



For and on behalf of
Lagan Homes Ltd

Harborough Local Plan Regulation 19 Consultation Response

Land off Crowfoot Way

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1.0 INTRODUCTION

- 1.1 Harborough District Council is currently undertaking a Regulation 19 consultation on their emerging Local Plan, which opened on 10th March and will run until 9am 6th May 2025. The Sustainability Appraisal also forms part of the evidence base for this consultation.
- 1.2 These representations are submitted by DLP Planning Ltd on behalf of our client, Lagan Homes Ltd, in response to the Harborough District Council Regulation 19 Consultation. The representations relate to the promotion of Land off Crowfoot Way.

Figure 1: Approximate Location of site



- 1.3 This site has previously been promoted in the Regulation 18 consultation and Call for Sites. It has also been assessed in the Sustainability Appraisal, which will be referenced further in these representations. We have held regular, separate liaison meetings with Broughton Astley Parish Council to engage with them on the emerging proposals for the site, as well as promoting the site through the Neighbourhood Plan for Broughton Astley, where it was received favourably and indicated as a potential allocation option.
- 1.4 The National Planning Policy Framework (NPPF) provides the framework within which local plans should be created, local plans should align with the NPPF's principles and priorities, which include seeking to significantly boost the supply of housing.
- 1.5 The most recently published version of the NPPF was issued in December 2024 ('NPPF2024') as part of the current Labour Government's agenda for planning reform and providing for growth. However, for Local Plans reaching the submission version Regulation 19 before 12 March 2025 the current NPPF2024 includes transitional arrangements in Paragraph 234. Under Paragraph 234(a) this provides for Plans to be Examined under policies of previous versions of the NPPF but for this to be accepted the local housing need

must be at least 80% of local housing need calculated using the Government's revised Standard Method also introduced in December 2024. This is discussed later in this representation.

- 1.6 With this transitional agreement the council is proposing that the Local plan is examined under the December 2023 NPPF. All NPPF paragraph references therefore relate to this version, unless stated. Should this be the case the Paragraph 35 of the 2023 NPPF (36, 2024 NPPF) notes:

“35. Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs¹⁹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”*

- 1.7 For each comment we have highlighted the soundness test and any legal compliance requirements that relevant proposed policies, supporting text or evidence base (including Sustainability Appraisal) contravene along with justification for these comments and suggested Modifications, where relevant.

- 1.8 In terms of these representations these provide comments on the following:

- Section 2: Policy DS01 – Delivering Homes
- Section 3: Policy AP01 – Development in Settlements
- Section 4: Allocation BA1
- Section 5: Housing Trajectory
- Section 6: Policy DM05 - Green and Blue Infrastructure and Open Space

2.0 POLICY DS01 – DELIVERING HOMES

- 2.1 On behalf of our client Lagan Homes these representations Object to the content of Policy DS01 as the Local Housing Need fails to meet criterion a) of paragraph 234 of the 2024 NPPF. this is because the draft housing requirement does not meet at least 80% of local housing need and therefore the Local Housing Need **is not positively prepared nor consistent with national policy.**
- 2.2 The housing requirement for Harborough District is clearly defined—with an annual need of 657 homes between 2020 and 2036 (reducing to 534 thereafter) and a total target of 13,182 dwellings—yet concerns remain regarding the scale and mix of development allocated within large villages such as Broughton Astley.
- 2.3 While the classification of Broughton Astley as a large village is fair, it is unclear why the option for concentrating development within Market Towns has been chosen, given that these account for 6,596 dwellings in the plan period—the largest portion of development. Both Market Towns are distributed as distinct centres within the district and, in many cases, are situated further from Leicester than some large villages. For instance, Lutterworth is approximately 15 miles east of Leicester and Market Harborough about 18 miles south, whereas Broughton Astley is only around 10 miles away. This proximity is particularly relevant considering the commitment to assist in meeting Leicester’s housing needs.
- 2.4 It is challenging to meet the overall housing need when development is concentrated in just a few locations. The allocation of 475 dwellings in Broughton Astley represents a large-scale development that may not be as sustainable as smaller, more flexible sites ensuring achievement of an increased sustainable contribution towards overall housing needs earlier in the Plan Period. Large-scale sites often experience longer lead-in times and slower build-out rates, which can delay housing delivery and reduce the benefits of incremental, phased development. In contrast, smaller sites tend to be more adaptable to local conditions, supporting quicker delivery and providing opportunities for local SMEs such as Lagan Homes to participate in construction. This not only enhances competitive tendering but also generates more local economic benefits, while incremental delivery allows for more responsive adjustments to local infrastructure and service demands.
- 2.5 It also cannot seriously be stated that the strategy’s provision for housing adjacent to the Leicester Urban Area is a direct response to providing for unmet needs or effective in avoiding an over-reliance on large strategic sites with risks to delayed delivery. For example, according to the housing trajectory within the Submission version Plan at least 1,150 of the 2,950 dwellings allocated adjacent the Urban Area through proposed Policy DS01 are forecast to be delivered after the end of the proposed 123dpa contribution to unmet needs from 2020 to 2036 (1,968 dwellings). This is without allowing for delays to the delivery of proposed sites S1 or OA1.
- 2.6 The Urban Area component of the spatial strategy comprises locations addressing a range of cross-boundary strategic priorities not solely relate to Leicester’s unmet needs – for example the joint work with Oadby & Wigston relating to proposals for Land South of Gartree Road. The reality is also the adopted Local Plan has previously proposed substantially delayed growth in locations adjacent to the Leicester Urban Area – to the extent that adopted Policy SC1 Scraftoft North Strategic Development Area is required to be superseded and replaced by the submission version Plan. Even the faster delivery of these locations would therefore not constitute a complete or effective solution to enabling the strategy to contribute towards needs from a wider range of locations.

- 2.7 The proposed housing trajectory seeks to accommodate the proposed contribution towards unmet needs in large part through accounting for ‘oversupply’ in the plan period between 2020 and 2024 when completions exceeded 750 dwellings per annum. This not a sound approach, and ignores delays to the implementation of the existing Local Plan and PPG 2a-015 applicable to preparation of this Local Plan that previous build rates may provide one reason the housing need exceeds the result of the previous Standard Method.
- 2.8 The Submission version Plan therefore compounds the current challenges to delivery and boosting supply to meet pent-up demand across Leicestershire and the wider housing market by proposing a reduced housing requirement and failing to support sustaining recent build rates in the early years of the Plan Period upon adoption. This is not illustrative of an appropriate strategy or providing for a range of choice of sites but more importantly is a feature of a Plan that fails to accord with the transitional arrangements in Paragraph 234(b) of the NPPF2024. While the trajectory from 2024-2031 is therefore dependent on delivery from the Market Towns and existing commitments (given the deferred delivery of large strategic sites) this means annual delivery is not forecast to exceed the proposed requirement of 657dpa applicable in these years until 2031/32. The trajectory proposes that the cumulative requirement 2020-2031 of 7,227 dwellings (657 x 11) will be met by forecast supply (7,773 units) but the difference (546 dwellings) is only a function of 1,102 units ‘oversupply’ against the same requirement measured 2020-2024
- 2.9 To further illustrate this the higher delivery in Harborough between 2020 and 2024 is not unique to the district. However, within the wider housing market context this is relative not only to delays in the delivery of existing Plans but also aggregate average housing delivery substantially below the sum of either the current or previous Standard Method particularly due to undersupply in Charnwood and Leicester itself. This is shown in Table 1.

Table 1: Comparison of Standard Method outcomes and average delivery (2020 - 2024) in Leicestershire

Local Authority Name	Previous Method	2025 SM Outcome	2025 vs 2023	Average Delivery 2020 - 2024 (LT122)
Blaby	329	534	205	323
Charnwood	1,115	982	-133	782
Harborough	510	723	213	915
Hinckley and Bosworth	432	659	227	491
Melton	192	363	171	353
Leicester	2,435	1,581	-854	911
North West Leicestershire	357	610	253	734
Oadby and Wigston	198	384	187	246
Leicestershire	5,568	5,836	268	4,755

- 2.10 Under the new Standard Method, the annual housing need increases to 723 dwellings—amounting to 15,183 dwellings for the plan period. With a pipeline of 8,417 dwellings already built, committed, or allocated since 2020, there remains a shortfall of 6,766 dwellings. The

Council's provision for a total of 14,839 dwellings incorporates an additional 123 dwellings per annum (for 2020 to 2036) to help address Leicester's unmet need. Although the plan has reached Regulation 19 before 12 March 2025 and is not immediately required to fully comply with this adjustment, it must still meet at least 80% of local housing need—equating to 578 dwellings per annum, as stipulated in paragraph 234(a) of the NPPF.

- 2.11 Without the supplementary allocation intended to address Leicester's unmet need, the deliverability threshold of 578 dwellings per annum would not be met. It is fundamentally unsound to ignore the purpose of the unmet need contribution in concluding that an annual requirement of 657dpa (or 628dpa averaged over 21 years) satisfies the transitional arrangements. It is also fundamentally unsound to rely on contributions to unmet need prior to adoption as contributing towards the transitional arrangements, when these were not being met in full and had been calculated under previous Government policy applicable to the SoCG. Finally, it is unsound to suggest that total provision in the Plan (14,839 or 707dpa (or 613dpa excluding 1,968 dwellings towards unmet need) satisfies the transitional arrangement – this is due to the significant deferral of delivery on strategic sites.
- 2.12 The current allocation strategy—particularly in large villages such as Broughton Astley—raises significant concerns regarding planning positively in respect of the transitional arrangements. A development strategy that favours smaller, deliverable sites would better ensure that the 80% deliverability threshold is met and would offer broader economic benefits through increased SME engagement. It is therefore essential that the Local Plan reassesses the scale and mix of site allocations to ensure a timely and efficient contribution to meeting local housing need.
- 2.13 The revised standard method has a 2023 base-date. Using this to assess the transitional arrangements including unmet needs contributions would equate to a requirement of 578 + 123 dwellings per annum – or 9,113 dwellings 2023-2036 / 12,003 dwellings 2023-2041. Provision should be made for this full total, excluding oversupply and with a 10% buffer for flexibility. This would necessitate **an increase of at least 1,329 dwellings** against the 11,879 dwellings shown in the trajectory for the same period (13,203 – 11,879).

Broughton Astley Housing requirement

- 2.14 While Policy DS01 sets out the overall housing requirement for Harborough District and provides a broad distribution of growth across different settlement tiers, it does not clearly define a housing requirement for individual neighbourhood areas, including Broughton Astley. The policy references that 1,500 dwellings are to be delivered in large villages, of which 475 are to be accommodated in Broughton Astley. However, it does not explain whether this figure constitutes the housing requirement for the settlement or how it has been derived.
- 2.15 This approach is inconsistent with paragraph 67 of the 2023 NPPF (69, 2024 NPPF), which requires strategic policies to establish a housing requirement figure for designated neighbourhood areas, reflecting both the district's overall strategy and any unmet needs. The absence of an explicit, justified requirement for Broughton Astley means it is not possible to determine whether the level of growth proposed is appropriate or supported by evidence.
- 2.16 Even if 475 dwellings are assumed to represent the settlement's housing requirement, the decision to allocate this entirely on a single large site (BA1) raises additional concerns. Paragraph 70 of the 2023 NPPF (73, 2024 NPPF) emphasises the importance of planning for a mix of site sizes, including the requirement that at least 10% of the total housing requirement should be accommodated on sites no larger than one hectare. The reliance on

a single large allocation does not align with this national expectation, nor does it provide resilience in the event that delivery is delayed or viability concerns arise.

- 2.17 For the purposes of NPPF2023 paragraph 67 the Plan does include smaller allocations at lower order settlements. It is wholly unsound, within the context of the role of the spatial strategy to provide flexibility and choice outside of the Urban Area and Market Towns, to import the same challenges to delivery at these locations into Broughton Astley through interpretation of the requirement for the Neighbourhood Area as the allocation of a single strategic site. This further undermines the ability of the settlement to reinforce the sustainability of links to Leicester. The Site Selection methodology clearly recognises Broughton Astley as the district's third largest settlement that has benefited from recent growth.
- 2.18 Whilst the Plan may be considered sound in terms of the principles of distributing growth to Large Villages this is not the case for Broughton Astley as a designated Neighbourhood Plan area. The Plan does not consider the possibility that the single large allocation at BA1 may not come forward or may deliver more slowly than anticipated. This places undue pressure on the Neighbourhood Plan to identify and allocate additional smaller sites to make up any shortfall in delivery. In the absence of a clearly defined housing requirement for Broughton Astley, this would also require the Neighbourhood Plan to determine its own housing figure—a responsibility that should rest with the strategic authority therefore the plan is **not consistent with national policy** specifically paragraph 67 and 70 of the 2023 NPPF

Proposed Amendments

- 2.19 To ensure DS01 is positively prepared and consistent with national policy, the Council should:
- **Increase the annual requirement:** Raise the Plan's housing requirement to **at least 701 dwellings per annum**, reflecting the revised Standard Method figure plus the apportionment of Leicester's unmet need, so that the 80% transitional test is met and the Plan avoids immediate review under NPPF Annex 1.
 - **Make provision for 13,203 dwellings 2023-2041** inclusive of a 10% buffer for flexibility – indicating a need for 1,329 dwellings above those currently identified in the housing trajectory.
 - **Set neighbourhood requirements:** For each designated Neighbourhood Plan area (e.g. Broughton Astley), publish a clear, evidenced housing requirement figure in the policy text or accompanying schedules.
 - **Small-site quota:** Require a minimum of 10% of each neighbourhood requirement to be delivered on sites of 1 hectare or less, in line with paragraph 70, to diversify supply and support SME builders.
 - **Responsive allocations:** Commit to review and update site allocations whenever a new requirement figure is adopted, in order to maintain a five-year supply and reflect the latest needs.
 - **Detailed phasing:** Revise Appendix 5 (Housing Trajectory) to include a discrete phasing table for Broughton Astley (Years 1–5, 6–10, 11–15), showing how small, medium and strategic sites will contribute to delivery.

3.0 POLICY AP01 – DEVELOPMENT IN SETTLEMENTS

- 3.1 On behalf of our client Lagan Homes these representations propose that Policy AP01 be amended to ensure its soundness. Policy AP01, as currently drafted, raises several concerns, particularly regarding the lack of clarity surrounding "settlement limits", definition of built up areas and the restrictive approach to development adjoining aforementioned existing built-up areas. The policy states that development will be permitted within "settlement limits where these are established in Neighbourhood Plans," but it fails to define precisely what is meant by "settlement limits." This ambiguity creates uncertainty in decision-making and risks unnecessarily constraining development in sustainable locations. Therefore, the language associated with this policy is **not effective** and **not justified**.
- 3.2 In the case of Broughton Astley, the Neighbourhood Plan was adopted in 2014, meaning that it is now over 11 years old. Since its adoption, housing requirements have significantly increased, and it is questionable whether the boundaries set in 2014 remain appropriate given current housing needs and policy requirements.
- 3.3 Paragraph 67 of the 2023 NPPF (69, 2024 NPPF) requires strategic policies to establish a housing requirement figure for designated neighbourhood areas that reflects both identified need and any unmet need from adjoining areas. The emerging Local Plan fails to satisfy that test for Broughton Astley, merely allocating 475 dwellings at BA1 without explaining how that figure meets the settlement's requirement or the evidence underpinning it.
- 3.4 Paragraph 33 of the 2023 NPPF (34, 2024 NPPF) highlights that policies should be reviewed regularly to reflect changing circumstances. Given the substantial increase in housing need since the adoption of the Broughton Astley Neighbourhood Plan, it is essential that settlement boundaries be reconsidered rather than arbitrarily restricting development based on outdated policy.
- 3.5 Furthermore, the Neighbourhood Plan defines a plan boundary but does not establish a settlement boundary. This raises questions about how Policy AP01 should be applied in areas where Neighbourhood Plans do not explicitly set out settlement limits, creating inconsistencies and uncertainty over development opportunities.
- 3.6 This restrictive approach contradicts national planning policy. Paragraph 16(d) of the NPPF requires policies to be *"clearly written and unambiguous, so it is evident how a decision maker should react to development proposals"*. The undefined nature of "settlement limits" in Policy AP01 does not meet this requirement.
- 3.7 The land off Crowfoot Way provides a clear example of why a more flexible approach to settlement boundaries is necessary together with extending the policy support in relation to support for development within and adjacent to built-up areas. The site is located on the southern boundary of Broughton Astley and is surrounded on three sides by existing development. To the west and north, there is established residential development, while to the east, an unused railway line provides a natural boundary that prevents further expansion. Only to the south does the site adjoin agricultural land, but its development would constitute logical infill, complementing the settlement pattern and retaining existing landscape and boundary features on this edge rather than extending development into open countryside. The railway line ensures that development would not lead to unrestricted sprawl and provides a clear, defensible boundary.
- 3.8 Paragraph 123 of the NPPF (124, 2024 NPPF) states that planning policies should *"promote an effective use of land in meeting the need for homes and other uses."* The land off Crowfoot

Way represents an underutilised parcel within an existing settlement that is well-suited for sustainable development. Its allocation would contribute to meeting housing needs without significantly impacting the character of the surrounding area.

- 3.9 Paragraph 124d of the NPPF (125d, 2024 NPPF) also encourages the "development of under-utilised land" where land supply is constrained, and where available sites could be used more effectively. Land off Crowfoot Way is precisely such an under-utilised parcel—vacant former construction land—not identified as protected open space in the draft Policies Map or Open Spaces Strategy. Its allocation would therefore exemplify the efficient and sustainable use of land.
- 3.10 This is a point expressly recognised in Appendix 4 ('Detailed Assessment') of the site in the Council's Site Selection Methodology which correctly defines the land as "*part of a construction compound related to recently completed residential development*". There are no technical reasons provided to prevent future development of the site and the subsequent conclusion of 'delivery uncertainty' is wholly unsound both in terms of not selecting the site as an allocation option or to confirm its suitability in relation to the existing built settlement and Policy AP01.
- 3.11 The site adjoins existing housing on the north and west sides and is bounded to the east by a disused railway line, creating a clear, defensible boundary. Existing hedgerows along that boundary and elsewhere on the site could be retained and reinforced to integrate new development into the landscape, safeguard biodiversity, and prevent urban sprawl. Allocating this site for around 30 dwellings (with accompanying informal green space) would complement the surrounding built form and contribute positively to the settlement pattern.
- 3.12 Policy AP01, as currently worded, fails to provide a sufficiently flexible framework for managing development in sustainable locations. It relies too heavily on Neighbourhood Plans, some of which are significantly outdated and do not contain the necessary settlement limits to guide decision-making. This approach risks restricting the supply of housing and undermines the objective of meeting local and national housing needs particularly where the Submission version Plan does not provide new housing requirement figures for the Broughton Astley settlement.
- 3.13 A more appropriate approach would be to revise Policy AP01 to define settlement limits clearly and introduce greater flexibility for sustainable development adjoining settlements where a defensible boundary, such as the unused railway line at Crowfoot Way, exists. This would align with national policy and ensure that housing delivery is not constrained by outdated or inconsistently applied local policies.

Proposed amends:

- 3.14 To make AP01 effective and justified, the Council should:
- **Define "Settlement Limits":** Add a formal definition in the glossary and inset map for "settlement limits," identifying where they derive from (e.g. Neighbourhood Plan boundaries) so that areas like Broughton Astley are not left ambiguous.
 - **Logical infill criterion:** Insert a new clause permitting "**logical infill adjoining defensible boundaries**" (for example Land off Crowfoot Way, bounded by the disused railway line), ensuring infill sites are acceptable where they complement existing development and support SME delivery, consistent with paragraph 70.
 - **Insert a new criterion within Part 3 of the policy:** to define under-utilised land including that forming part of existing planning permissions or recently committed



development as an additional exception to development on land adjoining built-up areas.

- **Expand Criteria 3(f):** to include all circumstances where a five year supply cannot be demonstrated
- **Boundary review trigger:** Where Neighbourhood Plan–defined limits are older than five years, automatically trigger a review of those limits through the Local Plan update, to ensure they accommodate current housing requirements.
- **Map and policy alignment:** Amend AP01 to cross-reference the revised DS01 neighbourhood requirements and small-site quota, ensuring the spatial strategy for settlement growth aligns with the housing requirement for each designated area.

4.0 ALLOCATION BA1

- 4.1 This allocation of BA1 should be considered in the context of soundness concerns with the wider strategy for Broughton Astley and the sustainability appraisal should be reviewed as these currently indicate the conclusion that this allocation is **not justified**.
- 4.2 In Broughton Astley, only one site (BA1) is proposed for allocation, delivering 475 dwellings. The Sustainability Appraisal scores for this site are almost identical to those for Land off Crowfoot Way (14/10175), with the exception of SA3 (Efficient Use of Resources, Including Soils) and SA6 (Safeguard and Improve Health, Safety, and Wellbeing), where BA1 scored marginally higher.
- 4.3 This allocation does not currently benefit from planning permission. This further raises concerns in regard to Paragraph 69 of the 2023 NPPF (72, 2024 NPPF) expects plans to “identify a sufficient supply and mix of sites...including specific, deliverable sites for years 1–5 and developable sites or broad locations for years 6–10 (and, where possible, 11–15)”. Relying on a single, large strategic allocation at BA1 provides no small sites or broad locations, leaving the first five-year supply in Broughton Astley as at risk of significant delay and failing to support the Plan on adoption.
- 4.4 The trajectory in Appendix 5 shows no completions from BA1 until 2030/31, leaving Broughton Astley without any scheduled housing delivery in Years 1–5. To address this, the Council should allocate one or more small, immediately deliverable sites—such as Land off Crowfoot Way—to ensure the neighbourhood area contributes to the early years of the trajectory.
- 4.5 The justification for BA1’s allocation, as noted in the Sustainability Appraisal, states:
“The site is considered to meet the criteria for potential site allocation and is in line with the Local Plan objectives and spatial strategy. The site is in keeping with the character and landscape setting of the existing settlement and would have a low impact on the edge of the settlement and is considered an appropriate location for development. The site is adjacent to the recreation space and primary school and would enable land to be provided to expand the school.”
- 4.6 In contrast, the assessment of Land off Crowfoot Way simply states: *“Delivery uncertainty”*, with no further justification to not take the land forward for allocation. Given that the site is in single ownership, adjoins an existing residential development, and could commence development immediately following planning approval, it is unclear why such a conclusion has been reached. Under Annex 2 of the NPPF, the site would be classified as 'deliverable' upon securing planning permission.
- 4.7 We note that Broughton Astley Parish Council has registered an objection to the draft Local Plan, citing concerns that they were not meaningfully consulted and that their preferred alternative sites were not fully considered. During the development of the plan, we have sought to engage with the Parish Council and have submitted the site through a formal pre-application in January 2025 under Harborough District Council’s pre-app service. We await feedback on scheme layout, access and landscaping. A public consultation for this proposal ran from April 8th 2025 until April 22nd 2025 during which all comments have been duly recorded and will be taken into consideration. Therefore, an application submission for this site is imminent.
- 4.8 The assertion that BA1 would have a *“low impact on the edge of the settlement”* is also

questionable. A development of 475 dwellings represents a significant expansion of Broughton Astley, with the allocation nearly matching the scale of the existing north-western part of the settlement. In contrast, Land off Crowfoot Way is a smaller, more proportionate extension that would integrate more seamlessly with the existing built form.

SA3 – Efficient Use of Resources, Including Soils

- 4.9 BA1 is scored as having a significant negative effect/uncertain impact under SA3, likely due to its current agricultural use. While this is a reasonable assessment, it is important to recognise that all greenfield development impacts land resources.
- 4.10 Land off Crowfoot Way, however, is assessed even more negatively, with a significant negative effect/uncertain or minor negative effect likely. This is difficult to justify, as the site is currently undeveloped and largely underutilised. Unlike BA1, it is not in active agricultural use but rather a vacant parcel of land on the edge of an existing housing estate. Given that the NPPF encourages the use of underutilised land, it is unclear why BA1 is considered preferable in this regard..

SA6 – Safeguard and Improve Health, Safety, and Wellbeing

- 4.11 The Sustainability Appraisal assigns a significant positive effect to BA1 under SA6, while Land off Crowfoot Way is rated as having only a minor positive effect. The justification appears to rest on BA1's provision of land for school expansion.
- 4.12 While additional school land can be beneficial, it is important to consider the wider impacts of the allocation. The BA1 allocation of 475 dwellings is likely to place substantial additional demand on local infrastructure, notably Orchard Church of England Primary School, which currently has a capacity of 210 students with 192 enrolled. Even with the provision of extra land, it remains uncertain how the school would accommodate the increased demand.
- 4.13 There is also uncertainty regarding the actual provision of this additional land. It is not clear whether this will be secured through a Section 106 agreement, as no planning application is currently in place on the site. Given the current climate, with rising building costs and the potential for planning obligations to be renegotiated (PPG Reference ID: 23b-020-20190315), there is a risk that viability concerns could be raised, potentially resulting in the removal of this obligation.
- 4.14 In contrast, Land off Crowfoot Way would deliver a much smaller number of homes, generating a lower impact on local services, and contributing proportionately to local infrastructure needs. Given that both sites would provide much-needed housing for Broughton Astley, the reasoning for BA1's higher SA6 score requires further clarification.
- 4.15 Given that both sites perform almost identically across the other Sustainability Appraisal objectives, Land off Crowfoot Way should be considered equally sustainable for development. The decision to allocate a large, strategic site in a more rural setting, while dismissing a smaller, deliverable site, raises questions about the rationale behind site selection.
- 4.16 Large strategic allocations often experience longer lead-in times and slower build-out rates, which could delay housing delivery. According to Lichfields' "Start to Finish" (3rd Edition) report:
- A site the size of BA1 (475 dwellings) typically takes 2.8 years in the planning system (from application validation to detailed permission being first granted) before detailed permission first permitting development is achieved.

- Once permission is granted, it then takes a further 3.2 years to first delivery, meaning a total of 6 years from validation to first delivery.
- Large sites tend to deliver at a slower annual rate, with an average build-out rate of 44 - 49 dwellings per annum, implying that full delivery of 475 dwellings would take approximately 9.7–10.8 years at these rates.

4.17 In contrast, Land off Crowfoot Way is proposed for 30 dwellings with approximately 2,000 sqm of informal green space, making it far more deliverable in the short term. Smaller sites such as this can make an immediate contribution to the housing trajectory and five-year land supply, a key requirement of national policy.

4.18 Given that BA1 and Land off Crowfoot Way scored almost identically in the Sustainability Appraisal, it is unclear why BA1 has been allocated while Land off Crowfoot Way has been dismissed under "Delivery Uncertainty."

4.19 Land off Crowfoot Way offers:

- A more proportionate extension to the existing settlement.
- A deliverable site with fewer infrastructure constraints.
- A quicker contribution to housing supply.
- Policy compliant levels of affordable housing and a sustainable housing mix, complementing and increasing variety in the mix and tenure of available stock and diversifying provision relative to the existing Crowfoot Way development.
- A more efficient use of underutilised land than BA1.

4.20 It is therefore requested that Land off Crowfoot Way be reconsidered for allocation within the Local Plan, ensuring a balanced and justified site selection process.

4.21 According to the 2024 SHELAA Update, Land off Crowfoot Way (Site ref: 24/10175) is assessed as suitable and available, with no red constraints identified. The site is considered capable of housing approximately 32 dwellings at a density of 30 dph, which is consistent with its role as a small infill development. Its current status as an underutilised parcel—currently a construction site and grassland—and its adjacency to established residential areas underscore its potential for timely and efficient development. This contrasts with BA1, where the larger scale of development may result in longer lead-in times and slower build-out rates.

4.22 The site's location reinforces its effective use of land. Situated on the southern boundary of Broughton Astley, it is bounded by existing residential development to the west and north, while an unused railway line to the east serves as a natural buffer that restricts further sprawl. To the south, adjacent agricultural land further delineates its boundaries. This context demonstrates that the development of Land off Crowfoot Way would constitute logical infill—complementing the existing built fabric without overwhelming local infrastructure. In light of these factors, the "delivery uncertainty" label appears unwarranted, and the site should be reconsidered as a deliverable contribution to local housing supply.

Proposed amendments

4.23 The Council should:

- **Reconsider Sole Strategic Allocation:** As the only site for Broughton Astley, BA1 carries undue delivery risk. On reviewing the settlement's requirement, the Council should identify and allocate additional, smaller sites to diversify supply and guard against under-performance of a single strategic site.

- **Re-appraise Sustainability Scoring:** Commission a focused addendum to the Sustainability Appraisal for BA1, with transparent justification for its SA3 (land use) and SA6 (health & wellbeing) scores, given the site's scale and context.
- **Require a Delivery Statement:** Accompany BA1 (and all large allocations) with a published Delivery Statement or Memorandum of Understanding setting out:
 - Phasing and annual build-out rates
 - SME engagement strategies
 - Responsibilities and milestones.This will increase accountability and refine the housing trajectory in Appendix 6.
- **Identify Complementary Small-Site Reserves:** Allocate one or more small infill sites (≤ 1 ha) alongside BA1 to future-proof delivery. If viability or timing issues delay BA1, these reserves will ensure the local requirement can still be met.
- **Publish an Infrastructure Delivery Schedule:** As BA1 currently lacks planning permission or obligations, the Council must prepare an IDS detailing critical S106 requirements and trigger points for:
 - School expansion land
 - Off-site green and blue infrastructure
 - Transport improvements

5.0 HOUSING TRAJECTORY

- 5.1 The housing trajectory set out in the Local Plan makes several assumptions regarding the timing and scale of housing delivery that require further scrutiny. The projected build-out rates for larger strategic sites appear to be overestimated when compared to industry benchmarks, and there is a lack of local evidence to justify these figures. Additionally, several site allocations are expected to commence significantly earlier than indicated in the SHELAA 2024 assessment, raising concerns about their actual deliverability within the stated timeframe. The overall trajectory also anticipates a sharp increase in housing completions within a relatively short period, which does not appear to align with past delivery trends or the Council's stated spatial strategy. These issues suggest that the trajectory may not provide a realistic assessment of housing delivery over the plan period. Overall the trajectory lacks proportionate evidence and is therefore **not justified**

Build-Out Rate

- 5.2 The Council's trajectory assumes higher build-out rates for larger sites than are indicated by industry benchmarks. For instance, for S1 – Land between Scraftoft & Bushby (a site expected to deliver around 950 dwellings) and OA1 – Land South of Gartree Road & East of Oadby (with a capacity of approximately 1,200 dwellings), the trajectory projects annual completions of 100 and 150 dwellings, respectively.
- 5.3 However, according to Lichfields' "Start to Finish" (3rd Edition) data, the mean and median build-out rates for sites in these size categories are substantially lower. No local evidence has been provided to substantiate these elevated completion rates, raising questions about the feasibility of achieving such targets under current market and local conditions. The data are summarised below:

Site Size (dwellings)	Mean build-out rate (dpa) (3rd Edition)	Median build-out rate (dpa) (3rd Edition)
50–99	20	18
100–499	49	44
500–999	67	68
1,000–1,499	90	87
1,500–1,999	110	104
2,000+	150	138

- 5.4 For sites in the 500–999 range, the expected annual build-out rate is approximately 67–68 dwellings, and for those in the 1,000–1,499 range it is around 90–87 dwellings. This clearly indicates that the Council's projections—of 100 and 150 dwellings per annum for S1 and OA1 respectively—are overly optimistic. When applied over the build-out period, these inflated rates amount to an overestimation of roughly 202 dwellings in S1 and 480 dwellings in OA1.

Lead in time

- 5.5 It does however appear that the council have considered the lead in time of development Lichfield's publish a median lead in time based on validation to first completion.

Site Size (dwellings)	Median Planning to approval period (Years)	Median Planning to first delivery period (Years)	Median validation to first delivery (Years)
50–99	1.5	2.3	3.8
100–499	2.8	3.2	6
500–999	3.4	1.5	4.9
1,000–1,499	4.9	1.3	6.2
1,500–1,999	5	1.6	6.6
2,000+	5.1	1.6	6.7

- 5.6 BA1 (475 dwellings) sits within the 100–499 range, for which a six-year median validation-to-first-delivery period is recorded. Yet the trajectory in Appendix 5 anticipates first completions in 2030/31, just five years from Regulation 19. No planning application has yet been submitted on BA1; on the Lichfields evidence, first homes would not realistically appear before 2031/32—meaning the Plan’s assumption is overly optimistic.
- 5.7 S2 (175 dwellings at Land East of Beeby Road, Scraftoft) is forecast to deliver from 2028/29, only three years after Regulation 19, despite also lacking any approval. Although a screening request for 200 dwellings was lodged on 27 March 2025 (ref 25/00430/SCR), no full application exists. Lichfields’ six-year benchmark would suggest first build-out no earlier than 2031/32.
- 5.8 This discrepancy demonstrates that the trajectory is not justified: it fails to reflect established lead-in evidence and assumes unrealistically rapid delivery. The absence of local viability, infrastructure or phasing evidence for step-changes in delivery further undermines the Plan’s effectiveness

Commencement of Development

- 5.9 Eight allocations are projected to commence development in Year 4 —despite the SHELAA 2024 assessment suggesting later commencement. These include:
- S2: Land East of Beeby Road (Scraftoft)
 - MH1: Land east of Leicester Road and south of Grand Union Canal (Market Harborough)
 - F1: Land north of Kilby Road and west of Longgrey (Fleckney)
 - B2: Billesdon Depot, south of Gaulby Road (Billesdon)
 - GB2: Land off Dingley Road and Nether Green (Great Bowden)
 - HH1: Land north of Uppingham Road (Houghton on the Hill)
 - U1: Land south of Ashby Road (Ullesthorpe)
 - U2: Land north of Ashby Road (Ullesthorpe)
- 5.10 This early commencement appears overly optimistic. Under NPPF Annex 2, a site is only deemed developable if it is in a suitable location with a reasonable prospect of availability and viable development. The SHELAA 2024 assessment indicates that, with the exception of S2 - which was considered deliverable within 16+ years - all of these sites were assessed as deliverable only within a 6-10 year timeframe. It is unclear what has changed since the SHELAA update that would justify all these sites being considered deliverable within just four years.
- 5.11 It is, however, apparent that the trajectory is reliant upon oversupply from the period 2020-2024 that is materially reduced by 2028/29. Moreover, under the provisions of national policy in the NPPF2024, the five-year requirement will be subject to a 20% buffer from July 2026. The Council’s sleight of hand in exaggerating delivery assumptions in future years is

therefore unsurprising but also wholly without clear evidence or **justification** and is thus unsound and **not consistent with national policy**.

Supply

- 5.12 The housing trajectory shows peak delivery occurring between 2028/29 and 2038/39. Recent completions averaged 988 homes per annum over 2020/21–2022/23, but the trajectory forecasts a significant uplift thereafter.
- 5.13 Specifically, annual completions rise from around 485 dpa in 2025/26 to 868 dpa by 2028/29. This increase relies on new allocations alongside an assumed 45 dpa from windfalls and 25 dpa from small-village sites.
- 5.14 No local evidence is provided to support these elevated rates, nor to explain how additional windfall and small-site contributions will materialise given the Council’s focus on market-town growth. In the absence of such evidence, the projected trajectory’s robustness is uncertain.

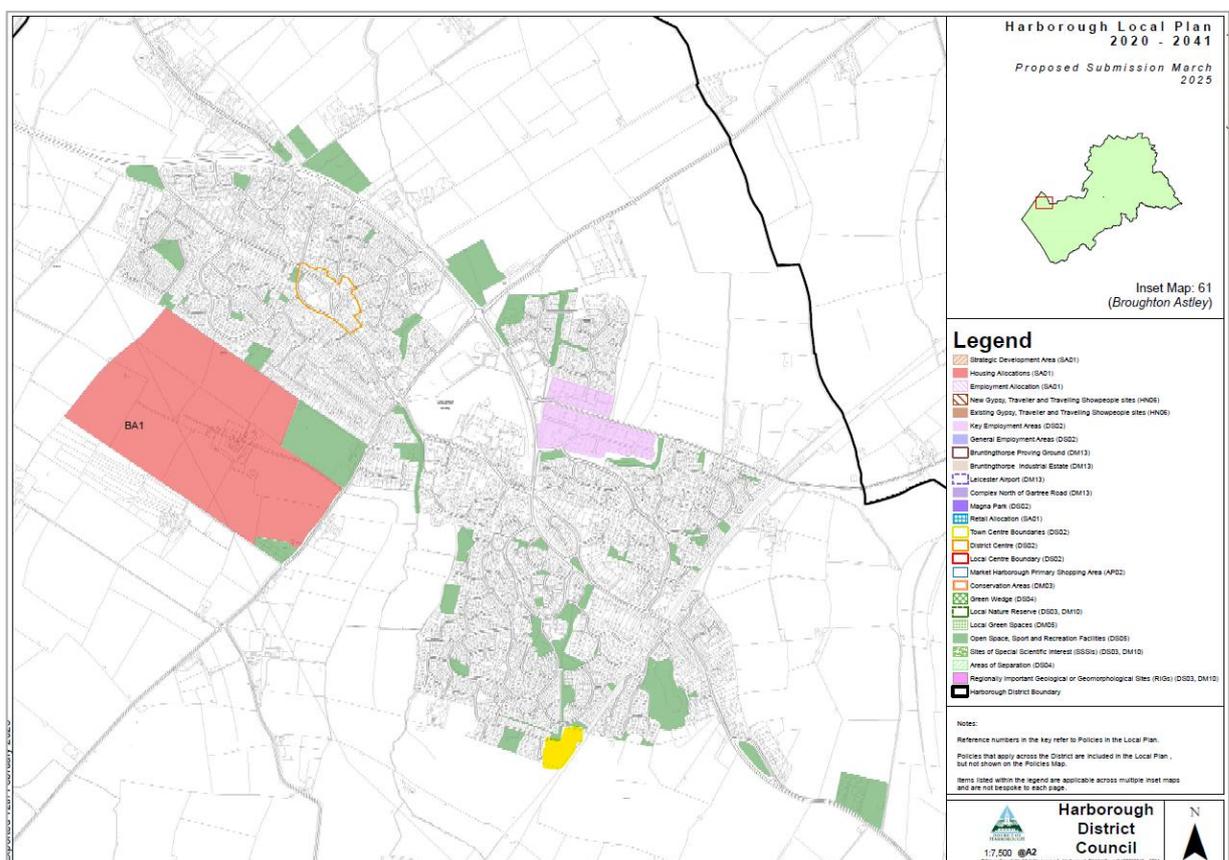
Suggested Revision

- 5.15 The Council should engage directly with each site promoter to obtain site-specific Delivery Statements, including realistic phasing, anticipated planning lead-in times, and build-out rates. These statements should inform the trajectory
- 5.16 The Council should draw on local evidence—such as promoter delivery statements, past performance of comparable schemes and infrastructure readiness—to justify lead-in times. According to Lichfields, both BA1 (475 dwellings) and S2 (175 dwellings) would not realistically deliver first homes until 2031/32, even if planning applications were submitted immediately. The trajectory must be revised to reflect these realistic dates and, where early provision is required, alternative small, immediately deliverable sites (for example Land off Crowfoot Way) should be identified to secure the five-year supply.

6.0 POLICY DM05 - GREEN AND BLUE INFRASTRUCTURE AND OPEN SPACE

6.1 We support the general objectives of Policy DM05 and its commitment to delivering high-quality green and blue infrastructure. In Broughton Astley, open space provision is clearly illustrated on the Policies Map (Figure 2 below). The site subject to this representation is shown indicatively in yellow. It does not fall within any of the areas identified as designated Open Space, Sport or Recreation Facilities and has not been surveyed or identified as contributing to existing open space provision within the adopted evidence base. The site would, however, be able to capitalise on north-south Green Infrastructure links connecting with the site's northern boundary.

Figure 2: Broughton Astley Policy Map



Green areas represent Open Space, Sport and Recreation Facilities, this site is roughly highlighted in Yellow

- 6.2 Policy DM05 provides guidance for developers surrounding the provision for open space and expected contribution for all sites and in particular residential sites of 10 or more.
- 6.3 The Council's most recent Open Space Strategy (2021), which underpins Policy DM05, divides the District into three sub-areas: East, Central and West. Broughton Astley falls within the West Sub-Area.
- 6.4 The 2021 Open Space Strategy identifies that the West Sub-Area, which includes Broughton Astley, currently has an open space provision of 5.49 hectares per 1,000 population. This is projected to reduce to 4.68 hectares per 1,000 by 2036, based on a 16.06% population increase (Table 37, Open Space Strategy). Despite this overall decline, Broughton Astley

and the wider West Sub-Area currently show a surplus in amenity greenspace (+0.07 ha/1,000) and cemeteries and burial grounds (+0.11 ha/1,000), although both are expected to marginally shift into deficit or reduce in surplus by 2036.

6.5 Provision for certain typologies, however, is already below the Council's proposed standards. These include:

- Natural and Semi-Natural Greenspace: currently a deficit of -5.31 ha/1,000, increasing to -5.75 ha/1,000 by 2036;
- Parks and Gardens: -0.49 ha/1,000 (2020), increasing to -0.54 ha/1,000;
- Provision for Children and Young People: -0.10 ha/1,000 currently, worsening to -0.12 ha/1,000.

6.6 Despite these shortfalls in the wider sub-area, Broughton Astley specifically contains a large number of audited amenity greenspace sites assessed as being of "Excellent" or "Very Good" quality seen in the table below

Table 2: Sites in Broughton Astley

Site Name	Typology	Area (Ha)	Quality (%)	Quality Banding	Value (%)	Value Banding
Holbeck Drive	Amenity Greenspace	0.01002	100	Excellent	10	Low
Foxglove Close	Amenity Greenspace	0.09704	97	Excellent	31	Low
Townsend Close	Amenity Greenspace	0.03298	96	Excellent	16	Low
Hall Farm Crescent	Amenity Greenspace	0.02638	96	Excellent	19	Low
Speedwell Drive	Amenity Greenspace	0.17061	96	Excellent	28	Low
Cotton Close	Amenity Greenspace	0.04983	96	Excellent	30	Low
Gorham Rise	Amenity Greenspace	0.10282	96	Excellent	35	Low
Blenheim Crescent	Amenity Greenspace	0.07174	94	Excellent	29	Low
Leicester Road	Amenity Greenspace	0.13391	91	Excellent	24	Low
Falcon Close	Amenity Greenspace	0.09386	91	Excellent	28	Low
Frolesworth Road Cemetery	Cemeteries	0.78799	90	Excellent	28	Low
Devitt Way	Civic Space	0.25647	85	Very Good	47	Low
Memorial Gardens	Parks and Gardens	0.07942	96	Excellent	44	Medium
Byre Crescent Play Area	Children/Young People	0.41674	67	Fair	50	Medium
Cottage Lane Play Area	Children/Young People	0.52291	61	Fair	50	Medium

Source: *Open Spaces Strategy (2021), Appendix D: Audit Results*

6.7 The site referenced in this representation is not designated as open space within the

Council's evidence base or on the Policies Map, nor has it been assessed as part of the Council's open space audits. It is not included in the calculation of existing supply and is not identified as necessary to meet current or future provision standards in the West Sub-Area. Its development would therefore not appear to compromise the application of Policy DM05 in Broughton Astley or the objectives of the Open Space Strategy.

- 6.8 Policy DM05 also makes appropriate provision for off-site contributions towards Open Space requirements, which are supported and should be capable of being applied flexibly dependent on specific circumstances. For example, in addition to the above points the site under reference 24/10175 would also benefit from existing formal Open Space provision on the existing Crowfoot Way development (ref. 18/00433/REM).
- 6.9 Site reference 24/10175 was formerly part of the approved scheme (ref. 18/00433/REM) for 50 dwellings and was shown as undeveloped land on the approved Reserved Matters layout plan. The signed Section 106 agreement for that scheme included this compound land within the open space calculations. As a result, there was an over-provision of natural/semi-natural greenspace under the original permission.
- 6.10 These typologies equate to a total of 1.36ha of open space to be provided on site. The existing central area of open space on the approved built scheme comfortably accommodates the requirements for urban green space, amenity green space, parks and gardens, and children and young people's provision. However, the remaining land on site (the eastern parcel), given its location, quantum, and relationship with the built development, would not function well as semi natural greenspace as a typology and would therefore be better delivered as a contribution towards off site provision in a more coordinated way.
- 6.11 As a result of the above over provision of open space and the significant increase in housing need that Plan must address the site represents a logical location for residential development.
- 6.12 Since the development at Crowfoot Way (ref. 18/00433/REM), the Council has adopted the Open Space Strategy (TEP) informing proposed Policy DM05, which sets out the calculations for public open space across the district. In order to calculate the open space requirements for 80 dwellings in total (50 units built and 30 units now promoted), it is assumed 80 units x 2.3 (average persons per dwelling), which results in a requirement of 1.9 hectares. At paragraph 8.34 of the Strategy, it is stated that there is a surplus cemeteries provision, so this is not included within the requirements. Whilst it also states there is a surplus of amenity green space, this has already been provided for in the central area on the 50-unit scheme. This to a total 1.9hectares for all typologies if the land was considered as a single scheme of 80 dwellings, of which 1.5 hectares would be natural and semi-natural greenspace.
- 6.13 In the spirit of genuine local engagement, we have made the proposed off-site contributions available for discussion with Broughton Astley Parish Council to ensure they align with community priorities.
- 6.14 Given the description of this typology in the Open Space Strategy it is considered this is better suited to an off-site contribution as part of a larger provision. As with the 50-dwelling scheme, all other typologies can be comfortably accommodated on the existing central area of open space. The potential to secure an element of requirements by typology as part of off-site contributions is also consistent with the Infrastructure Delivery Plan supporting the submission version Plan and offers scope to direct contributions specifically towards Parish Council priorities for leisure and recreation.



6.15 In relation to the potential loss of open space as a result of the proposed development, financial contributions are proposed to provide appropriate alternative arrangements/contributions commensurate with existing undelivered obligations, for wider community benefit.

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