

# Scraptoft Review Neighbourhood Plan

## Summary of representations submitted by Harborough District Council to the independent examiner pursuant to Regulation 17 of Part 5 of The Neighbourhood Planning (General) Regulations 2012

	Name	Policy /Page	Full Representation
1	Harborough District Council	<p>Policy HBE2</p> <p>Policy HBE5</p> <p>ENV4 and ENV5</p> <p>ENV6 ENV8</p>	<p>The District Council made extensive comments at Regulation 14 consultation. Many of the comments were used by the QB to amend the policies, however a number have not been taken into account. Those comments that have not been used are repeated here for consideration. Page references have been amended to take account of the submission version</p> <p><b>Suggested amended text:</b>  <i>“New housing should provide a mix of types and sizes to meet local needs. Smaller homes (three bedrooms or fewer) and homes suitable for older people will be supported.”</i></p> <p><b>Suggested amended text to be more concise:</b>  <i>Development must demonstrate high-quality design that respects local character. Proposals should reference the Scraptoft Design Guide and justify any deviation.</i></p> <p><b>Combine into one concise policy:</b>  <i>e.g Development must deliver at least 10% biodiversity net gain and protect identified habitats and wildlife corridors (Figures 8 &amp; 9). Where harm cannot be avoided or mitigated, permission will be refused.</i>  <i>All proposals must consider potential bat habitats on or near the site and:</i></p> <ul style="list-style-type: none"> <li>• <i>Avoid external lighting in known bat areas unless essential.</i></li> <li>• <i>Retain trees in bat habitats unless removal is unavoidable.</i></li> <li>• <i>Apply best-practice lighting mitigation (dark buffers, low illuminance, screening).</i></li> </ul> <p><i>ENV6–ENV8 (Heritage &amp; Ridge and Furrow)</i>  <i>The policies all deal with heritage and might be more concisely expressed if combined. Much of the current policy wording could be included in the body of the Plan as explanatory text.</i></p> <p><i>Combine key points:</i>  <i>Suggested policy text</i>  <i>Development affecting heritage assets (figures 10, 11 and 12) or ridge and furrow (figure 13.3) must demonstrate that public benefits clearly outweigh harm.</i></p>

		ENV10	<p><b>Flood Risk</b>  <b>The current policy is very long with technical information and some repetition</b></p> <p><b>Suggested revision</b>  <i>Development in identified flood risk areas (Figure 14) will only be supported where:</i></p> <ul style="list-style-type: none"> <li>• <i>No alternative site is available.</i></li> <li>• <i>A hydrological study informs design and construction.</i></li> <li>• <i>A Surface Water Drainage Strategy demonstrates no increased flood risk on-site or elsewhere, accounting for climate change.</i></li> <li>• <i>Sustainable drainage systems (SuDS) with maintenance provision are included, using permeable surfaces and, where possible, habitat creation.</i></li> <li>• <i>The proposal does not increase flood risk to third parties</i></li> </ul> <p><i>Proposals for new or improved flood management infrastructure (e.g., ditches, gullies, retention pools) will be supported if they do not harm important open spaces or heritage/natural sites.</i></p>
		ENV11	<p><i>To be more concise the policy could be revised</i></p> <ul style="list-style-type: none"> <li>• <b>Suggested Modification:</b>  <i>Proposals for up to <b>two wind turbines (max 30m tip height)</b> and/or <b>one solar array (up to 10ha)</b> in the areas shown on Figure 16 will be supported where they:</i> <ul style="list-style-type: none"> <li>○ <i>Avoid significant harm to residential amenity, landscape character, key views, biodiversity, and heritage assets.</i></li> <li>○ <i>Include a strategy for <b>10% biodiversity net gain</b>.</i></li> <li>○ <i>For solar arrays, provide assessments covering transport, heritage, landscape, flood risk, ecology, and tree protection.</i></li> </ul> </li> </ul> <p><i>Larger proposals than noted above will not be supported.</i></p>
		CF1	<p><i>The policy might be more concisely expressed with the following text</i>  <b>Policy CF1: Community Facilities</b></p> <ul style="list-style-type: none"> <li>• <i>Loss of community facilities (Community Hub, Village Hall, Co-op Store, Post Office, Village Store, All Saints Church, White Horse Pub) will only be supported where:</i> <ul style="list-style-type: none"> <li>○ <i>There is no proven need or demand;</i></li> <li>○ <i>The facility is not viable and no alternative community use exists; or</i></li> <li>○ <i>An equivalent or better facility is provided within the Parish.</i></li> </ul> </li> <li>• <i>Small-scale proposals to enhance facilities (e.g., healthcare, pharmacy, youth provision) will be supported if they:</i> <ul style="list-style-type: none"> <li>○ <i>Do not cause unacceptable noise, traffic, or pollution; and</i></li> <li>○ <i>Provide adequate off-road parking; and</i></li> </ul> </li> </ul> <p><i>Respect local character and protect residential amenity</i></p>
		E1 -E3	<p><i>Consider combining into one streamlined policy:</i></p> <p><i>e.g</i></p> <ul style="list-style-type: none"> <li>• <i>Loss of existing employment sites will only be supported where the use is proven unviable and no alternative employment use exists.</i></li> <li>• <i>New employment development, home-based businesses, and reuse of agricultural or commercial buildings will be supported where proposals:</i> <ul style="list-style-type: none"> <li>• <i>Are appropriate to the location and respect local character;</i></li> <li>• <i>Do not cause significant harm to residential amenity, heritage, or the environment;</i></li> </ul> </li> </ul>

		<p>E5</p> <p>T1</p> <p>IN1</p>	<ul style="list-style-type: none"> <li>• Provide adequate parking and safe access without creating severe traffic impacts;</li> <li>• Avoid unacceptable noise, light, or other pollution;</li> <li>• Include measures to manage flood risk where relevant.</li> </ul> <p><b>The policy might be expressed more concisely</b></p> <p><i>e.g. Proposals to improve broadband and mobile coverage will be supported. New masts should be shared by multiple providers where possible and located sensitively to avoid visual intrusion in open landscapes</i></p> <p><b>The policy might be improved and clarified as set out below</b></p> <p>Major developments must:</p> <ul style="list-style-type: none"> <li>• Ensure traffic impacts are not severe or are mitigated;</li> <li>• Provide safe access and adequate off-street parking (minimum 2 spaces per dwelling, 3 for 4+ bedrooms);</li> <li>• Include public transport improvements and safe pedestrian/cycle links integrated with existing networks;</li> <li>• Retain or appropriately divert rights of way;</li> <li>• Provide travel packs to promote sustainable transport options</li> </ul> <p><b>The policy might be improved with the following text to make it more concise for decision makers</b></p> <p>New development must contribute to necessary infrastructure, including:</p> <ul style="list-style-type: none"> <li>• Additional school places;</li> <li>• Sports and recreation facilities (including allotments);</li> <li>• Healthcare and pharmacy provision;</li> <li>• Facilities for older children;</li> <li>• Traffic calming measures.</li> </ul> <p>Contributions should be phased to ensure timely delivery. Requirements will be applied flexibly where viability is an issue.</p> <p><b>Spelling and Typographical Errors</b></p> <ul style="list-style-type: none"> <li>• Page 5: “adversely affect” → should be “adversely affected”.</li> <li>• Page 6 POLICY ENV 9: IMPORTANT VIEWS: “he views” → should be “the views”.</li> <li>• Page 50 policy T1 a: “mitigate on measures” → should be “mitigation measures”.</li> <li>• Page 47 Working from Home first paragraph: “omissions” → should be “emissions”.</li> <li>• Page 51: Policy reference “T4” should be “T2” (Electric Vehicles).</li> <li>• Page 51 section 4 third paragraph: “NP REVIEWPF” → typo, should be “NP Review”.</li> </ul> <p>Conservation Officer comments  P.33 Non Designated Heritage Assets - MLE29196 Scraftoft Lodge Farm (partly in ruin?) is in the list and on Fig 12 but when I searched the HER I could not find it.</p> <p>Best practice is to include a photograph and some information on the asset to help the reader understand its significance. It is possible to use a hyperlink to the entry on the HER for the non-designated assets and on the Historic England website for designated assets.</p>
2	Marrons, on behalf of On		1. Introduction

	<p><b>Behalf of Davidsons Developments and Jelson Homes</b></p>	<p><b><u>Overview</u></b></p> <p>1.1. Marrons is instructed by Davidsons Developments and Jelson Homes (“the respondents”) to act on their behalf in preparing these representations in response to the Scraptoft Neighbourhood Plan Review (“the SNPR”) 2025 - 2041 Regulation 16 Consultation. These representations express our client’s interests at Scraptoft East (“the Site”). A more complete analysis of the subject Site is provided in Chapter 4 of these representations, and a Site Location Plan is annexed to these representations (Appendix A) which depicts the Site’s extents.</p> <p>1.2. Davidsons Developments and Jelson Homes are both well-established housebuilders with strong roots in Leicestershire and the wider East Midlands. Davidsons Developments, a family-owned business established in 2007, has built a reputation for delivering high-quality, character-led developments that reflect the qualities of traditional towns and villages. Similarly, Jelson Homes, founded in 1889, is a long-standing local firm with a proven track record of delivering residential schemes and creating sustainable communities. Both developers are highly familiar with the character and context of the local area and are committed to delivering high-quality development that responds positively to its surroundings.</p> <p>1.3. As such, the respondents have extensive experience of delivering residential development to a high standard across the Leicestershire region. The Site is being promoted by two reputable and experienced housebuilders, providing a high degree of confidence in its deliverability.</p> <p>1.4. In the present case, the respondents are promoting the Site for a residential-led development, a promotion process has culminated in the Site being the subject of a draft allocation in the emerging Harborough Local Plan 2020 – 2041<sup>1</sup> (“eLP”). In parallel, our clients have also undertaken a comprehensive suite of master planning and technical work to support the delivery of the Site which has concluded in the submission an outline planning application being submitted to Harborough District Council (“HDC”) (Ref. 26/00289/OUT) under the following description of development;</p> <p><i>“Outline planning permission with all matters reserved apart from access for up to S50 units including Later Living Accommodation (Use Class C3); 2FE primary school with</i></p>
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			<p><i>early years provision (Use Class F1); public open space; drainage system, landscaping, habitat creation, ground works, internal roads/routes; and associated infrastructure”</i></p> <p>1.5. The application is currently under determination, with the respondents also having commenced the detailed work necessary to support subsequent future Reserved Matters applications, demonstrating a clear commitment to delivery.</p> <p>1.6. In summary, the Site is available, suitable and achievable, and represents a logical and sustainable extension to Scraptoft, capable of delivering a proportionate level of growth that responds to both local and district-wide housing needs, while assimilating into its surroundings.</p> <p><b><u>The Regulation 14 Consultation</u></b></p> <p>1.7. Scraptoft Parish Council, as the ‘qualifying body’ prepared and published the draft SNPR (including the evidence base which has informed it to date) for consultation between the 4th December 2025 and the 23rd January 2026.</p> <p>1.8. The material published for the Regulation 14 Consultation comprised of the following:</p> <ul style="list-style-type: none"> <li>• The draft Scraptoft Neighbourhood Plan Review 2025 – 2041;</li> <li>• Scraptoft Housing Needs Assessment (“HNA”) (Appendix 1);</li> <li>• Scraptoft Parish Council Design Guidance and Codes 2025 (Appendix 2);</li> <li>• Local Green Spaces and Open Space, Sport and Recreation Sites (Appendix 3); and</li> <li>• Important Views in Scraptoft (Appendix 4)</li> </ul> <p>1.9. Following the Regulation 14 consultation, Scraptoft Parish Council published a Consultation Statement which set out the persons and bodies consulted, the methods of consultation undertaken, a summary of the main issues and concerns how those issues have been considered and, where appropriate, addressed within the submitted version of the SNPR.</p> <p>1.10. Marrons, on behalf of the respondents, submitted detailed representations in response to the Regulation 14 consultation (dated 23rd January 2026). Those representations engaged with the vision, objectives and</p>
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			<p>policies of the draft SNPR, and set out the benefits of the Site alongside a number of substantive concerns.</p> <p>1.11. In particular, the Regulation 14 representations raised concerns in relation to a number of key policy areas, including: the proposed settlement boundary (Policy HBE1); housing mix (Policy HBE2); affordable housing (Policy HBE3); sites of natural and environmental significance (Policy ENV4); biodiversity and habitat connectivity (Policy ENV5); sites of historic significance (Policy ENV6); important views (Policy ENV9); and renewable energy generation infrastructure (Policy ENV11).</p> <p><b><u>The Regulation 16 Consultation</u></b></p> <p>1.12. Scraptoft Parish Council has submitted the Scraptoft Neighbourhood Plan Review to Harborough District Council (“HDC”) as the Local Planning Authority (“LPA”), for independent examination. HDC are now undertaking the statutory Regulation 16 consultation between 18th March 2026 and 29th April 2026.</p> <p>1.13. In accordance with regulations<sup>2</sup> the following documents have been submitted by Scraptoft Parish Council in support of the SNPR.</p> <ul style="list-style-type: none"> <li>• Scraptoft NDP Review - submission version plan</li> <li>• Scraptoft Review Consultation Statement with Reg 14 responses</li> <li>• Scraptoft Review Basic Conditions Statement</li> <li>• Scraptoft Neighbourhood Area plan</li> <li>• Qualifying Body Statement of modifications Scraptoft NDP Review</li> </ul> <p>1.14. As this document constitutes a review of the adopted Scraptoft Neighbourhood Plan (2015–2028), both Scraptoft Parish Council and HDC have prepared and published a statement of modification. This statement confirms that the proposed changes to the Scraptoft Neighbourhood Plan (2015–2028) are substantive in nature and amount to material modifications which alter the nature of the existing plan. Accordingly, it has been agreed that the SNPR should proceed to independent examination and subject to that process, a further referendum.</p>
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1.15. In addition, a suite of supporting evidence base documents has been submitted alongside the SNPR. This documentation mirrors that which was previously published as part of the Regulation 14 consultation as set out in paragraph 1.8 above.

1.16. Notwithstanding the consultation undertaken at Regulation 14, these representations are made on the basis that a number of the substantive concerns previously raised on behalf of the respondents have not been adequately addressed through the submitted version of the SNPR. Whilst it is acknowledged that some amendments have been made, these do not go far enough to resolve key issues of principle. Accordingly, the concerns raised at Regulation 14 are maintained and, where relevant, are reiterated and expanded upon within these Regulation 16 representations.

### **Structure of Representations**

1.17. These representations are to be structured as follows:

- The Statutory and Policy Framework;
- Site Context and Characteristics;
- The SNPR Policies;
- Site Benefits; and
- Conclusion.

2. The Statutory and Policy Framework

### **The Statutory Framework**

2.1. These representations have regard to the statutory framework which governs the preparation, modification and examination of neighbourhood plans. For clarity, this section focuses on those elements of the legislative framework which are most relevant to the consideration of the SNPR at this Regulation 16 stage.

2.2. Neighbourhood planning was introduced through the Localism Act 2011, which enables qualifying bodies to prepare Neighbourhood Development Plans (“NDPs”) to guide development at a local level. Once ‘made’, such plans form part of the statutory development plan and are used alongside Local Plans in the determination of planning applications.

		<p>2.3. In this instance, the SNPR represents a review of the ‘made’ Scraftoft Neighbourhood Plan (2015–2028). As such, it is subject to the provisions of Schedule A2 to the Planning and Compulsory Purchase Act 2004, which sets out the process for the modification of NDPs.</p> <p>2.4. As part of that process, the Examiner must first consider whether the proposed modifications materially change the nature of the existing plan. In this case, both Scraftoft Parish Council and Harborough District Council have confirmed that the changes are substantive and amount to material modifications.</p> <p>2.5. Where modifications are of this nature, the examination should be undertaken against the ‘basic conditions’, as applied through Schedule 4B to the Town and Country Planning Act 1990. In simple terms, this requires the Examiner to consider whether the plan is appropriate having regard to national policy, contributes to sustainable development and is in general conformity with the strategic policies for the area. These basic conditions are set out below for clarification;</p> <ul style="list-style-type: none"> <li>a) <i>Having regard to National Policies and Advice contained in guidance issued by the Secretary of State</i></li> <li>b) <i>Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses;</i></li> <li>c) <i>Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area;</i></li> <li>d) <i>The making of the Neighbourhood Plan contributes to the achievement of sustainable development;</i></li> <li>e) <i>The making of the Neighbourhood Plan is in general conformity with the strategic policies contained in the Development Plan;</i></li> <li>f) <i>The making of the Neighbourhood Plan does not breach, and is otherwise compatible with, EU obligations; and</i></li> </ul>
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		<p>g) <i>Prescribed conditions are met in relation to the Neighbourhood Plan and prescribed matter have been complied with in connection with the proposal for the Neighbourhood Plan</i>”.</p> <p>2.6. Accordingly, whilst the legislative route for modification is set out under Schedule A2, the substantive test for the purposes of this examination remains whether the SNPR meets the basic conditions. This is the key consideration which underpins the comments set out within these representations.</p> <p><b><u>National Planning Policy Framework</u></b></p> <p>2.7. The National Planning Policy Framework (“NPPF”) sets out the Government’s overarching planning policies and is a key material consideration in both plan- making and decision-taking.</p> <p>2.8. Paragraph 16 of the NPPF (December 2024) confirms that plans should be prepared positively, in a way that is both aspirational and deliverable, and should contribute to the achievement of sustainable development. Policies should be clearly written, unambiguous and avoid unnecessary duplication of policies that are already addressed at a national or strategic level.</p> <p>2.9. Importantly in the context of neighbourhood planning, the NPPF is clear that NDPs should support the delivery of strategic policies contained within Local Plans and should not undermine those policies or promote less development than is identified at the strategic level.</p> <p>2.10. Paragraph 38 of the NPPF confirms that neighbourhood plans must meet the basic conditions (set out in paragraph 2.5) before they can come into force, with this being tested through the independent examination process.</p> <p><b><u>Planning Practice Guidance</u></b></p> <p>2.11. The Planning Practice Guidance (“PPG”) provides further guidance on the application of national policy and is an important material consideration alongside the NPPF.</p> <p>2.12. PPG (Paragraph 009, Reference ID: 41-009-20190509) provides clear direction on the relationship between NDPs and Local Plans. It confirms that, whilst neighbourhood plans are not formally tested against emerging Local Plan policies, the evidence base and strategic direction</p>
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			<p>underpinning those plans are directly relevant to the assessment of whether the basic conditions are met.</p> <p>2.13. The PPG also emphasises the need for NDPs and Local Plans to work together, with plan-makers encouraged to minimise any conflict between policies. This is particularly important where an emerging Local Plan is at an advanced stage, as is the case with Harborough District Council whose eLP was resolved to be submitted to examination on the 16 March 2026.</p> <p>2.14. In this respect, it is important that NDP policies do not cut across or undermine the strategic approach to growth, including site allocations and infrastructure planning, which are being progressed at the District level.</p> <p><b><u>Summary and Approach to these Representations</u></b></p> <p>2.15. Against this statutory and policy context, these representations focus on whether the SNPR, as submitted, satisfies the basic conditions. In particular, regard is had to whether the SNPR:</p> <ul style="list-style-type: none"> <li>• has appropriate regard to national policy and guidance;</li> <li>• contributes to the achievement of sustainable development; and</li> <li>• is in general conformity with the strategic direction of growth for the area.</li> </ul> <p>2.16. In doing so, particular weight is given to the eLP, including the identification of the Site as a draft allocation, and the extent to which the policies of the SNPR support, or alternatively risk constraining, its delivery.</p> <p>2.17. Where policies are considered to go beyond the role of a NDP, introduce unnecessary duplication, or create potential conflict with strategic policy, these representations seek to identify those issues and propose amendments to ensure that the SNPR can proceed in a manner which is consistent with the basic conditions.</p> <p>3. The SNPR Policies</p> <p>3.1. The Foreword to the SNPR sets out the rationale for undertaking a review of the ‘made’ Scraftoft Neighbourhood Plan (2015–2028), which outlines that a number of legislative and policy changes have arisen since its adoption which warrant reconsideration of the Plan’s content.</p>
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- 3.2. It is acknowledged that Scruptoft Parish Council have taken a proactive approach in bringing forward the review, with a clear focus on assessing how effectively the existing policies have operated in practice and whether updates or refinements are necessary.
- 3.3. The respondents support the principle of reviewing the SNRP in this context. In particular, ensuring that the SNRP remains up-to-date and aligned with the current planning framework, including national policy and the eLP, is both appropriate and necessary.
- 3.4. However, it is important that the outcome of this review process fully reflects the current strategic direction of growth. As set out in the preceding sections, this includes ensuring that the SNRP does not introduce policies which could inadvertently constrain or undermine the delivery of development identified through the eLP,

### **SNPR Vision and Objectives**

- 3.5. The SNPR sets out a broad vision for the Parish up to 2041, supported by a range of objectives relating to matters such as protecting the identity of Scruptoft, improving accessibility and community infrastructure, safeguarding open space, and managing traffic.
- 3.6. These objectives are, in general terms, supported and reflect a positive ambition to guide development in a manner which responds to local characteristics and community priorities.
- 3.7. Notwithstanding this, it is noted that the vision and objectives remain relatively limited in their reference to the role of Scruptoft in accommodating future growth, particularly in the context of its identification as a sustainable location for development within the eLPs emerging spatial strategy.
- 3.8. There is limited explicit recognition of the need to contribute towards meeting housing needs, including the delivery of both market and affordable housing. This is an important omission given the national objective to significantly boost the supply of homes, alongside well-documented affordability pressures across the District.
- 3.9. In this respect, it is considered that the vision and supporting objectives should be strengthened to more clearly reflect:
  - the role of the Parish in accommodating planned growth;
  - the need to support the delivery of allocated sites; and

- the importance of providing a mix of housing, including affordable homes.

3.10. Providing greater clarity in this regard would ensure that the SNPR aligns more closely with national policy and the eLP and provides a more robust framework for the assessment of development proposals over the plan period.

**Plan Period**

3.11. The SNPR confirms a plan period extending to 2041, aligning with that of the eLP. The respondents support this approach as aligning the plan period with eLP provides a clear and consistent strategic context, ensuring that the SNPR remains relevant over the same timeframe as the District-wide strategy.

3.12. This alignment also allows the SNPR to appropriately respond to longer-term growth requirements, including housing delivery, infrastructure provision and demographic change, whilst providing greater certainty for communities, landowners and developers.

**Housing Provision**

3.13. The SNPR adopts a positive approach to development, reflecting the presumption in favour of sustainable development and recognising the need to accommodate future growth within the Parish.

3.14. In doing so, it appropriately references the eLP, including the identified housing requirement for the District and the role of Scruptoft as a sustainable ‘Tier 1’ settlement adjoining the Leicester Urban Area.

3.15. Importantly, the SNPR recognises the allocation of sites within Scruptoft, including Scruptoft East and Land at Beeby Road, and acknowledges that these will deliver the housing requirement for the Parish over the plan period.

3.16. The respondents support this position and welcome the Parish Council’s recognition of the role of these sites, including the subject Site, within the emerging spatial strategy.

3.17. On this basis, the decision not to allocate additional sites through the SNPR is supported, reflecting a proportionate

			<p>approach which aligns with the strategic planning framework.</p> <p>3.18. The SNPR also recognises the delivery challenges associated with the Scraptoft North allocation (formally policy SC1), and the uncertainty surrounding its implementation. This provides important context in understanding the role of other sites in meeting housing needs and at the time of writing this representation it should be noted that the application for the Scraptoft North Site has now been ‘disposed of’ by the LPA.</p> <p>3.19. Overall, the approach taken to housing provision is considered to broadly align with the direction of travel set out in the eLP and is supported.</p> <p><b><u>Policy HBE1 Settlement Boundary</u></b></p> <p>3.20. Policy HBE1 has been subject to amendment since the Regulation 14 consultation. In particular, the respondents note the inclusion of additional wording which confirms that the settlement boundary does not apply to land allocated for strategic development within the eLP (in this case Scraptoft East - Policy SA04).</p> <p>3.21. This amendment is welcomed and represents a positive step forward. It appropriately recognises the role of strategic allocations and ensures that such proposals are not unduly constrained by the application of a tightly drawn settlement boundary.</p> <p>3.22. Notwithstanding this positive change, a number of concerns remain in respect of the drafting and application of Policy HBE1 which, as currently worded, give rise to ambiguity and risk conflict with national policy and the wider strategic planning framework.</p> <p>3.23. The policy continues to state that development outside the defined settlement boundary will only be permitted where “special circumstances” can be demonstrated. This approach is not supported as there is no basis within the NPPF or the development plan for applying a “special circumstances” test. This terminology is typically associated with Green Belt policy and sets an inappropriately high and unjustified bar for development proposals coming forward outside settlement boundaries.</p> <p>3.24. Furthermore, paragraph 16 of the NPPF requires that policies are clearly written and unambiguous, so that it is evident how a decision-maker should react to development</p>
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proposals. In its current form, Policy HBE1 does not achieve this. The reference to “special circumstances” is undefined and open to interpretation, creating uncertainty and failing to provide a clear and consistent framework for the assessment of development proposals.

3.25. Whilst the exclusion of strategic allocations from the settlement boundary is noted, the supporting wording introduces further ambiguity. In particular, the requirement that development will be guided by an “approved masterplan” lacks clarity. It is unclear who is responsible for approving such a masterplan, at what stage this approval is expected, and how this requirement relates to the established planning application process. In practice, development of this scale will be supported by a comprehensive set of plans submitted as part of an outline and then subsequent reserved matters applications and considered by the LPA. As such, the inclusion of this requirement does not provide additional clarity and risks introducing confusion.

3.26. The SNPR recognises that the Site forms part of the emerging spatial strategy through its identification as a draft allocation. However, the continued application of a restrictive approach to development outside the settlement boundary risks creating tension with that strategy, particularly where the policy is framed in negative terms. As set out within PPG Guidance, neighbourhood plans should seek to minimise conflict with emerging Local Plans and support the delivery of strategic policies.

3.27. In summary, whilst the amendments made at Regulation 16 are welcomed, Policy HBE1 remains inconsistent with national policy and risks failing the basic conditions in respect of clarity, conformity with strategic policy and support for sustainable development. The policy should therefore be amended to remove the reference to “special circumstances”, adopt a more positive and flexible approach to development, and provide greater clarity in relation to the role of the masterplanning requirement.

#### Policy HBE2 Housing Mix

3.28. Policy HBE2 remains unchanged from the version presented at Regulation 14. The policy seeks to ensure that, where practicable and viable, new housing development proposals provide a mixture of housing types to meet identified and evidenced local needs. Whilst the principle of responding to housing needs evidence is supported, the policy, as currently drafted, is overly narrow in its focus.

- 3.29. In particular, the emphasis on “local” needs does not adequately reflect the broader role of development in contributing towards meeting housing requirements at a District level. Housing needs evidence is not static and is subject to regular review and updating, and there will inevitably be circumstances where development proposals must respond to both local and wider strategic needs.
- 3.30. Furthermore, the policy does not sufficiently recognise the importance of site- specific considerations, including viability, market demand and characteristics of, all of which play a key role in determining an appropriate housing mix.
- 3.31. In this respect, the policy would benefit from greater flexibility to ensure that it can be applied in a proportionate and consistent manner. Accordingly, it is recommended that the reference to “local” needs is removed, and that the policy is amended to better reflect the need to respond to both local and wider housing requirements, having regard to up-to-date evidence and site-specific circumstances.

**POLICY HBE3: AFFORDABLE HOUSING**

- 3.32. Policy HBE3 has been subject to minor amendments since the Regulation 14 consultation, however the overall approach and intent of the policy remain largely unchanged.
- 3.33. The policy seeks to secure a mix of affordable housing types and sizes to meet identified needs within the Parish, drawing on the Housing Needs Assessment (“HNA”) (January 2025). It also recommends a tenure split of 60% social/affordable rent and 40% affordable home ownership. Whilst the objective of delivering a policy-compliant and policy-responsive mix of affordable housing is supported in principle, the current drafting lacks sufficient clarity and flexibility in how this is to be applied in practice.
- 3.34. In particular, through the Consultation Statement the Parish Council considers that the use of terms such as “should”, “recommends” and “supports” provides flexibility, this is not considered to be the case when read as a whole. The policy still establishes a relatively prescriptive framework, without clearly setting out how decision-makers should balance the HNA findings against other material considerations, including up-to-date evidence, site-specific characteristics and viability.

		<p>3.35. Furthermore, the HNA itself addresses a broad range of housing needs and does not provide specific guidance in respect of affordable housing mix. For example, whilst overall housing mix recommendations are provided, these are not clearly differentiated between market and affordable tenures. As such, it remains unclear how applicants are expected to apply this evidence in a consistent and proportionate manner.</p> <p>3.36. In line with Policy HBE2, the policy should therefore make explicit reference to the need to consider viability and practicability, as well as site-specific circumstances, to ensure that it can be applied flexibly in a manner consistent with national policy.</p> <p>3.37. The policy also requires that affordable housing is “indistinguishable” from market housing and “distributed evenly” throughout a development. Whilst the principle of tenure blindness is supported, the requirement for even distribution is not reflective of how development is delivered in practice. A more appropriate approach would be to ensure that affordable housing is distributed in a way which avoids undue concentration, whilst having regard to practical considerations such as site layout, management and delivery.</p> <p>3.38. In summary, whilst the policy has been subject to minor amendment, it remains prescriptive and lacks the degree of flexibility suggested by the Parish Council. Amendments are therefore required to ensure that the policy can be applied in a clear, proportionate and deliverable manner, consistent with national policy and the basic conditions.</p> <p><b><u>POLICY HBE5: BUILDING DESIGN PRINCIPLES</u></b></p> <p>3.39. Policy HBE5 remains unchanged from the version presented at Regulation 14 stage. The policy requires all development proposals to demonstrate a high quality of design, layout and use of materials which make a positive contribution to the character of the Neighbourhood Area. Further requiring that proposals make specific reference to how the design guide and codes have been considered, and that any deviation from those documents should be justified.</p> <p>3.40. Whilst the objective of securing high quality design is supported in principle, the policy as drafted operates in an overly rigid manner. In particular, the requirement that any deviation from the design guide and codes must be justified</p>
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sets an unnecessarily high threshold, for which there is no clear justification.

3.41. Requiring all deviations, irrespective of their scale, relevance or material impact, to be justified introduces a level of inflexibility which is not appropriate. It fails to recognise that design guidance should be applied proportionately. In this respect, the policy risks constraining otherwise acceptable and well-designed development, and does not fully align with the NPPF and more directly paragraph 133 which requires that design guidance "should allow a suitable degree of variety."

3.42. Accordingly, it is recommended that the requirement to justify any deviation from the design guide and codes is removed, to ensure that the policy can be applied in a proportionate and flexible manner, consistent with national policy and the basic conditions.

#### **POLICY ENV1: AREA OF SEPARATION**

3.43. Policy ENV1 has been subject to amendment since the Regulation 14 consultation. The respondents note that the policy has been refined to clarify that "separation" comprises both physical and visual components. These changes are acknowledged and represent a degree of positive movement in response to earlier concerns.

3.44. Notwithstanding these amendments, the overall approach and intent of the policy remain largely unchanged, and the concerns previously raised are therefore maintained.

3.45. In particular, the extent of the Area of Separation ("AoS") now broadly corresponds with the area identified as "Green Wedge" within the eLP under emerging Policy DS04. The Green Wedge designation performs a strategic function, including the prevention of coalescence between settlements and the maintenance of openness.

3.46. In this respect, the AoS designation introduced through Policy ENV1 appears to duplicate the role and function of the Green Wedge as defined at the strategic level. This results in an unnecessary overlap between SNPR policy and eLP policy, without adding any meaningful distinction in policy application.

3.47. Paragraph 16(f) of the NPPF is clear that plans should serve a clear purpose and avoid unnecessary duplication of policies. Similarly, PPG Guidance emphasises that NDPs

should complement rather than replicate the policies contained within Local Plans.

3.48. The inclusion of Policy ENV1 therefore risks creating confusion and policy tension, particularly where decision-makers are required to apply two overlapping designations which seek to achieve the same objective.

3.49. Furthermore, given the Site's identification as a draft allocation within the eLP, the imposition of an additional layer of policy constraint through the AoS has the potential to conflict with the strategic direction of growth and the delivery of allocated development. It is therefore considered that the policy and associated designation should be removed to ensure alignment with national policy, avoid duplication, and support the delivery of the strategic spatial strategy.

#### **POLICY ENV4: SITES OF NATURAL ENVIRONMENT SIGNIFICANCE**

3.50. Policy ENV4 has not been subject to any further amendment since the Regulation 14 consultation. The policy identifies several sites and features as being of local significance for the natural environment and seeks to restrict development affecting them unless the value of the development is demonstrated to outweigh their biodiversity significance. It also requires proposals to deliver measurable Biodiversity Net Gain ("BNG") of at least 10%.

3.51. At the outset, it is noted that there remains an erroneous reference within the policy to "Figure 6", when the supporting plan is clearly "Figure 8". This creates uncertainty and should be corrected in the interests of clarity.

3.52. In addition, the evidence base underpinning the designation is not accurately reflected. For example, Scraftoft Grassland and Station Lane Oak are understood to be candidate Local Wildlife Sites rather than formally designated sites. This distinction is important and should be clearly acknowledged within both the policy and supporting text to ensure that the policy is applied proportionately.

3.53. More fundamentally, the first part of the policy largely duplicates the approach set out in Policy GI5 of the adopted Harborough Local Plan. Whilst both policies seek to balance the value of biodiversity against the benefits of development, Policy ENV4 introduces an alternative and less precise test, referring to the "value of the development" rather than the "need for, and benefits of, the development in that location."

			<p>This creates unnecessary divergence and potential conflict within the development plan.</p> <p>3.54. In this respect, there is no clear justification for replicating or modifying an existing development plan policy at NDP level. Paragraph 16(f) of the National Planning Policy Framework is clear that plans should avoid unnecessary duplication, and PPG Guidance reinforces that neighbourhood plans should complement, rather than repeat, Local Plan policies.</p> <p>3.55. Furthermore, the policy does not adequately recognise that the Site forms part of a draft allocation within the eLP. The principle of development in this location has therefore been established through the emerging spatial strategy, and the associated benefits of delivery, including housing provision and infrastructure, are material considerations which must be afforded appropriate weight.</p> <p>3.56. In this context, the policy as drafted, risks applying an overly restrictive framework which does not properly reflect the strategic importance of the Site.</p> <p>3.57. The second part of the policy, relating to Biodiversity Net Gain, also duplicates the existing statutory requirement introduced through the Environment Act 2021, as well as national policy requirements. The inclusion of this requirement within the SNPR does not add substantive value and risks unnecessary repetition within the policy framework.</p> <p><b><u>POLICY ENV5: BIODIVERSITY AND HABITAT CONNECTIVITY</u></b></p> <p>3.58. Policy ENV5 has not been subject to any substantive amendment since the Regulation 14 consultation. The first part of the policy largely duplicates Policy ENV4, which itself repeats elements of national policy and the adopted development plan. As such, this represents a further layer of unnecessary duplication within the Neighbourhood Plan, contrary to NPPF paragraph 16(f).</p> <p>3.59. The second part of the policy states that development proposals which adversely affect trees, woodlands and hedgerows will be resisted. This approach is overly rigid and does not reflect how development is typically brought forward in practice. It is often necessary for proposals to result in some level of impact, for example to facilitate access or achieve an appropriate layout. The policy should therefore be reframed to reflect this established, landscape-</p>
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led approach, rather than applying a blanket presumption against development.

- 3.60. The third part of the policy introduces a series of prescriptive requirements in relation to bats, including measures relating to lighting, tree removal, dark corridors and provision of bat boxes. These requirements are not supported. The presence of protected species, and any necessary mitigation, is a matter to be determined through site-specific survey work, typically informed by a preliminary ecological appraisal. Applying such measures in a blanket and pre-emptive manner to all development proposals is neither proportionate nor consistent with national policy or best practice.
- 3.61. The policy also seeks to protect and enhance wildlife corridors as identified within Figure 9.1. However, it is not clear how these corridors have been defined or evidenced. It appears that these corridors align with areas of Green Wedge or separation, which are not ecological designations and are not defined on the basis of biodiversity value or habitat connectivity.
- 3.62. In this respect, paragraph 32 of the NPPF is clear that policies should be underpinned by relevant and up-to-date evidence which is adequate and proportionate to justify the approach taken. The absence of a clear evidence base to support the identification of wildlife corridors calls into question the soundness of this element of the policy.

**POLICY ENV6: SITES OF HISTORIC ENVIRONMENT SIGNIFICANCE**

- 3.63. Policy ENV6 has not been subject to any substantive amendment since the Regulation 14 consultation. The policy and Figure 10 identify several sites as being of at least local significance for their historic and archaeological interest and seeks to resist development which would adversely affect them unless the benefits outweigh the value of the asset.
- 3.64. Whilst it is acknowledged that the sites referenced are recorded within the Leicestershire Historic Environment Record and informed by available data sources, the policy nonetheless risks pre-judging the significance of archaeological remains. The presence of a record or designation does not confirm the level of significance or the extent of remains, which can only be properly established through site-specific investigation.

		<p>3.65. In this respect, the policy goes beyond the established approach set out in the NPPF paragraph 216 which requires the significance of heritage assets, including those of archaeological interest to be assessed on a proportionate, case-by-case basis, having regard to the scale of harm and the benefits of development.</p> <p>3.66. The Parish Council suggests that the policy does not need to provide supporting evidence and that archaeological matters are routinely addressed through the development management process. The respondents agree that such matters are appropriately dealt with on a case-by-case basis however, this reinforces the need for the policy to reflect that approach, rather than pre-empting conclusions on significance.</p> <p>3.67. Accordingly, Policy ENV6 should be re-drafted to recognise the potential for archaeological interest, requiring proportionate investigation and, where necessary mitigation, rather than attributing a fixed level of significance in advance of assessment.</p> <p><b><u>POLICY ENVG: IMPORTANT VIEWS</u></b></p> <p>3.68. Policy ENV9 has been subject to amendment since the Regulation 14 consultation, most notably through the removal of wording relating to development which would “block” identified views. This change is welcomed and represents a more proportionate and less restrictive approach to managing views within the Neighbourhood Area.</p> <p>3.69. The views relevant to the Site are View 3, from Scraptoft Lane junction across the Thurnby Brook valley, and View 6, from Elizabeth Heyrick Drive north across open fields towards Covert Lane and the ridge. The supporting evidence base seeks to justify these views based on their contribution to the perception of Scraptoft as a rural settlement and their value in providing access to, and appreciation of, the surrounding countryside.</p> <p>3.70. In respect of View 3, it is considered that the objectives of the policy can be appropriately addressed through the emerging spatial strategy. The retention of the Green Wedge, as defined within the eLP, will ensure that openness within the valley is maintained and that key aspects of the view are preserved. As such, there is no need for an additional layer of policy constraint, and the policy should</p>
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			<p>recognise that the strategic framework already provides an appropriate mechanism for managing this view.</p> <p>3.71. In contrast, concerns remain in relation to View 6. This viewpoint is taken from the edge of relatively modern development and does not represent a historic or particularly distinctive landscape experience. The evidence base does not clearly demonstrate that this view is of a quality or significance which justifies its inclusion as a protected view within the policy. As currently defined, it appears to function primarily as a constraint on development rather than reflecting a view of demonstrable landscape value.</p> <p>3.72. The Parish Council’s position that views are valued by those who experience them is noted, however this in itself does not provide a sufficient evidential basis for policy designation. In line with national policy, such designations should be supported by proportionate and robust evidence demonstrating their significance.</p> <p>3.73. Furthermore, whilst it is suggested that masterplanning of the Site will respect View 6, this reinforces the point that such matters are more appropriately addressed through the design and layout of development proposals, rather than through the imposition of fixed policy constraints.</p> <p>3.74. Importantly, Policy ENV9 is now framed such that conflict arises only where development would have an unacceptably adverse impact on identified views. The respondents believe this is a more proportionate approach.</p> <p><b><u>POLICY ENV10: FLOOD RISK RESILIENCE</u></b></p> <p>3.75. Policy ENV10 has not been subject to any substantive amendment since the Regulation 14 consultation. The policy requires development proposals within the areas identified (Figure 15) to demonstrate that the benefits of development outweigh the harm in relation to climate change impacts and potential conflict with local flood mitigation strategies and infrastructure.</p> <p>3.76. The respondents find the inclusion of Figure 15 identifying areas of flood risk raises concerns as to its appropriateness and longevity. The Parish Council suggests that this figure provides useful local detail based on Environment Agency data. Whilst this is acknowledged, flood risk is dynamic and subject to ongoing refinement as modelling, data inputs and climate change assumptions evolve. As such, reliance on a static figure within the SNPR risks embedding a snapshot in</p>
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time which may become inconsistent with the most up-to-date evidence used in decision-making.

- 3.77. In policy terms, the approach taken departs from that set out in the NPPF , which applies a sequential approach to flood risk, directing development to areas of lowest risk and only requiring the application of the exception test in specific, clearly defined circumstances.
- 3.78. By contrast, Policy ENV10 appears to introduce a more onerous and wide-ranging requirement, effectively requiring proposals within the identified areas to demonstrate that the benefits of development outweigh harm in relation to climate change impacts. This does not accurately reflect the structure or application of the sequential and exception tests within national policy and risks imposing an additional and unnecessary policy burden.
- 3.79. The Parish Council notes that the exception test will be applied on a case-by-case basis through the planning process. The respondents agree that this is the correct approach however, these further underline that the policy should align with, rather than extend beyond, the established national framework.
- 3.80. In addition, the reference to “climate change targets” is vague and lacks a clear policy hook, making it difficult for decision-makers to apply the policy consistently and with confidence.

**POLICY ENV11: RENEWABLE ENERGY GENERATION INFRASTRUCTURE**

- 3.81. Policy ENV11 has not been subject to any amendment since the Regulation 14 consultation. The policy identifies areas where proposals for renewable energy generation infrastructure will be supported as defined in Figure 17.
- 3.82. However, concerns remain regarding the identification of land immediately east of the emerging Scraftoft East allocation for such infrastructure. Whilst the Parish Council notes that the policy is intended to be supportive and that it is for developers to assess technical and environmental constraints, this position does not fully reflect the practical realities of development in this location.
- 3.83. In particular, the proximity of this land to a proposed large-scale residential allocation introduces highly sensitive receptors. In this context, renewable energy infrastructure such as solar arrays or wind turbines has the potential to

give rise to adverse amenity impacts, including glint and glare, noise, shadow flicker and visual effects. As such, the identification of this area as suitable in principle for such development risks creating incompatible land uses in close proximity.

3.84. Whilst it is accepted that detailed considerations would ultimately be assessed through the planning application process, the designation of this land within the policy provides an 'in-principle' level of support which is not considered appropriate given these constraints. On this basis, the inclusion of land to the east of Scraftoft East should be reconsidered.

3.85. Further concerns arise in relation to the supporting Figure 17, which appears to operate as a wider proposals or policy map rather than being limited to the identification of areas relevant to renewable energy infrastructure. This lack of clarity risks confusion as to the purpose and application of the Figure.

3.86. In addition, the Figure incorporates the extent of the Green Wedge as defined in the eLP, despite the SNPR seeking to apply a different designation through Policy ENV1. This creates inconsistency within the SNPR and undermines the clarity of the policy framework.

3.87. The inclusion of wider designations, including the identification of the Site as a residential allocation, further adds to this confusion, particularly given that the SNPR does not itself allocate sites for development. This increases the risk of misinterpretation in decision-making.

#### **POLICY IN1: INFRASTRUCTURE**

3.88. Policy IN1 has not been subject to any substantive amendment since the Regulation 14 consultation. Accordingly, the concerns previously raised on behalf of the respondents are maintained, albeit with some acknowledgement of the clarification provided by the Parish Council.

3.89. Notwithstanding this, Policy IN1 sets out that new development should be supported by the provision of new or improved infrastructure, together with financial contributions towards a range of identified off-site infrastructure requirements.

3.90. As drafted, there is no clear indication that the identified infrastructure requirements have been informed by

		<p>engagement with relevant infrastructure providers. In the absence of such engagement, there is a risk that the policy does not align with the strategic infrastructure planning undertaken at District level, particularly through the eLP.</p> <p>3.91. This is of particular relevance in the context of education provision. The eLP through Policy SA04 already establishes a clear strategy for Scraftoft East, including the provision of a new two-form entry primary school with early years provision as part of the allocation. In this context, the requirement within Policy IN1 for contributions towards alternative or additional provision at Fernvale Primary School is not justified by the available evidence and risks undermining the coordinated delivery of infrastructure envisaged through the strategic allocation.</p> <p>3.92. More generally, the policy does not make reference to the statutory tests governing the use of planning obligations. Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended) requires that planning obligations must be necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind.</p> <p>3.93. In the absence of reference to these tests, Policy IN1 risks being interpreted as requiring contributions towards all listed infrastructure items irrespective of whether they meet the statutory requirements. This would not be consistent with national policy or the legislative framework</p> <p>4. Site Benefits</p> <p>4.1. At present, given the district's acknowledged five-year housing land supply shortfall, more recent estimates of housing need and non-delivery of a strategic allocation at Scraftoft North within the Plan Period, there is an acute and immediate district-wide housing need which the Site will address.</p> <p>4.2. The scale of development is, in principle, appropriate to the sustainability credentials of the location, on the fringes of Leicester within Harborough District. The eLP and its evidence base, as well as the adopted Harborough Local Plan, are both clear that this is one of the most sustainable locations within the district.</p> <p>4.3. Scraftoft has also been identified as supporting a level of growth within the eLP which corresponds to the scale of development through the submission of an outline application for 950 dwellings (and associated infrastructure)</p>
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			<p>currently being determined by the LPA. The Site adjoins built form associated with the built-up area of Scraptoft and Bushby and is well-contained, both visually and functionally. Numerous facilities and services are also located within the maximum preferred walking distance of 2km.</p> <p>4.4. Davidsons and Jelson (the joint respondents) are Leicestershire-based housebuilders with an extensive local track record in the District of Harborough, the County of Leicestershire and throughout the midlands. Davidsons and Jelson have extensive expertise in the delivery of strategic sites for housing and have a commitment to the delivery of the Site. This can give confidence that homes will be built on the Site, which will make a substantial contribution to housing supply in Harborough in a timely manner.</p> <p>4.5. The proposed development incorporates land for a new 2FE primary school with early years provision. Whilst this is in part needed to mitigate the impact of the proposed development, it would also serve other planned growth at Scraptoft and Bushby and will enable the delivery of critical social infrastructure to allow the area to grow sustainably.</p> <p>4.6. The proposed development would also provide public open space in excess of that required and takes the form of attractive walking and circulation routes. These measures will encourage health and well-being and enhance the community's ability to meet its day-to-day needs.</p> <p>4.7. The construction process will provide a significant source of local employment and will also result in indirect and induced employment through the wider supply chain. New housing development also offers an opportunity to increase local expenditure as residents spend their money on goods and services in the local area. In addition, the housebuilding industry delivers economic benefits for local authorities through financial receipts generated in the form of New Homes Bonus payments and ongoing Council Tax revenue. This additional revenue represents an increasingly important source of income for local authorities as budgets continue to be squeezed.</p> <p>4.8. The proposed development would also deliver environmental enhancements through new tree and hedgerow planting, as well as the introduction of a large area of managed new habitat. The proposed development would also result in the construction of high quality and well-designed new homes, built to standards that reduce carbon emissions using non-fossil fuel heating, electric vehicle charging, high-quality fabric and other measures. For these</p>
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reasons, the proposed development would increase the stock of homes within the district that are high performing in energy efficiency terms.

## 5. Conclusion

5.1. These representations have been prepared on behalf of the respondents (Davidsons Development and Jelson Homes) in respect of the Regulation 16 consultation on the SNPR. They build upon the detailed submissions made at the Regulation 14 stage and respond to the updated submission version of the Plan, associated evidence base and Consultation Statement.

5.2. The respondents are promoting land at Scraftoft East, which is identified as a draft allocation within the eLP under policy SAO4. The Site represents a sustainable and deliverable extension to Scraftoft and will play a key role in meeting housing and infrastructure needs over the plan period to 2041.

5.3. At the Regulation 14 stage, the respondents raised a number of substantive concerns in relation to the drafting of policies, their alignment with national and emerging local policy, and the extent to which they were supported by proportionate and robust evidence. Whilst it is acknowledged that several amendments have been made through the Regulation 16 version of the SNPR many of the core concerns raised at Regulation 14 remain either unaddressed or only partially resolved.

5.4. This is due to several policies still adopting an overly restrictive or rigid approach, which is not consistent with the positive and enabling framework set out in national policy. This is evident in Policies HBE1, HBE5 and ENV10, where the wording risks constraining sustainable development rather than supporting it.

5.5. There are also instances of unnecessary duplication of higher-tier policy, particularly in relation to environmental matters. Policies ENV1, ENV4 and ENV5 replicate provisions already addressed through the eLP and national policy, contrary to the requirement for NDPs to serve a clear purpose and avoid duplication.

5.6. Concerns also arise in respect of the evidential basis and clarity underpinning some of the policies and designations, including wildlife corridors, locally significant environmental features and important views, where the justification provided is either unclear or not sufficiently robust. In addition, several policies introduce imprecise or broadly

			<p>framed requirements which may be difficult to apply consistently in decision-making, as seen in Policies ENV10 and IN1. Taken together, these issues risk creating uncertainty and, could result in misalignment with the strategic direction of growth established through the eLP, particularly in relation to infrastructure provision and land use compatibility, including the identification of land for renewable energy infrastructure adjacent to the Scraftoft East allocation.</p> <p>5.7. Notwithstanding the above, it is also recognised that there are positive elements within the SNPR. In particular, the acknowledgement of the Scraftoft East allocation and the alignment of the plan period with the eLP are supported, as these provide a clear and consistent spatial framework for growth.</p> <p>5.8. In light of the above, whilst the SNPR represents a positive step forward, further modifications are required so that it that it fully satisfies the basic conditions. This is to ensure that it has appropriate regard to national policy and supports sustainable development through clear and unambiguous policies. In addition to securing general conformity with the strategic policies of the development plan (including the eLP) and being underpinned by proportionate and up-to-date evidence which avoids unnecessary duplication. These representations are submitted constructively with the intention of assisting the Examiner in ensuring that the SNPR can proceed in a robust and effective form.</p> <p>5.9. In light of the above, whilst the SNPR represents a positive step forward, further modifications are required to ensure that it fully satisfies the basic conditions. To ensure it has appropriate regard to national policy, supports sustainable development through clear and unambiguous policies. This is in addition to being in general conformity with the strategic policies of the development plan (including the eLP) and being underpinned by proportionate and up-to-date evidence which avoids unnecessary duplication. These representations are submitted constructively with the intention of assisting the Examiner in ensuring that the SNPR can proceed in a robust and effective form.</p> <p>5.10. The respondents remain supportive of the principle of neighbourhood planning and the role of the SNPR in shaping development at a local level. However, it is essential that the SNPR is appropriately aligned with national policy and the emerging strategic framework to ensure that it facilitates, rather than constrains, the delivery of sustainable</p>
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			development, including the delivery of the Scraptoft East allocation.
3	<b>Turley on behalf of Parker Strategic Land</b>	<p>General</p> <p>Section 4A Supporting Text (Page 13)</p> <p>Policy HBE1 (settlement boundary)</p>	<p>Parker Strategic Land ('PSL') has fundamental concerns with the Scraptoft Neighbourhood Plan (NP) Review Examination Version, in particular the lack of substantive evidence to justify the approach taken, including a number of designations proposed by the plan.</p> <p>The National Planning Policy Framework (2024) is clear at paragraph 30 that:  "Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies."</p> <p>The above follows that neighbourhood plans must be in general conformity with the strategic policies of the development plan for the area. In this instance, the relevant development plan is the adopted Harborough Local Plan 2011–2031 (HLP).</p> <p>Whilst the emerging Harborough Local Plan has now been submitted for examination (17 April 2026), it is at an early stage in that process and its policies have yet to be tested, with representations still to be considered through the examination. The Plan is not expected to be adopted until December 2026 / January 2027 at the earliest (Harborough Local Development Scheme, November 2025).</p> <p>In accordance with paragraph 48 of the NPPF, only limited weight can be attributed to the emerging Local Plan at this stage, given that it has only recently been submitted, remains subject to unresolved representations, and has yet to be tested through the examination process.</p> <p>Accordingly, the adopted Harborough Local Plan remains the primary basis for assessing whether the Neighbourhood Plan is in general conformity with the strategic policies of the development plan, as required by Basic Condition (e).</p> <p>The NP Review states that the Scraptoft North SDA (Policy SC1) "...was not developed for financial viability reasons". This assertion is incorrect and is not supported by any evidence within the Plan.</p> <p>Scraptoft North remains deliverable and is now intended to come forward on a phased basis. An application for Phase 1, comprising up to 190 dwellings, was submitted on 31 March 2026 and is currently awaiting validation.</p> <p>The site continues to form part of a strategic allocation within the adopted development plan and there is no substantive evidence to justify the position set out in the NP Review. Accordingly, the above statement should be deleted.</p> <p>The adopted HLP allocates land at Scraptoft North for development (Policy SC1), including approximately 1,200 dwellings. However, the settlement boundary identified at Figure 3 of the NP Review (which replicates that shown in the made NP) does not include Scraptoft North, either within the defined settlement boundary or as a proposed allocation.</p> <p>Paragraph 30 of the NPPF is clear that neighbourhood plans "...should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies". By excluding Scraptoft North from the settlement boundary and failing to recognise it as a strategic allocation, the NP Review is effectively seeking to promote less development than that provided for in the HLP.</p>

		<p>Policy ENV1 (areas of separation)</p>	<p>Therefore, the NP Review is not currently in general conformity with the strategic policies of the development plan, contrary to the requirements of Basic Condition (e). To achieve conformity, the NP Review should identify Scraftoft North as a strategic allocation for development and include it within the defined settlement boundary.</p> <p>The designation proposed by this policy would, in part (including at Scraftoft North), essentially overlay land already designated as 'Green Wedge' in the adopted HLP. In designating this land as Green Wedge, the HLP is clear at paragraph 4.11.3 (p.38) that much of the area of separation identified in the made Scraftoft NP is 'effectively superseded' by HLP Policy GD7 (Green Wedge).</p> <p>The NP Review states that the proposed Area of Separation will 'supersede' and/or 'replace' the existing Green Wedge and Area of Separation designation in the development plan. However, there is no evidence (for example, a proportionate Area of Separation assessment) or robust justification in the NP Review itself to support the proposed replacement of the green wedge policy in the HLP, particularly in relation to Scraftoft North.</p> <p>Paragraph 30 and footnote 17 of the NPPF (and Basic Condition (e)) are clear that neighbourhood plans should be in general conformity with strategic policies of the development plan and should not seek to undermine or replace those policies.</p> <p>Accordingly, in order to meet Basic Condition (e), the proposed Area of Separation designation should be deleted insofar as it relates to Scraftoft North.</p>
		<p>Policy ENV2 (local green spaces)</p>	<p>The southern extent of Scraftoft North is proposed to be designated as 'Local Green Space' under Policy ENV2 of the NP Review (it is currently identified as Green Wedge only in the made NP).</p> <p>Firstly, there is a clear lack of proportionate and robust evidence provided to support the proposed designation. The only relevant supporting document is Appendix 3 of the NP Review: Local Green Space and Open Space, Sport and Recreation Report (undated). This report does not set out any clear methodology, and the supporting commentary is limited and not clearly underpinned by technical evidence. The scoring applied is inconsistent and, in some cases, based on incorrect assumptions. For example, the site is scored five out of five for recreational value based on "walking and dog walking"; however, the land is not publicly accessible and is not crossed by any public right of way. By contrast, other publicly accessible sites (such as James Way / Church Hill Green, ref: 006) are scored lower.</p> <p>Notably, in response to representations made at Regulation 14 stage (December 2025), the Parish Council acknowledged this inconsistency in its Consultation Statement (February 2026) and indicated that the scoring for public access would be amended. However, no such update appears to have been made to Appendix 3. Furthermore, certain assessment criteria, such as the 'history' category, are not relevant planning policy considerations, and the biodiversity scoring does not appear to be supported by any technical ecological evidence.</p> <p>Secondly, and most importantly, the proposed designation (insofar as it relates to Scraftoft North) is not in general conformity with the development plan. The land forms part of a strategic allocation for development under Policy SC1 of the adopted HLP and is not identified as open space within that allocation.</p> <p>Accordingly, to meet Basic Condition (e), the proposed Local Green Space designation should be deleted insofar as it relates to Scraftoft North.</p>
		<p>Policy ENV3 (open space,</p>	<p>PSL's land at Covert Lane (Site 008) is proposed to be designated as an Open Space, Sport and Recreation site.</p>

		<p>sport and recreation sites)</p>	<p>However, as set out in Appendix 3 of the NP Review: Local Green Space and Open Space Sport and Recreation report (undated), the site has not been used for sport and recreation since 2016, at which point the site had become unusable, with the playing surfaces very poor.</p> <p>Furthermore, as demonstrated by the pending outline planning application (Harborough ref: 23/01690/OUT), the site has never been available for community use. Following the relocation of Stoneygate RFC in 2013, the facility was used exclusively by Leicester Tigers for limited training purposes. All built facilities on the site have since been demolished, having fallen into dereliction following a fire.</p> <p>Stoneygate RFC has since relocated to the Community College at Uppingham, and Leicester Tigers' training activities are now accommodated at Brooksby Melton College. The disposal of the Covert Lane site to PSL partly funded the redevelopment of the training facilities at Brooksby Melton College.</p> <p>Further supporting evidence regarding the above is provided in detailed letters from Leicester Tigers and Howes Percival, both of which accompany outline planning application 23/01690/OUT. These letters are submitted alongside these representations (labelled appendices 3 and 4).</p> <p>In light of the above, the site has not been used for sport or recreation for circa ten years and has never been available for community use. There is therefore no substantive evidence to justify its designation as an Open Space, Sport and Recreation site through the NP Review.</p> <p>Accordingly, to ensure that Basic Condition (a) is met, the site should be deleted as an Open Space, Sport and Recreation site.</p>
		<p>Policy ENV4 (sites of natural environment significance)</p>	<p>Under Policy ENV4, the NP Review proposes to continue identifying the southern extent of Scraftoft North as a Site of Natural Environment Significance. This reflects the land's current designation as a Local Nature Reserve, which is intended to be de-designated upon planning permission being granted for the relevant phase of Scraftoft North.</p> <p>There are no significant comments on this policy. It broadly reflects national policy insofar as it allows for development affecting the site where the benefits are considered to outweigh the site's biodiversity significance, including the delivery of at least 10% Biodiversity Net Gain.</p> <p>Indeed, it is anticipated that any future development proposals would incorporate this land within areas of public open space.</p>
		<p>Policy ENV5 (biodiversity and habitat connectivity across the neighbourhood area)</p>	<p>Paragraph 187 of the National Planning Policy Framework is clear that planning policies should protect valued landscapes and sites of biodiversity or geological value. The adopted HLP does not identify land at either Scraftoft North or Covert Lane as designated for biodiversity value. In these circumstances, national policy instead requires policies and decision-makers to 'recognise' the intrinsic character and beauty of the countryside.</p> <p>Accordingly, the requirement within draft Policy ENV5 to 'protect and enhance' the wildlife corridors identified at Figure 9.1 goes beyond the requirements of national policy and is also inconsistent with the adopted development plan, specifically HLP Policy G15 (Biodiversity and Geodiversity). As such, the approach does not satisfy Basic Conditions (a) and (e).</p>
			<p>Furthermore, the proposed approach gives rise to a clear conflict between draft Policies ENV5 and ENV4, with Policy ENV4 allowing for a planning balance to be undertaken between harms and benefits, including scope for mitigation.</p> <p>In any event, no proportionate technical evidence has been provided to identify or justify the wildlife corridors shown on Figure 9.1.</p>

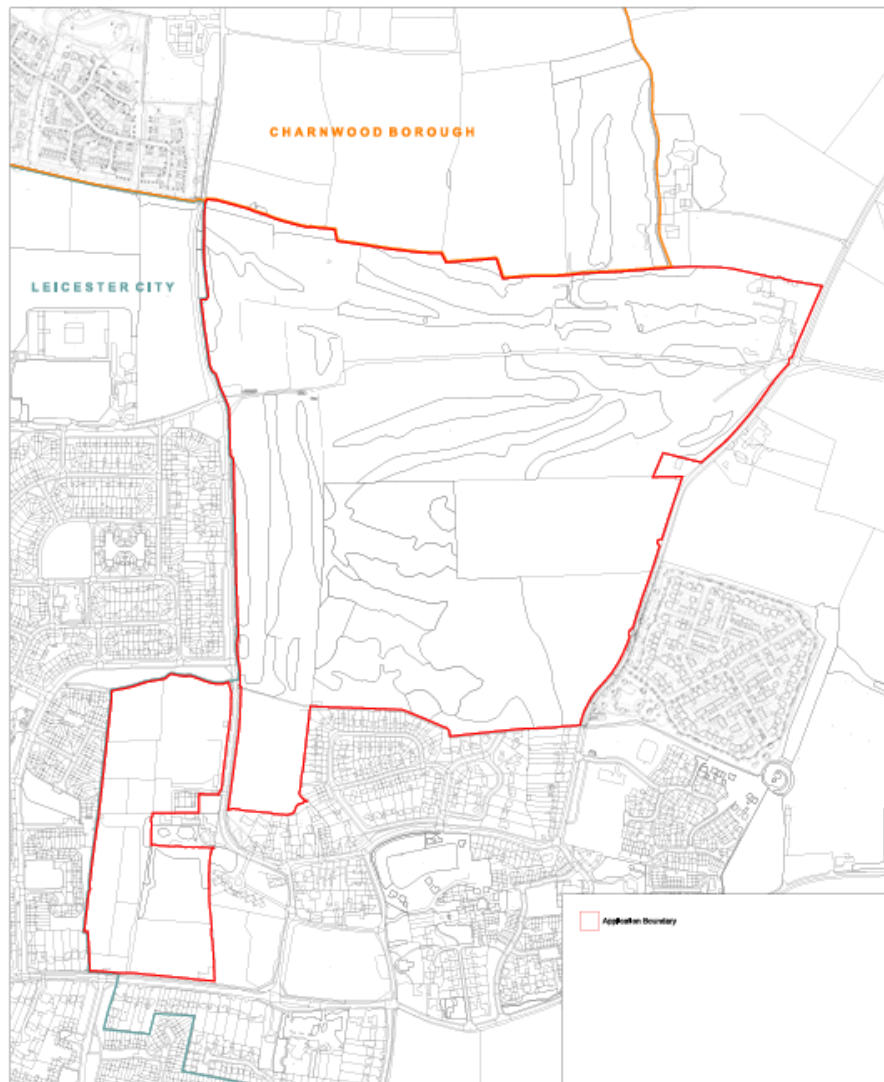
		<p>Policy ENV8 (ridge and furrow)</p>	<p>Accordingly, in order to meet Basic Conditions (a) and (e), the fourth paragraph of draft Policy ENV5 and Figure 9.1 should be deleted, together with all supporting text relating to the identified wildlife corridors.</p> <p>As currently worded, this policy is not in general accordance with national planning policy.</p> <p>Ridge and furrow is already addressed by the NPPF as a non-designated heritage asset (paragraph 216). That paragraph requires a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset. The NPPF does not require any separate consideration of 'local benefits', which is introduced through</p> <p>Policy ENV8. Policy ENV8 therefore goes beyond the requirements of the NPPF and is inconsistent with national policy. Accordingly, in order for the NP Review to meet Basic Condition (a), this policy should be deleted. References to the policy should also therefore be removed from Policy ENV11.</p>
		<p>Policy ENV9 (important views)</p>	<p>Figures 14 and 17 of the NP Review identify Important View No. 5 as extending eastwards beyond Mount Woodland, including across PSL's Covert Lane site. Policy ENV9 similarly describes this viewpoint as a view "through and from Mount Woodland, and eastwards across the open spaces beyond".</p> <p>However, Appendix 4 of the NP Review: Important Views in Scraptoft document (undated), includes an image of Viewpoint 5 (View from Dandelion Lane towards Mount Woodland), which does not show any view eastwards beyond Mount Woodland.</p> <p>There is therefore a clear inconsistency between the mapped figures, the policy wording and the supporting evidence. As currently drafted, the viewpoint is unclear and ambiguous.</p> <p>Accordingly, in order to ensure that the NP Review is clear to the decision-maker and capable of meeting Basic Condition (a), having regard to paragraph 16 of the National Planning Policy Framework, Figures 14 and 17 should be amended so that the directional arrow identifies this view as being towards Mount Woodland only. Alternatively, the viewpoint should be deleted in its entirety.</p>
		<p>Policy T1 (sustainable transport)</p>	<p>Whilst there is no objection to this policy, it largely duplicates the requirements of existing HLP policies such as Policy IN2, together with the already established Leicestershire County Council parking standards. We do not therefore consider it necessary to repeat adopted policies or established standards within the NP Review.</p>
		<p>Policy IN1 (infrastructure)</p>	<p>Policy IN1 effectively reads as an Infrastructure Delivery Plan ('IDP') specific to Scraptoft. However, no evidence has been provided to support the infrastructure requirements identified.</p> <p>For example, the provision of additional school places at Fernvale Primary School is a matter for Leicestershire County Council in its capacity as local education authority, and would in any event be considered through the determination of planning applications for new development within the parish, irrespective of whether Policy IN1 is included in any made NP Review.</p> <p>Similarly, the provision of medical facilities is a matter for the relevant Integrated Care Board and would be considered through the determination of planning applications for new development within the parish.</p> <p>Whilst the Parish Council may have an aspiration for a new pharmacy within the village, there is no planning policy basis requiring such a use to be delivered as part of future development.</p> <p>In the absence of the necessary evidence, any requirement for developer contributions towards these matters would be unlikely to satisfy the tests for CIL compliance</p>

Accordingly, in order to ensure that the NP Review is capable of meeting Basic Condition (a), parts (a) and (d) of Policy IN1 should be deleted. It should also be made clear that facilities such as a pharmacy and recreation provision for older children are aspirations rather than policy requirements.

Design Code (Appendix 2 of the NP Review)

Section 4.1 of the Design Code indicates that the guidance and code are not intended to be applied to the 'Strategic Development Area'. It is presumed that this refers to Scraptoft North; however, for the avoidance of doubt, the Design Code should include a plan clearly identifying the land to which this exclusion applies. PSL's full response, prepared by Stantec, to the Design Code is enclosed alongside these representations (labelled Appendix 5).

Appendix 1 – Scraptoft North Location Plan



Parker Strategic Land Ltd		Landscape Architect 11-15557 14-15555-15556			
Scraptoft North		11-15557	11-15555	11-15556	11-15558
Application Boundary		11-15557	11-15555	11-15556	11-15558

Appendix  
2 –  
Covert  
Lane  
location  
plan





16 July 2024

Mr Mark Patterson  
Strategic Growth Manager (Development Management)  
Harborough District Council  
The Symington Building  
Adam & Eve Street  
Market Harborough  
Leicestershire LE16 7AG

RECEIVED

19 JUL 2024

CORPORATE SERVICES  
Harborough District Council

**Re: Application 23/01690/OUT - Proposed Erection of 100 Dwellings on Land at Covert Lane, Scraftoft**

I am the Chief Executive Officer at Leicester Football Club Plc (Leicester Tigers). I have been requested to confirm in writing the circumstances that led to Leicester Tigers vacating the premises that it occupied under a lease at the former Stonegate Rugby Football Club (Stonegate) ground off Covert Lane, Scraftoft and its subsequent relocation of pitches to Brooksby Melton College.

The background to this matter is that Stonegate, who owned the freehold of the site, had vacated the premises that they owned at Covert Lane, Scraftoft in or around 2013. Whilst Stonegate can provide their reasons for leaving the site, we understood that they could no longer sustain sufficient interest in the Club at that location. They were located immediately adjacent to another and more successful club known as Aylestone St. James, and Stonegate relocated to the Community College at Uppingham.

Leicester Tigers utilised the Covert Lane ground for informal training in the period 2014 to 2016 and then took a lease of the site on 28 April 2017 for a period of 25 years.

The site had very limited use for training purposes in connection with the Tigers Junior Academy. The playing surfaces were very poor and the buildings on site were unusable. This culminated in the almost immediate cessation of use of the site in April 2018, just a year after the lease was entered into.

We became aware through the freehold owners that they wished to sell the site to a third party, Parker Strategic Land Limited (Parkers), who had expressed an interest in potentially redeveloping the site and for Stonegate to use the sale proceeds to facilitate the Club's ambitions for establishing its presence in Uppingham. Given that Leicester Tigers also felt that these facilities were of no use to us, and that we had our own ambitions to enhance our training facilities at Brooksby Melton College, we agreed to enter into discussions with Parkers about vacating the site. Leicester Tigers have a longstanding connection with Brooksby Melton College and have looked not only to utilise the facilities at the College for the Club's training, but also to encourage play by students at the College and the wider community.

 @leicesterligers

MARK PATTISON | Strategic Growth Manager | Aylestone Road | Leicester | LE16 7AG  
T: 01533 433321 | E: mark.pattison@hdc.gov.uk





An agreement was therefore entered into in March 2019 between Leicester Tigers, Parkers and Stonegate whereby it was agreed that Parkers would buy the Covert Lane site from Stonegate and we would in turn surrender our lease. Stonegate would then re-invest the proceeds of sale into playing rugby at Uppingham and Leicester Tigers would be paid for the surrender of its lease to fund the new training pitches that it proposed to establish at Brooksby Melton College. The contractual arrangement required Leicester Tigers to submit a planning application for 3 new pitches, and, once permission had been granted and the pitches had been created and brought into use, the surrender value would be paid to Leicester Tigers.

A planning application was duly submitted to Melton Borough Council and was granted permission on 25 October 2019. The pitches were constructed and Parkers paid Leicester Tigers the surrender value to cover the costs associated with the provision of the three pitches in accordance with the terms of the contract and the agreement to surrender our lease.

The planning permission for the 3 new pitches clearly benefitted Leicester Tigers insofar as it now had full access to 3 pitches for training purposes, as well as enhancing its ongoing future commitment to developing sporting connections with Brooksby Melton College and its students. The pitches were also available for use by students at the College and indeed we have always encouraged wider community use, which is beneficial in the context of the College and its grounds as well as just the use of the pitches. All of these benefits were set out clearly in a letter from Scott Clarke to Melton Borough Council dated 6 June 2019 (attached).

Update May 2024:

Completion of the pitch redevelopment happened through the first stages of the Covid outbreak and although the College did have some minimal activities in the first few terms it wasn't until early 2022 when the benefit to College and Community began in earnest.

Prior to inception, the College had approximately 90 FE and HE male students involved in regular rugby activity. On Completion we were able to bring in our first intake of Female FE students in Sept 2022, with 12 girls joining the College for our first ever female rugby offer and an increased intake of boys taking us up to 100 FE 16 – 18 boys as well. Leicester Tigers also launched their first season running a Women's team and thanks to the new pitches and training space were able to utilise Brooksby as the training venue for the Leicester Tigers Women's team involving regular, twice weekly, sessions housing 40 women at the College throughout the 2022/23 season.

Tigers Community team took advantage of the increased space and welcomed over 1500 young players (boys and girls) from around the region in match day festival weekends, hosting our first festivals after Covid in the wide-open spaces provided by the new pitches. There was also closer involvement with Melton Mowbray Rugby working together to provide pitch space during inclement weather – a feature that is becoming more of the norm than exceptional circumstance.

2023/2024 has delivered further growth in both boys and girls FE participation with over 120 boys and 30 girls aged 16 – 18 now able to train and participate in 6 – 10 hours of meaningful rugby, representing the College in AoC and ACE leagues whilst studying at the College, with many going on to represent the County and, in some cases, national teams.

 @leicesterligers

100% of the proceeds from the sale of the Covert Lane site will be used to fund the development of the new training pitches at Brooksby Melton College.






Increased Community participation to include college enrichment days, local and regional primary and secondary schools' festivals, match day coaching and national festivals have seen over 4000 young people enjoy the benefit of the new facilities during this period.

Leicester Tigers continue to work on growing the offer with SMB College Brooksby to widen participation and sport opportunities in general. The additional quality, maintained and managed, new pitch space supported by the stand alone changing room space has afforded further outreach and scope to develop the offer for sport in the locality and beyond. Plans for summer activities and an increased intake of girls and boys next season will see approximately 40 girls participating on a weekly basis along with over 120 boys. The College continue to utilise the space, when not in use for Rugby, for wider enrichment activities for the student mass.

Yours faithfully,



Andrea Pinchen  
Chief Executive Officer

 @leicesterigers

100% FAN OWNED  
100% COMMUNITY SUPPORTED  
100% COMMITMENT TO THE CLUB



Scott Clarke  
Head of Community and Global Partnerships  
Leicester Football Club PLC / Leicester Tigers  
Aylestone Road  
Leicester  
LE2 7TR

Date 6/6/2019

Ref Application: 20190603 52319 Brooksby Melton College Ref 19/00446/COU

Change of use of Agricultural Land into 3 Rugby Pitches to increase facility for sports provision at the college.

Following on from the recent response from Sport England and the RFU regards our ongoing application we wanted to answer as many questions raised as possible to allow for the successful process of the above application. In responding we will look to answer as clearly and openly as possible where questions have been raised but request should further clarification be needed any party can feel free to contact us directly. We have spoken to both Sport England and the RFU with regard to this application.

Sport England raised the question of the existing zone marked out as a football pitch, their assumptions are correct and that the experimental work done was to consider the suitability for this transition and provide a basic area for students to play kick about games during break and down time. This is not an area presently used by Mansfield Town for any formal football activity and is still designated agricultural land.

The proposal looks to support and work with Sport England on the development of suitable quality playing space for all the reasons highlighted in their assessment. We note the statement regards the potential sale of Stonegate Rugby Club and would look to clarify the relationship with that possible outcome. Stonegate Rugby Club was last used by Tigers Junior Academy in April 2018 and has since been unoccupied. The facility being deemed unsuitable for our requirement for numerous reasons not least location, quality of venue and state of repair of the playing surfaces and building facilities which can only be described as derelict and in need of substantial investment presently unavailable to Tigers. As part of ongoing discussions with Parkers who were interested in the Stonegate site in 2017 we discussed with BMC the possibility of creating 3 new pitches to provide suitable training space for our operations and identified the space within the application as a possible resource, this is a mutually beneficial solution as it would also enable our continued development of the community and academy operations building closer ties with our BMC Partnership and afford the wider use of such a facility through Tigers Community delivery. As such this application may meet some possible future mitigation criteria for Parkers should they take possession of Stonegate and decide to apply for its change of use, and Parkers are supporting us in this application, we are however, lead to believe that any such

application at Stoneygate, should it occur, would be several years in the future and will be a matter for Parkers to pursue. Resources released to Tigers from any sale of Stoneygate would in some part be utilised to help us develop the long term plans of development at BMC but in this instance the present proposal for change of use on agricultural space stands up on its own to service the present and growing demands of running a weekly college rugby programme featuring over 90 FE and HE students, numbers we are expecting from September 2019. We have worked with Sport England and the RFU on these outcomes and will continue to do so.

In referring to the RFU we have been discussing with Peter Shaw and Jenna Studley the wider opportunities for development at BMC to support educational outcomes and increase sporting opportunity and local economic benefit. This first step application answers the immediate need will allow the College to meet its needs for training space. We are still looking to work with the RFU on a whole college site plan for sport and hope they may be willing and able to bring resources and funding to the table to enable that development.

We refer the RFU to the notes above regards Parkers Involvement and point to note that any sale of Stoneygate to Parkers will benefit the development of useable Rugby facility across the county for Tigers and Stoneygate RFC, whereas present and future use of the facility at Stoneygate Covert Lane is and will be non-existent.

We will look to utilise Tigers Professional Ground staff in and advisory capacity and Sports Turf professionals to create the best surfaces possible for the proposed new pitches and we gladly seek support and advice from the RFU and SE.

At this stage we have no plans for Floodlights as the pitch space created will have more than average use throughout the day light hours.

In the application we refer to wider community use – to Clarify – Leicester Tigers has one of the biggest community teams within the professional game with 18 full time professional coaches and educators based at Welford Road working in the local schools, rugby clubs and community groups. Each year we run a multitude of educational, health, sport and behavioural programmes that look to engage the community from 2 to 82 in positive, activity driven engagements. Having space at BMC suitable for festivals and events will allow us to visit more schools and clubs and support the community as opportunities arise. We will be working closely with the local rugby clubs and schools as well as on a regional basis to maximise the benefit of having 3 usable community pitches. We will gladly work with the RFU and LRU to support local Rugby and MMBC to support the local sport plan. This open attitude to other groups and indeed other sports is something we share with BMC who are also keen to support the local community and MMBC in any activity it can as an important business and education provider within the Borough.

The RFU raise the question on Mansfield Town's use of the facility at BMC. Mansfield Town have reduced their numbers at BMC and for the past year used the 3G football pitch and indoor facilities for their training and playing requirements. Working closely with the Tigers Rugby Coaches on site we have managed the facility as best possible to keep both sport offers functioning to the best standard possible. Mansfield Town's numbers will in the future drop as Rugby grows and they develop their own academy base nearer their home in Mansfield. Tigers, BMC and Mansfield will continue to work together to ensure the facility has the capability to meet all the student's needs. A new modular set of 2 self-

contained rugby changing rooms has been resourced and commissioned (April 2019) at the College with a specific design to cater for Rugby as per the photo below and this has enabled the further increase in numbers on enrolment. The Changing rooms are situated by the side of the 3G pitch overlooking the proposed new pitch space.



#### Playing Field Design

Whilst the college itself is an agricultural college with numerous professionals BMC and Tigers will utilise professional services to assess ground conditions and the needs to improve / create a quality surface and commission work as budgets afford.

Tigers & BMC as part of the ongoing improvements have commissioned the professional services of Premier Turfing to undertake improvement works on the existing Rugby Pitch / Training space to level and provide a higher quality playing surface suitable for AASE and Academy fixtures. This pitch will be protected from regular use / training space by the addition of the three new pitches. Tigers also have one of the best Rugby Groundsmen in the Country in Ed Mowe, he will be utilised to advise and recommend actions needed to develop the land highlighted. BMC are preparing to add new bespoke resources to focus of caring for an increased sport surface provision.

In requesting this application to pass planning process we finally note that within the change of use from agricultural to sport we are not looking to create an international quality set of floodlit pitches for the elite game and that all work done will look to benefit from the advice and support of the RFU but will be conducted in the understanding of limited resources creating facility fit for use. The definitions provided by the RFU on Community use refer to benefits for local clubs which have already been enjoyed with a healthy local reciprocal arrangement with the College and Tigers and these will continue to grow.

The long term vision to develop the sport and sport facility at Brooksby would greatly welcome the input from the RFU and Sport England both in an advisory capacity and with funding should they wish to support and we will keep talking with them as this and any future development occurs. BMC and Tigers will also continue to work with MMBC to develop the facility and its many benefits to the community of Melton both as a working College but also as a major local employer and business bringing economic benefit to the region.

Please feel free to contact myself at Tigers should any further clarification be needed to support this application.

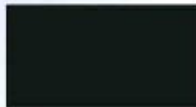
Best regards

Scott

Scott Clarke

Head of Community and Global Partnership

Leicester Tigers



Appendix  
4 –  
Howes  
Percival  
letter



3 The Osiers Business Centre  
Leicester, LE19 1DX  
DX 710913 Leicester Meridian  
www.howespercival.com  
Telephone 01162 473500

Mr M Patterson  
Planning Department  
Harborough District Council  
Symington Building  
Adam & Eve Street  
Market Harborough  
Leicestershire  
LE16 7AG

Sent by email only to: [REDACTED]

Our Ref: PDH/240150.0007  
Date: 2 September 2024

Dear Mark,

**Planning Application Reference Number 23/0169/OUT-Parker Strategic Land Limited – Land at Covert Lane, Scraftoft.**

I refer to the above matter and to earlier emails and correspondence relating to the Sport England objection to the above planning application. You will be aware of the content of the Sport England objection lodged by Sharron Wilkinson on 20 December 2023, a copy of the letter in reply from Louise Ingram at Shakespeare Martineau dated 30 January 2024 and the further response from Sharron Wilkinson dated 28 February 2024. I have also been supplied with a third letter sent by Sport England dated 12<sup>th</sup> August 2024. I have also received the letter that Leicester Tigers sent on 6<sup>th</sup> June 2019 (we presume to Melton Borough Council) which Sharron Wilkinson referred to in her initial objection. Finally, I have had sight of a letter dated 16 July 2024 from Andrea Pinchen the Chief executive of Leicester Tigers addressed to yourself regarding this matter and a letter from the President of Stoneygate Rugby Football Club dated 6<sup>th</sup> August 2024 which you may not have seen, so I attach a copy for your information.

By way of background, I was heavily involved in this project on behalf of Parker Strategic Land (Parkers) at the time they were looking to acquire this site (2017/18). I attended numerous meetings with representatives of the landowners, Stoneygate Rugby Football Club and Leicester Tigers Rugby Football

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Club. I also attended a lengthy site meeting with various people including Mr Steve Beard of Sport England, at which meeting the proposals for the redevelopment of the Stoneygate Rugby Football Club were fully explained to Mr Beard together with the proposals for relocating the pitches to the Leicester Tigers training facility at Brooksby College and the relocation of the built facilities by Stoneygate Rugby Football Club to their preferred location in Uppingham. Steve Beard viewed the pitches and went inside the then semi- derelict buildings in the company of Leicester Tigers representatives who explained that the facilities were of little or no use to them.

Following my departure from Shakespeare Martineau at the end of 2018, I was not involved further in terms of the contractual arrangements, but it is clear that a contract was entered into between Parker Strategic Land Limited, Stoneygate Rugby Football Club and Leicester Tigers on the 27<sup>th</sup> March 2019. The consequence of that contractual arrangement was quite clearly that Leicester Tigers would, with funding from Parkers, relocate their pitches to Brooksby College near Melton Mowbray given that they no longer had any need for the pitches at Covert Lane, Scraftoft and had already established facilities at Brooksby college which they were seeking to develop further. Furthermore, it was clear that the buildings themselves were in an extreme state of dereliction and were not being used given vandalism and an extensive fire at the premises. The funding from the sale of the property by Stoneygate Rugby Football Club was then to be utilised for the erection of built facilities at Uppingham. Therefore, the intention was quite clearly and at all times, not only the relocation of the pitches, but also the provision of alternative built facilities that would benefit the Stoneygate club. It should be stressed that Stoneygate Rugby Football club did not have use of either the built facilities or the playing pitches at Covert Land as the premises had been leased to Leicester Tigers for a period of 25 years in 2018 and the Tigers had been in occupation of the site since 2014 following Stoneygate leaving the site in 2013 to move to Uppingham.

As you may be aware, the built facilities on the site have now been demolished given their condition which seems not to have been appreciated by Sharron Wilkinson in her initial comments. It is also clearly not understood by Sport England that the pitches were rarely being used and indeed the built facilities were not capable of use. It is also the case, contrary to what is asserted in Sharron Wilkinson's correspondence that this was not a community club and there was no community access to it. The facility was exclusively used (or more to the point not used) by Leicester Tigers for limited training purposes. The new pitches created at Brooksby however (again contrary to what Sharron Wilkinson asserts) do have a wider community benefit as is made clear by Leicester Tigers themselves (see letter of the 6<sup>th</sup> June and reiterated again by Andrea Pinchen) and are far more accessible to a wider variety of people than the pitches were at Stoneygate.

Since this investment was made in the facilities at Brooksby there has clearly been a huge growth in community based rugby including at junior level, to include girls teams, associated with the Tigers and their facilities. The link to the college has expanded opportunities for students and the wider community as well as the club. There was never anything like this at Stoneygate. This is all in line with the government 2023 Strategy Get Active: A strategy for the future of sport and physical activity as well as Sport England Strategy priorities (Uniting the Movement 2021).

It should also be stressed that whilst there was never any community use of the rugby football club at the premises in question, the adjacent rugby football club, Aylestone St James, was and remains an active community based club. Even this club however has struggled over the years with reliance being placed

Confidential

on players being drawn from Leicester and students attending De Montfort University to maintain the number of players to keep the club going. Having two clubs immediately adjoining when the level of interest in the sport means it is difficult to sustain one club, shows clearly the lack of any need to retain the Stoneygate site for rugby in this location. The real need was elsewhere both for Tigers and Stoneygate and that need was met and funded by Parkers.

The planning application that was submitted to Melton Borough Council for the establishment of three new rugby pitches was intended from the outset to be replacement pitches for Stoneygate. That will be evident from the contract with Leicester Tigers referred to above which we are willing to make available.

Sharon Wilkinson refers to representations being made by Steve Beard to Melton Borough Council regarding the status of the application at Brooksby College and whether this was intended to be a replacement, which he fully understood at the time was intended as a replacement and was no doubt the reason that he raised the issue in the first place. Indeed, why would Sport England object to a planning application to create three new rugby pitches at Brooksby college? The objection had no purpose it seems to us but to try and establish a point that was known, from discussions, was simply not the case or a reflection of the true facts, namely that the proposals at Brooksby were directly linked to the Stoneygate site and that the new pitches were intended to be replacements. We are told that as a result of the letter of the 6<sup>th</sup> June, Sport England was able to remove their objection.

At no stage was my client aware that Steve Beard had lodged a holding objection or that Scott Clarke may have made a statement on behalf of Leicester Tigers which directly contradicted the terms of the agreement including the contract entered into with Leicester Tigers for the surrender of their lease on the Stoneygate Rugby Club premises. That these pitches were replacements is obvious from

- i) The fact that there was a contract between Parkers and Leicester Tigers and Stoneygate rugby club to purchase the site with vacant possession.
- ii) Leicester Tigers were to surrender their lease on payment by Parkers of all sums needed to obtain planning permission for the Brooksby pitches and to construct them.
- iii) Leicester Tigers would only be paid the monies in (ii) once they had constructed the replacement pitches and they were to be brought into use.
- iv) The above having been confirmed in correspondence by Leicester Tigers
- v) Stoneygate were to use the proceeds of sale to fund their activities as a club then operating at Uppingham and who are still seeking to build a new club house with those funds.

It would therefore appear that Steve Beard, knowing full well of the linkage and therefore inviting Leicester Tigers to confirm that there was no such linkage, Sport England now seek to use that argument against my clients on the basis that the provision of those pitches are not to be treated as replacements for the loss of the Stoneygate Rugby Club pitches. The assertion is simply not true and we can clearly demonstrate that it is not true.

Furthermore, we have considered carefully (as we are sure you will have) the contents of the letter of the 6<sup>th</sup> June 2019 and we do not accept that Scott Clarke states these are not replacement pitches. Scott

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Clarke obviously found himself in a very difficult situation. On the one hand he is presumably aware that Sport England will continue to object to the application until given the assurance that the pitches are not replacements and on the other hand he is aware that he needs to avoid saying anything that he knows not to be true. The language used therefore is cautious and at times rather vague.

The following points should be considered. In paragraph four the link to Stoneygate and its sale is noted. Stoneygate was last used by Leicester Tigers in April 2018 and had been unoccupied ever since. The proposals for creating the pitches at Brooksby (BMC) is expressly linked to the purchase of the Stoneygate site by Parkers. The community benefits for the BMC proposal are also emphasised. The letter states "As such this application may meet some possible future mitigation criteria for Parkers should they take possession of Stoneygate and decide to apply for its change of use and Parkers are supporting us in this application..." This is something of an understatement and it clearly shows the linkage between the proposals and it is a nonsense to suggest the provision of three new pitches at BMC were not meant to be replacements for the pitches at Stoneygate. They might have been "additional" pitches to the ones already at BMC but they would never have been provided without the sale of the Stoneygate site for development purposes.

Paragraph four continues by referencing the resources being released to Tigers from any sale of Stoneygate being in part used to develop the club's long-term plans for development at BMC. As stated, the monies paid covered (as far as we are aware) all the costs of the provision of the pitches and the planning process connected therewith.

Paragraph six is even more emphatic when referencing the deal with Parkers and the benefit of the money Tigers would receive to develop useable rugby facilities across the county. It concludes that "...present and future use of the facility at Stoneygate Covert Lane is and will be non-existent" How is it possible that the pitches at BMC are additional facilities if the facilities they had were "non-existent". Further, how is it that the Tigers lease was surrendered to enable the Stoneygate sale to proceed as soon as the new pitches had been provided and they received payment for the provision of those pitches?

In short, it is beyond question that the pitches at Stoneygate were under the exclusive control of Leicester Tigers and were not a community facility. Further that those pitches were unplayable and the buildings on site unusable. Leicester Tigers entered into a contract with Parkers whereby they would seek planning permission for three new pitches at BMC and as soon as planning permission had been granted, the pitches constructed and brought into use, they would surrender their lease and be paid the cost of providing the new pitches. This duly took place. Those new pitches have far greater community use and indeed are usable unlike the Stoneygate pitches.

Stoneygate rugby club entered into the lease with Leicester Tigers because they no longer had need of the site. Their players were drawn mostly from Rutland and they decided many years ago to relocate to Uppingham Community College. The proceeds of sale of the Stoneygate site have been set aside to fund a new sports pavilion for the club as soon as they can obtain planning permission. Details of their proposals have been provided in the letter from the club attached. It is clear that the proceeds of sale from the Stoneygate site have been ringfenced to be used in the investment in built facilities for the club once they have secured a suitable site. They have been trying to secure long terms arrangements to occupy the facilities at the community college and build there. They have also been trying to acquire land in or around Uppingham. Despite their efforts to date a site has not been secured but that search is ongoing and the investment of their funds for the benefit of the club is beyond question.

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4161-2216-2512, v. 6

It is manifestly clear that the purchase of the Stonegate site was on the basis that better alternative facilities would be provided in replacement of what was lost. The pitches were unplayable and three new pitches have been created at BMC in their place which has greatly benefited the Tigers, students at the college and the wider community. The sport of rugby is clearly the beneficiary and massively so compared to the Stonegate site. The built facilities do not exist and were unusable long before Parkers acquired the site. In any event the future of the club is in Uppingham and the club are clearly intent on seeking to make Uppingham their long term base where the proceeds of sale from the Stonegate site will be invested. Both Leicester Tigers and Stonegate Rugby Club have come out of the purchase of the site very favourably and the consequence of the acquisition is the expansion, enhancement and future security of rugby at both a professional and amateur level within Leicestershire which arose solely from the development value of the site and its purchase by Parkers. The winners are the not only two clubs but the sport of rugby as a whole, as a site that was no longer required for rugby and no longer suited to sporting use due to its decline and neglect produced significant benefits to both clubs and to the sport due solely to its development value.

Yours sincerely

A solid black rectangular box used to redact the signature of Paul Hunt.

**Paul Hunt**  
**For and on behalf of Howes Percival LLP**

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## Design Technical Note

### Representations to Design Guidance and Codes 2025

Appendix to Neighbourhood Plan  
Review 2025-2041 Consultation

# 1 Design Guidance and Codes 2025

This technical note has been prepared in response to Scraftoft Parish's consultation on a draft new Neighbourhood Plan. The draft Neighbourhood Plan includes Appendices 1-4, including a Design Codes and Guidance Report at Appendix 2. This note considers matters relating to the Draft Design Guidance and Codes 2025 – Issue 4 (06.03.25) prepared by Aecom.

## 1.1 Introduction (1)

The purpose of this Design Guidance and Codes document is to deliver design quality in new development consistent with the requirements of the National Planning Policy Framework (NPPF, 2024). This is supported and the clarity this provides to developers in bringing forward proposals within Scraftoft Parish.

The recognition that design codes and guidance will not automatically secure quality design outcomes and that variations from the requirements outlined in the document must be supported by evidence is recognised as a pragmatic approach. However, it is recommended that the reference to proposals of the 'greatest quality' (where variation from the Code is proposed), is amended to read 'equal quality' to ensure consistency with the main goals. In this way a higher bar will not be implied for proposals that deviate from the code, and will not discourage innovation.

## 1.2 Policy and Context Review (2)

The Design Quality Vision set out in this section of the Code is derived from the Neighbourhood Plan Vision Statement. The objectives associated with protecting the identity of Scraftoft and ensuring good quality new homes that meet local needs are supported.

Whilst there is no objection to the themes around: high quality housing; local identity; movement network; and natural environment frontage

identified with the Neighbourhood Plan Steering Group and their site visit, the Code ought to reference at 2.3 the wider contribution of the other 10 characteristics of well-designed places as part of a balanced approach to high quality placemaking.

### 1.3 Area Types Design Guidance and Codes (3)

The Code identifies four 'area types' covering Scraptoft, three of these are Settlement Area Types (SAT) and the fourth a Countryside Area Type (CAT). The CAT surrounds the built-up area of the village and is identified as contributing to the rural ambiance of the Parish. The Area Types Plan (Figure 6) should show the Strategic Development Area to the north of the built up area of the village to reflect the Allocation in the Local Plan, and reduce the extent of the CAT area accordingly

### 1.4 Parish Wide Design Guidance and Codes (4)

The Strategic Development Area referenced in the first paragraph under Section 4 should be identified on a plan for clarity. This will provide certainty for developers using the Code and will be consistent with one of the primary purposes of the document identified within Section 1 of the Code.

The recognition that the Parish-wide codes allow for flexibility and design innovation is welcomed and maintains consistency with national policy and guidance.

**Design Code 15: Uniform Roof Line** – '3 or 4 buildings with the same roof height can form the uniform roofline'. This is too specific and should be reworded to state that uniform rooflines will typically be found within formal building groupings and within high density areas.

**Design Code 16: Building Height** – 'Within the village, buildings should not exceed 2 storeys'. This is unnecessarily prescriptive and at odds with the supporting narrative that identifies a variation in the size and scale of buildings from single storey bungalows to 2.5 storey properties. Modification of the first bullet point under 16 is recommended to reference that varied building heights contribute positively to the character of Scraptoft but will typically not exceed 2 storeys in height.

**Building Typology** – Apartments and maisonette should be included as part of the acceptable mix of building typologies, which when sensitively designed, can make an important contribution to meeting demand for smaller, more affordable properties.

**Design Code 18: - Terraced Building** – Amend third bullet point to read 'Consistent setbacks within groupings...' to allow for well defined street

			<p>compositions, as stated, by avoid monotonous streetscapes.</p> <p><b>Design Code 19: Semi-detached building</b> – apparent inconsistency with <b>Design Code 16</b>, and reinforces the benefit of changing Design Code 16 as recommended above.</p> <p><b>Design Code 21: Density</b> – Recognition should be made to making efficient use of land in sustainable locations as one of the density considerations, consistent with national policy.</p> <p><b>Design Code 23: Woodland, Trees and Hedgerows</b> – recommends development should be designed to retain trees, particularly those of landscape and biodiversity importance. The objective seems to be seeking to increase tree cover, which can be achieved by other means, including new planting. Suggest the wording is amended to reflect this approach.</p> <p><b>Design Code 24 : Open Spaces</b> – ‘Development must not result in a net loss of biodiversity and should aim to achieve net gains’. Suggest this first bullet point is reworded to make clear that BNG is a requirement and any loss on site is required to be mitigated to achieve an overall net gain.</p>
4	<p>Leicester City Council - Planning, Development and Transportation Division</p> <p>Responding as neighbouring LPA</p>	Page 8	<p><b>It is acknowledged in Section 3 (p.8) of the Neighbourhood Plan Review that:</b></p> <p>“...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.”</p> <p><b>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 (Local Plan Policy SC1). 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”.</b></p> <p><b>In the Scraftoft Neighbourhood Plan Review Consultation Statement (February 2026), the Parish Council response to the above point was as follows: "The Adopted Local Plan is out of date. The Regulation 19 Local Plan Review contains the most up to date evidence of housing need."</b></p> <p><b>This is a misunderstanding of the planning system. The adopted Local Plan contains the local plan policies against which any planning application must be assessed, and to which any neighbourhood plan must be in conformity. The proposed submission Harborough Local Plan carries very limited weight as it, and its supporting documents and evidence, have not been scrutinised through Examination in Public. It is therefore unreasonable and contrary to the planning system to disregard the policies of the adopted Local Plan in favour of those in the emerging Local Plan.</b></p> <p><b>As the submitted Neighbourhood Plan Review is not in conformity with the adopted Harborough Local Plan, particularly in relation to the Scraftoft North SDA, it is contrary to basic conditions (d) and (e) of Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended).</b></p>

		<p>Page 13</p> <p>Section 4. Policies A: Housing and the Built Environment</p> <p>Housing Provision</p> <p>Policy HBE1: Settlement Boundary</p> <p>Policy ENV2: Local</p>	<p>The Neighbourhood Plan Review says on p.13 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 premature to conclude that the site will not be developed within the Local Plan period.</p> <p>Indeed, an application for up to 190 dwellings on part of the Scraftoft North SDA was submitted to Harborough District Council on 27 March 2026. It is expressly stated in the application that it is intended to be Phase 1 of a comprehensive SDA-wide development.</p> <p>The Scraftoft North SDA, which is a site allocation in the adopted Harborough Local Plan, falls outside the settlement boundary proposed in Policy HBE1. Through excluding an existing Local Plan site allocation from the settlement boundary, there is a policy conflict 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, it fails to meet basic condition (e), as set out in Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended).</p> <p>Furthermore, by restricting the settlement boundary to the existing built-up area of Scraftoft, Policy HBE1 does not contribute to the achievement of sustainable development. Thus, the Neighbourhood Plan Review fails to meet basic condition (d), as set out in Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended).</p> <p>In the Scraftoft Neighbourhood Plan Review Consultation Statement (February 2026), the Parish Council response to the above points was as follows: "The Local [Plan is] out of date and the strategic allocations within it have fallen away. 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 former, otherwise Scraftoft North would be in the emerging Local Plan."</p> <p>This is a misunderstanding of the planning system. The adopted Local Plan contains site allocations which have been independently scrutinised by Planning Inspectors at Examination and have been deemed to be either deliverable or developable (in relation to the Scraftoft North SDA specifically, its deliverability is reinforced by the recent submission of a planning application for development of up to 190 dwellings on part of the SDA). Through adoption of the Local Plan by the District Council, site allocations have democratic endorsement. The emerging Local Plan, its supporting documents, and evidence have not yet been tested at Examination, nor do they yet have the democratic backing of the District Council. It is also incorrect to assert that site allocations in an adopted Local Plan simply fall away with the passage of time. The adopted Local Plan and the policies and site allocations contained therein remain current local plan policy until such time as they are replaced by a newly adopted Local Plan.</p> <p>In order to meet the basic conditions, the City Council recommends that the settlement boundary is revised to include the Scraftoft North SDA.</p> <p>The City Council strongly objects to designation of 'Scraftoft Nature Reserve' as a Local Green Space on the following grounds:</p>
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		<p><b>Green Spaces</b></p> <p><b>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.”</b></p> <p><b>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 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></p> <p><b>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 and paragraph 13 of the NPPF (December 2024). 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 amended).</b></p> <p><b>C. 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 need to the other Leicestershire authorities. Scraptoft Parish Council is aware that the Scraptoft North SDA 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.</b></p> <p><b>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 Local Green Space, Scraptoft 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.</b></p> <p><b>In the Scraptoft Neighbourhood Plan Review Consultation Statement (February 2026), the Parish Council response to the above points was as follows: "Scraptoft has met its housing requirement up to 2041 through the proposed 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. LCC’s land is outside of the Neighbourhood Area and so the policies in the Scraptoft NP do</b></p>
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			<p>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 Scraftoft to take a disproportionate share."</p> <p>The proposed submission Harborough Local Plan, which contains the proposed allocations, has not been scrutinised by Planning Inspectors at Examination in Public and has not been approved for adoption by the District Council. Therefore, its current weight is very limited, and its proposals certainly do not outweigh the policies and site allocations in the adopted Local Plan. It is therefore premature to assume that Scraftoft has met its housing requirement to 2041 through the proposed allocations in the emerging Local Plan. In proposing to designate the Scraftoft Nature Reserve as a Local Green Space, the Neighbourhood Plan Review attempts to prevent a proportionate amount of development from taking place on an allocated site within the neighbourhood area.</p> <p>Criterion f) of the policy 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> <p>Please note that we wish to be notified of Harborough District Council's decision on the plan proposal.</p>
5	Leicester City Council – Senior Development Manager	<p>Page 9 Section 3</p> <p>age 14 Section 4. Policies A: Housing and the Built Environment Housing Provision</p> <p>Pages 15 &amp; 16 Policy HBE1</p>	<p>The proposed Neighbourhood Plan does not include the housing allocation SC1 in the adopted Harborough Local Plan of 2019 and as such it cannot be in conformity with this plan.</p> <p>The Neighbourhood Plan does not recognise or reflect the December 2024 NPPF. This requires that Neighbourhood Plans should not promote less development than provided for in other parts of the development plan for the area. Clearly the Scraftoft Neighbourhood Plan is not adhering to this requirement given it does not recognise the housing allocation in the adopted Harborough Local Plan and furthermore seeks to designate the SNSDA as being outside of the Settlement Boundary and a substantial portion of the site (approx. 35 acres) being identified as a protected Local Green Space.</p> <p>Leicester City Council, as landowner, considers that in relation to the SNSDA 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 December 2024 NPPF.</p> <p>The NP should be amended to allocate the SNSDA housing site in conformity with the adopted Harborough Local Plan.</p> <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 above.</p> <p>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) was submitted on 27<sup>th</sup> March 2026.</p> <p>The NP should be amended to allocate the SNSDA housing site in conformity with the adopted Harborough Local Plan.</p> <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><b>Section 4. Policies A: Housing and the Built Environment</b></p> <p><b>Settlement Boundary</b></p> <p><b>Page 24 Policy ENV 1</b></p> <p><b>Section 4. Policies B: The Natural, Historic and Social Environment</b></p> <p><b>Area of Separation</b></p> <p><b>Page 25 Policy ENV 2</b></p> <p><b>Section 4. Policies B: The Natural, Historic and Social Environment</b></p> <p><b>Local Green Spaces</b></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 Scruptoft North SDA. This is a flawed and premature position to take as it is assuming the Scruptoft 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 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 part of the Scruptoft 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>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>
6	<p>Natural England Hornbeam House Crewe Business Park Electra Way Crewe Cheshire CW1 6GJ</p>		<p>Scruptoft Neighbourhood Plan - Review - Statement of Modifications Thank you for your consultation on the above dated 19 March 2026.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p>

		<p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England does not have any specific comments on this draft neighbourhood plan.</p> <p>However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.</p> <p>Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in Natural England's Standing Advice on protected species .</p> <p>Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.</p> <p>We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.</p> <p>Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.</p> <p>For any further consultations on your plan, please contact: <a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a>.</p>