

# **Matter 6 – Site Allocations and Regeneration Opportunity Areas**

**March 2018**

**Local Plan Examination Matter Statement**



*Oadby and Wigston  
Borough Council*

Issue 1: Whether the allocations are sound?

**Q1. Is the methodology and criteria used to select the most appropriate housing and employment sites robust, such that the selection of sites for inclusion in the LP is justified having regard to the supporting evidence base, in particular the Sustainability Appraisal?**

Council response;

1. Yes. The Council is satisfied that the methodology and criteria used to select the most appropriate housing and employment sites is robust, justified and reflects all known supporting evidence base that has been available to inform the decision making process.
2. LUC supplied the Council with SA input as the Local Plan emerged and this input helped the Council to formulate its approach to which sites should be taken forward for allocation. As such it is demonstrated how the SA process has informed the production of the Local Plan as part of its overall evidence base.
3. LUC provided the Council with SA advice and justification at Preferred Options Local Plan consultation stage and Pre-Submission Local Plan consultation. The SA report produced for Preferred Options Local Plan consultation considered sites identified within the Council's Strategic Housing Land Availability Assessment, sites illustrated within the town centre masterplans and Local Development Orders, and sites submitted through the Call for Sites process that had recent developer interest.
4. During the Preferred Options Local Plan consultation, further sites were promoted to the Council. These further sites were subject to SA. The SA published alongside the Pre-Submission Local Plan illustrated the assessment undertaken for these further sites, as well as sites that had previously been considered through earlier stages of SA.
5. Each potential site allocation was subject to SA and assessed on an equivalent basis through this process. In accordance with the Planning Practice Guidance (PPG) all reasonable alternatives were assessed in the same level of detail, as all were assessed against the objectives and decision-making criteria of the SA Framework, and site

alternatives were assessed using the same assumptions (as presented in Appendix 4 of the Pre-Submission SA).

6. Chapter 2 of the Pre-Submission SA sets out how potential site allocations were identified and Appendix 6 presents a summary of the Council's reasoning for allocating or discounting sites as communicated to LUC during preparation of the SA. In relation to the emergence of those reasonable alternative site options considered, the previous iteration of the SA Report (Preferred Options) considered sites identified within the Council's Strategic Housing Land Availability Assessment, sites illustrated within the town centre masterplans and Local Development Orders, and sites submitted through the Call for Sites process that have had recent developer interest. Once the SA Report for the Preferred Options Local Plan was published alongside that version of the Local Plan further sites were promoted. Once the Council had identified the reasonable alternative site options for the Local Plan they were subject to SA by LUC. The findings were presented to the Council officers preparing the Local Plan in August 2016, so that the SA findings could inform decision making about which site options to take forward in the Local Plan. LUC also assessed the additional site options that came through the Preferred Options consultation and similarly passed the appraisal results onto the Council officers preparing the Plan, prior to finalisation of the Pre-Submission version of the Plan.

7. The SA process enabled the Council to make decisions about which alternatives to include in the Local Plan and which to reject, taking into account the findings of the SA, as well as other evidence, national planning policy, and the results of public consultation.

537 words not including titles

**Q2. Having regard to the representations made pursuant to regulation 20 and references to omission sites are there any corrections required to the Sustainability Assessment and if so, would those corrections change the assessments made to the selection of sites for allocation? (Please see the Council's response to the Inspectors Additional Question to the Council [[https://www.oadby-wigston.gov.uk/pages/local\\_plan\\_examination](https://www.oadby-wigston.gov.uk/pages/local_plan_examination)])**

Council's response;

8. No. The Council and LUC are satisfied that the SA Report meets the requirements of the Planning Practice Guidance and Strategic Environmental Assessment Regulations. The representations made on the Pre-Submission version of the Plan and the accompanying SA were considered by the Council and LUC. With regards to the SA, responses to all relevant representations are set out in the document 'Pre-Submission Representations on SA/SEA/HRA and LUC Responses' on the Council's website. This document explains that no further SA work was considered necessary as a result of the representations received. There was one representation that suggested an additional site, Land at Oadby Grange, should have been subject to SA. As explained in the 'Pre-Submission Representations on SA/SEA/HRA and LUC Responses' document, this site was not appraised in the SA as the site was not submitted through the various call for sites exercises and land associated with the site remains subject to a Section 106 Agreement regarding the provision of a Country Park. Due to the above, the site is not considered to be a reasonable alternative for housing development.

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### **Q3. Are the allocated sites deliverable?**

Council response;

#### Direction for Growth Housing Allocations

9. Yes. The Council considers that all of the three Direction for Growth (DFG) areas are deliverable and will be delivered within the Local Plan period 2011 to 2031.

10. Paragraph 27 onwards of the Council's Local Plan Spatial Strategy Submission Statement (LP06/09) sets out why the Council considers that the most appropriate and sustainable sites have been proposed within the Submission Local Plan. Key to each sites appropriateness and sustainability is its location adjacent to and with direct access to the Borough's main road network. Each of the proposed growth areas has direct access onto A Roads or B Roads.

11. As the Local Plan Housing Trajectory (page 29 of LP6/01) illustrates, the proposed DFG areas are due to deliver housing completions between April 2021 and March 2029. The approach taken by the Council to inform the housing trajectory has been conservative, and still each of the DFG areas will be complete 2 years prior to the end of the Plan period. In producing the housing trajectory the Council made informed decisions, however for the purpose of this note, using a crude conservative figure for annual housing provision per developer on large sites, of 50 units per year, it can be assumed that for the three DFG (4 developers as Wigston DFG is a dual branded development) areas at least 200 new homes will be delivered per year. As the housing trajectory illustrates, the maximum annual yield relating to the three DFG areas is 193 units.

12. A high level of certainty can be afforded for all three of the Direction for Growth areas regarding delivery over the Plan period. The Council is working closely with all three land promoters. Two of the Direction for Growth areas (Wigston Direction for Growth and Cottage Farm Direction for Growth) are direct extensions, or 2<sup>nd</sup> Phases to existing housing permissions, one of which (Wigston Direction for Growth) has commenced development. Regarding the Stoughton Grange Direction for Growth area, a Pre-application proposal for Stoughton Grange Direction for Growth area in Oadby has been published, and was subject to a public exhibition on Thursday 22<sup>nd</sup> March 2018.

### Smaller Scale Housing Allocations

13. Yes. The Council considers that all of the smaller scale housing allocations set out in Policy 2 of the Submission Local Plan are deliverable and will be delivered within the Local Plan period 2011 to 2031.

14. As illustrated within the Council's response to the Inspectors Initial Questions to the Council (question 8), 5 of the 7 smaller scale allocations have been considered or are being considered through the planning application process. In relation to the two other sites, one is a Council owned site (Former Oadby Swimming Pool) with Council approval for residential development and one is a site with an adopted Local Development Order (Arriva Bus Depot) which has had developer interest.

### Town and District Centre Allocations

15. Yes. The Council considers that all of the allocations proposed within the Submission Local Plan relating to development within the Borough's town and district centres are deliverable and will be delivered within the Local Plan period 2011 to 2031.

16. The allocations proposed within the Submission Local Plan for the Borough's town and district centres have been informed by the allocations set out in the Council's current Town Centres Area Action Plan Development Plan Document (TCAAP). Upon its adoption, the Council's Local Plan will supersede policies set out in the TCAAP. However, due to the level of detail set out within the TCAAP, it will become guidance relating to delivering the levels of growth set out in the Local Plan. The Submission Local Plan, allows for a greater level of flexibility in terms of the location of development uses and is not specific on which use is located on each of the town and district centre sites proposed for allocation.

17. At the time of its production, the TCAAP was subject to viability and deliverability testing and was found sound and robust at Examination. For the purposes of the Local Plan production the Council commissioned a Whole Plan Viability Study (LP6/20). Part of the viability testing comprised the levels of development proposed for the town and district centres within the Borough. The viability study states at paragraph 7.45 that *'although this report has utilised the delivery as illustrated within the Area Action Plan, and has found each proposed allocation site deliverable and viable, the policy proposal set out within the new*

*Local Plan, that allows for a more flexible approach to town and district centre sites would more than likely increase viability and deliverability across each scheme'.*

### Employment Allocations

18. Yes. The Council considers that all of the employment allocations set out in the Submission Local Plan are deliverable and will be delivered within the Local Plan period 2011 to 2031.

19. The Council's Employment Land and Premises Study (LP8/02) assesses the appropriateness and deliverability of each of the sites proposed for employment allocation within the Submission Local Plan. The study concludes that each of the sites proposed for allocation are deliverable and there is sufficient developer interest for employment within the Borough area up to 2031. The vast majority of the proposed additional employment use allocations (7.67 hectares) within the Submission Local Plan is located on two sites, the Wigston Direction for Growth area and Oadby Sewage Treatment Works, both of which have significant land promoter involvement as well as specific policies within the Submission Local Plan (Policy 19 and Policy 20).

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**Q4. Do Policies 17 – 21 relating to specific sites / Direction for Growth areas provide sufficient detail to provide clarity to developers, local communities and other interests about the nature and scale of development envisaged on each site (addressing the “what, where, when and how” questions) in accordance with Planning Practice Guidance (ID 12-002)?**

Council response;

20. Yes. The Council considers that each of the site specific policies contained within the Submission Local Plan provide sufficient detail and clarity with regards to the nature and scale of development envisaged.

21. National Planning Practice Guidance at paragraph 002 reference ID: 12-002-20140306 sets out what a Local Plan should contain. It states that the Plan should make clear ‘what’ is intended to happen in the area over the life of the plan, ‘where’ and ‘when’ this will occur and ‘how’ it will be delivered. The paragraph goes on to suggest that such can be achieved by setting out broad locations and specific allocations of land for different purposes. Further it suggests that a policies map must illustrate geographically the application of policies in a development plan.

22. For the purposes of the Submission Local Plan the Council has set out specific allocations of land for different purposes, specifically Local Plan Policies 17, 18, 19, 20 and 21. The Council’s proposed Submitted Policies Map sets out ‘where’ the allocation sites are located within the Borough area and ‘what’ (except for the Kilby Bridge Settlement Envelope) the predominant allocation use is, for example residential or employment. Each of the specific policies also set out the permitted uses for each of the allocation sites.

Policy 17

23. Rather than a site specific development opportunity, like all of the other allocations specified in the policies mentioned above, Policy 17 allocates the developable extent boundary for the Kilby Bridge hamlet / settlement. The extent of the boundary comprises the brownfield land element of Kilby Bridge. Policy 17 sets out the maximum levels of residential development as well minimum required development densities. The Policy also sets out a number of Kilby Bridge key objectives that seeks to safeguard the existing local

economy as well as enhance it through the delivery of small scale outdoor leisure, recreation and tourism development. With regards to delivery, there is currently three sites within the boundary that are being promoted for residential led development; one promoted by the Canal and Rivers Trust alongside its development partner H2O developments; one being promoted for residential development by Pegasus Planning on behalf of the landowner; and another being promoted by Gordon White Hood on behalf of the landowner. It has been illustrated to the Council that all three of the sites could come forward within the next 5 year period. The Council has not currently specified the Kilby Bridge development opportunities within the Local Plan housing trajectory as they are not site specific allocations, however it is extremely confident that the Kilby Bridge development opportunities would come forward during the Plan period up to 2031, if not within the next 5 years. Due to the brownfield nature of the sites, they will be assessed by the Council in its annual monitoring exercise taking place this April, namely the Strategic Housing Land Availability Assessment.

#### Policy 18

24. In addition to the Stoughton Grange Direction for Growth area being allocated on the Council's proposed Adopted Policies Map, the policy itself specifies its location. The policy also sets out the land use types, levels and scale of development required, as well density requirements and site specific mitigation measures expected.

25. The expected delivery of the site, specifically its residential element is factored into the Local Plan housing trajectory that is set out within Policy 2 Spatial Strategy for Development within the Borough. The site comprises part of the housing provision figure for 'New Additional Homes on Direction for Growth Areas' in the table. The table illustrates that all of the growth expected on the three Direction for Growth areas will be provided in full by the monitoring year 2028/2029.

26. Although the site is not being promoted by a developer, the land promoter has undertaken market testing regarding the sites 'saleability'. The testing has illustrated that there is approximately 10 different housing developers that would be interested in developing the site once it is opened to the market.

## Policy 19

27. In addition to the Oadby Sewage Treatment Works being allocated for employment use on the Council's proposed Adopted Policies Map, the policy itself outlines its location. The policy also sets out the specific appropriate land uses and the fact that it will form an extension to the existing employment area of Kenilworth Drive.

28. The site was submitted to the Council by GL Hearn on behalf of Severn Trent Water, during the Local Plan Call for Sites process for employment uses. The reason for its submission was the fact that its current use as a sewage works was coming to 'an end of life' stage, therefore alternative uses were being considered.

29. The Council Employment Land and Premises Study (LP8/02) has assessed all of the proposed employment use sites for their appropriateness and suggests that it will be delivered within the Plan period up to 2031. The report also highlights that there is currently good market demand for employment spaces within the Borough. The Council does not therefore envisage any issues in delivering the site once it is opened to the market.

## Policy 20

30. In addition to the Wigston Direction for Growth area being allocated on the Council's proposed Adopted Policies Map, the policy itself specifies its location. The policy also sets out the land use types, levels and scale of development required, as well density requirements and site specific mitigation measures expected.

31. The expected delivery of the site, specifically its residential element is factored into the Local Plan housing trajectory that is set out within Policy 2 Spatial Strategy for Development within the Borough. The site comprises part of the housing provision figure for 'New Additional Homes on Direction for Growth Areas' in the table. The table illustrates that all of the growth expected on the three Direction for Growth areas will be provided in full by the monitoring year 2028/2029.

32. David Wilson and Barratt Homes are the developers actively promoting the proposed allocation.

## Policy 21

33. In addition to the Cottage Farm Direction for Growth area being allocated on the Council's proposed Adopted Policies Map, the policy itself specifies its location. The policy also sets out the land use types, levels and scale of development required, as well density requirements and site specific mitigation measures expected.

34. The expected delivery of the site, specifically its residential element is factored into the Local Plan housing trajectory that is set out within Policy 2 Spatial Strategy for Development within the Borough. The site comprises part of the housing provision figure for 'New Additional Homes on Direction for Growth Areas' in the table. The table illustrates that all of the growth expected on the three Direction for Growth areas will be provided in full by the monitoring year 2028/2029.

35. Bloor Homes are the developers actively promoting the proposed allocation.

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**Q5. Are policies worded to ensure that they will be effective and that it would provide a clear indication of how a decision maker should react to a development proposal? (Please see the Council's response to the Inspector's Initial Questions to the Council (Q14))**

Council response;

36. Yes. The Council considers that with the proposed changes / clarifications set out within the Council's response to the Inspectors Initial Questions to the Council, the policies set out within the Submission Local Plan are effective and do provide clear indication of how a decision maker should react to a development proposal.

52 words not including title