



Borough of Oadby & Wigston

Directorate of Community Services

Oadby and Wigston Borough Council Local Development Framework

Submission Core Strategy

Development Plan Document

Regulation 30(1)(E) Statement Of Representations



**Directorate of Community Services
Oadby and Wigston Borough Council
January 2010**

1. Introduction

- 1.1 Development Plan Documents are required to be prepared in accordance with the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. This Statement of Representations provides information in relation to consultation on the publication draft of the Core Strategy (Regulation 27), including the number of valid representations received and a summary of the main issues raised in those representations. This document therefore fulfils the requirements of Regulation 30 (1)(e).
- 1.2 The publication Core Strategy, accompanying Sustainability Appraisal and supporting documents were published on Monday 19 October 2009 for a period of 6 weeks public consultation ending on Monday 30 November 2009. Approximately 1,141 specific and general consultees were notified of the publication of the development plan document and invited to make representations during this period in terms of the soundness and legal compliance of the document.

2. Conformity with East Midlands Regional Plan

- 2.1 At the time of publication, and in accordance with Regulation 29 of the Act, the Council also sought the advice from the East Midlands Regional Assembly as to the general conformity of the Core Strategy with the East Midlands Regional Plan. The East Midlands Regional Assembly responded on 23 November 2009 to the effect that the Core Strategy was considered to be in general conformity with the Regional Plan. However, they also suggested some minor changes to some of the policies and/or supporting text.

3. Number of Representations Received

- 3.1 The Council received a total of 241 duly made representations from 37 different respondents.

4. Summary of Main Issues Raised

- 4.1 The following summary of main issues raised follows the same format of the Core Strategy for easy reference.

General

The Highways Agency feels that the approach to transport should be strengthened.

Hinckley and Bosworth Borough Council point out that there is inconsistency on the terminology used for Oadby (i.e. town centre as opposed to district centre).

Chapter 1 - Introduction

There was one comment in support of Chapter 1 in particular, the consideration of Oadby and Wigston to the wider context of the Leicester Principal Urban Area, as defined in the East Midlands Regional Plan.

Chapter 2 - The Policy Context

No comments were made in relation to Chapter Two.

Chapter 3 - A Spatial Portrait Of The Borough Of Oadby And Wigston

In general the Spatial Portrait of the Borough was supported, especially Wigston's role as the main town centre and as an area for growth. Where there were areas of concern, these were related to respondents requesting greater emphasis being placed on references to Conservation Areas, Landscape Character and Green Infrastructure. One respondent believed areas of the supporting text to be unsound because: the Local Infrastructure Plan proposes growth with inadequate consideration of necessary infrastructure, does not contain an effective developer contributions policy or satisfactorily reflects national policy in terms of addressing crime, security and community safety. In addition, reference to the inclusion of considerations in relation to Eco Towns was equally supported and objected to.

Chapter 4 - The Borough of Oadby and Wigston in 2026 – The Vision and Our Spatial Objectives

Respondents suggested several minor amendments to strengthen the spatial objectives of the Borough. These proposed changes relate to:

- stronger definition to the differing roles of Wigston and Oadby centres;
- greater protection and enhancement of mature trees and open spaces;
- remove reference to the potential to link into a tram line to Wigston;
- strengthen public transport network in relation to servicing employment related development, rather than just designing out the car through planning; and
- provide more detail in relation to promoting cycling and respecting Green Wedge boundaries.

There was particular support for spatial objectives 1, 2, 3, 4, 5, 6, 9 and 10 as they are considered the best opportunities for reducing the need to travel, develop sites in tandem with quality public transport, walking and cycling infrastructure, develop enhanced sustainable transport networks and aim to increase walking and cycling.

Chapter 5 - Achieving Sustainable Development – Our Spatial Strategy

There were no general comments in respect of Chapter 5. Policy specific main issues are detailed below.

Core Strategy Policy 1 - Spatial Strategy for Development in the Borough of Oadby and Wigston

In general the Council's strategy for locating development was supported. Where concerns were raised these related to:

- the need for greater detail in relation to the scale of employment development required in the Direction for Growth;
- the proposed phasing of the Direction for Growth was considered not to be sufficiently flexible;
- infrastructure requirements related to growth were insufficient in relation to police and policing;

- insufficient evidence for indicating the Direction for Growth south of Wigston, an alternative area proposed south of Oadby; and
- the Borough wide density target of 40 dph is considered too rigid

Key Diagram

There was support for the key diagram in terms of it being in line with Planning Policy Statement 12 by providing clarity in relation to strategic development.

Core Strategy Policy 2 - Development in the Centres of Oadby, Wigston and South Wigston:

There was overall support for concentrating development in existing urban areas, especially support for Wigston as the Borough's main town centre. The main objections relating to Core Strategy Policy 2 were:

- the need to promote car park management to encourage short trips;
- the policy is inconsistent with national policy in regard to centres defined as local as opposed to district centres;

Some respondents highlighted inconsistencies in the supporting text in relation to national policy and differing terminology

Core Strategy Policy 3 - Regeneration Schemes:

There was overall support for Core Strategy Policy 3. The sole objection from one respondent relates to the lack of developer contributions guidance. However, one respondent suggested that although the supporting text does indicate some locations where masterplans will be sought, there is no clarity in the policy as to when masterplans will be required.

Core Strategy Policy 4 - Sustainable Transport and Accessibility

Most of the comments received were in support of the content of Core Strategy Policy 4. One respondent felt that the policy was unnecessary as it was not locally focussed and duplicated national policy. Other comments related to a need to include reference to car parking in Oadby and consideration of on-farm development which is dependent on motor transport.

Core Strategy Policy 5 - Green Infrastructure:

Many of the comments received were in support of Core Strategy Policy 5. Issues of concern raised were:

- the need to identify strategic green infrastructure on the key diagram;
- the policy contains an over emphasis on biodiversity and should list opportunities in the policy not the supporting text;
- the policy should contain reference to protection and enhancement of existing areas of informal open space, natural green space and mature trees including a rolling programme of Tree Preservation Orders.

Chapter 6 - The Natural Environment

Core Strategy Policy 6 - Green Wedges

Several of the comments received were in support of Core Strategy Policy 6. The main concerns related to:

- the policy is considered to be inflexible and not provide the most appropriate strategy in relation to Green Wedges; and

- the policy is unsound and not legally compliant as it should include information on the extent of existing Green Wedges and any new requirements as they are a strategic designation.

There were recommendations to remove the word “outdoor” and the sentence “not accompanied by retail development” from the policy text.

Core Strategy Policy 7 - The Countryside

There were two comments in support of Core Strategy Policy 7. Issues of concern relate to:

- the policy is felt to be inconsistent with Core Strategy Policy 1 and Regional Policy;
- the policy should clarify that the limits to development will be established through the Allocations Development Plan Document; and
- the policy is not robust enough to protect the Green Belt, Green Wedges and open countryside from development

Core Strategy Policy 8 - Climate Change and Renewable Energy

There were several issues raised in relation to the content of Core Strategy Policy 8. Some raised concerns that the policy was not based on sound evidence and therefore contrary to national policy. It was further suggested that more guidance and flexibility needed to be included. It was felt the policy should give greater consideration to the capacity of local farms contributing to renewable energy generation.

Core Strategy Policy 9 - Flood Risk and the Water Environment

Comments received proposed rewording of Core Strategy Policy 9 to better reflect Planning Policy Statement 25 and also to clarify the status of Water Cycle Strategies, especially in relation to the Direction for Growth. There was also a recommendation to cross reference Core Strategy Policy 5 - Green Infrastructure with Core Strategy Policy 9 regarding habitat protection/creation in relation to Flood Risk Assessment.

Chapter 7 - Infrastructure and the Built Environment

Core Strategy Policy 10 - Community Infrastructure

Generally Core Strategy Policy 10 was supported with the caveat that issues of viability should be taken in account and that it can be demonstrated that necessary transport infrastructure can be delivered through public funding/development contributions. However, one respondent believed areas of the supporting text to be unsound because: the Local Infrastructure Plan proposes growth with inadequate consideration of necessary infrastructure, does not contain an effective developer contributions policy or satisfactorily reflects national policy in terms of addressing crime, security and community safety.

Core Strategy Policy 11 - Affordable Housing

Issues raised by respondents suggest the policy is unsound because:

- the policy does not reflect the findings of the Council’s Affordable Housing Viability Assessment;
- the policy is not flexible enough;

- the Council would not be able to seek higher than 20% Affordable Housing within the Direction for Growth if the current policy applied; and

Core Strategy Policy 12 - Housing Needs of the Community

The only comment received related to an objection to a requirement for all new housing developments to meet Lifetime Homes Standard.

Core Strategy Policy 13 - Provision of Gypsy and Traveller Sites

Concerns raised in relation to Core Strategy Policy 13 are:

- some of the policy criteria are unreasonable and therefore inconsistent with national policy;
- it is too onerous to require site development to be in accordance with national site design guidance; and
- the policy should implicitly state that the allocation of 1 pitch is a minimum requirement

Core Strategy Policy - 14 Design and Sustainable Construction

The one comment received states that Core Strategy Policy 14 does not satisfactorily reflect national policy in terms of addressing crime, security and community safety.

Core Strategy Policy 15 - Landscape and Character

There were two comments in support of Core Strategy Policy 15. Of the three other comments received, the main issues of concern are:

- the Core Strategy should indicate how it is intended to develop a criteria based approach to landscape character to be consistent with the East Midlands Regional Plan Policy 31;
- the policy should indicate either what new character will be required or where such guidance is to be provided; and
- the policy does not consider important landscape characteristics and recommendations as set out in the Landscape Character Assessment.

Core Strategy Policy 16 - Community Facilities and Places of Worship

Two comments were received. The first considered the first section of Core Strategy Policy 16 was too detailed for a Core Strategy and the second suggested the inclusion of a specific reference to theatres in the supporting text.

Core Strategy Policy 17 - Open Space and Facilities for Leisure, Recreation and Tourism

Two of the comments received believed Core Strategy Policy 17 to be inconsistent with Planning Policy Guidance 17 Planning for Open Space, Sport and Recreation. Firstly because there is no evidence that an open space audit has been undertaken and secondly it is not explicit that open space, sport and recreation facilities will not be developed unless an assessment clearly indicates the land is surplus to requirements. One respondent feels that the policy is unjustified because open space should not be protected where it may prejudice potentially sustainable development options for strategic housing and employment needs. It is suggested that the policy should promote the multifunctional benefits of open spaces. One comment feels the policy is unsound as it does not include Landscape Character Assessment recommendations.

Chapter 8 - Monitoring and Implementation Framework

One respondent feels the Core Strategy does not contain an effective developer contributions policy. Another respondent is concerned about the level of retail floor space proposed for Oadby as set out in the Delivery and Monitoring Framework.

Chapter 9 - Glossary

A respondent suggested that within the Glossary, “Cultural Facilities” is changed to “Community Facilities”. They suggest that the wording is changed to “Cultural facilities provide for health, welfare, social, educational, spiritual, leisure and cultural needs of the community”.

Appendix 1: Housing Trajectory

No comments were made in relation to Appendix 1.

Appendix Two: Infrastructure Plan

Several comments were received in relation to the Infrastructure Plan. There was one comment in support. Other comments received raised a range of concerns as follows:

- the Infrastructure Plan is considered to be non-effective and should be amended to indicate the range of infrastructure contributions likely to be required in association with the Direction for Growth although making clear that the detail will be contained in the Allocations Development Plan Document;
- the Infrastructure Plan should offer greater clarity as to when transport measures are required and what the triggers will be to signal their development;
- it is non-justified because it required more evidence to support need for the items included;
- it is non-justified because of the inclusion of the New Inn Pub site;
- there is failure to provide a policy that will address developer contributions and is therefore inconsistent with Planning Policy Statements 1 and 12;
- the Local Infrastructure Plan proposes growth with inadequate consideration of necessary infrastructure; and
- the Borough Council did not consult adequately and therefore the Core Strategy should be redrafted to include Police and Policing

Appendix 3: List of Saved Local Plan Policies to be Superseded by the Core Strategy

No comments were made in relation to Appendix 3.

Appendix 4: Eco-Town Considerations

One respondent considers that taking into account the impact of an Eco-Town and its relationship with the Core Strategy causes unnecessary confusion and uncertainty.

Appendix 1 – Schedule of Identified Comments Received

General	
The Highways Agency	Respondent feels that the approach to transport needs to be strengthened.
Hinckley and Bosworth Borough Council	Respondent points out that there is inconsistency on the terminology used for Oadby (i.e. town centre as opposed to district centre).
Chapter 1 – Introduction	
Government Office for the East Midlands	Respondent supports Chapter 1, in particular, the consideration of the Borough of Oadby and Wigston to the wider context of the Leicester Principal Urban Area, as defined in the East Midlands Regional Plan
Chapter 2 – The Policy Context	
No comments were made in relation to Chapter Two	
Chapter 3 – A Spatial Portrait of the Borough of Oadby and Wigston	
Government Office for the East Midlands	Respondent supports the Spatial Portrait.
The National Trust	Respondent suggests that Chapter Three is not justified and is inconsistent with national policy because of an omission of information relating to Conservation Areas that was previously agreed to be included by the Borough Council in earlier stages of preparation of the Core Strategy.
The Safron Trees Action Group	Respondent suggests that Chapter Three is not justified, not effective and inconsistent with national policy. The group suggests that more explicit reference should be made to the Landscape Character Assessment and the Green Infrastructure Plan within this chapter.
David Wilson Homes	Respondent suggest that the role of Wigston in the Borough as the main retail centre is important with regard to the spatial strategy that identifies the town as the main centre to accommodate growth.
Anne Garrick	Respondent suggests that paragraphs 3.27 – 3.32 are not effective because they lack clarity and fail to encourage the strong relationship between the built environment and the green infrastructure to be developed to facilitate walking in the Borough.
University of Leicester	Respondent supports the Core Strategy and views the document to be legally sound in relation to aspects that involve or impact upon the university.
British Waterways	Respondent suggest that paragraphs 3.66 – 3.68 are overprotective towards Kilby Bridge but in general terms, are pleased with much of the Core Strategy document and look forward to future collaboration with the Borough Council on matters of interest.
East Midlands Regional	Respondent considers it acceptable to outline the current status of the Pennbury Eco Town in the Regional

Assembly	Spatial Strategy within the Core Strategy. It is important that its status continues to be commented upon in further reviews of current and future housing growth requirements in the Leicester and Leicestershire Housing Market Area.
The Leicestershire Constabulary	Leicestershire Constabulary feels the Core Strategy does not contain an effective developer contributions policy or satisfactorily reflects national policy in terms of addressing crime, security and community safety.
Harborough District Council	Respondent does not consider reference to Pennbury Eco Town as justified and advises the Borough Council to remove all references in Chapter Three and Appendix Four.
Chapter 4 – The Borough of Oadby and Wigston in 2026 – The Vision and Our Spatial Objectives	
David Wilson Homes	Respondent consider that the vision and spatial objectives should better reflect the role of Wigston as a main town centre and the role of Oadby as a district centre as set out in Core Strategy Policy 2.
Government Office for the East Midlands	Respondent supports the vision and objectives in that they clearly state what will be delivered, where and to what purpose. Government Office for the East Midlands considers that this part of the Core Strategy could be best practice.
Harborough District Council	Respondent considers that reference should not be made to a tram line without evidence that it is realistic and deliverable.
Saffron Trees Action Group	Respondent considers that the protection and enhancement of mature trees and open spaces should form part of a spatial objective
The Theatres Trust	Respondent considers that the term ‘cultural activities’ should be incorporated into Spatial Objective 1 or 10 in order to underpin Core Strategy Policy 16 - Community Facilities and Places of Worship.
The University of Leicester	Respondent supports the aim to establish Oadby as a small town centre.
David Garrick	Respondent considers that Spatial Objectives 10 and 13 should provide more detail in relation to promoting cycling and respecting Green Wedge boundaries.
The Highways Agency	Respondent supports Spatial Objectives 1 to 4 which represent the most sustainable areas for growth based upon the range of employment opportunities, retail provision and other services, reducing the need for residents to travel further afield. It supports Spatial Objective 6 because it considers that Wigston is likely to provide the best opportunity to minimise the potential impact upon the strategic road network and to develop enhanced sustainable transport networks.
The Highways Agency	Respondent supports Spatial Objective 9 which focuses on the role of the transport system in providing access to local facilities and services, and Spatial Objective 10 which aims to increase walking and cycling. However, Spatial Objective 5 should ensure that future employment sites are supported by quality public transport, walking and cycling infrastructure.

Chapter 5 – Achieving Sustainable Development – Our Spatial Strategy	
Core Strategy Policy 1 - Spatial Strategy for Development in the Borough of Oadby and Wigston	
Bellway Homes	Respondent agrees that housing development should occur on suitable land outside of Oadby and Wigston Town Centres but within the Leicester Principal Urban Area.
David Wilson Homes	Respondent supports the Direction for Growth to the south east of Wigston as a location for growth to help meet strategic housing requirements. Whilst the proposals to incorporate a mix of uses including employment is supported, David Wilson Homes consider that the approach as set out in Core Strategy Policy 1 is insufficiently clear about the scale of employment land to be provided as part of the Direction for Growth.
David Wilson Homes	Respondent considers that the proposal to phase the Direction for Growth post 2017 is neither necessary nor appropriate and does not allow for the necessary flexibility to enable the strategy to respond to changing circumstances in accordance with PPS12.
East Midlands Regional Assembly	Respondent notes that the scale of development planned for the Direction for Growth at Wigston can be accommodated in the Borough without significant negative impacts on the wider highway network and that it forms the most sustainable location in comparison with other possible opportunities.
Government Office for the East Midlands	Respondent supports the clear statements of what is proposed and where it will be delivered, the exclusion of windfalls from the housing trajectory and the flexibility over the level of provision in the Direction for Growth.
Harborough District Council	Respondent supports the strategy for development in the Borough which is complementary to the emerging strategy for Harborough District. It suggests that the adopted Core Strategy should refer to the strategy for Harborough, once it is agreed.
The Highways Agency	Respondent supports the spatial strategy because it is seeking to focus development in the main urban areas and on previously developed land and requires high quality public transport links to be associated with the Direction for Growth. It considers that a transport specific implementation plan would clarify the basis upon which the transport improvements associated with the spatial strategy for the Borough will be delivered.
Leicester City Council	Respondent supports the spatial strategy for the Borough which reflects the adopted Regional Plan's strategy to focus development and regeneration within or adjoining the Leicester Principal Urban Area and which recognises the spatial relationship between the Borough and Leicester.
Leicestershire Constabulary	Respondent considers the Core Strategy proposes growth with inadequate consideration of necessary infrastructure, specifically because the Constabulary does not consider that sufficient regard is given to police and policing within those sections relating to infrastructure. It does not consider that sufficient weight is given in order to extract developer contributions.

Leicestershire County Council	Respondent supports the focus for development on the centres of Wigston, Oadby, South Wigston and elsewhere in the Leicester Principal Urban Area in order to improve the quality and levels of services and facilities. It supports the Direction for Growth to the south east of Wigston adjoining the Leicester Principal Urban Area, the reinforced role of Wigston Town Centre, and the phasing of the Direction for Growth post 2017 following investment towards infrastructure provision in the centres. The flexible approach to provision which facilitates the monitoring and management of future housing supply is also supported. The amount and type of employment land proposed is supported. Leicestershire County Council consider that continued close working with the Borough Council is essential to ensure that transport issues associated with delivering the spatial strategy are fully addressed.
Natural England	Respondent strongly supports the inclusion of a clear statement that the Borough Council will work in partnership with other agencies and organisations to identify and coordinate the provision and funding of infrastructure (including green infrastructure) to safeguard and enhance biodiversity and other environmental assets.
Wheatcroft and Son Ltd and Bloor Homes Ltd	Respondent objects because they do not consider that the Direction for Growth to the south east of Wigston is justified in terms of the background evidence available. They consider that the options previously consulted upon to identify a broad direction for growth were drawn too widely. They consider that an alternative Direction for Growth south of Oadby is more deliverable, less constrained in terms of environmental and landscape designations, more sustainable in terms of access to educational facilities and access by walking and cycling and has greater opportunities for accessibility via public transport.
Wheatcroft and Son Ltd and Bloor Homes Ltd	Respondent considers that the policy should provide more detail regarding the scale of employment land to be provided as part of the Direction for Growth.
William Davies Ltd	Respondent considers that a Borough wide requirement for 40 dwellings per hectare is too rigid and does not allow for any flexibility. It considers that housing density should instead be determined on a site by site basis with a minimum density of 30 dwellings per hectare.
Key Diagram	
David Wilson Homes	Respondent comments that the insertion of a Key Diagram within the Core Strategy is supported, and is in line with Planning Policy Statement 12, which requires local Authorities to illustrate locations for Strategic Development. The Key Diagram does this by providing sufficient clarity, especially in terms of the proposed Direction for Growth.
Core Strategy Policy Two – Development in the Centres of Oadby, Wigston and South Wigston	
David Wilson Homes	Respondent supports Wigston as the Borough's main town centre and recognises its primary role, thus suggests it's an ideal location for the Direction for Growth.

East Midlands Regional Assembly	Respondent comments that car parking management should be applied to encourage short stay for shoppers and visitors and discourage long stay commuter trips.
The Environment Agency	Respondent supports the concentration of development in existing urban areas, and the requirement for new buildings and public spaces being of high design quality. They also comment that space within urban areas is used more efficiently and suggest that multifunctional uses are found.
Highways Agency	Respondent welcomes the approach, focusing development in the centres, as it may assist in reducing reliance on the car and increase use of more sustainable modes of transport.
Leicester City Council	Respondent fully supports the sequential approach to the location of development within the Borough.
Leicestershire County Council	Respondent support Wigstons as the Boroughs main town, as it will improve access to a range of services and employment in the Borough. However there is a need to ensure sustainable modes of transport are promoted.
Sainsbury's Supermarkets Ltd	Respondent suggests that the policy is inconsistent with national policy and that Glen Road and Highcroft Avenue local centre should be changed to a district centre.
Hinckley and Bosworth Borough Council	Respondent refers to inconsistencies within the supporting text, for example differing terminology etc.
Government Office for the East Midlands	Respondent suggests the supporting text is not justified or consistent with national policy.
Core Strategy Policy 3 – Regeneration Schemes	
Leicester City Council	Respondent supports the policies requirement for masterplans and briefs to guide major development or regeneration schemes, however would like to be consulted if any come forward.
Leicestershire County Council	Respondent supports the criteria based policy requirements for areas of large scale change or regeneration schemes. However would like to be have concerns over applications taken into account.
Natural England	Respondent strongly supports the policies inclusion of masterplans and design briefs.
The Highways Agency	Respondent recognises the benefits of regeneration schemes in both reducing the need to travel and securing economic, social and environmental benefits for areas within the Borough.
University of Leicester	Respondent supports the overall approach of the Core Strategy, specifically policy three.
The Leicestershire Constabulary	Respondent suggests that the policy is not legally compliant, justified, effective or compliant with national policy as it does not set out developer contributions.
David Wilson	Respondent supports the requirements for masterplanning and the preparation of development briefs for large scale change.
Government Office of the East Midlands	Respondent suggests that although the supporting text does indicate some locations where masterplans will be sought; there is no clarity in the policy as to when masterplans will be required.

Core Strategy Policy 4 - Sustainable Transport and Accessibility	
David Wilson Homes	Respondent regards the proposed location for the Direction of Growth to the south east of Wigston as the most sustainable in the Borough because of Wigston's status as the main town offering the widest range of services and facilities.
East Midlands Regional Assembly	Respondent questions the need for Policy Four because of its lack of local focus and duplication of policy within the East Midlands Regional Plan.
The Highways Agency	Respondent welcomes development that seeks to reduce the need to travel and seeks the application of smarter choices through measures such as travel plans.
Leicestershire County Council	Respondent supports Policy Four particularly because it protects land that is identified as required to improve the transport system.
Natural England	Respondent supports the priority given to 'green' travel options such as walking, cycling and the use of public transport in Policy Four.
The National Farmers Union	Respondent suggests that Policy Four should consider on-farm development that is unlikely to be located near a public transport route and therefore is totally reliant upon car and lorry transport.
Oadby Trinity Methodist Church	Respondent suggests that Policy Four should include policy guidance on car parking in Oadby.
Core Strategy Policy 5 – Green Infrastructure	
Natural England	Respondent strongly supports the policy and believes it is a sound approach to the issue.
David Wilson Homes	Respondent suggests the policy highlights the importance of safeguarding and enhancing strategic green infrastructure within the Borough.
East Midlands Regional Assembly	Respondent suggests that strategic green infrastructure corridors should be identified on the Key Diagram.
Harborough District Council	Respondent supports the policy and look forward to opportunities for joint working.
Leicestershire County Council	Respondent suggests the policy to be ineffective as there is an over emphasis on biodiversity, and that the policy itself should list opportunities and not just the supporting text. Strong references to River Soar and Grand Union Canal Strategy is welcomed.
National Trust	Respondent supports the policy as it is appropriate and in accordance with regional and national policy.
Saffron Trees Action Group	Respondent suggests that the entire Core Strategy is unjustified and not effective, as there are key omissions to the evidence base and infrastructure for delivery. They also suggest that there should be more statements within the policy such as... 'protect and enhance existing areas of informal open space, natural green space and mature trees including a rolling programme of TPOs'.

Chapter 6 – The Natural Environment	
Core Strategy Policy 6 – Green Wedges	
Harborough District Council	Respondent supports the inclusion of Policy Six because it seeks to encourage partnership working with Harborough District Council on the Oadby, Thurnby and Stoughton Green Wedge.
Hinckley and Bosworth Borough Council	Respondent suggests that the word “outdoor” is removed from Policy Six.
Leicester City Council	Respondent supports Policy Six and would welcome working in partnership with the Borough Council on any review of the Green Wedges that cross administrative boundaries.
Leicester Racecourse Holdings Limited	Respondent considers Policy Six to be unjustified and non-effective because Policy Six fails to represent the ‘most appropriate’ strategy, nor is it ‘flexible’ to deal with a review of the existing Green Wedge boundaries.
The National Trust	Respondent supports the Borough Councils approach of identifying the uses that are appropriate in the Green Wedges.
Natural England	Respondent supports Chapter Six because the Green Wedges provide important recreational space for local people, as well as, an important link to the wider green infrastructure and open countryside.
The National Farmers Union	Respondent feels that the “not accompanied by retail development” should be removed from the forth bullet of Policy Six.
Wheatcroft & Son Limited and Bloor Homes Limited	Respondent considers Policy Six to be not legally compliant, non-justified, non-effective, and, inconsistent with National Policy. They suggest that the policy includes information on the extent of the existing Green Wedges and any new Green Wedges which may be required as they are a strategic designation.
Core Strategy Policy 7 – The Countryside	
Leicestershire County Council	Respondent states that Policy Seven is non-effective because its wording is inconsistent with the policy direction of the documents spatial strategy, as well as Regional policy. Policy Seven should clarify that the limits of development will be established through the Allocations Development Plan Document.
The National Trust	Respondent supports the approach the Borough Council have taken in Policy Seven and agree with all changes made since the Regulation 25 consultation document.
Natural England	Respondent strongly supports Policy Seven because it closely follows their own policy objectives with regards to the countryside.
Anne Garrick	Respondent deems Policy Seven to be non-effective because of wording in the supportive text in paragraph 6.7. The respondent suggests that the policy should be more robust in order to protect the Green Belt, Green Wedge and open countryside from development.
The National Farmers Union	Respondent deems Policy Seven to be non-justified because of wording in the supportive text in paragraph

	6.7 referencing affordable housing. They recommend that “and when viable, support the delivery of affordable dwellings for identified local need” should be removed from the text.
Core Strategy Policy 8 – Climate Change and Renewable Energy	
William Davis Ltd	Respondent considers the second paragraph of Core Policy 8 is inconsistent with national policy and is therefore unsound.
William Davis Ltd	Respondent feels that the inclusion in Core Policy 8 of a requirement for all new developments or major refurbishments to incorporate energy from decentralised or renewable sources is unsound as it is not based on sound evidence as per national policy.
Bellway Homes	Respondent feels further guidance and flexibility needs to be included within the policy but does not suggest how this can be achieved.
The Derbyshire Gypsy Liaison Group	Respondent feels it would be unreasonable to apply the Code for Sustainable Homes to Gypsy and Traveller developments.
David Wilson Homes	Respondent feels that the Code for Sustainable Homes targets in Core Strategy Policy 8 do not reflect national guidelines.
National Farmers Union	Respondent feels the supporting text does not identify the capacity local farms have for contributing to renewable energy generation.
Core Strategy Policy 9 – Flood Risk and the Water Environment	
Environment Agency	Respondent suggests the wording of paragraph 1 of Core Strategy Policy 9 should be re-worded to better reflect PPS25.
Environment Agency	Respondent feels that the Green Infrastructure policy should identify the broad areas where habitat creation/protection could be considered as part of flood risk assessment.
Environment Agency	Respondent recommends paragraph 6.39 be slightly re-worded to clarify the status of Water Cycle Strategies and in particular their relationship to the Direction for Growth.
Chapter 7 – Infrastructure and the Built Environment	
Core Strategy Policy 10 – Community Infrastructure	
David Wilson Homes	Respondent supports the concept of partnership working between the Borough Council and all key infrastructure providers and developers in Policy Ten. It should be ensured that issues of viability are taken into account.
The Highways Agency	Respondent supports the inclusion of developer contributions to support the provision of community infrastructure within Policy Ten and the inclusion of an Infrastructure Plan in the appendices. They also suggest that the Borough Council demonstrate that the transport infrastructure required to support the growth can be delivered through public funding or developer contributions.

The Leicestershire Constabulary	Respondent deems Policy Ten to not be legally compliant, non-justified, non-effective and not compliant with National policy because there are no developer contributions policies in place for developers to follow.
Natural England	Respondent strongly supports Policy Ten because it identifies the need for contributions to support on and off site infrastructure, including elements of green infrastructure seen as essential in association with new development.
Core Strategy Policy 11 – Affordable Housing	
William Davis Ltd	Respondent feels that Core Strategy Policy 11 does not reflect the conclusions of the Council’s Affordable Housing Availability Assessment making it inconsistent with national policy and is therefore unsound.
Wheatcroft & Son Ltd and Bloor Homes Ltd	Respondent feels that the wording of the policy is not flexible enough.
Wheatcroft & Son Ltd and Bloor Homes Ltd	Respondent feels that with the Direction for Growth emanating from Wigston the Council will not be able to seek higher than 20% affordable housing as stipulated in the policy.
William Davis Ltd	Respondent disagrees with the requirement for all new housing to meet Lifetime Homes Standards.
Core Strategy Policy 13 – Provision of Gypsy and Traveller Sites	
Traveller Law Reform Project	Respondent feels that some of the criteria in Core Policy 13 are unreasonable and therefore inconsistent with national policy rendering the policy unsound.
Traveller Law Reform Project	Respondent feels that paragraph 7.14 is too onerous in relation to the need for any site development to be in accordance with national site design guidance.
Leicestershire County Council	Respondent feels that Core Policy 13 needs to implicitly state that the allocation of 1 residential pitch is a minimum requirement.
The Derbyshire Gypsy Liaison Group	Respondent feels that the single pitch requirement in the policy should be more implicitly referenced.
Core Strategy Policy 14 Design and Sustainable Construction	
Leicestershire Constabulary	Respondent feels that the policy does not satisfactorily reflect national policy in terms of addressing crime, security and community safety.
Core Strategy Policy 15 - Landscape and Character	
East Midlands Regional Assembly	Respondent comments that the Core Strategy should indicated how it is intended to develop a criteria based approach towards ensuring that development proposals respect intrinsic landscape character in urban fringe areas, as set out in Policy 31 of the Regional Plan.
Government Office for the East Midlands	Respondent states that the Policy should indicate what character will be required in new development or state where such guidance is provided.
The National Trust	Respondent supports the Policy which is specifically linked to the unique landscape character of the Borough

	and is fundamental in ensuring that new development is appropriate to, and will reinforce, the distinctiveness of the Borough.
Natural England	Respondent supports the Policy which concurs to its approach to landscape protection and enhancement.
Saffron Trees Action Group	Respondent considers that important landscape characteristics and recommendations in the Landscape Character Assessment have not been included in either the Green Infrastructure Plan or the Core Strategy itself.
Core Strategy Policy 16 - Community Facilities and Places of Worship	
Hinckley and Bosworth Borough Council	Respondent considers that the first section of the Policy is too detailed for a Core Strategy.
The Theatres Trust	Respondent considers that the supporting text should specifically refer to theatres.
Core Strategy Policy 17 – Open Space and Facilities for Leisure, Recreation and Tourism	
Government Office for the East Midlands	Respondent suggests that the policy should identify what improvements are needed in terms of Open Space and Facilities for Leisure, Recreation and Tourism and set it out in the policy.
Harborough District Council	Respondent supports the policy.
Leicester Racecourse Holdings Ltd	Respondent suggests that the policy is not justified, effective or consistent with national policy as there is no evidence that the Borough Council have undertaken an open space audit, as set out in Planning Policy Guidance Note 17.
Leicestershire County Council	Respondent suggests that the policy is not justified as open space should not be protected unless it has been reviewed in relation to use as a sustainable development option for strategic housing and employment needs.
The National Trust	Respondent suggests that the policy should promote open spaces as having multi functional benefits, in particular maximising the contribution of the sites to biodiversity and addressing flood water storage issues.
Saffron Trees Action Group	Respondent suggests that the entire Core Strategy is unjustified and not effective, as there are key omissions to the evidence base and infrastructure for delivery. This is due to the Landscape Character Assessments recommendations not being included within the document.
Sport England	Respondent suggests that the policy is not consistent with national policy set out in Planning Policy Guidance Note 17, as it does not explicitly state that open space, sport and recreation facilities should not be built on unless an assessment by the applicant clearly indicates that the land is surplus to requirements.
Chapter 8 – Monitoring and Implementation Framework	
Leicestershire Constabulary	Respondent feels the Core Strategy does not contain an effective developer contributions policy.
Oadby Trinity Methodist Church	Respondent is concerned about the level of retail floor space proposed for Oadby as set out in the Delivery and Monitoring Framework.

Chapter 9 - Glossary	
The Theatre Trust	Respondent suggests that within the Glossary, “Cultural Facilities” is changed to “Community Facilities”. They suggest that the wording is changed to “Cultural facilities provide for health, welfare, social, educational, spiritual, leisure and cultural needs of the community.
Appendix 1	
No comments were made in relation to Appendix 1.	
Appendix Two – Infrastructure Plan	
The East Midlands Regional Assembly	Respondent welcomes the inclusion of a detailed implementation plan for local infrastructure delivery.
David Wilson Homes	Respondent considers Appendix Two to be non-effective and recommend that the Borough Council amend the Infrastructure Plan to indicate the range of infrastructure contributions likely to be required in association with the Direction for Growth, but to make clear that detailed contributions will be established through the Allocations Development Plan Document. Greater flexibility for the delivery of the Direction for Growth should also be given.
The Highways Agency	Respondent suggests that Appendix Two should offer greater clarity as to when transport measures listed in the Infrastructure Plan are required and what the triggers will be to signal their development. By using the recently completed Transport Study, the Borough Council should identify the developer contributions required to demonstrate that the strategy is appropriate and deliverable in transport terms.
Leicestershire County Council	Respondent deems the Infrastructure Plan to be non-justified because it requires more evidence to support need for the items included; the plan should reflect the need for additional places at upper school level in Oadby and Wigston; and, there are details still to be agreed by the County Council in relation to the Bobbin Factory, South Wigston.
Xibis Limited	Respondent considers Appendix Two to be non-justified because of the inclusion of the New Inn Pub site, Oadby, which has been earmarked as “committed” for 12 affordable residential units.
Appendix 3 - List of Saved Local Plan Policies to be Superseded by the Core Strategy	
No comments were made in relation to Appendix 3.	
Appendix 4 - Eco-Town Considerations	
Harborough District Council.	Respondent considers that taking into account the impact of an Eco-Town and its relationship with the Core Strategy causes unnecessary confusion and uncertainty.