

Appendix D7 List of comments received and responses of Oadby and Wigston Borough Council

STAKEHOLDER	COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
GENERAL COMMENTS		
Government Office for the East Midlands (GOEM)	<p>General concerns</p> <p>The Government Office for the East Midlands notes with some concern that this current consultation paper does not take the local planning authority or its consultees much further forward than the Issues and Options paper published in April 2006. In that context, much of the advice Government Office for the East Midlands provided to that consultation on 1 June 2006 still applies.</p>	Agreed.
Government Office for the East Midlands (GOEM)	<p>General concerns</p> <p>The context of the Borough as adjoining the second largest city in the East Midlands has not been fully taken into account neither on the Key Diagram nor in the objectives or policies.</p>	Include more information on how the Borough fits with its local context. Consider a local context section.
Government Office for the East Midlands (GOEM)	<p>General concerns</p> <p>The suggested Retail Hierarchy is contrary to Planning Policy Statement 6 in ascribing Regional Centre status to out of town retail parks in Blaby District, and perverse in ascribing equal status to Wigston, Oadby and South Wigston. The Key Diagram does not define the extent of the proposed Town Centre Area Action Plans, and the Core Strategy as a whole does not provide a strategic context for such Area Action Plans.</p>	Undertake further work on the Key Diagram, objectives and policies in order that they better reflect the local context.
Government Office for the East Midlands (GOEM)	<p>General concerns</p> <p>In terms of progression towards submission, the policies are</p>	<p>Comments noted.</p> <p>Change Required – South Wigston to be defined</p>

underdeveloped. As currently formulated they fail to make the strategic decisions expected of a Core Strategy.

as a district centre; Oadby a district centre (but with aspirations to be a town centre (this to be set out in the strategic objectives and backed up by a town centre masterplan)); Wigston a town centre.

The Theatres Trust

Core Strategy further consultation

Comments Noted.

Thank you for your letter of 26 November consulting The Theatres Trust on the Regulation 25 consultation on the Core Strategy, also known as the Preferred Options.

No Change

The Theatres Trust is an Advisory Non-Departmental Public Body and a statutory consultee on planning applications that affect land on which there is a theatre and was established by The Theatres Trust Act 1976 *to promote the better protection of theatres*. This applies to all theatre buildings, old or new, and regardless of whether or not they are still in use as theatres, in other uses, or disused. Our main objective is to safeguard theatre use or the potential for such use but we also provide expert advice on design, conservation, property and planning matters to theatre operators, local authorities and official bodies.

Due to the specific nature of the Trusts remit we are concerned with the protection and promotion of theatres and therefore expect to see policies dealing with cultural facilities.

General comment:

Considered and Noted.

University of Leicester (Agent is Turley Associates)

The University is disappointed that the document does not make any acknowledgement of the existence of the University Campus within the Oadby and Wigston Borough Council Boundary. The Campus occupies a significant area of land within the District and its students and staff makes a significant contribution to the local economy through the use of shops and services, particularly in Oadby town centre. The Campus also provides sporting and conference facilities which are used by

Refer to the role of Leicester University's Oadby Campus in the Spatial Portrait section

Environment Agency (Evidence supporting this provided)	<p>the local community. The University would therefore request that reference is made to the University Campus in the Spatial Portrait section of the Core Strategy document.</p> <p>Groundwater Issues – General Comment</p> <p>Development of any Brownfield sites should be accompanied by, in accordance with Planning Policy Statement 23, a desktop study for potential contamination, to ensure that contaminants are not mobilised and enter groundwater supplies or watercourses.</p>	<p>Agreed. This is dealt with in Core Strategy Policy 13 Strategic Development Management Strand bullet point 4 ‘Undertaking appropriate site investigations and remediation when developing contaminated land to reduce risk to human health and the environment’</p>
Environment Agency (Evidence supporting this provided)	<p>Waste Issues – General Comment</p> <p>Sustainable waste management is a key consideration for growth strategies, regeneration and the prudent use of resources. Producing less waste and having the appropriate infrastructure that enables its use as a resource are important for achieving sustainable communities and breaking the link between economic growth and the environmental impact of waste.</p>	<p>This will be referred to in the support text to the relevant policy</p> <p>Agreed. This is identified in Strategic Objective 14 and supported by a number of policies throughout Core Strategy.</p>
Natural England	<p>Generally happy with content, although have a number of suggestions;</p> <p>An explicit definition of ‘sustainable development’ should be included within the vision statement.</p>	<p>This is referred to in spatial objective 8</p> <p>It is not the role of the Core Strategy to provide an explicit definition of sustainable development</p> <p>No change</p>
Natural England	<p>The report card style for the evidence base does not provide enough information.</p>	<p>Agreed</p> <p>Change Required: Strengthen the State of Oadby and Wigston section</p>
Natural England	<p>Also paragraph 1.45 needs further elaboration, a fuller explanation on the key pressures on landscape and biodiversity will strengthen this section considerably.</p>	<p>Agreed.</p> <p>Change Required: Provide a fuller explanation on the key pressures on landscape and biodiversity in the</p>

Natural England

As previous comments suggested, the locations of Sites of Special Scientific Interest and key biodiversity sites need to be graphically represented.

State of Oadby and Wigston section

Agreed.

Change Required – SSSIs to be shown on Key Diagram. Key Biodiversity Sites to be shown on a map illustrating Green Infrastructure.

Agreed. Whilst the Core Strategy is not concerned with individual land allocations, in the context of Strategy Policy 1 this land would be considered to be within the urban area of the Borough. The '800 metre rule' stems from Managing the Supply of Housing Land SPG related to the adopted Local Plan and is not a consideration in the context of the Core Strategy.

Mr T Walker (Agent is Landmark Planning Ltd)

Suggested Alternative Sites

The respondent owns land within and adjacent to the existing boundary of Oadby.

The first site forms 1.18 ha of land off Pipistrelle Way, Oadby (Plan 1). This site is incorporated within the established settlement boundary and is surrounded by residential development. It has previously been identified as part of the existing Local Plan and Urban Capacity Study (2003) as being suitable for residential development. The site has direct access to the highway network and all utility services. A number of facilities are within walking distance, in particular a primary school, country park and supermarket. It does not form an important undeveloped land or formal open space and has limited ecological value. A wildlife corridor along the boundary of the site can be protected or enhanced within any development. Development of this and similar sites within the defined limits should be in advance of urban extensions, as outlined in Core Strategy Policy 1. For such sites to be developed, the 800 metre rule needs to be relaxed or withdrawn.

No Change

Mr T Walker (Agent is Landmark Planning Ltd)

The second site forms land adjacent to Oadby Grange (Plan 2). This provides sufficient flexibility to incorporate a smaller scale extension (c. 300 dwelling) without substantial impact upon the countryside. The southern element in particular already contains copses of trees to the north-east, screening any potential development from the countryside. It would also enable the enlargement of the adjacent country park as part of

The Core Strategy is not concerned with individual land allocations. However, this land is identified as Country Park in the Adopted Oadby and Wigston Local Plan. This was in order to provide recreational amenity space, access to the countryside and a buffer to development in the context of recent development in the vicinity. That function of this

Sport England

the development, to the benefit of the wider community. Both pedestrian and vehicular access is possible, enabling connectivity to the established settlement. Provision of a number of smaller, more discrete, extensions such as this site should be considered more favourable to the large-scale loss of countryside in one location for the reasons outlined above.

Core Strategy

You will no doubt be aware that Sport England has developed extensive guidance for local authorities to assist them in the development of Local Development Framework policies and documents that include policies for sports facilities. Whilst the Core Strategy deals with the majority of sport and active recreation strategy objectives it would be appropriate to review the guidance available. The link to general guidance on policy development for sport on Sport England's website is in the representation.

The advice on Sport England's website specifically includes policies for inclusion in core strategies and includes checklist of potential policy content relating to sport and some examples of good practice. This can be seen in the representation.

Core Strategy Policies should also place a strong emphasis upon designing quality places, which includes high quality public places, and promoting walking and cycling. A document you may wish to draw upon in developing your approach (and refer to in your list of useful document) is Active Design, which suggests practical ways in which good design can facilitate a more active and sporting community. This can be seen in the representation.

It is noted that the Play and Open Space Supplementary Planning Guidance was adopted in 2004 and that a Preliminary Open Space and Recreational Facilities Assessment was due to

piece of land still remains.

No Change.

Considered and Noted.

be reviewed spring 2008, I am unsure if this will lead to an update of the Play and Open Space Supplementary Planning Guidance. I would draw your attention to the Lichfield Core Strategy Inspectors report, in particular, paragraphs, 2.74 through to 2.80, which cover this issue. The conclusion was that the policy was un-sound, because a robust PPG 17 study had not been carried out.

You should also be aware that, the previous national sports strategy, Game Plan, the Government's strategy for delivering sport and physical activity, has been replaced by Sport England's Strategy 2008-2011. This can be accessed on our website at: strategies that have now been superseded.

Change 4 Sport, the East Midlands sports strategy has also been replaced by the new national strategy and will not be updated.

Sport England

We would take this opportunity to support Key issue 8 with respect to the protection and development of playing fields, sporting and active recreational facilities.

Considered and Noted.

Sport England

Support Strategic objective 11 (SO11)

Considered and Noted.

Sport England

Support Core Strategy policy 8 (CS8)

Considered and Noted.

Sport England

Support Core Strategy policy 22 (CS22)

Considered and Noted.

Harborough District Council

General Context:

Agreed.

It would be helpful if the context could describe the Boroughs relationship with its neighbouring Districts or set out where it fits within the sub-region. As a spatial plan, there should be some analysis / recognition of its dependency on Leicester and how this affects its role. Two of the areas of search for future housing development will impact considerably on Harborough District (referred to in due course) and therefore the important

Change Required: Include more information on how the Borough fits with its local context. Consider a local context section

relationship between the Borough and Harborough District could be emphasised more clearly.

Highways Agency

Strategic Road Network Context;

Based on the Regional Network Report for the East Midlands the strategic capacity of the M1 is demonstrated by its level of stress, which relates to the daily flow divided by daily capacity on the route. This capacity is calculated by the maximum sustainable traffic flow in the peak hour. Where roads are congested for longer than the peak periods, it results in stress levels which are more than 100 per cent.

The M1 operates at between 130-150 per cent stress on the northbound section to the west of Leicester which indicates that the route is suffering from significant delays. The southbound section operates at between 90-100 per cent stress and highlights that at this strategic level there may be limited additional capacity on the network. It is important however that this picture does not mask junction specific capacity issues, particularly around junction 21, where further development in the area may accentuate delays.

Concerns also exist over the long term strategic capacity. By 2026 it is anticipated that the M1 will again be operating at stress levels over 100 per cent at Leicester. The progression of the proposals within the Core Strategy should therefore be viewed within this context.

General Comment

The Policies are written at strategic level which does not give spatial or specific guidance for residents, developers or other agencies.

Leicestershire County Council

Comments regarding the Strategic Road Network are noted. However, the Core Strategy is required to be in conformity with the level of growth allocated to the Borough by the Regional Spatial Strategy.

The Assessment of Highways and Transportation Implication Study which has informed the location of growth in the Borough fully takes into account issues relating to the Strategic Road network.

No Change Required

Agreed: Policies are required to be spatial. More spatial or specific guidance needs to be provided for residents, developers or other agencies.

Change Required – more spatial and specific guidance (eg amount of development proposed in particular locations) to be provided in the supporting text to policies.

Leicestershire Constabulary
(Evidence supporting this provided)

General Comment - Sustainable development as a Strategic objective

I would encourage the Council to consider this not only as a context for most other objectives but as a means to emphasise the necessary point that all new development should meet its infrastructure needs and should be designed to sustainable principles. I appreciate that your strategy favours re-investment in town centres however growth with circa 7,000 new residents, 5,700m² of new office employment and 7.6Ha of new industrial and warehousing employment will still need to be accompanied by investment in infrastructure including Policing. There is a danger that in seeking to make the most of Brownfield and intensify development in town centres the need for new infrastructure is underplayed and the cumulative effect of a number of developments in a locality on service provision is missed. It is also the case that urban infrastructures are more likely to be outworn and more expensive to upgrade or replace as opposed to that required for Greenfield development. Your urban concentration strategy is commendable but can only be sustainable if infrastructure is planned and secured at the same time. I believe such an objective would be a far more viable hook on which to hang Community Infrastructure Levy proposals and costing than a single policy [CS16] which ties to housing provision and town centres and indeed new development within existing infrastructure. You have a Chapter on sustainable development but this solely leads to the Sequential approach. In implementation and delivery of such an objective it would be relatively easy to use a checklist for sustainable design and

Agreed.

Change Required – Supporting text to set out the Council’s approach to Infrastructure provision in relation to new development. The establishment of a Local Infrastructure Partnership and production of a Local Infrastructure Plan.

Incorporate Infrastructure provision into Strategic Objective 4. Remove reference to ‘existing’ infrastructure

Mr and Mrs Henwood	<p>infrastructure provision. I believe this would add credibility to your plan.</p> <p>Transport</p> <p>The Borough should support an Eastern By-pass from the A46 to the A47 and then to the A6 and finally to a new junction on the M1 South of junction 21 to keep the bypass traffic out of the built-up area.</p>	<p>A major transport scheme of this nature would need to come forward through the Regional Spatial Strategy for the East Midlands. The Borough Council's Assessment of Highways and Transportation Implications does not indicate that major road building is necessary to mitigate against the amount of growth allocated to the borough through the Regional Spatial Strategy up to 2026</p>
Leicestershire Constabulary (Evidence supporting this provided)	<p>General comment</p> <p>The Approach to major development needs to be more readily spelt out. It is only really explored in relation to renewable energy or efficiency when in reality there will be assessments of transportation or traffic as well as impact on infrastructure like policing and no doubt education etc as well.</p>	<p>No Change.</p> <p>Agreed. This has been explored in the evidence base for the Local Development Framework and further information will be incorporated into the supporting text.</p>
Leicestershire Constabulary (Evidence supporting this provided)	<p>General comment</p> <p>Approach to the Eco town proposal. I entirely appreciate the stance the Council is taking however I believe your document acknowledges that Greenfield development cant be ruled out to meet your growth targets and in the light of this the question of the potential contribution a new town or Sustainable Urban Extension might make is unanswered. I only say this because I believe the link from new housing and employment to requisite new infrastructure is being more readily made at the moment in such Greenfield scenarios.</p>	<p>Change required – clearly set out the implications of new development in the supporting text to policies</p> <p>Considered and noted, the Core Strategy will take account of how an Ecotown could affect the objectives and policies in the Core Strategy. The Core Strategy will be reviewed to take full account of an Ecotown is this becomes necessary.</p>
The Coal Authority	<p>No specific comments to make at this stage.</p>	<p>No Change</p> <p>Considered and noted</p>
Leicestershire Constabulary	<p>General Comment: Crime, community safety and well being</p>	<p>Agreed.</p>

(Evidence supporting this provided)

I don't think this sustainability strand is sufficiently recognised in the document. The worrying trend of rising crime levels is identified and we know from the Sustainable Community Strategy that crime reduction is a high priority for residents but how does this work through in this Core Strategy?

Leicestershire Constabulary
(Evidence supporting this provided)

General Comment

Readily available guidance, the subject of past consultation by Leicestershire Police, is not referenced - e.g. on s106 requirements, neither is Safer Places - the National Guidance for Planning policy and control and secure and sustainable design. I attach a further copy of our current s106 requirements and copy guidance for Local Planning Authorities on Planning Policy Documents and their content. There are examples in your area [e.g. former South Wigston College site] where we have worked together to ensure appropriate contributions for policing infrastructure and I am obviously keen that the Core Strategy has the content to continue to support our partnership in this.

Change Required - Incorporate information with regard to the levels of crime experienced in the Borough along with measures to achieve crime reduction into the Spatial Portrait of the Borough.

Agreed in part: The Core Strategy is not required to reference all related guidance. However, the Core Strategy should be able to work together to achieve the overall spatial objectives of Sustainable Communities Strategy for the Borough.

However, the possibility of using Section 106 requirements to achieve safer communities should be included as a bullet point in Core Strategy Policy 21 – Developer Contributions to meet Community Needs.

NFU East Midlands

General Comment

We would also like to see redundant buildings being allowed to be converted to residential use if no viable business can be sited there.

Change Required - Core Strategy Policy 21 – Developer Contributions to meet Community Needs to include a bullet point to refer to 'policing infrastructure'

Disagree: Core Strategy Policy 8 – Development in the Countryside does not prevent conversion. Essentially, this is a matter of detail that is not relevant to the strategic policies contained in the Core Strategy.

Civil Aviation Authority

General Comment

Whilst the Civil Aviation Authority would not wish to comment on the local development plans, where officially safeguarded aerodromes lie within the Councils area of jurisdiction, we recommend that the Council considers the need of such aerodrome(s) within your development plan and consult with the

No Change.

Considered and noted. There is no aerodrome within the Borough. Where necessary, account will be taken of Leicester Airport at Stoughton in Harborough District.

No Change.

BWEA	<p>aerodrome operator (s) or licensee(s) directly.</p> <p>General Comments on behalf of the UK Wind Energy Industry</p> <p>BWEA welcomes the preparation of the Councils Local Development Framework and wishes to emphasize the important contribution that the Councils policies can make in contributing to both the National and Regional targets for renewable energy generation. BWEA strongly recommend that the Council introduce specific policies designed to deliver greater production of renewable energy, in order to minimise the impact of climate change.</p>	<p>Support noted. Core Strategy Policy 11 aims to to deliver greater production of renewable energy, in order to minimise the impact of climate change.</p> <p>No Change.</p>
BWEA	<p>General comment</p> <p>BWEA strongly recommend that the Council avoid using generic phrases which simply seek to encourage the use of energy efficiency, renewable energy and the minimization and management of waste and pollution, for example, as such phrases lack the detail and commitment necessary to ensure that such aspirations are achieved. BWEA therefore strongly recommend the inclusion of an overarching climate change policy within the Core Strategy document, addressing the above issues, and the inclusion of discrete, proactive policies on energy efficiency, renewable energy, sustainable design and construction, within the Development Control Development Plan Document, in order to provide detailed policy direction on each issue and to ensure that such environmental measures are delivered.</p>	<p>Agreed.</p> <p>Change Required – Core Strategy Policy 11 to become an overarching climate change policy.</p>
Network Rail	<p>Thank you for notifying Network Rail of the consultation regarding the Core Strategy Regulation 25 document. At this stage Network Rail has no specific comments to make on the current version of the document. However, at the Regulation 27 consultation stage, I would be grateful if you could notify Network Rail of the appropriate dates and documents.</p>	<p>Considered and noted</p> <p>No change</p>

Following this consultation I have some general comments on the preparation of the LDF and Network Rail's own aspirations which are set out below. I would be grateful if you could take the time to consider these and respond where necessary.

CHAPTER 1 - GENERAL

The National Trust

Para 1.45 – Environment

This Section appears to need some additional consideration. It is arguable that the first sentence is more about economic attractiveness than environmental qualities, and certainly the final sentence has nothing directly to do with environmental issues. In one of its earlier responses on the Core Strategy the National Trust noted the lack of statistics relating to built heritage in the Borough and in the current text there is no information about either the quantity or the quality of the Boroughs built heritage – number of Conservation Areas, preparation of Appraisals/Management Plans, Listed Buildings at Risk etc.

Noted.

Change Required – In the Spatial Portrait section provide statistics relating to:

- **built heritage in the Borough, the quantity and the quality of the Borough's built heritage (eg number of Conservation Areas, preparation of Appraisals/ Management Plans, Listed Buildings at Risk etc.)**
- **The nature conservation of the Borough – the extent of the resource, whether it is poorly managed, is it increasing, are there protected species under threat in the Borough?**

The National Trust

Whilst there is a single sentence on the natural environment it tells us little about the nature conservation of the Borough – the extent of the resource, whether it is poorly managed, is it increasing, are there protected species under threat in the Borough?

Under the Local Futures Audit, Historic Environment Information (listed buildings) falls under the Environment Profile.

No Change

English Heritage – East Midlands Region

The related audit summary (page 21) is also lacking any historic environment assessment. The State of Oadby and Wigston (page 21)

Under the Local Futures Audit, Historic Environment Information (listed buildings) falls under the Environment Profile.

No Change

Leicestershire Constabulary

The table on this page does not include a score for the historic environment. As part of the evidence base, this omission should be rectified.

Chapter 1

The Community Safety Strategy acts as evidence

(Evidence supporting this provided)

Para 1.12

At a local level perhaps the Community Safety Strategy could be mentioned along side the work of the Crime Disorder Reduction Partnership. After all you say there is a problem at 1.44.

base to the Core Strategy. It is not necessary to specifically refer to the document without a particular reason to do so.

No Change

Leicestershire Constabulary
(Evidence supporting this provided)

1.46 from the Oadby and Wigston Audit the outcome, as far as our partner working on crime is concerned, needs to be continued diligence. I don't think this is really recognised nor is this picked up in relation to sustainable design or the implications to maintain infrastructure. A strong link to the Sustainable Community Strategy is quoted yet it's not until Chapter 10 that the content of this is considered and even then there is no mention of community safety, crime, disorder, sustainable design and so on in any relationship to Quality of Life or Wellbeing objectives or themes.

Crime requires further consideration in the State of Oadby and Wigston section.

Change Required: Strengthen the State of Oadby and Wigston section

David Wilson Estates
(Agent is
Pegasus Planning Group)

Policy Framework – Paragraph 1.12

Para 1.12 outlines the relevant local policy context which has helped to inform preparation of the Core Strategy. Reference should also be made to the Leicestershire Sustainable Community Strategy 2008, which outlines a number of priority outcomes for the Oadby, Wigston and South Wigston Community Forum areas. For Wigston this highlights the importance of maintaining the diverse range of local facilities and shops and ensuring it remains an attractive and accessible place to shop, live and work. The Core Strategy needs to consider how the location of new development, including urban extensions, can help support these aspirations to support and enhance Wigston Town Centre as the main retail centre in the Borough.

Agreed.

Change Required – refer to Leicestershire Sustainable Community Strategy in Paragraph 1.12.

(Agent is Pegasus Planning Group)

Planning and Compulsory Purchase Act 2004, the Core Strategy will need to demonstrate that it has had regard to any Sustainable Community Strategy for its area. The Core Strategy therefore needs to consider the implications of both the Leicestershire Sustainable Community Strategy and the Oadby and Wigston Sustainable Community Strategy.

has taken account of the Leicestershire Sustainable Community Strategy and the Oadby and Wigston Sustainable Community Strategy.

It is not clear how the strategy has taken account of the Leicestershire Sustainable Community Strategy. The Council needs to consider its implications, particularly in relation to how development can help to support and enhance Wigston Town Centre.

CHAPTER 2 - GENERAL

Miller Homes Ltd

Chapter 2, Chapter 3, Key Diagram: Paragraph 2.31, 3.12 and 3.13

Support noted.

Miller Homes Ltd would like to support the Broad Locations for Development Growth within the Borough, in particular Areas B and C, as identified on the Key Diagram.

We would like to enforce our previous representations made in respect to the land south of Newtons Lane, Wigston and would request that the Council carefully consider this land for residential development within the areas of Growth, identified as B and C on the Key Diagram.

Mr and Mrs Henwood

New Development – Broad locations

Considered and noted: These comments will be taken into account in refining the Broad Locations for Growth

Concentrate new development in the town centre and not despoil the countryside. Do not develop Area E. Area B is better than Area C.

Leicestershire Constabulary
(Evidence supporting this provided)

Chapter 2

2.14, 2.15, 2.17, 2.18 and 2.20 are all around growth and, as I suggest above, in themselves perhaps warrant a *sustainability* objective in terms of infrastructure and design. I note we are talking about high density development -i.e. intensification with

Agreed. Further clarification in relation to Infrastructure is required.

Change Required: Amend Core Strategy Policy 3

new development across the Borough or town centres. There are many places in the document which talk about new development e.g. 3.15 to 3.17, 4.8 to 4.10, without picking up infrastructure provision. Likewise at 4.13 [you repeat this] isn't this all only feasible with infrastructure i.e. beyond just open space provision. Core Strategy Policy 2 talks about transport infrastructure but where is the rest? At Core Strategy Policy 3 you talk about taking community safety into account but I am suggesting something far more robust if for example regeneration schemes are to be sustainable. These will be flagship developments in your town centres?

Leicestershire Constabulary
(Evidence supporting this provided)

2.16 has an *also* on incorporating principles that reduce crime and improve community safety but I see no policy that flows from this in Chapter 12. There really needs to be one in my view perhaps again under the banner of sustainable design and following the objective that I suggest above. Policy 13 picks up the sustainable construction and designing for quality aspects of this but not community safety. The most holistic approaches I have come across on this are in the Planning Policy Guidance 3 Companion guide on housing, Safer Places which I reference above and the draft sustainable design Development Plan Document prepared by the Wetland Partnership. The importance of designing out crime as part of sustainable design policy is fully recognised in these.

to include an additional bullet point 'Identify the necessary infrastructure requirements of new development'

In the explanatory text refer to the Leicester and Leicestershire Growth Infrastructure Plan; the Infrastructure Partnership related to the Local Strategic Partnership and the intention to produce a Local Infrastructure Plan.

Policy 13 refers specifically to the need to incorporate design principles that strive to minimise crime and improve Community Safety. Therefore, there is no need to repeat this principle in the Strategic Development Management Strand of Policy 13.

No Change.

Leicestershire Constabulary
(Evidence supporting this provided)

2.17: the emphasis in Strategic Objective 5 is integrating new housing etc? Promoting again, in my view the need for new or improved infrastructure.

Agreed.

Change Required: Delete 'within the existing infrastructure' from Strategic Objective 4.

Leicestershire Constabulary
(Evidence supporting this provided)

2.22 Government Guidelines e.g. the Code for Sustainable Homes, spell out community safety and designing out crime and perhaps the importance of these as part of sustainable design umbrella should be included in wording here.

Strategic Objective 9 refers to a 'safe' Borough.

No Change.

Sainsburys Supermarket Limited
(SSL) (Agent is Indigo Planning
Limited)

Retail Hierarchy: page 34

These representations are submitted by Indigo Planning on behalf of Sainsburys Supermarket Limited (SSL), who have existing stores on Bell Street in Wigstons Town Centre and Glen Road in Oadby.

Glen Road, Highcroft Avenue:

As shown in the Allocations Development Plan Document Issues and Options Paper (June 2007), the Glen Road and Highcroft Avenue Neighbourhood Centre allocation includes the existing Sainsburys Supermarket, doctors surgery, public house and four units on Highcroft Avenue as shown on the attached plan. Sainsburys Supermarket Limited strongly support the proposed allocation of their existing Glen Road store and adjacent doctors surgery within the Neighbourhood Centre given that the store provides a key food store provision which serves the immediate shopping and service needs of the local community. The store is located within a predominantly residential area to the south east of the town centre, and serves a substantial walk in residential population within this area. Representing the focus for the day to day shopping and service requirements of these residents. When considered alongside the key community role performed by the doctors surgery adjoining the store, it is apparent that this wider site comprises a sustainable and appropriate location for a new Neighbourhood Centre.

David Wilson Estates
(Agent is
Pegasus Planning Group)

Retail Hierarchy – page 34

Para 2.40 – Main Towns

Comment:

The suggested retail hierarchy identifies Oadby, Wigston and South Wigston as *main towns* at the second level of the retail

Considered and noted: Comments relate to the promotion of a specific site. The shopping area at Glen Road, Highcroft Avenue is described within the list of centres in the Core Strategy as being a neighbourhood centre. This is what the respondent is seeking to promote. However, the retail hierarchy definitions contained in the Core Strategy are to be revisited due to other respondents concerns and further evidence for example how centres are categorised within the wider PUA.

Agreed: the retail hierarchy definitions contained in the Core Strategy are to be revisited due to other respondents concerns and further evidence for example how centres are categorised within the wider PUA.

hierarchy. Whilst in terms of a broad hierarchy this may be appropriate, it fails to distinguish between the different scale of retail floorspace, both existing and proposed, within the centres and the different roles these centres play. This could have implications for the strategy for future growth in the Borough.

CHAPTER 3 - GENERAL

Leicestershire County Council	Chapter 3: Achieving Sustainable Development	Support noted
Environment Agency (Evidence supporting this provided)	<p>In principle, the preferred approach is supported. The transport study being undertaken by the Borough Council (jointly with Harborough District Council) is welcomed and supported. The outcomes of that study will inform the County Council's view of the preferred location for the urban fringe development.</p> <p>Chapter 3 – Sustainable Development</p> <p>Chapter 3 – Achieving Sustainable Development deals with the adoption of a sequential approach, steering development towards Brownfield sites, which we applaud. As a first step in achieving sustainable development the use of Brownfield sites largely meets all sustainability criteria. However, the designation of a site is the first stage in the process. Either through further policies in the Core Strategy or coverage in subsequent Development Plan Documents and Supplementary Planning Documents we would hope that suitable policies seek to strike a balance between environmental, social and economic issues.</p>	<p>Agreed. Core Strategy Policies 2 and 3 and their supporting text allude to the need to strike a balance between environmental, social and economic issues.</p> <p>This balance will be dealt with further in subsequent Development Plan Documents such as the Allocations DPD and Town Centre Masterplan Area Action Plan DPDs.</p> <p>No Change</p>
Environment Agency (Evidence supporting this provided)	<p>Strong policy integration throughout the Core Strategy and subsequent Local Development Framework documents should enable win-win-win solutions, which meet all three objectives without significant of any of them. Attempting to balance or trade-off environmental issues against local economic or social benefits is unlikely to deliver the best solution for communities in the long-term. However, it is recognised that triple benefits are not possible in every case. Sometimes a win-win solution will be the best that can be achieved. The Agency is particularly keen to see the Core Strategy committed to securing net</p>	<p>The need for policy integration is noted. All other Local Development Documents must be in conformity with the Core Strategy and therefore the Core Strategy, its vision, strategic objectives and policies set the context for such integration.</p>

environmental gain with no significant loss to any interest. All development is capable of delivering benefits as well as fully mitigating against any environmental harm.

CHAPTER 4 - GENERAL

Environment Agency (Evidence supporting this provided)

Chapter 4

Agreed.

Chapter 4 – Town Centres and Regeneration: it is pleasing to see that green infrastructure is to be an important consideration in regeneration schemes. We would recommend that it is stipulated that planning regimes should consist of native species (ideally of local provenance) for maximum biodiversity benefit. Further information on the subject can be found at the following address: www.floralocale.org

Change Required: State in supporting text that the Borough Council encourages through its Nature Conservation Strategy the use of native species (ideally of local provenance) in the establishment of new habitats and Green Infrastructure.

In addition, the design of new developments should also seek to include initiatives such as green roofs, bird bricks, bat bricks and bug boxes to further enhance biodiversity. This goal is highlighted in Planning Policy Statement 9 which states:

The Strategic Development Management Strand to Core Strategy Policy 9 reflects PPS9 in terms of promote opportunities for the incorporation of beneficial biodiversity and geological features within the design of developments.

1. (iv) Plan policies should promote opportunities for the incorporation of beneficial biodiversity and geological features within the design of developments.

14. Biodiversity within Developments: Development proposals provide many opportunities for building-in beneficial biodiversity or geological features as part of good design. When considering proposals, local planning authorities should maximise such opportunities in and around developments using planning obligations where appropriate

CHAPTER 6 - GENERAL

Leicestershire County Council

Chapter 6

Agreed.

There is an inconsistent approach to Green Infrastructure (GI) in the Core Strategy. This would best be rectified by the inclusion

Change Required – Core Strategy Policy 9 will be rewritten and renamed to deal specifically

of an over-arching GI Policy.

with Green Infrastructure.

CHAPTER 10 - GENERAL

Environment Agency (Evidence supporting this provided)

Chapter 10

Chapter 10: Community Facilities, Leisure and Recreation discusses open space and meeting recreation needs. These open spaces should be striving for biodiversity enhancements alongside other objectives. This would ensure that people have access to quality, biodiversity rich, open spaces, helping towards achieving psychological well-being. I refer you to the following document for guidance on how this can be achieved, a copy of which is included with this response: CABI Making contracts for wildlife: how to encourage biodiversity in urban parks.

Agreed.

Change Required - Amend Core Strategy Policy 22 to state 'The Borough Council will seek to ensure that the proposed *quality*, quantity and access standards.....'

Refer to the Open Space, Sport and Recreational Facilities Study in supporting text. Expand the locally specific objective to enhance the quality of open spaces as supported by Strategic Objectives 10 and 12

SPATIAL PORTRAIT

University of Leicester (Agent is Turley Associates)

Spatial Portrait

The University of Leicester has been present in Oadby for more than half a century. Oadby is the main residential campus for the University and is regarded as one of the best in the UK. The Universities estate at Oadby comprises of 97 hectares including the sports fields on Stoughton Road. As the Council is aware, the University has been reviewing all of its land holdings at Oadby for a number of years and is currently embarking on a further Estate Review in order to help shape its long term plans to refurbish or replace some of the buildings of a poorer quality in the future. In order to retain its title as *University of the Year* (Times Higher Education 2008 09), the University of Leicester also hopes to improve and expand existing, and provide new facilities at its Oadby Campus which will not only benefit the University, but also the local community who will be able to enjoy an improved environment and access the University facilities. Any improvement or expansion of the Universities facilities at Oadby also has the potential to contribute to the local economy in indirect ways such as the increased use of Oadby towns centre facilities and services.

Considered and Noted.

Change Required – Refer to the role of Leicester University's Oadby Campus in the Spatial Portrait section.

David Wilson Estates (Agent is Pegasus Planning Group)

Spatial Portrait

The Spatial Portrait provides a broad picture of the social, economic and environmental context in the Borough. However, it does not provide a clear picture of the roles and relationships between the three main settlement centres of Oadby, Wigston and South Wigston. In developing a spatial strategy for the Borough it is important to recognise the different roles played by these existing centres. Wigston is the larger centre, providing significantly more retail floorspace than Oadby or South Wigston. The distinctions between these existing communities in terms of available services and facilities have potential implications for the development of the Core Strategy.

Agreed. The spatial portrait will be amended to illustrate the distinctive differing roles of each town centre and the relationships between them.

ACTION REQUIRED

The National Trust

Spatial Portrait of the Borough

This section especially that up to paragraph 1.39, includes no descriptive information about the Boroughs natural environment resources – if there are few or none then this in itself is an unusual feature that should be identified.

Agreed. Spatial Portrait will be amended to take into account this comment.

ACTION REQUIRED

The discussion also excludes any explicit assessment of climate change issues, including the current situation in respect of emission levels or related considerations such as flood risk, air quality or the availability of public transport.

KEY ISSUE 1

David Wilson Estates (Agent is Pegasus Planning Group)

Key Issue 1

Considered and noted

The preferred approach to the location of development, proposing the use of Brownfield sites and one large urban fringe site, is supported. This strategy is consistent with the Regional Plan and recognises the need to set out a robust long term strategy for future growth. This approach would also be sufficiently flexible to respond to lower than expected delivery of

Brownfield site opportunities. The preferred approach to employment provision involving the safeguarding of identified employment areas (key issue 4), could limit the opportunities available for development on Brownfield sites.

David Wilson Estates has interests in land west of Welford Road (site B) and considers that this provides a real opportunity to provide for a sustainable urban extension to help meet future housing needs in the Borough over the period to 2026 and beyond.

Mr T Walker (Agent is Landmark Planning Ltd)

**Key Issue 1; Figure 2; Paragraphs 3.12 – 3.13 and 3.16
Scale, Number and Location of Urban Extensions**

Agreed: the submission draft of the Core Strategy will address the concerns of this comment.

The Core Strategy provides no identification of housing levels to be provided through urban extensions. Calculation using the Regional Spatial Strategy requirement for the Borough (2250 dwellings) and the number of completions (662 between April 2001 to March 2008) and outstanding approvals (371 at 31 March 2008) in the Annual Monitoring Report (December 2008), highlights a maximum outstanding requirement for land to accommodate 1,217 dwellings (2250 – 662 – 371).

ACTION REQUIRED

It is likely that this figure will be reduced further by the ability to provide additional dwellings within the existing limits to development, but to what extent is currently unknown. The Strategic Housing Land Availability Assessment (SHLAA) will provide an insight into the anticipated number of new dwellings that can be accommodated within the limits to development. The outcome of SHLAA is therefore important in providing a clearer context for the Core Strategy. This is particularly relevant for Oadby and Wigston Borough Council, as the low annual requirement for the Borough (90 dwellings) can be substantially influenced by even a limited number of suitable sites being identified within the established settlement limits.

Regardless of the number of houses required, the scale of the

urban extension is insufficient to create a sustainable, self-sufficient community. A minimum scale of 1,500 dwellings is commonly cited to meet such a standard. The number of dwellings required as an urban extension will not therefore be sufficient to justify even a single *sustainable urban extension*, as the dwelling units required to 2026 will be 1217 minus development such as infill plots within the Borough.

If one sizeable urban extension is required, this will require the existing community facilities to be utilised, and generate few, if any, additional facilities within the extension itself. The extension is not likely to place the new housing closest to existing facilities or public transport routes, as the potential locations are positioned on the edges of settlements.

Provision of a number of smaller scale allocations could be viewed as a more appropriate way forward. This would enable the balanced expansion to all communities or towns within the Borough. Pepper-potting the extensions potentially allows the natural contours and existing landscape features to be used as defining boundaries, minimising the impact on the countryside and the visibility of the urban area from beyond. Larger extension by inference of their scale place new houses further from the established settlement, and thus likely to be further from existing facilities.

Smaller urban extensions will also have less impact upon the existing infrastructure. The distribution of new housing around the Borough would dissipate the additional use of infrastructure with less chance of causing significant issues or congestion.

Provision of a sizeable urban extension is likely to have a significant impact upon transport movements, with possible major investment in enhancements to make the development suitable. This would not be as cost-effective leaving substantial spare capacity.

A number of small-scale developments would also provide more security in terms of deliverability. There could be issues of major thresholds to overcome first, and if all development is tied to one area, and thus developer, it could affect delivery timescales significantly. As you know, deliverability is a critical factor, as referenced in the soundness of Local Development Framework documents on Planning Policy Statement 12 (Paragraphs 3.52 and accompanying box). Numerous smaller urban extensions should provide greater security for delivering the necessary housing requirements.

KEY ISSUE 2

David Wilson Estates
(Agent is
Pegasus Planning Group)

Key Issue 2

There seems to be some inconsistency between Key Issue 2 and Strategic Objective 11 dealing with Green Wedges. Key Issue 2 suggests that the preferred approach will be to change green wedge boundaries to reflect the location of new development, whilst the Strategic Objective indicates that the preservation of green wedges is deemed essential.

Whilst no longer including a policy on Green Wedges, the Secretary of State's Proposed Changes to the Regional Plan indicate that a review of existing Green Wedges or the creation of new ones will take place through local development frameworks. Compared with other Green Wedge locations around the Leicester Principal Urban Area, Green Wedge areas within Oadby and Wigston are particularly vulnerable to change, largely due to their limited physical extent. The scope to accommodate further development in these areas without threatening their integrity as strategically important areas of open land is limited. This needs to be taken into account in considering suitable options for further growth within the Borough.

Agreed: the submission draft of the Core Strategy will address the concerns of this comment.

ACTION REQUIRED

Environment Agency (Evidence

Key Issue 2

Considered and agreed: a Green Infrastructure

supporting this provided)

With regard to Key Issue 2 the management of green wedges on page 24 we have a number of comments to make. The primary purpose of green wedge policy is to manage urban growth but it is a policy that can also be used to facilitate the positive use of land as mentioned under 3.10 in the Strategic gap and green wedge policies in structure plans: main report. In this document, the protection of natural assets is discussed under 3.12 as part of this positive land management. Based upon the poor environmental grading given in the state of the district audit it is strongly recommended that the green wedge policy should strive for environmental enhancements within its realigned boundaries. Where possible these realignments and other green infrastructure provision should attempt to link up with strategic green infrastructure networks within Local Planning Authorities.

Strategy is currently being prepared and this along with the adopted Regional Plan plus guidance produced at county level will be used to ensure the development of appropriate and robust green wedge policy that seeks to facilitate the positive use of these areas.

ACTION REQUIRED

KEY ISSUE 10

Environment Agency (Evidence supporting this provided)

Key Issue 10

The land lying to the south of the Grand Union Canal, and to the north where a small stream runs under the canal near Kilby Bridge, is designated as floodplain. A map is enclosed for reference. The creation of a village envelope may be helpful in controlling the extent and nature of development around Kilby Bridge, but in order to ensure the requirements of Planning Policy Statement 25 are met, the boundary would need to be compatible with flood risk. For example, recreational uses of parts of the floodplain could be allocated (with appropriate design) but residential and commercial development of the floodplain in this area would be inappropriate. We would be happy to advise further – please contact Jon Vann on 0115 8463 653 if you wish to discuss.

Considered and agreed: the Council's Strategic Flood Risk Assessment (2007) accords with these comments

ACTION REQUIRED

SPATIAL VISION

Environment Agency (Evidence supporting this provided)

Spatial Vision

We support the emphasis on energy conservation highlighted in

Considered and agreed: these elements will be included in an amended spatial vision

Harborough District Council

the last bullet of the spatial vision on page 23. However, the spatial vision should also recognise that waste minimisation and sustainable waste management are also a key element of resource efficiency and community sustainability.

Spatial Vision:

The vision for the Borough would benefit from being more focussed and locally specific rather than a list of general objectives / aspirations which may apply anywhere. Again, it would be helpful to add aspects related to the spatial context of the Borough given its setting within the Leicester urban area.

Spatial Vision

The spatial vision presented for the Borough to 2026 appears to address the key issues of sustainability. However it is a relatively broad vision with little local specificity. PPS12 (paragraph 4.1) states that core strategies need to include an overall vision which sets out how areas and places within them should develop. It is considered that, in order to comply with the requirements of Planning Policy Statement 12, the vision should be more locally specific and should set out how the Borough as a whole and the main settlements are expected to develop over the period to 2026, including how much development is expected to take place and where it will be located.

As currently framed, the spatial vision is likely to fail the test of effectiveness. The Planning Inspectorate's guidance on Examining Development Plan Documents 2008, outlines key questions Inspectors will address in considering the soundness of Development Plan Documents. In testing effectiveness this will include considering whether objectives are specific to the place, and whether there is a direct relationship between the identified issues and the objectives.

The spatial vision needs to be more locally specific and set out a clear strategy for the future development of the Borough.

ACTION REQUIRED

Considered and agreed: the spatial vision will be amended to strengthen its local focus and its setting within the Leicester conurbation

ACTION REQUIRED

Considered and agreed in part: the spatial vision will be amended to strengthen its local focus and its setting within the Leicester conurbation. With reference to the vision needing to include how much development is expected to take place and where, it is felt this is too detailed for the vision but will be realised via the strategic objectives and/or policy

ACTION REQUIRED

David Wilson Estates
(Agent is
Pegasus Planning Group)

J H Hallam & Son Ltd (Agent is Marrons)

The Spatial Vision (page 23)

Considered and noted: agreement of the spatial vision

The Theatre Trust

The broad objectives set out in the Spatial Vision are supported

Considered and noted: agreement of the spatial vision.

Spatial Vision

We support your Spatial Vision and are pleased to see that the Borough will be able to *easily access well designed and welcoming cultural facilities*. We would have expected however for this topic to appear in Chapter 10 but are disappointed that it does not appear anywhere else in the document other than as a Spatial Vision.

East Midlands Regional Assembly

Spatial Vision

Considered and noted: agreement of the spatial vision.

This strikes strong accordance with the Regional Vision in the Draft Regional Spatial Strategy.

The National Trust

Spatial Vision

Considered and agreed: the spatial vision will be amended to strengthen its local focus and to address the concerns of this comment

This has clearly developed considerably from the original version, albeit the headline statement remains and this in itself continues to be supported. However, given the expansion of the Vision to include a number of more detailed aspirations for Oadby and Wigston it is considered that additional consideration is required:

ACTION REQUIRED

The final bullet point relating to the prudent use of resources or reducing energy use is welcome, but there are no statements about other climate change considerations such as reducing emissions, or reducing the need to travel.

There is no specific aspiration relating to the safeguarding and enhancement of the Boroughs heritage resources.

The reference to the rural environment is vague in particular it is unclear if this is a landscape character or a bio-diversity aspiration? It is noted that given the current poor natural

environment resource and the requirements of Regional Spatial Strategy that the Borough should be seeking a step-change in the level of bio-diversity in the Borough – and in part this can be achieved through improving nature conservation value in the urban areas as well as in rural ones.

STRATEGIC OBJECTIVE - GENERAL

Leicester Racecourse (Agent is Marrons) **Strategic Objectives (page 27)** Considered and noted

Mr and Mrs Henwood Strategic Objectives 3 to 14 are broadly supported.
Strategic Objectives Considered and noted

East Midlands Regional Assembly All Strategic Objectives have our full support and we hope that Green Wedges and Open Spaces can be protected.
Strategic Objectives Considered and noted

These have a very strong degree of accordence with the Regional Policy Objectives as set out in Policy 1 of the Draft Regional Spatial Strategy.

STRATEGIC OBJECTIVE 1

J H Hallam & Son Ltd (Agent is Marrons) **Strategic Objectives (page 27)** Considered and noted
Strategic Objective 1 is supported

STRATEGIC OBJECTIVE 2

Highways Agency SO2 – The agency fully endorses the objective to focus development on previously developed land, and at medium to high densities. This will assist in reducing the need to travel and support the viability of existing public transport services, thereby reducing the need to travel and availability of alternatives to the car. Considered and noted: agreement with SO2

Leicester Racecourse (Agent is Marrons) **Strategic Objectives (page 27)** Agreed in part. The spatial objectives will be revised to deal specifically with the location of development in town centres (spatial objectives 1 to 4) and the
Strategic Objective 2 – It is considered that this strategic

objective should, given its focus on concentrating development on suitable previously developed land within the Borough, embrace previously developed sites that may presently lay outside the planned limits of development for Oadby, Wigston and South Wigston respectively but adjoin/adjacent to the built up areas. If reliance is being made on delivery being focused from previously developed sites then sites that adjoin or adjacent to the current settlement boundaries should not be excluded from consideration. The fact that they may lay currently outside established limits of development should not prescriptively rule such sites from consideration. If considered suitable for re-development the planned limits of development would be extended to include the site in any adopted Local Development Document. This strategic objective should therefore be amended to read

growth of the built up area/settlement boundaries (spatial objective 5).

ACTION REQUIRED

*Concentrate new development on previously developed land **within or adjoining existing planned limits to development** and Oadby, Wigston and South Wigston Town Centres. We will seek to encourage medium to high density land use on suitable sites within the Borough.*

STRATEGIC OBJECTIVE 3		
The National Trust	Strategic Objective 3	Considered and disagree: Amended strategic objective 3 takes into account consultation responses from the Core Strategy preferred options consultation. The removal of reference to local aesthetic character was to combat the suggestion that the whole Borough had a local aesthetic character which is not a soundly based assumption. The spatial objectives will be revised to ensure that they are more locally specific and Spatial Objectives 8 and 12 now relate to specific instances where high quality design and the preservation of local aesthetic character is important. High quality design is still a main aim of this objective but in the
	<p>SO3 – Especially having regard to the core policy objectives in Regional Spatial Strategy and the acknowledged concerns about the quality of new development, particularly housing, in the East Midlands Region (e.g. previous CABA assessments) it is disappointing that the previous versions reference to <i>high quality design and preserve local aesthetic character</i> has been removed. It is considered that the reference only to being <i>in keeping with the character of the Borough</i> is a backward step. It is suggested that the previous wording is reverted to, or as a minimum that the objective of <i>high quality design</i> is reinstated.</p>	

amended version the objective has been widened to seek sustainable as well as high quality

STRATEGIC OBJECTIVE 5

Highways Agency

SO5 – Due to the levels of out commuting from the Borough which has been raised within the Core Strategy, the provision of sufficient employment land is welcomed by the agency. This would provide the potential to reduce commuting distances and therefore pressure on the transport networks.

Considered and noted: agreement with SO2

STRATEGIC OBJECTIVE 6

Highways Agency

SO6 – The inclusion of such an objective to reduce the use of the private car and encourage more sustainable travel provides a sound basis upon which to develop the Core Strategy and guide sustainable growth of the Borough. This approach is supported and encouraged by the agency.

Considered and noted: agreement with SO2

Highways Agency

SO6 – Reference to the use of smarter choices measures such as travel plans and promotion of home working may also be considered for potential inclusion as initiatives the authority may adopt in working towards this objective.

Considered and agreed: reference to Smarter Choices and other travel reduction approaches will be included in relation to this strategic objective as new Spatial Objective 9.

Leicestershire County Council

Strategic Objective 6:

It is unclear what is meant by 'affordable' highway network.

Considered and noted. The term affordable relates to the aim of trying to ensure that residents etc of the Borough are able to afford to use non-car transport modes and this will be made clearer in new Spatial Objective 9. Public consultation in relation to the Core Strategy, Town Centre Masterplans and Sustainable Community Strategy has often highlighted cost constraints of encouraging more people to use public transport

STRATEGIC OBJECTIVE 7

David Wilson Estates
(Agent is
Pegasus Planning Group)

Strategic Objective 7

This objective seeks to support the role of Oadby, Wigston and South Wigston town centres. The strategy needs to recognise

Considered and agreed: Strategic objective 7 and subsequent policy related to town centres needs to be strengthened to recognise the distinctions between each centre to enable development of

and reflect the different roles and characteristics of the three town centres. Wigston is the largest retail centre in the Borough and includes a number of community facilities and services. The Retail Capacity Study identified some 17,000 square metres of retail floorspace in Wigston with capacity for an additional 13,330 square metres of floorspace up to 2026. This compares with some 6,800 square metres of floorspace in Oadby with capacity for a further 5,200 square metres. The strategy needs to consider how the location of new development, particularly potential urban extensions, can help support and strengthen the role and function of Wigston town centre.

appropriate strategies for regeneration, investment and growth

ACTION REQUIRED

<p>David Wilson Estates (Agent is Pegasus Planning Group)</p>	<p>The strategy is not adequately justified as it fails to take account of the evidence relating to the different functions of the main urban centres within the Borough and does not reflect these differences in the strategy presented.</p> <p>The strategy needs to recognise the differences between the main urban centres of Oadby, Wigston and South Wigston and reflect these differences in an appropriate settlement hierarchy and decisions about the future location of development.</p>	<p>The new spatial objectives will include separate objectives for each centre (Spatial Objectives 2-4) and the growth of the Principal Urban Area (Spatial Objective 5) which will demonstrate the different roles of each centre, how they relate to each other and the growth of the Principal Urban Area.</p>
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STRATEGIC OBJECTIVE 8

<p>Highways Agency</p>	<p>SO8 – The promotion of walking and cycling within the Borough in terms of healthy lifestyles closely relates to promoting sustainability principles identified in the key issues section of the strategy. The agency supports measures which seek to increase walking and cycling and reduce the use of the private car, and the promotion of healthy lifestyles assists in this regard.</p>	<p>Considered and noted: agreement with SO2</p>
<p>Environment Agency (Evidence supporting this provided)</p>	<p>Strategic Objective 8</p> <p>Far from being sterile areas, floodplains can help towards meeting Strategic Objective 8, providing the recreational use, footways and cycleways, playing pitches as well as natural areas. In using land for these purposes there will be an</p>	<p>Considered and noted: the role floodplains can play will be incorporated into the supporting text of policies relating to leisure and recreation</p>

opportunity to develop linked recreational space along the floodplain that can deliver against the targets for healthy lifestyle, reducing obesity, designing out crime, making foot and cycle use safe, quick and easiest first option. Through appropriate design and landscaping the flood routes can deliver significant gains for biodiversity, connect green spaces, bring people into closer contact with our natural environment and ensure the long term protection for open space in Oadby and Wigston. In addition, climate change will be taken into account by preparing Oadby and Wigston for flood events that are expected to increase in number and extent. These wider benefits of dealing with flood risk should be highlighted.

STRATEGIC OBJECTIVE 10

Leicestershire County Council

Strategic Objective 10:

This would be better as part of a Green Infrastructure Strategy. There should also be reference to the importance of ensuring that protection and enhancement of the Borough's biodiversity is considered in the context of wider county, regional and national priorities and natural resources.

Considered and agreed in part: Strategic objectives are specific components of the Core Strategy as outlined in PPS12. They are the link between the vision and the detailed strategy. Regional Plan Policy 28, Regional Priorities for Environmental and Green Infrastructure advocates the development of Green Infrastructure Plans through LDFs. Therefore it is not intended to remove strategic objective 10 from the Core Strategy but new Spatial Objective 12 will be renamed to refer to Green Infrastructure to in order to provide the a basis for a Green Infrastructure Strategy and comply with the RSS

ACTION REQUIRED

STRATEGIC OBJECTIVE 11

Leicestershire County Council

Strategic Objective 11

The components of this policy should include a reference to it being part of an over-arching GI Policy.

Considered and agreed in part: Strategic objectives are specific components of the Core Strategy as outlined in PPS12. They are the link between the vision and the detailed strategy. Regional Plan Policy 28, Regional Priorities for Environmental and Green Infrastructure advocates the development of Green Infrastructure Plans through LDFs. Therefore it is not intended to remove strategic objective 11

from the Core Strategy but new Spatial Objective 13 will refer to Green Infrastructure in order to provide the a basis for a Green Infrastructure Strategy and comply with the RSS

ACTION REQUIRED

Considered and agreed: Revised strategic objective 11 appears to advocate the safeguarding of open spaces only for sport and recreation which was not the intention. The strategic objective will be amended to clarify this and also highlight the wider benefits of the Borough's open spaces. However, the spatial objectives must be locally specific and direct reference to sport and recreation does reflect the predominant use of the Borough's Green Wedges. This wording will therefore remain in new Spatial Objective 13 however reference will also be made to the role that such assets play in enhancing the value of people's leisure time. New Spatial Objective 12 will deal with the nature conservation value of the Borough's Green Infrastructure, including flood plains.

ACTION REQUIRED

The National Trust

Strategic Objective 11

SO11 – The National Trust objects to the wording that has been added to this Objective, i.e. *...for sport and other forms of recreation*. It is agreed that these are two important considerations, but open spaces are valuable for a much wider range of reasons. For example, access to open spaces is important for a variety of mental and physical health benefits, they are important for (and can be improved in terms of their) nature conservation value, they are often important for the management of flood risk and in some locations are important carbon stores.

It is essential that open spaces are safeguarded for the full range of multi-functional benefits that they provide, not solely sport or recreation. It is therefore recommended that the words *sport and other forms of recreation* are replaced with *their full range of multi-functional benefits*.

STRATEGIC OBJECTIVE 12

The National Trust

Strategic Objective 12

Considered and noted

SO12 – The amendments made reflect the submissions previously made by the National Trust and accordingly this Objective is now fully supported.

The National Trust

Strategic Objective 12

SO12 (page 91) Figure 5

The inclusion of the specific measures in respect of Conservation Areas is welcomed; however, there are no measures proposed in respect of Listed Buildings. It is

Considered and agreed: A comprehensive Implementation and Monitoring Framework will be included in the Submission draft of the Core Strategy and this will include the measures recommended in relation to listed buildings. New Spatial Objective 14 refers to historically significant

considered that these need to be addressed, especially as many will fall outside Conservation Area boundaries. The number of buildings *at risk* is one potential measure, as is the amount of grant assistance taken up. These measures should be capable of assessment each year as part of the Annual Monitoring Report.

building which includes Listed Buildings as well as Significant Local Buildings in the Borough.

ACTION REQUIRED

STRATEGIC OBJECTIVE 13

NFU East Midlands

Strategic Objective 13

Page 30, SO13. We like this objective but feel the qualification of being *essential to the needs of the local economy* is too restrictive. The Council could prove that no development is absolutely essential for the local economy. We would seek to remove *essential to* and replace by *for*.

Considered and disagree: The strategic objective relates to the 'rural' economy as opposed to 'local' economy as stated in this comment. The Borough is highly urban and therefore does not have an abundance of countryside. To help safeguard what countryside the Borough contains it is necessary to prohibit development unless it can be proved essential to the rural economy.

The National Trust

Strategic Objective 13

SO13 – The change in wording at the start of this Objective is very significant and in the Trusts view requires qualification. If particular development is to be encouraged to meet specific requirements then the reference to *with emphasis on* is inappropriate and unhelpful; i.e. the Objective would more appropriately be worded as follows:

Considered and agreed: the proposed new wording of the strategic objective would be more coherent and has been incorporated into new Spatial Objective 13.

Encourage small scale development in the countryside ~~with emphasis on providing for~~ that provides employment, leisure and residential development essential to the needs of the rural economy.

STRATEGIC OBJECTIVE 14

Environment Agency (Evidence supporting this provided)

Strategic Objective 14

It is felt that Strategic Objective 14 on page 91 should put emphasis towards waste minimisation and sustainable waste management in contributing towards regional, national and global initiatives.

Considered and agreed: although minimizing waste is included, reference to sustainable waste management will be included in the amended strategic objective

English Heritage – East Midlands

Strategic Objective 14

ACTION REQUIRED

Considered and agreed in part: the concerns of this

Region

Whilst we support the inclusion of this objective, we recommend that it should also include reference to townscape character and the historic environment as issues to be addressed through the development process. The European Landscape Convention includes *urban landscapes* in its definition of landscape. While Strategic Objective 12 promotes the understanding and access to the local heritage, which we welcome, it does not appear the issue of sustainable development.

response will be addressed in a revised set of strategic objectives in the submission draft. Reference to townscape character has been made in new Spatial Objective 12.

ACTION REQUIRED

The National Trust

It is therefore proposed that the following change to SO14 is made: *Achieve development that is respectful of the natural and historic environment and landscape and townscape character.*
Strategic Objective 14

Considered and noted: support for Strategic Objective 14

NFU East Midlands

SO14 – The change to include reference to landscape character was needed and accordingly is supported. (The related change to **paragraph 2.28 fourth bullet point** is also welcomed.)
Strategic Objective 14

Considered and disagree: the strategic objectives are not a policy and therefore the aims included are not criteria

SO14. No development can meet all of these criteria. The criteria must be separated by ors.

KEY DIAGRAM

Wheatcroft & Son Ltd + J S Bloor (Measham) Ltd (Agent is SSR Planning) (Evidence supporting this allocation option provided)

Key Diagram – Option C:

Comments relate to promotion of a specific site.

Option C
We consider that the land at Cottage Farm, Oadby, as shown as Option C on the Key Diagram, is the most suitable site for a Sustainable Urban Extension/Option for Growth within the Borough of Oadby and Wigston.

The option of allocating a large urban fringe site would provide a basis to allow mixed use development potentially including facilities that will be utilised by the local community. Such an approach is favoured by the Government and it is considered that the site at Cottage Farm, Oadby has numerous advantages

over other similar sized sites and is a suitable location for such an allocation.

This is supported by a number of technical reports previously submitted to the Council emphasising the sites sustainability due to its location in relation to local services and existing infrastructure. The supporting technical reports also confirm that there are no physical or environmental constraints to the development of the site that cannot be addressed through acceptable mitigation measures. The site at Cottage Farm is considered to represent the most appropriate area for mixed use development.

Below is a summary of the aforementioned technical reports:

Masterplan – Current features in and around the site have been considered. Open Space is preserved adjacent to Coombe Park and fronting the A6 to reduce visual impact. Open Space to the south-east of the site also remains in order to preserve the potential wildlife habitat that exists within the ponds and copses. Pedestrian routes and emergency access has been incorporated into the Masterplan. Land for Business Use will be designated to the Eastern side of the site, which is within a convenient walking distance to the rest of the site.

Transport – The site is accessible to local day to day services and it is close to a frequent bus service, such that non car access is a genuine alternative. A sustainability analysis indicates that the site is within walking distance of facilities such as Convenience Stores, Schools and a Doctor's Surgery. The site can be readily accessible by non-car modes and shortened pedestrian links are achievable. Vehicular access to the site is considered, and a solution will favour easy public transport access and will not interrupt the natural flow of traffic along Glen Road.

Archaeology – The Geophysical survey conducted on site concluded that there is little evidence of archaeological activity.

Ecology – No statutory nature conservation designations pertain to the site. The habitats within the site appear to be of low nature conservation importance. Consideration should be given to retaining, wherever possible, the hedgerows, mature trees and ponds within the landscape structure of any proposed development.

Drainage – The site lies within Flood Zone 1 according to the Environment Agency Standing Advice. This indicates that there is little or no flood risk within the area and there is an annual probability of flooding of 1 in 1000 years or greater from either river sources or from the sea. Surface Water can be attenuated on site to limit the run-off to current Greenfield rates to accord with Environment Agency requirements.

Landscape – The site is currently well contained by existing vegetation to the golf course and Mere Lane boundary. A mixed use development will not significantly increase the visual influence of Oadby on the surrounding countryside. The site is considered to be well curtailed by existing vegetation; therefore it would be logical to consider development within the site. The development will have no urbanising influence on the Districts Green Wedge designation some distance to the west of the site.

In considering this, it can be noted that the site at Cottage Farm, Oadby meets, or exceeds key sustainability criteria. The features of the site which help it meet these criteria include:

The site is the only site that can offer a direct access to the A6 and, therefore, access to the public transport and cycle corridor. The site's transportation linkages are also emphasised in the Transport Overview compiled on the site;

Existing Infrastructure currently has the capacity to be able to absorb additional development on the site and will be incorporated into the development;

The site is in a sustainable location and is well related to existing residential development. Development of the site will fill a void between Glen Gorse golf course to the north and open space to the south, and will utilise these facilities and enhance pedestrian linkages for the residents of Oadby to open countryside;

The site is large enough to incorporate mixed use development, with an area of employment use entirely compatible with new residential development, of different types and tenures, as well as the existing adjoining community.

The site is readily available for development and is capable of early delivery due to its lack of physical and environmental constraints.

In conclusion, the site at Cottage Farm will represent the most appropriate and deliverable area for mixed use development. We therefore request that the Submission Core Strategy for the Borough of Oadby and Wigston identifies the site at Cottage Farm, Oadby as a Sustainable Urban Extension/Option for Growth.

Harborough District Council

Key Diagram:

Pennbury appears on the Key Diagram in the shape of a small circle extending into the District of Harborough. The Eco-town proposal is the most significant development proposal facing Oadby and Wigston Borough and Harborough District. The diagram is not nearly representative of the potential scale of the proposal and should be enlarged considerably to make clear the current extent of the possible proposal.

Leicestershire County Council

Key Diagram

Disagree. Although, it is acknowledged that Pennbury is a significant issue, the Key diagram is merely illustrative and is not too scale.

Agreed. The Key Diagram should illustrate SSSIs.

University of Leicester (Agent is Turley Associates)

The Key Diagram should show Sites of Special Scientific Interest.

Key Diagram – Broad Location for Development – Area E

In previous comments made on the Core Strategy Supplementary Consultation, the University supported Area E as an appropriate location for growth. The University welcomes the continued promotion of Area E as illustrated on the Key Diagram, as an appropriate broad location for development due to its proximity to existing facilities, services and public transport at Oadby Town Centre. University facilities are also located close by providing job opportunities and access to leisure and community facilities. The University consider that Area E is a sustainable location which offers opportunities to link and improve existing provision.

East Midlands Regional Assembly

Key Diagram – new development

In Paragraph 3.11 of your document it is stated that the Secretary of State Proposed Changes confirm your Councils preferred approach of using existing Brownfield sites and one large urban fringe site (our underlining). It is recognised that only a moderate amount of development is proposed in the Borough up to 2026, therefore, subject to the contribution of Brownfield sites, the large urban extension may be relatively small scale in comparison with other proposed urban extensions elsewhere around the Leicester PUA. However, Paragraph 4.2.28 of the Proposed Changes July 2008 document continues to refer to the fact that the best opportunities to meet the bulk of the additional provision for the Principal Urban Area lie west of Leicester in Blaby and north in Charnwood. The Secretary of State Proposed Changes include insertion of a sentence in Paragraph 4.2.29 of the Proposed Changes July 2008 document which states that *...a number of factors make the prospect of planned sustainable urban extensions to the (Leicester) Principal Urban Area inOadby and Wigston difficult without sustained and significant transport infrastructure investment.* It may be that alternatives to

ACTION REQUIRED

Considered and noted support for broad location E

Disagreed. From previous consultation and a substantial evidence base, including Assessment of Highways and Traffic Implications, one large urban fringe site is the most sustainable and viable way forward for the Borough Council to provide 2250 units by 2026.

East Midlands Regional Assembly

one larger urban extension will need to be reconsidered in the light of the assessment of highways and traffic implications referred to in Paragraph 3.13 of your document.

Key Diagram – Broad location for new development

It is noted from your key diagram that Option E for a broad location for a large urban extension is within an identified Green Wedge. The Sustainability Appraisal acknowledges that this may have an adverse impact on the landscape. The effects of development in this location would clearly therefore need to be considered in terms of the purpose of the Green Wedge. You will have noted that the Secretary of State is proposing to delete Three Cities Sub-Regional Strategy Policy 3 (Green Wedges), but Paragraph 4.2.18 of the Draft Regional Spatial Strategy still refers to them, including the addition of a Proposed Change which states that a review of existing Green Wedges or the creation of new ones in association with development will be carried out through the Local Development Framework process.

Key Diagram

As indicated in our letter of 1 August 2007, of the broad locations for development, Sites B and C have least impact on designated historic assets. Further assessment of these sites is required to ascertain the importance of any undesignated archaeology (County Historic Environment Record) and the sensitivity of the landscape using the County Historic Landscape Characterisation.

Considered and noted: no support for broad location E. The final decision as to the most sustainable broad location is in the process of being determined. The respondents comments will help inform this.

English Heritage – East Midlands Region

Considered and noted

POLICY THEME 1 – ACHIEVING SUSTAINABLE DEVELOPMENT Page 36

Highways Agency

Policy Theme One;

The development of previously developed land is an approach supported by the agency in principle, to secure sustainable growth within the Borough. However, the redevelopment of Brownfield sites does not in itself ensure that such development is sustainable. The identification of Kilby Bridge is of concern in this regard, as whilst it may involve the reuse of such land, the

Kilby Bridge (and all other locations with potential for development) has been assessed through the Assessment of Highways and Transportation Implications.

A key principle behind the development of an Area Action Plan for Kilby Bridge will be to ensure that any new development is consistent with the size of

Highways Agency

availability of public transport provision and proximity to jobs and services raises issues about the potential reliance on the private car. As such where Brownfield sites are identified to be taken forward within the strategy, they should be accompanied by a detailed assessment of their accessibility by sustainable modes of travel as realistic alternatives to the car.

Policy Theme One;

It is noted that a strategic urban extension may be required within the Borough. I am pleased that the agency is engaged with the transport assessment work that is currently underway to inform the development options of the Borough, together with Harborough District. However, the lack of detail in the Key Diagram for the three sites identified is of concern, including the scale and housing anticipated to be accommodated in each location. At this stage, the agency is not in a position to comment on a preferred location for the growth at this stage pending the outcome of the assessment work. The results of this Further Consultation must be considered in the context of the conclusions of that transport assessment work.

Policy Theme One

Location of Development:
Paragraphs 3.9 to 3.13

The preferred approach to the location of development, including one large urban fringe site, is broadly supported. However, in suggesting that only a small urban extension may be required, the strategy does not appear to present a long term strategy for growth which is sufficiently flexible to respond to increased housing requirements that may emerge through the Regional Plan. The Secretary of States Proposed Changes to the Regional Plan confirm that the housing requirements are minima and should not be regarded as ceilings. A review of the Regional Plan has also commenced to look at how increased levels of housing provision can be accommodated in the region.

David Wilson Estates
(Agent is
Pegasus Planning Group)

the settlement and its associated infrastructure.

No Change.

The potential directions for growth have been taken into account through the Assessment of Highways and Transportation Implications. Consider showing amount of development to be directed to an urban extension on the key diagram.

Change required - Consider showing amount of development to be directed to an urban extension on the key diagram.

The amount of development to be directed towards a sustainable urban allocation will be shown within the Core Strategy

Identification of one direction for growth is considered to be the most sustainable approach towards the location of development in the Borough. Acknowledgement that the RSS housing allocation is a minima and that the Core Strategy should consider growth beyond the plan period will be taken into account when selecting a single direction for growth.

No Change.

David Wilson Estates
(Agent is
Pegasus Planning Group)

It is important that the Core Strategy presents a robust strategy for further long term growth in the Borough. This needs to take account of the increased housing requirements likely to arise through the review of the Regional Plan. The urban focussed strategy, directing development to the main urban areas including Leicester, is likely to mean that some of this additional requirement will need to be accommodated in Oadby and Wigston. Planning Policy Statement 12 paragraph 4.14 requires local planning authorities to take a long term view in preparing their core strategies to ensure that they are sufficiently flexible to take account of changes to the regional planning context without the need for frequent updating. Whilst a large proportion of the development required to 2026 is likely to be accommodated on previously developed sites, the Core Strategy needs to look ahead and consider how future requirements can be accommodated. There will be a need for an urban extension to meet current Regional Plan requirements and provide for future growth needs. This approach would provide the necessary provides the flexibility to respond to any shortfalls in provision on previously developed sites.

Noted.

David Wilson Estates
(Agent is
Pegasus Planning Group)

The Housing Land Availability Assessment for the Leicester Principal Urban Area undertaken by Roger Tym and Partners for the Regional Plan identified the potential for further urban extensions to the Principal Urban Area to the south west of Wigston.

The Core Strategy recognises the need to bring forward an urban extension alongside Brownfield sites to meet strategic housing requirements. The Key Diagram identifies three broad areas of search for potential urban extensions, including land west of Welford Road. The inclusion of this site as an area of search is supported. On behalf of David Wilson Estates we

Agreed. Refer to settlement hierarchy in supporting text to Core Strategy Policy 1. Refer to the differing role of Oadby, Wigston and South Wigston in the Spatial Portrait and the supporting text to Core Strategy Policy 1.

Change Required - Refer to the differing role of Oadby, Wigston and South Wigston in the Spatial Portrait and the supporting text to Core Strategy Policy 1.

have submitted a response to the Strategic Housing Land Availability Assessment outlining the potential for a sustainable development solution on this land. The site is well related to the existing urban area and would not impinge on existing strategically important areas of open land. Development would be well located in relation to existing services and facilities available in Wigston Town Centre. The proposed development is of a sufficient scale to also provide additional local services and facilities to help meet the needs of existing and future residents.

David Wilson Estates
(Agent is
Pegasus Planning Group)

The site has the potential to accommodate some 2,500 homes as part of a mixed use development option. This would provide a sustainable solution for future growth in the Borough, providing affordable homes to meet identified needs. The proposals would be designed and built in accordance with relevant energy efficiency requirements. The proposal also offers the flexibility to provide for a more limited scale of development if required, with the potential for around 450 homes off Welford Road and 150 homes off Newton Lane.

There is reference at paragraph 3.9 to a settlement hierarchy to manage the scale of development in different locations, although this hierarchy does not appear to have been explicitly developed in the proposed policies. Notwithstanding the concentrated nature of the Borough, it is important that the strategy acknowledges the differing roles of Oadby, Wigston and South Wigston in terms of the availability of shopping and community services and facilities and reflects these differences in a settlement hierarchy which can inform decision on the most sustainable locations for further growth.

Issues of Soundness or Legal Compliance: As currently framed, the strategy is likely to fail the test of effectiveness as it does not provide sufficient flexibility to deal with changed circumstances,

Agreed. Refer to settlement hierarchy in supporting text to Core Strategy Policy 1. Refer to the differing role of Oadby, Wigston and South Wigston in the Spatial Portrait and the supporting text to Core Strategy Policy 1.

Change Required - Refer to the differing role of Oadby, Wigston and South Wigston in the Spatial Portrait and the supporting text to Core Strategy Policy 1.

particularly in relation to the scale of future housing requirements. It fails to recognise that the housing requirements set out by the Secretary of State in the Proposed Changes to the Regional Plan are minima and should not be regarded as a ceiling. The strategy is also insufficiently justified as it does not represent the most appropriate strategy given the reasonable alternatives. It represents a short term solution for growth that does not present a clear longer term strategy for growth. The most appropriate sustainable strategy involves the allocation of a sustainable urban extension which provides the flexibility to respond to increased housing requirements likely to arise from the review of the Regional Plan.

Change Required:

Amend strategy to set out a long term strategy for growth in the Borough which is sufficiently flexible to deal with changes to the Regional Plan housing requirements. This will need to include the provision of an urban extension to meet future housing requirements. The most appropriate strategy involves the allocation of land to the south east of Wigston (location B).

The National Trust

Policy Theme 1: Para 3.2 – National Level

Agreed.

J H Hallam & Son Ltd (Agent
Marrons)

The documents listed here should now include a specific reference to the Supplement to Planning Policy Statement 1 on Climate Change considerations.

**Achieving Sustainable Development (Policy Theme 1)
(Page 36)**

Change required – refer to the Supplement to Planning Policy Statement 1 on Climate Change considerations in the Policy Context section

Agreed. Policy Core Strategy 1 achieves this approach.

The preferred approach concerning the use of existing brown field sites is supported. As set out in our representation above the consideration of such sites for the delivery of housing to meet planned requirements for the Borough to 2026 should embrace brown field sites within and adjoining both the existing planned limits to development of the Borough and Oadby,

No change

Wigston and South Wigston Town Centres. This would accord with national and regional policy objectives promoting sustainable development.

CORE STRATEGY POLICY 1

Leicester City Council

Core Strategy Policy 1

The sequential approach to the location of new development as set out in CS1, focusing on the urban areas of the district, is supported.

Support noted.

Natural England

Core Strategy Policy 1

CS1 - The direction of development in appropriate areas contributes significantly to the policy having a robust suite of environmental policies. However, serious consideration should be given to developing of one policy in this group showing that Brownfield sites might also require significant protection from development pressures.

No change.

At a strategic level, the same environmental policies will relate to both greenfield and brownfield sites. The Allocations DPD will deal with any specific environmental considerations relating to specific sites.

No Change.

Wheatcroft & Son Ltd + J S Bloor (Measham) Ltd (Agent is SSR Planning) (Evidence supporting this allocation option provided)

Core Strategy Policy 1

CS1

We support the recognition that Greenfield land as well as Brownfield land is needed in order to meet Oadby and Wigston's housing requirements and we consider that one urban extension, would meet the objective.

Support noted.

Wheatcroft & Son Ltd + J S Bloor (Measham) Ltd (Agent is SSR Planning) (Evidence supporting this allocation option provided)

Urban extensions could help provide new mixed use community areas without detracting from the character of Oadby. They would have a lower requirement for large infrastructure provision that could take some time to come forward and would therefore be able to deliver housing quickly within the plan period ensuring a five year housing land supply. Medium size sites would also ensure that more of the new development was located closer to existing services, improving access. We therefore consider that

Identification of one direction for growth is considered to be the most sustainable approach towards the location of development in the Borough.

No Change.

one medium-sized site Sustainable Urban Extensions would be more appropriate.

This approach of two sustainable urban extensions accords with Government guidance set out in Planning Policy Statement 3 in regard to achieving a mix of housing types and tenures while offering a choice of locations. Land at Cottage Farm, Oadby is ideally located for one of these sustainable urban extensions and it has expansion potential, should it be required at a future date.

Wheatcroft & Son Ltd + J S Bloor (Measham) Ltd (Agent is SSR Planning) (Evidence supporting this allocation option provided)

With regard to the sequential approach set out in Policy 1 whilst we support, as previously stated, the use of Brownfield land as the most sustainable option there are unlikely to be sufficient sites within the Borough, without seriously reducing the existing employment base to meet the housing requirements as set out in the Regional Spatial Strategy despite this figure being quite moderate. The development of Sustainable Urban Extensions will help preserve the suburban quality of the area while safeguarding potential employment land within the urban areas ensuring a mixed use community is maintained. Creating these Sustainable Urban Extensions will also prevent the over-intensification of the urban area of Leicestershire which, if it were allowed to happen, would detract from the high quality townscape of Oadby and Wigston and their neighbouring settlements.

Noted. This is reflected in Core Strategy Policy 1.

No Change.

Wheatcroft & Son Ltd + J S Bloor (Measham) Ltd (Agent is SSR Planning) (Evidence supporting this allocation option provided)

Due to the benefits of creating sustainable urban extensions we consider that this should be noted within the sequential approach and be designated as a separate category to *Greenfield land adjoining the Principal Urban Area*. This separate category should be higher up the sequential approach at number four between *Suitable previously developed land and/or buildings outside the Town Centre of Oadby, Wigston and South Wigston but within the Principal Urban Area that would not have a detrimental impact on the open countryside or*

The New Spatial Strategy for Development in the Borough of Oadby and Wigston policy resolves this issue with a different approach towards setting out the Borough Council's strategy regarding the location of development.

David Wilson Estates
(Agent is
Pegasus Planning Group)

green wedges.

Change Required.

Consideration of two medium Sustainable Urban Extensions and the creation of separate category in the Sequential Test for the Sustainable Urban Extensions.

Core Strategy Policy 1 (CS1): Sequential Approach

The proposed policy presents an overly simplistic approach to the location of development that is inconsistent with guidance in PPS3 and the soon to be adopted Regional Plan. PPS3 no longer includes the sequential test as previously contained in PPG3. Whilst the re-use of previously developed land should be the priority, the PPS emphasises the need for housing development in suitable locations with a good range of facilities and good access to key services and infrastructure. It indicates that options for accommodating housing growth may include re-use of vacant and derelict sites, redevelopment and re-design of existing areas, urban extensions and new freestanding settlements. A portfolio of previously developed and Greenfield sites may offer the most sustainable solution to securing the delivery of future housing requirements in the Borough.

Previously developed sites may not always represent the most sustainable solution for growth. Urban extensions may be well located in relation to existing services and facilities and provide opportunities to provide additional facilities to meet the needs of existing and future residents.

This portfolio solution is reflected in the preferred approach to the location of development involving the use of previously developed sites and one large urban fringe site as the most sustainable solution for the Borough.

Issues of Soundness or Legal Compliance: The proposed policy as drafted fails the test of conformity with national policy as it

Agreed: Core Policy 1 will be revised to better reflect PPS3 and the Regional Plan. The Policy will be amended to set out the preferred approach to the location of development involving a combination of previously developed sites and a large urban extension as the most sustainable solution to meet future housing requirements in the Borough.

ACTION REQUIRED

seeks to apply a sequential test which no longer forms part of Planning Policy Statement 3. Whilst the Planning Policy Statement prioritises the use of previously developed land, it recognises that a range of locations may offer a sustainable solution to accommodate future housing requirements.

Change Required: The Policy should be amended to set out the preferred approach to the location of development involving a combination of previously developed sites and a large urban extension as the most sustainable solution to meet future housing requirements in the Borough.

Core Strategy Policy 1 (CS1)

The amount and type of development needs to be known, as should the capacity of the town centres and suburbs. It should therefore be possible to state the amount of development that is expected in each of these spatial units, and the location and scale of any major Greenfield sites needed. Consequently, a spatial approach should not be needed.

Core Strategy Policy 1 (CS1)

The sequential approach selected is in principle supported. However, no comment is provided regarding the '800 metre rule' set out in Supplementary Planning Guidance, Managing the Supply of New Housing Land. The Annual Monitoring Report (AMR) December 2008 indicates that the 800 metre rule is intended to be retained (at least in the interim).

Given the anticipated need for urban extensions beyond the identified limits to development, it appears inappropriate to retain the 800 metre rule, as sites within the limits to development should by definition have greater sustainability than countryside locations. Application of the 800 metre rule for sites within the limits to development and then allocating urban extensions does not utilise the existing previously developed and most suitable sites to their maximum potential. It would

Government Office for the East
Midlands (GOEM)

Mr T Walker (Agent is Landmark
Planning Ltd)

Agreed, the amount of development that is expected in each of the spatial units, and the location and scale of any major Greenfield sites needed will be set out in the supporting text to Core Strategy Policy 1

ACTION REQUIRED

Support noted.

The '800 metre rule' stems from Managing the Supply of Housing Land SPG related to the adopted Local Plan and is not a consideration in the context of the Core Strategy.

No Change.

therefore contradict Core Strategy Policy 16 as well as introduce inconsistency to the determination of applications.

A consistent approach needs to be developed in order to create a coherent and sound document / planning basis, as the 800 metre rule is not necessarily defensible if urban extensions are proposed.

Proposed Core Strategy Policy 1 (Policy CS 1) (Page 39)

The sequential criteria shown as bullet points within proposed Policy CS 1 should add the words *or adjoining* after *within* in bullet points 1, 2, 3. As such criterion 5 is superfluous and may be deleted.

These representations would require consequential amendments to Strategic Objective 2 (see paragraph 3.3 above)

Disagree. Land adjoining in the context of bullet points 1 and 2 fall within bullet point 3. Land adjoining in the context of bullet point 3 may, if appropriate, fall within bullet point 4. The New Spatial Strategy for Development in the Borough of Oadby and Wigston policy resolves this issue with a different approach towards setting out the Borough Council's strategy regarding the location of development.

J H Hallam & Son Ltd (Agent is Marrons)

Sainsburys Supermarkets Ltd (Agent is Indigo Planning Limited)

Core Strategy Policy 1

Sainsburys Supermarket Limited broadly support the principle of this policy. The draft policy reflects national guidance as established in Planning Policy Statement 1, Planning Policy Statement 3 and Planning Policy Statement 6, however it is recommended that the hierarchy of locations set out in the policy should be revised to include and to reflect the hierarchy set out in paragraphs 2.38 to 2.43 of the Core Strategy. Sainsburys Supermarket Limited therefore recommend that an additional tier be inserted after bullet point two which would promote development in the district, neighbourhood and local centres, before development outside of the town centres of Oadby and Wigston is considered.

Planning Policy Statement 6 sequential test criteria states that town centres should be the first choice for the location for new

No Change

Agreed in part: the retail hierarchy for shopping areas within the Borough is to be revisited and therefore any change is likely to have an effect on the content of Core Policy 1. The New Spatial Strategy for Development in the Borough of Oadby and Wigston policy deals with strategic development locations. Whilst the policy does not disregard local and neighbourhood centres they are not considered significant enough to warrant specific reference in this policy.

ACTION REQUIRED

town development. Policy CS1 should not disregard the local and neighbourhood centres listed in the hierarchy and where development is of an appropriate scale, development in the smaller centres should be considered before out of centre locations.

East Midlands Regional Assembly

Core Strategy Policy 1

Noted.

Achieving Sustainable Development (Policy Theme 1) – Potential Core Strategy Policy 1 strikes strong accord with the theme of urban concentration and the sequential approach to development form contained in the Draft Regional Spatial Strategy. However, you may be aware that in relation to the Secretary of States Proposed Changes the Assembly has stated that Policy 2 of the Draft Regional Spatial Strategy September 2006 should be retained in the Plan as a useful tool to use in assessing the suitability of locations for proposed development.

No Change

The National Trust

Core Strategy Policy 1

The overall sequential approach adopted here generally accords with the previous submissions made by the National Trust, including in response to the supplemental consultation in July 2007.

Disagree. Policies in the Core Strategy should be concerned with delivering the spatial vision and objectives. The issues that it is suggested should be reintroduced into policy are not delivery related.

Therefore, these issues are all rightly dealt with and covered in the Strategic Objectives section.

However, the amalgamation of previous draft Policies CS1 and CS2 has in practice resulted in the removal of much of the policy content relating to achieving sustainable development. The inclusion of this in a headline policy was a significant strength of the earlier proposed Core Strategy and it is considered that the reference to the following matters should be re-introduced:

No Change

(Bullet) the Boroughs assessed accommodation, economic and social needs;

(Bullet) protection and enhancement of the built and natural environment;

(Bullet) accessibility and the minimisation of energy consumption;
(Bullet) waste generation; and
(Bullet) the need to travel

These elements, especially the final four, are essential to ensuring that sustainable development is pursued in accordance with the statutory requirement in the 2004 Act.

POLICY THEME TWO – TOWN CENTRES AND REGENERATION

Highways Agency

Policy Theme Two;

Support for the Area Action Plans and the policy to strengthen their roles is noted.

The agency welcomes the proposed development of Area Action Plans for each of the town centres within the Borough to help strengthen their role and attraction. This will help reduce the need for residents to travel further a field to meet their retail needs and access specific services, and as the most accessible locations within the Borough, form the basis for the sustainable growth of Oadby and Wigston as a whole.

NO ACTION

Highways Agency

Policy Theme Two:

Attention should be paid to the provision of additional car parking in these centres in developing their role. Whilst it is stated that additional underground car parking may be considered, this may lead to increased congestion in and around the centres themselves. Efforts to improve the towns accessibility should instead be focussed upon increasing pedestrian priority in the town centres themselves and in the provision of new or upgraded public transport and cycling links to them.

Agree in part. We have not specified the nature by which we shall be delivering additional car parking within our town centres in this document. However, it will be essential for us to provide adequate parking provision to accommodate the forecasted growth that will be focussed in these areas over the plan period and beyond. We will also look to encourage more sustainable modes of transport and movement in and around the Borough's town centres through this document, as well as through other evidence base work which shall contribute towards the soundness of our Core Strategy and Local Development Framework as a whole.

Leicestershire County Council

Policy Theme 2: Paragraph 4.18

ACTION REQUIRED

The consultation responses that *Green Infrastructure should be*

Agree: The submission draft of the Core Strategy will address the concerns of this respondent.

East Midlands Regional Assembly	<p><i>incorporated as an important consideration in regeneration schemes should be included here.</i></p> <p>Policy Theme 2 – Town Centres and Regeneration</p>	<p>ACTION REQUIRED</p> <p>Support for the general approach to developing our town centres is noted.</p>
David Wilson Estates (Agent is Pegasus Planning Group)	<p>The approach to development of the three town centres is supported in terms of the general approach to development form set out in the Draft Regional Spatial Strategy, and Policy 22 (Regional Priorities for Town Centres and Retail Development).</p> <p>Policy Theme Two Town Centres and Regeneration</p> <p>This section of the Core Strategy outlines the Councils approach to the regeneration of Oadby, Wigston and South Wigston Town centres. These strategies are developed in more detail in the Town Centre Masterplans. The Masterplan proposals present ambitious plans for the regeneration of these centres. The Core Strategy should recognise the important role that appropriately located urban extensions can play in supporting these plans. An urban extension west of Welford Road would be well located in relation to Wigston Town Centre, and additional housing provision in this location could help to support regeneration initiatives by increasing the population within the catchment area of the centre.</p>	<p>NO ACTION</p> <p>Agreed in part. With regards to the support that additional development could provide to the regeneration of Wigston town centre, we agree with this statement. In relation to the suggestion that an urban extension to the west of Welford Road would be well located in relation to Wigston town centre, we note this and will consider all evidence submitted when considering all of the broad locations for development as part of the submission draft document.</p> <p>ACTION REQUIRED</p>

CORE STRATEGY POLICY 2

Leicestershire County Council	<p>Core Strategy Policy 2</p> <p>The Policy should include a reference to GI, to cover both new and existing development.</p>	<p>Disagree with the suggestion that Green Infrastructure should be included at Core Strategy Policy 2 but agree that Green Infrastructure should cover both new and existing development. Green Infrastructure is a very important consideration for the Council and therefore, we intend to fully explain our approach to Green Infrastructure in Core Strategy Policy 9. Core Strategy Policy 3 also takes Green Infrastructure into account.</p>
Government Office for the East Midlands (GOEM)	<p>Core Strategy Policy 2 (CS2)</p>	<p>No action Considered and agreed. Hierarchy of the town centres will be reviewed in the submission draft.</p>

J H Hallam & Son Ltd (Agent is Marrons)

The different characteristics, needs and potential of the three very different town centres are not identified. Neither are the development outputs sought from any subsequent Area Action Plans. Consequently, these policies do not provide a strategic context for such Area Action Plans.

Proposed Core Strategy Policy 2 (Policy CS2) (Page 44)

The consideration of new development within the objectives to proposed Policy CS 2 should enable suitable previously developed sites within *or adjoining* town centres to be considered for potential development and the wording of the proposed Policy should be modified accordingly.

ACTION REQUIRED

Agreed in part: the Borough's Town, district, local and neighbourhood centres have defined boundaries to ensure appropriate development/redevelopment takes place within these areas. However, in line with PPS6 paragraph 2.5 it is important to plan for the growth of identified centres if evidence supports this. Therefore the policy needs to ensure that future growth can be accommodated either within defined centres or through the extension of if this is evidenced.

Sainsburys Supermarket Ltd (Agent is Indigo Planning Limited)

Core Strategy Policy 2:

Sainsburys Supermarket Limited support the principle of this draft policy and acknowledge the role of the retail hierarchy. The policy establishes that the main development be carried out in the main centres, but also states that provision will be made for local services and community facilities within neighbourhood and local centres. It is however recommended that the last paragraph of this policy be reworded to state:

Provision will be made for new and enhanced local services.

This is in order to strengthen any existing facilities, such as the Sainsburys store and facilities at Glen Road which provides essential everyday local services to the surrounding residential population.

Core Strategy Policy 2 – Hierarchy and Development Strategy for Town, Neighbourhood and Local Centres

ACTION REQUIRED

Support for the approach to the retail hierarchy is noted. Regarding the suggestion to change the last paragraphs wording, it is the Councils objective to focus new development as much as possible within our town centres and to strengthen the existing facilities and local services within the neighbourhood and local centres. This is in line with the recommendations that we have been given through the recently published Retail Capacity Study (2008) as well as through Planning Policy Statement 6 (PPS6).

No action

W M Morrison Supermarkets plc (Agent is Peacock and Smith)

Agreed: In line with Planning Policy Guidance 6, the third paragraph of Core Strategy Policy 2 will be revised to address the concerns of this respondent.

Representing Wm Morrison Supermarkets Plc.

ACTION REQUIRED

We refer to the third paragraph of this draft policy which reads as follows:

In considering new development, the Borough Council will assess need and sequentially determine any site selection if development is deemed to be appropriate...

We consider that this policy should reflect National Government policy guidance, provided by Planning Policy Statement 6. The policy should be amended to clarify that for retail schemes which are brought forward within existing designated centres, there is no requirement to demonstrate retail need.

CORE STRATEGY POLICY 3

Environment Agency (Evidence supporting this provided)

Core Strategy Policy 3

Although Core Strategy Policy 3 on page 45 mentions waste minimisation, we do not feel that the emphasis is strong enough and therefore, where there is large scale change, we recommend strengthening the policy (or devising a separate policy) to promote sustainable waste management in line with:

Planning Policy Statement 10 – Sustainable Waste Management: which supports the objective of the National Waste Strategy; and
Regional Waste Strategy for the East Midlands (Policy RWS 1.1, Policy RWS 1.2, Policy 1.3 and Policy RWS 1.4). The Regional Waste Strategy supports Policy 37 of the Draft Regional Plan RSS8 for the East Midlands and Policy 37 of the East Midlands Regional Plan – Proposed Changes July 2008.

These documents should also be included as policy considerations under chapter 4 and 7. As a further point, Strategic Objective 14 is linked to Core Strategy Policy 3 with respect to waste.

Agreed: We feel that by referencing all of the suggested policies at national and regional level, as well as linking Core Strategy Policy 3 to Strategic Objective 14, in order to strengthen reference to the importance of waste management minimization, we can insert the word 'sustainable' in the seventh bullet to meet the regional requirements for large scale schemes.

ACTION REQUIRED

Natural England

Core Strategy Policy 3

It is noted that Green Infrastructure is addressed within **CS3**, but given the scope and capacity for Green Infrastructure to influence this area it should be addressed under a separate policy. Such a policy may be better served in Policy Theme 4. If Green Infrastructure is indeed a priority, then the case for it ideally should be supported by a document within the evidence base.

Agreed in part. We are aware of the importance of promoting the role of Green Infrastructure and therefore intend to address this in Core Strategy Policy 9, Policy Theme 4. It is essential that Core Strategy Policy 9 reflects the fact that Green Infrastructure is a priority in the Borough.

ACTION REQUIRED

Harborough District Council

Core Strategy Policy 3

CS3

It would be helpful if this policy when proposed for submission would identify the broad locations of regeneration schemes or areas of large scale change and therefore where such approaches may be appropriate. Harborough District Council would draw attention to the benefits of joint working on these plans if such proposals are to impact upon the District.

Agreed: In the explanatory text for this policy theme we have stated within paragraph 4.9 that development will be focussed in Oadby, Wigston and South Wigston town centres. Furthermore, a boundary will be drawn around Kilby Bridge. At present our evidence base does not identify any other major regeneration areas/areas of large scale change. However the policy/supporting text should be revisited to make this clearer.

Wherever deemed necessary, it is agreed that joint working is the most effective method for successful implementation of plans. (To be deleted once done – delete last sentence in para 4.9).

ACTION REQUIRED

Government Office for the East Midlands (GOEM)

Core Strategy Policy 3 (CS3)

The different characteristics, needs and potential of the three very different town centres are not identified. Neither are the development outputs sought from any subsequent Area Action Plans. Consequently, these policies do not provide a strategic context for such Area Action Plans.

Agreed in part. The three towns in the Borough should be identified in Core Strategy Policy 3 but their characteristics, needs and potential development outputs which are sought strategically is to an extent covered within paragraphs 4.7 to 4.15

J H Hallam & Son Ltd (Agent is Marrons)

Proposed Core Strategy Policy 3 (Policy CS 3) (page 45)

The objectives of this proposed Policy are broadly supported but

No action

Considered and noted: This will be picked up via the amendments to Core Strategy Policy 1.

English Heritage – East Midlands Region

it is to be noted the earlier representations above concerning proposed Strategic Objective 2 should be read in conjunction with this representation given this policy initiative would be linked to that strategic objective.

Core Strategy Policy 3

An Additional bullet is proposed for this policy: *Take account of local landscape or townscape character in the design of the scheme.*

No action

Agreed. This bullet would be a useful addition and would contribute towards a more robust Core Strategy Policy 3. This bullet will be inserted between the existing 6th and 7th bullet and worded as you suggest

POLICY THEME THREE – TRANSPORT & ACCESSIBILITY

Highways Agency

Policy Theme Three;

Considered and noted.

The preferred approach and rationale of the authority in addressing transportation issues within the Borough as set out in Chapter 5 could be developed further. Key issues, options, and preferred approach seek to encourage more sustainable travel could be set out in a more structured manner. The identification of 'improving access to essential facilities' and 'encourage adoption of green travel plans' as the preferred approach are only two aspects of the package of initiatives which would be required to support sustainable growth and reduce reliance on the car in the Borough.

The rejection of seeking to *reduce congestion* and *reduce road casualty accidents* in terms of the alternative approaches to developing a transport and accessibility policy is not consistent with the wider policy context. These themes are central to the governments shared priorities for transport (website) and as such are reflected in local transport plans and in national guidance.

The Core Strategy has a significant role to play in setting an appropriate policy framework for securing improvements to public transport, walking and cycling provision, road safety, maintenance of infrastructure and air quality. This may be supported by directing development to the most sustainable

Leicestershire County Council	<p>locations, setting out key aspects of the transport strategy and measures for the area, and a policy framework for securing contributions to transport measures from developers.</p> <p>Policy Theme 3: Paragraph 5.10</p> <p>Increasingly, residential travel plans are being sought. The Core Strategy should refer to the need for both residential and non-residential Travel Plans.</p>	<p>Agreed. In the submission draft document, paragraph 5.10 will now read ‘...For new residential or non-residential schemes that may well have significant impacts, the preparation of a travel plan will enable options for promoting sustainable forms of movement to be explored, for example, the promotion of walking, cycling and public transport. The developers will also set in place a process to monitor and adjust such travel plans in order to ensure their scope to achieve maximum impact upon promoting sustainable methods of transport’.</p>
Leicestershire County Council	<p>Policy Theme 3: Transport and Accessibility</p> <p>Alternatives and Reasons for Rejection</p> <p>The meaning of this is unclear. The wording appears to imply that the alternatives of reducing congestion and road casualties, etc. have been rejected. The Core Strategy should make clear reference to and support the Leicestershire Local Transport Plan 2006-2011, which sets out the Highway Authority’s objectives.</p>	<p>ACTION REQUIRED</p> <p>Agreed. We used this title because it was a continuation of the structure used in the Preferred Options Document. However, it doesn’t fit well in the Regulation 25 Document and as a result, the format and structure of the Submission Draft will change considerably so that the reader feels able to read through the document more smoothly</p>
Leicestershire County Council	<p>Paragraph 5.9</p> <p>This should signpost Policy 21 with regard to ‘pooled’ funding.</p>	<p>ACTION REQUIRED</p> <p>Agreed: due to the scale of development that is likely to occur in the Borough over the term of the Core Strategy, funding for infrastructure improvements may be problematic unless multi-agent support is identified. An implementation framework to be included in the submission draft. This will identify those developments that will need to help fund necessary new infrastructure or improvements as identified through the evidence base.</p>

East Midlands Regional Assembly

Transport and Accessibility (Policy Theme 3)

Paragraph 3.4.18 of the Draft Regional Spatial Strategy emphasises the importance of Travel Plans for new development and the need for developers to monitor them.

ACTION REQUIRED

Agreed. In the submission draft document, paragraph 5.10 will now read ‘...For new residential or non-residential schemes that may well have significant impacts, the preparation of a travel plan will enable options for promoting sustainable forms of movement to be explored, for example, the promotion of walking, cycling and public transport. The developers will also set in place a process to monitor and adjust such travel plans in order to ensure their scope to achieve maximum impact upon promoting sustainable methods of transport’.

CORE STRATEGY POLICY 4

Highways Agency

Core Strategy Policy 4

The proposed **CS4**, focussing on the protection of land for future transport schemes, indicates that a key area of transport improvements will be in providing additional highway capacity. The authority could adopt a more sustainable approach to make the best use of existing services and infrastructure in place, encourage walking, cycling and public transport use, before finally, only as a last resort, providing additional highway capacity.

Agreed. Amendments to Core Strategy Policy 4 shall be made so that it encourages sustainable modes of transport as well as more physical development to tackle population growth and highway use over the plan period and beyond

ACTION REQUIRED

Leicestershire County Council

Core Strategy Policy 4

The County Council seeks the continued protection of the Eastern District Distributor Road in Oadby and Wigstons LDF. It would impact on a number of key strategic areas of the LDF and should not be abandoned unless and until the County Council expresses a formal view as Highways Authority.

Considered and noted. We have indicated on the Key Diagram that the Eastern District Distributor Road remains a consideration

Leicestershire County Council

Core Strategy Policy 4

This policy is awkwardly worded. It should refer to documents by title and should include the Local Transport Plan.

Agreed. The Leicestershire Local Transport Plan was included as part of our evidence base at the beginning of the chapter.

Harborough District Council

Core Strategy Policy 4

It would be helpful if the Core Strategy Policy 4 could identify more clearly what might be proposed to help develop and enhance a Sustainable Transport System.

ACTION REQUIRED

Agreed. We will add the following: 'including improved public transport services, cycling routes, as well as signposting and safety for pedestrians throughout our Borough.'

Government Office for the East Midlands (GOEM)

Core Strategy Policy 4 (CS4)

The transport schemes needed are not identified, despite one (proposed Eastern District Distributor Road) being identified on the key diagram.

ACTION REQUIRED

Agreed: the key diagram will be amended to reflect this in the submission draft

ACTION REQUIRED

CORE STRATEGY POLICY 5

Natural England

Core Strategy Policy 5

It is good to see that **CS5** specifically stipulates that green travel plans must be included for developments of a particular size. However, the role that either green wedges or green infrastructure play as a conduit for sustainable travel methods must be highlighted. This will significantly reinforce SO6, which reflects a need for the development of sustainable modes of transport, like cycling and walking.

Agreed in part: Green Wedges and Green Infrastructure will be explained in other policies of the document. It would be more appropriate to include a paragraph in the explanatory text in relation to Green Wedges and Green Infrastructure and how this will play an important role in the development of a sustainable and accessible transport Network in the Borough.

ACTION REQUIRED

Agreed. The final paragraph in Policy 5 will read: Where the residential or non-residential development is considered of a significant size, it will seek to provide a green travel plan, indicating how access to sustainable forms of transport will be incorporated. There will also be a need for developers to undertake a Transport Assessment for proposals that are deemed significant in size

Leicestershire County Council

Core Strategy Policy 5

The wording of the final paragraph is too weak and should be strengthened to require developers to provide residential and non-residential travel plans. It should refer to access to sustainable modes of transport and set out mechanisms for delivery and monitoring of effectiveness.

ACTION REQUIRED

Agreed. The policy will now read: Where the residential or non-residential development is

Highways Agency

Core Strategy Policy 5

CS5 on Sustainable Transport and Accessibility is welcomed. Reference should also be included on the need for developers to undertake Transport Assessments to accompany significant development proposals.

considered of a significant size, it will seek to provide a green travel plan, indicating how access to sustainable forms of transport will be incorporated. There will also be a need for developers to undertake a Transport Assessment for proposals that are deemed significant in size

ACTION REQUIRED

Considered and noted

Wheatcroft and Son Ltd + J S Bloor (Measham) Ltd (Agent is SSR Planning) (Evidence supporting this allocation option provided)

Core Strategy Policy 5

Land at Cottage Farm Oadby (Option C) is ideally located to help the Council achieve its aims, set out in CS5, of ensuring that new development is located so as to reduce the need to travel whilst enhancing the accessibility of public transport. Land at Cottage Farm Oadby is the only site that can offer direct access to the A6 and therefore access to the public transport and cycle corridor that runs along the A6 through Oadby and on to Leicester. The site is also large enough to incorporate mixed use development, with an area of employment use, offering the possibility of employment/services within walking and cycling distance of the surrounding residential area. The provision of a green travel plan for the development would further help to increase sustainable modes of transport and will need to be discussed with the Council at a more detailed stage.

Government Office for the East Midlands (GOEM)

Core Strategy Policy 5 (CS5)

No facilities to support Green Travel Plans are proposed e.g. a centrally administered car share club, park and ride, cycle improvements etc.

Supporting text, Implementation of policy and Local Infrastructure Partnership

POLICY THEME 4 - GREENFIELD LAND, NATURAL ENVIRONMENT AND BIODIVERSITY

East Midlands Regional Assembly

Greenfield Land, Natural Environment and Biodiversity (Policy Theme 4)

See above in relation to Green Wedges (Paragraph 4.2.18 of the Draft Regional Spatial Strategy).

Considered and noted: This has been considered as part of the Strategic Housing Land Area Assessment. This will also be picked up in the Green Infrastructure policy

As referred to in the representations we made at earlier stages of preparation of the core strategy, it is increasingly our experience that previously developed land, and especially land abandoned more than 20 years ago, is often found to contain previously unrecorded species of national importance, particularly invertebrates. It may be appropriate to arrange for the carrying out of ecological assessments before formal designation or approval of plans for development. Such ecological assessments accord with your Community Plan objective of *promoting knowledge and care of environment* and may also help inform or prioritise the revisions to the Green Wedges policy area.

The National Trust

Policy Theme 4

Para 6.14

The National Trusts understanding (and indeed the experience of its properties elsewhere in the East Midlands) is that generally we are already experiencing wetter (and milder) winters and drier (and hotter) summers, together with more extreme weather events (stronger gales, more intense precipitation) compared with previous years. The expectation is not that these events will happen by 2059 but that they will become increasingly noticeable between now and then.

In other words this is not something that might happen; rather it is already happening and is predicted to occur to an increasingly greater extent over the next 50 years.

Leicestershire County Council

Chapter 6: Para 6.8

There should be reference to the Stepping Stones publications *Creating a Green and Prosperous Future: A Green Infrastructure Delivery Plan for the Stepping Stones Project* and its associated action plan and the *Leicester, Leicestershire and Rutland Landscape and Woodland Strategy*. There should also be reference to the IT Power study *Planning for Climate Change May 2008* which was jointly commissioned by the

Disagree. We have based paragraph 6.14 on the *Planning for Climate Change Study (2008)* and also, the paragraph does not dismiss that climate change is taking place, it just states that by 2059, there is a good chance that there will be more rainfall in the winter and less in the summer. However, we are all unsure of exactly how climate change will impact upon the world but we are all agreed that climate change is an issue that is going to continue to have an impact upon the global climate in future years

No change

Agreed. These documents shall be taken into account to support these policies.

ACTION REQUIRED

Leicestershire County Council	<p>Borough Council. Chapter 6: Paragraph 6.9</p> <p>Being a small predominately urban Borough, there should be reference to the inter-relationship with the landscape of neighbouring authorities and the GI links between them.</p>	<p>Agreed. We intend to include information within the explanatory text in relations to the role that Green Infrastructure will play in linking to the landscapes of the neighbouring authorities of Leicester City, Blaby District Council and Harborough District Council</p>
Leicestershire County Council	<p>Chapter 6: Paragraph 6.10</p> <p>The wording on boundary review(s) is confusing.</p>	<p>ACTION REQUIRED Agreed. We shall change the wording to be more concise</p>
Leicestershire County Council	<p>Chapter 6: Paragraph 6.11</p> <p>This should precede para 6.10, since it justifies 6.10. In addition it should be noted that the Green Wedge Management Strategy was jointly prepared by Stepping Stones and the Borough Council.</p>	<p>ACTION REQUIRED Agreed. This will be amended in the Regulation 27 submission draft</p>
Leicestershire Constabulary (Evidence supporting this provided)	<p>Policy Theme 4</p> <p>6.12 moves to provide a checklist on energy change technologies, part of the sustainable design challenge, and I cannot see why something similar might not be included on designing out crime measures. The accompanying Core Strategy Policy 11 relates to major development and energy. Surely all the checks for major development need to be itemised without being too specific and within this designing out crime and providing for new policing infrastructure might be included. In a similar vein I see 6 Core Strategy Policies concerned with maximising green infrastructure or countryside but there is little policy on designing out crime or sustainable design and securing other infrastructure.</p>	<p>ACTION REQUIRED</p> <p>Considered and noted: We will amend where necessary and consider your comments.</p>

CORE STRATEGY POLICY 6

Leicester City Council

Core Strategy Policy 6

Comments noted.

Policy CS6 however refers to the possible review of green

Natural England

wedges in the district. In circumstances where development within green wedges is deemed necessary we would want to work jointly with Oadby and Wigston to ensure that any development close to the boundary would not have an unacceptable impact upon the local area, compromise the aims of the City's emerging Core Strategy or the overall aims of the green wedge.

Core Strategy Policy 6

Natural England supports the inclusion of a specific policy on Green Wedges since with their capacity to offer multiple benefits; green wedges are efficient and cost-effective components of a Green Infrastructure network.

While detailed changes to local boundaries are unlikely to be of direct concern, **CS6** seems to indicate more significant changes are a distinct possibility. By simply focusing only on green wedges' use in maintaining the separate identity of settlements, the policy is immediately discounting much of their value.

This policy needs to be much more robust; there is scope to do this while allowing the necessary development to occur. The inclusion of the condition that new development can go ahead if justified detracts from the policy and significantly weakens it. As it stands now the green wedge policy is not consistent with policy CS1– which advocates a sequential approach, or with policy CS16 which looks at the impact of development. This policy needs to be in sync with these policies and Oadby and Wigstons general vision.

Natural England would also strongly advise that a dedicated Green Infrastructure policy is essential to augment this current Green Wedge policy and further ensure that Strategic Objectives and the Vision to which it relates are safeguarded. A Green Infrastructure policy will be very useful in directly securing the objectives identified the Strategic Objectives 4, 6,8,9,10,11,

Agreed in part. We are well aware of the importance of Green Infrastructure and realise that we currently don't address this in our document. Therefore, we intend to strengthen our policy on Green Infrastructure by realigning Core Strategy Policy 9 to incorporate this. With regards to Core Strategy Policy 6, we do not intend to incorporate Green Infrastructure in this policy. However, we will ensure that it is dealt with in the explanatory text of this chapter and signposted to Core Strategy Policy 9 for the full policy

and 14. A very good example of a green infrastructure policy can be found within the North Northamptonshire Core Spatial Strategy, the core of reads as follows:

A net gain in green infrastructure will be sought through the protection and enhancement of assets and the creation of new multi-functional areas of green space that promote recreation and tourism, public access, green education, biodiversity, water management, the protection and enhancement of the local landscape and mitigation of climate change, along with green economic uses and sustainable land management.

Green Infrastructure corridors will connect locations of natural heritage, green space, biodiversity or other environmental interest. They will be safeguarded through:

- a) Not permitting development that compromises their integrity and therefore that of the overall green infrastructure framework;*
- b) Using developer contributions to facilitate improvements to their quality and robustness;*
- c) Investing in enhancement and restoration where the opportunities exist, and the creation of new resources where necessary.*

Development will contribute towards the establishment, enhancement or ongoing management of a series of local corridors linking with the sub-regional corridors. Priorities for investment will be those areas where net gains in the range of functions can be improved, particularly those that improve access to the urban core and remedy local deficiencies in open space provision and quality.

In addition, a stronger policy position will focus primarily on mitigation rather than compensation with respect to any effects

<p>Wheatcroft & Son Ltd + J S Bloor (Measham) Ltd (Agent is SSR Planning) (Evidence supporting this allocation option provided)</p>	<p>on green wedges. This will bring it into line with Planning Policy Statements 1 and 9.</p> <p>Core Strategy Policy 6</p> <p>We generally support the retention of the Green Wedges within the borough and recognise their importance in preventing the coalescence of settlements and protecting the separate their separate identities.</p>	<p>Comments Noted</p>
<p>Harborough District Council</p>	<p>There are locations for sustainable urban extensions that are not within Green Wedges such as Option C and due to its location development here would not create coalescence between settlements. Therefore, we consider that as there are sustainable urban extensions that do not conflict with Green Wedge designations; that Option E Land adjacent to the urban area north east of Oadby, which is within the ThurnbyLeicesterOadby Green Wedge should be discounted as a suitable option for a sustainable urban extension on the basis there are alternatives.</p> <p>Core Strategy Policy 6</p> <p>The Council would suggest that CS6 should set out the rationale for designating Green Wedges.</p>	<p>Noted</p>
<p>Harborough District Council</p>	<p>Core Strategy Policy 7</p> <p>The supporting text to CS7 (Green Wedge Land uses) might recognise that Green Wedges extend all round the Leicester Principle Urban Area and whilst agreeing in principle with the designation in CS6 and with the list of restricted land uses proposed in CS7, there is a need to ensure a consistent approach to their designation and role across local authority boundaries.</p> <p>The Stoughton, Oadby and Thurnby Green Wedge straddle both</p>	<p>Noted</p>

David Wilson Estates
(Agent is
Pegasus Planning Group)

Oadby and Wigston Borough Council and Harborough District Council. The emerging Regional Spatial Strategy says that the existing Green Wedges should be reviewed as part of the Local Development Framework process. The Council would suggest that at the very least, both Councils adopt a common approach to justification of boundaries in terms of future development and acceptable uses.

It appears that the Borough Council is proposing that one of the Green Wedges be also identified as a potential option (option E), which appears to conflict with the purpose and function of this policy. Some further clarification is required.

Policy Theme 6 Balanced Housing Markets

Para 8.0 and 8.8-8.11

The preferred approach involving the use of previously developed land and one large urban extension is supported. However, the strategy should be more positive in its recognition that an urban extension can play a key role as part of a sustainable development solution for the Borough. Para 8.9 highlights some of the advantages of an urban extension, including access to existing facilities and infrastructure and a good relationship to the existing settlement form. Urban extensions at an appropriate scale can also deliver benefits in the form of new services and facilities of benefit to both existing and future residents.

Para 8.10 indicates that it is intended that the designation of an urban extension will be a matter for the Allocations Development Plan Document. PPS12, paragraph 4.6 makes it clear that core strategies may allocate strategic sites. These are sites considered central to the achievement of the strategy. The PPS indicates that allocation through the core strategy may facilitate the delivery of key sites, particularly where there are long lead in times. The identification of strategic sites is not a matter of the scale of the proposed development but rather about the role the

Comments noted. We are reviewing our strategy regarding broad location for development in the next draft and intend to set out our preferred areas of growth based upon the evidence base that we have gathered as part of this process

site plays in the context of the overall strategy. Whilst the scale of urban extension required to meet housing requirements in the Borough is likely to be less than other sustainable urban extensions proposed elsewhere around the Leicester PUA, it nevertheless plays a key role in the delivery of the strategy for the Borough. As such the Council should consider the specific allocation of an urban extension as a strategic site through the Core Strategy.

Issues of Soundness or Legal Compliance: The strategy is likely to fail the test of effectiveness. A key Government priority is to secure the delivery of additional housing to tackle issues of affordability. There is an over reliance on previously developed land to meet future housing requirements. The strategy recognises a need to bring forward one urban extension but does not propose to allocate a site through the Core Strategy. This approach could frustrate the delivery of new housing to meet future requirements.

Change Required:

Amend Core Strategy to include the allocation of an urban extension as a key component of the development strategy for the Borough. The most appropriate location for an urban extension is to the south east of Wigston (location B). This site should be specifically allocated through the Core Strategy as a key component of the development strategy for the Borough.

Core Strategy Policy 6 (CS6)

Any strategic development location in the Green Wedge should be identified.

Core Strategy Policy 6

The key concepts of Green Infrastructure are connectivity and multi-functionality. With the recognition in this document of Green Infrastructure and its importance in terms of strategic

Government Office for the East
Midlands (GOEM)

Leicestershire County Council

Comment noted.

Agreed in part. We are well aware of the importance of Green Infrastructure and realise that we currently don't address this in our document. Therefore, we intend to strengthen our policy on Green Infrastructure by realigning Core Strategy Policy 9 to

Leicester Racecourse Ltd (Agent is Marrons)

connectivity of green space, it should also be acknowledged that green wedges can already provide many of the functions of Green Infrastructure and that the two should be integrated. It should be recognised that adjustments to green wedge boundaries might affect their functionality. Unlike Green Belt the advantage of green wedges is that they provide fingers of green that can extend right into the urban area benefiting those communities that otherwise would have limited access to large areas of green space. Therefore, the loss of any areas of green wedge is not easily mitigated against for people living closest to the central urban area.

Core Strategy Policy 6

It is considered that Policy CS6 fails to comply with the following soundness tests in PPS12:

1. the document represents the most appropriate strategy considered against the reasonable alternatives.
2. the plan is flexible.

It is considered that the retention of the existing Green Wedges, without reviewing the current boundaries is not the *most appropriate* strategy when considered against the reasonable alternatives. The boundaries of all areas currently delineated as Green Wedge which could be removed from this designation without any impact on the overall objective of the Green Wedge Policy. There are numerous examples of areas that could be removed from the Green Wedge; the area known as the land north of Palmerston Way Oadby is a key example. This is on the basis that this triangle of land (shown edged yellow on the attached plan) is severed from the main Green Wedge area on the southern side of Palmerston Way by the A6 Distributor Road, and because of this physical separation no longer contributes to the historic Green Wedge objectives of separating Oadby and Leicester, on the basis that it too also from Green

incorporate this. With regards to Core Strategy Policy 6, we do not intend to incorporate Green Infrastructure in this policy. However, we will ensure that it is dealt with in the explanatory text of this chapter and signposted to Core Strategy Policy 9 for the full policy

ACTION REQUIRED

Comments noted. Our strategy regarding our approach to the management of our Green Wedges will be considered when submitting the next draft.

Wedge.

There is a requirement for the Borough Council to make provision for the housing employment needs of the Borough of 2026:

(note, they are just referring to policy, its still CS6) (bullet) Policy CS16 of the Core Strategy: Meeting the Housing Needs of the Borough states that *the Borough Council will monitor and manage the release of land in the Borough for the new housing development between 2001 and 2026 and will seek to provide 2250 dwellings to be completed during this time.*

(note, as above just reference, still CS6) (bullet) Policy CS20 of the Core Strategy: Meeting the Employment Needs of the Borough states that *the Borough Council will seek to increase the range of employment opportunities available through the provision of an additional 5800 square metres of office floor space and 1.3 hectares of industrial warehousing land between 2007 and 2026.*

It is evident from what is set out in the bullets above that there is a requirement for the housing and employment needs of the Borough to be met to 2026. The areas of Green Wedge which could be removed following a review of the boundaries, without harm to the overall objectives of the Green Wedge could in principle be utilised for the provision of housing and/or employment land. It appears that policy CS6 by not proposing to review the Green Wedge boundaries is seeking to protect the Green Wedge to the detriment of development needs.

The retention of the Green Wedges in their existing form does not therefore represent *the most appropriate* strategy when considered against the reasonable alternatives, given that there are areas of Green Wedge which could be removed and therefore utilised to meet other development needs, without

undermining the overall objectives of Green Wedge Policy. On this basis, it is concluded that Policy CS6 fails the test of soundness in PPS12 which requires policies to be justified. The policy is therefore deemed to be unsound.

Further, the approach taken to the retention of the Green Wedges does not permit any flexibility to enable changing circumstances to be dealt with, for example, the need to provide for the development needs of the Borough to 2026. As such, it is further concluded that the policy CS6 fails the test of soundness in PPS12 which requires policies to be *flexible* to enable changing circumstances to be dealt with. As such, the policy is not deemed to be *effective*. The policy is therefore deemed to be unsound.

It is noted in the Report of the Panel for the emerging Regional Spatial Strategy for the East Midlands, that the panel conclude at paragraph 14.50, that, *we consider the justification for the retention of existing Green Wedges, as well as for the creation of new ones in association with new development and urban extensions, should be a matter for local development framework core strategies*

As such, the emerging regional policy envisages a review of existing Green Wedges as part of the LDF. Policy CS6 does not propose this, rather it proposes to retain the Green Wedge without any form of review. It can be concluded therefore that policy CS6 fails to be *in conformity* with the Regional Spatial Strategy. As such, it is questionable as to whether the Policy accords with the legal requirements set out in paragraph 4.50 of PPS12.

It is noted that paragraph 6.10 of the Core Strategy states in relation to the Green Wedges.

Boundaries should be reviewed to reflect the location of any

future development that may be required in the vicinity of the existing Green Wedge boundaries

The fact that Policy CS6 does not then reflect this apparent positive and proactive approach of the Council, in that Policy CS6 proposes to retain the existing boundaries, means there is internal inconsistency within this development plan document.

Over all, it can be concluded that Policy CS6 fails to represent the *most appropriate* strategy, and fails to be *flexible* to enable it to deal with changing circumstances and also fails to be internally *consistent* and is not in *general conformity* with regional spatial strategies. As such Policy CS6 fails to be *justified* or *effective* and is not therefore a sound policy.

It is suggested that if the existing green wedge boundaries were proposed to be reviewed under Policy CS6 then this would represent the *most appropriate* strategy, because this would not then represent the protection of the existing green wedge to the detriment of any other form of development coming forward, and therefore represents flexibility within the policy by allowing other uses to potentially come forward and would also ensure internal consistency with paragraph 6.10. The policy should be drafted in a proactive and positive way, stating that the green wedge boundaries will be reviewed. This approach would also ensure conformity with the emerging regional spatial strategy.

The proposed policy should therefore be amended to:

the existing Green wedges at

- 1. Thurnby - Leicester - Oadby*
- 2. Oadby – Leicester – Wigston*

will be reviewed to accommodate the need for new development...

Given that the Council recognise in Paragraph 6.10 of the Strategy that:

Boundaries should be reviewed to reflect the location of any future development that may be required in the vicinity of existing green wedge boundaries

The changes proposed in paragraph 15 above are entirely consistent with the Council's view

English Heritage – East Midlands Region

Core Strategy Policies 6 and 7 – Green Wedges

Here seems to be some contradiction between Strategic Objective 11 and the flexible approach set out in Core Strategy Policy 6 as the preferred option. Core Strategy Policy 7 limits the type of development acceptable within a Green Wedge, yet the inclusion of Option E as the location for a major urban extension suggests that if this option were selected a large area of Green Wedge would be lost. The role of the Green Wedge in this area needs to be determined in line with the purposes set out in Paragraph 6.11, as part of the assessment of suitability of Option E as a development site. In addition to the purposes listed in paragraph 6.11, the protection of historic assets should also be included, together with their potential for recreational use as part of a green infrastructure network for the Borough and the adjacent areas in Harborough District and Leicester City. The Thurnby-Leicester-Oadby Green Wedge includes a scheduled monument (Evington Moated Site within the City) and a small number of listed buildings and the open character of the area contributes to their setting. The Core Strategy needs to provide greater clarity regarding the amount of boundary change that would be considered acceptable.

Comments noted. Our strategy regarding our approach to the management of our Green Wedges will be considered when submitting the next draft.

The National Trust

Core Strategy Policy 6 – Green Wedges

The specific Policy wording is supported; including the clear

Support noted. Our strategy regarding our approach to the management of our Green Wedges will be considered when submitting the next draft.

commitment to retain existing boundaries unless reviewed
through a more detailed Local Development Framework
Document first.
