate away from the current emerging evidence available at this present time. In addition, the delayed submission version of the emerging local plan has allowed the draft BANPR to try to get ahead of the emerging local plans’ timeline.</p> <p>Under the NPPF and revised Standard Method, Harborough’s housing need has risen from 557 to 771 homes per year, reflecting both local requirements and Leicester’s unmet need. We recognise the intention to support some sustainable growth through the allocation of the Witham Villa’s Site for 138 dwellings. The proposed</p>	set by HDC, not through the HNA.	
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			<p>draft allocation does wish to show willingness to support growth in the Village, however we consider that the draft Neighbourhood Plan is relying on the HNA which was published in January 2023 and is based upon superseded National Policy.</p> <p>At the present time of writing this representation, the emerging Local Plan has reached regulation 19 stage and is due to be submitted for independent examination in March 2026. As such, we consider that the Broughton Astley NPDMG should acknowledge and align with the emerging housing requirement for the Broughton Astley Neighbourhood Area to ensure conformity.</p>		
		General	<p>Broughton Astley Neighbourhood Plan Site Options and Assessment (July 2023)</p> <p>The Site Options and Assessment Report used to support the preparation of the draft BANPR was undertaken by AECOM. Within this evidence, eleven sites were identified as available and suitable for development and three sites were identified as potentially suitable for development, subject to suitable mitigation of constraints. These sites included:</p> <ul style="list-style-type: none"> • 21/8144 – Land north of Cottage Lane • 21/8154 (NP03) – Land off Frolesworth Road • NP02 – Old Mill Road 14.2.2 <p>The report advises that should the Monitoring Group decide to propose allocations for residential development, the next</p>	<p>Noted.</p> <p>The minimum housing requirement was set by HDC, not through the site assessment report.</p>	None



			<p>steps would be for the Parish Council to select the sites for allocation in the Neighbourhood Plan, based on:</p> <ul style="list-style-type: none">• The findings of this site assessment;• An assessment of viability;• The aims and objectives of the Neighbourhood Plan;• Community Consultation and consultation with landowners;• Discussions with HDC;• Any other relevant evidence that becomes available; and• Other considerations such as the appropriate density of the proposed site(s) to reflect local character. <p>As a result of the process, the draft BANPR has allocated a single site for residential development. Since this time, two updated versions of the NPPF were published; the December 2024 NPPF amending housing requirements through the introduction of a new Standard Method; a new Government with a focus on housing growth are in office; and Broughton Astley's sustainable and desirable location, have all contributed to the settlement's suitability for housing growth.</p> <p>Similarly, to the AECOM HNA, the AECOM Site Options and Assessment Report was prepared in July 2023 and refers to the July 2021 NPPF and therefore relates to the housing requirement at a point in time and is now considered to be based on superseded National Policy, breaching basic condition (a).</p>		
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			<p>Outcome of the Alternative Sites Public Consultation</p> <p>Between Tuesday 26th August 2025 to Wednesday 24th September 2025, Broughton Astley Parish Council undertook a Public Consultation to put forward seven alternative sites to identify a preferred site, favourable by the local community.</p> <p>The outcome of Broughton Astley’s public consultation on the alternative sites put forward can be found at Appendix 7 and states that of the seven possible sites put forward, four were identified as preferred options. These include:</p> <ul style="list-style-type: none"> • Crowfoot Way • Witham Villa • Cottage Lane • Blockley Road <p>The Statement explains that the four sites above received the highest levels of feedback and were therefore examined at greater detail. The analysis considered factors including;</p> <ul style="list-style-type: none"> • Site location and deliverability • Potential housing numbers • Traffic and transport infrastructure • Flooding and drainage concerns • Impact on the village centre • Proximity to local amenities • Environmental impact <p>The statement explains that the remaining three sites of Frolesworth Road West, Frolesworth Road East and Clump</p>	Noted	None
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				<p>Hill, received fewer than 100 responses each and did not score highly enough for further detailed assessment.</p> <p>As understood, the Witham Villa site has been selected by the Parish Council as the preferred site for allocation within the emerging Neighbourhood Plan.</p>		
		General		<p>The Site at Frolesworth Road, Broughton Astley</p> <p>We wish to reiterate that we consider that delivery of draft allocated Site; Land off Frolesworth Road is more comprehensive than a combination of smaller sites, seeking to meet Harborough’s Housing Need in Broughton Astley.</p> <p>One larger comprehensive application will deliver significant benefits to the local community in the form of Section 106 contributions and obligations and as identified previously, development of the Site would see the delivery of a Community Healthcare Hub, expansion to the existing Orchard Church of England Primary School, expansion of the existing recreational sports ground to the east of the Site as well as inclusion of a carpark for the existing Frolesworth Road Cemetery. We confirm that the draft NPR in its current form, does not meet Broughton Astley’s identified housing requirement in its current form, conflicting with Basic Conditions (a) and (e).</p>	<p>Noted. The Frolesworth Road site is not a preferred location for housing locally and is not a NP allocation.</p>	<p>None</p>



			<p>Broughton Astley Design Codes and Guidance</p> <p>The Broughton Astley Neighbourhood Plan steering group has established a Design Code and Guidance document to influence the character and design of any new development within the neighbourhood area. Stantec have reviewed the Design Code Report produced by AECOM (June 2023) and wish to make the following comments.</p> <p>The National Model Design Code describes design codes as ‘simple, concise, illustrated design requirements that are visual and numerical wherever possible to provide specific, detailed parameters for the physical development of a site or area.’ This document sets out design codes for character areas, along with guidance as to how the codes should be applied and will apply to allocations and speculative development in the neighbourhood area.</p> <p>The Land off Frolesworth Road is not identified within the design code, within the six-character areas. However, the Site is directly adjacent to the Primethorpe Character Area. Chapter 4 of the Design Code sets out the neighbourhood area wide code to prioritise the character and quality of new development and includes several key topics of community importance. The following topics are addressed by the design code including:</p> <ul style="list-style-type: none">• A – Character• B – Layout• C – Infill Development• D – Landscape, Views and Settlement Edges	Noted	None
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			<ul style="list-style-type: none"> • E – Natural Features • F - Sustainability <p>We recognise the granular design requirements set out within the code and confirm that adherence to design codes A, B, D, E will be addressed within a Design and Access Statement submitted alongside any forthcoming application at Land off Frolesworth Road. A Climate Change Strategy will acknowledge the requirements of Code F, and all codes will be responded to, at detailed reserved matters stage. Overall, we support the inclusion of a Design Code for Broughton Astley and recognise the importance of preserving and maintain the distinct character of the village.</p>		
		General	<p>Summary and Conclusions</p> <p>This representation has been made by Stantec on behalf of IM Land and the Landowners in relation to the Pre-submission Broughton Astley Parish Council Neighbourhood Plan (November 2025) ('the draft BANPR') with regard to the draft policies and associated evidence base relating to Site BA1, Land Off Frolesworth Road ('the Site').</p> <p>IM Land consider that the draft BANPR does not meet the 'basic conditions' and we have concerns on a number of the draft policies and associated evidence base. The draft BANPR, in its current form does not meet the housing requirement figure for the Neighbourhood Area, as</p>	Noted	None



			<p>identified by the government’s standard method and Harborough District Council’s emerging Local Plan (Policy DS01) and its supporting evidence base. As currently prepared, the BANPR would conflict with and risk the delivery of a minimum of 475 dwellings at Broughton Astley. As drafted, the draft BANPR would undermine the delivery of a minimum of 475 dwellings on the draft allocated Site BA1 in HDC’s emerging Local Plan, in conflict with the NPPF and the PPG.</p> <p>We reaffirm that the most sustainable approach to development at Broughton Astley is for the NPR to be consistent with the emerging Local Plan. Specifically, the BANPR should include the allocation of Land off Frolesworth Road (Site BA1 in the emerging Local Plan), which will help to achieve some of the other related aims and policy aspirations of the BANPR.</p> <p>We trust these representations are helpful to inform the next stage of the draft BANPR. IM Land reserve the right to comment further on the Neighbourhood Plan as it progresses and would welcome the opportunity to meet with Broughton Astley Parish Council to discuss these representations. We also respectfully request that we are kept informed with the progression of the draft BANPR moving forwards.</p>		
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26			Rachel Bryan - Sworders			
		Policy 1		<p>RESIDENTIAL SITE ALLOCATION:</p> <p>Whilst we welcome the principle of allocating a development site in addition to the eLP allocation, insufficient evidence has been provided to demonstrate that this is the most appropriate site to allocate. The site selection process is opaque and it appears that the site has been chosen based on the preference of the Parish Council, as opposed to a robust and objective site selection and assessment process.</p> <p>The AECOM <i>Site Options and Assessment 2023</i> demonstrates that 19 sites were identified through the HDC and Broughton Astley Parish Council Call for Sites exercises. The initial site assessment process identified 11 of these as suitable and appropriate for allocation and lists them, as well as details of the site assessments, in the Assessment. We consider this early stage of the process to be transparent and robust.</p> <p>The AECOM Assessment advised that the next steps were for the Steering Group to select sites for allocation in the BANP, based on the findings of the AECOM Assessment, an assessment of viability, the</p>	Noted. The site has been subject to a detailed site assessment process and significant community consultation and is considered by the Qualifying Body to be the most appropriate site locally.	None



			<p>aims and objectives of the Neighbourhood Plan, community consultation and consultation with landowners, discussions with HDC, any other relevant evidence that becomes available and other considerations such as the appropriate density of the proposed site(s) to reflect local character.</p> <p>However, according to the <i>Statement to Support Housing Development Allocation in Neighbourhood Plan</i>, this process appears not to have been followed.</p> <p>The Statement reports that of the 11 suitable sites, only seven sites were presented at public drop-in consultation events as potential development locations. Of these seven, four emerged as the most positively received by the community. Only these four preferred sites were then subject to objective assessment against criteria including transport connectivity, site access, landscape impact, flooding considerations, and overall deliverability.</p> <p>The Statement does not provide details of which seven sites were presented to the community, or the reason that the other four suitable sites were not presented. Nor does it provide any reason or justification for choosing the four preferred sites. It simply reports that the Witham Villa site was identified as the most suitable and sustainable location for future development.</p>	<p>As above. All available sites were presented to the community.</p>	<p>None</p>
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			<p>Without providing any information on which the chosen/excluded sites were or justification for why they were chosen/excluded, it is impossible to establish whether the Witham Villa site is the most suitable for allocation.</p> <p>Any of the other 11 suitable sites could be equally or more suitable for development. For example, Site 21/8159 – Land off Crowfoot Way scored well in the AECOM Assessment, being assessed as “<i>suitable for development and available</i>”. However, we do not know if it was presented to the community at any of the drop-in events and if so, why it was not selected.</p> <p>The site is suitable and available for development. It is also uniquely located adjacent to Hallbrook Primary School so could potentially deliver land for expansion in the future, should this be required.</p> <p>The landowners were not invited to participate in any consultation events or provide any additional information in respect of the site but would welcome the opportunity to do so.</p> <p>The National Planning Policy Framework (NPPF) sets out how development plans (which includes Neighbourhood Plans) should be prepared. Whilst Neighbourhood Plans do not need to meet the more rigorous tests of soundness that Local Plans must meet, they must meet the basic conditions. One of these is condition a) to have regard to national policy.</p>		
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			<p>National Policy contained within the NPPF states that plans should “<i>be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.</i>” It further states that the “<i>preparation and review of all policies should be underpinned by relevant and up-to-date evidence</i>” which should be “<i>adequate and proportionate</i>”.</p> <p>If the Neighbourhood Plan were to proceed with Policy 1, without a robust evidence base to demonstrate that it is underpinned by effective engagement and adequate evidence it would fail to meet basic condition a).</p>		
		Policy 2	<p>LIMITS TO DEVELOPMENT</p> <p>The adopted Local Plan does not include limits to development and instead contains a “Settlement Development” policy which explains how proposals are to be treated based on whether they are within the built-up area or adjoining the built-up area.</p> <p>The eLP has a similar policy, but includes reference to 'settlement limits' where these are established in Neighbourhood Plans. The settlement limits are treated as the built-up area, meaning development adjacent to it</p>	<p>Noted.</p> <p>We prefer to retain the wording as included in the NP Review to help manage development within and outside the Settlement Boundary.</p>	None



			<p>can still be permitted subject to meeting certain conditions.</p> <p>The NPPF allows development outside of development limits in certain circumstances, in a similar way to the Local Plan.</p> <p>We support the Local Plan approach of allowing flexibility for sites outside of settlement limits to be delivered, where appropriate. However, it does leave some uncertainty in respect of where the built-up area is, when it is not defined.</p> <p>As such, we have no objection to the proposal to define settlement limits via the Neighbourhood Plan.</p> <p>However, we object to the following wording in Policy 2:</p> <p><i>“Land outside the Limits to Development is treated as open countryside, where development will be carefully managed in line with the provisions of this Neighbourhood Plan, the strategic policies of the Local Plan and national policies.”</i></p> <p>To conform with both the current and emerging Local Plans, there should be a distinction between open countryside beyond limits to development and land adjoining the limits to development.</p> <p>This sentence should either be deleted or replaced with: <i>“Land outside the Limits to Development is to be carefully managed in line with the provisions of the Neighbourhood</i></p>		
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			<p><i>Plan, the strategic policies of the Local Plan and national policy.”</i></p> <p>Without this amendment/deletion, the Neighbourhood Plan would fail to meet the basic conditions. Specifically condition a) to have regard to national policy, and condition e) that the Neighbourhood Plan is in general conformity with the strategic policies contained within the development plan for the area of the authority.</p>		
		Policy 3	<p>WINDFALL HOUSING</p> <p>We support principle of this policy which allows windfall housing. However, we object to some of the conditions placed on windfall housing as they are unnecessary and render Policy 2; Limits to Development, ineffective.</p> <p>The purpose of defining limits to development is to create an NPPF compliant presumption in favour of sustainable development within them. They clarify where development is acceptable in principle and where it is not. It is therefore unnecessary and overly restrictive, to include conditions a), b) and c).</p> <p>The limits to development should be drawn to incorporate gaps, respect the settlement form and use existing boundaries. Development of land within these limits to development should be supported in principle; the presumption should be in favour of sustainable</p>	<p>Noted.</p> <p>The policy seeks to shape development within the Limits to Development which is the purpose of neighbourhood planning.</p>	None



			<p>development, whether or not the comprises a gap, respects form or uses existing boundaries.</p> <p>The benefit of drawing limits to development is to add certainty in respect of where development will and will not be acceptable. To include additional conditions which relate to form and boundaries reintroduces the uncertainty of the Local Plan policy and means that Policy 2 adds no value. It also conflicts with the NPPF and has the effect of frustrating the operation of the Local Plan and eLP settlement development policies.</p> <p>We have no objection to conditions d) and e) as these add detail which protect amenity and character.</p> <p>For this policy to conform with national and local policy and thereby meet basic conditions a) and e), conditions a), b) and c) should either be deleted or relate only to land outside of the limits to development</p>		
		General	<p>SUMMARY</p> <p>We welcome this opportunity to comment on the BANP at this stage.</p> <p>As drafted, the BANP cannot meet the basic conditions. The allocated site is not underpinned by effective engagement and adequate evidence. Development both inside and outside of limits to development is subject to</p>	<p>Noted.</p> <p>We disagree that the NP Review fails to meet the Basic Conditions.</p>	None



				<p>overly restrictive conditions which do not accord with local or national policy.</p> <p>As such, the BANP is in conflict with national policy and the local development plan it will ultimately be examined against.</p> <p>The solution is for the evidence base and site assessment process to be revisited, and a revised strategy proposed and consulted upon which is capable of meeting the basic conditions.</p>		
27			Richard Brown – Vistry Group/ Pegasus Group			
	4			<p>We support the proposed allocation set out in Policy 1. We concur with the Council’s document: “Statement to Support Housing Development Allocation in Neighbourhood Plan”. This documents the thorough process that has been undertaken in arriving at the site allocation set out in Policy 1 and therefore meets basic condition (d), specifically that the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development. This is considered in more detail below.</p>	Noted	None



			<p>Summary of Site Selection Process</p> <p>All sites in the Parish have been assessed through the Broughton Astley Neighbourhood Plan Site Options and Assessment prepared by AECOM dated July 2023 (AECOM Site Assessment). Our client's site at Witham Villa was assessed under site reference 21/8220 (Harborough District Council SHELAA reference) and NP04 (Parish Council Call for Sites reference). The Site Assessment was based on the findings of the District Council's Strategic Housing and Employment Land Availability Assessment (SHELAA) and together considered the planning history of each site, environmental considerations including heritage, flood risk, agricultural land use, Tree Preservation Orders, as well as the relationship of the site with community facilities and services.</p> <p>The AECOM Site Assessment notes that:</p> <p>“The SHELAA conclusions are supported by the available evidence and are reasonable to be carried forward to the NP assessment. Whilst there are some constraints it is considered that they are surmountable”.</p> <p>The AECOM Site Assessment categorised sites as either Green, Amber or Red. The Witham Villa site was rated as Green, which the Assessment defines as:</p>		
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			<p>“Green is for sites which are free of constraints, or which have constraints that can be resolved, and therefore are suitable for development. Sites rated green are appropriate for allocation for the proposed use in a Neighbourhood Plan”.</p> <p>The AECOM Site Assessment confirms that the site is suitable and available, that there are no landscape or heritage designations that would preclude development and therefore provides an appropriate site for allocation in the Neighbourhood Plan to meet housing needs.</p> <p>The technical evidence prepared to underpin the proposed concept masterplan for the site at Witham Villa (Appendix B) confirms the findings of the site assessment that this site is suitably and sustainably located for housing development and has no significant constraints or relevant designations which would prevent development of the site.</p> <p>The Witham Villa site benefits from the following:</p> <ul style="list-style-type: none">• Single landowner.• Single developer with control of the site with proven track record of delivery.• Safe and suitable access to the existing road network.• Excellent connectivity to walking and cycling routes and public transport.• No significant site constraints that cannot be mitigated.• An additional opportunity to continue and expand the green corridor running through the Estley Green development.		
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			<ul style="list-style-type: none">• Sustainable site location benefiting from a range of services and facilities including access to the following within 15 minutes' walk:• Old Mill Primary School• Aldi Store • Broughton Astley Leisure Centre• Thomas Estley Community College• The Pre-School Playstation• Frolesworth Road Recreation Ground• Estley Green Business Park and Cottage Lane Industrial Estate.• Broughton Astley Village Hall• Broughton Astley Scout Hut• Broughton Veterinary• St Mary's Church• White Horse Pub <p>The conclusions of the site assessment are also supported by the findings of the Pre-Submission Local Plan Sustainability Appraisal (Site ID 21/8220: Land at Witham Villa, Broughton Road). The appraisal found the site to have a positive effect on sustainability objectives SA6 (Health and Wellbeing), SA8 (Services, Facilities and Education), SA9 (Housing), SA10 (Economic Growth) and SA13 (Sustainable Travel). It was also found to have no significant negative effects.</p> <p>The site is controlled by Vistry Group, developers and promoters of residential developments, and will deliver the site, which is in single ownership. Vistry Group is one of the top five housebuilders in the UK by volume. As one of the country's leading housebuilders, Vistry was formed in</p>		
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			<p>January 2020 following the successful acquisition of Liden Homes and the Galliford Try Partnerships & Regenerations businesses by Bovis Homes Group PLC. The site is therefore available and achievable.</p> <p>The AECOM Site Assessment set out next steps and identifies a range of factors to be considered by the Neighbourhood Plan Steering Group in considering sites for allocation, and these include consultation and other evidence appropriate density to reflect local character and the aims and objectives of the Neighbourhood Plan.</p> <p>Site Selection Conclusion</p> <p>It is not a requirement for the Neighbourhood Planning Group to publish a Sustainability Appraisal, and so the fact that it has published a detailed site assessment produced by independent consultant demonstrates sufficient and proportionate evidence that the Neighbourhood Plan guides development in a sustainable manner.</p> <p>The Neighbourhood Planning Group therefore provides sufficient and proportionate evidence on how the draft neighbourhood plan guides development to sustainable solutions and therefore meet basic condition (d).</p>		
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		Policy 1	<p>We note paragraph 4.3 states that</p> <p>“The allocation through the Neighbourhood Plan of an additional site to that allocated through the Local Plan will help ensure that as the housing requirement for the Neighbourhood Area changes over the Plan Period, sufficient provision is made locally to meet a local housing need in a locally appropriate location”.</p> <p>We support this approach of identifying an additional allocation within the Neighbourhood Plan, as this will provide a key part in the Local Planning Authority’s ability to refuse speculative applications where the ‘tilted balance’ is engaged within the presumption in favour of sustainable development identified in paragraph 11 (d) of the National Planning Policy Framework.</p> <p>The ‘tilted balance’ being engaged in certain circumstances, including if the Local Planning Authority could not maintain a 5-year land supply of housing land or policies become out of date for other reasons, would make it easier for speculative planning applications to be permitted. The proposed approach will provide a degree of protection as set out in paragraph 14 of the December 2024 NPPF.</p>	Noted	None
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			<p>In this way, the Neighbourhood Plan meets basic condition (a) of having regard to national policies and advice contained in guidance issued by the Secretary of State.</p> <p>With regard to the requirements of Policy 1 which are:</p> <ul style="list-style-type: none">a) The housing mix should be in line with Policy 4.b) The design of dwellings should follow Policy 6 on design.c) A footpath is created to link the site to the traffic lights on the Cosby Road/Broughton Way crossroads. <p>Our client's site at Witham Villa can deliver a policy compliant scheme with an appropriate density and design response to the reflect the local character, with no viability issues. This is supported by our Concept Masterplan and Pedestrian and Cycle Movement Strategy which are appended to this representation.</p> <p>The Neighbourhood Planning Group therefore provides sufficient and proportionate evidence on how the draft neighbourhood plan guides development to sustainable solutions and therefore meet basic condition (d).</p> <p>This paragraph states that Housing and Economic Needs Assessment (HEDNA) for Leicester and Leicestershire was published on 31 January 2017. The Policy should refer to the most up to date evidence and the most up to date HEDNA was published in April 2022.</p>		
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		Policy 19	<p>We note that the reasoned justification to Policy 19 Infrastructure states that contributions are governed by provisions of the Community Infrastructure Levy Regulations 2010.</p> <p>Policy 19 itself states that “New development will be supported by the provision of new or improved infrastructure, together with financial contributions for the following off-site infrastructure requirements where appropriate”. (emphasis added)</p> <p>We support the intended approach that contributions will only be sought where they meet the legal requirements in the CIL Regulations, but for clarity and for the avoidance of doubt, Policy 19 itself should refer to legal requirements that developer contributions must meet.</p>	<p>Noted</p> <p>The policy identifies the infrastructure improvements that are supported locally.</p> <p>Reference to legal requirements are not considered necessary.</p>	None
		Policy 26	<p>Figure 10 identifies wildlife corridors in Broughton Astley.</p> <p>We note that Policy 26 states:</p> <p>“Development proposals should not adversely affect the habitat connectivity provided by the wildlife corridor identified in figure 10”.</p> <p>Appendix B to this representation, we have included a concept masterplan which reflects a detailed consideration</p>	Noted	None



				of the site and its context. We consider that development illustrated in our concept masterplan enables a development that would comply with Policy 26.		
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