

Great Bowden Review Neighbourhood Plan

Summary of representations submitted by Harborough District Council to the independent examiner pursuant to amended Basic Conditions Statement consultation June 2026

	Name	Full Representation
1	Avison Young on behalf of Jelson Homes Ltd	Representations to Great Bowden Neighbourhood Plan Review Consultation on Updated Statement of Basic Conditions on Behalf of Jelson Homes Ltd Avison Young is instructed by Jelson Homes Ltd to provide town planning advice in relation to land which it controls to the north of Leicester Lane, Great Bowden. Avison Young made representations to the recent Regulation 16 consultation on the Great Bowden Neighbourhood Plan Review (GBNPR) on Jelson's behalf on 1 April 2026 and updated representations on 22 April 2026. As explained in the representations dated 22 April 2026, Jelson submitted an outline planning application for the residential development of its land for up to 52 dwellings in October 2025 (Ref. 25/01492/OUT). The application was reported to the District Council's Extraordinary Planning Committee meeting on 16 April 2026. The application was recommended for approval and received a resolution to grant planning permission from members of Planning Committee, subject to conditions and the completion of a Section 106 agreement. Jelson is in the process of working with the LPA to agree the Section 106 legal agreement. The Council has, therefore, accepted that: i) there is a need for additional housing in this location in the short-term; ii) that Jelson's site is a suitable and sustainable location for housing development; and iii) it will boost the supply of housing in the District in the short-term in accordance with national policy. For these reasons and to ensure that the GBNPR has regard to national policy, in particular the objective to "<i>significantly boost...</i>" the supply of homes, and would contribute towards, rather than constrain, sustainable development (i.e. would comply with the basic conditions), the settlement boundary shown at Figure 2 in the GBNPR (as referred to in draft Policy G1) should be amended to reflect the fact that the site has a resolution to grant planning permission for housing. This would also ensure consistency with other amendments which have been made to settlement boundaries to reflect planning permissions granted in Great Bowden. Furthermore, our view remains that there is no justification for the proposed expanded Area of Separation to the north of Leicester Lane under draft Policy ENV1. This policy and the proposed Area of Separation fail to have regard to national policy which seeks to boost the supply of housing and direct development to sustainable locations (i.e. could unnecessarily constrain the delivery of important national policy objectives and fail to comply with the basic conditions). We remain of the view that the reference to the expanded Area of Separation should be removed from the GBNPR entirely. However, as a minimum, Jelson's site ought to be removed from any expanded Area of Separation under draft Policy ENV1, to ensure that the GBNPR has regard to national policy in particular the objective to "<i>significantly boost...</i>" the supply of homes, and would contribute towards, rather than constrain, the achievement of sustainable development. On this basis, whilst it is noted that there has been a change in the 'basic conditions' against which Neighbourhood Plans are assessed we disagree with the conclusions of the Statement of Basic Conditions (May 2026) and remain of the view that amendments are required to ensure that the emerging GBNPR meets the basic conditions. We would be grateful if you could please confirm receipt of this letter and thereafter keep me informed on the progress of the GBNPR and advise of the dates of any hearing sessions.

2	Godrey Payton by Philip Cowen	As you aware we have been engaging with the Great Bowden NDP Review process, and I am grateful for your various emails keeping us informed. I am conscious that the consultation process in respect of the Basic Conditions Statement closes today, and hence I have been through the updated May 2026 Basic Conditions Statement in the context of the observations which were submitted as part of the Regulation 16 consultation process previously. In general terms, inclusion of the new Basic Condition E is welcomed (whereby “the neighbourhood plan must not prevent development proposed in the Local Plan, particularly housing delivery”), although it is difficult to understand the subsequent statement that the Reg 19 draft Local Plan policies exceed the identified housing requirement for Great Bowden; Consequently we ask the Examiner to consider carefully whether he supports the view that “the new Basic Condition is met”, as is being suggested by the final draft NP. I admit that I may have misunderstood or misread the position which is being set out within the updated Basic Conditions Statement, particularly in the short time available, but equally from our own understanding of the key details relating to the emerging Local Plan it appears as though the emerging NP has not fully addressed the needs to the emerging Local Plan from either a local or national planning policy perspective. We ask both the Parish Council and the Examiner to consider this point carefully as part of the ongoing assessment process. At Para 3.2, it is suggested that he NP “has been informed by the evidence base of the Harborough Local Plan, which was adopted in April 2019 and the emerging Harborough Local Plan which is at Regulation 19 stage.” Considering the data and reports which formed part of the emerging NP development process, and in particular the Aecom report which did not taken on board submissions that had been made to Harborough District Council with regard to specific sites previously, it is difficult to understand how the emerging NDP has been informed by the emerging Harborough Local Plan which is now at Reg 19 stage. It appears there are some significant inconsistencies between the two processes. In particular we would ask the Examiner to interrogate and challenge the statement in the updated Basic Conditions Statement that “The Qualifying Body considers that the Neighbourhood Plan is in general conformity with the strategic policies of the Local Plan and the policies have been designed to add local context to the development plan policies of the area. In addition, new basic condition E is fulfilled because i) the making of the Neighbourhood Plan would not have the effect of preventing development from taking place which is proposed in the development plan for the neighbourhood area because it includes an allocation for residential development which exceeds the identified housing requirement figure for the area, and ii) the NP also has policies which will guide housing to be sustainable and appropriate for Great Bowden”. The other points as referred to within our previous representation also remain pertinent to the development of the NDP. On a separate matter, we are aware of the Examiner's unaccompanied visit to the village, and the subsequent clarification questions which were issued on 28th April. From the HDC website it would appear as though 4 responses have been received from the Parish Council and District Council, as they are identified on the NDP webpage. However the weblinks to those responses are not active, and hence cannot be viewed at the present time. In particular it would have been helpful to have been able to read the Parish Council's response to the clarification questions when considering whether further observations should be brought to the attention of the Examiner with regard to the updated Basic Conditions Statement, as the Parish Council's response may well indicate the extent to which they are attempting to follow the lead of the emerging Local Plan process, or otherwise. In the circumstances, it would be helpful for the current consultation process to be extended by a further period of not less than 2 weeks beyond the date when the links to those documents are activated, if at all possible.
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		Please do keep us informed of progress with the examination process, and thank you for your assistance to date.	
3	Leicestershire County Council	Any overarching comments	Policy T1: Parking Provision and New Dwellings that the Local Highway Authority would expect parking should be provided in accordance with Table 28: Residential Parking Standards of the Leicestershire Highway Design Guide: https://www.leicestershirehighwaydesignguide.uk/highway-layouts-and-design/parking-and-making-provision-service-vehicles/street-residential-car. Further information on Parking and making provision for service vehicles can be found here: https://www.leicestershirehighwaydesignguide.uk/highway-layouts-and-design/parking-and-making-provision-service-vehicles
		Section 98	
		(A1)A neighbourhood development plan may include	
		(a) policies (however expressed) in relation to the amount, type and location of, and timetable for, development in the neighbourhood area in the period for which the plan has effect; (b) other policies (however expressed) in relation to the use or development of land in the neighbourhood area which are designed to achieve objectives that relate to the particular characteristics or circumstances of that area, any part of that area or one or more specific sites in that area;	At the point of reviewing the Great Bowden Neighbourhood Plan, our findings and comments are below. Based on the proposed 100 dwellings, this is expected to generate approximately 30 primary aged pupils and 20 secondary aged pupils. Great Bowden Primary School currently does not have sufficient capacity to accommodate the total number of primary aged pupils arising from this development. However, analysis of local primary school provision indicates that other primary schools serving Market Harborough may be able to absorb the additional demand generated.

			Secondary provision presents a greater challenge. Market Harborough is experiencing sustained high demand for secondary school places, with both local secondary schools currently operating at full capacity. Welland Park Academy has reached the physical limits of its site and no further expansion works can be undertaken to increase capacity. Robert Smyth Academy is also at capacity for both secondary-aged and post-16 pupils. Consequently, the provision of a new secondary school will be required to meet future local demand, and developer contributions towards its delivery will be necessary. Financial contributions towards Special Educational Needs and Disabilities (SEND) and Early Years provision will also be required to mitigate the wider impacts of this growth.	
		(c) details of any infrastructure requirements, or requirements for affordable housing, to which development in accordance with the policies, included in the plan under paragraph (a) or (b), would give rise;		
		(d) requirements with respect to design that relate to development, or development of a particular description, throughout the neighbourhood area, in any part of that area or at one or more specific sites in that area, which the qualifying body considers should be met for planning permission for the development to be granted."		
		(2B) So far as the qualifying body considers appropriate,		

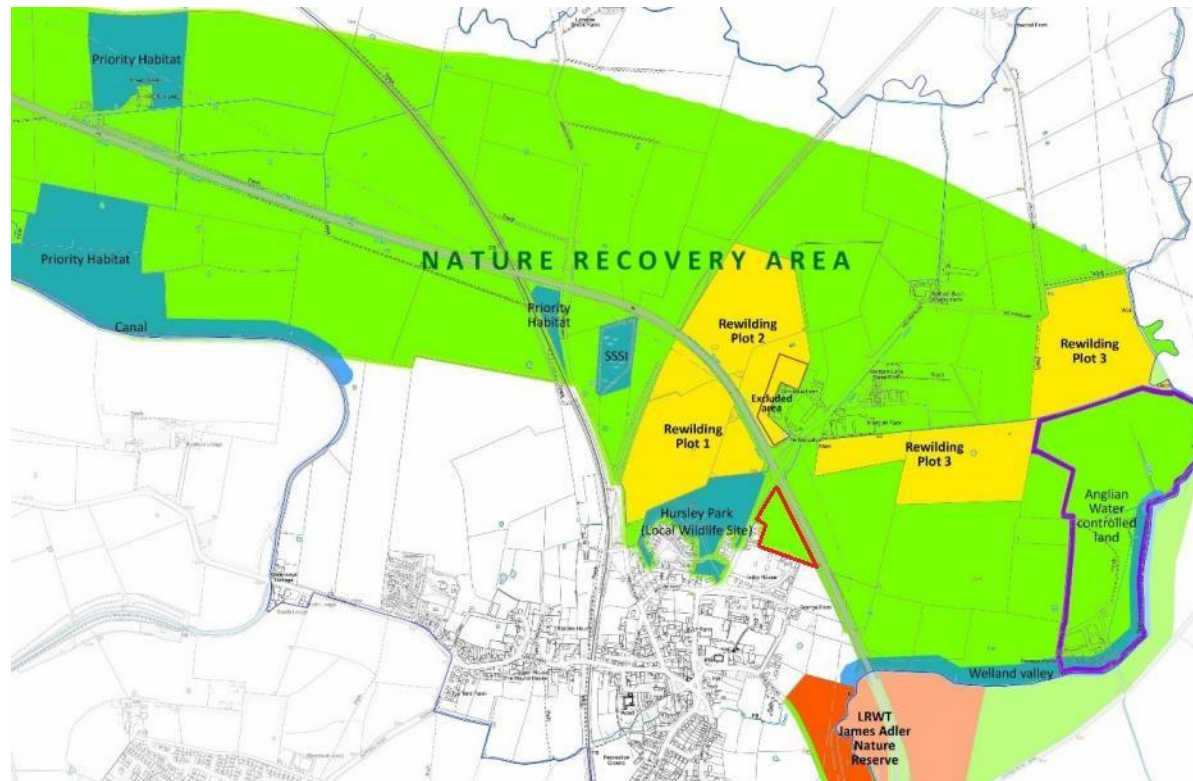
		having regard to the subject matter of the neighbourhood development plan, the plan must		
		(a) be designed to secure that the development and use of land in the neighbourhood area contribute to the mitigation of, and adaptation to, climate change, and	In comments previously made, the LCC Climate Resilience team noted ways through which the Plan could be enhanced to ensure better integration of climate adaptation measures into new developments.	
		(b) take account of any local nature recovery strategy, under section 104 of the Environment Act 2021, that relates to all or part of the neighbourhood area, including in particular	The LNRS is mentioned briefly in the Plan under policy ENV 10 but none of (i), (ii) or (iii) are addressed directly within the Plan.	
		(i) the areas identified in the strategy as areas which		
		(A) are, or could become, of particular importance for biodiversity, or		
		(B) are areas where the recovery or enhancement of biodiversity could make a particular contribution to other environmental benefits,		
		(ii) the priorities set out in the strategy for recovering or		

		enhancing biodiversity, and	
		(iii) the proposals set out in the strategy as to potential measures relating to those priorities.	
		(2C)The neighbourhood development plan must not	
		(a) include anything that is not permitted or required by or under subsections (A1) to (2A) or regulations under subsection (4), or	The wording of Policy ENV10: Nature Recovery and Biodiversity net Gain includes the following text: <i>'The area indicated in Plot 2 is excluded from the allocation as a potential area for infrastructure. Identified infrastructure requirements for waste management facilities will be supported in the excluded area of plot 2'.</i> The Minerals and Waste Planning Authority (MWPA) has previously requested that this section of the text either be removed or amended to remove reference to waste management facilities as this is a County Matter and is not permitted to be included in a neighbourhood plan under Section 61(K) of the Town and County Planning Act 1990, as amended.
		(b) be inconsistent with or (in substance) repeat any national development management policy.	
		Section 99	
		(1) In paragraph 8(2) of Schedule 4B to TCPA 1990 (basic conditions for making neighbourhood development order or neighbourhood plan)	
		(a) for paragraph (e) substitution	
		(ea) the making of the order would not have the effect of	

		preventing development from taking place which		
		(i) is proposed in the development plan for the area of the authority (or any part of that area), and		
		(ii) if it took place, would provide housing		
		(b) after paragraph (f) Substitution		
		(fa) any requirements imposed in relation to the order by or under Part 6 of the Levelling-up and Regeneration Act 2023 (environmental outcomes reports) have been complied with		
		(2)In section 38C(5) of PCPA 2004 (neighbourhood development plans: modifications of Schedule 4B to TCPA 1990), in paragraph (d)		
		(ea) the making of the neighbourhood development plan would not result in the development plan for the area of the		

		authority proposing that less housing is provided by means of development taking place in that area than if the neighbourhood development plan were not to be made,” , and		
		(3) In paragraph 11(2) of Schedule A2 to PCPA 2004		
		(ca) the making of the plan would not result in the development plan for the area of the authority proposing that less housing is provided by means of development taking place in that area than if the draft plan were not to be made		
		(da) any requirements imposed in relation to the plan by or under Part 6 of the Levelling-up and Regeneration Act 2023 (environmental outcomes reports) have		

		been complied with	
4	Donna Holmes OD Midlands National Highways	Location: Great Bowden Neighbourhood Plan Review - Basic Conditions Statement Consultation Many thanks for your correspondence dated 21 May 2026 Further to your consultation below in relation to the above named planning application, please be advised that due to the distance of the site from the strategic road network National Highways has no comment to make.	
5	Stephen Mair Mair Land and Planning Consultants	RE: GREAT BOWDEN NEIGHBOURHOOD PLAN REVIEW BASIC CONDITIONS STATEMENT CONSULTATION In response to the above consultation, I am writing on behalf of landowner clients, who own land off Welham Road, Great Bowden (outlined red on the accompanying Location Plan). I have previously written to the Council outlining concerns relating to Policy ENV 10: Nature Recovery and Biodiversity Net Gain of the Great Bowden Neighbourhood Plan. The land proposed for designation under Policy ENV 10 in the Great Bowden Neighbourhood Plan includes my client's land. This land should not be allocated under Policy ENV 10. Policy ENV 10 states <i>'The Neighbourhood Area includes land covered by a new initiative by Harborough Council and its partners to create a landscape-scale Nature Recovery Area, including sites for rewilding and biodiversity net gain.'</i> My clients are not 'partners' of Harborough District Council as described in the policy and do not intend to facilitate the land as part of the Nature Recovery Area. The land is currently agricultural land and is the subject of an outline planning application for a residential development scheme. It is also divorced from the wider designation by the A6, which is a significant barrier. The allocation of my client's land under Policy ENV 10 is not justified and serves no purpose. In respect of the Basic Conditions Statement we do not consider that the Neighbourhood Plan has met the basic conditions. The allocation of my clients land does not contribute to the achievement of sustainable development and the allocation would prevent development taking place on a parcel of land that is considered available and suitable for development. The Neighbourhood Plan should be amended so that my clients land is removed from Policy ENV 10. This would include amending Figure 16 as shown below, so that the land outlined red is removed from the 'Nature Recovery Area'.	



We would be grateful if you could confirm receipt of this letter.

