

**Local Plan Preferred Options Consultation November-December 2016**

Consultation Response Received (Date)	Representation Received From	Policy Issues Raised	Response Given From Local Planning Authority (LPA)
8/11/16	Sport England	Corporate Priorities - We support the objective of improving the health of residents.	The Council acknowledges and welcomes the support of Sport England.
8/11/16	Sport England	With regard to addressing key issues and objective 11 (and policy 5.2, para 5.27, policy 5.3 ) - Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance. Which can be found on our website.	The Council will seek to take account of the Active Design Principle guidance during the preparation of the Local Plan Pre-submission document. The Council will also seek to encourage the use of such guidance during the planning application decision making process.
8/11/16	Sport England	Policy 5.4 Community Facilities does this include sports and leisure facilities?	Built sports and leisure facilities will not be included within Policy 5.4 Community Facilities. Built sports and leisure facilities will be referenced within Policy 5.6 Open Space, Sport and Recreation Facilities as they provide a key sport and recreation resource to the Borough's residents and visitors alike.
8/11/16	Sport England	Policy 5.5 promotion of accessibility is active recreation possible walking cycling etc.	Comment noted.

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8/11/16	Sport England	<p>Sport England supports section 5.6 in principle however we are concerned that the Councils 2009 study is now out of date and not therefore robust and not therefore in accordance with para 73 of NPPF. Sport England does not support the use of standards for the provision of outdoor sports space.</p> <p>It is not Sport England's role to comment on how the Council prepares its evidence base for other types of open space but Sport England does not consider that the 'standards' approach used in the draft Study is appropriate for sport and recreation or compliant with Paragraph 73 and 74 of the National Planning Policy Framework (NPPF). Paragraph 73 of the NPPF requires a different approach to determining need for sport and recreation compared to that included in the former PPG17 and its associated documents. The NPPF paragraph 73 requires Local Authorities to assess needs and quantitative or qualitative deficits or surpluses of sports and recreational facilities in the local area. Information gained from the assessment should be used to determine what open space, sports and recreation provision is required. For assessing the need for sport and recreation, the Government has advocated the use of Sport England's Playing Pitch Strategy Guidance and Assessing Needs and Opportunities Guidance, it does not advocate the use of the deleted</p>	<p>Paragraph 73 of the National Planning Policy Framework suggests that <i>'planning policies should be based on robust and up to date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision'</i>.</p> <p>The Council undertakes an Open Space Audit on an annual basis to ensure that the provision of open space, sports and recreation facilities is assessed on an ongoing basis and the evidence that underpins the standards used by the Council is up to date and robust.</p> <p>National Planning Practice Guidance states that <i>'it is for the local planning authorities to assess the need for open space and opportunities for new provision in their areas'</i>. It is acknowledged by the Council that reference is made within the National Planning Practice Guidance to Sport England guidance.</p> <p>The guidance published by Sport England refers specifically to sport facilities and not more generally to open space in the broader sense, for example recreation grounds, informal open space, natural green space etc. The Council will use the standards set out in the original Open Space, Sports and Recreation Facilities Study for non sporting open space as they are still relevant and robust. Taking account of Sport England's comments the Council will use the Playing Pitch Strategy as a basis for the provision of the outdoor sports space typology rather than standards.</p> <p>The Council is continually striving to meet the provision needs for each typology as set out within the</p>
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		Assessing Needs and Opportunities Companion Guide attached to PPG17 which uses the 'standards' approach.	Council's Open Space, Sport and Recreation Facilities Study. The Council has always proactively sought the provision of new open space and has also resisted the loss of open space with the aid of the Council's study and relevant planning policy. The Study has also been utilised recently to uphold planning appeals that sought to develop on open space land within the Borough.
8/11/16	Sport England	Sport England is concerned that there is no reference to the council developing playing pitch strategy which is currently undertaking and is in the consultation stage with National Governing Bodies for sport. Sport England does <b>not</b> therefore support Policy 5.6, in relation to the use of standards there is also reference to protection of facilities unless an assessment has been carried out the PPS is such an assessment.	The Council is currently finalising a Playing Pitch Strategy and should have made mention of the strategy within the Preferred Options document. With the strategy being an important part of Local Plan evidence base, it will be referred to within the Pre-Submission Local Plan document.
8/11/16	Sport England	In addition how will built sports facilities be assessed? As far as we are aware the authority does not have an up to date built sports facilities strategy (para 73 NPPF). Without such evidence we are unsure how the council is planning positively Para 70 NPPF.	The local authority will work with Sport England to assess the built sporting facilities within the area. The Council has recently developed two new leisure centres and has a number of other community use facilities. These will be taken account of through the partnership working with Sport England.
9/11/16	Adam Krupa (Local Resident)	I have looked over the plan and think that it's really weak and quite simply a lot of hot air.  O&W council still use dirty energy from British Gas Flooding measures are poor (re: A6) House building with ZERO travel plan in place Roads are getting gridlock each morning Pollution levels are high in Oadby	The Council always strives to produce plans that are aspirational yet deliverable. The Council also has to take account of a plethora of national government guidance and policy when producing plans. The Council cannot agree with the comment regarding the strength of the Local Plans content. As with all planning documents that the Council produces the Preferred Options Local Plan document is underpinned by a justified, robust and up to date evidence base.

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		<p>Does the writer of the document really understand Green issues? Sustainable dwellings - your power seems to be extremely weak you know public transport is poor, but you have no solutions.</p> <p>This was just from my first glance at the document..</p>	<p>The Pre Submission Local Plan document will also be underpinned by robust evidence base.</p>
18/11/16	Kevin South (Local Resident)	<p>Culture and history environment assets 10 - 4 page 128</p> <p>Granville road in wigston is one of oldest roads in borough with more significant houses now documented by council and civic history society. Has more significant houses than any other street and founded as separate enclave from wigston magna by Leicester and Leicestershire land society needs highlighting with info - and sign posts. No other road in borough has a unique history and linked to Leicester high profile mayor. Road did have cobbles and gas lamps. Cobbles under Present road</p> <p>Landscape and Character 10-8 page 127. Granville road is unique in borough and tree lined lane with hedges lost in time. like a county lane and trees and hedges need protecting and adding to. Needs special status and needs adding to borough plan.</p> <p>Granville rd needs to be added to borough plan and assessment done of its borough value.</p>	<p>Through the preparation of the Local Plan the Council will be undertaking a review of its existing Landscape Character Assessment. The Council will ensure that through the Landscape Character Assessment review, Granville Road will be assessed and taken account of as necessary. The Council is aware of the history of Granville Road and its importance to Wigston.</p> <p>The Landscape Character Assessment review will seek to protect all important landscape areas of the Borough from inappropriate development.</p>

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24/11/16	Planning Bureau Limited (Affordable Housing Provision For Elderly Population)	<p>We reiterate our support for the positive approach taken by the Council in the delivery of specialist accommodation for the elderly in sub-chapter 6.1: Housing Choices. Specifically we support the acknowledgement of the historic under-provision of specialist housing in paragraph 6.2 and the support for the development of such forms of accommodation in the wording of Policy 6.1.</p>	<p>The support is acknowledged and welcomed by the Council.</p>
24/11/16	Planning Bureau Limited (Affordable Housing Provision For Elderly Population)	<p>We are however concerned over the Council's proposed approach towards the provision of Affordable Housing and Starter Homes in Policy 6.3. We note that in paragraph 6.12 that the Council stipulates that "The provision of starter homes will not be in place of affordable homes provision on-site, it will be in addition too, and vice versa.'</p> <p>The Housing and Planning Act 2016 set out the primary legislation for Starter Homes and in doing so widened the definition of Affordable Homes to include Starter Homes. The Council is in effect stipulating a requirement for 50% affordable housing requirement in Oadby.</p> <p>The NPPF state that sustainable development' requires careful attention to viability and costs in plain-making and decision-taking' (paragraph 173). Similarly requirements for affordable housing 'should assess the likely cumulative impacts on development in their area of all existing and proposed local standards' (paragraph 173).</p>	<p>Comment noted.</p> <p>The Council will amend the wording of the Local Plan to ensure that it better reflects the definitions as set out within the Housing and Planning Act 2016 and / or any further national policy or guidance specific to Starter Homes.</p> <p>The Council has produced an Affordable Housing Viability Assessment (2016) that evidences and justifies the Council's proposed policy approach for provision of affordable housing within the Borough.</p>

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		<p>There was no publicity available viability evidence to support the Council's position that a 20% starter Homes requirement and a 10%-30% affordable housing requirement is deliverable. Robust evidence supporting the Council's approach as we are very concerned that a 50% affordable housing requirement would render specialist older persons' housing unviable in the Authority.</p>	
5/12/16	Keith Ambridge (Local Resident)	<p>Firstly the idea of having Lidl and Wickes in the old Premier drum factory on Station Road/Blaby Road is mad, with all the traffic it is very slow now, also when is the new housing estate on Newton Lane starting and what are you going to do re the road system to take all the extra traffic and what about a new school or does that come last as usual and Doctors surgery's now that Long St Surgery has closed the Two Steeples won't cope.</p>	<p>The Council's Local Plan does not identify nor allocate the former Premier Drum site for retail development. The Council however is currently deciding upon a planning application that was submitted to the Council that seeks the change of use of the former Premier Drum site to retail uses.</p> <p>As far as the Council is aware, the Newton Lane development will commence during the earlier months of 2017. Through the decision making process that was undertaken for the Newton Lane site, mitigation measures were put in place regarding education facilities and highways. All relevant information regarding the Newton Lane site will be available to view at the Council or on the Council's website.</p>
9/12/16	Natural England	<p>Natural England has made comments on previous iterations of the local plan so we have nothing further to add here except to welcome the many references to the protection of natural greenspace, biodiversity, wildlife habitats and landscape character. We particularly welcome Section 10.1 - Biodiversity and Geodiversity. We also note and welcome the commitment to green infrastructure provision with its potential to</p>	<p>The Council acknowledges and welcomes Natural England's comments.</p>

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		improve health and wellbeing.	
9/12/16	Natural England	It would be inappropriate for Natural England to comment on the preferred options for site allocations. Our interests relate purely to any potential impact on the natural environment, including biodiversity, landscape character and protected species. We are particularly keen to avoid any adverse impacts on nationally and internationally designated nature conservation sites such as Sites of Special Scientific Interest (SSSIs) which are protected under the Wildlife & Countryside Act 1981 (As Amended).	The Council will take account of Natural England's comments when seeking to allocate land for development within the Local Plan.
9/12/16	Natural England	Within Oadby & Wigston, care should be taken to avoid any development with a potentially harmful effect on the Kilby-Foxton Canal Site of Special Scientific Interest (SSSI) which forms part of the Grand Union Canal, specifically the section between Kilby and Foxton including the Limedelves Quarry and the surrounding grassland.	The Council will take account of Natural England's comments when seeking to allocate land for development within the Local Plan. Specifically, should any land be identified within the vicinity of the Kilby-Foxton Canal Site of Special Scientific Interest (SSSI).
9/12/16	Natural England	<b>Sustainability Appraisal Report</b> We welcome the Preferred Options Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) report and consider that the methodology and baseline information used to inform the report appears to meet the requirements of the SEA Directive (2001/42/EC) and associated guidance. We note that the conclusions of the SA will be made with more certainty during later stages of the Plan preparation process.	The Council welcomes Natural England's comments regarding the methodology and baseline information of the SA and SEA report.
9/12/16	Natural England	<b>Habitats Regulations Assessment (HRA)</b>	Comment noted.

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		<p><b>Screening Report</b></p> <p>We note the conclusion that the potential for the Oadby and Wigston Local Plan Preferred Options to have likely significant effects on European sites in combination with the Local Plan for Harborough District could not yet be ruled out, due to the early stage of the Harborough Local Plan and the lack of solid HRA conclusions. We welcome the proposal to revisit the HRA Screening Report as the local plan progresses and any new evidence relating to the Harborough Local Plan becomes available.</p>	
9/12/16	Landmark Planning On Behalf Of Draper Property	<p><b>Policy 4.2</b> of the Preferred Options (PO) consultation states that the Council will allocate sufficient land to meet the housing needs of the Borough (in bullet point 1) yet, as acknowledged in the Position Statement there is County-wide work being carried in respect of objectively assessed housing needs with the HEDNA. This is cited as justification for policy 4.2 not containing target dwellings per annum figure. Whilst it is appreciated that the Council wish to make progress with the Local Plan such a critical omission from the content of the Plan provides no certainty for developers, land owners or the residents of the Borough and means that the Plan is not being positively prepared. The findings of the HEDNA may give rise to an increased requirement for new dwellings in the Borough (over and above the 95 dwellings set out at Issues and Options stage). This may require the Borough to alter</p>	<p>Comment noted.</p> <p>The Council will ensure that the Pre-Submission Local Plan document is based on up to date and robust evidence. The Council will also take account of the outcomes of the HEDNA. The Council's Pre-Submission Local Plan document will specify a housing target for the Plan period up to 2036.</p> <p>The Council will be undertaking site assessment evidence base work to ensure that (if required to do so) any land identified for residential development during the Local Plan plan period up to 2036 is sustainable, located in the most appropriate location, viable and deliverable.</p>

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		their overall strategy, particularly with regard to the need to allocate specific sites for new development.	
9/12/16	Landmark Planning On Behalf Of Draper Property	In addition, there is reference in the Strategic Context of the Plan to the preparation of the Leicester and Leicestershire Strategic Growth Plan. This Plan, whilst having a longer timeframe than the Local Plan, will also reference the amount and location of development that will be required in the Borough. In a similar vein to the relationship with the HEDNA, the preparation of the Local Plan without reference to a target figure provides little certainty for the future.	<p>Comment noted.</p> <p>The Council will ensure that the Pre-Submission Local Plan document is based on up to date and robust evidence. The Council will also take account of the outcomes of the HEDNA. The Council's Pre-Submission Local Plan document will specify a housing target for the Plan period up to 2036.</p>
9/12/16	Landmark Planning On Behalf Of Draper Property	The sixth bullet point of policy 4.2 acknowledges that there is a need for further greenfield land releases for provide for new dwellings. As indicated in my representations in respect of the Issues and Options consultation at point 5, my clients own land at Wigston Road, Oadby (page 48 of the 2012 SHLAA). Although potentially affected by flood risk, further work has been carried out to mitigate this risk. Notwithstanding its designation as Green Wedge, a selective release of part of the site (the north eastern area of the site north of the Washbrook) for residential development with the remainder of the site (outside of the Football Club area) being given over to nature conservation would be an environmentally appropriate and sustainable development.	<p>Comment noted.</p> <p>The Council will be undertaking site assessment evidence base work to ensure that (if required to do so) any land identified for residential development during the Local Plan plan period up to 2036 is sustainable, located in the most appropriate location, viable and deliverable.</p>
9/12/16	Landmark Planning On Behalf Of	<b>Policy 7.1</b> Of the draft PO Plan indicates that the Borough Council will allow greenfield	<p>Comment noted.</p> <p>The Council will ensure that the Local Plan complies</p>

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	Draper Property	releases outside of the urban area where the need cannot be met through development within the town centres and the Leicester PUA and that potentially green wedge sites will be considered. Whilst in principle this approach is supported, in practice, it will be difficult to ensure that town centre and PUA sites have been 'exhausted' before greenfield sites outside of these areas are considered favourably. The operation of a policy of 'reasonable alternatives' is problematic, time consuming and not a positive way to approach development site selection.	with policy and guidance set out nationally. The Council is aware that it would not be appropriate to 'put all of its eggs in one basket', therefore will allocate sufficient land to ensure choice and competition in the market.
9/12/16	Hunter Page Planning On Behalf of Farmcare Ltd	We acknowledge that the exact number and location of greenfield release sites is yet to be confirmed as the full extent of the Borough's housing need has not been confirmed. Nevertheless, we wish to continue to promote land north-east of Oadby (referred to as site ref. OWBC23 within the associated sustainability appraisal) for residential and associated uses.	Comment noted.  The Council will be undertaking site assessment evidence base work to ensure that (if required to do so) any land identified for residential development during the Local Plan plan period up to 2036 is sustainable, located in the most appropriate location, viable and deliverable.
9/12/16	Hunter Page Planning On Behalf of Farmcare Ltd	The assessment of the site within the sustainability appraisal concludes that, due to its size, the site could have a significant positive impact on the provision of affordable housing. It is also concluded that the site is sustainably located in order to access a range of existing services and facilities without using the private car (criteria 2, 16, 17, 21 and 22), and could deliver on-site open space that would provide opportunities for leisure and recreation (criterion 3). Moreover, the site is free of any environmental and heritage constraints	The Council will be undertaking site assessment evidence base work to ensure that (if required to do so) any land identified for residential development during the Local Plan plan period up to 2031 is sustainable, located in the most appropriate location, viable and deliverable.  The SA has been undertaken in line with the agreed SA framework and assumptions set out in Appendix 4 of the SA Report. Options have been assessed against the baseline and, in line with the precautionary principle, do not take into account potential mitigation measures, as there is no guarantee of these being

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		(criteria 7, 9, 10 and 11). Any adverse impacts on biodiversity can be adequately mitigated through the site's development, resulting in an enhancement of the site's biodiversity value.	delivered.
9/12/16	Hunter Page Planning On Behalf of Farmcare Ltd	The sustainability appraisal demonstrates that this site scores similarly to site ref. OWBC21 (Land at Cottage Farm, south of A6), and better than site ref. OWBC16 (Land west of Welford Road) which is situated within an Area of Archaeological Potential and a Conservation Area and is partly located within Flood Zones 2 and 3. These sites are identified as options for greenfield release sites at the end of Policy 7.1. In light of the above, land north-east of Oadby should also be considered as an option to deliver future growth within the Borough. As outlined within our representations on the Draft Oadby and Wigston Strategic Housing Land Availability Assessment 2015 report (dated 23rd November 2015, and enclosed), the site is available, suitable and achievable, and is therefore deliverable in accordance with the guidance contained within the National Planning Practice Guidance. Furthermore, its development would be constitute a logical extension to Oadby and would significantly contribute towards meeting the Borough's housing need.	Comment noted. Once preferred site allocations have been selected, the SA will document the Council's reasons for selecting or not selecting each option.
9/12/16	Theatres Trust	<b>Chapter 4, Page 32, Policy 4.2</b> The Theatres Trust welcomes this policy, particularly the second last dot point which seeks to protect and promote cultural facilities and opportunities, and therefore	The Council acknowledges and welcomes the Theatre Trust's comments.

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		reflects guidance in para. 70 and 156 of the NPPF.	
9/12/16	Theatres Trust	<b>Chapter 5, Page 43, Policy 5.4</b> The Theatres Trust welcomes this policy, as it seeks to protect and promote cultural facilities and opportunities, and therefore reflects guidance in para. 70 and 156 of the NPPF.	The Council acknowledges and welcomes the Theatre Trust's comments.
9/12/16	Theatres Trust	<b>Chapter 8, Page 84, Policy 8.2</b> The Theatres Trust welcomes the supporting text to this policy as it acknowledges the role of cultural facilities to the vitality of centres and therefore reflects guidance in para. 23 of the NPPF.  Council may like to consider extending the scope of policy 8.2 to also include: <i>The temporary and meanwhile use of vacant buildings and sites by creative, cultural and community organisations will also be supported where they help activate and revitalise town and local centre locations.</i>	The Council will consider whether it is appropriate to include the text proposed by the Theatres Trust relating to Policy 8.2.
12/12/16	Highways England	In relation to Oadby and Wigston Local Plan, Highways England's principal interest is safe guarding the operation of the M1 which routes approximately 5 miles west of the Local Plan area.	Comment noted.
12/12/16	Highways England	Highways England notes that a small number of sites have been put forward for residential and/or employment use including at Kilby Bridge Village Envelope, Stoughton Grange and Oadby Sewage Treatment Works. Although the specific figures are not provided, it is noted that the sites are proposed for small-scale development and in	The Council acknowledges and welcomes the Highways England comment.

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		<p>this context, Highways England considers that there will be no impacts on the operation of the SRN, especially given the distance of the nearest section of SRN from the Local Plan area.</p>	
12/12/16	Highways England	<p>Highways England notes Policy 7.5: Wigston Direction for Growth Area which includes proposals for a larger growth site including a minimum of 500 new homes and 2.5 hectares of employment land (in addition to the 450 dwellings and 2.5 hectares of employment land which have already received planning consent). Highways England considers that the scale of this development could have some impacts on the operation of the SRN and therefore welcomes the reference in Policy 7.5 that “and proposal would also be required to submit a Transport Assessment as part of any planning application to ensure that Leicestershire County Council Highways Department can fully assess any traffic / transport implications stemming from the development”. The Transport Assessment would also help Highways England to better understand any potential impacts upon its network and it is considered that this could also be included within this policy reference.</p>	<p>The Council acknowledges and welcomes the Highways England comment.</p>
12/12/16	Highways England	<p>Highways England acknowledges and welcomes “Objective 10” of the Local Plan which promotes the use and development of sustainable transport in the local community, as well as ensuring the delivery of an efficient and accessible highway network and transport system.</p>	<p>The Council acknowledges and welcomes the Highways England comment.</p>

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		Highways England has no further comments to provide at this stage and trusts the above is useful in the progression of the Oadby and Wigston Local Plan.	
13/12/16	Historic England	<p><b>Evidence base</b>  The evidence base is critical to the preparation of a Local Plan in accordance with paragraph 169 and 10 of the NPPF. Particularly relevant to site and allocations and designations could include the following:-</p> <ul style="list-style-type: none"> <li>• Updating conservation area appraisals</li> <li>• Undertaking characterisation studies</li> <li>• Producing setting studies – of specific settlements, or specific heritage assets</li> <li>• Local lists</li> <li>• Assessments of landscape sensitivity</li> </ul> <p>If these have been carried out, it would be helpful to make their location clearer.</p>	<p>Comment noted.</p> <p>All evidence base documents will be made easily available during the next stage of consultation.</p>
13/12/16	Historic England	<p><b>Chapter Two – Spatial Portrait</b>  The historic development of Oadby and Wigston within ‘Physical Characteristics’ emphasising its historic development is welcomed.</p> <p>To ensure compliance with the NPPF and more closely reflect NPPF terminology, ‘Environmental Characteristics’ (including historic assets)’ should be revised to substitute ‘<i>historic</i>’ for ‘<i>heritage</i>’.</p> <p>Paragraph 2.37 is welcomed. This paragraph would be strengthened by reference to non-designated heritage assets and archaeology. Similarly within the ‘Addressing Key Issues and Challenges and Maximising Opportunities by 2036’ box on page 22, ‘built environment assets’ should be amended to</p>	<p>Comment noted.</p> <p>The wording of the spatial portrait will be amended to better reflect the wording expressed within the National Planning Policy Framework.</p> <p>Paragraph 2.37 will also be amended to include non designated heritage assets and archaeology.</p>

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		reflect the NPPF, such as ‘heritage assets and their settings’, which may be best placed within a separate bullet point.	
13/12/16	Historic England	<p><b>Chapter Three – Vision and Objectives</b> Reference to heritage assets should be made within the main text and within the outcomes; an additional bullet point would be beneficial such as:- “Conserving and enhancing heritage assets and their settings”</p>	<p>Comment noted.</p> <p>The wording proposed will be added into the Vision and Objectives section of the Pre-Submission Local Plan.</p>
13/12/16	Historic England	<p><b>Objectives for the Local Plan</b> Objective 4: Enhancing Local Heritage is strongly welcomed, in particular the reference to settings within the second bullet point. Reference to heritage assets should be included to ensure compliance with the NPPF such as:- <i>“To conserve and enhance the Borough’s heritage assets, respecting historic buildings and their settings, links and views.”</i></p>	<p>Comment noted.</p> <p>The wording of the Vision and Spatial Objectives will be amended to better reflect the wording expressed within the National Planning Policy Framework.</p>
13/12/16	Historic England	<p><b>7.2 Kilby Bridge Village Envelope</b> The Village Envelope includes land within or partly within the Grand Union Canal Conservation Area and impact upon this must be assessed. This should also be reflected within policy 7.2, such as an additional bullet point within the objectives to read:- <i>“Conserve and enhance the Grand Union Canal Conservation Area”</i> It is not clear which site assessment within the Sustainability Appraisal is relevant to this policy; it is not possible to comment fully without this information.</p>	<p>An additional bullet point will be added to the Kilby Bridge Envelope policy to reference the conserving and enhancing of the Grand Union Canal Conservation Area.</p> <p>The assessment of Policy 7.2 Kilby Bridge Village Envelope considers the Grand Union Canal Conservation Area via SA objective 7 (historic environment). The SA concludes that this policy will have positive effects with regards to the historic environment, including the conservation area, as it requires new development to take account of the conservation area and to complement the area. This will be strengthened by adding the suggested additional bullet point to the policy.</p>

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			<p>The SA does not include a site assessment for Kilby Bridge Village Envelope, as it is not a site allocation, rather it is a development management policy that is applied to all development within the village envelope.</p> <p>The Grand Union Canal Conservation Area that is situated within close proximity to any proposed development will be assessed to ascertain whether there are any impacts upon it stemming from the potential development.</p>
13/12/16	Historic England	<p><b>Policy 7.3 Stoughton Grange</b>          There are three Grade II Listed buildings adjacent to the site, as acknowledged within paragraph 7.14. To the east, within Harborough district, is Stoughton Conservation Area, 'Moated Grange at Stoughton' Scheduled Monument (1010482) and numerous Listed Buildings, including the II* Church of St Mary and its Cross. Further assessment will be required in relation to all heritage assets. The Sustainability Appraisal concludes that the site has a potential significant negative effect upon heritage assets. More detail is required as to what is proposed at the site.</p>	<p>Comment noted.</p> <p>The wording of the policy will be amended to suggest that any development on the site will require further assessment regarding impact upon the adjacent heritage assets.</p> <p>The SA acknowledges that '<i>the area is surrounded by a number of designated heritage assets</i>'.</p>
13/12/16	Historic England	<p>If the site is found to be acceptable following further assessment, in accordance with the aims of the NPPF in order to ensure a sound plan, the nearby heritage assets should be referenced within Policy 7.3, such as an addition to the first paragraph as follows :-  <i>"The Council will consider new development proposals that seek to create a sustainable, well designed and high quality development at this sensitive site that will not have a</i></p>	<p>Policy 7.3 will be amended to better reflect the historic and archaeological character of the Stoughton Grange site.</p>

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		<i>detrimental impact on the surrounding Green Wedge and Countryside and will conserve and better reveal the historic significance of the site including its listed and unlisted historic buildings, and archaeological remains in particular in relation to the former Stoughton Grange and surviving elements of designed landscape and planting.”</i>	
13/12/16	Historic England	<p><b>7.4 Oadby Sewage Treatment works</b> It is not possible to assess the impact of potential future development at the site without an allocation plan. Historic England would be happy to advise further upon provision of a plan, which it is understood will be provided as part of the next consultation. It is noted that the Sustainability Appraisal site appraisal shows a potential negative impact upon heritage assets.</p>	<p>Comment noted. The Pre Submission Local Plan will include allocation plans and boundary extents. The Council would appreciate Historic England’s input during that stage of consultation.</p> <p>The SA has been undertaken in line with the agreed SA framework and assumptions set out in Appendix 4 of the SA Report. The SA has highlighted that development may lead to negative effects on nearby heritage assets, but that this is uncertain as this depends on the design of development.</p>
13/12/16	Historic England	<p><b>7.5 Wigston Direction for Growth</b> It is not possible to assess the impact of potential future development without an allocation plan. Historic England would be happy to advise further upon provision of a plan, which, again, it is understood will be provided as part of the next consultation.</p>	<p>Comment noted.</p> <p>The Pre Submission Local Plan will include allocation plans and boundary extents. The Council would appreciate Historic England’s input during that stage of consultation.</p> <p>The SA has been undertaken in line with the agreed SA framework and assumptions set out in Appendix 4 of the SA Report. A potential significant negative effect has been identified, in line with the precautionary principle. The effect is uncertain as this depends on the design of development and potential for archaeological finds.</p>
13/12/16	Historic England	<b>7.6 Regeneration Schemes and Large</b>	Comment noted.

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		<p><b>Scale Change</b> In order to ensure that heritage assets are fully assessed, a further bullet point within Policy 7.6 is recommended:- <i>“Conserve and enhance heritage assets and their settings”</i></p>	<p>A further bullet with the wording suggested will be added to the Regeneration Schemes and Large Scale Change policy.</p>
13/12/16	Historic England	<p><b>9.1/2 Primary / Secondary frontages</b> It must be ensured that this flexibility conserves and enhances heritage assets and their settings. Article 4 directions may be necessary on specific frontages; safeguards will be necessary where heritage assets could be affected. How will the plan manage the changes as a result of this relaxation?</p>	<p>The Proposed policy contained within the Preferred Options Local Plan has not relaxed policy relating to Primary or Secondary frontages within the town or district centres of the Borough. The policies are a direct reflection of the policies contained within the current Town Centres Area Action Plan DPD and the Saved Local Plan. The Council is seeking to conserve and enhance heritage assets.</p>
13/12/16	Historic England	<p><b>Policy 9.6 Shop Fronts</b> Policy 9.6 is strongly welcomed.</p>	<p>The Council acknowledges and welcomes the Historic England comment.</p>
13/12/16	Historic England	<p><b>10.4 Culture and Historic Environment Assets</b> The inclusion of policy 10.4 ‘Culture and Historic Environment Assets’ is strongly welcomed. In order to more closely reflect the NPPF, reference to ‘protect’ in the first line should be substituted with ‘conserve’. Reference to non-designated heritage assets is strongly supported; for clarity, non-designated heritage assets should also be included within the bullet point list of heritage assets. The third paragraph should also include reference to other evidence such as Conservation Area Appraisals. To ensure compliance with the NPPF, paragraph four should be amended to:-  <i>“All development proposals should seek to safeguard conserve or enhance both designated and non-designated assets, and</i></p>	<p>Comment noted.  The wording of the Policy 10.4 Culture and Historic Environment Assets will be amended to better reflect the wording expressed within the National Planning Policy Framework.</p>

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		<p><i>their settings as well as the character and setting of areas of acknowledged significance. “</i></p> <p>Further to this, paragraph six, would benefit from the addition of the words “<i>which outweigh that harm or loss</i>” to the end of the sentence as follows:-</p> <p><i>“Where development is likely to have a significant adverse impact on designated heritage assets and their settings and cannot be avoided or they cannot be preserved in situ, the development will not be permitted, unless there are substantial public benefits, which outweigh that harm or loss”</i></p> <p>Will the policy be strategic? Paragraph 156 of the NPPF stresses that Local Plans should include strategic policies to deliver conservation and enhancement of the historic environment.</p>	
13/12/16	Historic England	<p><b>Policy 10.5 Development in Conservation Areas</b> Policy 10.5 is welcomed.</p>	The Council acknowledges and welcomes the Historic England comment.
13/12/16	Historic England	<p><b>Policy 10.7 Countryside</b> Reference to archaeological or historic resources is welcomed.</p>	The Council acknowledges and welcomes the Historic England comment.
13/12/16	Historic England	<p><b>Policy 10.8 Landscape and Character</b> Policy 10.8 Landscape and Character is welcomed.</p>	The Council acknowledges and welcomes the Historic England comment.
13/12/16	Tetlow King Planning (C/O Rent Plus)	<p><b>Chapter 6: Housing Delivery</b> As noted in the Preferred Options document, the delivery of affordable housing is of clear importance to the Borough, and is increasingly difficult with cuts to grant funding</p>	Comment noted.

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		and other economic factors impacting development. Rentplus is an innovative product that can deliver significant quantities of affordable housing without recourse to grant funding, and by partnering with Registered Providers already active in the Borough, can help diversify the local housing stock whilst still providing high quality affordable housing to local households in need.	
13/12/16	Tetlow King Planning (C/O Rent Plus)	<p>We recommend that <b>Policy 6.1: Housing Choices</b> is amended as follows:  <i>All new residential development should contribute towards delivering a mix of dwelling types, tenures and sizes that meet the identified needs and aspirations of the communities within the Borough. It is expected that all new residential development proposals demonstrate how they contribute to achieving the identified needs as set out within the Housing and Economic Development Needs Assessment and any other up to date evidence of housing need.</i></p> <p>This will enable applicants to bring forward developments that accord with more up to date evidence; this is important given the length of the new Plan period and the likelihood of change over that time.</p>	<p>The Council would not be seeking to amend Policy 6.1 with all the wording proposed by Tetlow King Planning. The Council is committed to consulting the residents of the Borough when there is a sought change in planning policy. The Council is also committed to consulting the residents of the Borough during the planning application decision making process. It is therefore felt that the addition of ‘<i>and aspirations</i>’ is not necessary.</p> <p>The Council however, will amend the final part of the policy wording to read ‘<i>...Assessment and any other up to date evidence of housing need</i>’.</p>
13/12/16	Tetlow King Planning (C/O Rent Plus)	We also recommend that reference to space standards within the policy is removed. The new (optional) technical standards introduced this year are the sole standard that may be introduced in a Local Plan policy, and should be introduced only where justified by local	Policy 6.1 currently does not have any reference to space standards. The Council will consider the use of space standards in certain circumstances where there is evidence to justify doing so, however is unlikely to implement the use of space standards in all development. The Council will take a pragmatic

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		evidence of need and an understanding of the viability implications of such a policy. The Council should review the need for this.	approach through the new Local Plan.
13/12/16	Tetlow King Planning (C/O Rent Plus)	The approach set out in <b>Policy 6.3: Affordable Housing and Starter Homes</b> is largely appropriate, and supported. To further encourage delivery of a wide range of affordable homes to meet local needs and aspirations, we ask that the policy be amended to reference the rent to buy tenure. The proposed tenure split should also reference rent to buy, noting that this tenure will bridge the needs of households who can currently afford to rent at an affordable level, but whose aspirations will be met by Rentplus homes. Such an approach would further encourage flexible responses to local need and changes in national policy.	<p>The Council acknowledges and welcomes the support of Tetlow King Planning.</p> <p>The Council would encourage the use of the Rentplus model, however does not feel it appropriate to specify the Rentplus (product) model as a specific tenure within Policy 6.3 Affordable Housing and Starter Homes. The Council will however seek to add some flexibility into the policy regarding tenure splits, which could encapsulate the Rentplus model or any other appropriate similar model.</p>
13/12/16	Tetlow King Planning (C/O Rent Plus)	<p>To support this new model in delivering affordable housing to local people the Plan should amend the definitions of affordable housing, to include definition of rent to buy alongside the other tenures, as well as the following points to recognise the importance of including rent to buy homes as part of a comprehensive response to local housing needs: <i>Affordable housing comprises affordable rented, intermediate and affordable rent to buy housing.</i></p> <p><i>The Council will:</i></p> <ul style="list-style-type: none"> <li><i>i. require residential developments to provide affordable housing which is accessible to local people in housing need;</i></li> <li><i>ii. state the threshold above which affordable housing is to be sought;</i></li> </ul>	<p>Comment noted.</p> <p>Any definition of Affordable Housing contained within the Local Plan will be consistent with the definition expressed by national government.</p>

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		<p><i>iii. state the amount of affordable housing to be provided on suitable sites above the threshold;</i></p> <p><i>iv. state the target tenure split between affordable rented, intermediate and affordable rent to buy that will be sought;</i></p> <p><i>v. allow for the negotiation of points ii-iv where viability is compromised, with the aim of maximising the overall level of affordable housing to be delivered on individual sites.</i></p> <p>These points would contribute towards boosting local affordable housing provision, as well as supporting the Government's ambition to extend opportunities for affordable home ownership.</p>	
14/12/16	Leicestershire County Council	<p>Comments relate to Policy 8.4.1. The WPA objects to this policy in its current form because it seeks to prohibit sui generis uses from being located within existing employment areas (industrial estates) within the Borough. The adopted development plan for the area includes policies which prescribe such areas as suitable for some waste management purposes and this policy would run counter to these policies. Also, within the appeal decision at Unit 1, Harrison Close (reference APP/M2460/A/12/ 2189779) the decision maker considered that some waste management operations can be employment uses regardless of their sui generis status. On the basis of this the policy and/or its supporting text should address this matter accepting that some waste management uses would be acceptable on existing employment sites.</p>	<p>Comment noted.</p> <p>Policy 8.4.1 as prescribed in the Preferred Options Local Plan document does not prohibit a waste management use within any of the existing employment sites. The policy allows flexibility to uses outside of B class uses as long as they can clearly demonstrate that the alternative use meets the criteria outlined.</p> <p>It would not be appropriate for the Council to allow all Sui Generis uses to be sited on an existing employment site, as a number of the uses prescribed within the Sui Generis use class would not be complimentary or appropriate and employment sites would not be a suitable location.</p>

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<p>14/12/16</p>	<p>Councillor Andrew Collins On Behalf of Kilby Parish Council</p>	<p>I have looked at the Preferred Options Document and would make the following comments on behalf of Kilby Parish Council:-</p> <p>a) We agree that advantage should be taken of the opportunity to develop the character of Kilby Bridge, whilst ensuring that any new development there is appropriate and small in scale.</p> <p>b) We agree with the need to protect open countryside and maintain / enhance opportunities for public access.</p> <p>c) As it is Kilby's main local shopping centre, we are supportive of measures taken to regenerate the centre of Wigston Magna.</p> <p>d) We agree with the statement in Policy ref. 4.2 that development should be focussed on existing centres.</p> <p>e) We agree with the statement in Policy 7.2 regarding appropriate levels of development.</p> <p>f) We agree with policy 19.7 as regards restrictions on development outside the Leicester Principal Urban Area.</p>	<p>The Council acknowledges and welcomes the Kilby Parish's comments.</p>
<p>15/12/16</p>	<p>Denise Taylor (Local Resident)</p>	<p>I only saw this by chance on the 14th December. Was it well advertised? No one I have spoken to knows about it. So I would suggest not. My comments are as follows: An executive summary is needed. Where is the building of new homes going to be? What infrastructure?</p> <p>An awful lot of words and no detail.</p>	<p>The Council advertised the public consultation of the Preferred Options Local Plan widely.</p> <p>The public consultation was advertised within Letterbox, which is delivered to every property within the Borough; there was an advert in the Leicester Mercury; the Planning Policy team held numerous public consultation events around the Borough; it was advertised on the Council's website and electronic advertisement boards; and, letters were sent out to every person on the Planning Policy database.</p>

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			<p>All of the events that the team held were very well attended and the number of comments submitted to the Council through the consultation was good.</p> <p>The Pre-Submission Local Plan document will be more detailed than the Preferred Options document was and will set out the number of homes and where they are to be built and will set out the level of infrastructure required to deliver growth within the Borough.</p>
15/12/16	Planning & Design Group On Behalf Of Mr Hosking	<p>This representation is made in support of the Oadby and Wigston Local Plan Preferred Options Consultation 2016, in connection with the draft planning policies listed above. This representation is made with specific reference to land to the south of Norwood House, off Cooks Lane, Wigston. A concurrent submission has been made to the Council's 'Call for Sites' consultation promoting the development potential of the site. The site is located to the south east of Wigston adjoining the Leicester Principle Urban Area (PUA). Land to the north and east of the site benefits from extant outline planning permission for a mixed-use development, including up to 450 dwellings and 2.5 hectares of employment (ref. 13/00403/OUT). Consideration of the subsequent Reserved Matters application is ongoing (ref. 16/00316/REM). It lies within the Wigston Direction for Growth Area.</p>	<p>The Council acknowledges and welcomes the support of Planning and Design Group.</p>
15/12/16	Planning & Design Group On Behalf Of Mr Hosking	<p>Firstly, it is considered that the Council's Spatial Strategy (Policy 4.2) has been robustly justified, taking into account the needs of the residential and business</p>	<p>The Council acknowledges and welcomes the support of Planning and Design Group.</p>

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		communities, pursuing sustainable development in accordance with the National Planning Policy Framework (NPPF).	
15/12/16	Planning & Design Group On Behalf Of Mr Hosking	The Spatial Strategy makes the provision for one Direction for Growth Area, on land to the south east of Wigston, to provide for new homes and local employment opportunities, as this will reinforce the role of Wigston as the Borough's main town. Accordingly, this policy is supported. It is recognised that this Direction for Growth Area is included within the current Development Plan Document: Core Strategy (2010), which is to be replaced by the Local Plan upon its adoption. This approach, therefore, acknowledging that not all new development could or should be accommodated within the Borough's urban areas and seeking to address housing need across the whole Borough, has already been tested and is considered to be sound.	The Council acknowledges and welcomes the support of Planning and Design Group.
15/12/16	Planning & Design Group On Behalf Of Mr Hosking	The Wigston Direction for Growth Area is also addressed in Section 7.5 and Policy 7.5 of the Local Plan Preferred Options. For the purposes of the Local Plan, the Growth Area is split into two phases. Cumulatively, Phase 1 and Phase 2 require a very conservative estimate of approximately 45ha to accommodate the different land uses specified by Policy 7.5. Ultimately, this will include land the south and south east of Wigston, encompassing land to the south Norwood House, off Cooks Lane, as promoted in this representation and associated Call for Sites. For the avoidance of doubt, the site is available for development	Comment noted.

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		and deliverable early within the Plan period.	
15/12/16	Planning & Design Group On Behalf Of Mr Hosking	The Council's preferred option to allocate the land to the south east of Wigston as the one Direction for Growth Area, adjoining the defined Leicester Principle Urban Area (PUA) is encouraged, acknowledging its complementary role in the continued success of the wider Borough and contributing towards meeting an identified local housing need. It is important, therefore, that the Local Plan continues to be positively prepared and that the proposed allocation can be delivered in line with the objectives of wider planning policy.	Comment noted.
15/12/16	Landmark Planning On Behalf Of Bowbridge Land	<b>Policy 4.2- (HEDNA)</b> Questions that the plan is not being 'positively prepared', as there is no data on housing figures or land allocated for housing due to work being undertaken on the objectively assessed need within the county wide strategy HEDNA across all HMA's.	The Council's Pre-Submission Local Plan document will be positively prepared and will take account of the HEDNA and other up to date evidence base.
15/12/16	Landmark Planning On Behalf Of Bowbridge Land	Once findings from HEDNA have been gathered, this may give rise to a higher requirement of housing numbers and the need for further allocations of new sites for development across the borough.  Preparation of Local Plan without any reference to housing target figures may cause the plan to be considered unsound.	If the outcomes of the HEDNA require the Council to do so, the Council will assess a number of sites across the Borough to test their suitability for residential development during the proposed Plan period up to 2036. The Council will assess all sites that have been submitted through the Call for Sites process as well as sites that have been identified within the Council's SHLAA.
15/12/16	Landmark Planning On Behalf Of	Objective 7 supported in principle, but should include objectively assessed need with regard to housing figures (pp. 47, NPPF).	Comment noted.

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	Bowbridge Land		
15/12/16	Landmark Planning On Behalf Of Bowbridge Land	Objective 8 should include new housing within land adjacent to key urban areas (Oadby, Wigston & South Wigston), not just the key centres of the borough.	Comment noted. Objective 8 will be amended to read... <i>'The focus of new housing will be in the settlements of Oadby, Wigston and South Wigston, to support the regeneration of the Boroughs town and district centres'</i> .
15/12/16	Landmark Planning On Behalf Of Bowbridge Land	<p>Support Para 4.5 in principle, however further greenfield site releases will be required to meet the borough's housing need in addition to WDFG area.</p> <p>Deferring number of greenfield site releases until releasing HEDNA undermines the plan's preparation.</p> <p>Site allocation (Land at Sutton Close should be considered as available, achievable, deliverable and suitable for greenfield land release within the borough)</p>	<p>If further greenfield release sites are required to reflect the outcomes of the HEDNA the Council will identify these within the Pre-Submission Local Plan where appropriate to do so. The Council identified areas of potential greenfield release within the Preferred Options document, these were Land between Stoughton Road and Gartree Road, Oadby; Land at Cottage Farm, Oadby; and, Land west of Welford Road, Wigston.</p> <p>Any sites submitted through the Call for Sites process or which have been identified within the Council's SHLAA will be assessed during the production of the Pre-Submission Local Plan.</p>
15/12/16	Landmark Planning On Behalf Of Bowbridge Land	<p><b>Policy 4.2 (pp. 31)</b></p> <p>Need to provide location and number of dwellings available to develop on greenfield sites which are intended to be allocated for development.</p> <p>Land at Sutton Close Road, Oadby should be released for residential development (Environmentally appropriate form of sustainable development).</p>	<p>Comment noted.</p> <p>Any sites submitted through the Call for Sites process or which have been identified within the Council's SHLAA will be assessed during the production of the Pre-Submission Local Plan.</p>
15/12/16	Landmark Planning On Behalf Of Bowbridge Land	<p><b>Policy 5.3 (pp. 40)</b></p> <p>Supports policy on design and construction (complies with para 59 of the NPPF).</p>	The Council acknowledges and welcomes Landmark Planning's comments.

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15/12/16	Landmark Planning On Behalf Of Bowbridge Land	<p><b>Policy 5.5 (pp. 46/47)</b></p> <p>Support para 5.50 of the LPPO. (Sutton Close site could fulfil this requirement by linking existing and new residents within the area).</p> <p>Para 5.50 should support the promotion of new green infrastructure as part of new development.</p>	The Council acknowledges and welcomes the support of Landmark Planning.
15/12/16	Landmark Planning On Behalf Of Bowbridge Land	<p><b>Policy 6.2 (pp. 58)</b></p> <p>Policy 6.2 (housing density) is unrealistic both in and outside urban centres. High density housing would render the plan unsound and undermine the delivery of the council's housing targets. Density should be maintained at 30 dwellings per hectare.</p>	Comment noted.
15/12/16	Landmark Planning On Behalf Of Bowbridge Land	<p><b>Policy 7.1 (pp. 66)</b></p> <p>Development site selection policy is not well considered as in town centre and development within the Leicester PUA takes precedence over the release of greenfield sites and green wedge designations.</p> <p>Assessment of SA sites indicates that Sutton Close is favourable location for housing development, despite greenfield status and potential of coalescence with existing settlements.</p>	<p>Comment noted.</p> <p>The assessment matrix for OWBC26, in Appendix 5 of the SA, recognises that the site is on greenfield land and may contribute to coalescence of settlements, as it is included within the Oadby and Wigston Green Wedge. This has been assessed via SA objective 9, against which potential significant negative effects have been identified.</p>
15/12/16	Landmark Planning On Behalf Of Bowbridge Land	<p><b>Policy 10.6 (pp. 124)</b></p> <p>The principle of Green Wedges are supported, however current Green Wedge</p>	As part of the Pre-Submission Local Plan production, the Council will be undertaking a Green Wedge review to ensure that the evidence underpinning the Green Wedge policy is robust and up to date.

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		<p>designations include land that is considered to be sustainable locations for development and does not clearly meet the objectives of green wedge designations.</p> <p>Council need to update evidence base for Green Wedge policy to ensure that it is robust and meets the tests of soundness.</p>	
15/12/16	Mary Ray & Tony Sumpter (Saffron Tree Action Group)	<p><b>Local Green Space Designations</b> We are pleased the Forward Planning Team agree that the Local Green Spaces submitted by STAG in September do fulfil the three Government criteria:</p> <ul style="list-style-type: none"> <li>• All the sites are local in character and reasonably close to the community</li> <li>• Local people have identified the areas as of particular importance to them and provided evidence of how they are demonstrably special because of their beauty, historic significance, tranquillity and richness of wildlife, and recreational value.</li> <li>• All the sites are local in character, and none are extensive tracts of land.</li> </ul>	Comment noted.
15/12/16	Mary Ray & Tony Sumpter (Saffron Tree Action Group)	<p>You have all the evidence to demonstrate compliance with those criteria in the September submission, and the previous 2013 allocation submissions, which have been carried forward as supporting evidence. There is also strong evidence of community commitment to protection of these areas over a long period. In addition, the Plan uses the term 'non-designated heritage asset' e.g. p. 118, Policy 10.4. That term applies to the</p>	<p>Through the preparation of the Local Plan the Council will be undertaking a review of its existing Landscape Character Assessment. The Council will ensure that through the Landscape Character Assessment review, the Saffron Road area will be taken account of sufficiently. The Council is aware of the history of the Saffron Road area and its importance within the Borough.</p>

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		Saffron Road area re its historical connections with the Glen Parva Grange Monsell estate, and the Leicester regiment buildings on Tigers' Road.	
15/12/16	Mary Ray & Tony Sumpter (Saffron Tree Action Group)	We understand the next stage would be discussion with landowners. It'll be important for the community, councillors, and the Greening the Borough and Place Shaping Working Groups, to be kept abreast of those discussions in order to give relevant support for the designations. Designation would be consistent with the corporate priority for Greening the Borough and the NPPF strategic priority of "climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape." (Local Plan p.11)	Comment noted.

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<p>15/12/16</p>	<p>Mary Ray &amp; Tony Sumpter (Saffron Tree Action Group)</p>	<p><b>Use of Language and the LUC Sustainability Assessment</b>          This isn't to get at the Forward Plans Team but rather to name the elephant in the room. Planning is shot through with contradictory language such as 'sustainable development'. Para 4.4. on page 29 is a perfect example. It's impossible to move from a net loss of biodiversity to achieving gains for the natural environment by pursuing development! It rides rough shod over all that's known about ecology. This is where NPPF priorities speak with forked tongue: biodiversity, the natural environment, and habitats, can only be damaged and diminished by building stuff. Not your fault, but it needs to be said. It creates a totally unfair setting where the natural environment will always lose out. That gives the Forward Plans Team the challenge of finding ways to shift the balance back in favour of protecting habitats and natural green spaces at every opportunity. And that doesn't have to be limited to those green assets that happen to have been audited! Your work and this plan are the only things that stand up for the Borough's local natural environment for the next 20 years. So we need you to be as robust as possible. Push the boundaries.</p>	<p>Comment noted. The new Local Plan will seek to protect all important landscape areas of the Borough from inappropriate development, as well as areas of important biodiversity and natural environment.</p> <p>'Sustainable development' is a widely recognised term to mean meeting the needs of the current generation, without compromising the ability of future generations to meet their own needs (known as the Bruntland definition). This is the core principle of the National Planning Policy Framework (NPPF).</p> <p>Whilst it is recognised that development may lead to direct loss of biodiversity, 'net gain' is an important principle that refers to creating overall increases in biodiversity, for example through enhancing existing habitats or habitat creation. Paragraph 9 of the NPPF states that pursuing sustainable development involves '<i>moving from a net loss of biodiversity to achieving net gains for nature</i>'. This sentiment is repeated in paragraphs 11 and 152 of the NPPF. In line with this, the Local Plan seeks to secure a net gain in biodiversity through protecting and enhancing Green Infrastructure.</p>
<p>15/12/16</p>	<p>Mary Ray &amp; Tony Sumpter (Saffron Tree Action Group)</p>	<p>The point made at 2.1 is closely related to our strong objections to the LUC SA changes to the wording of objectives SA7 and SA8 (non-technical summary p 10). It has been explained that the changed wording is to</p>	<p>Comment noted. The Council received specific advice concerning the changes to the SA Objectives and their associated assumptions prior to the commencement of the consultation period and are in agreement with LUC that the changes were necessary.</p>

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		<p>better enable monitoring. But it's a dramatic weakening of protection of the natural environment. Monitoring will only be of species specified by the County Biodiversity Action Plan, and nationally and locally designated sites. That dramatically reduces protection for the majority of natural green space throughout the Borough which is non-designated because of the limits of the Biodiversity Audit and Green Infrastructure Plan (see para 7 below). There's no record of local sites because they have simply not all been identified. The 'bar' for whether a site is designated has also been set ever higher for decades. Habitats are actually harder to monitor than green spaces. It's even worse when the policies are assessed against the objectives: in all the tables 'natural environment' disappears altogether and SA8 becomes merely biodiversity and geo-diversity. That's unacceptable. So the commitment to protect the natural environment that was in the Core Strategy has been sacrificed to the god of monitoring. It's a terrible backward step.</p>	<p>In order to make the SA Objectives more robust, focused and compliant with the SEA Regulations, LUC advised the Council to amend SA2, SA8 and to add an additional SA Objective (SA9) so that they are more able to assess the impacts of the emerging policies and site allocations in the New Local Plan. The Council is confident that the changes allow for a more rigorous assessment of the Local Plan's impact on biodiversity (SA8), access to the countryside (SA2) and impact upon the landscape (SA9).</p> <p>Please note that none of the key content of the 'old' version of SA8 has been deleted, it has just been re-ordered to better reflect the SEA Regulations. Please also note that SA8 does not focus solely on designated sites and we have included the assumption that 'development site options within the countryside or a green space could have a minor negative effect on biodiversity'.</p> <p>Green space is also considered in relation to SA2: Health and Wellbeing and SA objective 8: Landscape. SA is a strategic, high-level process that is required to assess all options in the same level of detail. Therefore SA cannot take account of detailed ecological information (and much of this is not available on a consistent basis between sites). Biodiversity issues will be considered in more detail at the planning application stage.</p>
15/12/16	Mary Ray & Tony Sumpter (Saffron Tree Action Group)	<p>What did the Forward Plans Team do to argue against this change? The previous wording, <i>'to protect and enhance the natural landscape and green spaces and provide opportunities for public access to the</i></p>	<p>Comment noted. The Council received specific advice concerning the changes to the SA Objectives and their associated assumptions prior to the commencement of the consultation period and are in agreement with LUC that the changes were necessary.</p>

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		<p><i>countryside</i> ' should be re-instated. That wording is entirely consistent with the NPPF strategic priority re protecting the environment (para 1.20). Monitoring is pointless if the definition cuts out nearly everything at local level. This is a local plan not a regional one. You can't monitor 'making homes more liveable', or 'addressing the needs of hard to reach groups', or 'promoting diversity and religious understanding' – but they're in there. There's nothing to stop the new wording for biodiversity and geodiversity as additional objectives, without losing the commitment to the natural environment and protecting and enhancing green spaces and access to the countryside. SA8 should also retain its title of 'Natural Environment' as it's more inclusive than 'biodiversity and geodiversity'. Please rectify this terrible retrograde step as its footprints are there throughout the way Core Strategy wording has been re-framed in the draft Plan, and the LUC SA.</p>	<p>In order to make the SA Objectives more robust, focused and compliant with the SEA Regulations, LUC advised the Council to amend SA2, SA8 and to add an additional SA Objective (SA9) so that they are more able to assess the impacts of the emerging policies and site allocations in the New Local Plan. The Council is confident that the changes allow for a more rigorous assessment of the Local Plan's impact on biodiversity (SA8), access to the countryside (SA2) and impact upon the landscape (SA9).</p> <p>Please note that none of the key content of the 'old' version of SA8 has been deleted, it has just been re-ordered to better reflect the SEA Regulations. Please also note that SA8 does not focus solely on designated sites and we have included the assumption that 'development site options within the countryside or a green space could have a minor negative effect on biodiversity'.</p> <p>The title 'natural environment' was altered because many of the other objectives address different aspects of the natural environment, therefore the assessment can more clearly demonstrate where different types of effect are likely to arise. For example, green space is also considered in relation to SA2: Health and Wellbeing and SA objective 8: Landscape.</p>
15/12/16	Mary Ray & Tony Sumpter (Saffron Tree Action Group)	<p><b>Local Green Spaces and Green Infrastructure should be in Chapter 10: Protected Places</b>          We think the current placing in Chapter 5 on Healthy Communities is wrong conceptually. This is for several reasons:</p>	<p>Comments noted.</p> <p>Local Green Spaces and Green Infrastructure will be moved to Chapter 10 of the new Local Plan. The SA assesses each policy against the baseline, in line with the agreed assumptions presented in Appendix 4 of the SA Report. The assessment does</p>

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		<ul style="list-style-type: none"> <li>• Chapter 10 clearly states stronger commitment to protection. The heading ‘Protected Places’ strengthens the message of “...conservation and enhancement of the natural and historic environment, including landscape.” (NPPF)</li> <li>• Chapter 10 is a much more appropriate conceptual ‘fit’ than ‘Healthy Communities’. Neither Local Green Spaces, nor Green Infrastructure fit alongside, for example, Creating a Skilled Workforce.</li> <li>• Placing in Chapter 10 gives equal treatment with Green Wedges, Countryside, Conservation Areas, and Landscape Character. Stronger protection is needed because being an urban borough, ‘presumed development’ puts additional pressure on the natural and historic environments.</li> <li>• In terms of ecology it makes no sense to separate Green Infrastructure and Local Green Spaces from Biodiversity and Geo-diversity or Landscape as at present.</li> </ul> <p>The LUC sustainability assessment of Local Greenspace, in its current position as Policy 5.7, illustrates how placing it in ‘community well being’ has set the wrong conceptual framing. In Table 9 on p 21 of the non-technical summary LUC only view Local</p>	<p>not depend on the location of the policy within the Local Plan. The assessment matrix of Policy 5.7, as presented in Appendix 8 of the SA report, has concluded that this policy is likely to have minor positive effects on SA objectives 7 (historic environment), 8 (biodiversity) and 9 (landscape), therefore it is incorrect that this has only been considered in ‘community terms’.</p>
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		<p>Green Spaces in terms of their contribution to SA5 and SA6 – social inclusion and integrated communities. The same appears at page 744/745 of the technical SA. (Ironically, sport scores as a positive contribution to landscape!) Only viewing the positive contributions of Local Greenspace in ‘community terms’ devalues the environmental and historical significance of these areas. The community has fought to protect these Local Green Spaces because they are crucial parts of our historic and natural environment and landscape (SA 7, 8, and 9). So those objectives need to be given due significance as they are the most important reasons for protection.</p>	
15/12/16	Mary Ray & Tony Sumpter (Saffron Tree Action Group)	<p><b>Corporate Priorities (p 9-10)</b>          We’re aware it’s unlikely to make any difference – but we view the commitment to free shoppers’ parking and weekly bin collection as a hostage to fortune – especially as it’s til 2036. Free parking doesn’t make ecological sense – we should be paying for car use. Residents haven’t actually been asked whether they agree with this priority for spending.</p>	Comment noted.
15/12/16	Mary Ray & Tony Sumpter (Saffron Tree Action Group)	<p>Re Greening the Borough – we are pleased this is included as a priority. The priority would be strengthened by including explicit commitment to invest in and encourage tree planting, as well as prioritising tree protection. We understand John Boyce and David Carter will give the Forward Plans Team policy confirmation on this, as chairs of the Greening the Borough and Place Shaping</p>	<p>Comment noted.</p> <p>Where possible the new Local Plan will encourage the provision of tree planting in appropriate locations.</p>

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		working groups. Both confirmed to us they will do so before the 16 <sup>th</sup> .	
15/12/16	Mary Ray & Tony Sumpter (Saffron Tree Action Group)	There's very little reference to encouraging cycling. It could be in various sections, especially sustainable transport. We're aware highways is a County responsibility, but the Borough should be working in partnership to maximise investment in safe cycling, and commitment to that should have a higher profile. The Greening the Borough and Place Shaping working Groups should be supporting such initiatives – and not just in new developments. Surely there are National, and County Policies re developing cycling that should be cited in section 8.4.2, together with a local commitment? It's about much more than just cycle parking as in Policy 8.4.2.	The Council is committed to the encouragement of cycling and other forms of sustainable transport modes. As far as possible the new Local Plan will encourage cycling in its policies and supporting wording.
15/12/16	Mary Ray & Tony Sumpter (Saffron Tree Action Group)	<b>Green Infrastructure Policy wording is weaker than in the Core Strategy</b> We understand that presumed development sets a requirement for the Plan to give priority to managing development. However, that needs to be balanced by maintaining the strength of protection for green infrastructure as clearly as possible. The new policy 5.5, p 47, is weaker than Core Strategy Policy 5, p.59. The Plan Policy 5.5 opens with a reference to development in the first sentence. That weakens the "... conservation and enhancement of the natural and historic environment, including landscape." (NPPF) We think the following re-ordering of the wording would make the policy stronger.	The wording of the Policy 5.5 green Infrastructure will be amended to better reflect the wording expressed within the National Planning Policy Framework.

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		<p><i>Green Infrastructure assets will be protected, managed and where necessary enhanced by:</i></p> <ul style="list-style-type: none"> <li>• <i>Protecting and enhancing Green Infrastructure assets and creation of new multi-functional areas of green space;</i></li> <li>• <i>Seeking opportunities to link fragmented habitats, protect vulnerable habitats and integrate biodiversity within communities;</i></li> <li>• <i>Not permitting development that compromises the integrity of the overall Green Infrastructure networks;</i></li> <li>• <i>Requiring that all new development must be designed to protect and enhance existing Green Infrastructure in the local area;</i></li> <li>• <i>Managing development to secure a net gain in Green Infrastructure</i></li> <li>• <i>Using developers contributions to facilitate improvements to their quality and accessibility;</i></li> <li>• <i>Working in partnership to enhance the value of Strategic Green Infrastructure corridors that are also of significance outside the Borough, such as the Grand Union Canal and River Sence.</i></li> </ul>	
15/12/16	Mary Ray & Tony Sumpter (Saffron Tree Action Group)	<p>In addition to the weaker wording of Policy 5.5, there are places throughout the draft Plan where wording on green infrastructure has been weakened in comparison to the Core Strategy e.g.</p> <ul style="list-style-type: none"> <li>• Issues and Challenges in Core Strategy (p.26) refers to: <i>“The quality</i></li> </ul>	<p>The wording referred to within the comments will be reviewed and strengthened where there is need to do so. The new Local Plan will reflect the wording set out within national policy and guidance.</p>

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		<p><i>of the built environment</i>  <i>Protection and enhancement of green infrastructure”</i></p> <ul style="list-style-type: none"> <li>• Issues and Challenges in Plan (p.22) refers to: <i>“Protect and enhance natural and built environment assets”</i> Including ‘and built’ weakens the commitment to protecting green assets. Better to keep two separate references as in the Core Strategy. The same combination of ‘natural and built environment’ occurs in outcome 7 in the grey box on p.25 – there’s no need to include ‘built’.</li> <li>• Spatial Objectives in the Core Strategy (p.27) give stronger commitment to protecting and enhancing green infrastructure than the Vision and Outcomes in the Plan, pp 23 – 25.</li> <li>• Spatial Objective 12 in the Strategy (p.33) is stronger than Objective 2 in the Plan (p.26)</li> <li>• Objective 3 (p 26) should include Local Green Spaces in the heading, and a separate bullet point: <i>“To protect and enhance Local Green Spaces by preventing development on these natural spaces identified as of importance to the local community for their beauty, historic significance, tranquillity and richness of wildlife, and recreational value.”</i></li> <li>• P.32, Policy 4.2 -the reference to Green Infrastructure in the</li> </ul>	
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		penultimate bullet point shouldn't be in brackets! Putting brackets always renders something of less importance. Please remove the brackets so it's of equal importance with the rest of that bullet point.	
15/12/16	Mary Ray & Tony Sumpter (Saffron Tree Action Group)	<b>Landscape and Character (p.127)</b> The Landscape Character Assessment is currently one of the strongest evidence documents for the Saffron Road area of South Wigston, and the Railway Triangle. It's really important that the proposed update doesn't weaken the protection that the 2005 Assessment currently offers. There are plenty of references throughout pages 4/7 – 4/14 to mature tree cover, the important green corridor of townscape and biodiversity value, green spaces, low density housing, and clear historic connections with the open parkland of Glen Parva Grange, and with the military presence with the TA headquarters as perhaps the finest building in South Wigston. The Policy recommendations to maintain the tree cover (SW (ii)1), open spaces (SW(ii) 2), and Frontages to Saffron Road (SW(ii) 3) are of particular importance. The update could actually strengthen protection of the character of the area by making specific reference to preventing infill development through break up of large gardens in Saffron Road.	Through the preparation of the Local Plan the Council will be undertaking a review of its existing Landscape Character Assessment. The Council will ensure that through the Landscape Character Assessment review, the Saffron Road area will be taken account of sufficiently. The Council is aware of the history of the Saffron Road area and its importance within the Borough.
15/12/16	Mary Ray & Tony Sumpter (Saffron Tree Action Group)	We are pleased that the Council's Arboriculturalist will have an integral role in the update of the Landscape Character Assessment (LCA). His specialist knowledge	All subject matter experts within the Council will be consulted when updating the Landscape Character Assessment and the new Local Plan.

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		<p>will be an important part of establishing accurate evidence of the character of the various areas. The process of updating the LCA is also the logical vehicle for developing a Tree Strategy with a clear overview of the publicly and privately owned treescape in the Borough, area by area. That can then inform the actions that will be needed to protect and enhance tree assets through further protection, planting, community engagement, and education – in line with the corporate Greening the Borough policy.</p>	
<p>15/12/16</p>	<p>Mary Ray &amp; Tony Sumpter (Saffron Tree Action Group)</p>	<p>The Landscape Character Assessment highlights the Railway Triangle as having, “..... <i>the potential to be the core element of the network of green corridors within South Wigston and the wider district.</i>” (Policy Recommendation SW(iii) 1) This site is no longer designated for employment use and was a SINC (Site of Importance for Nature Conservation). At present the Railway Triangle isn’t explicitly mentioned in the Plan. It has been submitted as a Local Green Space. In our view it should also be explicitly mentioned for its nature conservation importance – probably in the section on Green Infrastructure (para 5.48, p. 46) as an example of a Local Wildlife Site. That’s especially important as it’s an example of an important green infrastructure asset that doesn’t feature in the Green Infrastructure Plan or the Biodiversity Audit. In addition, if Railtrack are obstructive to Local Green Space designation, the Borough will need</p>	<p>Comments acknowledged and will be considered when updating the Landscape Character Assessment.</p>

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		protection in place through identifying the biodiversity and geodiversity importance of the site clearly in the Local Plan.	
15/12/16	Mary Ray & Tony Sumpter (Saffron Tree Action Group)	<p><b>Biodiversity Audit and Green infrastructure Plan don't cover the whole of the Borough.</b></p> <p>The Local Plan needs to make explicit that the environmental evidence isn't comprehensive for the whole Borough. The Forward Planning Team have been clear that the 2005 ESL Habitat and Biodiversity Audit didn't include any assessment of South Wigston, as the focus was on possible areas for development. Other areas of the Borough will also have been left out. The 2016 update of the Biodiversity Audit has again focussed on parts of the Borough considered for housing allocation. The 2009 Green Infrastructure Plan had mistakes that were partially corrected in the 2012 version.</p>	The extended Phase one Habitat Survey for the Borough is being completed presently and will inform the Final Submission draft of the Local Plan. The survey is Borough wide and will assess key sites for their habitat and biodiversity value.
15/12/16	Mary Ray & Tony Sumpter (Saffron Tree Action Group)	<p><b>The draft Plan still refers to the 2009 version – that needs to be corrected throughout.</b></p> <p>The 2012 version still doesn't credit the significant green assets of the Saffron Road area of South Wigston – because it wasn't part of the Biodiversity Audit. South Wigston has veteran trees; ancient hedgerow; small pockets of woodland - confirmed by Charles Cuthbert from the Forestry Commission; ancient grassland - Railway triangle; protected species – bats, slow worms, and marbled white butterfly; and 10 bird species on the red and amber lists of Conservation</p>	<p>The extended Phase one Habitat Survey for the Borough is being completed presently and will inform the Final Submission draft of the Local Plan. The survey is Borough wide and will assess key sites for their habitat and biodiversity value.</p> <p>Through the new Local Plan process the Green Infrastructure Plan will be reviewed and amended as necessary. The document will form part of the evidence base for the new Local Plan.</p>

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		<p>Concern. None of this is cited in the Green Infrastructure Plan or the Biodiversity Audit. Para 1.28 (p 13) implies that the baseline information is comprehensive, but it isn't. That needs to be clarified on page 13. Other places where the limitations could be clearer include:</p> <ul style="list-style-type: none"> <li>• Para 5.49, p 46 – The current wording cites 'detailed' compilation – but it wasn't because it was informed by the incomplete Biodiversity Audit. Change to: <i>"The Green Infrastructure Plan (2012) provides a compilation of some components of Green Infrastructure within the Borough, but is not a fully comprehensive baseline. Much of the Borough's green infrastructure assets exist on non-designated sites. However the value of these assets will be appropriately considered in planning decisions, commensurate with their relative ecological status. The Green infrastructure Plan identifies...."</i></li> <li>• Para 10.2, p 110 – add a first sentence to make clear that the Biodiversity Audits didn't cover the whole Borough: <i>"The Council's Phase One Habitat Surveys of 2005 and 2016 only assessed and specified those areas of the Borough being considered for possible Housing Allocations so it is not a fully comprehensive baseline of the whole of the Borough. Much of the biodiversity...."</i></li> </ul>	
15/12/16	Mary Ray & Tony Sumpter (Saffron Tree	<p><b>Integrate Policies more strongly by cross-referencing through the whole document</b> References to development appear</p>	<p>Comments noted. Consideration will be given to stronger integration of</p>

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	Action Group)	<p>throughout the Plan – understandably given ‘presumed development’ and that the document is intended to show how development will be managed. However, when it comes to environmental issues several policies appear only once. The Plan would be a more cohesive document if environmental priorities and policies are cross-referenced in more places throughout the document. We won’t attempt to make comprehensive suggestions, but a few examples may be helpful:</p> <ul style="list-style-type: none"> <li>• Corporate priority to protect trees (p.10) only appears as the last sentence in Policy 10.1. It needs to be strengthened to include commitment to planting. There are various other places where references to both protecting and planting trees could be added. E.g. P.22 in bullet points on natural open spaces; P35 on health and well being - could include a paragraph on respiratory disease and air quality and the contribution of trees and green spaces to mitigating air pollution; Para 5.25 (p 39) could include reference to planting trees; Policy 5.3 could be stronger on protecting and planting trees and providing green spaces.</li> <li>• Local Green Spaces could be more frequently cross referenced e.g. p.21, in second bullet point; in para 5.43 or 5.44 p 45 in the list of examples of green infrastructure; in the section on</li> </ul>	policies throughout the document.
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		<p>biodiversity and geodiversity.</p> <ul style="list-style-type: none"> <li>The various housing development policies in Chapter 7 don't currently make explicit reference to the Green Infrastructure Policy, or the corporate priority to protect and plant trees. Reliance on the blanket statement 'take into account all other relevant policies within this Local Plan' misses the chance to highlight the Council's commitment to protect and enhance green infrastructure and protect and plant trees. There also needs to be explicit reference to 'Creating new green infrastructure corridors' in Chapter 7 Policies – otherwise it simply won't happen.</li> </ul>	
<p>15/12/16</p>	<p>Mary Ray &amp; Tony Sumpter (Saffron Tree Action Group)</p>	<p><b>Use South Wigston examples</b>          There has been a consistent pattern for many years of using Oadby almost exclusively for examples of green infrastructure assets. The Plan needs to rectify that bias by also using examples from Wigston and South Wigston. Granville Road in Wigston is a good example of a small haven of mature trees in Wigston which should be referenced appropriately at least once. The Saffron Road area of South Wigston (Landscape Character Assessment area SW(ii)) needs to be cited in a few places. E.g.</p> <ul style="list-style-type: none"> <li>p.20 para 2.35 - suitable place to mention the trees and Local Green Spaces along Saffron Road and in the ex-army site in South Wigston. That should include a cross reference to</li> </ul>	<p>Comments noted. Consideration will be given to using examples from across the Borough and not just Oadby in the Pre Submission draft of the Local Plan.</p>

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		<p>the chapter where Local Green Spaces are defined – just as currently for Green Wedges in para 2.34. We’ve already argued that Local Green Spaces should be in Chapter ten.</p> <ul style="list-style-type: none"> <li>• P 62, Policy 6.5 re Infill Development – give Saffron Rd as example in the penultimate paragraph. Although the LCA recommends maintaining tree cover, open spaces, and Saffron Road frontages it failed to identify the need for protection from infill development by break up of large gardens.</li> </ul>	
15/12/16	Mary Ray & Tony Sumpter (Saffron Tree Action Group)	<p><b>Miscellaneous</b> Unclear why Policy 5.1 says permission for development won’t be granted for new residential development unless the impact on education costs has been addressed by the developer. But Policy 5.2 only talks about ‘seeking contributions’ for health provision– which is much weaker. That policy also still refers to the primary care trust – which no longer exists. The relevant authority is currently the Clinical Commissioning Group. Surely the Borough needs to liaise with the CCG to strengthen the requirement on developers re suitable contribution to health provision?</p>	<p>Comments noted.</p> <p>Any discrepancies within policies will be revised and updated where necessary to do so.</p> <p>Primary Care Trust will be updated to reflect its new title of Clinical Commissioning Group.</p>
15/12/16	Mary Ray & Tony Sumpter (Saffron Tree Action Group)	<p>Para 10.1, p.110: Will there be a map of the important biodiversity and geodiversity sites in the Borough? Since this policy deals with landscape features, surely they need to be listed or will it be that the updated LCA will</p>	<p>Comments noted.</p> <p>All designated and allocated areas or sites will be mapped through the new Local Plan production process.</p>

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		need to specify features such as hedgerows etc? The Biodiversity Audit isn't comprehensive enough to be used as an audit of biodiversity and geodiversity. The Railway Triangle, veteran trees, ancient hedgeline, and protected species in this area are examples of important features that need explicit identification.	
15/12/16	Mary Ray & Tony Sumpter (Saffron Tree Action Group)	Policy 10.1 second para should include 'natural green space' in the list of valued features. There is also no mention of creating new green infrastructure corridors – it has to be specified or there really is no chance of achieving connectivity. There's also that huge NPPF inspired misuse of language: you cannot enhance biodiversity and geodiversity by building stuff. Nor can you compensate loss of habitat by mitigation elsewhere. By putting the wording in, it errs on letting the damage happen instead of stopping it. It's very worrying that heritage assets in Policy 10.4 get stronger protection than biodiversity and geodiversity. 10.4 includes the following final statement: <i>'Where development is likely to have a significant adverse impact on designated heritage assets and their settings and cannot be avoided or they cannot be preserved in situ, the development will not be permitted, unless there are substantial public benefits.'</i> How come cultural and historic assets get this level of protection, but natural green spaces, biodiversity and geodiversity don't?	Comment noted.  The wording for natural assets will be made commensurate to that of heritage and historic character where relevant to do so.
15/12/16	Mary Ray & Tony Sumpter	Policy 10.1 Note that there isn't a Tree Strategy as yet. That isn't to suggest the	Comments noted.

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	(Saffron Tree Action Group)	wording should come out, but rather to refer back to the comments at 6.2. above, that it makes sense for it to be developed, in collaboration with Henry, as part of the LCA update.	
15/12/16	Mary Ray & Tony Sumpter (Saffron Tree Action Group)	Policy 10.4, p 118: We gather the Council is preparing an update of significant local buildings. That should include carrying forward the Significant Local Buildings Schedule. In the case of South Wigston, that means including: The Cottage and North Lodge on Saffron Road – which were the original gate houses of the Glen Parva Grange estate; and Victorian buildings on the North side of Tigers’ Road – the TA, Service Master building, and Gate house - which have both individual and group value.	Comments note and these buildings will be considered for inclusion on the Significant Local Buildings List.
15/12/16	Pegasus Group On Behalf Of Wheatcroft Properties Ltd	<p>Policy 7.2 proposes the definition of a Village Envelope for Kilby Bridge and advises that the Council will consider small scale development proposals within the defined envelope, with any residential development delivered at 30 dwellings per hectare. The policy sets out objectives of the Village Envelope, including delivery of residential developments that will provide a range of housing types, unit sizes ad tenures. Appendix 1 to the Preferred Options document shows the extent of the proposed Village Envelope.</p> <p>Wheatcroft Properties owns Inglenuck, an existing residential property to the west of Welford Road. The proposed definition of a Village Envelope is supported. The extent of</p>	The Council acknowledges and welcomes the support of Pegasus Group.

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		the Village Envelope as shown in Appendix 1, including Inglenuck is a logical definition of the extent of the built up area of the settlement.	
15/12/16	SSA Planning On Behalf Of Kentucky Fried Chicken (KFC)	<p>The reference in Policy 5.2 to managing the location of hot food takeaways, particularly in deprived communities and local areas of poor health does not provide the clear indication of how a decision maker should react to a development proposal, as required by paragraph 154 of the National Planning Policy Framework.</p> <p>Furthermore, because it is unclear what the policy would actually mean in practice, specifically where hot food takeaways would or would not be permitted, it will be impossible to demonstrate that the plan would be sound by applying the tests at paragraph 182 of the National Planning Policy Framework.</p>	Comment noted. The Council will consider rewording Policy 5.2 to ensure that it better reflects the policy and guidance set out in the National Planning Policy Framework.
15/12/16	Oadby Civic Society	<p><b>Page 76. Policy 7.1: Housing Allocations</b> Town Centre Development Opportunities. Reference is made to “Any residential development proposed within the town centre of Wigston or Oadby should be in conformity with the relevant town centre masterplan and local Development Orders”.</p> <p>Since the Oadby LDO was refused by the Planning Committee the wording should read “.....Oadby town centre masterplan excluding Brooksby Drive/East Street car park land”</p>	<p>The Town Centres Area Action Plan is a current and up to date development plan document. The Council is seeking to retain the allocations within the centres of both Oadby and Wigston.</p> <p>Local Development Orders are a tool to bring forward development; they are not a tool for allocating or de-allocating land. Local Development Orders essentially grant planning permission for a site and make the sites more attractive to the development industry.</p>
15/12/16	Oadby Civic Society	<b>Page 27. Objective 8: A Balanced housing Market.</b>	The Council has to actively allocate and identify land for housing (amongst other uses) to ensure that it

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		Whilst we understand the Objective we have concerns as to how the land would be provided in Oadby bearing in mind the LDO referred to above.	complies with national policy and guidance. Whilst there may be need to allocate greenfield sites within the Local Plan for housing, national policy and guidance seeks to concentrate development within existing sustainable locations.
15/12/16	Oadby Civic Society	<b>Page 28. Objective 10: An Accessible Borough.</b> There is nothing later in the Document relating to improved access to Wigston, the principle Town Centre.	Objective 10 will be amended to reflect improved accessibility to not only Wigston, but Oadby and South Wigston. It will particularly mention improved public transport links between each of the settlements also.
15/12/16	Oadby Civic Society	<b>Page 38 paragraph 5.19 ----Bullet point 6</b> Add "be attractive and of good Architectural quality." <b>Page 40. Policy 5.3: High Quality Design and Construction.</b> Add to --- i. "respecting existing local character.....with their own distinct identity and good Architectural quality"	Paragraph 5.19 bullet 6, will be amended to reflect the comment made. Policy 5.3 bullet i, will be amended to reflect the comment made.
15/12/16	Oadby Civic Society	<b>Page 116/117. Policy 10.3: Sustainable Drainage and Surface Water.</b> Should not ALL schemes involving hard standing and driveways be to SuDs Specification be they new developments or a change to existing.	While all development would be encouraged to incorporate sustainable drainage, Policy 10.3 is in line with the requirements of The Flood and Water Management Act 2010.
16/12/16	Montagu Evans On Behalf Of University Of Leicester	<b>Chapter 2 – Spatial Portrait</b> We welcome the statement within the draft LPPO (at paragraph 2.27) which recognises the University as a major land user and employer and catalyst for inward investment. Within the borough, the University provides dedicated student accommodation, conferencing and sports facilities, which are used not only by the University but also by the local community. This paragraph also recognises the University's " <i>plans to continue</i>	The Council acknowledges and welcomes the support of Montagu Evans.

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		<i>improving and expanding its facilities and outdated accommodation”.</i>	
16/12/16	Montagu Evans On Behalf Of University Of Leicester	The above statement reflects the University’s continuing review of its existing facilities and enables the possibility for future plans to bring forward investment in its campus facilities in the coming years. We would welcome opportunities to discuss a site specific policy which promotes development of the University sites.	The Council is always keen to meet with key stakeholders within the Borough.
16/12/16	Montagu Evans On Behalf Of University Of Leicester	<p><b>Chapter 5 – Healthy Communities</b> We support the idea that education and training has a pivotal role in reducing unemployment and making the local economy more flexible. As stated above, the University of Leicester plays an important part of the economy for Leicester and the surrounding areas.</p> <p>The University is committed to working in partnership with the Borough Council and Leicestershire County Council to ensure the skills, learning and educational needs of the Borough are met. We welcome the Council’s proposals to improve the education and skills of its residents, as set out in Policy 5.1 (Creating a Skilled Workforce).</p>	The Council acknowledges and welcomes the support of Montagu Evans.
16/12/16	Montagu Evans On Behalf Of University Of Leicester	<p><b>Chapter 6 – Housing Delivery</b> The 2011 Census shows that 40,013 of Leicester’s adult population were a full-time student at the time of the census which equates to 17% of the total workplace population (242,232). Leicester’s two universities had between them over 30,500 students enrolled for full-time study in</p>	The Council acknowledges and welcomes the support of Montagu Evans.

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		<p>2014/15 according to the Higher Education Statistics Agency (HESA). Just over 7,000 more students were enrolled for part-time study.</p> <p>The accommodation needs of undergraduate, postgraduate, and key workers/staff are all different and need to be addressed individually. Further, adequate provision of student accommodation could have a significant beneficial impact on meeting housing need by freeing up properties currently under used, whilst also encouraging vibrancy in communities. This is supported within the National Planning Practice Guidance (NPPG).</p> <p>Many university students live in halls of residence, either purpose built or university-owned accommodation (including the campus at Oadby), but there are not enough places in halls of residence to accommodate all students. Most students not living in the above will be living in private rented accommodation. We would therefore support the emerging Policy 6.1 (Housing Choices) which specifically supports the development of student halls of residence that meets identified need and is proposed in sustainable locations.</p>	
16/12/16	Montagu Evans On Behalf Of University Of Leicester	<p><b>Chapter 7 – Allocations and Regeneration Opportunity Areas</b></p> <p>We welcome the Council’s continued support of the general principle of the enhancement of the Oadby campus and note the support</p>	The Council acknowledges and welcomes the support of Montagu Evans.

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		for the preparation of a long term framework for its future development, as identified in paragraph 7.28 of the draft LPPO. The University is committed to investment in their Oadby campus towards further education, skills, enterprise and academic growth.	
16/12/16	Montagu Evans On Behalf Of University Of Leicester	However, investment in the campus could be undertaken on a piecemeal basis or through the development and/or redevelopment of individual buildings. Policy 7.6 refers to regeneration schemes and large scale developments requiring the approval of masterplans and development briefs. However, clarity and confirmation is required as to whether these would be required when development on sites such as the Oadby campus comprises works which are not considered to represent 'large scale change'.	The Council would only require the development of masterplans or development briefs on sites where large scale change is proposed. Proposals that seek small scale change would not require development of such.  The Council however, would encourage the University of Leicester to produce a masterplan or development brief for all its sites within Oadby where change is planned in the future to ensure that piecemeal development does not occur.
16/12/16	Montagu Evans On Behalf Of University Of Leicester	We assume that in those cases, the requirement for a masterplan or development brief as stated under emerging Policy 7.6 would not be applicable and the other emerging policies within the LPPO would be considered instead. The University is committed to liaising and consulting with the Borough Council in relation to any future developments.	The Council is always keen to meet with key stakeholders within the Borough.
16/12/16	Montagu Evans On Behalf Of University Of Leicester	<b>Chapter 10 – Protected Places</b> The Stoughton Pitches, located in the very north of the Borough, are used by the University for sport and recreation, and are located within the identified 'green wedge', which protects important areas of open land. December 16, 2016 Page 4	The wording will be amended to:  <i>“Due to the open and undeveloped nature of the Green Wedges, the Council will only allow acceptable uses that are consistent with the following.</i> <ul style="list-style-type: none"> <li>• <i>Agriculture, horticulture and allotment;</i></li> <li>• <i>Outdoor leisure (and related indoor leisure),</i></li> </ul>

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		<p>Corresponding Policy 10.6 (Green Wedges) states that:  <i>“Due to the open and undeveloped nature of the Green Wedges, the Council will only allow acceptable uses that are consistent with the following.</i></p> <ul style="list-style-type: none"> <li>• <i>Agriculture, horticulture and allotment;</i></li> <li>• <i>Outdoor leisure, recreation and sporting facilities;</i></li> <li>• <i>Forestry and bodies of water;</i></li> <li>• <i>Footpaths, bridleways and cycle ways; and,</i></li> <li>• <i>Burial grounds.”</i></li> </ul> <p>The majority of the University’s existing recreation and sporting facilities are located in Oadby, either on the campus or as part of the Stoughton Sports Pitches, including both indoor and outdoor facilities.</p> <p>Whilst the emerging policy allows outdoor leisure, recreation and sporting facilities to be developed, we consider that in some instances, indoor leisure facilities would also be appropriate, including within the Green Wedge by virtue of their complimentary relationship with the outdoor pitches.</p> <p>We believe that indoor sport development can meet the objectives of green wedges. It would assist in maintaining Stoughton as a location for outdoor sport and preserving the Green Wedge as a recreational resource.</p> <p>The merging of settlements would not be an issue and the ‘green lung’ is maintained. We</p>	<p><i>recreation and sporting facilities;</i></p> <ul style="list-style-type: none"> <li>• <i>Forestry and bodies of water;</i></li> <li>• <i>Footpaths, bridleways and cycle ways; and,</i></li> <li>• <i>Burial grounds.”</i></li> </ul>
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		therefore request the second bullet point of Policy 10.6 to be amended to read “ <i>outdoor and indoor leisure, recreation, sporting and associated facilities</i> ”.	
16/12/16	Montagu Evans On Behalf Of University Of Leicester	<b>Closing</b>  Generally, we are supportive of the draft LPPO. The comments and recommendations made are highlighted to provide clarity on the status of the document but also to allow flexibility, thus ensuring the overall objectives of the Plan are achievable.	The Council acknowledges and welcomes the support of Montagu Evans.
16/12/16	Pegasus Planning On Behalf Of Barratt Homes & David Wilson Homes	<b>Housing Land Requirement</b> The Preferred Options consultation document includes a Local Plan Position Statement which explains that the Preferred Options document sets out the Council's preferred options for bringing forward sustainable development over the period 2016 to 2036. Reference is made to the joint work currently being undertaken by the Leicester and Leicestershire Housing Market Area (HMA) authorities to bring forward a Housing and Economic Development Needs Assessment (HEDNA) that will replace the Strategic Housing Market Assessment (SHMA) 2014. The Position Statement advises that as the HEDNA is still in preparation, the Council has not committed to a Plan period target within the consultation document. The Statement explains that the document introduces a flexibility to accommodate a higher or lower target than set out in the Core Strategy, should evidence suggest the need to do so.	Comment noted.
16/12/16	Pegasus	Whilst the Council's position is understood,	Comment noted.

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	Planning On Behalf Of Barratt Homes & David Wilson Homes	given that the HEDNA is yet to be published, it is difficult to comment meaningfully on the Preferred Options without an understanding of the likely levels of growth to be accommodated over the plan period.	
16/12/16	Pegasus Planning On Behalf Of Barratt Homes & David Wilson Homes	It is understood that the HEDNA will be based on the latest 2014 Sub National Household Projections. When compared with the 2012 Sub National Household Projections, the latest projections show an increase in households in Leicestershire over the period to 2037. The latest projections also show significantly higher household growth in Leicester City. The general picture is one of increased growth across the HMA. This is made before any adjustments are made to address economic issues and issues of affordability in accordance with the National Planning Practice Guidance (NPPG).	Comment noted.  The Council will take account of the outcomes of the HEDNA and will feed the outcomes into the Pre-Submission Local Plan document.
16/12/16	Pegasus Planning On Behalf Of Barratt Homes & David Wilson Homes	For Oadby and Wigston, the 2014 Sub National Household projections show a 12% increase in households over the period 2014 to 2037 compared with a 7.7% in 2012 based projections. The significantly higher household increase for Leicester is one that could raise issues of unmet need that will need to be addressed by the HMA authorities through Duty to Cooperate. It is therefore considered that it is likely that the HEDNA will require the HMA authorities, including Oadby and Wigston, to plan for higher levels of housing development over the plan period to 2036.	Comment noted.
16/12/16	Pegasus	<b>South-East Wigston Direction for Growth</b>	Comment noted.

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	Planning On Behalf Of Barratt Homes & David Wilson Homes	<p><b>– Phase 2</b></p> <p>The adopted Core Strategy identified a Direction for Growth to the South-East of Wigston to provide some 450 new homes. The Key Diagram shows the Direction for growth extending between Newton lane and Welford Road. Barrett and David Wilson Homes worked constructively with the Council to support the identification of the Direction for Growth in the Core Strategy, including attendance at the Core Strategy Examination. In supporting the Direction for Growth, the Core Strategy Examination Inspector noted that the Direction for growth was likely to be needed to cope with further growth after 2026. Outline planning permission for 450 dwellings south of Newton lane and 2.5 hectares of employment land off Welford road was granted in February 2016.</p>	
16/12/16	Pegasus Planning On Behalf Of Barratt Homes & David Wilson Homes	<p>Paragraph 4.5 of the Preferred Options Consultation advises that the Council will allocate one greenfield Direction for growth area to the south and east of Wigston. Policy 4.2, Spatial Strategy, makes provision for the Direction for Growth as part of the Council’s spatial strategy over the plan period. Policy 7.1, Housing Allocations advises that the Council will initially focus residual housing requirement within the Direction for Growth area in Wigston. Policy 7.5 of the Preferred Options provides further guidance on the proposed Direction for Growth.</p>	Comment noted.
16/12/16	Pegasus Planning On Behalf Of	<p>Paragraph 7.20 notes that the Direction for Growth area was originally defined in the Core strategy and that a scheme for 450</p>	Comment noted.

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	Barratt Homes & David Wilson Homes	homes was granted permission in 2016, referred to as Phase 1. Paragraph 7.22 states that through the local Plan the Council is proposing to allocate further land within the Direction for Growth to accommodate further new homes and employment as Phase 2.	
16/12/16	Pegasus Planning On Behalf Of Barratt Homes & David Wilson Homes	Through the development of Phase 1 and 2 of the Direction for Growth, the Council is expecting the delivery of approximately 1,000 homes and 5 hectares of employment land. The third paragraph of the Policy refers to Phase 2 providing a minimum of 550 new homes, whereas the first bullet to paragraph four refers to the provision of a minimum of 500 new homes. The Policy needs to be consistent in terms of the number of dwellings proposed for Phase 2 of the Direction for Growth.	The Council will ensure consistency with the wording of the Pre-Submission Local Plan document. In this instance the consistent wording is 'a minimum of 550 new homes'.
16/12/16	Pegasus Planning On Behalf Of Barratt Homes & David Wilson Homes	There is the potential to accommodate more than 550 homes on land under the control of Barrett Homes and David Wilson Homes within the Direction for Growth to the east of Welford Road. There is also potential for a limited expansion of the Direction for growth to the east of Welford road. There is also potential for a limited expansion of the Direction for Growth north of Newton Lane if additional housing numbers are required. In addition to the required housing, policy 7.5 sets out the requirements for Phase 2 including; <ul style="list-style-type: none"> <li>• At least 2.5 hectares of employment land;</li> <li>• Site access from Welford Road;</li> </ul>	Comment noted.  If the outcomes of the HEDNA require the Council to do so, the Council will assess a number of sites across the Borough to test their suitability for residential development during the proposed Plan period up to 2036. The Council will assess all sites that have been submitted through the Call for Sites process as well as sites that have been identified within the Council's SHLAA.

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		<ul style="list-style-type: none"> <li>• A link road through the site from Welford Road to Newton Lane.</li> <li>• A new primary school;</li> <li>• A new local centre;</li> <li>• New community hall and outdoor sports space.</li> </ul>	
16/12/16	Pegasus Planning On Behalf Of Barratt Homes & David Wilson Homes	The proposals to allocate Phase 2 of the Direction for Growth at South-East Wigston to provide for future housing needs in the Borough was established in the Core Strategy. The Direction for Growth provides the most sustainable option to meet future housing requirements over the plan period to 2036. As part of the consent for the 450 dwellings off Newton Lane, a package of contributions to improve local facilities was agreed as part of the Section 106 agreement. For Phase 2, Barratt and David Wilson Homes would welcome further discussions with the Council on the nature and extent of contributions likely to be required in association with the development of an additional 550 dwellings to inform masterplan proposals for the site.	The Council is keen to engage with site promoters and key stakeholders throughout the Local Plan process.
16/12/16	Pegasus Planning On Behalf Of Barratt Homes & David Wilson Homes	Policy 7.5 proposes the provision of 20% affordable homes in addition to the requirement for 20% starter homes. There is some concern that the proposed level of affordable housing provision sought on the site in addition to the starter home requirement could raise issues of viability.	Comment noted.
16/12/16	Pegasus Planning On Behalf Of	The National Planning Policy framework (NPPF) is clear that the sites and the scale of development identified in the plans should	Comment noted.

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	Barratt Homes & David Wilson Homes	not be subject to such obligations and policy burdens that their ability to be developed viably is threatened (para 173). The Council should provide further evidence to demonstrate that the provision of 20% affordable housing in addition to the starter homes is viable.	
16/12/16	Pegasus Planning On Behalf Of Barratt Homes & David Wilson Homes	The Policy seeks the provision of at least 2.5 hectares of employment land as part of the Phase 2 development, in addition to the 2.5 hectares granted consent as part of Phase 1. It is noted that, in relation to employment requirements, paragraph 8.46 of the Preferred Options document refers to the HEDNA report conclusions suggesting that there is no requirement to provide for employment land across the Borough up to 2036. Given these findings, some further justification for the proposals to include an additional 2.5 hectares of employment land as part phase 2 of the Direct of Growth would be helpful.	In the drafting of the Preferred Options Local Plan document, the Council was not aware of the outcomes of the HEDNA, in particular the level of employment need of the Borough. Therefore, the statement referred to is incorrect. The Council will take account of the outcomes of the HEDNA throughout the preparation of the Pre-Submission Local Plan document.  It should be noted that the Council is also currently in the process of further employment land evidence base to support the Local Plan.
16/12/16	Pegasus Planning On Behalf Of Barratt Homes & David Wilson Homes	Barrett and David Wilson Homes remain committed to bringing forward new development as part of the Direction for Growth and, subject to the above comments, support the proposal to allocate land for Phase 2 of the Direction for growth in the Local Plan to deliver a further 550 dwellings.	The Council acknowledges and welcomes the support of Pegasus Planning.
16/12/16	Pegasus Planning On Behalf Of Barratt Homes & David Wilson Homes	<b>Other Matters</b> The Preferred Options Paper includes a number of other more general policies setting out a number of requirements in relation to proposed developments. A number of these policy requirements are potentially onerous	Comment noted.  The wording of the Policy 5.1 will be amended to better reflect the Council's approach to education provision.

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		<p>and lack sufficient justification. We would offer the following comments on these policies.</p> <p><b>Policy 5.1, Creating a Skilled Workforce</b>, advises that planning permission will not be granted for residential development unless the individual or cumulative impacts of development on education provision can be addressed at the developers cost, either on site or through financial contributions. It is firstly important to note that the Education Authority has a statutory duty to make provision for school places to meet the future housing requirements identified in the plan.</p> <p>The Borough Council should work with the Education authority to ensure that any further required education provision is properly planned for. It may be reasonable for a development to make appropriate contributions to address additional requirements associated with that development but it would not be reasonable for a development to make good any existing deficiencies.</p>	
16/12/16	Pegasus Planning On Behalf Of Barratt Homes & David Wilson Homes	<p><b>Policy 5.2, Improving Health and Wellbeing</b>, states that the Borough Council will require Health Impact Assessments for all developments of 11 or more dwellings and non-residential developments of more than 1,000sqm. The NPPF makes no reference to health Impact Assessments. Paragraph 171 of the NPPF advises that it is the responsibility of the Council to work with</p>	<p>Comment noted.</p> <p>The Council will seek to amend the wording of Policy 5.2 to better reflect national policy and guidance.</p>

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		public health organisations to understand and improve the health and well-being of the local population rather than the responsibility of parties making applications for planning permission. The requirement should either be deleted or it should be clear that a Health Impact Assessment will only be required if significant impact has been identified.	
16/12/16	Pegasus Planning On Behalf Of Barratt Homes & David Wilson Homes	<b>Policy 6.1, Housing Choices</b> , requires all new developments to contribute towards delivering a mix of dwelling types, tenures and sizes and that proposals should demonstrate how they contribute to achieving identified needs as set out within the Housing and Economic Development Needs Assessment. Whilst the provision of a mix of housing on sites is appropriate, the council needs to take a flexible approach and should not seek to apply the Housing Mix identified in the yet to be published Housing and Economic Development Needs Assessment (HEDNA) on a site by site basis.	The Council is seeking to amend the wording of the policy to add a level of flexibility. The Policy wording will be amended to read ' <i>...Assessment and any other up to date evidence of housing need</i> '.
16/12/16	Pegasus Planning On Behalf Of Barratt Homes & David Wilson Homes	The Council needs to take into account the particular circumstances of sites, including issues of viability, in agreeing the appropriate mix on individual sites. The policy also aims to ensure that dwellings are of an appropriate size for its proposed occupants. It is not clear whether this is a reference to the nationally described space standards. The National Planning Practice Guidance (NPPG) confirms that where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies.	Policy 6.1 currently does not have any reference to space standards. The Council will consider the use of space standards in certain circumstances where there is evidence to justify doing so, however is unlikely to implement the use of space standards in all development. The Council will take a pragmatic approach through the new Local Plan.

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		<p>If the Council is intending to adopt the nationally described space standards, it should be justified by meeting the criteria as set out in the NPG including need, viability and impact on affordability. The Council has not provided sufficient evidence to justify adoption of the nationally described space standard, if that is what is intended. If so, the Council needs to provide a local assessment evidencing the specific case for Oadby and Wigston which justifies the policy requirements.</p>	
16/12/16	<p>Pegasus Planning On Behalf Of Barratt Homes &amp; David Wilson Homes</p>	<p><b>Policy 6.2, Housing Density</b>, advises that development sites over 0.3 hectares outside the town centre of Wigston or the district centre of Oadby will be required to achieve an average density of 40 dwellings per hectare. The NPPF advises that local authorities should set out their own approach to housing density to reflect local circumstances. Whilst the aim to maximise densities in the more sustainable locations is supported, it is considered that the requirement to achieve an average density of 40 dwellings per hectare on all sites outside the existing centres is unduly onerous. For Phase 2 of the Direction for Growth there is likely to be a range of densities across the site from around 30 dwellings per hectare to higher density areas. The policy should allow for greater flexibility for average densities on sites to reflect the particular local circumstances of the site.</p>	<p>The Council will consider reducing the dwelling per hectare density outside of the Borough's town and district centres and existing urban areas. The Council suggests that the density outside of these areas could be 30 dwellings per hectare rather than 40. It is felt that this density would better reflect the aspirations of the NPPF regarding flexibility.</p>
16/12/16	Pegasus	<b>Policy 6.3, Affordable Housing and Starter</b>	Comment noted.

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	<p>Planning On Behalf Of Barratt Homes &amp; David Wilson Homes</p>	<p><b>Homes</b> Sets out a minimum target of 20% affordable housing in Wigston in addition to a minimum 20% target for starter homes as set by government policy. We have commented on this requirement in relation to Policy 7.5 on the Direction for Growth. There is a concern that the requirement for 20% affordable housing along with 20% starter homes could potentially raise issues of viability on sites and the Council needs to provide further evidence to demonstrate that these targets can be achieved locally.</p> <p>In relation to the Council's proposals to allocate Phase 2 of the Direction for Growth at Wigston, Barrett Homes and Davis Wilson Homes would welcome the opportunity to meet with officers to discuss the opportunities for development on the site so that work on indicative masterplan proposals can be progressed to help inform the submission version of the Local Plan.</p>	<p>Any definition of Affordable Housing contained within the Local Plan will be consistent with the definition expressed by national government.</p>
<p>16/12/16</p>	<p>Kodiak Land</p>	<p>Kodiak's representations at this stage focus on site specific issues but we reserve the right to comment further as part of forthcoming consultation and at examination. Kodiak comments generally as follows:</p> <p><b>Distribution of Growth</b> While we understand that the Council have not yet published evidence in relation to the Objectively Assessed Housing Need on which the plan's housing requirement will be based, Kodiak urge caution in respect of</p>	<p>If further greenfield release sites are required to reflect the outcomes of the HEDNA the Council will identify these within the Pre-Submission Local Plan where appropriate to do so. The Council identified areas of potential greenfield release within the Preferred Options document, these were Land between Stoughton Road and Gartree Road, Oadby; Land at Cottage Farm, Oadby; and, Land west of Welford Road, Wigston.</p> <p>Any sites submitted through the Call for Sites process or which have been identified within the Council's</p>

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		<p>concentrating a large proportion of the district's growth into a single Direction for Growth area. Policy 7.5, which deals with the Wigston Direction for Growth Area, is clear that any housing delivered in this Sustainable Urban Extension will be required to deliver significant infrastructure including a primary school, employment and a new link road. While such an ambition is laudable, there is evidence from across the country that the lead-in times associated with SUEs are significantly longer than for smaller sites, which are deliverable within the five year period and can help to meet the pressing housing need which exists now. Furthermore, in accordance with the NPPF's objective of increasing choice and competition in the market for housing, growth should not be focused on a single site in a single part of the district, an approach which could stifle the market. As such, while we recognise the constraints which exist in a small largely urban district such as Oadby &amp; Wigston, Kodiak would encourage the Council to allocate a range of sites of different sizes in different locations across the district, which will ensure that a wide choice of high quality homes is delivered in Oadby &amp; Wigston, in accordance with paragraph 50 of the NPPF.</p>	<p>SHLAA will be assessed during the production of the Pre-Submission Local Plan.</p>
16/12/16	Kodiak Land	<p><b>Housing Allocations</b> Following from the above commentary, Kodiak is encouraged that Policy 7.1 of the Preferred Options draft states that the Council will allocate greenfield release sites to ensure flexibility in the plan. It is also</p>	<p>Comment noted.  If further greenfield release sites are required to reflect the outcomes of the HEDNA the Council will identify these within the Pre-Submission Local Plan where appropriate to do so. The Council identified areas of</p>

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		important that sufficient reserve sites are identified which will ensure that there is a rolling five year housing land supply should any unforeseen issues prevent any of the allocated sites from coming forward. Kodiak support the allocation of the site identified at Land west of Welford Road, Wigston, and a more detailed submission supporting the site's allocation is included below.	potential greenfield release within the Preferred Options document, these were Land between Stoughton Road and Gartree Road, Oadby; Land at Cottage Farm, Oadby; and, Land west of Welford Road, Wigston.
16/12/16	Kodiak Land	<p><b>Green Wedges</b></p> <p>Kodiak understand that in urban fringe districts such as Oadby &amp; Wigston, there is a desire to prevent the unnecessary coalescence of settlements to protect their individual character and reduce urban sprawl. However, it is important that policies such as Policy 10.6 which deals with Green Wedges, are based on a robust, up-to-date evidence base and that such a policy does not become a proxy for a highly restrictive green belt policy.</p>	As part of the Pre-Submission Local Plan production, the Council will be undertaking a Green Wedge review to ensure that the evidence underpinning the Green Wedge policy is robust and up to date.
16/12/16	Define Planning On Behalf Of Bloor Homes	<p><b>Vision &amp; Objectives</b></p> <p>The Vision refers to an availability of a “<i>diverse mix of housing types</i>” and an emphasis on “<i>establishing more affordable homes</i>” throughout the Borough. The “outcomes” that are identified in the Vision refer to creating the “<i>right balance of jobs, housing and infrastructure</i>” and “<i>balancing the development needs of the Borough with the protection and enhancement of the environment</i>”.</p> <p>There is, however, no reference to the delivery of affordable homes, despite it being</p>	Comment noted.

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		<p>identified as a key issue for the Borough. Later, Objective 8: A Balanced Housing Market, somewhat briefly, refers to “adequate” affordable housing provision and a “sustainable blend of choice to meet local needs”.</p>	
16/12/16	Define Planning On Behalf Of Bloor Homes	<p>That is clearly an entirely inadequate response to the Government’s policy imperative to provide sufficient housing to meet the needs of present and future generations, and in doing so to widen the choice of housing (NPPF para 7 &amp; 9). The NPPF requires (para 14) that:</p> <p><i>“local planning authorities should positively seek opportunities to meet the development need of their area”; and that “Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change”, and set out a “clear strategy for allocating sufficient land” (para 17). More specifically in order to “significantly boost the supply of housing” it requires (para 47) that local planning authorities use their evidence base to ensure that their Local Plan “meets the full objectively assessed needs for market and affordable housing in the market housing area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.”</i></p>	<p>The Council’s Pre-Submission Local Plan document will be positively prepared and will take account of the HEDNA and other up to date evidence base.</p> <p>If the outcomes of the HEDNA require the Council to do so, the Council will assess a number of sites across the Borough to test their suitability for residential development during the proposed Plan period up to 2036. The Council will assess all sites that have been submitted through the Call for Sites process as well as sites that have been identified within the Council’s SHLAA.</p> <p>The Council will actively seek the provision of affordable housing within the Borough through the Affordable Housing policy of the Local Plan.</p> <p>The provision of sufficient affordable housing will be referenced within the Council’s Vision set out within the Local Plan.</p>
16/12/16	Define Planning On Behalf Of Bloor Homes	<p>The “brief” for the preparation of the Local Plan is, therefore, very clear. Ensuring that there is a continual supply of both market and</p>	<p>Comment noted.</p>

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		<p>affordable housing is a critical policy imperative for the Government and a central tenet of the NPPF. Insufficient housing provision has resulted in a nationwide “housing crisis” that needs to be addressed as a matter of urgency. In Oadby and Wigston specifically, there is clear evidence of an acute affordable housing need (e.g. 2014 SHMA), and an extremely poor record of affordable housing delivery since the extant Development Plan was put in place. Indeed, the provision of affordable housing is the first “key issue &amp; challenge” identified in the Local Plan. It is crucial, therefore, that the Local Plan addresses these matters As set out in Bloor Homes’ response to the “Local Plan Position Statement”, that process starts with a comprehensive, robust and objective assessment of development needs across the HMA and within the individual authority areas, that provides a sound understanding of the scale and nature of development that should be planned for. The Local Plan must then ensure sufficient land comes forward to meet those identified needs through the identification and allocation of deliverable development sites.</p>	
<p>16/12/16</p>	<p>Define Planning On Behalf Of Bloor Homes</p>	<p>There is no indication that these policy imperatives cannot be achieved in the Local Plan, and to not do so would only perpetuate the “housing crisis” with severe social and economic consequences for present and future generations. Notably the Cottage Farm Inspector (para 27) highlighted that it:</p>	<p>Comment noted.</p>

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		<p><i>“could lead to some form of shared housing, overcrowding and perhaps eventually homelessness. All of which would be contrary to the expectations of the NPPF which looks for a significant boost in the supply of high quality housing”.</i></p>	
16/12/16	Define Planning On Behalf Of Bloor Homes	<p>Whilst the general intent to protect and enhance the area’s environment is welcomed, that must be viewed in the context of providing sufficient housing to meet identified needs in accordance with Government policy will inevitably have some impact on the local environment. The key issue is how that impact is managed and mitigated.</p>	Comment noted.
16/12/16	Define Planning On Behalf Of Bloor Homes	<p>The Local Plan Vision and Objectives must, therefore, explicitly refer to providing a sufficient supply of deliverable land to ensure that the Borough’s identified market and affordable housing needs are met, and that housing needs across the HMA are provided for.</p>	Comment noted.
16/12/16	Define Planning On Behalf Of Bloor Homes	<p><b>Local Plan Position Statement</b>            Bloor Homes welcome the preparation of the Local Plan and support its intention to plan for development and growth in the Borough. It is noted that the Council is not yet committing to a plan period, but the requirement of the NPPF (paragraph 157, point 2) is clear on that point: local plans should <i>“be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date”</i>. On that basis, Bloor Homes would support the Local Plan covering a</p>	Comment noted.

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		period to 2036.	
16/12/16	Define Planning On Behalf Of Bloor Homes	That, however, must be on the basis that the Local Plan will reflect the evolving strategic context that will emerge through the preparation of the Leicester and Leicestershire Strategic Growth Plan, and be subject to review as and when necessary to ensure that it remains up-to-date, and that the identified development needs in the Borough and across the Housing Market Area (HMA) are met throughout the plan period.	The Council's Local Plan will take account of the wider strategic context, in this case the Strategic Growth Plan. The Strategic Growth plan is being produced with the involvement of all local authorities within Leicester and Leicestershire, including the LLEP and Leicestershire County Council.
16/12/16	Define Planning On Behalf Of Bloor Homes	In that regard the work the Council is undertaking with the other authorities in the Housing Market Area (the HMA Authorities), particularly the preparation of the Housing and Economic Development Needs Assessment (HEDNA), is very much welcomed. However, it is essential that the evidence is prepared in a clear and transparent manner, and genuine consultation is undertaken in relation to the findings and its application. Notably, the HEDNA must be prepared in a comprehensive and robust manner that accord with National Planning Practice Guidance (PPG). It should utilise the latest Government projections and apply appropriate uplifts to ensure that economic growth needs and affordable housing needs are addressed and that true objectively assessed needs (OAN) are identified for both individual local authority areas and the wider HMA in accordance with the NPPF. This is critical (particularly given the shortcomings of	Alongside the Strategic Growth Plan, under the Duty to Cooperate, the local authorities are working collectively to produce (and all sign up to) and agree a Memorandum of Understanding that illustrates the housing provision target for each of the local authorities within the Leicester and Leicestershire Housing Market Area.

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		<p>the existing evidence base) as it will ensure that the Local Plan can progress on a sound foundation with a clear understanding of the scale and nature of development that it should plan for. Notwithstanding that, and as the Local Plan Position Statement then highlights, the capacity of the individual HMA Authorities to accommodate their development needs within the plan period must be robustly considered to establish where unmet needs might arise. This is a particular concern in respect of Leicester City given the emerging evidence of the substantial scale of need (even just based on the demographic evidence) and the limited evidence of the capacity of city to accommodate the development required to meet that need. Any unmet needs arising will need to be accommodated by the other HMA Authorities, including Oadby and Wigston Borough, under the Duty to Cooperate (DTC).</p>	
<p>16/12/16</p>	<p>Define Planning On Behalf Of Bloor Homes</p>	<p>In respect of the DTC, the NPPF states (para 179) that <i>“joint working should enable local authorities to work together to meet development requirements which cannot be wholly met within their own areas”</i>. It requires (para 181) that authorities <i>“demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts”</i>. The demonstration of effective cooperation in reality means a <b>positive outcome</b> to the strategic planning discussions that are undertaken. As the St Albans Local Plan Inspector recently summarised <i>“effective cooperation is likely to require sustained joint</i></p>	<p>Alongside the Strategic Growth Plan, under the Duty to Cooperate, the local authorities are working collectively to produce (and all sign up to) an agree a Memorandum of Understanding that illustrates the housing provision target for each of the local authorities within the Leicester and Leicestershire Housing Market Area.</p>

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		<p><i>working with concrete actions and outcomes</i>". Compliance with the duty to cooperate is, therefore absolutely essential if the Local Plan is to help <i>"boost significantly the supply of housing"</i> and meet <i>"the full objectively assessed needs for market and affordable housing in the market housing area"</i> as required by the NPPF (para 47). The preparation of the new Local Plan cannot, therefore, progress beyond this stage without these matters being addressed.</p>	
16/12/16	Define Planning On Behalf Of Bloor Homes	<p>It is understood that agreement of a new Memorandum of Understanding (MoU) is being sought to resolve this matter, but that must be undertaken in an open forum, with meaningful consultation, and not simply presented as a fait accompli. The conclusions reached in terms of the spatial distribution of growth must be justified by the evidence base, taking account of where the needs arise and market demand, the realistic capacity to accommodate the required development, and then other legitimate planning objectives (e.g. the relationship to employment and regeneration needs). That process will identify the housing "requirement" to be provided for in the Local Plan.</p>	<p>The outcomes of the Memorandum of Understanding and the Strategic Growth Plan will be justified by robust and up to date evidence base and Sustainability Appraisal work. All of the local authorities within the Leicester and Leicestershire HMA are committed to working together. Once preferred site allocations have been selected, the SA will document the Council's reasons for selecting or not selecting each option.</p>
16/12/16	Define Planning On Behalf Of Bloor Homes	<p><b>Policy 4.2 Spatial Strategy for Development in the Borough</b> The stated intention to allocate sufficient land for the development of new dwellings over the plan period up to 2036 to meet the required need is very much supported (for the reasons set out in Bloor Homes' response to</p>	<p>The Council acknowledges and welcomes the support of Define Planning.</p>

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		“Vision and Objectives”).	
16/12/16	Define Planning On Behalf Of Bloor Homes	However, the policy then proceeds to set out an inappropriate sequential approach to the allocation of development sites (see also para. 7.3-7.5). Indeed, the policy later refers to an intention to “prioritise” development in the (PUA) to support the regeneration of the settlement centres. The regeneration of the town centres and use of previously development land in the Borough is supported by Bloor Homes. However, whilst the NPPF (para 17) “ <i>encourages</i> ” the use of previously developed land, it does not prioritise it. Therefore, a brownfield land first approach cannot be adopted in the Local Plan, as the policy imperative must be the delivery of sufficient greenfield and brownfield land to meet identified development needs when they arise.	Comment noted.
16/12/16	Define Planning On Behalf Of Bloor Homes	The policy continues to refer to the provision of one Direction for Growth to the south east of Wigston, and then provision for further greenfield release sites throughout the Borough to reflect identified housing need requirements. That appears inconsistent with Objective 7: Growth of the Principal Urban Area (PUA) that refers to establishing “ <i>a number of Direction for Growth areas adjacent to the PUA to meet the Borough’s housing allocation</i> ”. There is, therefore, some confusion as to the distinction between the Direction for Growth and other greenfield sites, and whether here too, the Council are proposing an inappropriate sequential approach to the allocation of greenfield sites	<p>The Council is committed in providing the homes that the Borough needs. The Council is aware that the NPPF suggests that Local Plans should be flexible and should not ‘put all its eggs in one basket’.</p> <p>If further greenfield release sites are required to reflect the outcomes of the HEDNA the Council will identify these within the Pre-Submission Local Plan where appropriate to do so. The Council identified areas of potential greenfield release within the Preferred Options document, these were Land between Stoughton Road and Gartree Road, Oadby; Land at Cottage Farm, Oadby; and, Land west of Welford Road, Wigston.</p>

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		(also refer to para 7.4). Nevertheless, it is apparent that a “portfolio” of significant greenfield sites is required to ensure that a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period (NPPF para. 47).	
16/12/16	Define Planning On Behalf Of Bloor Homes	<p>The extant Core Strategy allocated a single greenfield site for development (the existing Direction for Growth), and as a direct consequence there has been a great reliance on windfall sites to provide the much needed market housing, and the Borough has not been able to maintain a 5 year housing land supply. That is not the positive plan led approach to delivering sustainable development to meet housing needs sought by the NPPF (para 150-151), and whilst it has meant that some market housing has been delivered, it has failed to deliver the affordable housing that is so desperately required in the Borough.</p> <p>Moreover, there is no evidence to suggest that the further extension of the Direction for Growth should automatically be a preferred option when compared to the allocation of another greenfield sites in the Borough. Particularly given the scale of development that has recently taken place in Wigston, and that which is still planned to be delivered. In contrast, very limited development has taken place in Oadby in recent years (the 2015 Residential Land Availability Report highlights that only 20 dwellings have been</p>	<p>Historically, the Council has never relied on windfall sites to maintain a rolling 5 year supply of housing land. The Council has recently identified the role of windfall sites and has taken account of them when producing recent 5 year land supply figures. The NPPF states that ‘local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply’.</p> <p>The Council’s Housing Implementation Strategy sets out the Council’s approach to windfalls, which must be stressed is very conservative relative to the number of windfall sites that have historically come forward. It is logical that a distinctly urban environment will have a relatively high number of windfall sites coming forward, however the Council is aware that windfall sites should not be relied on during long term Plan making, and as such will only ever take account of a windfall allowance (should evidence suggest to do so) on a five year basis.</p> <p>The Wigston Direction for Growth area has been and is still considered appropriate for residential development as it supports the town centre of Wigston, the Borough’s main town. The Council is aware that developments in other areas of the Borough can also play a supporting role.</p>

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		<p>provided in Oadby since 2006, and none in the last 3 years), and the housing needs of Oadby's residents are not currently being met. The delivery of Bloor Homes' committed development site at Cottage Farm, Oadby will begin to address that issue, and provide competition and choice in the housing market (in accordance with the NPPF), but clearly a much greater scale of development is required in Oadby throughout the plan period to 2036 (refer also to Bloor Homes' comments in relation to Policy 7.1).</p>	<p>If further greenfield release sites are required to reflect the outcomes of the HEDNA the Council will identify these within the Pre-Submission Local Plan where appropriate to do so. The Council identified areas of potential greenfield release within the Preferred Options document, these were Land between Stoughton Road and Gartree Road, Oadby; Land at Cottage Farm, Oadby; and, Land west of Welford Road, Wigston.</p>
16/12/16	Define Planning On Behalf Of Bloor Homes	<p><b>Policy 6.1 Housing Choices</b>          Bloor Homes support the provision of an appropriate and viable mix of dwelling types, tenures and sizes in new developments. However, they would be concerned if the proposed policy in relation to housing mix was unduly prescriptive as that can have significant implications for the viability of sites that needs to be carefully considered. Furthermore, the policy only refers to housing need rather than demand. The NPPF clearly states (2nd bullet para 50) that demand is a key consideration when identifying "<i>the size, type, tenure and range of housing that is required</i>". It is essential that the Council takes account of nature of the demand for housing when working with developers to ascertain the most appropriate housing mix for a site.</p>	<p>Comment noted.</p>
16/12/16	Define Planning On Behalf Of Bloor Homes	<p><b>Policy 6.2 Housing Density</b>          The aspiration to make effective and efficient use of development sites is recognized. However, whilst the NPPF (para 47) states that the approach to housing density should</p>	<p>The Council will consider reducing the dwelling per hectare density outside of the Borough's town and district centres and existing urban areas. The Council suggests that the density outside of these areas could be 30 dwellings per hectare rather than 40. It is felt</p>

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		<p>reflect local circumstances, the policy as currently expressed is a crude tool that would be impractical and unduly prescriptive. Notably, the blanket application of a minimum density requirement of 40 dwellings per hectare outside of the town centre of Wigston and district centre of Oadby, whether the site is located within the wider urban area or on its edge at the interface with the countryside, is clearly entirely inappropriate. A more flexible approach is required that allows developers to respond to the particular nature and character of the site and its context. That will ensure that the potential of development sites is optimised, and will allow appropriate development proposals to emerge that will provide a wider choice of high quality homes in form that reflects the key design objectives set out in paragraph 58 of the NPPF.</p>	<p>that this density would better reflect the aspirations of the NPPF regarding flexibility.</p>
16/12/16	<p>Define Planning On Behalf Of Bloor Homes</p>	<p><b>Policy 6.3 Affordable Housing and Starter Homes</b>  The need to increase the level of affordable housing provision to address the acute need in the Borough is supported by Bloor Homes. Viability is a critical issue in the determination of affordable housing targets and the tenure mix. That was highlighted in the letter from Brandon Lewis MP to all of the Local Authority Leaders dated 9th November 2015, that seeks to encourage local authorities to act quickly and constructively in renegotiating Section 106 requirements to address viability issues. The viability caveat in the policy is, therefore, very welcome. However, in plan making the key is of course to establish</p>	<p>Comment noted.   The Council acknowledges and welcomes the support of Define Planning.</p>

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		requirements that are deliverable in the first instance, and the Council needs to demonstrate that the totality of the policy requirements in the Local Plan (cumulatively) are achievable and do not render development unviable (NPPF paras 158, 173-174).	
16/12/16	Define Planning On Behalf Of Bloor Homes	That matter must be considered at this stage, but it will also need to take account of the Governments' Starter Homes Initiative in due course when the details of that have been confirmed. It is not necessarily the case, however, the provision of 20% of dwellings as starter homes will necessarily be an additional requirement over and above the Council's own affordable homes requirement as the policy and supporting text currently suggests (para 6.12).	Comment noted.
16/12/16	Define Planning On Behalf Of Bloor Homes	<p><b>Policy 7.1 Housing Allocations</b>            Bloor Homes' comments in relation to Policy 4.2 set out their concerns in relation to the appropriateness of the Council's preferred strategy of applying a strict sequential approach to the allocation of development sites. The policy imperative must be the delivery of sufficient greenfield and brownfield land to meet identified development needs when they arise. To do that a portfolio of development sites around the Borough is required, particularly in Oadby where very little development has taken place in recent years.</p> <p>A number of potential greenfield site options are identified in Policy 7.1. Bloor Homes</p>	<p>If further greenfield release sites are required to reflect the outcomes of the HEDNA the Council will identify these within the Pre-Submission Local Plan where appropriate to do so. The Council identified areas of potential greenfield release within the Preferred Options document, these were Land between Stoughton Road and Gartree Road, Oadby; Land at Cottage Farm, Oadby; and, Land west of Welford Road, Wigston.</p> <p>The Council will be undertaking site assessment evidence base work to ensure that (if required to do so) any land identified for residential development during the Local Plan plan period up to 2036 is sustainable, located in the most appropriate location, viable and deliverable.</p>

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		<p>control the site at Cottage Farm, Glen Road, Oadby part of which now has the benefit of an outline planning permission for residential development, and they intend to implement that scheme at the earliest opportunity. That will therefore, make a significant contribution to meeting market and affordable housing needs in Oadby and the Borough, and provide competition and choice in the housing market. However, clearly a much greater scale of development is required at Oadby throughout the plan period to 2036.</p> <p>The Council will be aware from earlier Allocations DPD and SHLAA submissions that there is additional land within the full natural and logical extent of the site at Cottage Farm, that could, and should, make a further contribution to meeting the Borough's housing requirement and public open space provision in the area.</p> <p>The development scheme for the committed site was developed through a clear understanding of the site and its context to create a high quality and distinctive development proposal that is very well integrated with its surroundings. The committed development scheme has the capacity to provide up to 150 new homes, 30% of which would be affordable, and over 2 ha of public open space providing a variety of recreation opportunities, and biodiversity and landscape enhancements. However, the development scheme was designed from the</p>	
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		<p>outset in manner that would allow for its natural extension to the site's full logical extent in a cohesive and integrated manner, building on the key development parameters and principles that were clearly established and endorsed in the application/appeal process. The determination of the application and appeal have also highlighted that the site is an entirely suitable development site in an accessible and unconstrained location in respect of highways, drainage, landscape, ecology, archaeology and cultural heritage. Indeed, the original application proposals attracted no environmental, technical or design-based objections from statutory consultees outside of the Borough Council, and relatively few third party objections.</p> <p>The wider site is not subject to any landscape quality designation, it is not green wedge, and the Borough Council's Landscape Character Assessment specifically acknowledges that this area could accommodate some development with appropriate mitigation. Indeed, in this case the actual impact will be relatively limited as key landscape features can be retained, the visual envelope is very contained, and the public open space and strategic landscaping that would be provided can positively respond to the landscape character and visual amenity.</p> <p>The development of the committed site and its further extension as outlined above would</p>	
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		<p>result in a number of significant benefits including the provision of new housing to maintain the 5 year housing land supply, boost the supply of housing in the longer term, and provide much needed affordable housing to help meet the acute need that exists in the Borough. The proposed development would result in a number of clear economic benefits through new job creation, local spend in the area and the new homes bonus. It would also result in environmental benefits through the provision of a high quality scheme that optimises the use of an unconstrained site in a sustainable location, which is integrated with the built form of Oadby and respects its relationship with the countryside. The development of the full site at Cottage Farm would, therefore, positively contribute to the economic, social and environmental objectives of sustainable development advocated by the NPPF, and the site should be allocated for development under Policy 7.1.</p>	
16/12/16	Define Planning On Behalf Of Bloor Homes	<p><b>Policy 7.5 Wigston Direction for Growth Area</b>          Bloor Homes do not necessarily object to the further development of the Direction for Growth, but the Council do need to make a robust assessment of the timing of the delivery of the additional land following the completion rate of the committed Direction for Growth development, and the likely rate of delivery based on the record of delivery of the committed development. These are critical matters in the preparation of the Local Plan's</p>	Comment noted.

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		housing trajectory that needs to demonstrate that the identified housing requirements will be delivered through the plan period, and that a rolling 5 year housing land supply will be maintained.	
16/12/16	Define Planning On Behalf Of Bloor Homes	<p><b>Policy 10.2 Climate Change, Flood Risk and Renewable Low Carbon Energy</b>          Bloor Homes have adopted a holistic fabric first approach in their house type design as an alternative to renewable energy infrastructure. That approach seeks to reduce each dwelling's inherent energy demand by reducing the U values of mass or thermal elements to exceed minimum standards and designing their dwellings to reduce the effects of thermal bridging and address building air tightness. They also install water saving appliances to aid water efficiency, highly efficient gas condensing boilers to reduce fuel costs, and gas savers and waste water heat recovery systems to reduce carbon emissions. Energy display devices are provided so energy use can be monitored in the home.</p> <p>The fabric first approach has a number of clear benefits over the provision of on-site renewable energy generation as required by Policy 10.2. Notably that it is built into the property for its whole life ensuring that every occupier will benefit from lower energy use, and it still achieves the aim of reducing CO2 emissions. In comparison to renewable technologies there is no maintenance required, and it avoids the concern whether</p>	Comment noted.

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		<p>the technologies are actually being used.</p> <p>Policy 10.2 should seek to allow, and indeed encourage, a fabric first approach to addressing these issues as an alternative to on-site renewable energy generation, which is in any case notoriously difficult to deliver.</p>	
16/12/16	Define Planning On Behalf Of Bloor Homes	<p><b>Policy 10.7 Countryside</b>          Policy 10.7 identifies land outside the Limits to Development (and Green Wedge) as Countryside, and, as paragraph 10.33 seeks to explain, seeks to protect it against “<i>inappropriate development</i>”, allowing development only for specific uses and in very specific circumstances. Bloor Homes object to this approach as it is not in compliance with the core planning principles of the NPPF. NPPF (para 17) now requires Local Plans to “<i>recognise</i>” the intrinsic character and beauty of the countryside, but it is no longer subject to a blanket protection from development where identified development needs exist. Similarly, whilst the NPPF (para 17) “<i>encourages</i>” the use of previously developed land, it does not prioritise it over other suitable and sustainable sites that can equally contribute to meeting identified needs. A countryside protection and brownfield land first approach cannot be adopted in the Local Plan, as the policy imperative must be the delivery of sufficient greenfield and brownfield land to meet identified development needs when they arise.</p>	<p>Policy 10.7 as worded does not apply ‘blanket’ protection for the countryside. The policy rightly suggests that there may be development required in countryside locations, however suggests that development will only be permitted should the justifiable need outweigh any adverse impacts. The Council is of the opinion that the policy as currently drafted is compliant with national policy and guidance.</p>

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		<p>The critical issue to consider is the delivery of appropriate and deliverable greenfield and brownfield sites, in sustainable locations, where the harm can be minimised and effectively mitigated against through the scheme design. The Council’s approach also potentially restricts the ability to address shortfalls in housing delivery and maintain the overall 5 year land supply position. The final paragraph of the policy should be amended to address that and ensure that there is sufficient flexibility to embrace potential sustainable development opportunities as they arise where there are wider socioeconomic benefits that outweighs any harm, or that harm can be appropriately mitigated. As such, Policy 10.7 should be amended to avoid restricting sustainable development that can be appropriately managed through other policies within the Local Plan in order to reflect the presumption in favour of sustainable development and the need to meet objectively assessed needs with sufficient flexibility to adapt to change (para 14), and remedy the current conflict within the NPPF arising from the application of a blanket protectionist approach (para 17).</p>	
16/12/16	Define Planning On Behalf Of Bloor Homes	<p><b>Policy 11.1 Infrastructure and Developer Contributions</b>  The intent of the policy is supported by Bloor Homes. However, the Local Plan needs to demonstrate that the policy requirement accords with the appropriate parts of the Community Infrastructure Levy Regulations 2011 (e.g. Regulation 122 in the case of a</p>	Comment noted.

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		<p>Section 106 Obligation). For example, development should not be required to remedy existing deficiencies. Moreover, the policy should include a caveat in relation to the critical need to maintain the viability of the required development. In the first instance, however, the Borough Council must demonstrate that the policy and infrastructure requirements in the Local Plan (cumulatively) in terms of financial contributions are achievable and do not render development unviable (NPPF paras 158, 173-174). That must be considered at this stage.</p> <p>The critical role of other bodies in the planning, funding and delivery of infrastructure should also be explicitly referred to in order to encourage their proactive involvement. For example, the policy should reflect that it is the responsibility of the utilities company to provide the necessary water supply and wastewater infrastructure to support development. Their investment programmes are not necessarily integrated with Development Plans, and often will not address the development requirements for an area until specific proposals become committed, normally through the grant of planning permission.</p>	
16/12/16	Define Planning On Behalf Of Bloor Homes	<p><b>Section 12 Monitoring and Review</b></p> <p>The reference to a future review of the Local Plan where “<i>a policy is not working, or key targets are not being met</i>” is welcomed. However, greater clarity is required as to the circumstances that might trigger a review,</p>	<p>The Council acknowledges and welcomes the support of Define Planning.</p> <p>Comment noted.</p>

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		<p>e.g. a persistent shortfall in the 5 year housing land supply, or the failure of the Direction for Growth and other allocated sites (e.g. those in the town centres) to deliver scale of development required to meet the identified housing needs, when they are required. Fundamentally, the reference to a Local Plan Review to address those potential shortcomings should be a firm commitment enshrined in an actual policy rather than general text.</p>	
16/12/16	<p>GL Hearn on Behalf Of Severn Trent Water (Oadby Sewage Treatment Works)</p>	<p>Strategic Vision STWL broadly welcome the Council’s Vision for the Borough to 2036 and support the ambition to ensure that the area has a prosperous economy. STWL also supports the Local Plan objective for improved employment opportunities, namely to:</p> <p>“To provide for the development of employment land on a variety of sites to support a diversity of employment opportunities and to achieve a better balance between the location of jobs and housing, which will reduce the need to travel and promote sustainable growth up to the period 2036.”</p> <p>New employment land will be provided in the most appropriate locations including the Direction for Growth areas, to provide opportunities for fresh employment areas and accommodation to meet the needs of local businesses wishing to grow and those wishing to establish new businesses in the</p>	<p>The Council acknowledges and welcomes the support of GL Hearn.</p>

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		Borough. There will be better access to the road network also.	
16/12/16	GL Hearn on Behalf Of Severn Trent Water (Oadby Sewage Treatment Works)	Policy 4.2 - STWL broadly support the policy direction, however acknowledge that until the findings of the Leicestershire Housing and Economic Development Needs Assessment (HEDNA) are published it is not possible to set a specific employment land requirement informed by an objectively assessed need.	The Council acknowledges and welcomes the support of GL Hearn.
16/12/16	GL Hearn on Behalf Of Severn Trent Water (Oadby Sewage Treatment Works)	Policy 7.4 - Oadby Sewage Treatment Works STWL support the identification of the site for 'employment-based redevelopment proposals' in principle and are keen to work collaboratively with the Council to deliver a high quality employment scheme at the site. Further comment will be provided by STWL once additional employment evidence has been published.	The Council acknowledges and welcomes the support of GL Hearn.  The Council is always keen to meet with key stakeholders within the Borough.
16/12/16	Landmark Planning On Behalf Of Davidson's Developments Ltd	Policy 4.2 of the Preferred Option (PO) consultation states that the Council will allocate sufficient land to meet the housing needs of the Borough (in bullet point 1) yet, as acknowledged in the Position Statement there is a County-wide work being carried in respect of objectively assessed housing needs with the HEDNA. \this is cited as justification for policy 4.2 not containing a target dwelling per annum figure. Whilst it is appreciated that the Council wish to make progress with the Local Plan such a critical omission from the content of the Plan provides no certainty for developers, land owners or the residents of the Borough and means that the Plan is being positively prepared. The findings of the HEDNA may	Comment noted.  The Council will ensure that the Pre-Submission Local Plan document is based on up to date and robust evidence. The Council will also take account of the outcomes of the HEDNA.

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		<p>give rise to an increased requirement for new dwellings in the Borough (over and above the 95 dwellings set out at Issues and Options stage). This may require the Borough to alter their overall strategy, particularly with regard to the need to allocate specific sites for new development.</p> <p>In addition, there is reference in the Strategic Context of the Plan to the preparation of the Leicester and Leicestershire Strategic growth Plan. This Plan, whilst, having a longer timeframe than the Local Plan, will also reference the amount and location of development that will be required in the Borough. In a similar vein to the relationship with HEDNA, the preparation of the Local Plan without reference to a target figure provides little certainty for the future.</p>	
16/12/16	Landmark Planning On Behalf Of Davidson's Developments Ltd	<p><b>Page 27, Objectives 7 &amp; 8</b> Objective 7 is supported and the recognition that growth areas adjacent to the Principle Urban Area (PUA) will be required to deliver housing is welcomed. Objective 7, however also needs to recognise the requirement in the National Planning Policy Framework (paragraph 47) for local authorities to meet objectively assessed housing needs (rather than the Borough's housing allocation and Objective 7 should be updated to reflect this.</p>	The wording of the objective will be amended to better reflect national government guidance and policy.
16/12/16	Landmark Planning On Behalf Of Davidson's Developments	Objective 8 should be consistent with Objective 7 and acknowledge that to deliver housing in the Borough the focus of new housing will also need to include land adjacent to the urban areas of Oadby,	The wording of the objective will be amended to better reflect national government guidance and policy.

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	Ltd	Wigston and South Wigston, as well as the centres of the urban area. Objective 8 should be updated accordingly.	
16/12/16	Landmark Planning On Behalf Of Davidson's Developments Ltd	<p><b>Page 29, Paragraph 4.5</b> As indicated in relation to policy 4.2 of the PO, deferring the number and/or locations of further greenfield releases until after the receipt of the HEDNA undermines the preparation of the Plan, as it provides no certainty for developers, land owners or residents. As indicated below, my clients feel that the land at Sutton Close should be considered as an option for greenfield land release in addition to the three sites listed in paragraph 4.6</p>	<p>Comment noted.</p> <p>The Pre-Submission Local Plan document will specify the locations of appropriate and sustainable greenfield release (if required the Council is required to do so).</p> <p>The Council will be undertaking site assessment evidence base work to ensure that (if required to do so) any land identified for residential development during the Local Plan period up to 2036 is sustainable, located in the most appropriate location, viable and deliverable.</p>
16/12/16	Landmark Planning On Behalf Of Davidson's Developments Ltd	<p><b>Page 31, Policy 4.2 'Spatial Strategy For Development Within The Borough'</b> As noted in the response to paragraph 4.5 of the Preferred Options, my clients support the need for further greenfield land releases but feel that these should be specified in terms of their location and number of dwellings that they could accommodate.</p> <p>The sixth bullet point of policy 4.2 acknowledges that there is a need for further greenfield land releases for provide new dwellings. As indicated in my representations in respect of the Issues and Options consultation at point 5, my clients have an interest in land at Sutton Close Road, Oadby (page 46 of the 2012 SHLAA). Although the site was considered unsuitable and unachievable in this assessment, this</p>	<p>Comment noted.</p> <p>The Pre-Submission Local Plan document will specify the locations of appropriate and sustainable greenfield release (if required the Council is required to do so).</p> <p>The Council will be undertaking site assessment evidence base work to ensure that (if required to do so) any land identified for residential development during the Local Plan period up to 2036 is sustainable, located in the most appropriate location, viable and deliverable.</p>

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		appears to be solely in respect of its designation as green Wedge. The release of the site for residential development would be an environmentally appropriate and sustainable development.	
16/12/16	Landmark Planning On Behalf Of Davidson's Developments Ltd	As indicated above, the site at Sutton Close represents an opportunity to deliver a sustainable residential development of approximately 200 dwellings (the site size is approximately 9 hectares, although part of the site would be given over to amenity and other open space – see below).	Comment noted.
16/12/16	Landmark Planning On Behalf Of Davidson's Developments Ltd	Bearing in mind the requirements for any Local Plan to meet the tests of soundness (in particular, the requirement of the plan to be positively prepared and justified), it is considered that the inclusion of the location and extent of the planned greenfield land releases would ensure that the Council can demonstrate that all reasonable alternatives have been properly considered and that the plan is founded on the most appropriate strategy.	Comment noted.
16/12/16	Landmark Planning On Behalf Of Davidson's Developments Ltd	<b>Page 40, Policy 5.3 'High Quality Design &amp; Construction'</b> The positive approach to design and construction is supported. This accords with guidance contained in paragraph 59 of the NPPF and avoids being overly prescriptive in design matters.	The Council acknowledges and welcomes the support of Landmark Planning.
16/12/16	Landmark Planning On Behalf Of Davidson's Developments	<b>Page 46/47, Policy 5.5 'Green Infrastructure'</b> Paragraph 5.0 of the Local Plan Preferred Options notes that the proposed Direction for Growth area and potential greenfield release	The Council acknowledges and welcomes the support of Landmark Planning.

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	Ltd	site should establish new Green Infrastructure corridors to link growth to the existing Green Infrastructure. This is supported by my clients who recognise the important function development can perform in delivering green Infrastructure. Part of the land at Sutton Close could provide an extension to the adjoining Coombe Park, providing a benefit to existing and new residents in the area.	
16/12/16	Landmark Planning On Behalf Of Davidson's Developments Ltd	Notwithstanding this positive stance in paragraph 5.50 of the Preferred Options, this has not been carried through fully into the policy, which refers only to protecting and enhancing and does not encourage the delivery of new Green Infrastructure. The policy should be revised to support the creation of new Green Infrastructure as part of new development.	<p>Comment noted.</p> <p>The Council will ensure that wording reflecting the provision of new Green Infrastructure as part of new development is contained within the Pre-Submission Local Plan document.</p>
16/12/16	Landmark Planning On Behalf Of Davidson's Developments Ltd	<p><b>Page 58, Policy 6.2 Housing Density</b></p> <p>It is acknowledged that paragraph 47 of the NPPF allows the Local Planning Authorities to set their own density policies, however it is considered that policy 6.2, is unrealistic in respect of densities to be achieved both within and outside the urban centres. Being overly optimistic in respect of housing density is likely to undermine delivery of the required housing numbers during the plan period. It would also lead to the Borough Council allocating insufficient land through this Local Plan process if high densities are relied upon, potentially rendering this Local Plan ineffective in terms of the soundness tests.</p>	<p>The Council will consider reducing the dwelling per hectare density outside of the Borough's town and district centres and existing urban areas. The Council suggests that the density outside of these areas could be 30 dwellings per hectare rather than 40. It is felt that this density would better reflect the aspirations of the NPPF regarding flexibility.</p>

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		<p>My clients are firmly of the view that densities in the region of 30 dwellings per hectare strike a successful balance between using land efficiently and delivering high quality and well designed developments that create environments where people want to live.</p> <p>Irrespective of the density figure included within the policy, the policy should incorporate a degree of flexibility that recognises that the housing densities should also have regard to the character of the surrounding area.</p>	
16/12/16	Landmark Planning On Behalf Of Davidson's Developments Ltd	<p><b>Page 66, Policy 7.1 Housing Allocations</b>  Policy 7.1 of the draft PO Plan indicates that the Borough Council will allow greenfield releases outside of the urban area where need cannot be met through development within town centres and the Leicester PUA and that potentially Green Wedge Sites will be considered. Whilst in principle this approach is supported, in practice, it will be difficult to ensure that town centre and PUA sites have been 'exhausted' before greenfield sites outside of these areas are considered favourably. The operation of a policy of 'reasonable alternatives' is problematic, time consuming and not a positive way to approach development site selection.</p>	<p>The Council will ensure that the Local Plan complies with policy and guidance set out nationally. The Council is aware that it would not be appropriate to 'put all of its eggs in one basket', therefore will allocate sufficient land to ensure choice and competition in the market.</p>
16/12/16	Landmark Planning On Behalf Of Davidson's Developments Ltd	<p>Notwithstanding the text contained in paragraph 4.7 of the PO, the assessment of all potential residential sites contained within the Sustainability Appraisal indicates that the Sutton Close site (ref OWBC26) scores very well against the selected criteria. Reflecting</p>	<p>Comment noted.</p> <p>The SA has been undertaken in line with the agreed SA framework and assumptions set out in Appendix 4 of the SA Report. Options have been assessed against the baseline and in line with the precautionary</p>

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		<p>the findings of the SHLAA, the only red indicator (other than its greenfield land status) relates to landscape where the assessment notes that the development may have a negative effect in that it might contribute to the coalescence of settlements. No further evidence is produced in respect of this concern and it is noted that it is a concern common to the majority of the 28 sites assessed. The site at Sutton Close is on the Southern Edge of Oadby with no settlement to the south. To the west lies Wigston Magna, however, the development of this site would close the gap between these two settlements only to a very limited degree. Any application for planning permission would be accompanied by a landscape and visual Impact Assessment prepared under the accepted guidelines (GLVIA), which I believe would conclude that the development would have no significant adverse impact on the landscape character of the area.</p>	<p>principle.</p>
<p>16/12/16</p>	<p>Landmark Planning On Behalf Of Davidson's Developments Ltd</p>	<p><b>Page 124, Policy 10.6 Green Wedges</b>  The principle of Green Wedges (and the function they perform) is supported, however, it should also be recognised that a lot of land that is designated as green Wedge lies within sustainable locations and does not clearly meet the objectives of green wedge designation. The Council should ensure that going forward its evidence base is updated to incorporate an appraisal of Green Wedges to ensure that any future Green Wedge policy is robust and can meet the test of soundness.</p>	<p>As part of the Pre-Submission Local Plan production, the Council will be undertaking a Green Wedge review to ensure that the evidence underpinning the Green Wedge policy is robust and up to date.</p>

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16/12/16	NWLDC (North West Leicestershire District Council)	<p>We note that this draft of the plan currently contains no housing or employment targets due to the ongoing HMA-wide HEDNA work not yet being completed. Whilst we understand the reason for this, we would like to place on record our expectation that the next version of your Local Plan will commit to meeting Oadby and Wigston’s proportion of housing and employment needs that will by then be identified within the completed HEDNA.</p> <p>We do not have any further comments on the plan at this stage, although we are obviously committed to continuing to work with yourselves, and the other HMA authorities, in the future.</p>	<p>Comment noted.</p> <p>The Council will continue to work proactively with all of the local authorities within Leicester and Leicestershire.</p>
16/12/16	Gladman Developments	<p>Gladman has taken the opportunity to remind the Council about the four tests of soundness set out in §182 of the National Planning Policy Framework (The Framework), and how by following the wrong strategy upon the release of forthcoming evidence of housing and economic development needs (through the HEDNA), the Local Plan may fail such a test of soundness.</p>	<p>Comment noted.</p>
16/12/16	Gladman Developments	<p>FROM EXECUTIVE SUMMARY:</p> <p><b>OAN and Housing Delivery</b>  Gladman acknowledges that at this time the Council does not have an up to date evidence base upon which to base their Objectively Assessed Housing Need (OAN). The Council will set out their preferred areas for growth once the OAN has been</p>	<p>If further greenfield release sites are required to reflect the outcomes of the HEDNA the Council will identify these within the Pre-Submission Local Plan where appropriate to do so. The Council identified areas of potential greenfield release within the Preferred Options document, these were Land between Stoughton Road and Gartree Road, Oadby; Land at Cottage Farm, Oadby; and, Land west of Welford Road, Wigston.</p>

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		established and Gladman reminds the Council that a broad range of different sites is key in ensuring deliverability and flexibility in identifying reserve sites; should proposed sites fail to deliver. This is essential for the plan to be positively prepared and effective.	The Council is committed in providing the homes that the Borough needs. The Council is aware that the NPPF suggests that Local Plans should be flexible and should not 'put all its eggs in one basket'.
16/12/16	Gladman Developments	<p><b>Green Wedges &amp; Countryside</b> The Council needs to ensure that the Green Wedge and Countryside policies are not overly restrictive and likely to prevent sustainable development coming forward. Gladman submits that the policies should be modified to reflect the presumption in favour of sustainable development unless any adverse impacts would significantly and demonstrably outweigh the benefits; to ensure that the policies meet the tests of soundness.</p>	<p>The Council will identify the required land, including greenfield (where necessary) to provide the correct number of homes that the Borough needs. The Council will be undertaking site assessment evidence base work to ensure that (if required to do so) any land identified for residential development during the Local Plan plan period up to 2036 is sustainable, located in the most appropriate location, viable and deliverable.</p> <p>As part of the Pre-Submission Local Plan production, the Council will be undertaking a Green Wedge review to ensure that the evidence underpinning the Green Wedge policy is robust and up to date.</p>
16/12/16	Gladman Developments	<p><b>Conclusions</b> In light of the above issues and the content of our submission, it is Gladman's conclusion that the Local Plan in its current form would be considered unsound as it is contrary to national policy, not positively prepared, justified or effective.</p>	Comment noted.
16/12/16	Gladman Developments	<p>FROM MAIN DOCUMENT:</p> <p><b>Duty to Cooperate</b> Upon publication of the new HEDNA, Oadby and Wigston will need to demonstrate through the duty to cooperate how they have agreed to meet their own needs within the HMA and how they have made every effort</p>	<p>Comment noted.</p> <p>Alongside the Strategic Growth Plan, under the Duty to Cooperate, the local authorities are working collectively to produce (and all sign up to) an agree a Memorandum of Understanding that illustrates the housing provision target for each of the local authorities within the Leicester and Leicestershire</p>

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		possible to address any potential unmet need from across the other authorities within the HMA. Gladman submits there may well be a substantial unmet need within Leicester, following the publication of the new HEDNA.	Housing Market Area.  The outcomes of the Memorandum of Understanding and the Strategic Growth Plan will be justified by robust and up to date evidence base and Sustainability Appraisal work. All of the local authorities within the Leicester and Leicestershire HMA are committed to working together.
16/12/16	Gladman Developments	<p><b>Sustainability Appraisal/Strategic Environmental Assessment</b></p> <p>Gladman reminds the Council that there have now been a number of instances where the failure to undertake a satisfactory SA has resulted in Plans failing the test of legal compliance at Examination (South Somerset) or being subjected to later legal challenge (Heard vs Greater Norwich Development Plan). At this time, Gladman questions whether extending the Direction for Growth would really be the best option when considered against reasonable alternatives. This would mean that growth has been focussed in the same location from 2006 to 2036. Gladman suggests that spreading this growth and seeking alternative locations for development would be a more suitable and deliverable option.</p>	<p>The Council is committed in providing the homes that the Borough needs. The Council is aware that the NPPF suggests that Local Plans should be flexible and should not 'put all its eggs in one basket'.</p> <p>If further greenfield release sites are required to reflect the outcomes of the HEDNA the Council will identify these within the Pre-Submission Local Plan where appropriate to do so. The Council identified areas of potential greenfield release within the Preferred Options document, these were Land between Stoughton Road and Gartree Road, Oadby; Land at Cottage Farm, Oadby; and, Land west of Welford Road, Wigston.</p>
16/12/16	Gladman Developments	<p><b>OAN And Housing Delivery</b></p> <p>Residents with a desire for a home now should not have to wait for the Direction of Growth to deliver. A persistent past under delivery of housing led, the Inspector in a recent appeal, to deem it necessary to add a 20% buffer to the housing supply for Oadby and Wigston. This was supported in the court</p>	Comment noted.

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		judgement of Oadby and Wigston versus Bloor Homes Limited, where the judge found no reason to disagree with the inspector. This is further evidence that the Local Plan should spread the growth to increase delivery and significantly boost housing supply.	
16/12/16	Gladman Developments	Gladman suggests a range of sites is more appropriate when distributing the growth. This would help to conform with the Framework by significantly boosting housing supply. The Council should be mindful that to maximise housing supply the widest possible range of sites, by size and market location, are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. A wider variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land which in turn increases housing delivery.	Comment noted.
16/12/16	Gladman Developments	Currently, the Council is proposing to release only sufficient greenfield sites to meet the residual housing requirement. To ensure a positive approach, the Council should plan for additional sites to provide flexibility in the plan. Gladman suggests that Local Plans should ensure that there is sufficient contingency within their allocations in order to ensure the minimum five-year housing land supply can be demonstrated and improve the likelihood of the housing requirement being met throughout the plan period through a genuinely plan led approach. Gladman would	The Council will be undertaking site assessment evidence base work to ensure that any land identified for residential development during the Local Plan plan period up to 2036 is sustainable, located in the most appropriate location, is viable and deliverable.

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		<p>note, in this regard, the findings in the Inspector’s report into the Stratford-on-Avon Core Strategy, published in June 2016. In that Report, at paragraph 71, the Inspector finds that to ensure the plan is positively prepared in line with the NPPF, the 10% reserve for housing sites should be increased to 20%. Similarly, the emerging plan for Redcar and Cleveland, published in May 2016, at policy H1 seeks to identify a buffer of around 20% additional housing land on top of the net minimum requirement.</p>	
16/12/16	Gladman Developments	<p><b>Green Wedges and Countryside</b> Policies 10.6 and 10.7 seek to protect the Green Wedges and Countryside of Oadby and Wigston. The Green Wedges and land outside defined limits to development will be considered Countryside. This policy seeks to define settlement boundaries suggesting development would be permitted within the Countryside as long as there is a justifiable need which outweighs the impacts. To be more consistent with paragraph 14 of the Framework Gladman suggests this be reworded to fully reflect the presumption in favour of sustainable development and more clearly to allow a decision maker to make a balanced decision.</p> <p>Gladman would object to the use of settlement limits if these would preclude otherwise sustainable development from coming forward. The Framework is clear that development which is sustainable should go ahead without delay. The use of settlement</p>	<p>Policy 10.7 as worded does not apply ‘blanket’ protection for the countryside. The policy rightly suggests that there may be development required in countryside locations, however suggests that development will only be permitted should the justifiable need outweigh any adverse impacts. The Council is of the opinion that the policy as currently drafted is compliant with national policy and guidance.</p>

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		<p>limits to arbitrarily restrict suitable development from coming forward on the edge of settlements would not accord with the positive approach to growth required by the Framework. Instead of restrictive development boundaries Gladman suggests criteria based development management policies should be introduced to enable development to come forward in sustainable locations.</p> <p>Paragraph 17 of the Framework, bullet point 5, states that plan-making and decision-taking should recognise the intrinsic character and beauty of the countryside not, that it be protected for its own sake. The High Court Judgment by Lang J (Telford and Wrekin v Secretary of State and Gladman Developments)<sup>3</sup> states in para 47 that the NPPF does not include a blanket protection of the countryside for its own sake, such as existed in earlier national guidance (e.g. Planning Policy Guidance 7), and regard must also be had to the other core planning principles favouring sustainable development, as set out in NPPF 17. Any policy for the protection and enhancement of the environment should therefore be established in light of the national policies contained in the Framework, particularly paragraphs 109 to 125.</p> <p>Gladman would object to the use of these green wedges if they would prevent otherwise sustainable and deliverable</p>	
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		housing sites coming forward to meet the boroughs needs. The Council should ensure there is robust evidence to warrant the inclusion of green wedges and be prepared to review these boundaries where they are deemed to be unnecessary; to ensure a flexible approach towards meeting housing requirements. Further, Gladman submits that development should be able to take place within green wedge locations that do not demonstrably contribute to their associated functions.	
16/12/16	Gladman Developments	<p><b>CONCLUSIONS</b></p> <p>Through these representations Gladman has highlighted several potential soundness issues should the Oadby and Wigston Local Plan be progressed in its current form. To be considered sound at Examination, the Local Plan needs to meet all four of the soundness tests set out in paragraph 182 of the Framework.</p> <p>A failure to plan for the full OAN of Oadby and Wigston could lead to the plan not being positively prepared, justified, effective or consistent with national policy. Through this response Gladman has submitted suggestions for how the Council should plan to meet the OAN once published to ensure the plan meets the tests of soundness. It is hoped that these comments are helpful to the Council in preparing the next stages of the Oadby and Wigston Local Plan.</p>	Comment noted.
16/12/16	Canal & River Trust	Representations	The Council acknowledges and welcomes the support of the Canal and Rivers Trust.

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		<p><b>Chapter 2- Spatial Portrait Para 2.39, Page 20-21</b></p> <p>The Canal &amp; River Trust supports the aim of seeking to enhance the character of Kilby Bridge whilst protecting its environmental and biodiversity qualities and identifying opportunities to provide improved access to the Grand Union Canal. The Trust is owner/operator of the canal and we also own land on both sides of the canal, to the west of the A5199 road bridge (Br. 87), including our existing depot site on the north side of the canal.</p>	
16/12/16	Canal & River Trust	<p><b>Chapter 5- Healthy Communities Policy 5.2, Page 36</b></p> <p>The Canal &amp; River Trust notes the Council's aspirations to promote healthy living and the desire to encourage healthy activities such as walking and cycling. Canal towpaths can play an important role in encouraging healthier lifestyles by providing traffic-free sustainable routes for walkers and cyclists whether as a commuting route to access facilities or a recreational route/resource which offers local communities an accessible link to the surrounding countryside.</p>	<p>Comment noted.</p> <p>The Council will ensure that the canal towpaths are referred to within the policy or within the supporting text to the policy. The Council is aware of the important contribution that canal towpaths have on the health and well being of the Borough's residents and visitors alike.</p>
16/12/16	Canal & River Trust	<p><b>Chapter 7 Allocations &amp; Regeneration Opportunity Areas (Para 7.10, Page 69)</b></p> <p>We note the support for leisure and tourism in the Kilby Bridge area, and we consider that there is potential to look at improved access to the canal as a part of this. We consider</p>	<p>The Council acknowledges and welcomes the support of the Canal and Rivers Trust.</p>

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		that the Council's approach within Policy 7.2 is appropriate in not seeking to identify specific sites or types of waterway-associated development, but rather simply providing in-principle support for leisure, recreation and tourism proposals within the village envelope.	
16/12/16	Canal & River Trust	<p><b>Chapter 7 Allocations &amp; Regeneration Opportunity Areas (Policy 7.2, pp. 69-70)</b></p> <p>The Canal &amp; River Trust supports the inclusion of Policy 7.2. The Trust's existing depot site represents a potential development opportunity within the village envelope. We consider that there may be scope to incorporate improved access to the canal, boater facilities etc. as part of a redevelopment of this site for residential development, and therefore contribute positively to meeting the aims of Policy 7.2.</p> <p>The policy identifies a range of uses as being acceptable in principle within the village envelope, with explicit in-principle support given for residential, business (in the form of small scale starter units) and leisure/ recreational and tourism. Our understanding of the policy is that it is intended to give support in principle to any of these uses within the village envelope, and does not seek to restrict proposals on individual sites to any particular use within those listed. On this basis we consider Policy 7.2 to be appropriate.</p>	<p>The Council acknowledges and welcomes the support of the Canal and Rivers Trust.</p> <p>The Council is not seeking to specify areas of particular uses within the Kilby Bridge village envelope. The Council will consider each proposal on its merits within the Kilby Bridge village envelope as long as it is not contrary to the principles set out in the relevant Local Plan policies.</p> <p>The Council acknowledges and welcomes the support of the Canal and Rivers Trust.</p>
16/12/16	Canal & River Trust	<b>Chapter 11- Delivery Plan (Policy 11.1, pp. 131)</b>	The Council acknowledges and welcomes the support of the Canal and Rivers Trust.

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		<p>There is clear support within the Plan for promoting healthy living and for new development to provide encouragement for healthy activities such as walking and cycling. Canal towpaths can play an important role in encouraging healthier lifestyles by providing traffic-free sustainable routes for walkers and cyclists whether as a commuting route to access facilities or a recreational route/resource which offers local communities an accessible link to the surrounding countryside.</p> <p>Where development proposals seek to rely on the canal towpath to either provide commuting routes for future occupiers to access facilities or as a recreational route/resource for them, there is the potential that additional use of the towpath will create an increased maintenance liability for the Trust and a need to consider improvements to the towpath surface to cope with this use, or to ensure that it is brought up to a standard to genuinely encourage such use. We would look to secure developer contributions to cover such costs where appropriate and justified. We therefore consider that the Council's proposed Infrastructure Delivery Plan should identify canal towpath improvements as infrastructure measures that potentially may be required to make new growth acceptable in planning terms, and to enable new development proposals to meet the requirements of Policy 5.2 of the Plan.</p>	<p>Comment noted.</p> <p>Where relevant, the Council will refer to the maintenance of the canal tow paths within the Infrastructure Delivery Plan.</p>
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16/12/16	Leicester City Council	<p>The document focuses on identifying the preferred options for the District and considers how the Local Plan needs to respond to them. However, we note that the emerging Local Plan document does not yet include all the information that it will need to include. For instance, it does not yet specify the overall number of houses that will be needed in the Local Plan as the evidence (HEDNA) is still being prepared. The document also does not identify preferred site allocations. It is stated that this will be done in the next stage of Local Plan consultation - Publication. This approach naturally limits the extent and scope of the comments that we can make at this time.</p>	Comment noted.
16/12/16	Leicester City Council	<p><b>Local Plan Position Statement</b>  The City Council welcomes the commitment in the plan to continue to engage constructively with other local planning authorities in Leicester and Leicestershire on plan preparation and planning strategy across the Housing Market Area (HMA), including on the amount and location of future housing and economic growth. We look forward to continue to work co-operatively on these issues, through further iterations of the plan, to ensure that, amongst other things, the housing and economic growth needs of Oadby &amp; Wigston and the wider HMA are addressed.</p>	<p>The Council is committed to working alongside all of the local authorities within the Leicester and Leicestershire HMA under the Duty to Cooperate.</p>
16/12/16	Leicester City Council	<p><b>Chapter 2 – Spatial Portrait</b>  Paragraph 2.32  This paragraph states that:  <i>“The Eastern District Distributor Road was</i></p>	Comment noted.

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		<p><i>originally a proposed transport allocation agreed by Leicestershire County Council and Leicester City Council to complete the City's outer ring road between the M1 and M69 motorways and the A47, in Oadby. Eastern District Distributor Road, it was considered, would help to relieve congestion on the A6 between Oadby and Leicester. However, the proposal has not come to fruition despite the route being safeguarded in a number of previous plans. It is now even less likely to come forward as the Eastern District Distributor Road, as proposed, because some of the route has been affected by development outside of the Borough of Oadby and Wigston."</i></p> <p>The City Council would encourage continued support for retaining the Eastern District Distributor Road scheme until such a time that decisions have been made about how to address the problems of access &amp; traffic movements around the Eastern side of Leicester as highlighted by the Joint Oadby &amp; Wigston, Harborough DC &amp; Leicester Local Plan Transport Evidence study (Edwards &amp; Edwards Study) and in advance of emerging Strategic Transport Study currently being prepared.</p>	
16/12/16	Leicester City Council	<p><b>Chapter 4 – Sustainable Places</b>  Policy 4.2: Spatial Strategy for Development in the Borough  This draft policy includes the following statement:-  <i>'work in partnership with other agencies and</i></p>	<p>Comment noted.</p> <p>The wording will be amended to reflect the importance of working with neighbouring local authorities on cross boundaries issues.</p>

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		<p><i>organisations to identify and coordinate the provision and funding of infrastructure and facilities (including Green Infrastructure) required to meet the needs of planned development and to safeguard and enhance key existing biodiversity, environmental, social, cultural and economic assets;'</i></p> <p>It should also refer to the need to work with adjoining authorities on joint infrastructure needs that arise beyond respective administrative boundaries.</p>	
16/12/16	Leicester City Council	<p><b>Chapter 5 – Healthy Communities</b>  <b>5.6 Open Space, Sport and Recreation Facilities</b>  The City Council is concerned that there is no Playing Pitch Strategy showing the needs for sports provision in the District. There is a flow between the borough and the city for Cricket provision. Uplands Park in Oadby is in use by a city based Cricket team. Oadby Owls football team play half their games at Judge Meadow Community College and De Montfort University Rugby Union team have also recently played in Oadby and Wigston. The City council requests that this level of sporting provision is continued to be provided in the District and Oadby and Wigston District Council work with the City to ensure adequate sporting provision in the future.</p>	<p>The Council is currently in the process of producing a Playing Pitch Strategy. Once published the Playing Pitch Strategy will evidence the Council's Pre-Submission Local Plan.</p>
16/12/16	Leicester City Council	<p><b>Chapter 7 – Allocations and Regeneration Opportunity Areas</b>  Policy 7.1 – This policy states that:-  <i>"Due to the compact urban nature of the</i></p>	<p>Alongside the Strategic Growth Plan, under the Duty to Cooperate, the local authorities are working collectively to produce (and all sign up to) an agree a Memorandum of Understanding that illustrates the housing provision target for each of the local</p>

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		<p><i>Borough, sites located outside of the current urban extent, such as the countryside and green wedges are vitally important to the Borough's and its resident's wellbeing, therefore only sufficient sites to meet the residual housing requirement will be released".</i></p> <p>It will be important that the outcomes of the HEDNA and the emerging Strategic Growth Plan are fully integrated into the Local Plan. This will include working with the other authorities in the HMA to help address any unmet need arising within the HMA. Additionally the Local Plan should include the agreed trigger mechanism wording which sets out the requirement to undertake an early review or partial review of the Local Plan should the scale/spatial distribution of development change significantly from that set out in the plan.</p> <p>As there are no site allocations at this stage the City Council is unable to assess the implications of any potential development that there may be on green spaces and wedges adjoining the City. The City Council would welcome working with Oadby and Wigston on the next iteration of the plan to assess any possible impacts.</p> <p>Direction for growth The City Council as the Highway Authority would be keen to be included as part of the Master planning and planning application</p>	<p>authorities within the Leicester and Leicestershire Housing Market Area.</p> <p>The Council will incorporate the Trigger Mechanism policy that has been agreed by all local authorities within the Leicester and Leicestershire HMA into the Pre-Submission Local Plan.</p> <p>The Council will continue to work proactively with all of the local authorities within Leicester and Leicestershire.</p> <p>The Council will ensure that any proposals for development within the Local Plan are justified by robust highway and transport evidence. The Council (alongside site promoters) will work with Leicestershire County Council as the highway authority for the Borough, however will also work with neighbouring local authorities, such as Harborough District Council and Leicester City Council.</p>
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		process of the Wigston Direction for Growth Area.	
16/12/16	Leicester City Council	<p><b>Policy 7.5 – Wigston Direction for Growth Area</b>            We suggest that this policy also needs to include as part of on-site requirements, access to attractive and well connected sustainable modes of transport as well as infrastructure to encourage the adoption of Ultra Low Emission Vehicles.</p>	Comment noted.
16/12/16	Leicester City Council	<p>Policies 7.6 &amp; 8.4.2 mention the needs for joint working between O&amp;W and Leicestershire County council on highways infrastructure.</p> <p>Joint working with Leicester City Council will also be necessary as the neighbouring highways authority where proposed additional transport infrastructure is cross boundary in nature, where major development is located close to the city boundary or will cause significant highways impact within Leicester.</p>	<p>Comment noted.</p> <p>The wording will be amended to reflect the importance of working with neighbouring local authorities on cross boundaries issues.</p>
16/12/16	Leicester City Council	<p><b>Chapter 8 – Economic Prosperity</b>            Policy 8.4.1 – Protecting Existing Employment Sites. This policy states that:-  <i>“Proposals to change the use of land or buildings from B1, B2 or B8 will only be considered acceptable if they clearly demonstrate that the alternative use (s): Conform to policies and principles set out within the Council’s Employment Sites Supplementary Planning Document.”</i></p> <p>Supplementary Planning Documents should</p>	<p>Comment noted.</p> <p>The Council will consider the opportunity to incorporate the principles of relevant employment land evidence base or Supplementary Planning Documents into the relevant Local Plan policies.</p>

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		<p>be supplementary to policies in the Local plan and should not set new policy. The Employment Sites SPD on your website is dated 2011 and refers to Planning Policy Statements, which were adopted before the NPPF. The SPD is also based on old Employment Land studies such as PACEC 2008. If this document is still relevant, could the Local Plan present an opportunity to incorporate the relevant principles of the Employment Land SPD into the Local Plan?</p>	
16/12/16	Leicester City Council	<p><b>Chapter 11 – Delivery Plan</b>            Para 11.1 – We will consider future developments and the likely impact on the City and seek a range of appropriate mitigation measures. Developer contributions may need to be agreed between the City Council, if mitigation measures are required for any adverse impacts are identified on the transport and highway network based on the findings of robust transport modelling.</p> <p>New growth should be considered in conjunction with neighbouring authorities and the County Council, as a mechanism for attracting new infrastructure funding.</p> <p>New growth will impact on the City highway network for employment and leisure activities which will need to be addressed and mitigated as appropriate.</p>	<p>Comment noted.</p> <p>The Council will continue to work proactively with all of the local authorities within Leicester and Leicestershire.</p>
16/12/16	Leicester City Council	<p>Para 11.3 – Lists the potential infrastructure that will be needed to support new development and reference is made to:</p>	<p>Comment noted.</p> <p>The Council will continue to work proactively with all of</p>

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		<p>“Highways and public transport improvements”. We also note the intention to develop a separate “Infrastructure Delivery Plan”. However, we would expect the next stage of the plan to include a more detailed Infrastructure list which highlights the highway improvements and measures that are being proposed, how they are going to be funded and the partners necessary to work with to deliver this improvements.</p> <p>As the neighbouring highways authority the Council will expect to be closely engaged with Oadby and Wigston when this list is being prepared.</p>	<p>the local authorities within Leicester and Leicestershire.</p>
16/12/16	Leicester City Council	<p>Para 11.4 – states that:- ‘Joint working with neighbouring local authorities and other agencies such as utility companies or service delivery partners will be a key element to identify and to successfully deliver necessary infrastructure.’</p> <p>This statement is supported.</p>	<p>The Council acknowledges and welcomes the support of Leicester City Council.</p>
16/12/16	Leicester City Council	<p><b>Education</b> Opportunities clearly exist across the whole Local Plan for synergies and partnerships in education for young people and adult learners including work and training opportunities and for benefiting their health and well-being, which Leicester City Council is very happy to explore further with partners.</p>	<p>Comment noted.</p>
16/12/16	Leicester City Council	<p><b>Sustainability Appraisal</b> The preferred options sustainability appraisal assesses a long list of sites despite these not being identified in the Preferred Options</p>	<p>Comment noted.  SA is required to assess the proposed sites and reasonable alternatives. SA is required to assess the</p>

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		document. It is not possible to provide any comments on these sites in the absence maps of the sites that have been considered. However, the sustainability appraisal appears not to have short listed any sites at this stage and we would expect to be able to make representations on sites including discounted sites before they get to submission stage.	proposed sites and reasonable alternatives. Once preferred options are identified, the SA will include the Council's reasons for selecting or not selecting each site.
16/12/16	Trinity Methodist Church, Oadby	There are at least three occasions in the Local Plan where policies or statements about Oadby Town Centre are referenced to the Oadby Town Centre Masterplan and Local Development Orders (see above – chapter 7 page 67 Policy 7.1, also page 4 paragraph 5 and page 100 paragraph 9.24). This seems to ignore the fact that the Brooksby Square LDO was rejected by the Borough Council's Development Control Committee on 12 May 2016. This Local Plan document should therefore make it clear that any reference to a LDO in Oadby excludes the Brooksby Square LDO. By the Council rejecting the LDO, it follows that the proposals for Brooksby Square contained in the Oadby Town Centre Masterplan also no longer have any standing. The Plan should therefore be amended to clarify these points.	<p>The Town Centres Area Action Plan is a current and up to date development plan document. The Council is seeking to retain the allocations within the centres of both Oadby and Wigston.</p> <p>Local Development Orders are a tool to bring forward development; they are not a tool for allocating or de-allocating land. Local Development Orders essentially grant planning permission for a site and make the sites more attractive to the development industry.</p> <p>The Council has to actively allocate and identify land for housing (amongst other uses) to ensure that it complies with national policy and guidance. Whilst there may be need to allocate greenfield sites within the Local Plan for housing, national policy and guidance seeks to concentrate development within existing sustainable locations.</p>
16/12/16	Leicestershire County Council	It is recognised that at this stage the Local Plan does not contain any specific housing or employment land numbers or site allocations. Rather it provides text/policies that indicate how allocations will be dealt with as further matters are resolved.	Comment noted.
16/12/16	Leicestershire County Council	Transport	The Council acknowledges and welcomes the support of Leicestershire County Council.

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		<p>The County Highway Authority (CHA) is broadly supportive of the proposed spatial approach set out in the Preferred Options Local Plan for the allocation of new housing within the Borough. Seeking to locate new development in areas where there are already an established range of facilities and good public transport links provides the greatest opportunities to minimise the impacts of car travel on the area's road network as its population (and that of wider County and Leicester City) continues to grow.</p>	
<p>16/12/16</p>	<p>Leicestershire County Council</p>	<p>It will still be important, however, to ensure that the Local Plan is underpinned by robust transport evidence, and in that respect the CHA welcomes the work so far undertaken by the Borough Council. In taking that work forward<sup>(1)</sup>, it will be important to ensure that the transport impacts of all growth planned within the Borough are appropriately and reasonably considered (including to assess the impacts of non-allocated housing sites of 10 or less dwellings). This will ensure that, as necessary, supporting transport infrastructure measures can be properly identified. In this respect the CHA would welcome the opportunity to explore with the Borough Council whether and if it would be possible to include in the 'final' version of the Local Plan a policy that is more explicit about seeking to secure (CIL compliant) developer contributions into a funding pot that could, for, example help to deliver a piece of infrastructure that would address the</p>	<p>The Council is committed to working with Leicestershire County Council as the highways authority, in relation to, not only the Local Plan, but also the evidence that underpins the Local Plan. The Council is currently working with the highways authority, as well as neighbouring local authorities in producing highways and transport evidence base to support the Local Plan process.</p>

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		cumulative impacts of numerous, individual developments. (It is potentially possible that this approach might need to cover the need for potential impacts in areas adjoining the Borough and vice-versa with adjoining Local Plans.)	
16/12/16	Leicestershire County Council	Subject to further discussions, the further work might provide a useful opportunity to assess the future need for and role of any transport link along the line of the current Eastern District Distributor Road reservation.	Comment noted.  The Council will continue to work proactively with all of the local authorities within Leicester and Leicestershire.
16/12/16	Leicestershire County Council	The CHA also broadly welcomes the approach to sustainable transport initiatives and would welcome the opportunity to hold further discussions on this matter and to refine the wording of the 'final' Plan text policy(ies) as necessary.	Comment noted.  The Council will continue to work proactively with all of the local authorities within Leicester and Leicestershire.
16/12/16	Leicestershire County Council	Flood Risk Management  In line with current government policy, (Sustainable drainage systems: Written statement - HCWS161, December 2014), Sustainable Drainage Systems (SuDS) should be prioritised for managing surface water flows. Therefore appropriate space allocation for SuDS features should be included within development sites. These features should look to introduce blue green corridors to improve the bio-diversity and amenity of new developments, and surrounding areas where possible.  Often ordinary watercourses and land drainage features (including streams, culverts	Comment noted.

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		and ditches) form part of development sites. LCC recommend that existing watercourses and land drainage (including watercourses that form the site boundary) are retained as open features along their original flow path, and are retained in public open space to ensure that access for maintenance can be achieved.	
16/12/16	Leicestershire County Council	<p><b>Communities &amp; Well Being Service</b></p> <p>Any future local plans should involve a willingness in the exploration of opportunities to:</p> <p>Share facilities with other services, e.g doctor's surgeries, other leisure provision, so that efficiencies of scale could be achieved. This may include classroom space as we also manage Adult learning services and have had some success in adapting some of our larger libraries to incorporate flexible learning space, e.g at Wigston Magna library.</p>	Comment noted.
16/12/16	Leicestershire County Council	Ensuring that there is high grade broadband accessibility at venues as people are increasing using libraries to access IT; whether that be through IT that is provided or through using their own mobile devices to work or engage online. The revenue implications of this are always an issue, so bringing together a range of service to form larger community spaces so that these costs can be shared will be essential.	Comment noted.
16/12/16	Leicestershire County Council	<p><b>Chapter 2- Spatial Portrait</b></p> <p>Paragraph 2.21; % economically active and unemployed would be helpful to have the</p>	<p>Comment noted.</p> <p>The Council will ensure that the Pre-Submission Local Plan document has a Spatial Portrait that is correct</p>

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		<p>comparison with the rest of Leicestershire and UK.          Paragraph 2.23; there are a number of young people who reach adulthood with no qualification or skills – how many %?          Paragraph 2.24; high % of residents in borough with NVQ4 qualifications or above – how many? Figure included for no qualifications.          Paragraph 2.25; don't understand the link between 2.24 and 2.25 as a result of this frequent interest for the use of land within identified employment areas for non-employment uses?          Page 31, Policy 4.2 identifies land for office space – is there a demonstrable need for this given the amount vacant office space in Leicester?</p>	<p>and up to date and reflects the current situation within the Borough, however also compares it to other local authority areas within the Leicester and Leicestershire Housing Market Area.</p>
16/12/16	Leicestershire County Council	<p><b>Chapter 5- Healthy Communities</b></p> <p>Paragraph 5.3; not sure if it fits in this chapter but there is no mention in the document of Broadband and the need to get developers to install. Note any development above 30 houses Open reach will put it in free of charge but below 30 houses there is a need to get developers to install Fixed fibre to the premise with speeds capable of 30mbps.</p>	<p>Comment noted.</p> <p>The Council will seek to reference Broadband where relevant within the Pre-Submission Local Plan document.</p>
16/12/16	Leicestershire County Council	<p><b>Paragraph 5.8 Public Realm</b>; could be more radical and suggest shared spaces which do away with all signage and curb lines and create a flat more useable space for events and a visually more attractive environment.</p>	<p>Comment noted.</p>
16/12/16	Leicestershire County Council	<p><b>Chapter 6- Housing Delivery</b></p>	<p>Comment noted.</p>

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		Policy 6.1; reference is made to developers liaising on all new large scale residential developments (11 dwellings or more) in relation to housing mix. The cumulative impact from sites of ten dwellings needs to be assessed, particularly from a transport perspective.	
16/12/16	Leicestershire County Council	<p><b>Chapter 7- Allocations &amp; Regeneration Opportunity Areas</b></p> <p>It is noted that the number and location of greenfield sites to be released as allocations will be determined once the full extent of the Borough's housing needs is identified. The focus on Town Centre development opportunities, development opportunities within the Borough's Principal Urban Area, and the Wigston Direction for Growth Area is recognised and considered appropriate.</p>	The Council acknowledges and welcomes the support of Leicestershire County Council.
16/12/16	Leicestershire County Council	<p><b>Chapter 8- Economic Prosperity</b></p> <p>Consider more detail is required about how economic growth is going to be delivered in the Borough. Reference is made to promoting balanced economic growth and to the Council's new Economic Development Strategy (2015 to 2020); but no reference is made to the Strategic Economic Plan (SEP) and the priority sectors. Significant focus is placed on retail; would like to see greater profile for the priority sectors.</p>	<p>Comment noted.</p> <p>The Council will investigate the opportunity of incorporating priority sectors within to the Local Plan in relation to economic growth.</p> <p>The Council will ensure that reference is made to the Strategic Economic Plan where relevant.</p>
16/12/16	Leicestershire County Council	Paragraph 8.20; do these figures account for growth in housing in the Direction for Growth? How have they allowed for growth in on-line shopping in working out these	<p>Comments noted.</p> <p>Yes, but with the qualifications that the comparison of data over time has to be treated with some caution.</p>

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		<p>figures?</p>	<p>The 2011 Census was used to derive base population data informing the 2016 Retail Study and is consistent with typical approaches adopted in the writing of such evidence base documents. Population is projected forward having regard to the 2014-based Sub-National Population Projections [SNPP] for the Oadby &amp; Wigston area<sup>1</sup> adjusted to be consistent with HEDNA. Population is projected forward to 2036 using 2014-based SNPP.</p> <p>SNPPs are not forecasts and, as such, do not attempt to predict the impact that government policies, development aims, changing economic circumstances or other factors (whether in the UK or overseas) might have on demographic behaviour. If any recent changes have not yet affected the population estimates or trend data upon which the projections are based, then those changes will not affect the projections. They simply provide the population size and age and sex structure that would result if the underlying assumptions about future fertility, mortality and migration were to be realised.</p> <p>The 2010 Core Strategy requires approximately 450 new homes to be provided in the <i>Direction for Growth</i> area up to 2026. The Core Strategy refers to establishing one <i>Direction for Growth</i> adjacent to the Principal Urban Area in Wigston, to assist in meeting the Borough's housing allocation. Figure 3 of the Core Strategy illustrates the contribution to be made by a <i>Direction for Growth</i> (452). Paragraph 5.4 of the Core Strategy states that:</p> <p><i>'The Spatial Strategy makes provision for a minimum</i></p>
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			<p><i>of 1,800 new dwellings (90 dwellings per annum) between 2006 and 2026. The need for this amount was fully evidenced through the process of the preparation of the revoked East Midlands Regional Plan and the amount is consistent with Oadby and Wigston Borough Council's representations made in respect of this'.</i></p> <p>Appendix 1 of the revoked East Midlands Regional Plan (EMRP) (2009) quantifies regional housing requirements, which takes account of trends informed by DCLG 2004-based household projections and Paragraph 3.1.2 notes that housing numbers in the Regional Plan take account of anticipated growth based upon past trends and future prospects.</p> <p>The Leicester and Leicestershire dpa requirement of the EMRP is ahead of the CLG trend, but Appendix 1 does not provide an explicit answer as to whether the Oadby and Wigston allocation is in excess of trend-based requirement.</p> <p>The Housing and Economic Development Needs Assessment (HEDNA) sets out an Objectively Assessed Need (OAN_ for Oadby and Wigston of 155 dpa (2011 to 2036), which is significantly greater than the 90 dpa set out in the EMRP and translated into the Core Strategy (see Figure 3 of the Core Strategy) 129 dpa (of the 155 dpa) is said to be the demographic need. This indicates strongly that the HEDNA (and therefore the 2016 Retail Study) is working to population projections that are in excess of those which informed the Core Strategy and identification of the Wigston Direction for Growth as a location with the potential to accommodate 450 of the 1,800 dwellings</p>
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			<p>over the period 2006 to 2026.</p> <p>This all points to the strong likelihood that the 2016 Retail Study more than accounts for retail capacity generated by new housing the in the Wigston Direction for Growth area, given that the Direction for Growth is intended to meet a trend-based housing requirement; a trend-based requirement that is updated by the latest SNPP data and captured in the HEDNA and the Retail Study.</p> <p><i><sup>1</sup>An adjustment to the population growth rate made for Zones 1, 2 and 3 of the Retail Study Area adopted (which broadly represent Oadby and Wigston Borough) to take account of migration trends over the period 2005 to 2015. This is based upon and to ensure consistency with the Leicester and Leicestershire Housing and Economic Development Needs Assessment (HEDNA).</i></p> <p>The base retail expenditure figures are provided by Experian. Experian provides estimates of the year-on-year change in the proportion of expenditure directed to Special Forms of Trading [SFT] – on-line, catalogue and mail order; an upward trend in both the convenience and comparison retail sectors. The Council’s consultant, Lichfields, adopts the Experian trend data, but makes adjustments to reflect the fact that (particularly in the convenience retail sector via home delivery) a proportion of on-line sales are sourced from physical stores and this element of SFT is reasonably considered as contributing to the capacity for retail floorspace. Lichfields’ work reflects the upward trends in SFT modelled by Experian but is cognisant of the fact that this is not entirely divorced</p>
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			from the capacity for physical retail floorspace.
16/12/16	Leicestershire County Council	<p><b>Chapter 9- Town Centre Development</b></p> <p>Paragraph 9.7; mentions need to maintain high proportion of retail units, how does this fit with growth in on-line sales? Also need to investigate increasing A4 figures to try and encourage people to use the town centre in the evening using restaurants etc.</p> <p>Consider the inclusion of a policy to limit the amount of charity shops as a % given they have a reputation of providing a negative impact on the appearance of the town centre.</p>	Comment noted.
16/12/16	Leicestershire County Council	Paragraph 9.7 Security Shutters; good examples exist of shutters with high quality designs on them such as Robinsons Jewellers in Lutterworth (which includes an image of an antique clock).	Comment noted.
16/12/16	Leicestershire County Council	Paragraph 9.6 Shop fronts; Consider the introduction of a palette of colours (usually associated with heritage areas but could still work) to stop cheap plastic signs being introduced and to create a sense of uniformity.	Comment noted.
16/12/16	Leicestershire County Council	<p><b>Waste Management</b></p> <p>Waste Management highlights that any development in the Borough of Oadby &amp; Wigston is likely to have a detrimental effect on the civic amenity infrastructure. Civic amenity sites provide an on demand service to which at peak times there has been an evidenced capacity deficiency at some civic amenity sites. Appropriate mitigation</p>	<p>Comment noted.</p> <p>The Council will continue to work proactively with all of the local authorities within Leicester and Leicestershire.</p>

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		measures, which may include land for and development of or contributions towards land for and development of a new civic amenity site and / or waste transfer station to off-set the increased demand placed on the waste infrastructure, need to be recognised in this plan because it will need to be considered when managing the forthcoming growth in and around Oadby.	
16/12/16	Leicestershire County Council	<p><b>Education</b></p> <p>Where housing development is proposed within any settlement and the catchment schools are readily capable of expansion, then the County Council will seek a developer contribution in accordance with the yield rates and cost multipliers set out in our Planning Obligations Policy</p> <p>Where housing growth is proposed in settlements where it is not possible to economically extend the local school, or other planning constraints may warrant consideration, so that any extension/ adaptations would be in excess of funding provided by the application of cost multipliers or yield rates, then the County Council would expect that developers would (proportionately ) meet the full cost of school expansion – this would deal with issues relative to constrained sites and conservation areas.</p>	<p>Comment noted.</p> <p>The Council will continue to work proactively with all of the local authorities within Leicester and Leicestershire.</p>
16/12/16	Leicestershire County Council	In either of the above circumstances, it is expected that developers would also meet the costs of transitional arrangements including transport provision until such time	Comment noted.

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		as places are available in the local school (following adaptation).	
16/12/16	Leicestershire County Council	For developments that are above the statutory walking distances or where an available (safe walking) route to a school did not exist it is likely that the full cost of transporting any pupils arising from the development to the nearest school will be claimed.	Comment noted.
16/12/16	Leicestershire County Council	Where the local schools are not capable of expansion, for whatsoever reason (this could be attributable to site/planning constraints or educational matters) then the developer would be expected to meet the cost of expansion of any other local school (net of any surplus places) should this be necessary, and the full cost of transport if necessary.	Comment noted.  The Council will continue to work proactively with all of the local authorities within Leicester and Leicestershire.
16/12/16	Leicestershire County Council	<b>Strategic Assets (Policy 4.1, Para 8.49, Policy 6.1)</b>  Broadly the Vision and Objectives of the Plan are supported, in particular the aspiration to meet the needs of business, the housing needs of the whole community and the infrastructure required to meet the needs of the community and a growing economy. The objective of promoting a prosperous economy is seen as key to the delivery wider aspirations of the plan.	The Council acknowledges and welcomes the support of Leicestershire County Council.
16/12/16	Leicestershire County Council	Policy 4.1 is supported in that it reflects the guidance at Para 14 of the NPPF but needs to clearly state that only in circumstances where (i) “the adverse impacts of the development outweigh the benefits”, and (ii)	The Council will ensure that the wording reflects the policy and guidance as set out within the NPPF.

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		the proposal is contrary to adopted policy would development be resisted.	
16/12/16	Leicestershire County Council	Para 8.49 outlines a strategy for the development and protecting of employment land going forward. The policy has considerable scope for expansion. In particular reference should be made to the potential of redeveloping older lower quality premises with limited economic life and facilitating the development of sites adjoining established areas of employment, on an opportunity basis, in order to meet the future employment needs of the Borough.	Comment noted.
16/12/16	Leicestershire County Council	Further policy should reflect the need to create opportunities for new businesses to establish, particularly in priority sectors in order that the plan aligns with the LLEP's Strategic Economic Plan.	Comment noted.
16/12/16	Leicestershire County Council	<p><b>Housing Delivery</b></p> <p>A clear statement needs to be made in Chapter 6 to the effect that the Plan will deliver the objectively assessed needs of the Borough including an allowance for additional housing that can't be met by neighbouring authorities under the duty to co-operate. The use of the HEDNA outcomes in the determination of OAN is strongly supported.</p> <p>Policy 6.1 is welcomed in so far as it encourages the provision of housing to meet the needs of all sections of the community. However, the levels of housing provision within sectors should be supported through the needs assessment with affordable</p>	<p>The Council is committed in providing the homes that the Borough needs. The Council is aware that the NPPF suggests that Local Plans should be flexible and should not 'put all its eggs in one basket'. Alongside the Strategic Growth Plan, under the Duty to Cooperate, the local authorities are working collectively to produce (and all sign up to) an agree a Memorandum of Understanding that illustrates the housing provision target for each of the local authorities within the Leicester and Leicestershire Housing Market Area.</p> <p>The outcomes of the Memorandum of Understanding and the Strategic Growth Plan will be justified by robust and up to date evidence base and Sustainability Appraisal work. All of the local authorities within the Leicester and Leicestershire</p>

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		housing levels being regarded as a maximum, subject to viability.	HMA are committed to working together.
16/12/16	GL Hearn On Behalf Of Severn Trent Water (Countesthorpe Road)	<p><b>HOUSING</b></p> <p>Vision STWL broadly welcome the Council’s Vision for the Borough to 2036 and supports the Local Plan objective for a balanced housing market, namely to:</p> <p><i>“To ensure adequate affordable housing and a sustainable blend of choices to meet local need. The focus of new housing will be in Oadby, Wigston and South Wigston centres to facilitate their regeneration.”</i></p> <p>Draft Policies The Preferred Options Local Plan consultation document sets out a series of draft policies for consideration.</p>	Comment noted. The Council welcomes this broad support.
16/12/16	GL Hearn On Behalf Of Severn Trent Water (Countesthorpe Road)	<p>Policy 4.2 ‘Spatial Strategy for Development in the Borough’ sets out the spatial strategy for the Borough. STWL broadly support the policy direction to “allocate sufficient land for the development of new dwellings over the Plan period up to 2036 to meet required need”, however the Council should look to deliver housing to meet need across the Borough including in rural areas.</p> <p>It is acknowledged that until the findings of the Leicestershire Housing and Economic Development Needs Assessment (HEDNA) are published it is not possible to set a specific housing land requirement informed</p>	Comment noted. The Council will be undertaking site assessment evidence base work to ensure that any land identified for residential development during the Local Plan period up to 2036 is sustainable, located in the most appropriate location, is viable and deliverable.

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		by an objectively assessed need.	
16/12/16	GL Hearn On Behalf Of Severn Trent Water (Countesthorpe Road)	Of particular relevance to these representations is Chapter 6 including draft policies 6.1 'Housing Choices', 6.2 ' <i>Housing Density</i> ' and 6.3 ' <i>Affordable Housing and Starter Homes</i> '. STWL have no formal comment to make on these policies at this stage but it reserves the right to provide a more detailed response following the publication of additional housing evidence.	Comment noted.
16/12/16	GL Hearn On Behalf Of Severn Trent Water (Countesthorpe Road)	<p>Policy 7.1 Housing Allocations confirms that in order to meet the Borough's housing target the Council will seek to allocate sites of 11 dwellings or more. STWL welcomes the acknowledgement that in order to ensure flexibility within the Plan the Council will look to allocate suitably located greenfield release sites.</p> <p>Housing Need Evidence The Council is currently working with all of the other Leicester and Leicestershire Housing Market Area (HMA) authorities to produce a HEDNA. When finalised and published the HEDNA will set out the full Objectively Assessed Need for both housing and employment, for each of the HMA authorities and the wider HMA area.</p> <p>Given that the HEDNA is still in preparation and the relevant further evidence base has yet to be undertaken, the Council has not committed to a Plan period target within the consultation document</p>	Comment noted.

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		The preferred options document does not allocate land for development, however it does set out the preferred approaches of the Council to delivering sustainable development. During the next stage of Local Plan consultation, Publication, the Council will allocate the necessary land to meet the Borough's identified Plan target, both for housing and employment.	
16/12/16	GL Hearn On Behalf Of Severn Trent Water (Countesthorpe Road)	In light of this, therefore, STWL have limited comments to make until the housing evidence base has been updated and presented in the Publication Local Plan.	Comments noted.
16/12/16	GL Hearn On Behalf Of Severn Trent Water (Countesthorpe Road)	<p>EMPLOYMENT LAND Vision</p> <p>STWL broadly welcome the Council's Vision for the Borough to 2036 and support the ambition to ensure that the area has a prosperous economy. STWL also supports the Local Plan objective for improved employment opportunities, namely to:</p> <p>"To provide for the development of employment land on a variety of sites to support a diversity of employment opportunities and to achieve a better balance between the location of jobs and housing, which will reduce the need to travel and promote sustainable growth up to the period 2036.</p> <p>New employment land will be provided in the</p>	Comment noted. The Council welcomes this support.

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		most appropriate locations including the Direction for Growth areas, to provide opportunities for fresh employment areas and accommodation to meet the needs of local businesses wishing to grow and those wishing to establish new businesses in the Borough. There will be better access to the road network also.”	
16/12/16	GL Hearn On Behalf Of Severn Trent Water (Countesthorpe Road)	Draft Policies The Preferred Options Local Plan consultation document sets out a series of draft policies for consideration.	Comment noted. The Council will look to work proactively with STW regarding ‘Oadby Sewage Treatment Works’ in the future as the Plan progresses.
16/12/16	GL Hearn On Behalf Of Severn Trent Water (Countesthorpe Road)	Policy 4.2 ‘Spatial Strategy for Development in the Borough’ sets out the spatial strategy for the Borough. STWL broadly support the policy direction, however acknowledge that until the findings of the Leicestershire Housing and Economic Development Needs Assessment (HEDNA) are published it is not possible to set a specific employment land requirement informed by an objectively assessed need.  Of particular relevance to these representations is draft policy 7.4 ‘Oadby Sewage Treatment Works’ which states:  <i>“Subject to implementation of proposals submitted by the landowner to discontinue the operation of the Oadby Sewerage Treatment Works over the course of the Plan period, the Council would consider employment-based redevelopment proposals</i>	Comment noted.

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		<p><i>(use classes B1, B2 or B8) for this site. Proposals should seek to create a sustainable, well designed and high quality scheme and the applicant would therefore be encouraged to engage with the Council at an early stage in order to develop detailed plans illustrating how the wider issues including accessibility, impacts upon the surrounding Green Wedge, and mitigation of potential contamination will be taken into account. All development proposals will need to give consideration to other relevant policies within this Local Plan.”</i></p> <p>STWL support the identification of the site for ‘employment-based redevelopment proposals’ in principle and are keen to work collaboratively with the Council to deliver a high quality employment scheme at the site. Further comment will be provided by STWL once additional employment evidence has been published.</p> <p>Employment Need Evidence  A key objective of the Preferred Option Local Plan is to improve employment opportunities in the Borough, this includes “<i>new employment land will be provided in the most appropriate locations including the Direction for Growth areas, to provide opportunities for fresh employment areas and accommodation to meet the needs of local businesses wishing to grow and those wishing to establish new businesses in the Borough</i>”.</p>	
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		<p>The Council is currently working with all of the other Leicester and Leicestershire Housing Market Area (HMA) authorities to produce a HEDNA. When finalised and published the HEDNA will set out the full Objectively Assessed Need for both housing and employment, for each of the HMA authorities and the wider HMA area.</p> <p>Given that the HEDNA is still in preparation and the relevant further evidence base has yet to be undertaken, the Council has not committed to a Plan period target within this consultation document</p> <p>This preferred options document does not allocate land for development, however it does set out the preferred approaches of the Council to delivering sustainable development. During the next stage of Local Plan consultation, Publication, the Council will allocate the necessary land to meet the Borough's identified Plan target, both for housing and employment.</p>	
16/12/16	GL Hearn On Behalf Of Severn Trent Water (Countesthorpe Road)	In light of this, therefore, STWL have limited comments to make until the employment evidence base has been updated and presented in the Publication Local Plan.	Comment noted.
16/12/16	Woodland Trust	<p><b>Policy 5.6</b></p> <p>In policy 5.6, we welcome the inclusion of woodland in your standard for the provision of natural greenspace in new development. We</p>	<p>The Council acknowledges and welcomes the support of the Woodlands Trust.</p> <p>The Council will ensure that the Pre-Submission Local Plan document contains wording reflecting the</p>

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		hope you will also include the need for street trees and other trees outside woodland as a component of the green infrastructure which is needed in new development. Trees and woods can provide extra benefits over and above those provided by other types of GI: for example sequestration of carbon to help tackle climate change, alleviation of certain types of flooding and provision of shade on hot days in the summer to make life more pleasant for local residents.	importance of street trees in urban environments.
16/12/16	Woodland Trust	The Woodland Trust would be happy to work with the Council, with local community groups or with private developers to help provide new woodland either in existing communities or as part of new development.	The Council is always keen to engage and work with key stakeholders.
16/12/16	Woodland Trust	<b>Policy 10.1</b>  In policy 10.1, we welcome the protection given to trees, woods and hedgerows. We also welcome the requirement for replacement in the case of loss but would ask you to bear in mind the point made above that ancient woodland is irreplaceable. We would like to see loss of ancient or veteran trees avoided wherever possible. When other mature trees outside woods have to be removed (eg street trees), we would like to see replacement planting on at least a two for one ratio, bearing in mind that it may take many decades for a newly planted sapling to give the same amenity or biodiversity value as a mature tree.	The Council acknowledges and welcomes the support of the Woodlands Trust.  The Council will seek to take account of the Woodlands Trust comments within Policy 10.1 in the Pre-Submission Local Plan document.
16/12/16	Woodland Trust	<b>Policy 10.2</b>	The Council will seek to take account of the Woodlands Trust comments within Policy 10.2 and

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		In policies 10.2 we welcome the recognition of the role that habitat creation can play in flood risk management. We would like to see mention in this policy and in policy 10.3 of the specific role which tree planting and woodland creation in appropriate locations can play in reducing the danger of both fluvial and surface water flooding. Research by the University of Manchester suggests that increasing tree cover in urban areas by 10% can reduce surface water run-off by almost 6%. Trees are therefore a useful component of Sustainable Urban Drainage Systems (SuDS).	10.3 in the Pre-Submission Local Plan document.
16/12/16	Woodland Trust	<p><b>Policy 10.4</b></p> <p>In policy 10.4, we welcome the reference to the need to protect ancient woodland and veteran trees. However, it is not clear from the wording whether these assets are regarded as designated or non-designated and the protection afforded to non-designated assets appears to be considerably weaker than for designated. Ancient woodland is an irreplaceable habitat and has been described as the cathedrals of nature, due to the vast range of species which are found there. We would therefore like the policy to state explicitly that ancient woodland and ancient/veteran trees will be protected from development in all but the most wholly exceptional circumstances.</p>	<p>Comment noted.</p> <p>Ancient Woodland and Ancient / Veteran trees will be protected from development in all but the most wholly exceptional circumstances. The new Local Plan will be amended to reflect this.</p>
16/12/16	Wigston Civic Society	<p>Issues raised;</p> <p>1) Housing figures/supporting evidence-emphasise that 95 units are high.</p>	Comments noted.

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		<p>2) Need for sensitive development at Kilby Bridge site.</p> <p>3) Encourage a mix of housing (starter homes, elderly, bungalows, affordable housing)</p> <p>4) Encourage landscaping schemes (soft landscaping)</p> <p>5) New development schemes should seek to improve/enhance the infrastructure provision of existing areas.</p> <p>6) No reduction in parking places (conformity to parking policy)</p> <p>7) Council adopt CIL</p> <p>8) Safe cycling/walking routes encouraged within any new development. Improve public transport in borough. (Council to adopt not private authorities)</p> <p>9) Design guide alongside existing Residential Development Guide</p> <p>10) Granville Road designated as a conservation area</p> <p>11) Emphasis placed upon green wedges, town centres &amp; conservation areas.</p> <p>12) Re-use of existing derelict buildings (commercial/residential uses)</p> <p>13) Awaiting approval of proposals submitted for Wigston, South Wigston &amp; Kilby Bridge.</p>	
16/12/16	CO-OP Estates	<p>Draft Policies</p> <p>Policy 4.2 (Spatial Strategy for Development in the Borough)</p> <p>3.1 Whilst the Co-Op broadly support the spatial strategy, it maintains a holding objection until</p>	Comment noted.

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		such time as the Leicester and Leicestershire Housing and Economic Needs Assessment (HEDNA) identifies the full, objectively assessed need (FOAN) for both market and affordable housing across the Housing Market Area.	
16/12/16	CO-OP Estates	3.3 The Direction for Growth site should be referred to throughout as the 'Wigston Direction for Growth' as it would only deliver housing to the south of the Borough. As part of the need to provide a balanced approach to delivering jobs and housing across the whole Borough, any Greenfield land release should include land in the north of the Borough, on sites relating to the existing urban area and in closer proximity to the Leicester Principal urban Area (PUA). This would also ensure a response to market demand in the more affluent parts of the Borough.	Comment noted.  The correction will be made throughout the document to refer to the Wigston Direction for Growth.
16/12/16	CO-OP Estates	Policy 5.6 (Open Space, Sport and Recreation Facilities)  4.2 Policy 5.6 should make specific reference to the suitability of land south of Gartree Road (up to 14Ha) which is within the Co-op's control, to help meet the long term cemetery/burial needs of Oadby and Wigston Borough Council as part of the wider planning strategy for the Stoughton Estate.	Comment noted. The Council will seek to take account of the Co-Op Estates comments within Policy 5.6 in the Pre-Submission Local Plan document.
16/12/16	CO-OP Estates	Policy 6.1 (Housing Choices)  5.1 The Co-op support the pragmatic	Comment noted. The Council welcomes the support of Co-Op Estates.

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		<p>approach outlined in Policy 6.1 in reference to the Council working with applicants to achieve solutions where viability presents policy standards being achieved. Moreover, the Co-op support policy references to specialist accommodation, where a need is evident, and appropriate dwelling sizes to ensure new homes offer quality accommodation for occupiers.</p>	
16/12/16	CO-OP Estates	<p>Policy 6.2 (Housing Density)</p> <p>6.1 As drafted Policy 6.2 risks being in conflict with the policy aspirations stated elsewhere in the DPOLP to achieve good design in all new developments. Whilst it is accepted that Paragraph 47 of the Framework allows Council's to set their own approach to housing densities to reflect local circumstances, it is unclear from the current evidence base why a prescriptive approach to housing densities is warranted in Oadby and Wigston.</p> <p>6.2 There is a risk that a prescriptive approach and minimum housing densities could stifle innovative design which responds to the context, location and setting of individual sites. In addition, such an approach may run counter to prevailing market conditions and buyer demand. A more flexible approach on density would ensure a better balance between design considerations, the commercial needs and aspirations of the development industry and the need to ensure that land is used</p>	<p>The Council will consider reducing the dwelling per hectare density outside of the Borough's town and district centres and existing urban areas. The Council suggests that the density outside of these areas could be 30 dwellings per hectare rather than 40. It is felt that this density would better reflect the aspirations of the NPPF regarding flexibility.</p>

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		efficiently and effectively.	
16/12/16	CO-OP Estates	<p>Policy 7.1 (Housing Allocations)</p> <p>7.2 Until such time as the FOAN for market and affordable housing is identified and sufficient sites allocated to meet that need, the Co-op is compelled mto maintain a holding objection to Policy 7.1.</p>	Comment noted.
16/12/16	CO-OP Estates	<p>7.3 In addition, the additional housing requirement to be met through the Local Plan should be cognisant of any unmet need from other authorities in the Housing Market Area.</p> <p>7.4 Since the Councils bid to quash the appeal Decision for Cottage Farm has recently failed at the Court of Appeal, therefore, it would now seem appropriate to consider the Cottage Farm site as a commitment rather than an allocation.</p> <p>7.5 The land west of Welford Road is understood to comprise a 2.9Ha site, lying between Thythorn Field Community Primary School and the A5199 (Welford Road). The 2012 SHLAA indicates the site lies within open countryside, isolated from the existing urban fringe.</p> <p>7.6 The 2012 SHLAAA notes that the site (west of Welford Road) is constrained by flood risk and is high in archaeological potential. The 2012 SHLAA concludes the site is not suitable or achievable, however, the 2016 SHLAA retains the site as a potential housing site (beyond the 10 year</p>	<p>Comments noted.</p> <p>Alongside the Strategic Growth Plan, under the Duty to Cooperate, the local authorities are working collectively to produce (and all sign up to) an agree a Memorandum of Understanding that illustrates the housing provision target for each of the local authorities within the Leicester and Leicestershire Housing Market Area.</p> <p>The outcomes of the Memorandum of Understanding and the Strategic Growth Plan will be justified by robust and up to date evidence base and Sustainability Appraisal work. All of the local authorities within the Leicester and Leicestershire HMA are committed to working together. The SA has been undertaken in line with the agreed SA framework and assumptions set out in Appendix 4 of the SA Report. Options have been assessed against the baseline and in line with the precautionary principle. SA is a strategic process and the PPG requires that all sites are considered in the same level of detail. As such, detailed ecological assessments for individual sites cannot be taken into account in the SA.</p> <p>In addition to SA, the Council is also assessing each</p>

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		<p>period, in the context of 5 year supply).</p> <p>7.7 It is also instructive to consider the Council’s Sustainability Assessment (SA) which sits alongside the DPOLP. Table 4.1 score the potential Greenfield allocations against 22 SA Objectives. The Gartree Road/Stoughton Road site is only assessed as having significant negative effect (with some acknowledged uncertainty) in respect of the historic environment (SA7), biodiversity/ geodiversity (SA8) and the redevelopment of brownfield land (SA18). The land west of Welford Road achieves the same score on these three objectives but is also assessed as having a significant negative effect in respect of two other objectives; landscape (SA9) and water quality and flooding (SA10).</p> <p>7.9 The technical information appended to these representations demonstrate that there are no significant ecological constraints to the Gartree Road/Stoughton Road site being redeveloped in a sensitive manner which respects the existing SBI at Stackyard Spinney and other ecological features on the site. In light of the supplementary information it may be appropriate to re-evaluate the potential effects of the site in the context of SA8.</p> <p>7.13 The Council should allocate land at Gartree Road/Stoughton Road for housing as part of a wider strategy for the Stoughton</p>	<p>site as part of an Extended Phase 1 Habitat Survey. That piece of work will also be taken into consideration as evidence to guide decision making as part of the emerging Local Plan.</p>
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		Estate.	
16/12/16	CO-OP Estates	<p>Policy 7.3 (Stoughton Grange)</p> <p>8.2 The site boundary shown at Appendix 2 of the DPOLP does not reflect the Co-op's aspirations for the site as part of the wider strategy for the Stoughton Estate. A more appropriate Site Boundary Plan is provided at Appendix 8 and it is requested that the entirety of this land be removed from the Green Wedge Designation.</p>	<p>Comments noted. The Council will be undertaking site assessment evidence base work to ensure that any land identified for residential development during the Local Plan period up to 2036 is sustainable, located in the most appropriate location, is viable and deliverable.</p>
16/12/16	CO-OP Estates	<p>Policy 7.5 (Wigston Direction for Growth)</p> <p>9.1 The Councils' reliance on Wigston Direction for Growth delivering a further 550 dwellings in addition to the 450 dwellings for which outline planning permission has been secured, risks a highly imbalanced approach to housing across the Borough as a whole. In addition, it is not apparent from the DPOLP (or the associated evidence base) precisely what land would be included within the Phase 2 or how many landowners are involved or affected. Multiple landowners would warrant co operation, commercial development agreements as part of any comprehensive scheme and/or numerous signatories to any Section 106 Agreement for example which can significantly delay on site delivery.</p>	<p>Comment noted.</p> <p>The Council will be undertaking site assessment evidence base work to ensure that any land identified for residential development during the Local Plan period up to 2036 is sustainable, located in the most appropriate location, is viable and deliverable.</p> <p>The Council will ensure that the Local Plan complies with policy and guidance set out nationally. The Council is aware that it would not be appropriate to 'put all of its eggs in one basket', therefore will allocate sufficient land to ensure choice and competition in the market.</p>
		<p>9.2 There is a conspicuous absence of any technical information to demonstrate that a development of this scale could be comprehensively achieved. This is a separate matter to the Sustainability Assessment undertaken by the Council, but</p>	<p>Comment noted.</p>

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		there must be confidence that the site is deliverable for the Plan to meet its objectives, have sufficient certainty and meet the tests of soundness.	
16/12/16	CO-OP Estates	<p>9.3 The Infrastructure requirements associated with delivering an urban extension of 1,000 dwellings plus 5Ha of employment land warrant further investigation at this stage for there to be certainty that Phase 2 is capable of providing such a significant element of the total housing need likely to materialise in the final plan. The Council must be satisfied that the delivery of Phase 2 would not warrant such significant highway or other infrastructure costs that might prejudice viability and hence delivery of the Phase 2 site. It is highly conceivable that an additional 550 dwellings to the 50 already granted outline permission would require significant upgrades to Welford Road, Newton lane or Kilby Bridge. Any potential upgrades may also necessitate the agreement of third party landowners or even compulsory purchase which will impact on timescales. The potential impact on social infrastructure must also be understood before the Council is content to rely on such an allocation.</p> <p>9.4 There is also uncertainty as to the ability of the market in south and east Wigston to absorb the quantum of housing which the Council is proposing to allocate in a single location. In the last 10 years the Council has averaged 86 net completions per annum</p>	<p>Comments noted. The Council will be undertaking site assessment evidence base work to ensure that any land identified for residential development during the Local Plan period up to 2036 is sustainable, located in the most appropriate location, is viable and deliverable.</p> <p>If further greenfield release sites are required to reflect the outcomes of the HEDNA the Council will identify these within the Pre-Submission Local Plan where appropriate to do so. The Council identified areas of potential greenfield release within the Preferred Options document, these were Land between Stoughton Road and Gartree Road, Oadby; Land at Cottage Farm, Oadby; and, Land west of Welford Road, Wigston.</p> <p>Any sites submitted through the Call for Sites process or which have been identified within the Council's SHLAA will be assessed during the production of the Pre-Submission Local Plan.</p>

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		<p>across the whole Borough. However, it anticipates 1,000 dwellings being delivered in a single location over the Plan period which does not seem to be consistent with the historic rate of delivery or spatial distribution. If the housing allocations were dispersed more widely across the Borough, it would help the needs of more households and market demand in Oadby.</p>	
16/12/16	CO-OP Estates	<p>Policy 10.6 (Green Wedges)</p> <p>10.3 The emerging Local Plan should be informed by a Green Wedge Review to understand the degree to which the existing Green Wedge boundary serves its objectives. In the context of these representations, the allocation of Gartree Road/Stoughton Road would not lead to a merging of settlements or an incongruous incursion into open countryside; it would limit development to within defensible boundaries formed by Gartree Road , Stoughton Road and the University Playing Fields and would not lead to merging or coalescence of settlements.</p>	<p>Comment noted. As part of the Pre-Submission Local Plan production, the Council will be undertaking a Green Wedge review to ensure that the evidence underpinning the Green Wedge policy is robust and up to date.</p>
16/12/16	CO-OP Estates	<p>Conclusions</p> <p>11.1 The starting point for consideration of the Councils Regulation 18 Draft Preferred Options Local Plan is the well established principle enshrined in Paragraph 158 of the Framework; Development Plans must be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.</p>	<p>Comments noted.</p>

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		<p>11.2 At this stage, a fundamental element of the emerging Local Plan is absent; the overarching housing and economic need which the Plan will seek to meet. It is understood that the HEDNA is due to be published in early 2017 and the findings therein will be subject to further consultation and stakeholder workshops.</p> <p>11.3 It can only be concluded that at this stage that the Local Plan, as currently drafted, would not meet the tests of soundness at paragraph 182 of the Framework. It is not positively prepared, justified or consistent with national policy.</p> <p>11.4 In promoting Gartree Road/Stoughton Grange site for residential purposes, the Stoughton Grange Centre for mixed used purposes and the land south of Gartree Road as a cemetery site, the Co-op are committed to working constructively with the Council to ensure and appropriate planning strategy is put in place for Stoughton Estate.</p> <p>11.5 The Co-op reserves the right to make further representations as the Plan progresses and would welcome the opportunity to be actively involved in the Local Plan Examination.</p>	
10/1/17	GVA	<p>Jelson Homes (Representations in relation to Newton Lane- Direction For Growth Area)</p> <p>As a consequence of carrying out</p>	Comments noted.

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		consultation in advance of the publication of the HEDNA, the Preferred Options document does not specify the Borough's FOAN for housing and employment development, or development targets for the forthcoming plan period. It also says nothing about the specific allocation of sites. It is evident that OWBC has, therefore, not been able to identify its 'preferred options' for future growth in the Borough. On this basis, we conclude that the publication of the Preferred Options document is premature.	
10/1/17	GVA	Without clarification of the FOAN for the Borough, we believe that it is unsound for OWBC to seek to establish a spatial strategy. The proposed strategy for accommodating growth must be directly related to the scale of need. To demonstrate this, we note that OWBC expects the DfG to provide 550 houses. That development would comprise 'Phase 2' of a DfG first identified in the adopted Core Strategy. Planning permission was granted in 2016 for 450 houses in the DfG area, which will comprise 'Phase 1' of that scheme. Consequently, it appears that OWBC expects the DfG to deliver 1,000 dwellings.	Comments noted.
10/1/17	GVA	However, in the absence of the finalised HEDNA and the identification of a housing requirement for the Borough, it is not possible to determine how much of the requirement for OWBC will be met on the DfG site. GVA has undertaken its own assessment of FOAN for the HMA, and this exercise has identified an FOAN for OWBC of at least 140 dwellings	Comments noted.

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		per annum (although this makes no specific provision for affordable housing and so the FOAN / final housing requirement should almost certainly be set at a considerably higher level than this). Applying that figure, the DfG would only deliver circa 7 years' supply of housing. Given that OWBC is proposing a plan period of 20 years, there would clearly remain a significant amount of housing to be delivered on other sites and it is unclear whether the spatial strategy proposed by OWBC would enable delivery of that housing.	
10/1/17	GVA	It also appears that there is an inconsistency between the proposed spatial strategy and the 11 general objectives of OWBC that are set out in Section 3 of the consultation document. Objective 7 promotes "growth of the Principal Urban Area" and states that it is the intention of OWBC to "establish a number of Direction for Growth areas adjacent to the Principal Urban Area to meet the Borough's housing allocation". The predication of the proposed spatial strategy on a single DfG is therefore in conflict with Objective 7. In our view, this only serves to emphasise the prematurity of the Preferred Options consultation exercise.	Comments noted.
10/1/17	GVA	In addition to housing need matters, the Preferred Options document also addresses itself to Green Wedges, and includes draft policies which seek to control development in such areas. The thrust of the proposed policies do not appear to materially differ from those in the saved Local Plan and Core	Comment noted. As part of the Pre-Submission Local Plan production, the Council will be undertaking a Green Wedge review to ensure that the evidence underpinning the Green Wedge policy is robust and up to date.

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		Strategy. However, the Preferred Options document indicates that OWBC is relying on evidence base reports produced in 2004 and 2005 to support its emerging Green Wedge policies. This is wholly inappropriate. The Borough's Green Wedges should be reviewed effectively from scratch, in the light of current policy objectives and development requirements. In particular, the Council should review what planning purpose its Green Wedges are designed to achieve and whether it is necessary to retain them in whole or only in part for these key objectives to be satisfied. The review of Green Wedges must take account of the need to identify opportunities for new development in the most sustainable locations.	
10/1/17	GVA	OWBC must revisit its Preferred Options once the HEDNA has been published, its conclusions in respect of FOAN have been considered and a housing requirement for the Borough has been determined. In the interests of undertaking a robust approach to plan-making, we conclude that OWBC must establish its housing target and identify its preferred sites for meeting it. Those sites should be subject to a further 'Preferred Options' consultation exercise. Only then, once comments on the preferred option sites have been received, should OWBC proceed to prepare the 'Publication' version of the New Local Plan.	Comment noted.
10/1/17	Environment Agency	<u>Flood Risk</u> The Local Plan – Preferred Options	Comment noted. The Council will ensure that the Pre-Submission Local

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		<p>Consultation Document (LP – POCD) should be strengthened by making clearer how the location of future development in the Borough will need to take into account both existing flood risk and also projected future flood risk, caused as a result of climate change.</p>	<p>Plan makes reference/takes account of both existing flooding and projected flooding when allocating land within the Borough for future development.</p>
		<p>A flooding sequential approach (through application of the Sequential Test, in line with the National Planning Policy Framework) will need to be taken at all stages of the Plan process in order to ensure that development is appropriate, safe for its lifetime from flooding and does not increase flood risk elsewhere.</p> <p>The specific sections which could be strengthened are as follows:</p>	<p>Comment noted.</p>
10/1/17	Environment Agency	<p><u>Addressing Key Issues and Challenges and Maximizing Opportunities by 2036</u> (p22).</p> <p>One of the existing bullet points on page 22 could be extended as follows:</p> <ul style="list-style-type: none"> <li>• Ensure that development is sustainable in terms of location, use and form, including ensuring that development is neither at flood risk nor increases flood risk to other areas. (This amendment could also be made to bullet point 6 on p25).</li> </ul>	<p>The Council will amend both bullets referred to by the Environment Agency. The bullets will be amended to take account of the wording submitted.</p>
10/1/17	Environment Agency	<p><u>Chapter 3- Vision &amp; Objectives</u></p> <p>Under the section “Safe, clean and attractive...” mention should be made of all new development being sustainable by being</p>	<p>The Council will amend the wording of the Vision and Objectives to reference flooding and the focussing of development within areas of lowest flood risk.</p> <p>The Council acknowledges and welcomes the support</p>

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		<p>located at the areas of lowest flood risk through application of the flooding Sequential Test.</p> <p>Notwithstanding the above, we are pleased to see that Objective 9 (p28) includes “reduce flood risk”.</p>	<p>of Environment Agency.</p>
<p>10/1/17</p>	<p>Environment Agency</p>	<p><u>Policy 10.2</u> (p114).</p> <p>The following bullet point could be extended to read:</p> <ul style="list-style-type: none"> <li>• Appropriate land at lower risk is not available and this has been evidenced through the application of the NPPF Sequential Test.</li> </ul> <p>The above bullet point is the most important from a hierarchical point of view of the four bullet points given at the bottom of page 114 and therefore it may be appropriate to list it first (rather than third, as currently given). The suggested amendment to the bullet point as given above may also negate the need for the first bullet point, “There are national policies or other material considerations...”</p> <p>The Policy should include the need for a NPPF compliant Flood Risk Assessment for new developments in Flood Zones 2 and 3, and not just for those developments greater than 1 hectare. Because of this the first bullet point under the ‘necessary mitigation and adaptation measures’ could be expanded upon to include:</p>	<p>The Council will amend the bullet referred to by the Environment Agency. The bullet will be amended to take account of the wording submitted. Consideration will also be given to amendment / removal of bullet point one to reflect this comment.</p> <p>Comment noted. The wording of this section of Policy 10.2 will be amended to reflect those referred to by the Environment Agency.</p>

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		<ul style="list-style-type: none"> <li>• Aim to avoid or reduce the risk of flooding and harm from it by: ensuring the sequential approach has been taken and that the development is safe for the life time of the development and will not increase flood risk to others, including, but not being restricted to ensuring there is safe means of access and egress to and from the site and floodplain compensation.</li> </ul>	
10/1/17	Environment Agency	<p><u>Biodiversity Habitat</u></p> <p><u>Addressing Key Issues and Challenges and Maximizing Opportunities by 2036 (p22).</u></p> <p>We suggest there is more of an emphasis on habitat creation for protected and priority species in this section.</p> <p>Regarding the last bullet point, the negative effects on the natural environment as a result of development should be avoided in the first instance. The mitigation hierarchy should be applied i.e. avoid, mitigate and as a last resort compensate for any negative effects.</p>	<p>Comment noted.</p> <p>Comment noted. The last bullet will be amended to reflect this suggestion by the Environment Agency.</p>
10/1/17	Environment Agency	<p><u>Objective 2 (p26) and Objective 9 (p28)</u></p> <p>We support both these objectives but suggest Objectives 2 or 9 include a paragraph which promotes habitat creation to improve species resilience to climate change.</p>	<p>Comment noted. Objective 2 will be amended to reflect this suggestion by the Environment Agency.</p>
10/1/17	Environment Agency	<p><u>Chapter 4- Sustainable Places</u></p>	<p>Comment noted. The Council will look to incorporate this suggestion either within the supporting text of a</p>

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		With regard to paragraph 4.5 and development in general within the district, we would expect watercourses and their riparian habitats to be included within any developments green infrastructure allocation. We would also expect land adjacent to any watercourse to be free of built development and formal landscaping. Ideally a policy would be included within the plan which states this.	relevant policy or the policy itself.
10/1/17	Environment Agency	<u>5.5 Green Infrastructure</u> We support the wording of this section but as discussed above watercourses and their riparian habitats should be incorporated into a sites green infrastructure plan.	Comment noted.
10/1/17	Environment Agency	<u>7.2 Kilby Bridge Village Envelope</u> We have no issues with this section except to point out that major developments should ensure that any watercourse or waterbody is incorporated in to the sites green infrastructure and should be free of built development and formal landscaping.	Comment noted.
10/1/17	Environment Agency	<u>Chapter 10- Protected Places</u> <u>Para 10.1- Biodiversity &amp; Geodiversity</u> Paragraph 10.1 seems to suggest that mitigation for negative impacts to biodiversity is acceptable in the first instance. We advise that this paragraph is reworded to state in the first instance that any negative impacts to protected and priority habitats and species	Comment noted. The wording of this paragraph will be amended to reflect this suggestion by the Environment Agency.

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		<p>should be avoided. Comments on mitigation and compensation should then follow with compensation for habitat loss only being considered as an absolute last resort.</p>	
10/1/17	Environment Agency	<p><u>Water Resource Issues</u></p> <p>We are happy to see the encouragement of water efficiency and conservation as part of policy 10.2 regarding climate change. However, it would be an improvement to see the acknowledgment for the Borough to stay within capacity of available water resources. We would like to give further details on this issues as follows:</p> <p>Severn Trent Water's (STW's) Water Resource Management Plan (WRMP), published in 2014, shows that in the East Midlands water resource zone there is a strong likelihood that STW can meet the demand for water over the next 25 years. However, there is a chance that the balance of water supply could move into a 10% deficit by 2018 (shown in figure 4.3 of the WRMP). Water is not freely available in the STW's East Midlands water resource zone and therefore the Local Planning Authority will need to be sure that there are resources available to supply extra demand incurred with new development. Developments must include details of the source of water requirements. The Soar Abstraction Licensing Strategies (previously called CAMS) details how much water is available for abstraction across Oadby and Wigston. In</p>	<p>Comment noted. The Council will seek to engage with Severn Trent Water when preparing the Borough's emerging Infrastructure Delivery Plan and this will also be taken into consideration as part of the Pre Submission draft of the New Local Plan.</p>

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		<p>the event of drought, water companies such as STW are responsible for producing a drought plan which is reviewed every 5 years. Their current plan was produced in 2014. Drought Plans set out how water resources and supply will be managed in dry years</p>	
10/1/17	Environment Agency	<p><u>Water Efficiency</u></p> <p>The Environment Agency would request that any new homes must continue to meet the mandatory national standard set out in the Building Regulations of 125 litres/person/day (l/p/d). Where there is a clear local need, councils can set out local plan policies requiring that new dwellings meet the tighter Building Regulations optional requirement of 110 l/p/d (as set out in the Planning Practice Guidance). We are happy to see this included within the report in paragraph 5.17 and policy 5.3.</p> <p>Retrofitting is about improving or adapting existing homes to be more efficient. Councils may be able to implement retrofitting schemes for their own properties such as social homes, council offices or schools. Retrofitting could reduce consumption by 14%. This can involve no or low technology, such as a cistern displacement device, simple flow aerator tap insets or low flow showerheads.</p> <p>For non-residential buildings the developers should also demonstrate that they have considered water efficiency and conservation</p>	<p>Comments noted. The Council will look to engage with Severn Trent Water and key stakeholders to ensure that the policy approach in this Borough is both appropriate and sustainable.</p>

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		<p>in the design and maintenance of the buildings. Where standards currently exist for a particular building type, the developers should aim for BREAM Very Good or Excellent standards and we would request that maximum points are scored on water.</p> <p>Alternatively AECB Water Standards (2009) uses a fixtures and fittings approach to setting performance requirements for individual devices, rather than a whole-building target. Local councils requiring non-households to achieve 'best practice' AECB standards will reduce water demands.</p>	
10/1/17	Environment Agency	<p><u>Water Quality Issues</u></p> <p>We also wish to highlight the following issues around water quality that may be impacted by growth and house building in Oadby and Wigston.</p> <p>We acknowledge the inclusion of water quality as part of the criteria of objective 10.3 regarding SuDs and Policy 7.2 regarding Kilby Bridge and Policy 7.3 regarding Stoughton Grange.</p>	Comment noted.
10/1/17	Environment Agency	<p><u>The Water Framework Directive</u></p> <p>However, the report doesn't seem to reference the Water Framework Directive (WFD) in general or in specific terms of the council's catchment. The report doesn't reference sewerage infrastructure apart from the potential decommissioning redevelopment of Oadby Sewage Treatment</p>	<p>Comment noted.</p> <p>The Council will seek to engage with Severn Trent Water when preparing the Borough's emerging Infrastructure Delivery Plan. This will also be taken into consideration as part of the Pre-Submission draft of the New Local Plan.</p> <p>The Council will also ensure that it has taken account</p>

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		<p>Works in Policy 7.4.</p> <p>The report should include reference to the WFD and a discussion of the pressures/ issues within the council boundary. We suggest that that one of the reports objectives or policies should be:</p> <p>“Water Framework Directive (WFD). The WFD has a ‘no deterioration’ requirement. This means that no environmental harm should result from the planned catchment developments.”</p> <p>WFD could be included as part of the last bullet point of Addressing Key Issues and Challenges and Maximising Opportunities by 2036 on p22.</p> <p>There should also be mention in the document that development should occur where appropriate sewerage infrastructure is in place by the water company to effectively transfer and treat any increase in waste water. Growth should not cause a deterioration in water quality and WFD status.</p> <p>The increased amount of waste water and sewage effluent produced by the new developments will need to be dealt with to ensure that there is no detriment in the quality of the water courses receiving this extra volume of treated effluent. As such there may be a requirement for the expansion and upgrading of current sewage treatment systems, if the volume of sewage requiring</p>	<p>of the Water Framework Directive and its relationship to the Humber River Basin Management Plans, as referenced by the Environment Agency.</p>
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		<p>treatment within the borough increases. Appropriate infrastructure should be in place by the water company to effectively transfer and treat any increase in waste water.</p> <p>Infrastructure should consider sewage collection networks including Combined Sewer Overflows, overflows from pumping stations, pumping station capacities and sewage treatment works capacity in terms of the permitted volumes and quality limits. Development will need to link into the water companies 5 year Asset Management Plans (AMP) to ensure appropriate investment is planned and delivered.</p> <p>Finally, the Water Framework Directives Humber River Basin Management Plans, updated in 2015, require that the water courses within the borough continue to show improvements in overall quality in line with the quality standards specified in these documents. Development locations will need to consider the Water Framework Directive. The WFD has a 'no deterioration' requirement which, in this case, effectively means no environmental harm should result from the planned catchment developments.</p>	
17/11/2016	Forestry Commission	<p><b>Local Plans and ancient woodland – Forestry Commission approach</b></p> <p>The Forestry Commission is not in a position to input into the consultation process for Local Plans. However, the information below is provided to assist you in assessing the</p>	<p>The Council appreciates the comments of the Forestry Commission. The Council will endeavour to take account of the information submitted by the Forestry Commission in the preparation of the Pre-Submission</p>

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	<p>appropriateness of sites for future development, and to highlight opportunities for achieving your renewable energy obligations.</p> <p><b>A summary of Government policy on ancient woodland</b>  <u>Natural Environment and Rural Communities Act 2006</u> (published October 2006).  <b>Section 40</b> – “Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”.</p> <p><u>National Planning Policy Framework</u> (published March 2012).  <b>Paragraph 118</b> – “planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss”.</p> <p><u>National Planning Practice Guidance – Natural Environment Guidance</u>. (Published March 2014)  This Guidance supports the implementation and interpretation of the National Planning Policy Framework. This section outlines the Forestry Commission’s role as a <b>non-statutory consultee</b> on <i>“development proposals that contain or are likely to affect</i></p>	<p>Local Plan document.</p>
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		<p><i>Ancient Semi-Natural woodlands or Plantations on Ancient Woodlands Sites (PAWS) (as defined and recorded in <u>Natural England's Ancient Woodland inventory</u>), including proposals where any part of the development site is within 500 metres of an ancient semi-natural woodland or ancient replanted woodland, and where the development would involve erecting new buildings, or extending the footprint of existing buildings”</i></p> <p>It notes that <b>ancient woodland is an irreplaceable habitat</b>, and that, in planning decisions, <b>Plantations on Ancient Woodland Sites (PAWS) should be treated equally in terms of the protection afforded to ancient woodland in the National Planning Policy Framework</b>. It highlights the Ancient Woodland Inventory as a way to find out if a woodland is ancient.</p> <p><u>Standing Advice for Ancient Woodland and Veteran Trees</u>. (Published April 2014) The Forestry Commission has prepared joint <u>standing advice</u> with Natural England on ancient woodland and veteran trees which we refer you to in the first instance. This advice is a material consideration for planning decisions across England. It explains the definition of ancient woodland, its importance, ways to identify it and the policies that relevant to it. It also provides advice on how to protect ancient woodland when dealing with planning applications that may affect</p>	
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		<p>ancient woodland. It also considers ancient wood-pasture and veteran trees.</p> <p>The Standing Advice website will provide you with links to <u>Natural England's Ancient Woodland Inventory assessment guides</u> and other tools to assist you in assessing potential impacts. The assessment guides sets out a series of questions to help planners assess the impact of the proposed development on the ancient woodland. <b>Case Decisions</b> demonstrates how certain previous planning decisions have taken planning policy into account when considering the impact of proposed developments on ancient woodland. These documents can be found on our <u>website</u>.</p> <p><u>The UK Forestry Standard</u> (3rd edition published November 2011).  <b>Page 24</b> "Areas of woodland are material considerations in the planning process and may be protected in local authority Area Plans. These plans pay particular attention to woods listed on the Ancient Woodland Inventory and areas identified as Sites of Local Nature Conservation Importance (SLNCIs)."</p> <p><u>Keepers of Time</u> – A Statement of Policy for England's Ancient and Native Woodland (published June 2005).  <b>Page 10</b> "The existing area of ancient woodland should be maintained and there should be a net increase in the area of native</p>	
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		<p>woodland”.</p> <p><u>Natural Environment White Paper “The Natural Choice”</u> (published June 2011)  <b>Paragraph 2.53</b> - This has a “renewed commitment to conserving and restoring ancient woodlands”.</p> <p><b>Paragraph 2.56</b> – “The Government is committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland sites”.</p> <p><u>Biodiversity 2020: a strategy for England’s wildlife and ecosystem services</u> (published August 2011).  <b>Paragraph 2.16</b> - Further commitments to protect ancient woodland and to continue restoration of Plantations on Ancient Woodland Sites (PAWS).</p> <p>Renewable &amp; low carbon energy  The resilience of existing and new woodland is a key theme of the Forestry Commission’s work to Protect, Improve and Expand woodland in England we will continue to work with Forestry / Woodland owners, agents, contractors and other Stakeholders to highlight and identify, pests and diseases and to work in partnership to enable Woodlands and Forests are resilient to the impacts of Climate Change.  Woodfuel and timber supplies continues to be an opportunity for local market growth whilst also enabling woodlands to be brought back into active management.</p>	
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		<p>Flood risk The planting of new riparian and floodplain woodland, can help to reduce diffuse pollution, protect river morphology, moderate stream temperature and aid flood risk management, as well as meet Biodiversity Action Plan targets for the restoration and expansion of wet woodland.</p> <p>The Forestry Commission is keen to work in partnership with Woodland / Forest Stakeholders to develop opportunities for woodland creation to deliver these objectives highlighted above.</p> <p>In the wider planning context the Forestry Commission encourages local authorities to consider <u>the role of trees in delivering planning objectives as part</u> of a wider integrated landscape approach. For instance through:</p> <ul style="list-style-type: none"><li>• the inclusion of <u>green infrastructure</u> (including <u>trees and woodland</u>) in and around new development; and</li><li>• the use of locally sourced wood in construction and as a sustainable, <u>carbon lean fuel</u>.</li></ul>	
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