

LOCAL PLAN EXAMINATION: HEARING SUBMISSION

Examination: Harborough District Council Local Plan 2020 -2041

Matter Number: Matter 7 Locating Development in the Right Place

Issue 7.2: Key Development Sites: Leicester Urban Area: Scraptoft Site S1

Submitted by; Mrs Maureen Hill (I.D. 7973) (Representing the Scraptoft Residents' Action Group)

Date 7th October 2026

1. INTRODUCTION

- 1.1 This hearing statement is submitted in support of my original Regulation 19 representations. It directly addresses the Inspector's Question Issue 7.2: Key Development Sites: Leicester Urban Area: Scraptoft Site S1 concerning the soundness of the plan in particular relation to Question 8: "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", together with points/comments relevant to other questions set out under Issue 7.2 (as indicated below, but without prejudice to these points/comments being relevant to all matters at issue).
- 1.2 As argued below, the inclusion of Site S1 fails the test of soundness and is **not consistent with national policy** (specifically the National Planning Policy Framework / NPPF). It fails to take into account severe local infrastructure deficits and existing highways issues and pressure from surrounding developments as well as threats to the local environment that have not been mitigated in robust evidence presented by council. To make the Plan sound, Site S1 should be removed from the plan or significantly reduced in scope.
- 1.3 This submission should be read in conjunction with all other submissions made by persons associated with the Scraptoft Residents' Action Group in addressing Strategic Site S1 and the proposed Local Plan in general.

2. RESPONSE TO THE INSPECTOR'S ISSUES AND QUESTIONS:

The Allocation is Not Justified due to Lack of Robust Evidence

Site S1 Question 2 and 8:

- 2.1 The council proposes that the only possible entry and exit to this site would be via a "square-about" that would be placed on land that in Policy DS04 of the Local Plan has been designated as a green wedge area and is adjacent to the historic centre of Scraptoft village and the Grade 1 listed Parish Church with parts dating back to the 13th Century as

well as the Grade II listed 15th Century Preaching Cross, the Grade II listed vicarage which sits on the corner of Covert Lane and the 18th Century Grade II listed Scraptoft Hall, next to the church. **(Appendix A)** There is substantial scientific evidence to show that car exhaust fumes damage historic buildings through chemical and physical erosion and dark soot soiling and therefore introducing more traffic into such an area **is not consistent with the National Planning Policy Framework Ch 16, Conserving the Historic Environment paragraph 195 and would seem to contravene Harborough District Council's own Policies SA04 and specifically DM03 that aims to protect listed buildings.**

Site S1 Questions 4 and 8:

- 2.2 Covert Lane itself, which would give primary access to this site allocation, is little more than a country lane. Traffic from 950 houses would be forced onto Station Lane, a local, unclassified distributor/access road, via the “square-about” at a pinch point where it joins with Scraptoft Lane and Church Hill. The concept of a “square-about” is completely untested in this context and given the proposed scale of this development would have to be constructed at a fairly early stage at substantial cost on a site, that at present, is only considered **marginally viable**. The question therefore has to be asked as to whether this site is a **viable** or **deliverable** option.
- 2.3 In the PRTM Highway Impact Modelling Assessment it is stated that the junction of Station Road (an extension of Station Lane) with the A47 is currently operating at 92 – 93.5% capacity, above the desirable 90% threshold and that by 2037 saturation at this junction would be up to 97.2 – 108.4% accompanied by a noticeable increase in delay and queuing at the junction. However, the report claims that the addition of another 950 + houses in the area will not have any detrimental impact on the junction. It is impossible to see how this statement can be accurate, given that there is a requirement in an outline planning application specification that each home with more than 3 bedrooms should have parking available for 3 cars. Traffic leaving the new development will have only a choice of two directions to travel in, down Scraptoft Lane or along Station Lane/Station Road so it is difficult to see how this would not severely impact the Station Road/A47 junction at peak times.
- 2.4 The LCC Highways response dated 24.04.26 to an outline planning proposal for this site is not positive in regards of the development highways proposals.
- 2.5 There is also the cumulative impact of traffic from other developments in the area that has not been considered in the PRTM Highway Impact Modelling Assessment. These include Sites S2 and TB1 as well as the impact of traffic coming along Hamilton Lane, through Scraptoft Village onto Station Lane from the huge, as yet unfinished, Thorpebury in the Limes development at Thurmaston.
- 2.6 The site is not close to either a railway station, the nearest being just over 4.5 miles away, or any motorway. The distance to the M1/M69 junction is over 12 miles via the outer ring road and can take 45 - 60 minutes to reach by car at peak times.
- 2.7 The South Leicestershire Joint Transport Evidence Stage 2 Interim Report fig 2.1 also shows that the Cumulative Housing and Employment Growth within Harborough District Council from 2036 – 2051 is estimated at approximately 200% for housing and 25% for employment and this indicates that people will need to travel for work as there will not be sufficient growth of employment within the area and this may well result in greater reliance on the car.

Site S1 questions 1, 4, 7 and 8

- 2.8 The Council state that to mitigate these issues, sustainable travel options will be put in place. However, no robust timeline is given as to when these will be introduced nor to how these will be implemented or match the needs of those living on the allocated site. There are proposals for cycle paths on a submitted outline planning application, but these are **not effective** in reducing car use unless they lead to somewhere people want to go and there is no evidence that this has been explored robustly and the same is true of pedestrian routes. The South Leicestershire Joint Transport Evidence Stage 2 Interim Report paragraph 4.11 states “The development of mitigation measures has not involved a detailed assessment of the measures’ viability or deliverability - these factors were only considered through stakeholder feedback.”
- 2.9 For a site to be **effective, sustainable and viable** so that reliance on a car is not essential, residents should be able to access amenities within a reasonable walking distance. There are currently few amenities in Scraptoft nor within a submitted outline planning proposal for the site, that would make this a reality. There is no Medical Centre, no Secondary School with the majority of secondary age students being bussed or driven to schools in Oadby, no significant recreational facilities i.e. swimming pool, gym and no significant shopping area. There are also no direct bus routes to these amenities. Additionally, it is the case that many parents drop their children off at school by car because they then continue straight on to work afterwards. Neither are there any significant employment opportunities in the area and so it is completely unrealistic to suppose that people are suddenly going to abandon car use and that traffic issues are not going to be significant if this allocation is allowed to proceed. **Therefore, this allocation directly contradicts national policy to reduce carbon emissions from transport as well as failing under paragraph 115 of the National Planning Policy Framework.**
- 2.10 The bus service in Scraptoft is poor with buses running an hourly service into Leicester City on weekdays the final bus leaving Scraptoft at 19.00 Monday to Friday and 17.23 on a Saturday and no Sunday service. Despite a significant increase in house numbers over the years, this service has decreased since the mid 1990’s and again the Council has provided no robust evidence that the service will increase with the addition of still more housing and unless it does so, the site is **unsustainable**.
- 2.11 The National Planning Policy Framework Section 3 paragraph 36 states that Local Plans are “**Sound**” if they are “**Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;**”
- a:** I contend that there was one other site considered in the SHELAA assessments, site ref 21/8/150 for an almost identical number of homes to those proposed for S1 Scraptoft East, and very close to Site S1. Site ref 21/8/150 was not named as an allocated site, but in terms of direct access to the A47 should, in theory, be a more appropriate site for housing and for which an outline planning application had been submitted.
- b:** As reported by HFM News (Local Market Harborough Radio Station) Harborough District Council have said (12th September 2026) that “Had it been able to determine the application (for site 21/8/150), outline planning permission would have been refused. The reason given for refusal is that “The developers have failed to demonstrate that the significant impacts of the scheme on the transport network, including capacity and congestion, can be mitigated, alongside concerns over highway safety.”

c: And yet the highway “junctions” i.e. Uppingham Road/Station Road, and others affected by this site are the same ones that would be affected by the development of site S1, excluding the proposed “square-about” at site S1 which brings its own unique issues and safety concerns, alongside congestion and capacity issues for which no robust mitigation has been put forward.

d: Unfortunately, the original documents for transport relating to site ref 21/8/150 are currently listed as “unavailable for viewing” on the HDC website so direct comparisons at the time are difficult to make here. However, I believe that the Local Plan is “**not sound**” as a reasonable alternative was not robustly considered, not only in terms of transport and highways but also in other areas.

Site S1 question 3:

- 2.11 It appears that there is a heavy reliance on Site S1 Scraftoft East to help deliver housing for Leicester City despite the fact the site is only marginable viable and therefore questions must be asked about the ability to deliver 40% affordable housing. In effect Scraftoft East will become urban sprawl to create commuter development with significant reliance on the car due to lack of suitable infrastructure, rather than supporting viable and sustainable growth and appropriate development of Scraftoft as a recognisable village, separate from Leicester City.

The Allocation of Site S1 Scraftoft East is Not Effective or Deliverable

The allocation fails under paragraph 115 of the National Planning Policy Framework in that the impact of traffic from 950 houses on an urban/rural fringe development with poor infrastructure will result in **severe** traffic impact that the strategic modelling by Harborough District Council fails to account for, especially during peak-hours gridlock. I attach photos to show this in **Appendix B**

PROPOSED CHANGES TO MAKE THE PLAN SOUND

Remove Site S1 Scraftoft East from the Local Plan completely
Alternatively reduce the allocation to a maximum of 100 - 120 houses that so that traffic impact on the local area is sustainable and manageable without the need for extensive and costly alterations to unclassified roads that will do nothing to reduce the actually volume of traffic produced by a site of 950 houses emerging onto one already heavily congested road.

CONCLUSION

Site S1 Scraftoft East is an **unsustainable, unsound and unjustified** choice as a Strategic Development Area. I believe that on many levels in addition to highways and transport, better alternative sites are available for this type of development and **I respectfully request that this site should be withdrawn from the Local Plan.**

APPENDIX A:



Photo showing the current mini roundabout at the junction of Scraptoft Lane, Station Lane, Church Hill and Covert Lane with the no entry signs to Church Hill on the left. The mini roundabout is sited just before the location of the proposed “squareabout”

AND



The no entry sign shown above, demonstrating the proximity of the proposed new road layout to the heart of Scraptoft Village.

APPENDIX B:

October 2026



Bus struggling to turn from Station Lane into Pulford Drive during the morning rush hour



Traffic queuing in the morning rush hour backed up from near the top of Station Lane going down towards Station Road.

APPENDIX B:

September 2026



Traffic backed up from the junction of Station Lane with Pulford Drive to the traffic light junction of Station Road with Uppingham Road. This distance is approximately 1 kilometre.

This is rush hour traffic and is typical of an average day.



Same junction as above but demonstrating the size of some vehicles using the road.

Statement:

AI was used to suggest a format for this submission and has been used to assist me in understanding policies for my submission.

AI has NOT been used to write the submission document.

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

Maureen Hill