Harborough District Local Plan Examination

Response to the Inspector's Questions

Scraptoft North Strategic Development Area

On behalf of

Parker Strategic Land

September 2018

Response To Questions

1.0 Introduction

1.1 This response has been prepared by Parker Strategic Land Limited to address the questions raised by the Inspector concerning the proposed Scraptoft North Strategic Development Area (SDA). Parker Strategic Land are promoters of the strategic allocation and have interests over the whole of the SDA defined by the Local Plan in Policy SC1 and in the proposals plan.

1.2 As well as promoting the site through the Local Plan process, the promoter is preparing planning applications for the SDA as whole with detailed applications for the first phase of development[1], as well as preparing proposals for the replacement golf course at Houghton on the Hill in conjunction with Scraptoft Golf Club. This work is at an advanced stage and in addressing the Inspector's questions we have drawn from the work carried out in the preparation of these applications, especially the Transport Assessment (TA) and traffic modelling results and assessments undertaken within the Environmental Statement. Our response is outlined below and is supported by two appendices that provide information on the transport and air quality modelling results respectively.

1.3 The Inspector's questions are identified in turn below in italics with our response below.

2.0 Response to the Inspector's Questions

8.4 What is the full anticipated effect of this allocation on the following locations, having regard to the evidence base?

Scraptoft
Keyham Lane West
New Romney Crescent
Station Road and its junction with A47 Uppingham Road
A47 towards Leicester
Other relevant streets and roads

In respect of:

traffic movement and congestion
safety and congestion near schools
the pedestrian environment
air quality
the village character
the historic environment
residential living conditions

Traffic Movements and Congestion

2.1 We have undertaken a TA to identify the impacts resulting from the proposed development and inform appropriate levels of mitigation. The results of the TA support Harborough District Councils position that the impacts from the proposed development are modest and within the available highways capacity, and that mitigation measures can be implemented to

[1] The first phase is expected to inlcude some 300 new homes on two sites, the link road across the site, the 'Brook Park' and the primary school.

ensure the highway conditions are no worse than would be the case if the development did not take place. The TA demonstrates that there would not be an unacceptable impact on highway safety and that the residual cumulative impact is not 'severe' in the context of the definition included in the National Planning Policy Framework.

2.2 Given the location of the site, the TA has been undertaken in close consultation with both Leicestershire County Council and Leicester City Council as the adjoining highway authorities. The TA is based on agreed trip generation levels for the development based on 'cloned' figures from similar locations within the urban area. The trip generation rates are shown in Appendix 1 Table 1. It is worth noting that the figures used are higher than similar recent urban extensions to the City and in Harborough District and so are considered to be robust[2]. Other factors may also reduce the level of trips from the development and we consider these further below.

2.3 The extent of the modelling work has been agreed with both Leicester City and the County as highway authorities.The model used is the Leicester and Leicestershire Integrated Transport Model (LLITM), and the modelling work has been undertaken by the County Council and their consultants. The results compare the existing traffic flows against the predicted traffic flows in 2031 with and without the traffic movements associated with the proposed development. The proposed traffic flows include for committed developments that are likely to have an impact on the roads in the local area and also includes for background growth which identifies a 13% uplift in traffic movements between 2018 and 2031. The results from the model are shown in Appendix 1 Table 2.

2.4 The largest increase in traffic flows are projected to be along Hamilton Lane (south of Keyham Lane West), Keyham Lane West, New Romney Crescent and Scraptoft Lane. This is not surprising as these are the main routes serving the development from the City. In order to accommodate the increases in traffic, it is believed that improvements will be required to the following junctions:

- Station Road / A47 Uppingham Road junction – improvement proposed to include reconfiguration of the junction and provision of MOVA[3];
- Hamilton Lane / Maidenwell Avenue – improvement includes road widening and adjustments to existing road markings;
- Scraptoft Lane / New Romney Crescent – improvements include a mini-roundabout junction and central pedestrian refuge island; and
- Colchester Road / Scraptoft Lane – provision of MOVA.

2.5 All of these proposed improvements are considered to be deliverable and within the extent of the public highway.

2.6 All of the other surrounding roads are considered to operate within capacity in terms of the levels of traffic that they will accommodate once the development is complete.

[2] Including Thurmaston, Broadnook, Hamilton Leys (all Charnwood) and Airfield Farm (Harborough).

[3] MOVA is Microprocessor Optimised Vehicle Actuation, an intelligent operating system for signals allowing green times to vary depending on demand which can, according to Dept. for Transport trials, show an average 13% reduction in delays compared to fixed timing systems.

2.7 It should be recognised that the traffic levels assumed through the model are considered to be 'robust'; that is, they potentially overestimate the traffic that is likely to be generated because:

- The background growth includes some growth associated with committed schemes, so there is an element of double counting;
- School trips are assessed as additional traffic to the development and, in practice, this would be part of the development traffic as some parents drop their children at school on their way to work and are not additional trips;
- Only 68% of children at the proposed school are expected from within the proposed development although we have assumed 85% of the vehicle movements for the purposes of the model. However, the new trips from the development and also those from the existing urban area will reflect a double counting of trips to the network;
- No account is taken of internal movements within the site itself, hence Hamilton Lane (south of Keyham Lane West) shows a higher than anticipated increase, which in practice would be accommodated by the internal routes within the site;
- Travel Planning and particularly School Travel Planning measures (secured through the planning permission) are likely to reduce the level of trips by car, estimated to be a potential reduction of 5% to 10 %; and
- Provision of a bus route through the site is also likely to reduce car trips generated by the development, potentially by a further 5.%. The route 38/38A operated by First Bus could be extended into the site and discussions are underway with the operator about how this could be achieved.

Safety and Congestion near Schools and the Pedestrian Environment

2.8 In addition to those outlined above, a series of measures are being proposed to limit vehicle speeds and improve conditions for pedestrians, especially to ensure safe access to schools. These include;

- Traffic Calming measures to reduce traffic speeds to 20mph along Hamilton Lane and alongside the proposed primary school site entrance;
- Improvements to on-street parking along Keyham Lane West to reduce the delays to traffic and buses on this route;
- New Romney Crescent – traffic calming adjacent to Scraptoft Primary School to reduce speeds to 20mph. This could include narrowing of the carriageway along New Romney Crescent together with the provision of parking bays to help calm traffic along this route and ease pedestrian crossing movements;
- Improved footways on Hamilton Lane and between the site and Scraptoft village and surrounding areas to promote walking and cycling;
- Where traffic is deemed too high for pedestrians to safely cross roads, new pedestrians crossings will be provided. At the moment, this is only likely to include Scraptoft Lane and Hamilton Lane;
- Safety improvements could also arise from reconfiguring the existing one-way route within Scraptoft Village and deterring traffic movements through the village centre.

2.9 Other locations are being kept under review and should a need arise for additional measures then these can be implemented in response to specific requirements. The provision of pedestrian crossings follows the standards within Department of Transport Guidance LT1/95.

Air Quality

2.10 Air quality at locations alongside the proposed development have been assessed and are shown in Appendix 2 Plan 1. This information is based on the results of the traffic modelling described above, and the same provisos to the results need to be taken into account i.e. that the traffic modelling represents a 'robust' assessment and significant reductions in traffic generated by the development are likely to occur in practice against assessed pre-mitigation modelled effects.

2.11 Detailed air dispersion modelling has been undertaken, and the results have been assessed in accordance with guidance from Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM). The air dispersion model ADMS (CERC, Version 4.1) has been used to assess the potential impacts at existing sensitive receptor locations (ESR). The air dispersion model has been used to predict NO2, PM10 and PM25 concentrations as these are the pollutants considered most likely to exceed the objectives and limit values. In the results we have compared the 2031 future year without and then with the development.

2.12 In total we have assessed twelve representative ESR locations. These all reflect residential locations close to the site where the greatest impacts are likely to occur and all locations have been agreed with Harborough District Council. The locations are shown in the Plan at Appendix 2 and listed in Appendix 2 Table 1.

2.13 Our provisional assessment of air quality changes as a result of the development are shown in Appendix 2; Table 2 for NO2, Table 3 for PM10 and Table 4 for PM25.

2.14 Table 2 shows that for 6 ESRs the results of the change are 'negligible'. At 6 locations, the results are 'slight' with percentage increases between 5.75% and 8.88%. The location where slight change is predicted are:

- ESR 2 – at the proposed junction of New Romney Crescent, Hamilton Lane and the southern site entrance;
- ESR 4 – the junction of Hamilton Lane/ Main Street and Scraptoft Rise
- ESR 7 – the junction of Scraptoft Lane/Station Lane/Road
- ESR 8 – the junction of Scraptoft Lane and New Romney Crescent
- ESR9 – A47
- ESR10 – A47

2.15 Table 3 and 4 show that for PM10 and PM25 the effects of the development are negligible at all 12 ESRs.

The Village Character

2.16 The TA results indicate that projected traffic increases during peak hours within the village show both a marginal increase on some routes and a marginal decrease on others in the 'With Development' scenario. The level of traffic increase within the village would be slight when compared with the 'No Development' scenario and would not materially affect the character of the village.

Historic Environment

2.17 As discussed above, the TA results show that the increase in traffic within the village when compared with the 'No Development' scenario would be slight and therefore would not materially affect the character of the Historic Environment.

Residential Living Conditions

2.18 The TA demonstrates that the proposed development will not have an unacceptable impact on the highway network or safety and will not result in a cumulative impact which is 'severe' in the context of the NPPF. The results of the air quality assessment demonstrate that changes arising because of the development will mostly be 'negligible'. No material impact to the village character or historic environment are considered to occur as a result of the proposed development. Consequently, it is not considered that there will be any material impact to the living conditions of residents.

8.5 What mitigation measures are realistically capable of being put in place through a development scheme on this site, and what mechanisms would be employed?

2.19 We understand this question primarily relates to the traffic impacts and mitigation to accommodate those impacts. We are working with Harborough District Council and Leicestershire County Council and Leicester City Council, as the highways authorities, to identify and agree the scope of the mitigation that will be required. As outlined above, modelling has been carried out by Leicestershire County Council in conjunction with, and to an agreed scope with Leicester City Council. The modelling shows which junctions will need to be improved and schemes for the improvements are all feasible and preliminary proposals are being drawn up for agreement. This will allow the schemes to be agreed, costed and their implementation programmed.

2.20 The mechanism to deliver the mitigation of the highway works is not unusual in circumstances where the impacts are also within a neighbouring authority. One potential mechanism is for the owner to covenant through the Section 106 agreement to pay the district council the required sums for the agreed works to transfer these to Leicester City Council as highway authority where the impacts are within that authority's area and that authority proposes to implement the proposals. Another option would be to agree the scope of works and for the authority to control through Grampian Conditions and then subject to Section 278 Highways agreements. In either approach, the mechanism is well tried and tested and we don't envisage an issue in delivering the appropriate highways mitigation contributions / works associated with the proposals.

8.6 What are the factors, including on-and off-site infrastructure provision and market-related build-out rates, that would influence the start date and the rate of housing delivery from this site and what are the risks to delivery?

2.21 Harborough District Council's proposed trajectory for the Scraptoft North SDA identifies completion of 94 dwellings in 2021/2022. The emerging master plan we are preparing for the site identifies a first phase of development to be served from both Hamilton Lane to the west of the existing village, and off Beeby Road, to the east. This would potentially allow for more than one developer to be on site at any given time, meaning that a faster build out rate can be achieved.

2.22 We are aiming to submit the applications in the autumn of 2018 and for determination in the spring/summer **(assuming June)** of 2019. This would provide **an estimated 34 months** from planning approval to completion **(April 2022),** which we consider to be sufficient.

2.23 Assessments are still being undertaken but we are not currently aware of any infrastructure constraints that would delay or hold back achieving this programme or indeed sustaining the rates of build-out identified in the trajectory. Mitigation measures to accommodate the highways impacts are being agreed with the authorities.

2.24 The local Scraptoft housing market area is attractive to housing developers, as is evident in the recent schemes at Hamilton Leys and Bellway Homes' 'Goodridge' development alongside the village, as well as previously developed schemes within the village by developers Persimmon Homes and Davidson Developments. Current market absorption rates are good, and we expect rates to be similar at Scraptoft North SDA.

2.25 We consider the risks to delivery to be relatively low. Although the delivery of part of the first phase requires de-designation of the Local Nature Reserve (LNR), and this may be a potential risk. However, the Council has advanced its work to de-designate the LNR, and we have undertaken detailed surveys of the existing site that allow its value to be assessed. The Council has taken a decision to de-designate the LNR subject to a satisfactory planning approval for development of the site, so we see the risks as low.

8.7 Is it necessary to include social infrastructure trigger points in the Policy. Are the thresholds for the provision of the school and social facilities appropriate and what provision is made for residents prior to those thresholds being reached?

2.26 We do not consider that it is necessary for trigger points to be specified by the Policy as these can be better identified and secured through the planning application which may also allow flexibility for the development to respond to any change in circumstances which may arise.

2.27 In response of the interim period between development starting and provision of facilities as part of the development, the site benefits from being in a sustainable location with good access to the existing village and its existing facilities which includes a newsagent, convenience / general store and a post office, a good quality recently developed community hall (which is due to be expanded), church, and a sports pitch and the memorial park.

8.8 What should the strategy for the bus service look like (having regard to Leicester City Council's request for a strategy for removing bus pinch points in the city and providing infrastructure)?

2.28 The Scraptoft area and north eastern parts of the city are well-served by buses. We have discussed extending bus services into the proposed Scraptoft North SDA with bus operators. The most logical bus route extension would be the Service 38/38A, which currently has a route from and to the city centre and along Humberstone Road, Tennis Court Drive, Netherhall Drive, New Romney Crescent and passes along Hamilton Lane and Scraptoft Rise within Scraptoft village. Other services include the Arriva Services 53/53A, 55 and 56.

2.29 We expect there to be a requirement to provide a Public Transport Strategy as part of the planning application process and for this agreed prior to occupation of the development.

This would identify the range of measures necessary to service to the site and may include appropriate bus infrastructure improvements within the relevant city network serving the site.

8.9 What planning purpose would the new Green Wedge fulfil? Would it be an adequate replacement? Is it appropriate for a school and its grounds, a cemetery, and built recreational development?

2.30 Our view is that the 'Green Wedge' would maintain both a perceptible and a physical degree of separation between the existing edge of the urban area of the city and Scraptoft village. We consider that it will be an adequate replacement as the setting of the Village would also be protected to the north by the proposed Scraptoft Brook Valley Park, which is proposed through the mitigation strategy for the loss of the Local Nature Reserve (which the Council has consulted on in parallel with the Local Plan process and in consultation with the County Council's ecological advisor).

2.31 We also believe that the objectives for achieving both a perceptible and physical degree of separation could be achieved through the master planning of the SDA site without the need necessarily for the 'Green Wedge' designation. For example, we consider that the 'Green Wedge' objectives would not be compromised by development of a school within and that there are many precedents for inclusion of schools within 'Green Wedge' areas (and indeed Green Belts), without their objectives being compromised. The perceptible and physical separation would be maintained as school building might occupy 5% of the proposed Green Wedge area[4].

2.32 The use of this land as a school would also secure long-term uses for the land well beyond the Plan period and therefore provide reassurance to the local community on the ongoing positive management of the land while maintaining the physical and perceptible degree of separation which is being sought.

2.33 We also believe it is important that the 'Green Wedge' land should provide more than just an abstract benefit to the local community and that the tangible benefits which would result from the bringing the land into 'community use' would be significantly more worthwhile than the current situation where the much of the existing 'Green Wedge' is characterised unkempt horse paddocks and unmanaged fallow scrub fields which are inaccessible to the public.

8.10 The Policy does not appear to tie the provision of the replacement golf course to the development of site SC1; is it necessary to do so?

2.34 We do not consider that the proposed new replacement golf course at Houghton on the Hill needs to be tied to Site SC1 through the Policy. Golf courses, along with tennis courts and bowling greens, are expressly excluding from the definition of 'playing pitches' in the Sport England planning policy statement[5] and therefore there is no requirement to follow the policy and secure a replacement of similar characteristics, as there is with the loss of playing pitches.

2.35 However, as outlined above, it is not the intention in this case the Golf facility is 'lost'. Rather a new and improved facility would be provided in relative close proximity to the

[4] The Green Wedge area is 8.4ha and the school building footprint is 0.4hectares = 4.76%

[5] A Sporting Future for the Playing Fields of England – Sport England

existing site. In relation to this, work is progressing apace with the planning and design of the new golf course at Houghton on land which is owned by Parker Strategic Land. Currently, it is anticipated that a planning application will be prepared for submission in parallel to that for the Scraptoft SDA in the Autumn of 2018.

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Appendices

Appendix 1 – Transport Assessment

Table 1: Trip Generation Rates

	AM Peak			PM Peak		
	Arrivals	Departures	Two-way	Arrivals	Departures	Two-way
Residential	229	694	923	590	350	940
Primary School	26	18	44	1	2	3
Total	255	712	967	591	352	943

Table 2: Predicted Traffic Movements on Local Road Network (two-way)

Road	2018 Existing Base		2031 Predicted Future traffic movements (including Committed & Background Growth) No Development		2031 Proposed Future traffic movements with Development		Predicted Change (2031 comparison)	
	AM	PM	AM	PM	AM	PM	AM	PM
Hamilton Lane (South of Keyham Lane West)	646	699	719	740	1111	966	+392	+226
Keyham Lane West	288	305	322	347	561	553	+238	+206
New Romeny Crescent	162	184	186	212	492	386	+306	+174
Hamilton Lane (South of New Romney Crescent)	562	635	619	669	771	617	+152	-52
Main Street (one-way)	417	256	469	191	487	239	+18	+48
Scraptoft Rise (one-way)	442	184	525	255	554	375	+29	+120
Stocks Road (one-way)	72	41	102	47	52	32	-50	-15
Church Hill (one-way)	593	548	667	501	695	529	+28	+28
Beeby Road (North of Church Hill)	486	528	553	614	543	439	-10	-175
Scraptoft Lane (west of New Romney Crescent)	564	667	726	836	1063	1120	+337	+284
Station Road (North of A47)	914	873	1015	875	1140	994	+125	+119
A47 Uppingham Road (West of Station Road)	1839	1709	2161	1964	2268	2058	+107	+94
A47 Uppingham Road (East of Station Road)	1499	1357	1776	1567	1792	1592	+16	+25

Appendix 2 – Air Quality

Plan : Location of ESRs

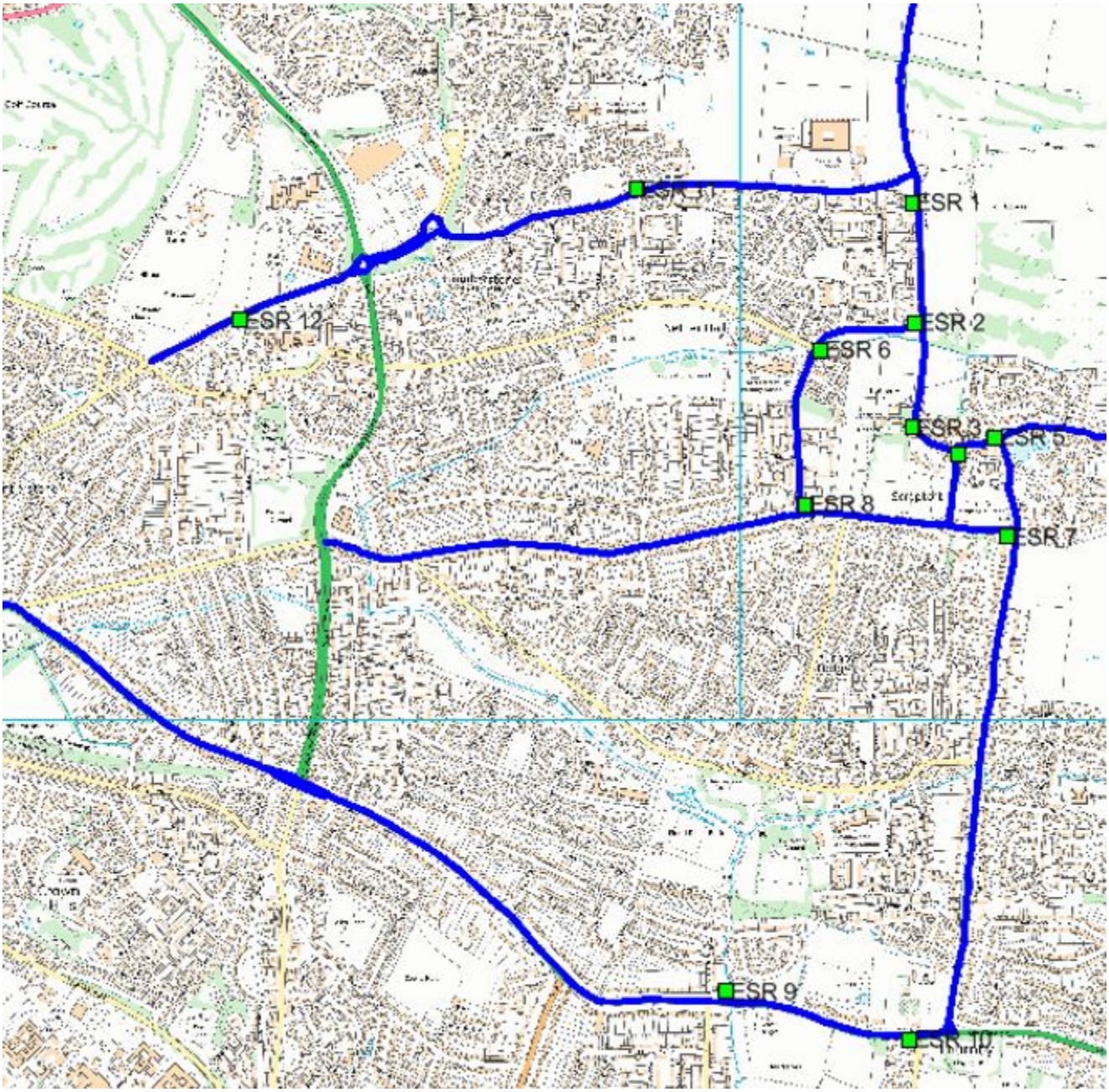

Table 1: Existing Sensitive Receptor Locations					
Receptor	Address	Grid Reference		Inside AQMA	Receptor Type
		Easting	Northing		
ESR 1	260 Hamilton Lane	464463	306398	No	Residential
ESR 2	118 New Romney Crescent	464470	306073	No	Residential
ESR 3	Stable Block, Hamilton Lane	464464	305790	No	Residential
ESR 4	Long Cottage, 2 Scraptoft Rise	464587	305720	No	Residential

Table 1: Existing Sensitive Receptor Locations					
Receptor	Address	Grid Reference		Inside AQMA	Receptor Type
		Easting	Northing		
ESR 5	1 Main Street	464687	305765	No	Residential
ESR 6	51 New Romney Crescent	464214	305999	No	Residential
ESR 7	379 Scraptoft Lane	464720	305496	No	Residential
ESR 8	3 New Romney Crescent	464174	305582	No	Residential
ESR 9	534 Uppingham Road	463962	304271	Yes*	Residential
ESR 10	580 Uppingham Road	464457	304140	No	Residential
ESR 11	58a Keyham Lane	463717	306433	No	Residential
ESR 12	39 Hanover Close	462646	306079	No	Residential
* Inside Leicester AQMA					

Table 2: Changes in NO_2 concentrations for 2031 future year with and without the Proposed Development						
NO_2	2031 Without Development	2031 With Development	As % AQAL	Change	% Change	Impact
ESR 1	18.56	19.58	48.95	1.02	2.55	Negligible
ESR 2	18.99	21.33	53.33	2.34	5.85	Slight
ESR 3	18.58	20.11	50.28	1.53	3.83	Negligible
ESR 4	19.44	22.79	56.98	3.35	8.37	Slight
ESR 5	18.92	20.54	51.35	1.62	4.05	Negligible
ESR 6	18.89	20.77	51.93	1.88	4.70	Negligible
ESR 7	19.37	21.67	54.18	2.30	5.75	Slight
ESR 8	19.59	22.99	57.48	3.40	8.50	Slight
ESR 9	19.90	22.25	55.63	2.35	5.88	Slight
ESR 10	20.79	24.34	60.85	3.55	8.88	Slight
ESR 11	19.24	21.39	53.48	2.15	5.38	Negligible
ESR 12	19.38	21.24	53.10	1.86	4.65	Negligible

Table 3: Changes in PM_{10} concentrations for 2031 future year with and without the Proposed Development						
PM_{10}	2031 Without Development	2031 With Development	As % AQAL	Change	% Change	Impact
ESR 1	13.68	13.73	34.32	0.05	0.13	Negligible
ESR 2	13.74	13.85	34.63	0.11	0.27	Negligible
ESR 3	13.53	13.62	34.06	0.09	0.23	Negligible
ESR 4	13.66	13.79	34.48	0.13	0.33	Negligible
ESR 5	13.60	13.66	34.14	0.06	0.15	Negligible
ESR 6	13.60	13.68	34.21	0.09	0.22	Negligible
ESR 7	13.65	13.72	34.29	0.06	0.15	Negligible

Table 3: Changes in PM_{10} concentrations for 2031 future year with and without the Proposed Development						
PM_{10}	2031 Without Development	2031 With Development	As % AQAL	Change	% Change	Impact
ESR 8	13.70	13.83	34.57	0.13	0.31	Negligible
ESR 9	13.61	13.63	34.08	0.02	0.04	Negligible
ESR 10	13.74	13.76	34.41	0.02	0.06	Negligible
ESR 11	13.64	13.71	34.27	0.07	0.18	Negligible
ESR 12	15.05	15.09	37.72	0.03	0.08	Negligible

Table 4: Changes in $PM_{2.5}$ concentrations for 2031 future year with and without the Proposed Development						
$PM_{2.5}$	2031 Without Development	2031 With Development	As % AQAL	Change	% Change	Impact
ESR 1	9.93	9.96	39.84	0.03	0.11	Negligible
ESR 2	9.97	10.03	40.11	0.06	0.24	Negligible
ESR 3	9.93	9.98	39.94	0.05	0.20	Negligible
ESR 4	10.01	10.08	40.32	0.07	0.29	Negligible
ESR 5	9.97	10.00	40.01	0.03	0.13	Negligible
ESR 6	9.97	10.02	40.07	0.05	0.19	Negligible
ESR 7	10.00	10.04	40.14	0.03	0.14	Negligible
ESR 8	10.03	10.10	40.39	0.07	0.27	Negligible
ESR 9	10.09	10.10	40.41	0.01	0.04	Negligible
ESR 10	10.20	10.21	40.84	0.01	0.05	Negligible
ESR 11	10.01	10.05	40.18	0.04	0.16	Negligible
ESR 12	10.02	10.04	40.15	0.02	0.07	Negligible