

Reference: 17572-02

06 September 2018

Ian Kemp
Harborough Local Plan Programme Officer
16 Cross Furlong
Wychbold
Droitwich Spa
Worcestershire
WR9 7TA

Dear Mr Kemp,

Harborough Local Plan 2011-2031, Proposed Submission Representations on behalf of Mr N Renner Land at Scraptoft Hill Farm, Scraptoft

Further to the representations made on behalf of our client Mr Nelson Renner in November 2017, we are writing to confirm that we wish to take part in the forthcoming local plan hearing sessions, in particular those relating to Matter No. 6 Spatial Strategy and Countryside Protection and Matter SC1 Scraptoft North Development area and the Green Wedge Designation.

Background

Mr Renner lives at Scraptoft Hill Farm, Covert Lane, Scraptoft. The comments that we wish to make are pertinent to his land holdings and the surrounding area. As we have highlighted in our earlier written submission, the proposed Green Wedge Sub Area B covers a large part of our Clients land. Part of this land within the lower slopes of the valley close to Thurnby Brook could be suitable for housing development linked to the adjacent development already with planning permission and benefiting from the direct access to the main road network of the A47.

This option was presented to the Council for consideration, however they maintain their focus on concentrating development on the Scraptoft North SDA, where traffic would have to filter through the existing community to reach the main road network. The effect of this traffic on local road junctions has been raised as matters for further consideration by the Inspector and we wish to highlight that the Scraptoft North SDA is not the only solution to meeting housing growth in the Leicester fringe.

Green Wedge Designation

At the time of the new Green Wedge being designated in the consultation draft version of the Local Plan, no assessment had been undertaken to justify the boundary selected or the general extent of the area. We highlighted the lack of justification for the designation in our original submission.

The Council subsequently prepared the Leicester Scraptoft Bushby Green Wedge Assessment dated March 2018, after the extent of the designation had been released in the Consultation Draft Local Plan. Clearly, this was a retrospective attempt to 'shore-up' their draft policy, seeking to justify the draft policy after it has been made public and in full knowledge of the criticism being levelled against it.

We do not consider this is a sound approach to plan making as the policy was not adequately justified based on sound evidence and consequently was not positively prepared.

Policy GD7

Policy GD7 seeks to apply a green wedge to the northern boundary of approved housing growth to the north of Thurnby, wrapping around the eastern edge of that housing area. In doing so it seeks to prevent any further housing growth in the Thurnby Brook valley, justified on the basis that the countryside between Thurnby and Scraptoft should be protected from development. The underlying purpose of this policy was based upon the negative restriction of development first and foremost, deciding where the restriction should go and then seeking to justify it afterwards. By locking out development in the Thurnby Brook valley, greater weight could be given to the Scraptoft North SDA, which also entailed development on an existing area of designated green wedge, also justified as not being important after the fact. Policy GD7 was not designated based on a positive assessment of the best location for development.

Scraptoft Neighbourhood Plan

The Scraptoft Neighbourhood Plan was adopted as part of the development plan in March 2016. This designated the Scraptoft North SDA area as Green Wedge, a fact not dealt within the Leicester Scraptoft Bushby Green Wedge Assessment from March 2018. The area between Scraptoft and Thurnby was designated as an Area of Separation. This sought fundamentally the same things as the Green Wedge designation, preventing the coalescence of the two villages. Importantly, it did not extend as far to the east and included more land to the north beside Covert Lane. Again, the Leicester Scraptoft Bushby Green Wedge Assessment from March 2018 provides no justification for designating a different area to that included in the Neighbourhood Plan and takes little, if any, account of the Neighbourhood Plan designation. As the Neighbourhood Plan forms part of the statutory development plan, we consider this to be a serious omission.

It is evident that the focus of the new Green Wedge designation was to prevent further development nearer to Thurnby and in doing so has left a large area south of Scraptoft without the protection given to it by the Neighbourhood Plan. We believe that the new Green Wedge is too extensively drawn and should follow the boundary of the Area of Separation identified by the Neighbourhood Plan.

Purposes of the Green Wedge Designation

The purposes of including this land as Green Wedge should also be examined and compared against the boundary included within the adopted Scraptoft Neighbourhood Plan. These include preventing the merging of settlements, which would also be achieved using the boundary for the Area of Separation in the Neighbourhood Plan, arguably this also offers a greater level of protection to the southern side of Scraptoft Village.

Guiding development form would also be achieved using the Area of Separation Boundary, protecting the upper slopes of the valley and the plateau area to the north where development would arguably have a greater impact on a wider area than additional development limited to the valley itself, where it would be less visible from Scraptoft, Thurnby and the A47.

Providing access from the urban areas into the green spaces would remain the same. The footpaths crossing the new Green Wedge Designation also cross parts of the Area of Separation in the Neighbourhood Plan. The footpaths would remain the same in either case, so there is no positive benefit achieved by expanding the area as suggested by the new Green Wedge designation.

Finally, providing recreational opportunities. The new Green Wedge designation provides no additional recreation opportunities over my client's land other than the existing footpaths. These would still be present if the Area of Separation Boundary from the Neighbourhood Plan was used instead. The expanded area of the new Green Wedge has been justified on the basis that access to the countryside and recreation could be improved. That is not the case, it would remain the same as now, and the same as it would be if the Neighbourhood Plan boundary were to be carried forward instead.

Achieving access improvements

The only way that access to the countryside and land for recreation could be improved would be through an agreement connected to housing development. If the land to the north of Thurnby Brook were to be allocated, as we have suggested within the lower slopes of the valley, then there would be an opportunity to provide greater public access across and around other fields in the area, improving connections to the new development and existing villages. Without development to justify improving countryside access and recreation within the Green Wedge, it would remain as it currently stands and is not a positive contributing factor to justify the expansion of the designation.

Summary

We maintain our objections to the designation of the new Green Wedge across an expansive tranche of our Client's land. The Planning Authority failed to justify the initial designation and have acted retrospectively to create a supporting statement that in our view fails to fully justify why the Green Wedge Designation should differ from the Area of Separation defined within the Scraptoft Neighbourhood Plan. As part of the adopted development plan, that designation should be given significant weight as a material consideration and should be used as the basis of a revised Green Wedge Designation.

Our Client has land available to meet the identified need to the north of Thurnby Brook within the confines of the lower valley slopes, where the housing development would be screened by the permitted housing development north the A47 and the topography. Rather than seeking to protect this valley, consideration should be given to using the lower slopes for housing development that has far less impact on longer range views and would maintain the apparent separation between Scraptoft and Thurnby. It would also have the advantage of allowing direct access to the A47, so not having the traffic issues inherent with the proposed Scraptoft North SDA and would allow access to the countryside to be provided over a wider area with dedicated recreation facilities, fulfilling the objectives of the Green Wedge designation.

We would welcome the opportunity to take part in the hearing sessions to assist the Inspector when considering these issues.

Yours sincerely,

Chris Akrill BA(Hons) DipTP MRTPI
Director

Director

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6/9/18.

Nelson Renner.
Scraptoft Hill Farm,
Covert Lane,
Scraptoft,
Leicestershire.

Scraptoft Thurnby Green wedge.

Dear Johnathan Bore.

In order to appreciate why the proposed green wedge is misplaced you should be aware of local factors.

Residents of Thurnby and Bushby are relatively wealthy and politically savvy house holders. Well familiar with the planning system and how to influence it.

They have been represented for about 40 years by the long serving committed councillors. Who work tirelessly for the betterment of their parishioners. Thurnby's senior district councillors have great integrity and have worked constantly for the parishes of Thurnby and Bushby. They predate the

planning officers, and bring to the council huge local knowledge and experience.

They are mentors to the planners, greatly respected by them and the planning committee. Working as they do, at the inception of policy they are able to guide the planning department. Promoting the interests of their electorate. Especially Thurnby, doing all they can to enhance its facilities and protect it from development.

The downside of this success is that development has to go somewhere. Thurnby Bushby and Scraptoft are the preferred location for the required urban extension.

Scraptoft residents are less planning savvy than those of Thurnby and have not had the advantage of talented long serving district councillors. Consequently they have lost out on facilities and been the preferred choice for Thurnby Councillors to deflect development towards Scraptoft.

Scraptoft had a cricket field it was built on. Thurnby has a cricket field it was refurbished. Scraptoft had cricket pravillion it was built on.

Thurnby has a cricket pravillion it was refurbished.

Scraptoft had an important conservation area it was built on.

Thurnby has an untouched conservation area. Scraptoft had a lake open to locals, no longer! Thurnby has a conservation pond open to all. Scraptoft had a fabulous sports hall, it was built on.

Thurnby has two school halls, a memorial hall, a scout hall a pravillion, community facilities east of the Rose and Crown. As well as a purpose built facility adjacent to one of the best children's play areas in the district.

Scraptoft has a poor village hall with no parking, or facilities, and now the hub at great local expense.

Scraptoft has nowhere a child can kick a ball. Thurnby has tennis courts and sports fields with changing facilities and parking.

Yes you have guessed Scraptoft's courts were built on.

Scraptoft has a wildlife area and it is proposed to build on it.

Scraptoft has a golf course, and it is proposed to build on it.

Thurnby councillors naturally prefer Scraptoft North as a development site, because it would protect the house owners in Thurnby. But is it right to concentrate development where all traffic is compromised. Why not the much easier and reliably deliverable one owner site to the south with direct access to the A47?

With regard to the proposed new green wedge why is it put in the valley? Pushing the inevitable development to the high visible ridge at Scraptoft? Could it be to favour the people of Thurnby?

Hopefully a more planning based approach rather than a political view can be applied, to the green wedge proposal.

Yours sincerely,

Nelson Renner.

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