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13th October 2026

Mr Ian Kemp
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**Re: Proposed Submission Draft Harborough Local Plan 2020–2041 – Stage 2 Examination
Matter 7 – Location Development in the Right Place
Issue 2 – Key Development Sites
Site S1 – Scraftoft East, Land between Scraftoft and Bushby**

Representations further to Representation IDs 12733, 12734 and 12735

Dear Sir/Madam,

I wish to make further representations in relation to my original Regulation 19 representations, which were recorded as received by Harborough District Council on **24 April 2025** under Representation IDs **12733, 12734 and 12735**.

Those representations relate directly to the Inspectors' Stage 2 Matters, Issues and Questions concerning Site S1 at Scraftoft East and, in particular, the questions concerning the Green Wedge, infrastructure, flood risk and the cumulative impact of traffic arising from S1, S2 and TB1.

I respectfully ask the Inspectors to consider the following representations when assessing whether the Plan and the proposed allocation of Site S1 are sound.

1. Green Wedge – Stage 2 MIQ, Matter 7, Issue 2, Paragraph 2

The Stage 2 question asks:

“Policy SA04 requires that development maintains an area of Green Wedge between Scraftoft and development to the South including Thurnby and Bushby. Plan paragraph 5.32 explains this is to prevent merging, guide development, provide a green lung and facilitate recreational opportunities. What is the robust evidence to confirm that development would not harmfully diminish the effectiveness of the Green Wedge when assessed against its aims, and that such an approach would further the aims of Plan Policy DS04, which requires the preservation of Green Wedges? Could such an approach involve some reduction in the existing Green Wedge?”

My original Representation **12733** raised concerns that the proposed remaining Green Wedge would be too narrow to perform the functions identified in Policy SA04 and Policy DS04.

Having considered the Council's more recent evidence, I believe this issue requires particularly careful examination.

The Council's **Green Wedge, Areas of Separation and Landscape Topic Paper (March 2026)** acknowledges that the proposed strategy would result in a reduction in the Green Wedge designation. The evidence identifies approximately **80 hectares of Green Wedge remaining, representing a reduction of approximately 13%**.

The Council considers that the remaining Green Wedge would continue to perform its identified functions. However, I question whether the evidence demonstrates sufficiently robustly that the reduction would not materially diminish its effectiveness, particularly its function of preventing the physical and visual merging of Scraftoft with Thurnby and Bushby.

The issue is not simply whether some land remains designated as Green Wedge. The relevant question is whether the **remaining Green Wedge continues to be sufficiently substantial and effective to perform the purposes for which the designation exists**.

There is particular concern regarding the relatively narrow separation that would remain between the settlements. I understand the proposed separation in this location would be approximately **200 metres**, substantially reducing the existing sense of separation.

The Green Wedge should therefore be considered in terms of its **function, continuity, openness and effectiveness**, rather than merely its remaining area.

I respectfully ask the Inspectors to require the Council to demonstrate, with robust site-specific evidence:

1. how the remaining Green Wedge will continue to prevent the merging of Scraftoft with Thurnby and Bushby;
2. how it will continue to function as an effective "green lung";
3. whether its recreational and landscape functions will remain meaningful;
4. whether the reduced separation will remain visually and physically effective; and
5. whether the proposed reduction is genuinely consistent with the requirement in Policy DS04 to preserve Green Wedges.

If the development materially reduces the effectiveness of the Green Wedge, I question whether the proposed allocation is consistent with the Plan's own stated objectives.

2. Cumulative infrastructure – Stage 2 MIQ, Paragraph 4

The Stage 2 question asks:

"How would Plan Policy SA01 S1/SA04 criterion 1b interact with Plan Policy DS05 criterion 1d and criterion 2, which requires a comprehensive approach to coordinating the provision, phasing and funding of necessary infrastructure, taking account of the cumulative and cross boundary impacts arising from the cluster of sites at Scraftoft, Thurnby and Bushby (S1, S2, TB1)?"

My original Representation **12734** raised concerns about the existing pressure on local infrastructure, particularly medical facilities and the road network.

The Council's subsequent evidence reinforces the importance of considering these sites collectively.

The Council expressly identifies **S1, S2 and TB1 as a development cluster requiring a coordinated approach to infrastructure provision**. I therefore believe it is essential that the infrastructure consequences are assessed cumulatively rather than each development being considered principally in isolation.

The Council's updated Infrastructure Delivery Schedule demonstrates the scale of infrastructure required. It identifies a new primary school serving S1, S2, TB1 and Houghton East 2, with an estimated cost of approximately **£11.1 million**.

The fact that such substantial new infrastructure is required demonstrates that the additional population generated by these developments cannot simply be accommodated by relying upon existing facilities.

My concern is therefore not simply whether individual infrastructure projects have been identified, but whether there is sufficient certainty that they will be:

- properly funded;
- secured through appropriate planning mechanisms;
- delivered at the correct stage of development; and
- capable of providing additional capacity before existing facilities become overwhelmed.

In particular, existing deficiencies should not be ignored when assessing the infrastructure requirements generated by new development.

For example, if existing GP, healthcare, school or highway capacity is already under significant pressure, the infrastructure assessment should establish how both **existing deficiencies and additional demand** will be addressed.

I therefore respectfully ask the Inspectors to consider whether the evidence demonstrates that the infrastructure required for S1, S2 and TB1 is sufficiently specific, funded, secured and phased to satisfy Policy DS05.

3. Flood risk – Stage 2 MIQ, Paragraph 5

The Stage 2 question asks:

“Policy SA04 criterion 1g requires a site-specific flood risk assessment to assess the surface water flood risk and access/egress arrangements. What is the robust evidence to provide assurance that the scale and nature of development proposed has accounted for potential flood risk? Would policy requirements be effective in mitigating potential flood risk?”

My original Representation **12735** raised concerns regarding the physical characteristics of the site, including its sloping and undulating nature, surface water and areas of persistently wet ground.

I recognise that the Council’s current evidence does acknowledge that the site has surface-water flood-risk issues and that Policy SA04 requires a site-specific Flood Risk Assessment and appropriate drainage measures.

However, that does not in itself demonstrate that the risk can be satisfactorily mitigated.

The proposed development is on a substantial area of sloping land. There are existing observations of waterlogged areas and water emerging from the ground. These conditions are important local evidence and should be properly taken into account when assessing the site’s suitability.

The issue is also not simply whether drainage can be designed for individual properties. The development will introduce a substantial increase in impermeable surfaces and potentially alter existing natural drainage patterns.

I therefore ask the Inspectors to ensure that the evidence considers:

- existing surface-water flows;
- groundwater and springs;
- the sloping nature of the site;
- existing areas of persistent waterlogging;
- increased impermeable surfaces;
- altered drainage patterns;

- downstream consequences;
- cumulative effects associated with S1, S2 and TB1; and
- safe access and egress during extreme rainfall events.

The Council's own site-selection evidence recognises the need for development to **address surface-water issues**. I therefore ask whether the evidence now before the examination demonstrates sufficiently robustly that this can be achieved at the proposed scale.

4. Highway capacity and cumulative traffic – Stage 2 MIQ, Paragraph 8

The Stage 2 question asks:

“What is the robust evidence that traffic impacts would not have an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would not be severe, given the cluster of sites in the Plan (site allocations S1, S2 and TB1)?”

This is an area where the Council's more recent evidence is particularly relevant.

The Council's **September 2026 Transport Topic Paper** acknowledges that there remains a **residual cumulative impact from Local Plan growth on the highway network requiring mitigation through off-site highway measures**.

The evidence identifies approximately:

- **£8.216 million** for local road network mitigation; and
- **£2.525 million** relating to three Leicester City junctions.

This represents approximately **£10.741 million of identified off-site highway mitigation**.

This is significant because it demonstrates that the Council itself recognises that the Local Plan growth will create a substantial cumulative highway impact requiring significant mitigation.

The Council's evidence also identifies the **A47 Uppingham Road/Scraptoft Lane junction** as a secondary impact location which may require mitigation.

This is particularly relevant to S1 because Scraptoft Lane provides an important connection between the development area and the wider Leicester road network.

I therefore respectfully ask the Inspectors:

If the Council's own evidence identifies a residual cumulative impact requiring substantial off-site mitigation, what evidence demonstrates that the residual impact will nevertheless not be severe and that highway safety will remain acceptable?

The question is particularly important because S1, S2 and TB1 are not isolated developments. The Council itself identifies them as a cluster requiring a coordinated approach.

5. Timing and delivery of highway mitigation

A further concern is whether the necessary highway mitigation will be delivered **in step with housing occupation**.

It is not sufficient for infrastructure to be identified as a future requirement if significant numbers of houses can be occupied before the necessary infrastructure is available.

The Council's evidence identifies substantial expenditure on transport measures associated with the development sites, including walking and cycling infrastructure, public transport measures and travel planning.

I therefore ask the Inspectors to consider whether the Plan contains sufficiently effective mechanisms to ensure that the necessary highway infrastructure is:

secured → funded → constructed → operational

at the appropriate stages of development.

In particular, I ask whether there is sufficient protection against a situation where housing is occupied and additional traffic is generated before the corresponding highway improvements have been delivered.

6. The cumulative scale of development

The three principal sites forming the Scraftoft/Thurnby/Bushby cluster are understood to comprise approximately:

- **S1 – 950 dwellings**
- **S2 – 175 dwellings**
- **TB1 – 125 dwellings**

This represents approximately **1,250 new dwellings** across the three sites.

Using an illustrative average household size of 2.4 people per dwelling, these sites could therefore accommodate approximately **3,000 additional residents**.

This is a substantial increase in population and consequently in journeys, vehicle movements and demand for healthcare, schools, leisure, retail and other services.

I do not suggest that the calculation alone establishes that the sites are unsound. Rather, it demonstrates why the **cumulative effects** identified in the Inspectors' questions are so important.

The highway, infrastructure, flood-risk and Green Wedge consequences should therefore be considered in the context of the combined development rather than solely on a site-by-site basis.

7. Overall soundness

I appreciate that the purpose of the Examination is not to determine whether local residents would prefer development to take place elsewhere.

My concern is whether the evidence demonstrates that the proposed allocation is **justified, effective and consistent with national policy**, and whether the necessary mitigation is sufficiently certain to make the development acceptable.

The Council's own more recent evidence demonstrates that:

- the Green Wedge will be reduced;
- the Council considers that substantial infrastructure is required to support the cluster;
- a new primary school with an estimated cost of approximately £11.1 million is identified;
- significant off-site highway mitigation is required;
- the Council identifies residual cumulative highway impacts;
- the A47 Uppingham Road/Scraftoft Lane junction is identified as potentially requiring mitigation;
- surface-water flood risk is recognised as an issue requiring specific assessment; and
- S1, S2 and TB1 are specifically identified as a development cluster requiring coordinated infrastructure planning.

In my view, these matters make it particularly important that the Inspectors satisfy themselves that the evidence demonstrates not merely that mitigation **can theoretically be provided**, but that it will **be effective, funded, secured and delivered at the appropriate time**.

Request to the Inspectors

I respectfully request that, when considering the soundness of Site S1 and the associated policies, the Inspectors give particular consideration to the following questions:

1. **Green Wedge:** Does the proposed reduction in the Green Wedge materially diminish its effectiveness in preventing the merging of Scraftoft, Thurnby and Bushby?
2. **Infrastructure:** Is there sufficient certainty that the infrastructure required for S1, S2 and TB1 will be funded, secured and delivered in step with development?
3. **Highways:** Given the Council's acknowledgement of residual cumulative highway impacts and the substantial mitigation expenditure identified, is there sufficient evidence that the remaining impact will not be severe?
4. **A47/Scraftoft Lane:** Is the evidence sufficiently robust to demonstrate that the cumulative effect on this junction and the wider network will be acceptable?
5. **Flood risk:** Does the evidence adequately demonstrate that surface-water and groundwater issues associated with the physical characteristics of the site can be satisfactorily mitigated at the scale proposed?
6. **Cumulative effects:** Has the combined impact of S1, S2 and TB1 been adequately assessed in relation to highways, infrastructure, flood risk and the Green Wedge?

I respectfully submit that these matters require careful consideration before the allocation of S1 can be regarded as sound.

I would therefore ask the Inspectors to consider whether modifications are necessary to ensure that the Green Wedge is adequately protected and that the necessary highway, medical, educational and drainage infrastructure is secured and delivered at an appropriate stage of development.

Please note I have used AI to help me draft my further representations

I used it to help me summarise and use the most appropriate language to clearly explain the points I wished to make.

I have checked my response, and I am responsible for what it says.

Thank you for considering my representations.

Yours faithfully,

James Hudson

James Hudson

(Representing Scraftoft residents action group)

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13th October 2016

Previous Representation IDs: 12733, 12734 and 12735