

Scraptoft Neighbourhood Plan Review

Consultation Statement

February 2026

Introduction

This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012. Section 15(2) of Part 5 of the Regulations sets out what a Consultation Statement should contain. According to the Regulations, a Consultation Statement:

- a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- b) explains how they were consulted;
- c) summarises the main issues and concerns raised by the persons consulted;
- d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Plan.

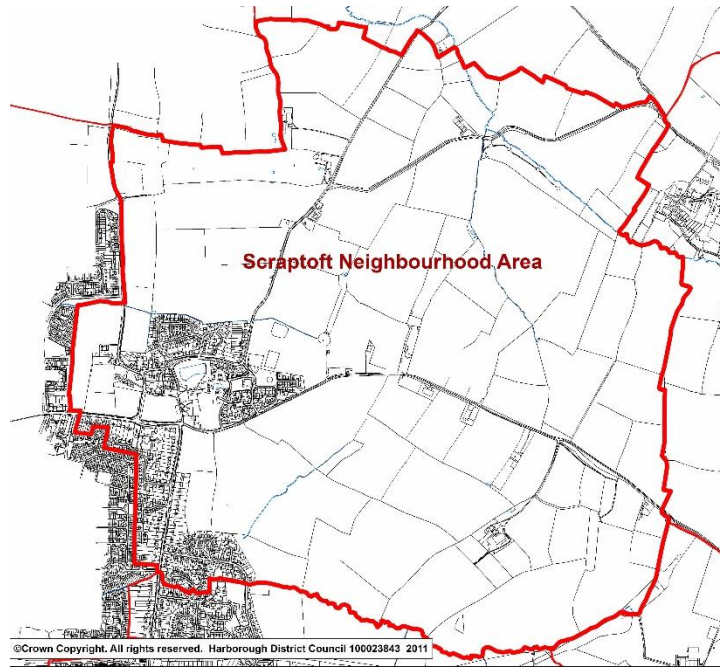
The purpose of this document

This document provides a record of the engagement that took place regarding the Scraptoft Neighbourhood Plan review. The main methods used to publicise the engagement process are also documented, along with the main findings from the engagement.

The Scraptoft Neighbourhood Plan passed Referendum on 11 February 2016 with a vote in favour of 94% with a turnout of 29.6%. This consultation statement has been updated to take into account engagement activities during the course of the preparation of the Review document.

A formal engagement period provided members of the public and other key stakeholders an opportunity to submit comments on the proposed neighbourhood plan area and proposed neighbourhood planning body for Scraptoft Parish. The proposed neighbourhood planning body was identified as Scraptoft Neighbourhood Plan Steering Group with support from Scraptoft Parish Council and the neighbourhood planning area is shown in Fig 1.

Figure 1 Neighbourhood Area



Regulations and Government Guidance:

Stage 1: Defining the Neighbourhood

The local community was required to decide how they intended to work together to undertake the production of the Neighbourhood Plan. Scraftoft is a 'parished' area therefore, the Parish Council has led on the neighbourhood planning process.

The Parish Council applied to the local planning authority to designate the neighbourhood as identified above.

Harborough District Council confirmed that the application was appropriate and undertook the appropriate notification process.

Stage 2: Preparing the Plan

The Parish Council was engaged in order to pull together and prioritise their early ideas and start to draw up their plans.

The Parish Council ensured that the preparation of the Plan was:

- Generally, in line with local and national planning policy framework;
- In line with other legal frameworks;
- Mindful of the need to contribute to sustainable development;
- Prepared on the basis of sound governance arrangements.

The Scraftoft Parish Neighbourhood Plan seeks to establish specific and local planning policies for the development and use of land in the Parish. The Neighbourhood Plan establishes policies to meet local need taking into account strategic planning policies, the data gathered through community engagement and consultation alongside demographic and socio-economic data.

The decision to undertake a formal review of the Neighbourhood Plan was taken by Scraftoft Parish Council during 2024.

Consultation Methodology

The consultation aimed:

- To inform as many people as possible of the review of the Neighbourhood Plan and give all interested parties the opportunity to contribute to the process.
- To engage with all residents and landowners in the Neighbourhood Area to explore opportunities to influence all new development in the Parish.

Activities:

Original Neighbourhood Plan

Extensive consultation was carried out for the original Neighbourhood Plan and the full details can be found in Scraftoft Parish Consultation Statement (Neighbourhood Plan 2016).

Neighbourhood Plan Review

- The Neighbourhood Plan has been included as a regular agenda item at Parish Council meetings. Minutes of meetings are publicly available on the Parish website;
- Dialogue was maintained with Officers from Harborough District Council as the Neighbourhood Plan progressed;
- Letters and notifications have been sent out to residents via the TABS newsletter to gauge support for the retention of existing policies and the development of new policies in the Scraftoft Neighbourhood Plan Review;
- The Neighbourhood Plan Steering Group met in October 2024, January 2025, May 2025 and August 2025 and also kept up correspondence via email. Notes from these meetings are provided separately. Two village walks took place, one with the Aecom consultant for the Design Code and another with the Environment Consultant to view and discuss OSSRs and Important Views;
- A staffed exhibition about the Neighbourhood Plan was held on 30 November 2025. At this event people were asked to give their thoughts and ideas on the emerging policies. The event was extensively publicised by posters in the noticeboards, newsletters delivered to households, the parish council website (<https://www.scraftoftparishcouncil.gov.uk/news/2025/11/scraftoft-parish-council-neighbourhood-plan-public-consultation-event>) and via social media. The analysis of this event is included in the submission material;
- Agencies with a statutory or other significant interest in the NP Review were invited to submit their comments in writing by email or letter, at appropriate stages of the planning process, according to the regulations. The list of Regulation 14 comments and the responses, indicating how the Neighbourhood Plan was amended as a result of the comments is included in the submission material;
- An Executive summary of what had changed since the original NP is included at the front of the NP Review document and this is included in the submission material.

Detailed Consultation Activities

Neighbourhood Plan Review

The Open Event in November 2025 was held to share the emerging policies in the Neighbourhood Plan Review with those who live and work in the parish.

The policies on display received strong support from those who attended – often unanimous support.

Some comments received during the meetings:

Response to Housing Needs Assessment:

“you’re right very comprehensive. my main concern is the high level of affordable housing when those around me are so small no one stops long. what do people consider about flats. housing for seniors is good idea because in theory they will release the 3 and 4 beds. “

Response to Design Code

“My concern would be about the planning for parking. The normal assumption is that off-road parking will include garage space for one, or sometimes two, cars. This would be a fair assumption if the garages were wide enough. On the Goodridge estate there is only one car owner who can fit his car into the garage and he is the owner of a vintage, very narrow Ford Anglia. Otherwise the garages cannot be used as parking space. My request is that future planning regulations dictate that the garage width be wide enough to take an SUV with space enough to open both doors when inside. Failing this, future developments will just store up parking issues and cause traffic congestion.”

On Important Views

“Yes the view from the Goodridge Estate towards Beeby and Keyham is particularly precious; so thank you for including this.”

On OSSRs

“My only comment would be, with the old rugby ground on Covert Lane now under threat from planning, can we make the point a bit more about potential loss of playing fields to developers and the need to keep them as sports facilities. A developer can pay a lot more for them than other sports providers or the parish. Any new pitches must be within Scraftoft and accessible by residents not placed somewhere else e.g. Brooksby College”

Once the Plan was finalised taking on board comments from the Open Event, it was submitted for Regulation 14 consultation between 14 December 2025 and 23 January 2026.

In addition to all local residents, the following groups were contacted and comments sought at Regulation 14 stage:

Consultation body
County Council - Nik Green, Communities and Places Officer, Leicestershire County Council, Nik.Green@leics.gov.uk
District Council - Matthew Bills, Harborough DC M.Bills@harborough.gov.uk
Leicester City Council Grant Butterworth planning.policy@leicester.gov.uk
Adjoining parishes Thurnby & Bushby Beeby Keyham Houghton on the Hill
The Coal Authority, 200 Lichfield Lane, Mansfield, Nottinghamshire, NG18 4RG planningconsultation@coal.gov.uk
Homes England, enquiries@homesengland.gov.uk
Miss C Jackson, Consultation Service, Natural England, Hornbeam House, Electra Way, Crewe, Cheshire, CW1 6GJ consultations@naturalengland.org.uk
Environment Agency, Lower Trent Area, Trentside Offices, Scarrington Road, West Bridgeford, Nottingham, NG2 5FA nick.wakefield@environment-agency.gov.uk or enquiries@environment-agency.gov.uk or lnenquiries@environment-agency.gov.uk
Historic England. 2nd floor, Windsor House, Cliftonville, Northampton, NN1 5BE midlands@HistoricEngland.org.uk
Network Rail Infrastructure Limited, Kings Place, 90 York Way London, N1 9AG townplanning.lne@networkrail.co.uk info@highwaysengland.co.uk
British Telecommunications Plc, gssb@bt.com
East Leicestershire and Rutland CCG, Suite 2 and 3, Bridge Business Park

674 Melton Road, Thurmaston, Leicester, LE4 8BL llrccgs.enquiries@nhs.net
FAO Mr D Holdstock, National Grid, AMEC Environment & Infrastructure UK Limited, Gables House, Kenilworth Road, Leamington Spa, Warwickshire, CV32 6JX nationalgrid.uk@avisonyoung.com
Not Avison Young any longer. ngplanning@fishergerman.co.uk
British Gas Properties, Aviary Court, Wade Road, Basingstoke Hampshire, RG24 8GZ new.connections@severntrent.co.uk
spatialplanning@anglianwater.co.uk dsweetland@anglianwater.co.uk
Voluntary Action Leicestershire admin@vasl.org.uk
Roy Holland. Age UK Leicestershire and Rutland roy.holland@ageukleics.org.uk
CPRE info@cpreleicestershire.org.uk
Leicestershire Ethnic Minority Partnership Prakash@lemp-leics.org.uk
Federation of Gypsy Liaison Groups info@gypsytravellerfederation.org
Interfaith Forum for Leicestershire equality@leics.gov.uk
Local Church via web form
Market Harborough Chamber of Commerce. http://www.harboroughchamber.co.uk/
Leicestershire Centre for Integrated Living. 5-9 Upper Brown Street, Leics, LE1 5TE www.lcil.org.uk
Harborough District Disability Access Group. Nick Williams. hddag@hotmail.co.uk
Leicestershire Police, Force Headquarters, St Johns, Enderby, Leicester, LE19 2BX
Leicestershire Fire and Rescue, 12 Geoff Monk Way, Birstall, Leicester LE4 3BU
Executive Director, Seven Locks Housing, 1a Anson House, 8 Compass Point, Northampton Road, Market Harborough, Leicestershire, Now Platform Housing
MP: Alicia Kearns
County Councillor: Simon Galton
District Councillor: Amanda Burrell
Scraptoft Golf Club BBM Garage, Scraptoft Business centre via webform Scraptoft Day Nursery Aylestone St Jame Rugby Club Wayside Lodge Equestrian Co-op Main Street
Leicester City Council Bloor Homes on behalf of Scraptoft Lodge Farm Will & Nelson Renner Scraptoft Hill Farm Jelsons Parker Strategic Land

General

Throughout the Plan's development we have liaised with Officers from Harborough District Council to ensure that emerging Policies are in general conformity with the existing and emerging Local Plan policies.

The Neighbourhood Plan Review has taken into account the latest evidence of housing need used in preparation of the Local Plan.

The draft Neighbourhood Plan (Review version) is now ready to be submitted to Harborough District Council who will publicise it for a further six weeks and then forward it, with accompanying documents and all representations made during the publicity period, to an Independent Examiner who will review it and check that it is in compliance with the 'Basic Conditions'.

The Examiner will discuss the significance of the modifications within the Review version of the Neighbourhood Plan compared to the original Neighbourhood Plan with Harborough District Council before a decision is taken about the need for a Referendum.

If needed, the referendum question will be a straight "yes" or "no" on the entire Plan, as set out in Neighbourhood Planning Regulations. At this referendum stage (if it is required) it will not be feasible to vote for

or against individual policies. If 50% or more of the electorate vote in favour of the Neighbourhood Plan Review, it will be brought into force ('Made') and become part of District-wide planning policy.

Conclusion

This Consultation Statement and the supporting Appendices are provided to comply with Section 15(2) of part 5 of the 2012 Neighbourhood Planning Regulations.

Scraptoft Parish Council

February 2026

Appendix 1 Scraptoft Neighbourhood Plan

Notes from Meeting at the Community Hub on 28/10/2024

Present: Ian Bull, Peter Elliott, Penny Fielden, Gillian Graham, Tim Healey, Gary Kirk, Emma Lee, Lynn Morris

Introductory Discussion

- Aecom are working on a Housing Needs Assessment.
- Wei Deng from Aecom visited Scraptoft on 16 October to take a guided tour of the village and took lots of photographs to feed into the Design Code, which is a report on aspects of the village environment, including buildings, green spaces, etc.
- Discussion about medical facilities, e.g. GPs at Willowbrook have an interest in extending their service to Scraptoft. The Neighbourhood Plan can only support statutory provision so could support additional facilities but it would be up to the GPs to fulfil the service.
- If there are no significant changes to the original Neighbourhood Plan, it may not need to go to a referendum.
- Neighbourhood Plan examiners' guidance is not to re-examine an unchanged policy so the recommendation is not to introduce changes to existing policies unless they need to be updated.

Scraptoft Neighbourhood Plan Policies Review

- S1 Housing provision – this needs to be updated, largely dependent on the Housing Needs Assessment from Aecom and also to establish the settlement boundary.
- S2 Land to East of Beeby Road – policy now redundant as Bellway's Estate built.
- S3 Housing Mix – policy needs strengthening and housing mix will be identified in the Housing Needs Assessment from Aecom.
- S4 Affordable House – current policy gives priority to people with a local connection. Suggested the new plan expand on this and look at the First Homes scheme, percentages of affordable housing in new developments and conditions to see affordable homes spread throughout the development (instead of being concentrated in one place).
- S5 Landscape Protection – policy to be replaced by biodiversity and heritage policies and specifically name areas because the current policy is too general.
- S6 Green Wedge
- S7 Areas of Separation – these two policies have worked well for Scraptoft and it was agreed to keep them, subject to their alignment with the Harborough's new Local Plan.
- S8 Countryside – policy to be updated and merged with the limits to development and settlement boundaries
- S9 Local Green Space – existing policy powerful but needs rewording to include names of green spaces.
- S10 Design – Aecom's Design Code will form the basis of this policy.
- S11 Biodiversity – needs updating. Next meeting with Gary Kirk's colleague John Martin to draft.
- S12 New Community Hall – this policy is now obsolete.
- S13 Allotments – Developers at Pulford Place creating allotment provision for Scraptoft, policy needs to protect this provision (but only from a planning viewpoint; management of the allotments will be a separate issue).
- S14 Infrastructure – e.g. school places, healthcare – needs updating.
- S15 Parking spaces for new builds – Gary Kirk to check current Highways guidance and update if necessary.

Potential Additional Policies

- Residential allocation – this worked well with the last plan where the steering committee identified what is now the Bellway's development as a development area. Gary Kirk to send template letters for consideration to send to landowners or put in newsletter to identify pockets of land for potential developments.
- Settlement Boundary – Gary Kirk to draft.
- Development Conditions – could have a policy regarding development in back gardens. Gary Kirk to draft.
- Non-designated Heritage Assets – this could reinforce the conservation area by naming specific buildings e.g. cottages.
- Flooding – it was agreed this was necessary. Gillian Graham, Flood Warden to have input.

- Renewable Energy – agreed to include.
- Important Views – agreed to consider and list 10 – 12 views, e.g. Scraptoft Hall, vista on Covert Lane to Keyham, etc.
- Open Spaces – agreed to include spaces Harborough had identified and consider including others, e.g. rugby fields (Jimmy's).
- Protect Existing Community Facilities, e.g. pub, post office, nursery on Scraptoft Lane, village hall, community hub, etc.
- Schools – not applicable as Scraptoft does not have any schools.
- Electric Vehicles – Gary Kirk to put forward a suggested policy.
- Working farms – only one in Scraptoft. The purpose is to avoid the situation in Hungarton where a farm was converted to a chicken farm to the detriment of the village.
- Broadband – agreed to include as signal low in and around the church and could include the condition for new housing to have superfast broadband. Would also support people working from home.

Next Steps

- Gary Kirk to provide template letters (see Residential Allocation).
- Meeting to be set up with Gary Kirk's colleague John Martin to come and talk through Environmental aspects and policies. The church's Eco Group to be invited. Gary Kirk to forward some suggested dates.

Appendix 2 Scraftoft Neighbourhood Plan

Notes from Meeting at the Community Hub on 29/01/2025

Present: Ian Bull, Peter Elliott, Penny Fielden, Gillian Graham, Gary Kirk, Sadik Karolia, Emma Lee, John Martin, Lynn Morris, representative from the Church Eco Group
Apologies: Tim Heatley, Simon Galton

Purpose

John Martin briefly talked each of the Environment Policies in the Environmental Chapter Framework (circulated previously and attached to this email for reference) to highlight which policies needed more local input and to request volunteers.

Introduction

The Environmental Policies will be written with regard to Harborough District Council's Local Plan for which the consultation document is due to be published on 17 February – HDC are coming to Scraftoft Community Hub on 19 March 4-7pm with the Local Plan – and the new National Planning Policy Framework. The introduction will include Topographical and Geological maps of Scraftoft.

Policy 1 Area of Separation/Green Wedge

- There needs to be a firmer distinction between areas of separation and green wedge since more protection is given to areas of separation.
- The policy needs to wait for the HDC Local Plan so the Neighbourhood Plan doesn't conflict and will therefore be uncontentious with HDC once written.

Policy 2 Local Green Spaces

Local Green Spaces are irreplaceable and fixed locations. The list of these are to be discussed and formed alongside Policy 3.

Policy 3 Open Space, Sport & Recreation Sites (OSSR)

- There were no OSSRs in the original Neighbourhood Plan.
- Volunteers sought to create a list. Lynn Morris has already volunteered.
- John Martin will brief the OSSR subgroup on methodology after the HDC Local Plan has been published.
- Proposed a day time walk around the village to suggest possible sites.

Policy 4 Sites and Features of Natural Environment Significance

- Need to identify plots of land with biodiverse significance within the village which could be woodland, scrubland, permanent pasture e.g. Scraftoft Hill Farm, paddocks, etc.
- The Church's Eco Group studied the churchyard using a phone app which might be a useful starting point.
- Is there anyone locally with in-depth knowledge or a local member of the Wildlife Trust? Volunteers sought.
- The policy will include the new biodiversity net gain where developers have to increase by 10% the biodiversity of a site, however, this need not be on the development site but could be elsewhere in the village.
- New Neighbourhood Plan policy will also protect existing hedges/trees in a new development.
- New Neighbourhood Plan policy will also include bat protection which will include plans for artificial lighting on new developments with regard to illuminance levels, zonation, luminaire specifications, dark buffers, curfew times, site configuration and screening along with only having exterior artificial lighting where demonstratably essential.

Policy 6 Sites and Features of Historic Environment Significance

- Policy taken from Leicestershire Historic Environment records.
- Volunteers needed to identify other sites.

Policy 7 Non-designated Heritage Assets

- Buildings not on the Historic England Register, i.e. outside of the conservation area. Need to use Historic England's rationale to justify inclusion.

- If proposing a property, will need to let the property owner know as policy could restrict any changes to that property. John Martin has a template letter that could be used.
- Volunteers requested to decide on a list, send the template letter if required and log responses.

Policy 8 Ridge and Furrow

- This is not a statutory protection but could stop a developer building on a site.
- John Martin to produce a map and check sites with a volunteer to update the 2000 map.

Policy 9 Important Views

- John Martin thought this could be a job for one person to list the views, describe each view and take photographs.
- Views suggested so far (this list is a starting point and additions can be made):
 - View to Scraftoft Hall from Church Hill/Edith Cole Memorial Park
 - View to Scraftoft Hall from Letitia Avenue
 - View from Covert Lane to fields on Station Lane
 - View from Goodridge (Bellways) out towards Beeby (within Scraftoft)
 - View from Dandelion Lane towards Mount Woodland.

Policy 10 Flood Risk Resilience and Climate Change

- Needs to be site specific and can include surface water as Scraftoft is mostly clay so water tends to run off. Local detail required to complete.
- Environment Agency were updating the flood maps and predictions which will be included in the new policy.
- Gillian Graham, Flood Warden, to assist. Photographs from recent flooding affecting Cranbrook Springbrook and Pulford Drives to be obtained from Simon Galton.

Policy 11 Renewable Energy Generation Infrastructure

It was agreed to include this policy to identify specific sites suitable for renewable energy (wind turbines, solar panels, etc) as this would enable the Neighbourhood Plan to include restrictions on e.g. turbine height/size and include protection for sites of environmental significance. Identifying specific sites would also protect them from housing development.

Next Steps

- If anyone wishes to volunteer to assist with a specific policy or policies, please let Emma Lee know by 5 February's parish council meeting.
- Meeting in the foyer at the Community Hub for 10am on Saturday 22 February and then a walk around the village to assist with identifying sites/views.
- Meeting in March (date yet to be decided) to discuss the Housing Needs and Design Code policies AECOM have been working on. The Housing Needs Assessment is complete and the Design Code close to completion.

Appendix 3 Scraftoft Neighbourhood Plan

Notes from Neighbour Plan Meeting 6 May 2025

Present: Ian Bull, Peter Elliott, Emma Lee, John Martin

Apologies: Tim Heatley, Sadik Karolia, Lynn Morris,

Environmental Policies

John Martin thanked all who had contributed. The bulk of work has been done, however, there were some areas John sought clarification on.

Existing Environmental Designations (see page 3 of Environmental Draft April 2025)

John asked about approaching local landowners to identify parcel(s) of land that could be used for Biodiversity Net Gain (BNG). Suggested the Local Nature Reserve. Peter to talk to a couple of local landowners which John will follow up.

Policy 3 OSSRs

- Confirmed that all of the Scraftoft Lake area is owned by the management company for the Scraftoft Hall Estate
- Agreed that a narrative will be added to the Field owned by Parker Strategic Land between Mount Woodland and Jimmies to safeguard this for future sports use, especially in view of plans from Jelsons/Davidsons (Covert Lane) and Bloor homes (land between Goodridge estate and Beeby) to build new estates in Scraftoft and the future need for spaces suitable for sports.
- Emma to send John the photos used in the OSSRs document (actioned via WeTransfer).

Policy 6 Statutorily Protected Heritage Assets

Currently the list is in the policy document but will be moved to a supporting document/appendix.

Policy 7 Non-designated Heritage Assets

Agreed there were no further additions.

Policy 8 Ridge and Furrow

Agreed the sites identified on Figure X.3: Ridge and Furrow 2025. Peter whether the area of one of the sites needed extending. John to check.

Policy 9 Important Views

Completed but may need to modify the Scraftoft Lane East Junction to accommodate the proposed development on Covert Lane from Jelsons/Davidsons. The proposed site has an area of separation so the view can still be accommodated.

Policy 10 Flood Risk Resilience and Climate Change

- Peter to provide photos and descriptions of recent flooding given to Cllr Simon Galton to John.
- Policy allows for the surface water from the proposed new developments so incorporates some future-proofing.

Policy 11 Renewable Energy Generation Infrastructure

Agreed that at consultation stage, a display board and map with questionnaire will be used to gauge local opinion and incorporate questionnaire answers into the policy.

Housing Policies

- Agreed there was no need to identify reserve sites for small residential developments since there will only be a few months between the Neighbourhood Plan being finalised and the new Harborough District Council Local Plan which would supersede any identification of such sites.
- The settlement boundaries were agreed.
- Housing mix policy drawn from Aecom's Housing Needs Assessment.
- Affordable housing will be indistinguishable from other housing stock and will be spread throughout developments instead of concentrated in one place.
- Priority will be given to local people, e.g. young people who grew up in the village or older people looking for more appropriate housing for their needs with a local connection.
- Windfall sites will only be approved if it doesn't diminish available parking and retains garden space.
- New developments will need to be clear that they have referred to the Design Code Aecom drafted.

Next Steps

- Gary to create new chapter for Sustainability, Transport, Medical facilities, etc. and product draft policies informed by census data. This will draft will be distributed to be considered at a future meeting – probably June/July – to be arranged.
- Question was asked whether a burial site needed to be identified in the Neighbourhood Plan. Gary agreed to add a general policy in support of a site without allocating a site.
- After the June/July meeting, Gary to check whether it is necessary to send the draft Neighbourhood Plan to Harborough District Council for inspection before the Public Consultation event which will be held in the Community Hub.

Appendix 4 Scraftoft Neighbourhood Plan

Neighbour Plan Meeting 27 August 2025

Present: Peter Elliott, Tim Heatley, Gary Kirk, Emma Lee

Apologies: Ian Bull, Penny Fielden, Sadik Karolia, Lynn Morris,

Housing Chapter

This has been done.

Environmental Chapter

- Section on renewables to be completed after the public consultation
- Peter Elliott and John Martin to discuss Biodiversity Net Gain (BNG) area allocation with farmer who owns the land. Once this is done, the Environmental Chapter will be complete.

Community Sustainability Chapter

- Agreed the list of community facilities to include Community Hub, Village Hall, Play Areas on Mitchell Grove, Goodridge estate and Pulford Place estate, Post Office and Co-op store, Peartree Stores (newsagents and general store on Main Street), Church, the White House pub.
- Agreed could do with a medical centre/pharmacy and facilities for older children.
- Local businesses (including home-based facilities) cover areas in accountancy and business support, couriers, contractors (building/engineering/HVAC), beauty services, day nursery, Natural Burial Ground, equestrian, vehicle air conditioning and maintenance.
- Scraftoft Hill Farm is the only working farm in Scraftoft.
- Broadband is good with 95% of households having 300Mbps ultrafast broadband. Source: broadbandexposed.co.uk

Percentage of the premises in Scraftoft that have Superfast, Ultrafast or Gigabit broadband availability		
% of premises with Superfast Broadband (30 Mbps or faster)	% of premises with Ultrafast Broadband (300 Mbps or faster)	% of premises with Gigabit Broadband (1 Gbps or faster)
100.00%	95.15%	95.15%

- Agreed to remove the paragraph about the village hall site as a potential car park. This arose from the original Neighbourhood Plan which took into account that if the Community Hub was built and the village hall fell into disuse, then potentially the village hall could close, and a car park was a suggested use for the site. However, there is no intention to close the village hall and it is still used for community group hires.
- Agreed the section on Electric car charging. Also agreed that this would not include a provision for converting lamp posts for charging as that may encourage on-street parking in already congested areas.
- In the Infrastructure section agreed that the list of off-site infrastructure requirements should include GP surgery/pharmacy, play areas (particularly for older children) and section should include traffic management.

Next Steps

- John Martin to finalise Environmental Chapter
- Gary Kirk to finalise Community Sustainability Chapter
- Draft Neighbourhood Plan to be finished by end of September
- Once Draft Neighbourhood Plan complete, next stage is the public consultation phase.
- Next meeting to be arranged, likely at the end of September/beginning of October.

Appendix 5

Scraftoft Neighbourhood Plan

Pre submission consultation responses

No .	Chapter/ Section	Policy Number	Respondent	Comment	Response	Amendment
1	General		Anglian Water	"Offering no comments"	Noted	None
2	General		The Coal Authority	"No comments to make"	Noted	None
3	General		Historic England	Generic advice on checking their website and protecting historical assets which the Neighbourhood Plan already seeks to do.	Noted	None
4	General		National Gas	"An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure. National Gas Transmission has identified that it has no record of such assets within the Neighbourhood Plan area."	Noted	None
5	General		NHS Leicester, Leicestershire Rutland Integrated Care Board	"Local primary care services are already under high demand and therefore any additional demand from housing developments will require developer contribution to mitigate this." Would also welcome actions for community cohesion, provision of green space and local recreation activities, new developments to be designed in a way to encourage and enhance physical and mental health, ensure range of options for travel and support	Noted	None

				reduction in carbon emissions to improve health.		
6	Section 3 page 9		Leicester City Council as landowner	<p>“Leicester City Council, as landowner, considers that in relation to the SNSDA [Scraptoft North] the Neighbourhood Plan is not in general conformity to the current Harborough Local Plan 2011-2031 (adopted in 2019), as required by the Neighbourhood Plan itself, and also does not adhere with the requirements in the draft NPPF, 2025. The NP should be amended to allocate the SNSDA housing site in conformity with the adopted Harborough Local Plan.”</p>	<p>The NP does not need to adhere to the draft NPPF. It will be examined against the provisions of the 2024 NPPF.</p> <p>The NP cannot allocate a site that is an allocation in a Local Plan, and in any event, that site has been proved to be undeliverable and has been removed as a strategic allocation and does not feature in the Regulation 19 Local Plan Review.</p>	None
6	Section 4 Page 14		Leicester City Council as landowner	<p>“Leicester City Council’s position, as landowner, is that site SC1 remains allocated in an adopted local plan to which the Neighbourhood Plan must be in general conformity with as noted in 1 above. An initial planning application for the whole site was not determined by Harborough District Council and was withdrawn. An application for up to 190 dwellings on part of the site (Phase 1, with more phases to follow) is due to be submitted shortly. The NP should be amended to allocate the SNSDA housing site in conformity with the adopted Harborough Local Plan.”</p>	<p>The NP is not required to allocate a site where it is in the Local Plan. This is a fundamental misunderstanding about the role of a NP. To suggest that the NP fails to meet the Basic Conditions on this basis is fundamentally wrong.</p> <p>Additionally, the Adopted Local Plan is out of date and carries less weight.</p>	None

6	Section 4 pages 15 and 16	HBE1	Leicester City Council as landowner	<p>"The NP is promoting a Settlement Boundary on page 16 which excludes the Scraftoft North SDA even though that site is included by Harborough District Council (HDC) in its existing adopted Local Plan. The site was allocated on the basis of it being in a sustainable location.</p> <p>An NP which promotes development contrary to the existing Local Plan is fundamentally flawed and must be corrected to align with the existing Local Plan.</p> <p>The NP appears to be attempting to align itself with the emerging Local Plan which proposes to de-allocate the Scraftoft North SDA. This is a flawed and premature position to take as it is assuming the Scraftoft North SDA will be de-allocated. The emerging local plan has little status currently, the deallocation of the SNSDA is subject to challenge and this has yet to be tested at enquiry."</p>	<p>The SDA is no longer an achievable site, hence its withdrawal. It does not feature in the Regulation 19 Local Plan which confirms it is no longer considered a viable site. It is entirely appropriate for the settlement boundary to exclude a site that has been withdrawn and replaced in the Regulation 19 Local Plan with an alternative site.</p> <p>This is an inaccurate statement.</p> <p>We note this position – but it is completely wrong to suggest that the NP has to continue on the basis that the de-allocated site will be reintroduced. This is completely illogical!</p>	<p>None</p> <p>None</p> <p>None</p>
6	Section 4 page 24	ENV1	Leicester City Council as landowner	<p>"The Area of Separation plan at figure 5 (page 24) includes an area in the north-western corner of the coloured area on the plan which surrounds Netherhall Cottages and is included within the area allocated under the current Local Plan as</p>	<p>The Local Plan is out of date and has limited weight. The NP must be based on the latest evidence of housing need, which is described in detail in the</p>	<p>None</p> <p>None</p>

				<p>part of the Scraftoft North SDA. Under the existing Local Plan there is potential for this particular area to be developed for education purposes. The NP is again premature in discounting the proposals in the adopted local plan and apparently seeking to align itself with an un-tested emerging Local Plan of little standing.</p> <p>The NP should be amended to incorporate the SNSDA housing site within the settlement boundary in conformity with the adopted Harborough Local Plan.”</p>	<p>Regulation 19 Local Plan Review.</p> <p>It is therefore entirely appropriate for the NP to align itself with the emerging Local Plan. To do otherwise would have resulted in it failing to be supported at examination.</p> <p>The Local Planning Authority has supported the approach taken in the NP and have raised no concerns.</p>	None
6	Section 4 page 25	ENV2	Leicester City Council as landowner	<p>“The NP is proposing a significant area (c35 acres) of the housing allocation SNSDA from the adopted local plan as a Local Green Space. This appears to be an attempt to prevent development on this site and the designation is not in conformity with the adopted Local Plan as required by the NP itself.</p> <p>The NP should be amended to remove the proposed Local Green Space from the area of the SNSDA housing site in conformity with the adopted Harborough Local Plan.”</p>	<p>The NP’s objective is to protect the biodiversity (especially, as recognised by its Local Wildlife Site designation), social and landscape significance of this site. It can now do this because it, along with the rest of the SNSDA, has been deallocated (see above).</p> <p>The Adopted Local Plan has limited weight as it is out of date and superseded by the Regulation 19 Local Plan.</p>	
7	General		Scraftoft Golf Club	<p>“Leicester City Council have informed us that they will be taking back the 25 acres (25% of our course) that we have</p>	Noted	None

				<p>leased from them for many years. This is for a revised residential development, part of a replacement for the previous Scraftoft North development.</p> <p>It is therefore disappointing that the Parish council have chosen not to recognise the service the Club has provided to the community for nearly 100 years. It hasn't, in our opinion, supported us in our attempt to move to a new purpose built, wholly owned modern facility at Houghton-on-the-Hill.</p> <p>The new course whilst not in Scraftoft Parish area, is only 3 miles away at Houghton and will provide not just a new golf course development but an academy with a driving range, a Par 3 introductory course and hopefully, an adventure golf course. We will be able to provide leisure facilities for all the family as well as improved social activities and increased employment opportunities.</p> <p>To achieve this move, we obviously need to obtain a change of planning to residential development and whilst Scraftoft North, a combination of the golf course and Leicester City's land has proven difficult to deliver, the Club is still trying to</p>		
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			<p>obtain permission on the thirteen holes that we will have left once the City serve notice to terminate our lease.</p> <p>Unfortunately, the Club's future as a 13-hole golf course is in serious doubt and it is unlikely that the Club will be able to continue trading.</p> <p>We believe that, in addition to the City Council's proposed development of 190 homes off Hamilton Lane, the land covered by the golf course could provide a far better, more comprehensive development than the proposals put forward by the Harborough District Council Draft New Local Plan.</p> <p>In addition to the aspects stated above, Scraftoft Golf Club believe it essential that the Parish support the Club's plans to obtain a change of planning to residential development. This will allow a through route from Beeby Road/Keyham Lane East to Hamilton Lane and Keyham Lane West. The only other routes for all of Harborough's proposed allocations will be on existing heavily congested roads and the one-way system through Scraftoft village. The improved traffic management generated by the provision of a road link from</p>		
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				Beeby Road to Hamilton Lane would benefit all residents of Scraftoft. “		
8	General		Houghton on the Hill Parish Council	<p>It was resolved:- To welcome the proposed Area of Separation along the southern boundary of the parish, which would adjoin Houghton's AoS in the referendum version of its NDP.</p> <p>That the Parish Council would welcome specific proposals on walking and cycling transport, particularly the use which could be made of Covert Lane as a link between the communities, in addition to the physical activity and well-being it could promote.</p>	Noted	None
9	General	Comments relate to Davidsons and Jelsons potential planning application for 750 homes on fields on Covert Lane called Scraftoft East	Wayside Lodge Equestrian	<p>Comments in part relate to the public exhibition in Scraftoft Community hub (29th April 2025), but of course are generalizable to any housing developments that encroach upon this area. Our initial concerns include the following:</p> <ul style="list-style-type: none"> The <i>circa</i> 500m border with our field will act as a magnet to children and others keen to interact with our horses. We currently have no such issue since there are no footpaths or other rights of way adjoining the land. We have dealt with this matter at the two field gate access points onto 	<p>Noted.</p> <p>This comment relates to the Regulation 19 Local Plan and not the NP.</p> <p>They should be directed to Harborough District Council.</p>	None

				<p>Covert Lane by building corrals with double gates so that road users cannot interact with the horses at the gateways. Such interaction presents a danger to the public themselves, it is also a significant risk to our stock, even with 'well-wishers' attempting to "just feed and/or pet the horses". There is also a risk of deliberate foul play and harm to our animals. Sad, but seemingly more frequent with reports of acts of animal cruelty widespread.</p> <ul style="list-style-type: none"> • Trespass on our land by walkers/dogwalkers is currently very rare. We think that there would be a significant risk of individuals gaining access if the adjoining land is developed. Some individuals believe, erroneously, in a 'right-to-roam', others just don't care and may feel that they are doing no harm. Dogs present a risk to our stock by 		
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				<p>chasing them and also, dog faeces may commonly contain worms that are hazardous. Discarded or otherwise lost poo-bags even more so. Also, of course, the inevitable problem of other litter dropped or blown.</p> <ul style="list-style-type: none"> • Housing developments not only bring routine noise and other 'everyday' hazards, it also brings particular dangers such as domestically launched fireworks and other frightening loud noises and bright flashing lights that have the potential to considerably scare animals, inducing panic and potentially injury during an attempt to escape. This hazard not only affects horses out grazing but also stabled horses within our barns. Bringing the building line closer will impact upon these too. <p>We would rather not see this land, previously designated as an area of separation, developed. It may simply result in our</p>		
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				<p>business being no longer viable. However, if our concerns are over-ruled, we would appreciate consideration of the following mandatory measures for the developers and for the subsequent owners/householders:</p> <ul style="list-style-type: none"> • We believe that any border should be constructed in such a way that proximity does not facilitate an increased risk to our valuable stock. Even litter thrown or blown into fields containing horses can result in significant harm if swallowed (for example empty crisp packets are attractive due to their saltiness). • The developer might mitigate such risks to our horses by abutting the rear gardens of the new houses along our boundary lines rather than public open/green space or roadsides. While this may afford us better security from trespass, interference and theft, there is a danger that commonly grown garden 		
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				<p>plants that are toxic to horses (e.g. yew, laurel etc.) could be reached if the physical barrier is not sufficient in height and/or width, nor robust enough.</p> <ul style="list-style-type: none"> • Growth of plants in any such border that are poisonous to horses should be banned and this specified in the deeds of the individual properties. • Any such barrier will need to be reasonably future-proof in terms of its decay/deterioration. For example, timber fencing has a limited lifespan and may also be attractive to horses for chewing. Again, the maintenance of a suitable secure boundary should be specified as a responsibility of the property/home owner and this specified in the deeds of said property. • 'Fireworks' should be banned throughout the developed area and this also specified in the deeds of the properties. 		
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10	General		Parker Strategic Lane	<p>PSL has fundamental concerns with the NP as drafted, in particular the lack of substantive evidence to justify the approach taken, including a number of designations proposed by the plan. Ultimately, National Planning Policy Framework ('NPPF') (2024) para 30 is clear that:</p> <p>"Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies". The above follows that neighbourhood plans must be in general conformity with the strategic policies contained in the development plan that covers their area. The development plan for this area is the adopted HLP. Whilst the District Council may be advancing the new Local Plan, it is yet to be submitted for examination and is not expected to be adopted until December 2026 / January 2027 (Harborough Local Development Scheme, Nov 2025) at the earliest, quite possibly at a much later date. In accordance with NPPF para 49, the emerging new Local Plan therefore attracts no weight and should not be afforded any weight until it is more advanced and any outstanding objections have been resolved (i.e. following examination hearing sessions and closer to adoption). As</p>	<p>Noted.</p> <p>We fundamentally disagree with this comment.</p> <p>The NP has to take into account the latest evidence of housing need, which is contained in the Regulation 19 Local Plan Review. To do otherwise would fail to achieve the support of Harborough DC.</p> <p>The NP does not promote less housing than required, as the housing requirement for Scraptoft is met by the Local Plan allocation.</p>	None
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				such, national planning policy requires this NP review to be in general conformity with the adopted Harborough LP, contrary to basic condition e.		
10	Section 4		Parker Strategic Land	<p>The NP Review notes early on (section 4, p5) that the Scraftoft North SDA (policy SC1) “...was not developed for financial viability reasons”. This is incorrect and the plan provides no evidence for this position. Scraftoft North remains deliverable and is now to come forward on a phased basis, with an outline planning application for phase 1 and up to 190 homes to be submitted shortly. The site remains deliverable and is formed of a strategic allocation in the adopted development plan. The above mentioned line should therefore be deleted from the NPR.</p>	<p>The Qualifying Body has seen correspondence from the developers confirming that the requirement for Affordable Housing could not be achieved through the strategic development and neither could the infrastructure requirements.</p> <p>The site was put forward in 2019 in the Harborough Local Plan and has still not come forward seven years later.</p>	None
10		Policy HBE1	Parker Strategic Land	<p>The adopted HLP allocates land at Scraftoft North for development (policy SC1), including approximately 1,200 homes. The settlement boundary identified at figure 3 of the NP (which repeats the boundary shown in the made NP) does not include Scraftoft North as either within the settlement boundary or a proposed allocation. Indeed, NPPF para 30 states that a NP “...should not promote less development than set out in the strategic policies for the area, or undermine those</p>	<p>This is wrong.</p> <p>The NP meets the latest evidence of housing need as contained in the Regulation 19 Local Plan Review.</p> <p>The deallocated strategic site in the now out of date Local Plan is replaced and updated with an allocation in the Regulation 19 Local Plan Review which the NP Review acknowledges.</p>	None

				strategic policies". By not identifying Scraftoft North within the settlement boundary, or identifying it as an SDA, the NP is essentially seeking to promote less development than the HLP. Therefore, as drafted, the NP is not in general conformity with the development plan, as required by national planning policy. To be in conformity with the development plan the NP should identify Scraftoft North as a proposed allocation for development and include it within the settlement boundary.	The minimum housing requirement is met.	
10		Policy ENV1	Parker Strategic Land	This designation will, in part (including at Scraftoft North), essentially overlay land already designated as 'green wedge' in the adopted HLP. In designating the land green wedge, the HLP is clear at para 4.11.3 (p38) that much of the area of separation in the made Scraftoft NP is 'effectively superseded' by HLP policy GD7 (green wedge). The NPR states that the proposed area of separation will 'supersede' and / or 'replace' the green wedge and area of separation designation in the development plan. There is no evidence (such as a proportionate area of separation assessment paper), or justification in the NPR itself, for superseding or replacing the green wedge policy in the HLP, particularly insofar	<p>The justification for the Area of Separation is evident from the level of developer interest in land surrounding Scraftoft</p> <p>Policy ENV 1 endorses HDC's Area of Separation designation in the emerging Local Plan (which updates the Green Wedge designation of the same land in the adopted LP); as an existing designation it does not need additional justifying evidence in the NP. Also, the primary intention of Areas of Separation is to prevent coalescence of neighbouring built-up areas</p>	None

				as it relates to Scraftoft North. As per NPPF para 30 and footnote 17 (and basic condition e.), neighbourhood plans should be in general conformity with strategic policies contained in the development plan and not seek to replace (or set) those strategic policies. For the NPR to meet basic condition e., the proposed area of separation designation should therefore be deleted insofar as it relates to Scraftoft North.	without reference to other (e.g. environmental), site-specific significance.	
10		ENV2	Parker Strategic Land	The southern extent of Scraftoft North is proposed to be designated 'local green space' in the emerging NP (it is green wedge only in the made NP). 3 Firstly, there is no evidence which underpins the proposed designation. The only evidence to support this designation is the Appendix 3 Local Green Space and Open Space Sport and Recreation report (undated). There is no methodology to the report, and the commentary is limited and is not informed by any technical evidence. The scoring is also based on incorrect information and is inconsistent. The area scores five out of five for recreational value based on 'walking and dog walking'. This notwithstanding, the land is not accessible to the public and is not crossed by any public right of way. Yet other publicly accessible sites	Agreed. We will amend the score for public access to 3. This site's previous inclusion in the SNSDA is immaterial following the SNSDA's de-allocation. It was assessed, scored (against the NPPF criteria for Local Green Space) and described (in Appendix 3) using the same approach applied consistently across all candidate LGS and OSSR sites. We took its designations as Local Nature Reserve (historic but not cancelled) and LWS (current, validated) as <i>de facto</i> supporting evidence – noting that the LWS	Change to be made as indicated.

				<p>assessed (such as James Way / Church Hill green, ref: 006) scores three out of five. The 'history' category also has no relevance to planning policy (such as whether the site includes a designated heritage asset). Furthermore, the biodiversity category is not based on any technical ecological evidence. Secondly, and most importantly, the proposed designation (insofar as it relates to Scraftoft North) is not in general conformity with the development plan since this area forms part of the site allocated for development under policy SC1 and it is not identified as open green space within the allocation. For the NPR to meet basic condition e., the proposed local green space designation should be deleted insofar as it relates to Scraftoft North.</p>	<p>designation is supported by professional assessment and technical evidence in the Leicestershire Environmental Record Centre data. The 'history' category (as an NPPF criterion) allows historical significance at all levels (including recognition as a Non-Designated Heritage Asset and local/social importance) to be taken into account</p>	
10		ENV3	Parker Strategic Land	<p>PSL's land at Covert Lane (site 008) is proposed to be designated as an open space, sport and recreation site. As is made clear by the assessment of the site in Appendix 3 Local Green Space and Open Space Sport and Recreation report, it has not been used for sport and recreation since 2016. At that point the site had become unusable, with the playing surfaces very poor. In any case, as demonstrated by the current application</p>	<p>Parker Strategic Land also attached letters from Leicester Tigers (Appendix 3) confirming this. They do not mention Sport England's objection to the planning application for developing the rugby field. There is also a letter from Howes Percival (Appendix 4) which further outlines the Tigers' plans to</p>	None

			<p>(Harborough ref: 23/01690/OUT) the site has never been available to the community, the facility was exclusively used by Leicester Tigers for limited training purposes following Stoneygate RFC's relocation in 2013, and all built facilities have been demolished as they had fallen into dereliction following a fire. Stoneygate RFC relocated to the Community College at Uppingham, with all of Leicester Tigers' training facilities now provided at Brooksby Melton College; the sale of the Covert Lane site to PSL partly funded the redevelopment of the training ground there. Two detailed letters from Leicester Tigers and Howes Percival are enclosed at appendices 3 and 4 which provide further detail regarding the above; both letters have been submitted with outline planning application 23/01690/OUT. As the site has never been available for community use, and has not been used for sport or recreation for circa ten years, there is no evidence to support it being designated as an open space, sport and recreation site through the NPR. Indeed, the site already fails the test at draft policy ENV3 – it is clear from the evidence submitted with outline planning application 23/01690/OUT that the</p>	<p>move their bases to Brooksby College at Melton and Uppingham. However this fails to take into account that both facilities do not have a public transport link from Scraptoft and therefore are of no benefit to Scraptoft residents.</p> <p>The site is <u>already</u> an OSSR in the latest HDC audit (the NP endorses this designation).</p> <p>The site's <i>de facto</i> use as informal Open Space use with unfettered access since at least 2015 is pertinent, as is its adjacency to the green buffer/OSSR on the east edge of the recent development, whose value as green buffer would be destroyed by further development on its external side.</p>	
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				site is no longer required by the community. The site should therefore be deleted as an open space, sport and recreation site if the NPR is to satisfy basic condition a.		
10		ENV4	Parker Strategic Land	Under policy ENV4 the NPR proposes to continue identifying the southern extent of Scraftoft North as a site of natural environment significance. This reflects its status as a Local Nature Reserve (the reserve will be de-designated upon planning permission being granted for the relevant phase of Scraftoft North). 4 There are no significant comments on the policy, it reflects national policy in that it does allow for development effecting the site subject to the benefits outweighing the biodiversity significance, including achieving 10% BNG. Indeed, the intention is for any future proposals to include the land within open space.		
10		ENV5	Parker Strategic Land	NPPF para 187 is clear that only valued landscapes and sites of biodiversity or geological value should be 'protected'. The HLP does not identify any land at either Scraftoft North or Covert Lane for its biodiversity value. National policy therefore only requires policies and decision makers to 'recognise' the intrinsic character and beauty of the countryside. For this	The wildlife corridors mapped in figure 9.1 provide connectivity for the sites (green shading) of biodiversity significance identified in Figure 8; this mapping is not limited to sites in HDC G15. We also note that the prescriptive	None

				<p>reason, 'protecting and enhancing' the wildlife corridors identified at fig 9.1 would therefore be contrary to national planning policy and not satisfy basic condition a. or e., as it is also contrary to HLP policy GI5 (biodiversity and geodiversity). Furthermore, this approach creates a very clear conflict between the wider draft policy ENV5 and draft policy ENV4, with policy ENV4 allowing for a balancing act between harms and benefits to be undertaken, including potential mitigation. In any case, there is no proportionate technical evidence to identify or justify the wildlife corridors identified at fig 9.1. For draft policy ENV4 to meet basic conditions a. and e., the fourth paragraph of the policy and fig 9.1 must be deleted, as should all supporting text relating to fig 9.1.</p>	<p>phrase in ENV5 is '<i>should not create barriers to the permeability of the landscape for wildlife in general, or result in the fragmentation of populations of species of conservation concern</i>'; this does not preclude development proposals but requires them to take account of maintenance of connectivity and to demonstrate how they will do so</p>	
10		ENV8	Parker Strategic Land	<p>As drafted, this policy is not in general accordance with national planning policy. Ridge and furrow is already considered by the NPPF as it is a 'non-designated heritage asset' (para 216). That paragraph requires a balanced judgement having regard to the scale of any harm or loss and significance of the heritage asset. The NPPF does not require any consideration of 'local benefits', which forms part of draft policy ENV8. Given</p>	<p>Policy ENV8 does no more than require this balanced judgement, so it is in accordance with NPPF #216. The policy is included because, by mapping the surviving ridge and furrow in the Neighbourhood Area, it <i>adds local detail</i> to HDC and NPPF policies</p>	

				draft policy ENV8 is not in accordance with national policy, and seeks to go beyond the requirements of the NPPF, for the NPR to meet basic condition a. this policy should be deleted. References to the policy would also need to be deleted from draft policy ENV11.		
10		ENV9	Parker Strategic Land	Figures 14 and 17 in the NPR wrongly show 'important view' no5 looking east, beyond Mount woodland (including over PSL's Covert Lane site). Contrary to figures 14 and 17, the policy wording contained in draft policy ENV9 refers to the important view being 'into' the Mount woodland, Appendix 4 Important Views document (undated) also shows that there is no view beyond the Mount Woodland. To ensure the NPR is clear to the decision maker and capable of meeting basic condition a. and according with NPPF para 16, clear figures 14 and 17 should therefore be amended to show an arrow looking into Mount woodland only, or the viewpoint should be deleted completely. As drafted it is unclear and ambiguous.	Thank you for pointing out the lack of clarity. View 5 is actually from the bounding open space <i>and</i> Mount Woodland, across the open countryside beyond.	Change to be made as indicated.
10		Policy T1	Parker Strategic Land	Whilst there is no objection to this policy, it essentially repeats the requirements of HLP policies such as policy IN2, as well as the already established LCC parking standards. We do not therefore consider it necessary to repeat adopted policies	The policy builds on two separate policies from the Made NP and identifies solutions to local traffic problems so we feel it should be retained.	None

				or standards in the NPR.		
10		Policy IN1	Parker Strategic Land	<p>Policy IN1 effectively reads as an infrastructure delivery plan ('IDP') specific to Scraptoft. Yet none of the infrastructure listed is supported by any evidence. For instance, additional school places at Fernvale Primary School is a Leicestershire County Council matter as the local education authority, which will be considered as part of any planning application for new development in the parish, irrespective of whether policy IN1 is included in any made LPR. In addition, medical facilities are a matter for the integrated care board, to be considered as part of any planning application for new development in the parish. Whilst the Parish Council may have an ambition for a new pharmacy to be delivered in the village, there is no planning policy which requires such a use being provided as part of development. Without the necessary evidence, any contribution to these matters will not be CIL compliant. To ensure the NPR is capable of meeting basic condition a., parts a) and d) should be deleted from draft policy IN1, and it should be made clear that facilities such as a pharmacy (and recreation provision for older children) are an</p>	<p>Noted. The policy identifies local priorities for infrastructure and as such is an important section.</p> <p>The policy says that the infrastructure identified here will be supported. It is not a requirement but a guide to developers as to what is prioritised locally.</p>	None

				'aspiration' rather than requirement.		
10		Design Code	Parker Strategic Land	Section 4.1 of the Design Code indicates that the guidance and code is not to be applied to the 'Strategic Development Area'. It is presumed this refers to Scraftoft North, however a plan should be included in the Design Code to make this clear. PSL's full response to the Design Code is enclosed (appendix 5) in the comments prepared by Stantec.	Noted. Stantec's comments are small technicalities which don't require any major changes.	None None
11	General		Natural England	"Natural England does not have any specific comments on this draft neighbourhood plan."	Noted	None
12		ENV5	Environment Agency	We welcome the inclusion of this section Policy ENV 5. We note though that in the supporting text <i>Biodiversity Net Gain off-site offsetting: site allocation</i> (page 31), the relevant paragraphs numbers of the National Planning Policy Framework are yet to be provided. We would suggest those paragraphs are 187, 192 and 193.	Agreed.	Change to be made as indicated.
12		ENV10	Environment Agency	We welcome the inclusion of this section, including the detail provided in the commentary and the wording of Policy ENV 10.	Noted.	None
12	Renewable Energy Generation Infrastructure		Environment Agency	We welcome the inclusion of this section within the Plan.	Noted. Thank you for this comment.	None
13	Housing		Leicester City	1. Housing and the Built Environment 1.1 As	Noted	None

	and the Built Environment		Council as neighbouring planning authority	<p>noted on p.14 of the Neighbourhood Plan Review, there is a remaining 4,650 dwellings to be completed in Harborough District in order for it to meet its housing requirement as set by the Harborough Local Plan 2011-2031 (Adopted 2019) (the Harborough Local Plan), equating to 35% that is still to be delivered. The Neighbourhood Plan Review also recognises that Scraftoft is part of the Leicester Principal Urban Area, which sits within the top tier of the settlement hierarchy described in Policy SS1 of the Harborough Local Plan. Policy SS1 sets out the proposed scale and distribution of new development in Harborough District with a focus on those at the higher levels of the hierarchy. It is therefore established that Scraftoft is one of the settlements that is most suitable in sustainability terms to contributing significantly towards meeting the development needs of Harborough District to 2031 as well as being well suited to meet housing needs arising from Leicester City. 1.2 It is noted that the Neighbourhood Plan Review does not allocate sites because proposed allocations in the proposed submission draft Harborough Local Plan 2020-2041 (the emerging Local Plan) will meet the total</p>	<p>The Adopted Local Plan is out of date. The Regulation 19 Local Plan Review contains the most up to date evidence of housing need.</p> <p>You cannot require conformity with the Local Plan's housing requirement figures whilst ignoring the latest evidence of housing need as contained in the Regulation 19 Local Plan.</p>	<p>None</p> <p>None</p> <p>None</p>
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			<p>housing requirement for 2 the Neighbourhood Area. However, it is stated in Section 3 (p.9) of the Neighbourhood Plan Review that: "...the key planning document with which a NP must be in general conformity is the Local Plan. In the case of Scraftoft, this is the HDC Local Plan which was adopted in April 2019. This Local Plan is currently under review; however, it is the 2019 Local Plan that will be in place and relevant when this NP Review is finalised." However, the Neighbourhood Plan Review is not in general conformity with the Harborough Local Plan because it disregards the Scraftoft North Strategic Development Area (SDA), which is a site allocation in the adopted Local Plan. As such, the Neighbourhood Plan Review is contrary to paragraph 30 of the NPPF, which states that "Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies". To meet the requirements of NPPF, paragraph 30 and basic condition (e) of Section 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended), the Neighbourhood Plan Review must be in conformity with the adopted Harborough Local Plan, including the sites it has allocated</p>	<p>Scraftoft North has been superseded. You cannot continue to rely on it 7 years after being included in the Local Plan and after having been replaced by a new allocation.</p>	
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				<p>for development. 1.3 The emerging Local Plan proposes to de-allocate the Scraftoft North SDA. It is the City Council's view that it is premature for the Neighbourhood Plan Review to assume that the Scraftoft North SDA will be de-allocated as the emerging Local Plan currently carries very limited weight and has yet to be scrutinised at Examination in Public.</p> <p>1.4 The Neighbourhood Plan Review says on p.14 that the Scraftoft North SDA "was not developed for financial viability reasons". The site is an existing allocation within the Harborough Local Plan and the Local Plan period has not expired. It is very possible for development proposals to still come forward on the site. It is therefore premature to conclude that the site will not be developed within the Local Plan period.</p>		
13		HBE1 : Settlement Boundary	Leicester City Council as neighbouring planning authority	<p>The Harborough Local Plan (2011-2031) allocates the Scraftoft North SDA which is within the Scraftoft Neighbourhood Area, and which is contiguous with the built-up area of Scraftoft village. However, the Scraftoft North SDA, which remains an extant site allocation, falls outside the settlement boundary proposed 3 in Policy HBE1. Through excluding an existing Local Plan site allocation from the settlement boundary, there is a policy conflict</p>	<p>The Local out of date and the strategic allocations within it have fallen away.</p> <p>It is not the intention of the planning system for Scraftoft to receive both the allocation in the Adopted Local Plan AND the allocation in the Regulation 19 Local Plan Review. The latter is intended to supersede the</p>	None

			<p>between the Neighbourhood Plan and the Local Plan. This is because the settlement boundary is intended to define where development is acceptable in principle. The Neighbourhood Plan Review is therefore not in general conformity with the strategic policies of the Local Plan. Consequently, the Neighbourhood Plan Review fails to meet basic condition (e), as set out in Section 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended). 1.7 As stated in supporting text for the policy, the purpose of the settlement boundary is “to distinguish between areas where in planning terms development would be acceptable in principle such as in the main settlements and where it would not be (generally in the least sustainable locations) such as in the open countryside”. By restricting the settlement boundary to the existing built-up area of Scraptoft, this policy does not contribute to the achievement of sustainable development. Thus, the Neighbourhood Plan Review fails to meet basic condition (d), as set out in Section 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended). 1.8 In order to meet the basic conditions, the City</p>	<p>former, otherwise Scraptoft North would be in the emerging Local Plan.</p> <p>This argument is therefore fundamentally flawed.</p> <p>We disagree. Scraptoft meets its identified housing requirement through the proposed strategic allocation. It is therefore entirely reasonable to draw the settlement boundary around the built-up area.</p>	None
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				Council recommends that the settlement boundary is revised to include the Scraftoft North SDA which is allocated in the adopted Harborough Local Plan.		
13		HBE2 : and HBE3	Leicester City Council as neighbouring planning authority	The City Council welcomes the fact that Scraftoft Parish Council has undertaken a housing needs assessment looking at the required housing mix and need for affordable housing in the neighbourhood area and that the Neighbourhood Plan Review includes policies to address these matters.	Noted	None
13		ENV1	Leicester City Council as neighbouring planning authority	Part of the area of separation, as outlined in Figure 5 in the Neighbourhood Plan Review, overlaps with a proposed site allocation in the emerging Local Plan. Designation of the land as an area of separation in the Neighbourhood Plan Review is incompatible with its proposed allocation for residential and educational development. This policy does not therefore contribute to the achievement of sustainable development and is not in general conformity with the strategic policies of the emerging Local Plan. The Neighbourhood Plan Review, therefore, fails to meet basic conditions (d) and (e), as set out in Section 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended)	<p>The AoS avoids the proposed allocation.</p> <p>When considering the NP's contribution to sustainable development, you cannot consider individual policies alone, but rather look at the plan as a whole.</p> <p>Clearly individual policies will involve a degree of protection, but this needs to be seen within the context of other plan policies.</p> <p>Otherwise, there would be no opportunity for ANY policy on local green space, area of separation etc which limit development but</p>	None

					are accepted NP policies.	
13		ENV2	Leicester City Council as neighbouring planning authority	<p>The City Council strongly objects to designation of 'Scraptoft Nature Reserve' as a Local Green Space on the following grounds: A. Paragraph 107 of the NPPF sets the tests for designating a specific area of land as Local Green Space. It states that designation should only occur where the green space is: "a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land." The 'Scraptoft Nature Reserve' is not small; it is 14.2 ha in size which is an extensive tract of land, comprising 2.7% of the entire Neighbourhood Area. The large size of the site, its location at the edge of the existing built-up area, and the lack of pedestrian access onto the land from the existing built-up area mean it cannot be considered local in character. Appendix 3 scores the site highly in its assessment of the site for Local Green Space designation. However, no methodology for these</p>	<p>As above</p> <p>Scraptoft has met its housing requirement up to 2041 through the proposed</p>	None

			<p>scores is provided. We object to the proposed designation of the 'Scraptoft Nature Reserve' as Local Green Space as it does not meet the requirements for designation under paragraph 107 of the NPPF. B. The 'Scraptoft Nature Reserve' is part of the Scraptoft North SDA, allocated under Policy SC1 of the adopted Harborough Local Plan to provide approximately 1,200 dwellings, a primary school, a neighbourhood centre, open space, sport, and recreation facilities, and a new cemetery. The 'Scraptoft Nature Reserve' was not a Local Green Space in the Scraptoft Neighbourhood Plan (2015-2028) but has been proposed for inclusion in this Neighbourhood Plan Review. It appears that the Local Green Space designation is being used in an attempt to frustrate future sustainable development in Scraptoft on an existing allocated site in a manner that is directly contrary to paragraph 044 of National Planning Practice Guidance on Neighbourhood Plans. Again, the Neighbourhood Plan Review fails to meet basic conditions (d) and (e), as set out in Section 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as</p>	<p>allocation in the Local Plan. There is no obligation to make EVERY plot of land available for development, and protecting the most locally important environmental areas is entirely reasonable where the housing requirement is met.</p> <p>LCC's land is outside of the Neighbourhood Area and so the policies in the Scraptoft NP do not impact on the ability of LCC to meet its unmet housing need. HDC has prepared a Local Plan Review which addresses unmet need from Leicester City without the need for Scraptoft to take a disproportionate share.</p>	
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				<p>amended). C. As you are aware, Leicester City has a large housing and employment need. In view of this, a Statement of Common Ground (June 2022) (the SoCG) was created by the Leicester and Leicestershire Authorities to agree an approach to address Leicester's unmet housing and employment need. This SoCG demonstrates the recognition by all the authorities that Leicester cannot meet its growth within its administrative boundaries and must export some of its 5 need to the other Leicestershire authorities. Scraptoft Parish Council is aware that the Scraptoft North SDA site is an extant allocation in the Harborough Local Plan, which would contribute towards meeting the housing needs of the HMA as agreed in the SoCG. In addition, paragraph 106 of the NPPF states that "Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services". Paragraph 124 of the NPPF states that planning policies should promote an effective use of land in meeting the need for homes and other uses. In attempting to designate this site a</p>		
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				Local Green Space, Scraftoft Parish Council is knowingly and actively undermining the effort to promote and deliver an effective and sustainable use of this land which will significantly contribute to meeting the housing need of the Leicester and Leicestershire HMA, contrary to paragraphs 106 and 124 of the NPPF.		
13		ENV9	Leicester City Council as neighbouring planning authority	This policy states 'Development which would block or have an unacceptably adverse impact on the identified views will not be supported.' The use of the word 'block' is ambiguous when considering an 'important view' and could be utilised as a means of hampering future sustainable development in the Neighbourhood Area. The City Council recommends removal of this word.	Agreed	Change to be made as indicated.
13		T1	Leicester City Council as neighbouring planning authority	The Leicester City Local Transport Authority is pleased to see that Policy T1: Sustainable Transport is positive towards sustainable travel. We would like to see a reference to Leicester city centre in the Policy to further strengthen the connectivity and accessibility from new development sites to the city. We understand the concerns around on-street parking and the document states that new housing development should include generous level of car parking to		Change to be made as indicated.

				<p>minimise the need for on-street parking. It is important as part of the Master Planning process and the development of an access strategy and mitigation strategy that there is a high quality, attractive provision of sustainable transport provided, so residents have the potential to travel by means of transport other than the car as a way to reduce traffic levels and the demand for parking. Criterion f) of Policy T1 mentions that Travel Packs are to be provided on residential developments, and this is supported. In addition to promoting existing and new pedestrian cycle routes as part of the Travel Pack, we would also want to see measures to encourage the use of public transport and car sharing to offset the reduction of single occupancy vehicle trips</p>		
14	Flood Risk		Leicestershire County Council	<p>The inclusion of a policy on flood risk resilience is welcomed. Overall, the Plan recognises flood risk as a relevant issue, however it would benefit from some clarification to ensure that all sources of flood risk are adequately addressed. In particular, the Plan should make clear that flood risk is not limited to fluvial flooding, and that surface water flooding and ordinary watercourses should also be taken into account where development is proposed. The Local</p>	<p>Noted. The risk of flooding from surface water as well as fluvial flooding is already referenced in the NP.</p> <p>SuDS is also referenced and is considered sufficiently clear.</p> <p>Other comments reference national policy, which developments are required to follow.</p>	None

				<p>Lead Flood Authority (LLFA) would also expect the Plan to set a clearer requirement for the use of sustainable drainage systems (SuDS) in new development, designed in line with the national standards for sustainable drainage systems and current best practice. Where development is proposed in areas at risk of flooding, or where it may affect drainage patterns or nearby watercourses, the Plan should clarify that site-specific Flood Risk Assessments will be required at the planning application stage. It would also be helpful for the Plan to recognise the presence of ordinary watercourses and the associated riparian responsibilities of landowners, particularly where development is proposed close to these features. There is an existing surface water flooding issue in the Cranbrook Road area which is being investigated under Section 19 of the Flood and Water Management Act 2010. Any development proposals within the upstream catchment of either the Thurnby Brook or the surface water drainage system serving Cranbrook Road, must demonstrate that opportunities to reduce the risk of flooding to Cranbrook Road have been considered and implemented where</p>		
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				<p>feasible. Subject to the above comments, the LLFA has no objection in principle to the draft Neighbourhood Plan.</p> <p>Flood Risk Management The County Council are fully aware of flooding that has occurred within Leicestershire and its impact on residential properties resulting in concerns relating to new developments. LCC in our role as the LLFA undertake investigations into flooding, review consent applications to undertake works on ordinary watercourses and carry out enforcement where lack of maintenance or unconsented works has resulted in a flood risk. In April 2015 the LLFA also became a statutory consultee on major planning applications in relation to surface water drainage and have a duty to review planning applications to ensure that the onsite drainage systems are designed in accordance with current legislation and guidance. The LLFA also ensures that flood risk to the site is accounted for when designing a drainage solution. The LLFA is not able to:</p> <ul style="list-style-type: none"> • Prevent development where development sites are at low risk of flooding or can demonstrate appropriate flood risk mitigation. • Use existing flood risk to adjacent land to prevent development. • Require development to resolve existing flood risk. 		
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				<p>When considering flood risk within the development of a neighbourhood plan, the LLFA would recommend consideration of the following points: • Locating development outside of river (fluvial) flood risk (Flood Map for Planning (Rivers and Sea)). • Locating development outside of surface water (pluvial) flood risk (Risk of Flooding from Surface Water map). • Locating development outside of any groundwater flood risk by considering any local knowledge of groundwater flooding. • How potential SuDS features may be incorporated into the development to enhance the local amenity, water quality and biodiversity of the site as well as manage surface water runoff. • Watercourses and land drainage should be protected within new developments to prevent an increase in flood risk. All development will be required to restrict the discharge and retain surface water on site in line with current government policies. This should be undertaken through the use of Sustainable Drainage Systems (SuDS). Appropriate space allocation for SuDS features should be included within development sites when considering the housing density to ensure that the potential site will not</p>		
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				<p>limit the ability for good SuDS design to be carried out.</p> <p>Consideration should also be given to blue green corridors and how they could be used to improve the biodiversity and amenity of new developments, including benefits to surrounding areas.</p> <p>Often ordinary watercourses and land drainage features (including streams, culverts and ditches) form part of development sites. The LLFA recommend that existing watercourses and land drainage (including watercourses that form the site boundary) are retained as open features along their original flow path and are retained in public open space to ensure that access for maintenance can be achieved. This should also be considered when looking at housing densities within the plan to ensure that these features can be retained. LCC, in its role as LLFA will not support proposals contrary to LCC policies.</p>		
14	General		Leicestershire County Council	<p>The County Council recognises that residents may have concerns about traffic conditions in their local area, which they feel may be exacerbated by increased traffic due to population, economic and development growth. Like very many local authorities, the County Council's budgets are under</p>	Noted	None

				<p>severe pressure. It must therefore prioritise where it focuses its reducing resources and increasingly limited funds. In practice, this means that the County Highway Authority (CHA), in general, prioritises its resources on measures that deliver the greatest benefit to Leicestershire's residents, businesses and road users in terms of road safety, network management and maintenance. Given this, it is likely that highway measures associated with any new development would need to be fully funded from third party funding, such as via Section 278 or 106 (S106) developer contributions. I should emphasise that the CHA is generally no longer in a position to accept any financial risk relating to/make good any possible shortfall in developer funding. To be eligible for S106 contributions proposals must fulfil various legal criteria. Measures must also directly mitigate the impact of the development e.g. they should ensure that the development does not make the existing highway conditions any worse if considered to have a severe residual impact. They cannot unfortunately be sought to address existing problems. Where potential S106 measures would require future maintenance, which would be paid for</p>		
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				<p>from the County Council's funds, the measures would also need to be assessed against the County Council's other priorities and as such may not be maintained by the County Council or will require maintenance funding to be provided as a commuted sum. In regard to public transport, securing S106 contributions for public transport services will normally focus on larger developments, where there is a more realistic prospect of services being commercially viable once the contributions have stopped ie they would be able to operate without being supported from public funding. The current financial climate means that the CHA has extremely limited funding available to undertake minor highway improvements. Where there may be the prospect of third-party funding to deliver a scheme, the County Council will still normally expect the scheme to comply with prevailing relevant national and local policies and guidance, both in terms of its justification and its design; the Council will also expect future maintenance costs to be covered by the third-party funding. Where any measures are proposed that would affect speed limits, on-street parking restrictions or other Traffic Regulation</p>		
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				Orders (be that to address existing problems or in connection with a development proposal), their implementation would be subject to available resources, the availability of full funding and the satisfactory completion of all necessary Statutory Procedures.		
14	Planning/Education		Leicestershire County Council	<p>It is noted that the Scraftoft Neighbourhood Plan Review retains the defined settlement boundary for the village of Scraftoft that was designated in the Made Neighbourhood Plan (2016). The settlement boundary will need to change to reflect the two housing allocations identified in the emerging Harborough Local Plan which has reached an advanced stage (Regulation 19 in March 2025 and due to be submitted to the Planning Inspectorate for examination in 2026). The Scraftoft NP Review refers to the two draft housing allocations for Scraftoft which are within the Harborough Local Plan (Reg 19) which are Scraftoft East (Harborough LP (Reg 19) Policy S1: Scraftoft East, land between Scraftoft and Bushby, 950 dwellings) and Land at Beeby Road (Policy S2: Land at Beeby Road, 175 dwellings), representing the total housing requirement for Scraftoft during the Local Plan period to 2041, and as such the</p>	<p>Noted. We will amend the policy in line with the proposed form of words suggested by HDC as follows, 'The settlement boundary does not apply to land allocated for strategic development in the Harborough proposed Local Plan (Policy SA04). Development in these areas will be guided by the Local Plan and an approved masterplan.'</p>	Change to be made as indicated.

				<p>Parish Council making the decision not to allocate further sites through the Neighbourhood Plan as the minimum housing requirement for the Neighbourhood Area has been met. Given the advanced stage reached by the Local Plan and the recognition within the Scraftoft NP Review that the two allocations meet the minimum housing requirements for the Neighbourhood Area it is advised that the settlement boundary is redefined to reflect the two draft housing allocations. From the County Council's perspective as a key infrastructure provider/enabler it is important the implications for infrastructure to support the draft housing allocations are clearly identified, in particular, in this instance regarding education. Education officers have advised the further development of Fernvale Primary School to accommodate additional pupils would not be appropriate, as such new education provision is required as set out in Policy SA04: Scraftoft East in the emerging Harborough Local Plan (Reg 19). An extract of relevant wording from Policy SA04 follows: "1. Land between Scraftoft and Bushby as shown on the Policies Map is identified for residential development, together</p>		
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				with essential infrastructure, including the provision of a new primary school." "b) A site for a new two form primary school with early years provision on site;" "5.33. The Infrastructure Delivery Plan sets out Leicestershire County Council's request for a new 2 Form of Entry primary school with early years provision on site." This education requirement also needs to be reflected in the Scraftoft NP Review.		
14	Minerals & Waste Planning		Leicestershire County Council	<p>You should also be aware of Minerals and Waste Safeguarding Areas, contained within the adopted Minerals and Waste Local Plan (Leicestershire.gov.uk). These safeguarding areas are there to ensure that non-waste and non-minerals development takes place in a way that does not negatively affect minerals resources or waste operations.</p> <p>Neighbourhood plan groups should check all proposed site allocations and policy areas against these safeguarding areas by reviewing the relevant 'District councils' minerals and waste safeguarding' map. Some areas of Scraftoft village sit within the Minerals Safeguarding Area for Gypsum, and this should be taken into consideration in any future development proposals. The County Council can provide guidance on this if your</p>	These general comments that do not relate specifically to the Scraftoft NP Review are noted.	None

				neighbourhood plan is allocating development in these areas or if any proposed neighbourhood plan policies may impact on minerals and waste provision		
14	Adult Social Care		Leicestershire County Council	It is suggested that reference is made to recognising a significant growth in the older population and that development seeks to include bungalows etc of differing tenures to accommodate the increase. This would be in line with the draft Adult Social Care Accommodation Strategy for older people which promotes that people should plan ahead for their later life, including considering downsizing, but recognising that people's choices are often limited by the lack of suitable local options.	These general comments that do not relate specifically to the Scraftoft NP Review are noted.	None
14		HBE5 , ENV2 , ENV3 , ENV10	Leicestershire County Council	Page 65 of the Design Guidance and Codes document – suggest adding in the text highlighted in yellow. Make sufficient provision for sustainable waste management (including facilities for kerbside collection in locations convenient and accessible for collection and emptying, waste separation, and minimisation where appropriate) without adverse impact on the street scene, the local landscape or the amenities of neighbours; Climate Resilience Team comments Policy HBE5 – Building Design Principles - The	Noted. The Design Guide has been finalised and approved so cannot now be altered.	None

			<p>presence of a section on climate resilience within the Design Guide and Codes is welcomed. Figure 48 gives a good visual representation of some important design solutions. However, Design Code 26 lacks tangible actions that could help to realise the policy aim. For example, the document should specify the rainfall event(s) that are to be mitigated wholly within the boundary of the site. Design Code 26 should also specify design led solutions for overheating such as external blinds or shutters on south facing glazing, enhanced natural ventilation and house types that maximise cross ventilation.</p> <p>Policy ENV2 – Local Green Spaces It would be beneficial for the plan to modify existing policies such as ENV2, ENV3 and ENV10 or add to them to ensure the importance of green infrastructure in new developments is not missed. Street trees, SuDS such as verge rain gardens and bioswales, planted front gardens and parks are examples of green infrastructure which can not only promote better surface water infiltration at times of heavy rainfall but also mitigate high temperatures and the heat island effect by providing shading. Consider adding to these policies that high quality green</p>	<p>Noted, however we consider that adding this level of detail to the policies would make the unwieldy and too prescriptive.</p>	None
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			<p>infrastructure should be designed in at a master planning stage. Additionally, it is recommended that aftercare provision for any planting is stipulated to ensure survival during its establishment. Policy ENV10 – Flood Risk Resilience - The introduction of this policy is welcomed, as is the focus on climate change. It could perhaps be made stronger by specifying that run off rates for new developments should not exceed that which the site currently experiences. This should be achieved through on site green SuDS that allow water to infiltrate the ground within its boundary. If not possible then state specific rainfall events such as 1 in 10 year return period events for which water drainage off the site should not occur. Policy CF1 – Retention of Community Facilities and Amenities - Leicestershire County Council would like to see more emphasis on the importance of building social resilience in the face of growing trends for extreme weather. Policy CF1 is therefore welcomed, but could be strengthened by requiring new development to either provide multi-use buildings for community benefit or to enhance pedestrian and cyclist access to existing local facilities to promote</p>	<p>These general comments are noted.</p>	<p>None</p>
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				<p>their use. High quality outdoor green spaces can also perform a similar function in addition to those listed above against policy ENV2.</p> <p>General Comments With regard to the environment and in line with Government advice, Leicestershire County Council would like to see Neighbourhood Plans cover all aspects of archaeology and the historic and natural environment including heritage assets, archaeological sites, listed and unlisted historic buildings, historic landscapes, climate impacts, the landscape, biodiversity, ecosystems, green infrastructure as well as soils, brownfield sites and agricultural land.</p>		
15	General		<p>Bloor Homes (on behalf of Scraftoft Lodge farm at Beeby Road see 25/00767/OUT planning application for 200 homes south of Goodridge Estate)</p>	<p>The Submission Draft Neighbourhood Plan does not include any housing allocations, which in our view would not meet the Basic Conditions. For example, the site at Beeby Road, Scraftoft is a draft allocation under Policy SA01 in the Regulation 19 Harborough Local Plan but this is not carried into the Draft Neighbourhood Plan. The Draft Neighbourhood Plan should include housing allocations and specifically accord with the draft housing allocations in the emerging Local Plan. This will ensure meeting the Basic</p>	<p>This is a fundamental misunderstanding of the role of neighbourhood plans and the relationship with the Basic Conditions. NP's are NOT required to allocate housing sites to meet the Basic Conditions.</p>	None

				Conditions in terms of compliance with national policies and general conformity with strategic policies. There would be benefit in waiting for the new NPPF to be published in the summer and emerging Harborough Local Plan to be submitted and examined, if not adopted later this year/ early into 2027.		
15		HBE1	Bloor Homes (on behalf of Scraftoft Lodge farm at Beeby Road see 25/00767/ OUT planning application for 200 homes south of Goodridge Estate)	<p>Policy HBE1: Settlement Boundary, provides an image of the settlement boundary of Scraftoft in Figure 2. The policy details that development should be located within the settlement unless there are special circumstances to justify its location outside the settlement boundary, as defined by the Harborough local Plan and the NPPF. There is no land use designation nor evidence to support this policy approach and wording, in particular the need to demonstrate 'special circumstances', as this runs contrary to the current NPPF and Harborough Local Plan and would therefore not meet the Basic Conditions. This policy along with the settlement boundary, does not reflect the position in the settlement hierarchy or sustainability of Scraftoft contrary to the Basic Condition requiring the Neighbourhood Plan to contribute to sustainable</p>	<p>Scraftoft has met its housing requirement, as set by HDC, through the Local Plan allocations.</p> <p>The NP therefore contributes to sustainable development.</p> <p>The reference to 'special circumstances' is entirely appropriate as it links this to the Local Plan and the NPPF, both of which identify the 'special' circumstances which need to apply for development proposals outside of the settlement boundary to be approved.</p> <p>We disagree. The policy clearly acknowledges the Local Plan allocations.</p>	<p>None</p> <p>None</p>

				<p>development. This includes the recognition Scraftoft is part of the Leicester Principal Urban Area, at the top in the settlement hierarchy. This policy and settlement boundary do not reflect the updated and revised housing numbers either, which need to be met now and the draft allocations for housing proposed within the emerging Harborough Local Plan. We consider the policy should be positively written and this includes the removal of the need to provide 'special circumstances to justify'. In addition, the settlement boundary should be altered to include this draft allocated housing site included in the Regulation 19 Harborough Local Plan or to wait for this Local Plan to be examined and ideally, adopted. To do otherwise, the Neighbourhood Plan would not meet the Basic Conditions or become out of date as soon as the emerging Local Plan is adopted.</p>		
15		HBE2	<p>Bloor Homes (on behalf of Scraftoft Lodge farm at Beeby Road see 25/00767/OUT planning application for 200 homes south of</p>	<p>Policy HBE2: Housing Mix stipulates sites to deliver smaller homes (three bedrooms or fewer) and homes suitable for older people, subject to viability. We refer above to the Government's publication of draft NPPF for consultation, and this draft introduces policies that address housing mix. Although the NPPF is only in draft format at the time</p>	<p>We agree that the new NPPF is at draft stage and cannot be given weight.</p> <p>It is entirely reasonable for NPs to include policies that add local detail to broader strategic policies as policy HBE2 does.</p>	None

			Goodridge Estate)	of writing these representations, we consider that the policy in the Draft Neighbourhood Plan should be removed as national policy and the emerging Local Plan will guide housing mix.	Local Plan Policy H5 2 says 'Major housing development should provide a mix of house types that is informed by up to date evidence of housing need'. The latest evidence of housing need in Scaptoft is provided by the HNA produced for that purpose.	
15		HBE3	Bloor Homes (on behalf of Scaptoft Lodge farm at Beeby Road see 25/00767/OUT planning application for 200 homes south of Goodridge Estate)	Affordable Housing details the tenure mix for affordable as 60% social/affordable rental and 40% affordable home ownership. However, in Policy HN01: Housing Need, Affordable Homes of the emerging Harborough Local Plan requires a split of 75% social/ affordable rental and 25% affordable home ownership. Whilst it is noted in paragraph 4.6.5 of the Housing Needs Assessment in Appendix 1 there is a deviation from the tenure mix set out within the emerging Local Plan, we consider the affordable housing tenure mix should be consistent between the Draft Neighbourhood Plan and the emerging Local Plan. This would avoid confusion and to provide a uniform approach across the District.	The HNA for Scaptoft confirms the tenure mix required locally and is therefore appropriate for a NP policy. The very essence of neighbourhood planning is that it moves away from a 'uniform approach across the District' where there is local evidence to justify it.	None
15		T1	Bloor Homes (on behalf of Scaptoft Lodge	Sustainable Transport, discusses the requirements for major housing developments. More specifically, point b asks for provision for	Agreed. We will add in reference to a financial contribution being acceptable where necessary	Change to be made as indicated.

			farm at Beeby Road see 25/00767/OUT planning application for 200 homes south of Goodridge Estate)	accessible and efficient public transport routes in the development as well as improvements to public transport facilities servicing the development. Such provision would need to be proportionate to the scale of the proposed development and in accordance with the CIL Regulations and Planning Obligation test in the NPPF and PPG (to meet the Basic Conditions). It is possible that improvements serving developments may be outside of the developers control and more likely that a contribution is requested for such improvements. We would seek a change in wording to point b to include the option of a financial contribution. Similarly, it is understood that other financial contributions are likely to be requested from departments relating to (but not limited to) the infrastructure set the in Policy IN1. We ask for the Parish Council to ensure Policy IN1 is in accordance with CIL Regulations and Planning obligation.	improvements are outside of the developer's control.	
16		HBE1	Harborough District Council (Matt Bills)	<ul style="list-style-type: none"> Suggested Modification: Amend Policy HBE1 to explicitly acknowledge the strategic allocation at Scraftoft East and confirm that the settlement boundary will not constrain 	Agreed	Change to be made as indicated.

				<p>development required by Policy SA04 of the PSLP.</p> <ul style="list-style-type: none"> • <i>Add wording:</i> Suggested Modification: • <i>“The settlement boundary does not apply to land allocated for strategic development in the Harborough proposed Local Plan (Policy SA04). Development in these areas will be guided by the Local Plan and an approved masterplan.”</i> 		
16		HBE3	Harborough District Council (Matt Bills)	<p>Suggested Modification: <i>“Affordable housing should reflect local needs and be integrated with market housing to help meet the identified needs of the Parish as set out in the HNA. A tenure mix of 60% social/affordable rent and 40% affordable home ownership is recommended.”</i></p>	Agreed	Change to be made as indicated.
16		HBE4	Harborough District Council (Matt Bills)	<p>Suggested Modification for future proofing: <i>“Infill and redevelopment within the Settlement Boundary will be supported where proposals:</i></p> <ul style="list-style-type: none"> • <i>Retain important natural features;</i> • <i>Provide safe access and do not worsen congestion;</i> • <i>Maintain adequate garden space and residential amenity.</i> <p><i>Windfall development will not be supported in</i></p>	Noted. We think that the policy as currently worded is sufficiently clear, but we will add in the final paragraph as presented here.	Change to be made as indicated.

				<i>designated Green Wedges or Areas of Separation as defined in the Harborough Local Plan.”</i>		
16		ENV1	Harborough District Council (Matt Bills)	Suggested Modification: “ENV1: Area of Separation: <i>Development in the designated Area of Separation (Figure 5) must maintain physical and visual separation between Scraftoft, Thurnby and Leicester.</i>	Agreed	Change to be made as indicated.
16		ENV2	Harborough District Council (Matt Bills)	Suggested policy revision: <i>e.g Development that harms designated Local Green Spaces (Figure 6) will not be supported except in very special circumstances. Sites: Edith Cole Memorial Park and Scraftoft Nature Reserve</i>	Noted. We will change the word ‘permitted’ to ‘supported’.	Change to be made as indicated.
16		ENV3	Harborough District Council (Matt Bills)	Suggested modification <i>E.g Loss of identified open spaces (Figure 7) will only be supported where equivalent replacement is provided or the space is proven surplus to requirements. Include list?</i>	Agreed	Change to be made as indicated.
16		ENV9	Harborough District Council	Important views includes view from Leticia Avenue to Scraftoft Hall (view 2), but not the view from Scraftoft Hall down Leticia Avenue, suggestion to add this.	Agreed	Change to be made as indicated.
17		HBE1	Davidson s/Jelsons	Policy HBE1 is significantly more restrictive than Policy S1 of the currently	This interpretation is incorrect.	None

			<p>adopted Scaptoft Neighbourhood Plan. Here, Policy S1 adopted a positive approach to housing development within the Limits to Development, subject to a series of criteria. Draft Policy HBE1, by contrast, resists all forms of development outside of the drawn settlement boundary, unless there are “special circumstances” as defined within the Harborough Local Plan and the National Planning Policy Framework (NPPF).</p> <p>3.19 The respondents object to this approach for the following reasons. Firstly, there is no such list of “special circumstances” where development is acceptable outside of settlement boundaries either in the NPPF or the Harborough Local Plan. Special circumstances is a very high bar and relevant only to policies in respect of the Green Belt, which are not applicable to the Parish or development in the countryside more generally. 3.20 Secondly, there are a range of cases which may indicate development outside of settlement boundaries is necessary. In instances, for example, where the District Council cannot demonstrate a five-year housing land supply, it is incumbent upon the local planning authority to approve housing development outside of</p>	<p>National planning policy restricts development outside of settlement boundaries as reflected in Policy HBE1, which states that development there should be in line with the Local Plan and the NPPF.</p> <p>This is not more restrictive but rather clarifies the distinction between the approach to development within and outside the settlement boundary.</p> <p>The NP refers to Local Plan policies. If the Local Plan is out of date, then alternative arrangements will apply, however the NP is written to be in general conformity with the Local Plan as it is required to be.</p>	<p>None</p> <p>None</p>
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			<p>settlement boundaries unless the adverse impacts significantly and demonstrably outweigh the benefits. In this case, the presumption is one of approval and not incumbent on an applicant to demonstrate “special circumstances.” Thirdly, the supporting text to Policy HBE1 states that “the Parish Council made the decision not to allocate further sites through the Neighbourhood Plan as the minimum housing requirement has been met through the Local Plan allocations.” This is not accurate. The minimum housing requirement for Scraftoft Parish and the wider District has only been met to 2031, the end date of the adopted Harborough Local Plan. Even then, Scraftoft North, a major part of the Harborough Local Plan’s strategy for housing growth, will not come forward for the quantity of development envisaged. 3.22</p> <p>Although the Scraftoft Neighbourhood Plan Review proposes to run to 2041, the minimum housing requirement for that period — and the spatial strategy for accommodating it — remain to be determined at District level. As the SNPR does not set its own housing requirement or distribution, it should not introduce restrictive policies that limit development outside the settlement</p>	<p>This is an incorrect statement.</p> <p>The latest evidence of housing need is as contained in the Regulation 19 Local Plan Review which supersedes the Adopted Local Plan. It is this document that the NP needs to be in general conformity with as has been agreed with HDC.</p> <p>The SNPR does not introduce restrictive policies – it reflects local and national planning policy guidance.</p> <p>Planning Practice Guidance is also clear that NPs need to take into account the latest evidence of housing need – which it does.</p>	<p>None</p> <p>None</p> <p>Change to be made as indicated.</p>
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				<p>boundary. Rather, it should follow the positive and enabling approach to development within the settlement boundary already established in adopted Policy S1 3.23 The Planning Practice Guidance is clear that neighbourhood plans should have regard to emerging Local Plans. Although a draft neighbourhood plan is not tested against the policies in an emerging local plan, the reasoning and evidence informing the local plan process is relevant when considering whether a neighbourhood plan meets the basic conditions. 3.24 For completeness, the policy text, as drafted, refers to the Settlement Boundary as defined in 'Figure 2' of the Plan. In fact, the Settlement Boundary is depicted in Figure 3, and this typographical error should be corrected.</p>	<p>Agreed. We will amend this to say Figure 3.</p>	
17		HBE2 HBE3	Davidons/ Jelsons	<p>As with Policy HBE2, HBE3 should also add the qualification "where viable and practicable" and should again make reference to site-specific characteristics.</p>	<p>Policy HBE3 says development proposals 'should' provide an appropriate mix of housing and 'recommends' a tenure mix whilst also 'supporting' smaller dwellings, a local connection, design that is indistinguishable from market dwellings and First Homes.</p>	None

					We believe that this provides sufficient flexibility.	
17		ENV6	Davidson s/Jelsons	<p>Firstly, we disagree that a desktop exercise can determine specific “sites of historic environment significance.” Whilst it is possible these areas have archaeological potential, the significance of that archaeology cannot be pre-judged without adequate investigation. However, Policy ENV6 appears to suggest that these sites have “at least local significance” which cannot be determined on the basis of a desktop exercise alone. 3.46 Secondly, it is appropriate to have regard to non-designated heritage assets such as archaeology in determining planning applications as per paragraph 216 of the NPPF. Paragraph 216 is clear, however, that the significance of the asset and the scale of the harm must also be considered, as well as the benefits of the development. 3.47 Accordingly, we consider that Policy ENV6 should be re-drafted to recognise archaeological potential and to require applicants to address this through proportionate investigation and, where necessary, mitigation.</p>	<p>Although ‘desktop’ for the NP drafters, the sites mapped in figure 10 are designations in the Leicestershire Historic Environment Record (and in Historic England data) as ‘monuments’ and have all be validated by professional archaeologists. The evidence supporting the designations is already available in the LHER, so the NP does not need to provide it.</p> <p>Inclusion of the requirement to recognise (or anticipate) archaeological potential would be a re-statement of national guidance. It is routinely dealt with, on a case-by-case basis, by Historic England and/or Leicestershire County Council when development proposals are scrutinised</p>	None
17		ENV9	Davidson s/Jelsons	We have concerns about the inclusion of View 6. This viewpoint is taken from the	The importance of a view to a community is about	None

				<p>modern settlement edge, a location that has only existed for a relatively short period and does not reflect the historic or characteristic landscape experience. View 6 appears to function more as a constraint on development than as a view of demonstrable or higher-than-local landscape value and we note no indication within the plan text or its evidence base to the contrary. Accordingly, we consider that View 6 should be removed. Crucially, Policy ENV9 is drafted such that the threshold for establishing conflict is a high, albeit not insuperable bar. Conflict arises only in instances where development would block or have an unacceptably adverse impact on the important views. As demonstrated above, and indeed as will be demonstrated through the formal submission, that threshold is not met here, particularly in relation to View 3.</p>	<p>perceptions of open countryside, landscape and features of significance or beauty within the view and at its distant closure. Historic landscape experience is not a factor (except for landscape historians) for most people. Also, a particular view/viewpoint will be significant mainly to the part of the community who live close to, or frequent an open spaces which provides the viewpoint – including residents of relatively new development. Finally, View 6 overlooks a proposed Area of Separation (emerging Local Plan) with a strategic development allocation in the distance. Masterplanning of the latter can be expected to respect View 6</p>	
17		ENV10	Davidson s/Jelsons	<p>As drafted, however, the policy departs from the approach promulgated within national planning policy and overextends, appearing to impose a blanket requirement on development in the defined areas to demonstrate that the benefits of development outweigh the harm in</p>	<p>We assume the reference is intended to be to figure 15.</p> <p>All new development must comply with national legislation and the NPPF in respect of flood risk and the</p>	None

				<p>relation to its adverse impact on climate change targets. That does not accurately reflect the exceptions test in national planning policy which, in any event, is not required in every case. Simply, Policy ENV10 is more onerous, more rigid and less proportionate than national planning policy and makes reference to 'climate change targets' which, the respondents opine, is too vague.</p> <p>3.58 The second point the respondents wish to make is that flood zone extents are dynamic and subject to change. That is particularly so where modelling, data inputs and climate change assumptions continue to evolve. In this respect, placing reliance on 'Figure 14' is to place reliance on a snapshot in time that risks becoming obsolete. Figure 14 and reference to it should be deleted.</p>	<p>environment generally, as affected by climate change.</p> <p>Any development proposals requiring the exception test following an SFRA and sequential test will be dealt with on a case-by-case basis as part of the Planning process. Figure 15 is intended to identify locations where fluvial or surface water flooding is a known issue – by doing this it 'adds local detail' to the relevant Harborough Council policies. It is no more a 'snapshot' of flood risk than the Environment Agency modelling and mapping on which it is based – which in any case includes an allowance for climate change.</p>	
17		ENV11	Davidson s/Jelsons	<p>Policy ENV11 sets out that proposals for renewable energy generation infrastructure will be supported in the areas mapped in Figure 17 and subject to specified mitigation and conditions (as prescribed within the policy text). 3.60 We have significant reservations regarding the identification of land</p>	<p>The policy says that development in these areas 'will be supported' (irrespective of technical or other impediments, which the community has deliberately avoided attempting an assessment of). It is for potential</p>	None

				<p>immediately east of the emerging Scraftoft East allocation for renewable energy infrastructure, such as wind turbines or solar arrays. This land will lie in very close proximity to new residential areas, introducing highly sensitive receptors. In such a context, there is a clear potential for adverse amenity impacts, including glint and glare from solar installations and, in the case of wind turbines, effects such as shadow flicker, noise, and overshadowing. 3.61</p> <p>Given these sensitivities, locating renewable energy development in this area would risk creating incompatible land uses in close proximity to one another. The designation of land to the east of Scraftoft East for renewable energy should therefore be deleted.</p>	<p>developers to take such matters into account when selecting locations for renewables infrastructure proposals. The sub-paragraphs of ENV 11 deal with the other matters mentioned</p>	
17		IN1	Davidson s/Jelsons	<p>the policy requirement (in Policy IN1) to fund alternative/additional provision at Fernvale Primary School is not justified and risks undermining the eLP [emerging HDC Local Plan] strategy. 3.68</p> <p>Policy IN1 should also reference Regulation 122 of the CIL Regulations 2010 (as amended) when explaining the lawful basis for seeking planning obligations. In the absence of reference to Regulation 122, Policy IN1 reads as though contributions must be secured for all</p>	<p>Policy IN1 identifies the local priorities for infrastructure should development occur and is considered to be a helpful guide to those submitting planning applications.</p> <p>It does not seek to block development which fails to provide such measures.</p>	None

				listed items, regardless of the statutory tests and lawfulness of any such requests.		
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