

Written Statement

On behalf of Davidsons Developments Limited and Jelson
Homes

Harborough Local Plan to 2041 - Examination

Matter 7: Locating Development in the Right Place

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Control Sheet

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1. ISSUE 1 – DIRECTING DEVELOPMENT TO THE RIGHT PLACE

Q1. How Policy AP01 sets out that in addition to sites allocated in Plan policy SA01, development will be permitted within the existing built-up area or settlement limits (Policy AP01 criterion 2), and on land adjoining the existing built-up area settlement limits (Policy AP01 criterion 3), subject to certain criteria. However, does the Plan define these terms in relation to each settlement in the settlement hierarchy? In this regard would the policy be effective in its application?

1.1. No Comment

Q2. Given the above, how would policy AP01 interact with policy AP03 and AP04 in relation to development in the countryside?

1.2. No Comment

Q3. Are the criteria in policy AP01 criterion 2 clear and unambiguous so that it is evident how a decision maker should react to development proposals, and thereby accord with NPPF paragraph 16d?

1.3. No Comment

Q4. Would policy AP01 criterion 3f provide the necessary clarity for decision makers and applicants through the development management process? Would it be necessary, in the interests of soundness, to include within policy AP01 3f for circumstances where Plan policies most important for determining the application are out of date due to the lack of the five-year housing land supply?

1.4. No Comment

Q5 Policy AP01 criterion 4 excludes Green Wedges and Areas of Separation site allocations and existing commitments from the definition of land adjoining the existing built-up area/settlement limits. Is this approach justified by the evidence and consistent with national policy?

1.5. The exclusion of allocated sites from the operation of Policy AP01 is supported. Scaptoft East is allocated through Policy SA01 and governed by the site-specific requirements of Policy SA04.

Q6 Would Plan policies support development to achieve Made Neighbourhood Plan housing needs?

1.6. No Comment

2. ISSUE 2: KEY DEVELOPMENT SITES

Q1 Are the following proposed residential development/mixed use and employment allocations justified, based on up-to-date evidence, effective, and consistent with national policy?

- 1.7. **Yes.** The allocation of Scraftoft East under Policy SA04 is justified, based on up-to-date evidence, effective and consistent with the December 2023 NPPF.
- 1.8. The allocation forms part of a positively prepared strategy. Scraftoft forms part of the Leicester Urban Area and is placed within Tier 1 of the Plan's settlement hierarchy. The Plan appropriately directs a substantial proportion of growth to this area because of its close relationship with Leicester access to employment, services and opportunities for sustainable travel. Scraftoft East's delivery of 950 homes will therefore make a substantial contribution towards meeting Harborough's housing requirement, including the agreed contribution towards Leicester's unmet housing need.
- 1.9. The allocation is justified by a proportionate and up-to-date evidence base prepared through the Local Plan process. The 2025 Site Assessment report¹ considered the site against reasonable alternatives and identified it as the preferred allocation due to it being well related to the existing built form and better placed to accommodate the required growth than other potentially deliverable sites of a comparable scale within the Scraftoft, Thurnby and Bushby area.
- 1.10. Policy SA04 is also effective. The site is controlled and actively promoted by established housebuilders (Davidsons and Jelson) and is subject to an outline planning application (26/00289/OUT²) which provides a clear delivery mechanism. The Plan's housing trajectory anticipates delivery of all 950 homes between 2030/31 and 2039/40. The scheme can therefore be delivered in full within the Plan period alongside the necessary infrastructure.
- 1.11. The allocation is consistent with national policy. It supports a sufficient supply of homes, directs growth to a sustainable urban-edge location, makes effective use of land and enables the creation of an integrated community supported by necessary infrastructure. It therefore enables sustainable development and satisfies the test of soundness in paragraph 35 of the December 2023 NPPF.

Additional Site-Specific Questions - LEICESTER URBAN AREA

Scraftoft Site S1: Scraftoft East, Land between Scraftoft and Bushby (950 homes) Policies SA01 and SA04

Q1 . Policy SA04 criterion 1 refers to a masterplan, the detailed requirements of which are included at Plan Appendix 6. Does the policy clearly set out that a masterplan will be

¹ [Site Selection Methodology Feb 2025 | Site Selection Methodology Feb 2025 | Harborough District Council](#)

² [26/00289/OUT | Outline planning permission with all matters reserved apart from access for up to 950 units including Later Living Accommodation \(Use Class C3\); 2FE primary school with early years provision \(Use Class F1\); public open space; drainage system, landscaping, habitat creation, ground works, internal roads/routes; and associated infrastructure | Land South Of Covert Lane Scraftoft Leicestershire](#)

required, who should prepare it and what the timescale for its provision and approval mechanism would be?

- 1.12. **No.** Policy SA04 does not currently provide sufficient clarity regarding the preparation, timing or approval of the required masterplan. Although criterion 1 requires development to be brought forward in accordance with a comprehensive masterplan, neither the policy nor Appendix 6 clearly identifies who should prepare it, when it should be submitted, or the mechanism through which it would be approved.
- 1.13. The requirement should therefore be amended to confirm that the masterplan is to be prepared jointly by the relevant promoters and submitted alongside an outline or full planning application. It should then be considered and approved by the Council through the normal development management process. There is no justification for requiring a separate supplementary masterplan or additional approval exercise outside the determination of the planning application, as this would duplicate work, and potentially delaying delivery without providing any additional planning benefit.
- 1.14. In practice the requirement is already being addressed through the outline planning application. Davidsons and Jelson have submitted a joint illustrative masterplan (Appendix 1), supported by a suite of parameter plans, which together provide a coordinated framework as part of the outline application for Scraftoft East.
- 1.15. These documents are therefore capable of satisfying the comprehensive masterplanning objective of Policy SA04, subject to their consideration through the determination of the outline planning application. The illustrative masterplan should not be treated as fixing the detailed layout of the development. Rather, it demonstrates how the principles established through the parameter plans could be delivered in a coordinated manner across the allocation.
- 1.16. Policy SA04 and Appendix 6 should therefore be modified to clarify that the comprehensive masterplanning framework is to be prepared jointly by the relevant site promoters and submitted for consideration as part of an outline or full planning application. Its approval should take place through the normal development management process, without any separate supplementary masterplanning or approval exercise.

Q2 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?

- 1.17. The allocation will involve some reduction in the existing Leicester/Scraftoft/Bushby Green Wedge. However, this does not mean that its effectiveness will be diminished or that the approach conflicts with Policy DS04. The Green Wedge is a spatial planning designation and its purpose is not to prevent all outward growth. Its functions are to prevent the merging of settlements, guide development form, provide a green lung and facilitate recreational opportunities.

- 1.18. The December 2024 Harborough District Green Wedge Assessment³ provides relevant evidence against each of those functions. It identifies sub-area GW1B (in which Scraftoft East is located) as making a strong contribution to settlement separation and guiding development form. Although the Assessment acknowledges that Scraftoft and the wider Leicester Urban Area have already merged along Station Lane and expressly accepts that development could be accommodated within the southern part of GW1B while retaining perceived separation between Scraftoft and Thurnby/Bushby. The contribution made by GW1B is therefore not uniform across the whole sub-area and the Assessment itself supports the principle that some development can occur without undermining its functions.
- 1.19. The Assessment's general recommendation to retain all existing boundaries does not adequately balance Green Wedge protection against the need to accommodate development in the most sustainable locations. The designation has existed since the 1980s and must be considered in the context of the current housing requirement, and the strategy of directing substantial growth to the edge of the Leicester Urban Area. Preservation of the Green Wedge under Policy DS04 should not therefore be interpreted as requiring every existing boundary to remain unchanged, regardless of the Plan's development needs.
- 1.20. Policy SA04 provides the appropriate mechanism for achieving that balance as it makes a planned adjustment to the extent of the Green Wedge while requiring a meaningful area to be maintained between Scraftoft and Bushby / Thurnby. The allocation would not result in gradual or piecemeal erosion of the Green Wedge. It forms part of the Local Plan's planned spatial strategy and responds to the site's topography, the existing development along Station Lane and the need to retain a clear area of separation.
- 1.21. The resulting Green Wedge would also continue to perform its function as a 'green lung' as it would form a substantial area of connected green infrastructure extending from the wider countryside into the urban area and between the surrounding areas of development. This form of Green Wedge is consistent with the established pattern elsewhere around Leicester, where green lungs have been retained as the Principal Urban Area has expanded, often following watercourses and wider green infrastructure networks. The proposed adjustment would therefore reshape the Green Wedge as part of a planned urban extension, rather than undermine its overall purpose.
- 1.22. The outline application further demonstrates how the Green Wedge's functions can be retained. The parameter plans establish the broad development framework, while the illustrative masterplan at Appendix 1 shows how this could be delivered. Together, they retain and enhance the meaningful gap by demonstrating how it is to provide connected open space, landscaping, habitats, sustainable drainage and recreational routes which will be readily assessable to the public over the current private ownership. Although the detailed layout will be determined through reserved matters, there is sufficient assurance that the Green Wedge will continue to prevent harmful merging, guide development and provide accessible green infrastructure.

³ [Green Wedge Assessment Dec 2024 | Harborough District Council](#)

Q3 The Local Plan Viability Report, 2025 [INF-NLP3] considered this site to be marginally viable (with 40% affordable housing target)? Is there any update to this position?

- 1.23. **Yes.** There has been a material update to the position presented in the Local Plan Viability Report 2025⁴. While the assessment identifies Scraptoft East as ‘marginally viable’ when providing 40% affordable housing, this was based on generic assumptions and was prepared before the present delivery arrangements and infrastructure position were established.
- 1.24. The site is being promoted by Davidsons and Jelson, who have clear control over substantial parts of the allocation. Jelson owns its landholding, while the Davidson element is controlled through a family landholding vehicle over which Davidsons holds an option. Both developers intend to deliver the development directly. This materially reduces uncertainty concerning land assembly and indicates that the generic benchmark land value per gross acre applied in the Assessment may overstate it. Together with the subsequent reduction in plan-wide infrastructure costs reported by Aspinall Verdi, this supports the position recorded that the appraisal represents a conservative assessment of the site’s viability.
- 1.25. In conclusion, the findings of the Viability report that the site as marginally viable should not be treated as evidence that it is undeliverable. It reflects the effect of generic assumptions, including benchmark land value and then-current infrastructure costs, rather than the promoters actual controlling interests and the detailed delivery arrangements now being progressed.

Q4. 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 Scraptoft, Thurnby and Bushby (S1, S2, TB1)?

- 1.26. Policy SA04 criterion 1b is consistent with the comprehensive approach required by Policy DS05. The Infrastructure Delivery Plan 2025⁵ identifies a new two-form-entry primary school (with early years provision) on a two-hectare site as the appropriate solution to meet the combined pupil demand arising from the cluster of allocations S1, S2 and TB1. It identifies an assumed yield of 375 primary pupils across the cluster, with the school to be delivered between 2030 and 2035 through developer funding.
- 1.27. The allocated school site is to be provided through Scraptoft East and Davidsons and Jelson are committed to facilitating its delivery through the outline planning application. Its location within the largest of the three allocations provides a clear and deliverable mechanism for meeting the cluster’s primary education needs. The timing, transfer and funding arrangements can be secured through the Section 106 agreement in agreement with Leicestershire County Council as the local education authority.

⁴ [Local Plan Viability Report Jan 2025 | Harborough District Council](#)

⁵ [Infrastructure Delivery Plan Feb 2025 | Harborough District Council](#)

- 1.28. This provides the comprehensive approach sought by Policy DS05 without requiring all three sites to progress simultaneously. However, as set out in our clients Regulation 19 representations, Policy DS05 criterion 1d should make clear that allocations S2 and TB1 will be required to make proportionate financial contributions towards the delivery of the new primary school at Scraftoft East, reflecting the pupil demand generated by each development. This would provide a coordinated funding mechanism while securing accessible primary and early years education close to the new homes it will serve.
- 1.29. The same coordinated approach will apply to other infrastructure required to address the cumulative impacts of S1, S2 and TB1, including transport, education and any other shared infrastructure identified through the Infrastructure Delivery Plan and the planning application process. However, the precise requirement and apportionment must be supported by evidence and reflect the impact generated by each allocation. Policy DS05 should not require Scraftoft East to fund wider infrastructure that is intended to address existing deficiencies or impacts unrelated to the development.

Q5 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?

- 1.30. The position has advanced through the outline planning application. A site-specific Flood Risk Assessment and Drainage Strategy⁶⁷⁸ has assessed surface-water risk and drainage arrangements across the whole extent of the allocated site. The site lies within Flood Zone 1 and the proposed drainage strategy incorporates six discharge points, attenuation basins and a range of SuDS measures, with surface water discharged to the on-site watercourse at a combined restricted rate of 69.7 litres per second.
- 1.31. In its response dated 28 July 2026, Leicestershire County Council, as Lead Local Flood Authority, confirmed the development acceptable subject to conditions.
- 1.32. The Site Assessment 2025 confirms that the site is within Flood Zone 1, while recognising the surface-water risk associated with the tributary of Thurnby Brook. It concludes that this can be addressed through a sequential approach to the layout, with no overriding flood-risk constraint identified. This has since been supported by the submitted Flood Risk Assessment and Drainage Strategy. Policy SA04 criterion 1g is therefore effective, with the detailed SuDS design and its long-term operation capable of being secured through reserved matters, planning conditions and the requirements of the LLFA. This also allows the final drainage scheme to respond to the relevant national standards and detailed site design.

⁶ https://pa2.harborough.gov.uk/online-applications/files/9D9EE4740F8CDDF33FC30F68FDF00B4F/pdf/26_00289_OUT-FRA_AND_DRAINAGE_STRATEGY_PART_1_OF_3-1468882.pdf

⁷ [26_00289_OUT-FRA_AND_DRAINAGE_STRATEGY_PART_2_OF_3-1466702.pdf](#)

⁸ [26_00289_OUT-FRA_AND_DRAINAGE_STRATEGY_PART_3_OF_3-1466703.pdf](#)

Q6. Policy SA04 criterion b requires a site for a two form primary school. Is the requirement clear and unambiguous? Should it make provision for a monetary contribution to educational provision? Would this be justified?

- 1.33. The requirement for a two-form-entry primary school is justified, but criterion 1b should be clearer about its delivery and funding. The Infrastructure Delivery Plan 2025 identifies a combined yield of 375 primary pupils from allocations S1, S2 and TB1 and confirms that the appropriate solution is a two-form-entry primary school on a two-hectare site.
- 1.34. Scraftoft East will provide the school site and facilitate delivery through reserved matters secured as part of the outline planning application. S1 may also make an appropriate financial contribution towards primary provision, but the overall requirement should be proportionate to the pupil demand generated by the development and should take full account of the land and associated infrastructure being provided on-site. Contributions should also be secured from S2 and TB1 in proportion to the demand generated by those allocations, given that the school is intended to meet the combined needs of the three sites. Any contribution must be supported by evidence and satisfy the relevant statutory tests for planning obligations.
- 1.35. Separate, proportionate contributions towards secondary, post-16 and other education provision may remain justified. The IDP identifies a combined requirement for contributions from S1, S2 and TB1 towards new secondary and post-16 provision, rather than on-site secondary provision within Scraftoft East or one of the other identified sites. Criterion 1b should therefore be amended to distinguish clearly between the on-site primary school and any proportionate financial contributions required for wider education provision.

Q7 the size and complexity of development proposed, what is the robust evidence, having regard to the NPPF definition of deliverable, to indicate that this site will start to deliver in 2030/31?

- 1.36. There is clear evidence that Scraftoft East is deliverable and capable of commencing housing delivery from 2030/31. The site is jointly controlled and promoted by Davidsons and Jelson, two established regional housebuilders who have substantial amount of experience in the delivery of projects within Scraftoft and the wider Leicestershire region. Their coordinated approach, including the preparation and submission of a joint application, provides a credible mechanism for bringing forward development across the allocation and supporting a sustained build-out.
- 1.37. An outline planning application covering the site was submitted in February 2026 and is being actively progressed with the Council and statutory consultees. The technical evidence supporting that application has identified no fundamental constraints that would prevent development. The site promoters are working towards securing outline permission and the associated planning obligations, following which reserved matters, condition discharge and enabling infrastructure can be progressed.
- 1.38. The current trajectory allows a reasonable period for those stages to be completed before the anticipated commencement of housing delivery. The active involvement of two housebuilders provides the potential for more than one development outlet and a sustained build-out.

- 1.39. The site is therefore available, represents a suitable location for development and has a realistic prospect of beginning housing delivery within the relevant five-year period, consistent with the definition of “deliverable” in Annex 2 of the 2023 NPPF.

Q8 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)?

- 1.40. Robust transport evidence has been submitted with the outline planning application, including a Transport Assessment⁹, Travel Plan¹⁰ and the transport chapter of the Environmental Statement¹¹. The Transport Assessment considers highway safety, junction capacity and the operation of the wider network using the Pan-Regional Transport Model and appropriate future-year scenarios. Importantly, the cumulative assessment includes the planned growth at Scraftoft, including allocations S2 and TB1, rather than assessing Scraftoft East in isolation.
- 1.41. A Planning Performance Agreement is also in place with Leicestershire County Council and Leicester City Council, providing a regular forum for the applicants and highway authorities to discuss the transport evidence, identify any outstanding matters and agree appropriate mitigation. This ongoing dialogue provides further assurance that the detailed highway measures can be resolved and coordinated through the outline planning application process.
- 1.42. This evidence provides an appropriate basis for identifying the effects attributable to Scraftoft East and the proportionate mitigation required to ensure that there would be no unacceptable impact on highway safety and that residual cumulative impacts would not be severe. The proposed measures include the new ‘squareabout’ at the Covert Lane, Station Lane junction, access and active-travel improvements, bus-capable routes and wider junction mitigation. The detailed form, timing and delivery of those measures can be secured through planning conditions and obligations
- 1.43. However, the cumulative assessment of planned development does not make Scraftoft East responsible for resolving pre-existing deficiencies or funding general improvements unrelated to its effects. Any mitigation or contribution sought through Policies SA04 and DS05 must be necessary, directly related to the development and fairly and reasonably related in scale and kind, based upon the impacts quantified through the Transport Assessment. Subject to that important qualification, the submitted evidence provides a robust mechanism for ensuring that the cluster’s cumulative impacts are appropriately assessed and mitigated.

⁹ https://pa2.harborough.gov.uk/online-applications/files/E97CD34BAE82080487E85A1DB2EB6452/pdf/26_00289_OUT-TRANSPORT_ASSESSMENT-1466711.pdf

¹⁰ [26_00289_OUT-TRAVEL_PLAN-1466712.pdf](#)

¹¹ [26_00289_OUT-ENVIRONMENTAL_STATEMENT_-_VOLUME_2_-_TECHNICAL_APPENDICES_2-1469106.pdf](#)

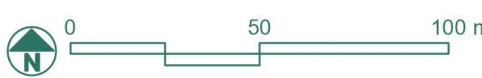
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3. APPENDIX A: ILLUSTRATIVE MASTERPLAN – SCRAPTOFT EAST.



Key

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|--|--|--|---|--|---------------------------------------|
| | Application site boundary | | Public Right of Way | | Indicative extent of residential area |
| | Existing (retained) trees & hedgerow | | Public Right of Way to be re-directed | | Potential location for school |
| | Indicative proposed planting | | Proposed pedestrian/cycle link | | Potential location for later living |
| | Open space | | Landscape buffer | | Potential for equipped play/LEAP |
| | Indicative surface water attenuation basin | | Potential locations of landmark buildings | | |



nineteen47
CHARTERED TOWN PLANNERS
& URBAN DESIGNERS

Project
Scraptoft

Drawing Title
Masterplan

Project Code	Drawing Nr	Rev
n2372	005	P
Date	Drawing Scale	
18.07.2025	1:2,000 @ A1	