

OADBY AND WIGSTON BOROUGH COUNCIL

LOCAL PLAN

Statement of Consultation

January 2018



Introduction

1. Purpose of this Document

- 1.1 This Statement of Consultation has been published in support of Oadby and Wigston Borough Council's (the Council) Local Plan Submission document (January 2018). It sets out how the Borough Council has undertaken community consultation and stakeholder engagement throughout the preparation of the Council's Local Plan (January 2018). It identifies the consultation stages undertaken and outlines who was consulted and how they were consulted. This document also provides a summary of the main issues raised and explains how these issues have been addressed and how they have informed the preparation of the Local Plan.

2. Why is this Document needed?

- 2.1 Paragraph 155 of the of the National Planning Policy Framework sets out the Government's principles for community engagement;

'early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision, and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made'.

- 2.2 Regulation 17 of The Town and Country Planning (Local Planning) (England) Regulations 2017, requires Local Planning Authorities to produce;

'(d) a statement setting out –

- i. which bodies and persons were invited to make representations under regulation 18,*
- ii. how those bodies and persons were invited to make such representations,*
- iii. a summary of the main issues raised by those representations,*
- iv. how those main issues have been addressed in the Local Plan'.*

- 2.3 Regulation 22 of The Town and Country Planning (Local Planning) (England) Regulations 2017, requires Local Planning Authorities to produce;

'(c) a statement setting out –

- i. which bodies and persons the local planning authority invited to make representations under regulation 18,*
- ii. how those bodies and persons were invited to make representations under regulation 18,*

- iii. *a summary of the main issues raised by the representations made pursuant to regulation 18,*
- iv. *how any representations made pursuant to regulation 18 have been taken into account,*
- v. *if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations, and*
- vi. *if no representations were made in regulation 20, that no such representations were made'.*

3. Relationship with the Statement of Community Involvement

- 3.1 This Statement of Consultation also illustrates how the Borough Council has met the requirements of its Statement of Community Involvement (SCI) which was updated in 2014. The SCI sets out the Borough Council's approach to involving and consulting local people and stakeholders in the planning process, more specifically the preparation of the various components of the Local Plan and in making development management decisions on planning applications.
- 3.2 The Borough Council has exceeded these requirements, to ensure wide and inclusive consultations that reflect local circumstances, the character and composition of the local community, and, the resources available. The Council employed a variety of consultation methods to seek comment from groups who have traditionally found it difficult to engage in the planning process.

4. Duty to Co-operate

- 4.1 The Localism Act 2011 places a duty on Local Planning Authorities and other bodies to co-operate with each other to address strategic issues relevant to their areas. The duty requires ongoing constructive engagement on the preparation of Development Plan Documents and other activities in relation to the sustainable development and use of land.
- 4.2 The Council is required to cooperate with; neighbouring local authorities; county councils; and the following (statutory) organisations:
 - The Environment Agency
 - Historic England
 - Natural England
 - The Homes and Communities Agency
 - Clinical Commissioning Groups.
 - The Office of Rail Regulation
 - Highways England
 - Local highway authorities
 - The Leicester and Leicestershire Enterprise Partnership

- The Leicestershire Local Nature Partnership

4.3 Partnership working has been a key element in the preparation of the Local Plan. The Council has collaborated and co-operated with many public bodies, stakeholders and organisations throughout the preparation of its Local Plan. The duty also requires ongoing constructive engagement on the preparation of Development Plan Documents and other activities in relation to the sustainable development and use of land. A separate published document titled The Duty to Co-operate Statement should be read in conjunction with this Statement of Consultation.

5.0 Consultation Stages

5.1 The Council recognises the importance of engaging the community and stakeholders from the outset of the Local Plan preparation process. A number of consultation and engagement exercises have been carried out and this section of the Statement of Consultation sets out the consultation arrangements that have been carried out by the Council in the preparation of its Local Plan.

5.2 The table below shows the previous key consultation stages that have been involved in the preparation of the Local Plan, prior to submission of the Local Plan to the Planning Inspectorate.

Stage in Local Plan	Date
1. Local Plan Consultation – Key Challenges	12 th October 2015 to 23 rd November 2015
2. Local Plan Consultation – Preferred Options	4 th November 2016 to 16 th December 2016
3. Local Plan Consultation – Pre-Submission	6 th November 2017 to 18 th December 2017

Table 1

5.3 This Statement of Consultation considers each of the stages in the above table. It outlines who the Borough Council consulted and how these consultations were undertaken. It also summarises the main issues raised in the consultation responses and how they have been addressed and/or informed the preparation of the Local plan. This statement is supported by a comprehensive set of appendices highlighting the comments received at each stage of consultation, as well as the Council's response to comments received.

Key Challenges – Local Plan Consultation

Consultation Dates: 12th October 2015 to 23rd November 2015

5.4 In accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2017, prior to commencement of the Local Plan, an initial consultation on the scope and broad content of the Local Plan was carried out

by the Council. It provided an opportunity to seek the views, at an early stage in the process of a wide range of interested parties and stakeholders, to inform the Council's preparation of the Local Plan.

5.5 In addition to providing useful background information on the role of the Local Plan and its preparation process, the consultation focused on the Council's initial thoughts on the key issues that the Plan should address. Consultation documentation suggested possible content for the Local Plan and stakeholders were invited to express whether these were supported and/or whether there were any issues that were missing or should be excluded. The Council asked local people, businesses, organisations and statutory consultees to comment. Key issues covered in the consultation documentation included:

- The current position of the Council / Borough.
- Where new development should be located.
- How many homes need to build in the Borough and where.
- What types of housing should be provided in the Borough, including affordable housing.
- How should existing and new employment needs be met in the Borough.
- How can the Plan increase walking, cycling and the use of public transport.
- What type of development is needed in the Centres of Oadby, Wigston and South Wigston and what needs to be protected and enhanced.
- How can the Local Plan encourage high quality design of new development and what are the main characteristics of the Borough that new development should take account of.
- Which areas of green and open space within the Borough should be protected and why.
- How can the Local Plan protect the Borough from Climate Change.
- How can the Local Plan promote the use of energy efficient and sustainable construction.

Who was invited at this stage and how

5.6 Different methods of public consultation were used to maximise community and stakeholder engagement in the process. These included:

- a) All organisations and individuals, including statutory consultation bodies and general consultation bodies, such as interest groups, developers and agents and other interested parties, on the Council's Local Plan consultation database, were contacted by letter or email to inform consultees of the consultation. The letter / email explained:
- The purpose of the consultation.
 - How to find further information.
 - The consultation period.

- How to make representations.
 - The Council's specific consultation events – times / dates / locations
- b) Copies of a leaflet informing the public of the consultation and the times, dates and locations of the specific consultation events were made available at:

- Oadby and Wigston Borough Council Customer Services Centre, Wigston.
- Oadby Library.
- Wigston Library.
- South Wigston Library.

This information was also displayed on the Council's digital advertising signs situated on The Parade, Oadby and Bell Street, Wigston. Static exhibition boards with further information were also located at the Council's Customer Service Centre.

- c) A press release was issued advising of the Key Challenges consultation, what it was about and how people could have their say. It also informed of the Council's attendance at the specific consultation events. This information was also provided in 'Letterbox' which is a Council produced newsletter that is distributed to every household and business in the borough.
- d) Paper reference copies of the consultation documentation was made available throughout the period of the consultation, to view at:
- Oadby and Wigston Borough Council Customer Services Centre, Wigston.
 - Oadby Library.
 - Wigston Library.
 - South Wigston Library.
- e) The Local Plan webpage on the Council's website provided information on the consultation including consultation dates and where further information could be sought as well as a copy of the consultation documentation.
- f) Planning Officers attended the specific consultation events during the consultation period, to raise awareness of the consultation, explain the purpose of the consultation and to answer attendees' questions. The table below (Table 2) shows where and when these events took place

Venue	Date
Customer Service Centre, Bell Street, Wigston	21 st October 2015
Blaby Road Park Pavilion, Blaby Road, South Wigston	22 nd October 2015
Oadby Library, The Parade, Oadby	23 rd October 2015
Blaby Road Park Pavilion, Blaby Road South Wigston	27 th October 2015
Oadby Library, The Parade, Oadby	28 th October 2015
Customer Service Centre, Bell Street, Wigston	30 th October 2015

Table 2

- g) On the completion of the consultation a further press release was issued and an update included in Letterbox.

What were the main issues raised by the respondents

5.7 A total of 22 respondents submitted representations relating to the Key Challenges consultation. The respondents comprised of the development industry, planning consultants, public bodies, statutory organisations, local bodies and action groups and the general public.

5.8 The key topics that stakeholders commented on were:

- Cross boundary issues and the relationship with the adjacent local authorities.
- Health and well being of the community, including access to sport and recreational facilities.
- Built infrastructure delivery, including community facilities.
- Housing mix; to include provision for the elderly, affordable housing and provision of land for self build.
- Provision for the traveller community.
- Heritage and conservation, including preservation of conservation areas.
- The impact of new development on the farming community.
- Sustainable options for transport, including improved rights of way and provision of cycle lanes.
- Employment land requirements and attracting new businesses to the borough.
- The number of new homes needed within the Borough and their location.
- Town and District centre improvements.
- Climate change, renewable energy and low carbon techniques.
- Environmental policies including ecology and diversity, open space, green wedges, greening the borough and Flood Risk assessments.

5.9 A summary of the representations and the Council's responses are attached in Appendix C.

How were identified issues addressed

5.10 The representations informed the content and policies of the Preferred Options Local Plan. The content and policies were set out in seven topic / theme chapters, which are shown below.

- Sustainable Places
- Healthy Communities
- Housing Delivery
- Allocations and Regeneration Opportunities Areas
- Economic Prosperity
- Town Centre Development
- Protected Places

The topic areas were set out in separate chapters of the Preferred Options Local Plan and focused on, not only addressing the representations received in the previous round of consultation, but also delivering sustainable development in the right locations, whilst conforming to national policy and guidance.

Preferred Options – Local Plan Consultation

Consultation Dates: 4th November 2016 to 16th December 2016

5.11 On 1st November 2016 the Council agreed the Preferred Options Local Plan for consultation, to commence on the 4th November 2016.

5.12 The consultation provided an opportunity for local residents, community groups, developers, public bodies, statutory consultees and other key stakeholders to have an input and comment on the contents of the Preferred Options document. The consultation document identified the Council's preferred policy approach for delivering sustainable development in the borough throughout the Plan period and took account of the key issues and challenges raised in the previous consultation.

Who was invited at this stage and how

5.13 Different methods of public consultation were used to maximise community and stakeholder engagement in the process. These included:

a) All organisations and individuals, including statutory consultation bodies and general consultation bodies such as interest groups, developers and agents and other interested parties, on the Council's Local Plan consultation database, were contacted by letter or email to inform consultees of the consultation. The letter / email explained:

- The purpose of the consultation.

- How to find further information.
 - The consultation period.
 - How to make representations.
 - The Council's specific consultation events – times / dates / locations
- b) Copies of a leaflet informing the public of the consultation and the times, dates and locations of the specific consultation events were made available at:
- Oadby and Wigston Borough Council Customer Services Centre, Wigston.
 - Oadby Library.
 - Wigston Library.
 - South Wigston Library.
- This information was also displayed on the Council's digital advertising signs situated on The Parade, Oadby and Bell Street, Wigston. Static exhibition boards with further information were also located at the Council's Customer Service Centre.
- c) A press release was issued advising of the Preferred Options Local Plan consultation, what it was about and how people could have their say. It also informed of the Council's attendance at the specific consultation events. This information was also provided in 'Letterbox' which is a Council produced newsletter that is distributed to every household and business in the borough.
- d) Paper reference copies of the consultation documentation was made available throughout the period of the consultation, to view at:
- Oadby and Wigston Borough Council Customer Services Centre, Wigston.
 - Oadby Library.
 - Wigston Library.
 - South Wigston Library.
- e) The Local Plan webpage on the Council's website provided information on the consultation, including consultation dates and where further information could be sought, as well as a copy of the consultation documentation.
- f) Planning Officers attended the specific consultation events during the consultation period, to raise awareness of the consultation, explain the purpose of the consultation and to answer attendees' questions. The events took place at the following Venues:

Venue	Date
Oadby Trinity Methodist Church, Harborough Road, Oadby	2 nd November 2016
Fairfield Community Primary School, Cheshire Drive, South Wigston	8 th November 2016
Tesco, Blaby Road, South Wigston	10 th November 2016
Wigston Library, Bull Head Street, Wigston	14 th November 2016
Wigston Pool, Station Road, Wigston	15 th November 2016
Council Offices, Station Road, Wigston	16 th November 2016
Parklands Leisure Centre, Washbrook Lane, Oadby	22 nd November 2016
Oadby Farmers Market, The Parade, Oadby	25 th November 2016
Wigston Farmers Market, Bell Street, Wigston	2 nd December 2016
Council Offices, Station Road, Wigston	8 th December 2016

Table 3

- g) On the completion of the consultation a further press release was issued and an update included in Letterbox.

What were the main issues raised by the respondents

5.14 A total of 42 respondents submitted representations relating to the Preferred Options consultation. The respondents comprised of the development industry, planning consultants, public bodies, statutory organisations, local bodies and action groups and the general public.

5.15 The key topics that stakeholders identified were:

- The wording of the Local Plan should better reflect national policy and guidance, particularly in relation to affordable housing, heritage assets and conservation.
- It was suggested that the wording relating to Green Infrastructure could be strengthened to further protect important Green Infrastructure Assets.
- Sport England suggested that standards should not be used in relation to calculating the provision of outdoor sports space, and that the Playing Pitch Strategy should set out the Borough's provision requirements for this.
- Natural England highlighted the value of the Kilby Bridge area, particularly the Kilby – Foxton Canal SSSI.
- The lack of a definitive housing target for the Plan period was highlighted.
- Alternative development sites, to the options set out within the Plan were promoted by land owners / agents.
- The relevance of the Green Wedge designation within the Borough was commented upon.
- The promotion of sustainable transport modes, including cycling and walking.
- Housing allocations within the Town and District centres.

- The lack of flexibility relating to new development housing density.
- The Duty to Cooperate, the relationship of the Local Plan and the Leicester and Leicestershire Strategic Growth Plan.
- The spatial strategy, land supply and the reliance on a single Direction for Growth Area.
- The proposed Countryside policy within the Plan being a 'blanket' protection policy.
- The importance of the Canal and its towpaths and the contribution they make to health and wellbeing.
- Small scale development opportunities within the Kilby Bridge Settlement area.
- Ensuring the data and information used within the spatial portrait of the Plan is up to date.
- Delivery of the appropriate amount of employment land within the Borough.
- The positive impact of street trees.
- Flood Risk and the sequential test, and the importance of the Water Framework Directive.

5.16 A summary of these responses to the consultation was prepared and is attached at Appendix B.

How were the identified issues addressed

5.17 A summary of the key changes made to the Local Plan, that were due to representations received at the Preferred Options stage, in preparation for the Local Plan Pre-Submission version are illustrated below.

5.18

- The wording of the Local Plan Spatial Portrait was amended to better reflect the wording expressed within the NPPF and the NPPG, as well as up to date data and information, relating to demographics, housing and the economy.
- The wording of the Vision and Spatial Objectives was strengthened to better reflect the Council's amended Corporate Priorities, the Local Plans Vision, as well as policy and guidance set at the national level. The Vision and Spatial Objectives were also strengthened in relation to accessibility and improved public transport links between each of the settlements in the Borough.
- The Council made use of the most up to date housing and employment information illustrated within the Leicester and Leicestershire Housing and Economic Development Needs Assessment (HEDNA). The Council based the Local Plans plan period housing and employment targets on the housing and employment Objectively Assessed Needs identified within the HEDNA.

- Locally based evidence set out within the Employment Land and Premises Study also informed the employment Plan targets illustrated within the Plan. Allocations were proposed within the Local Plan Pre-Submission document comprising both housing and employment.
- A number of Local Green Spaces submitted to the Council by local community groups were assessed against national policy and guidance and were illustrated / defined on the Pre-Submission Local Plan Adopted Policies Map.
- In collaboration with Sport England the policy and guidance relating to open space and sport provision was amended to reflect the relevance of the Playing Pitch Strategy in relation to the provision of outdoor sports within the Borough.
- Due to evidence identifying an OAN for housing of 148 additional homes per annum, and the need to provide a wide variety and choice of homes, the Council proposed to allocate three Direction for Growth Areas, and not just a single growth area, as illustrated within the Preferred Options Local Plan consultation. The three Direction for Growth Areas proposed for allocation were consistent with the greenfield release options set out within the Preferred Options Local Plan Consultation.
- Site specific policies were illustrated for all of the larger scale allocations, both for employment and housing.
- Wording of the Pre-Submission Local Plan was amended where necessary and relevant to better reflect the policy and guidance expressed within the NPPF and the NPPG, in particular relating to affordable housing (and its definition) and heritage assets and conservation.
- A definitive boundary for the Kilby Bridge Settlement Envelope was proposed through the Pre-Submission Local and key objectives were set out for development within the boundary. These included small scale mixed use development, comprising of up to 40 additional homes over the Plan period.
- Due to the availability of evidence and under the Duty to Cooperate, the Local Plans plan period was defined as 2011 to 2031.
- Policies relating to Green Infrastructure, Open Spaces and Biodiversity and Geodiversity were strengthened to preserve, conserve and enhance and seek net gains from new development.
- In addition to the Stoughton Grange Direction for Growth Area, the Local Plan Pre-Submission document proposed a cemetery allocation in the north of Oadby, within the designated green wedge.

- Smaller scale development opportunities, (site size of between 11 and 100 additional dwellings) were identified and allocated within Local Plan policy.
- A more flexible approach to housing density on sites of 0.3 hectares and more was proposed. An additional 'tier' was proposed, that related to development opportunities that were located outside of the Leicester Principal Urban area. The relevant policy proposed an approach setting out 50dph, 40dph and 30dph, depending on the location of development.
- A 'trigger' was set out within the Local Plan Pre-Submission document that illustrated the steps that the Council will take in relation to monitoring of targets, and evidence of unmet need within the Leicester and Leicestershire Housing Market Area (HMA). The wording of which was agreed between all local authorities within the HMA.
- Proposed amendments were made to both of the green wedge designations within the Borough, evidenced by the Council's Green Wedge Review.

Pre-Submission – Local Plan Consultation

Consultation Dates: 6th November 2017 to 18th December 2017

- 5.19 On 31st October 2017 the Council agreed the Pre-Submission Local Plan for consultation to commence in November 2017.
- 5.20 The consultation document provided an opportunity for local residents, community groups, developers, public bodies, statutory consultees and other key stakeholders to have an input and comment on the contents of the Pre-Submission Local Plan. The Plan sets out the Council's policy approach for delivering sustainable development in the Borough for the period 2011 to 2031 and takes account of the key issues and challenges raised in the previous consultations.

Who was invited at this stage and how

- 5.21 Different methods of public consultation were used to maximise community and stakeholder engagement in the process. These included:
- a) All organisations and individuals, including statutory consultation bodies and general consultation bodies such as interest groups, developers and agents and other interested parties, on the Council's Local Plan consultation database, were contacted by letter or email to inform consultees of the consultation. The letter / email explained:
- The purpose of the consultation.

- How to find further information.
 - The consultation period.
 - How to make representations.
 - The Council's specific consultation events – times / dates / locations
- b) Copies of a leaflet informing the public of the were made available at:
- Oadby and Wigston Borough Council Customer Services Centre, Wigston.
 - Oadby Library.
 - Wigston Library.
 - South Wigston Library.
- This information was also displayed on the Council's digital advertising signs situated on The Parade, Oadby and Bell Street, Wigston.
- c) A press release was issued advising of the Pre-Submission Local Plan consultation, what it was about and how people could have their say. This information was also provided in 'Letterbox' which is a Council produced newsletter that is distributed to every household and business in the borough.
- d) Paper reference copies of the consultation documentation was made available throughout the period of the consultation, to view at:
- Oadby and Wigston Council Customer Service Centre, Bell Street, Wigston.
 - Brocks Hill Country Park.
 - Oadby Library.
 - Wigston Library.
 - South Wigston Library.
- e) The Local Plan webpage on the Council's website provided information on the consultation, as well as a copy of the consultation documentation.

What were the main issues raised by the respondees

5.22 A total of 40 respondees submitted representations relating to Pre-Submission consultation. The respondees comprised of the development industry, planning consultants, public bodies, statutory organisations, local bodies and action groups and the general public.

5.23 The key topics that stakeholders identified were:

- The Local Plan's plan period should extend from 2011 to 2036, rather than the period 2011 to 2031 as proposed within the Plan.

- The Objectively Assessed Need for housing illustrated within the HEDNA was not robust.
- Further sites should be allocated within the Borough for additional housing, in addition to the Plan period target of 2,960.
- The housing 'buffer' identified within the Plan should be allocated.
- The proposed extension to the Oadby and Wigston Green Wedge is not justified.
- The Direction for Growth Areas proposed for allocation are not the most sustainable sites.
- Self Build and Custom Build provision should not be required by policy.
- Greater flexibility should be afforded relating to density of developments of 0.3 hectares and above.
- The Local Plan 'trigger' mechanism should be embedded in policy.
- The Countryside policy proposed within the Plan should allow for additional types of development to those specified.

5.24 A summary of these responses to the consultation was prepared and is attached at Annex A.

Appendix A

Representations received during the Pre-Submission Local Plan Consultation November to December 2017 (with Officer responses)

Consultation response received (date)	Representation received from	Comment raised	Response given by Council Officers
02.11.17	Kevin South (local resident)	<p>Granville Road should be in the Borough Plan – and policies to protect the road.</p> <p>Granville Road is a extremely unique Road in the Borough of Oadby and Wigston as part of the borough Plan and planning, that “planning and a strategy” be put in place to encourage the Council to have new policies to protect and encourage the Protection of this hedge and tree lined Lane - founded by the Leicester and Leicestershire Freehold land Society.</p> <p>The Borough of Oadby and Wigston does not have any other road like this in Character and Granville Road Is unique in Character in County.</p> <p>Not any other Street in the Borough has unique challenges to protect the Road/ lane and the habitats and trees that line the Road/ Lane.</p> <p>Granville Rd has a unique History from 1855.</p> <p>The Borough Council should protect and recognise the Uniqueness of the road and the landscape of the road and value to the borough with Planning polices and a strategy for Granville Road.</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The Council recognises the uniqueness of Granville Road and the valuable contribution it makes to the Borough’s landscape.</p> <p>The significance of Granville Road is expressed within the Council’s Landscape Character Assessment as well as policy guidance to protect it from unsuitable development in the future.</p> <p>Local Plan Policy 44 Landscape and Character seeks to protect existing quality and character areas within the Borough and states that development proposals will only be permitted should they be in keeping with the area in which they are situated. The policy also states that development proposals that are contrary to the policy guidance set out within the Council’s Landscape Character Assessment...will not be approved.</p> <p>Taking account of the above, the Council is of the opinion that there is sufficient policy protection for Granville Road.</p>
02.11.17	Trevor Mildred (local resident)	Mr Kevin South has passed on a copy of your letter regarding the Planning Policy Consultation process. As a result, I would ask that the council consider giving	Comment noted. No proposed change to the Local Plan document for the reasoning set out below.

		<p>Granville Road the status of a significant street. This is because Granville Road is a unique street within the borough due to its history and character and should be recognised as such.</p>	<p>The Council does not award 'significant street' status and is unaware of such status in other local authority areas.</p> <p>The Council however recognises the uniqueness of Granville Road and the valuable contribution it makes to the Borough's landscape.</p> <p>The significance of Granville Road is expressed within the Council's Landscape Character Assessment as well as policy guidance to protect it from unsuitable development in the future.</p> <p>Local Plan Policy 44 Landscape and Character seeks to protect existing quality and character areas within the Borough and states that development proposals will only be permitted should they be in keeping with the area in which they are situated. The policy also states that development proposals that are contrary to the policy guidance set out within the Council's Landscape Character Assessment...will not be approved.</p> <p>Taking account of the above, the Council is of the opinion that there is sufficient policy protection for Granville Road.</p>
06.11.17	Amec Foster Wheeler	<p>National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf.</p> <p>We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.</p>	<p>Comment noted.</p> <p>The Council will continue to consult with National Grid on any future plans or strategies.</p>
06.11.17	Severn Trent	<p>Thank you for the opportunity to comment on your consultation.</p> <p>We currently have no specific comments to make, but please keep us informed when your plans are further</p>	<p>Comment noted.</p> <p>The Council will continue to consult with Severn Trent on any future plans or strategies.</p>

		developed when we will be able to offer more detailed comments and advice.	
07.11.17	Trevor Mildred (local resident)	Mr Kevin South has passed on a copy of your letter regarding the Planning Policy Consultation process. As a result, I would ask that the council consider giving Granville Road the status of a significant street. This is because Granville Road is a unique street within the borough due to its history and character and should be recognised as such.	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The Council does not award 'significant street' status and is unaware of such status in other local authority areas.</p> <p>The Council however recognises the uniqueness of Granville Road and the valuable contribution it makes to the Borough's landscape.</p> <p>The significance of Granville Road is expressed within the Council's Landscape Character Assessment as well as policy guidance to protect it from unsuitable development in the future.</p> <p>Local Plan Policy 44 Landscape and Character seeks to protect existing quality and character areas within the Borough and states that development proposals will only be permitted should they be in keeping with the area in which they are situated. The policy also states that development proposals that are contrary to the policy guidance set out within the Council's Landscape Character Assessment...will not be approved.</p> <p>Taking account of the above, the Council is of the opinion that there is sufficient policy protection for Granville Road.</p>
08.11.17	National Farmers Union (NFU)	<p>Thank you for consulting me about the latest stage of the local plan. The NFU's comments are set out below:-</p> <p>Page 114, paragraph 10.1.1. We support the principle of the paragraph but are concerned that the requirement to consult other stakeholders in the final sentence of the paragraph is not open-ended. It would</p>	<p>Comment noted. Although the NFU comment states 'not' open ended, the way in which the following sentence of the comment is worded, the Council assumes that the 'not' should not be included in the NFU's comment.</p> <p>The Council is proposing minor modifications to the</p>

		be easy to stymie development by adding consultees to the list that would come back with ever more requirements that needed to be satisfied before permission could be granted.	<p>Local Plan from the comments received from the NFU for the reasoning set out below.</p> <p>The Council is proposing to amend the final sentence of paragraph 10.1.1 to –</p> <p><i>'If a development proposal has a less significant impact that can be mitigated through appropriate mitigation measures, for example habitat re-creation, the proposal will not be refused from the outset and discussion will take place between the applicant, the Council, the County Council and other external stakeholders, for example the Woodland Trust, the Environment Agency and Natural England.'</i></p> <p>The Council would not want to stymie development by adding consultees to an open ended, ever increasing list, therefore is proposing to specify the specific consultees in the supporting text at paragraph 10.1.1.</p>
08.11.17	National Farmers Union (NFU)	Page 114, paragraph 10.1.5. The Woodland Trust is an estimable organisation but does it have the quasi statutory role that the Council is implying in this paragraph?	<p>Comment noted. The Council is proposing minor modifications to the Local Plan from the comments received from the NFU for the reasoning set out below.</p> <p>The Council is proposing to amend the final sentence of paragraph 10.1.5 to –</p> <p><i>'Any development proposals that require mitigation will be required to submit the mitigation proposals to the Council and get them approved by the Council and in collaboration with the Woodland Trust.'</i></p> <p>The Council would not want to imply that the Woodland Trust is quasi-statutory, however would want its importance and value as an expert informative organisation / charity in relation to veteran trees or ancient woodland to remain.</p>
08.11.17	National Farmers	Page 117, paragraph 10.2.9. Tree, woodland and	Comment noted. The Council is proposing minor

	Union (NFU)	habitat planting in the wrong place can exacerbate flooding so the plan needs to have something like "... will be sought in appropriate places as they can" in the penultimate line of this paragraph.	<p>modifications to the Local Plan from the comments received from the NFU for the reasoning set out below.</p> <p>The Council is proposing to amend the final sentence of paragraph 10.2.9 to –</p> <p><i>'The creation of new habitats, the planting of appropriate trees, and the creation of new woodland in appropriate places will be sought as they can help reduce the danger of both fluvial and surface water flooding.'</i></p> <p>The Council agrees that tree, woodland and / or habitat planting in the wrong place can exacerbate flooding.</p>
08.11.17	National Farmers Union (NFU)	Page 127, policy 42. Green wedges are not green belt and we would be looking to see that more farm diversification is allowed for in them than the list currently in this policy. For example small farm shops should be fine to be allowed in green wedges. Otherwise the policy is too restrictive towards rural business development.	<p>The Council is not of the opinion that Policy 42 Green Wedges should be amended. The purpose of the Green Wedges situated within the Borough is to protect important areas of open land which influence development form and have a positive effect on people's health and well being. The policy allows for appropriate uses, of which retail development is not one.</p> <p>Green Wedge designations within the Borough have been in place since at least 1999, with related planning policies only allowing for appropriate uses. Of the two Green Wedge areas within the Borough, the Council is not aware of any current need or want for rural retail business development.</p>
08.11.17	National Farmers Union (NFU)	Page 130, policy 44. All development will have an impact on the landscape but what the Council is trying to prevent, surely, is an adverse impact, so in the last sentence of this policy it should be "Development proposals that have a potential significant adverse impact on" Otherwise most development could fall at this hurdle, surely.	<p>Comment noted. The Council is proposing minor modifications to the Local Plan from the comments received from the NFU for the reasoning set out below.</p> <p>The Council agrees that only development having an adverse impact should be managed appropriately, therefore is proposing the following wording for the final paragraph in Policy 44 Landscape and Character.</p>

			<i>'Development proposals that have a potential adverse impact on nationally designated areas or features of landscape and cultural significance will not be permitted.'</i>
10.11.17	Mr Wilson (local resident)	One final observation, that I will clarify before the deadline, is that the one and only road that connects Oadby and Wigston is, at best, a crawl in busy times that will only be made worse by further developments. Build a new connecting road to cater for new housing.	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The Council is aware of the congestion at some of the junctions within the Borough, as well as its routes. However, the Council is also aware of the need to provide new homes and employment opportunities for its communities. Through the preparation of the Local Plan, the Council has sought to provide the required number of homes and the right amount of employment opportunities for its communities.</p> <p>As part of the evidence base for the Local Plan, the Council jointly commissioned the South East Leicestershire Transport Study with Harborough District Council, Leicester City Council and Leicestershire County Council, that assessed the likely impact of proposed planned growth within the Borough (as well as Harborough District) area up to 2031. The study concluded that, although there would be increased traffic levels on the surrounding roads and junctions of each growth area identified, each of the growth areas has the potential to accommodate growth without having a significant detrimental impact on the wider highway network. However, certain levels of mitigation will be needed.</p>
14.11.17	Kevin South (local resident)	<p>Granville Rd needs to be in Borough Plan</p> <p>I wish to comment further about the Borough Plan Consultation</p> <p>Granville Road that dates back to 163 years with its lost in time feel of land mark trees and hedges that's today</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The Council recognises the uniqueness of Granville Road and the valuable contribution it makes to the Borough's landscape.</p>

		<p>really out of place – compared to the other streets in the borough.</p> <p>Country lane feel in a large town.</p> <p>The hedges and trees are important contribution to the borough and should be considered to be a Asset. Granville Rd possibly has more trees and hedges than any other Road in Borough and should be in borough plan in</p> <ol style="list-style-type: none"> 1. Culture and Historic Environment Assets 2. Landscape and Character. <p>Granville Road possible is a habitat for many species of animals with it hedges (like a country lane without any public paths) and many properties are regarded as Significant today (possibly more than any other Road / Street)</p> <p>From Historical Asset the Lane was founded by Leicestershire and Leicester freehold Land Society and famous Leicester mayor John Briggs was involved – the plan was for a much bigger project almost a new village – Lane was separated into 14 plots for “Settlers or people” who had shares in the Society</p> <p>Recently Granville Road has lost huge length of original field hedging and the lane is threatened with advance form of “Street Greying.” Council should encourage Residents to look after the lane- adapt planning policy towards protecting this important lane in the borough.</p> <p>Granville Rd is an important asset to the borough and is in similar league to the Wigston Frame workers Cottage.</p>	<p>The significance of Granville Road is expressed within the Council’s Landscape Character Assessment as well as policy guidance to protect it from unsuitable development in the future.</p> <p>Local Plan Policy 44 Landscape and Character seeks to protect existing quality and character areas within the Borough and states that development proposals will only be permitted should they be in keeping with the area in which they are situated. The policy also states that development proposals that are contrary to the policy guidance set out within the Council’s Landscape Character Assessment...will not be approved.</p> <p>Taking account of the above, the Council is of the opinion that there is sufficient policy protection for Granville Road.</p>
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		The Borough Council need to adapt planning policy as part of Borough Plan towards Granville Rd.	
16.12.17	Mr Wilson (local resident)	<p>Traffic congestion is not primarily a problem, but rather the solution to our basic mobility problem, which is that too many people want to move at the same times each day. Why? Because efficient operation of both the economy and school systems requires that people work, go to school, and even run errands during about the same hours so they can interact with each other. The same problem exists in every major conurbation area in the world.</p> <p>There is but one link road between Wigston and Oadby, and there is but one link road between Wigston and South Wigston. At peak times, as above, traffic density is very, very high. Static traffic, increased pollution and high frustration levels. I accept that people need somewhere to live but the plans shown are unsustainable, put peoples health at risk from pollution and add to ever increasing congestion. Infrastructure improvements in roads is the only solution. People will not use public transport due to cost and convenience. The car is the only way to get to work and for the school run, all of which occur at the same time each day. The solution is simple, increase the roads between Oadby, Wigston and South Wigston. Then build houses.</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The South East Leicestershire Transport Study undertaken as evidence base for the Local Plan highlights the severity of the congestion within the Borough, specifically along its routes as well as at its junctions.</p> <p>The Council is aware of the limitations of the existing highway network and has sought to locate development within locations that have the least detrimental impact. The Council has also allocated three Direction for Growth areas throughout the Borough that seek development of a level that can contribute towards highway and transport mitigation (via financial contribution).</p> <p>The levels of growth proposed within the Local Plan are considered deliverable by the transport study, albeit a level of mitigation is required up to 2031.</p> <p>Post 2031, the Leicester and Leicestershire Strategic Growth Plan is proposing large scale highway and transport infrastructure that should relieve the pressures on the transport and highway network within the Leicester Principal Urban Area, particularly Leicester City and the Borough of Oadby and Wigston.</p>
24.11.17	Landmark Planning	Policy 45 of the Pre Submission Local Plan makes provision for a number of sites to be designated as Local Green Spaces (LGS). It is clear that in order for a site to be designated as a LGS, it should satisfy the criteria set out in paragraph 77 of the National Planning Policy Framework. Where such designation applies, planning permission will not be permitted for a	<p>Comment noted.</p> <p>As illustrated within the Local Green Space Assessment the Council was of the opinion that the community has demonstrated that SW3 meets the three criteria as set out in the NPPF (below).</p>

		<p>development proposal that results in the loss of the area unless the benefits of the development outweigh its loss. In the case of the proposed LGS at Saffron Road (SW3), the area of land lies within a commercial rather than residential area and accordingly, its proximity to the local community is questioned. Furthermore, it is hard to see how the existing area is demonstrably special to the local community or what significance it holds. The land at Saffron Road that includes area SW3 was originally Ministry of Defence Land. It was purchased in 1998 by my clients, Draper Commercial (part of Draper Property) and over time, new buildings have been built and the land developed to form the attractive commercial area that exists today. Draper Property need to retain the flexibility to alter the layout of the Tigers Road site as tenants' needs change. This includes the ability to be able to use the area that the Council intend to designate as LGS. Any future development of this land would, of course, be the subject of a planning application and such development proposals would include appropriate boundary treatment and landscaping. This would ensure that any redevelopment proposals retained the attractive appearance of the site without the need for the imposition of a restrictive LGS designation.</p>	<p><i>'- Where the green space is in reasonable close proximity to the community it serves;</i></p> <ul style="list-style-type: none"> <i>- Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its;</i> <ul style="list-style-type: none"> <i>- beauty;</i> <i>- historic significance;</i> <i>- recreational value (including as a playing field);</i> <i>- tranquillity;</i> <i>- or richness of its wildlife;</i> <i>- Where the green area concerned is local in character and is not an extensive tract of land.'</i> <p>However, the Council would not want to hinder the appropriate expansion or extension of an existing identified employment area and / or business should there be a need to do so in the future. The Council is mindful of the important role that local businesses play within the communities in which they are situated and the contribution they make to the local economy.</p> <p>The Local Green Space Policy as proposed within the Local Plan allows a level of flexibility, by suggesting that if the harm of losing the asset is significantly outweighed by the benefits of proposed development, then planning permission could be granted.</p>
24.11.17	Landmark Planning	<p>Policy 45 of the Pre Submission Local Plan makes provision for a number of sites to be designated as Local Green Spaces (LGS). It is clear that in order for a site to be designated as a LGS, it should satisfy the criteria set out in paragraph 77 of the National Planning Policy Framework. Where such designation applies, planning permission will not be permitted for a development proposal that results in the loss of the area unless the benefits of the development outweigh</p>	<p>Comment noted.</p> <p>As illustrated within the Local Green Space Assessment the Council was of the opinion that the community has demonstrated that SW6 meets the three criteria as set out in the NPPF (below).</p> <p><i>'- Where the green space is in reasonable close proximity to the community it serves;</i></p>

		<p>its loss. In the case of the proposed LGS at Tigers Road (SW6), the area of land lies within a commercial rather than residential area and accordingly, its proximity to the local community is questioned. Furthermore, it is hard to see how the existing area is demonstrably special to the local community or what significance it holds. The land at Tigers Way that includes area SW6 was purchased in 2002 from the Secretary of State by my clients, Draper Commercial (part of Draper Property) and over time, new buildings have been built and the land developed to form the attractive commercial area that exists today. Draper Property need to retain the flexibility to alter the layout of the Tigers Road site as tenants' needs change. This includes the ability to be able to use the area that the Council intend to designate as LGS. Any future development of this land would, of course, be the subject of a planning application and such development proposals would include appropriate boundary treatment and landscaping. This would ensure that any redevelopment proposals retained the attractive appearance of the site without the need for the imposition of a restrictive LGS designation.</p>	<p>- <i>Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its;</i></p> <ul style="list-style-type: none"> - <i>beauty;</i> - <i>historic significance;</i> - <i>recreational value (including as a playing field);</i> - <i>tranquillity;</i> - <i>or richness of its wildlife;</i> <p>- <i>Where the green area concerned is local in character and is not an extensive tract of land.'</i></p> <p>However, the Council would not want to hinder the appropriate expansion or extension of an existing identified employment area and / or business should there be a need to do so in the future. The Council is mindful of the important role that local businesses play within the communities in which they are situated and the contribution they make to the local economy.</p> <p>The Local Green Space Policy as proposed within the Local Plan allows a level of flexibility, by suggesting that if the harm of losing the asset is significantly outweighed by the benefits of proposed development, then planning permission could be granted.</p>
04.12.17	Office of Rail and Road (ORR)	<p>The Office of Rail and Road (ORR) has perused the documents and comments as follows:</p> <p>We having looked at the Oadby & Wigston Local Plan Pre-submission consultation document, Sustainable Transport and Initiatives pages 96 -98. From a level crossing safety perspective, we have no comments to make at this stage. However, should developments cause increased public usage of any specific level crossing, we would expect the Council to engage with Network Rail, in particular their local level crossing</p>	<p>Comment noted.</p> <p>The Council will continue to consult with ORR and Network Rail on any future plans or strategies.</p>

		manager, so that the risk assessment for the specific crossing may be reviewed and options to improve or maintain the level of risk control may be considered.	
06.12.17	Mr Kotak (local landowner)	<p>Thank you for your letter dated on 8th November 2017. I have a few concerns that I would like to bring to your attention with regards to the proposal of Local Green Space on 1 Ladysmith Road, LE18 4UZ.</p> <ol style="list-style-type: none"> 1. How has this proposal come about? 2. Why has this proposal come about? 3. How would this affect the future valuation of my land/property for future sale? 4. Who has proposed this plan? 5. How exactly would this benefit me? 6. How exactly would this benefit the local residents? 7. How many other gardens in the area have been proposed for Local Green Space? <p>My concerns are based on my personal circumstances going forward, but also, there has been an active planning application that has recently been appealed... a further planning application is also being proposed, how would this be affected?</p> <p>Based on the information provided to me via post on 8th November 2017, I would like to state that I politely OBJECT to the proposal of MY land being used as Local Green Space.</p>	<p>Comment noted.</p> <p>Upon the receipt of Mr Kotak's questions, the Council responded to Mr Kotak with the following.</p> <p><i>'Thank you for getting in touch with the Council regarding the proposed Local Green Space designation at Ladysmith Road, South Wigston (SW10). I will endeavour to answer all of your questions below.</i></p> <p><u><i>How has the proposal come about and, why has the proposal come about?</i></u></p> <p><i>National government in its planning policy document, the National Planning Policy Framework (https://www.gov.uk/government/publications/national-planning-policy-framework--2), sets out the national planning policy relating to Local Green Spaces. The document in paragraph 76, states that –</i></p> <p><i>'76. Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.'</i></p>

			<p><i>As the Council is currently producing its New Local Plan, land areas for Local Green Space designation can be identified. Through the production of the New Local Plan, local community groups proposed a number of areas of land for Local Green Space designation and submitted them to the Council. Within each of the site submissions received, the local community group set out why the land area was special to them and the value that the area held within the community. Once the Council had received the submissions, the proposed sites were assessed against nationally set criteria. The criteria is set out within the National Planning Policy Framework at paragraph 77. I have set out the criteria for you below.</i></p> <p><i>'77. The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:</i></p> <ul style="list-style-type: none"> <i>• where the green space is in reasonably close proximity to the community it serves;</i> <i>• where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</i> <i>• where the green area concerned is local in character and is not an extensive tract of land.'</i> <p><i>The proposed sites that met the nationally set criteria were then put forward for Local Green Space designation as part of the New Local Plan. As part of the process the Council contacted all of the landowners of the proposed sites, for comment.</i></p> <p><i>It should be noted that further information regarding Local Green Spaces can be found in the national governments National Planning Practice Guidance on the following link -</i></p>
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			<p>https://www.gov.uk/government/collections/planning-practice-guidance.</p> <p><u>How would this affect the future valuation of my land / property for future sale?</u></p> <p><i>It is not a question that can be answered by the Council as it is unknown whether or not it would affect the value of land.</i></p> <p><u>Who has proposed this Plan?</u></p> <p><i>The Council is producing the New Local Plan, which the Local Green Space designation forms part of, however the Council did not initially propose sites for Local Green Space designation; sites were submitted by local community groups. The Council assessed the proposed sites against the nationally set criteria.</i></p> <p><u>How exactly would this benefit me and how exactly would this benefit the local residents?</u></p> <p><i>The Local Green Space designation is a way that the local community can protect areas of green space that are of particular importance to them.</i></p> <p><i>It should be noted though, that the Local Green Space designation would not normally be appropriate on land that has planning permission for development. The Council would also not encourage the use of Local Green Space designations on private residential garden land.</i></p> <p><u>How many other gardens in the area have been proposed for Local Green Space?</u></p> <p><i>As far as the Council is aware, none of the Local Green</i></p>
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			<p><i>Space designations being proposed within the Council's New Local Plan are areas of private residential garden land.</i></p> <p><i>In addition to the above, I would like to reiterate, that the Council would not encourage the use of Local Green Space designations on private residential garden land or land that has extant planning permission for development. If the land in question (SW10), is private residential garden land or it has extant planning permission for development please could you inform us. The more information that you submit to the Council regarding the site, the more informed we can be.</i></p> <p><i>If you have any further questions, please do not hesitate to get in contact.'</i></p> <p>The Council would like to reiterate that the Local Green Space designation would not normally be appropriate on land that has planning permission for development. The Council would also not encourage the use of Local Green Space designations on private residential garden land.</p> <p>The Council has received no further evidence to suggest that the land in question (proposed for Local Green Space designation) has extant planning permission or is a residential garden.</p> <p>Taking account of the above, the Council considers that the land comprising SW10 conforms to national policy and guidance regarding Local Green Space designation.</p>
10.12.17	Mr D Lucas	<p>Parking and the constant disaster of Paddock St parking, traffic turning into Long Street causing even more chaos in Town Centre.</p> <p>As converting the Bull Head Street half to 2 way traffic</p>	<p>Comment noted.</p> <p>Through the Local Plan, the Town Centres Area Action Plan (Area Action Plan Guidance) and specific Local Development Orders, the Council considers that it has</p>

		<p>was approved at my last meeting as a County Councillor, why oh why is that matter ignored.</p> <p>The proposal to split up Paddock Street car park may be pretty on a plan BUT one can drive around looking for a space & usually get one.</p> <p>BUT if car parking is split up traffic will be popping up all over the place MORE CHAOS.</p> <p>“Major” traffic plans are needed already but housing proposal will cause dramatic build ups. Are developer contributions going to junction improvements.</p>	<p>the appropriate tools to provide development within the town centre of Wigston, enhances the built form, the public car parking arrangements as well as the highway and transport infrastructure.</p>
10.12.17	Highcroft Householders Association	<p>Thanks for sending me details of the Local Plan. I am delighted that Highcroft Park has been proposed as a Local Green Space and it is interesting to read about the wider plans across the borough.</p> <p>I wonder if I could pass on one specific point in relation to the proposals for Highcroft Park. On the map showing the park as a Local Green Space the shaded area does not seem to include the two access paths to the park from Park Crescent and Glen Way. This may seem like a small point, but it is important to us that these two paths also come under the same designation. Is it possible on the plan that these paths can also be shaded the same colour?</p>	<p>Comment of support noted.</p> <p>The Council would not object to the two pathways into the park being designated within the Local Green Space designation (O1).</p>
11.12.17	Natural England	<p>Natural England has already provided detailed comments on previous iterations of the emerging local plan. We have nothing further to add here. Our interests relate purely to any potential impact of the local plan on the natural environment, with a particular emphasis on avoiding 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). With that in</p>	<p>Comment of support noted.</p> <p>Local Plan Policy 17 Kilby Bridge Settlement Envelope sets out the Council’s approach to the Kilby Bridge area. The policy sets out a number of key objectives, including conserving and enhancing the Grand Union Canal conservation area as well as the Kilby-Foxton SSSI.</p>

		mind, 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. We broadly welcome Chapter 10 on protected places including the section on biodiversity and geodiversity. We are pleased to note that any development proposals that have a significant negative impact on important areas or result in significant habitat loss within the Borough will not be permitted for development.	
11.12.17	Natural England	We note and welcome the completion of a Sustainability Appraisal (SA) for the pre-submission version of the Oadby and Wigston Local Plan. Natural England concurs with the report's conclusion that the Local Plan includes a wide range of development management policies, aiming to protect and enhance the economic, social and environmental conditions of the Borough. These should go a long way towards mitigating the potential negative effects of the overall scale of development proposed. We welcome the commitment to give further consideration to potential mitigation measures as well as the approach to monitoring the likely significant effects of the plan following this pre-submission consultation.	Comment noted.
11.12.17	Natural England	Natural England welcomes the Habitats Regulations Assessment (HRA) for the Oadby and Wigston Local Plan and considers that the scope of the report, its methodology and conclusions meet the requirements of the Habitats Directive and associated guidance. We note the conclusion that the potential for the Oadby and Wigston Local Plan to have likely significant effects on European sites in combination with the Local Plan for Rutland County cannot yet be ruled out, due to the early stage of the Rutland Local Plan and the lack of solid HRA conclusions. We welcome the commitment to	Comment noted.

		revisit the issue during forthcoming stages of the HRA for the Rutland Local Plan. Any further iterations of the HRA for the Oadby and Wigston Local Plan should consider new evidence relating to the Rutland Local Plan as this becomes available.	
13.12.17	Gladman (Kodiak Land)	<p>Policy 20- Wigston Direction for Growth Area</p> <p>Kodiak supports the allocation of further land for an additional 600 dwellings at the Wigston Direction for Growth area for "phase 2" development. Kodiak considers the Direction for Growth Area to be the most sustainable location in the district for new development, as a result of its proximity to the town centre and public transport links into Leicester City. Kodiak also recognises the need to provide infrastructure to serve the extension to the town. This infrastructure will also supplement the existing services and facilities in the surrounding area and encourage more sustainable travel patterns for those residing in proximity to the growth area.</p> <p>Kodiak does not object to the provision of additional infrastructure being secured on site or through off-site contributions, providing that such contributions are proportionate to the scale of the development on each site and otherwise meet the tests outlined in the CIL regulations. Kodiak also supports the requirement for 20% of the development on site to be affordable.</p> <p>At present, the policy does not explain why a maximum of 600 dwellings is identified on the site; Kodiak would suggest that the submission version of the plan should contain an analysis of the capacity of the growth area and ensure sufficient flexibility is built in. Kodiak supports the assertion at 7.4.17 of the supporting text that subject to appropriate testing, further development could occur on other land within the growth area</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>Policy 20 Wigston Direction for Growth Area allocates land for at least 600 new homes (for Phase 2), it does not suggest that 600 new homes is the maximum number of new homes for this area in this Phase.</p> <p>In addition, Policy 2 Spatial Strategy for Development within the Borough, also suggests that there is a further potential 300 new homes which would comprise Phase 3. As the Plan suggests, the delivery of such Phase is planned for the post 2031 period, however should evidence suggest a need to do so, the Phase could be brought forward subject to appropriate testing and subsequent review of the Local Plan. The location of such further Phase is a logical and sustainable extension to an existing site allocation.</p> <p>It should also be noted that the site Kodiak Land is promoting through its submission, is allocated within Policy 2 Spatial Strategy for Development within the Borough, and is taken account of in Table 1 of the Plan and the subsequent housing delivery trajectory.</p>

		<p>should evidence suggest a need to do so in the future. However, we consider that in line with our suggestion to allocate additional dwellings in this plan, over and above the housing requirement to provide additional flexibility, the Council should allocate additional land beyond the growth area boundary, at the west of Welford Road, notably to the north of the land promoted by Kodiak through this representation. This land would effectively be surrounded by development once the allocations in this plan are built out, and it would cease to contain the attributes of 'open' countryside and be unable to perform its functions. The land has also previously been allocated for a potential Park and Ride site so the Council have previously recognised its limitations as open countryside instead preferring it as a site for potential development. Allocation of additional land to the west of Welford Road would complete the logical extension of Wigston in accordance with the aims and objectives of the Direction for Growth area.</p>	
13.12.17	Historic England	<p><u>Key Focus Areas</u></p> <p>Bullet 11 should be updated to include reference to settings in order to reflect the NPPF and ensure a sound plan, such as:- "Conserve and enhance heritage assets and their settings."</p>	<p>Comment noted. The Council is proposing minor modifications to the Local Plan from the comments received from the Historic England for the reasoning set out below.</p> <p>The Council propose to add 'and their settings' to bullet 11 of the Key Focus Areas section of the Plan. It is considered that the wording would better reflect that of the NPPF.</p>
13.12.17	Historic England	<p><u>The Spatial Objectives, page 25</u></p> <p>Spatial Objective 12: Enhancing local heritage In order to more closely reflect the NPPF and ensure a sound plan, reference to 'settings' should be included and 'preservation' substituted for 'conservation', such as:- "To encourage the enhancement and conservation preservation of historically significant</p>	<p>Comment noted. The Council is proposing minor modifications to the Local Plan from the comments received from the Historic England for the reasoning set out below.</p> <p>The Council propose to amend the text of Spatial Objective 12 as suggested by Historic England as it is considered that the wording would better reflect that of</p>

		buildings and heritage assets and their settings , archaeological sites, conservation areas, parks ...”	the NPPF.
13.12.17	Historic England	<u>Policy 3</u> The second bullet point to ‘conserve and enhance heritage assets and their settings’ is strongly welcomed.	Comment of support noted.
13.12.17	Historic England	<u>Policy 16</u> Bullet point 9 is strongly welcomed.	Comment of support noted.
13.12.17	Historic England	<u>Policy 17 Kilby Bridge Settlement Envelope</u> Due to the very close proximity of the Grand Union Canal Conservation Area to the south, the inclusion of a key objective for heritage assets within the policy is strongly welcomed. A supporting paragraph outlining the particular importance of the Grand Union Canal Conservation Area would strengthen this policy. The site is within an area of ridge and furrow. Please ensure that the advice of the County Archaeological Advisor is sought.	Comment of support noted. The Council will ensure that if any development is proposed within the Kilby Bridge Settlement Envelope, the County Archaeological Advisor will be consulted for comments. It should be noted, that Local Plan Policy 41 Conservation Areas has more information relating to the Grand Union Canal Conservation Area. The Policy also seeks the conservation and preservation of all of the designated Conservation Areas within the Borough.
13.12.17	Historic England	<u>Policy 18 Stoughton Grange Direction for Growth</u> Development at this location would require very careful design due to the numerous heritage assets nearby, including those within the site and at Evington and Stoughton. Supporting paragraph 7.2.5 is welcomed; reference should also be made to the numerous heritage assets at Evington to the north west and Stoughton to the north east. The policy should be revised to include reference to the other heritage assets and their settings close to the site. Whilst the requirement for a detailed masterplan is welcomed, the need for a detailed Heritage Impact Assessment should be included within the policy.	Comment noted. The Council is proposing minor modifications to the Local Plan from the comments received from the Historic England for the reasoning set out below. The Council proposes to include the need for a Heritage Impact Assessment within Policy 18 Stoughton Grange Direction for Growth upon the advice of Historic England. The Council proposes the following wording in the 1 st sentence of the 4 th paragraph (directly below the bullets). <i>‘Any proposal for development of this growth area will be required to conform to all other relevant policies set out within this Plan and should be accompanied by</i>

		<p><u>Qadby Cemetery Allocation</u> Due to the proximity of the site to the moated grange at Stoughton scheduled monument, the County archaeologist should be consulted.</p>	<p><i>a Heritage Impact Assessment'</i></p> <p>The Council will ensure that the County Archaeologist is consulted should a development proposal for the cemetery allocation be submitted to the Council.</p>
13.12.17	Historic England	<p><u>Smaller sites</u></p> <p>A site specific policy would be helpful for the following sites due to potential impact upon the significance of heritage assets:-</p> <p><u>Off Long Street</u></p> <p>The site is within The Lanes Conservation Area, with numerous other heritage assets within the vicinity including Grade I and II* Listed buildings. As such, the development will require particularly careful design in relation to heritage assets; a site specific policy would help to ensure this.</p> <p><u>Off Station Street</u></p> <p>The site is within South Wigston Conservation Area, with other heritage assets close by, including the Grade II* Church of St Thomas. The office section of the depot, an attractive feature within the Conservation Area, should be incorporated into the scheme if possible – a site specific policy is therefore suggested.</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>All development proposals on the 'smaller site' allocations will need to conform to relevant policies set out within the Local Plan. Due to the location of the Long Street and Station Street allocations, both Local Plan Policy 40 Culture and Historic Environment Assets and Local Plan 41 Development in Conservation Areas will apply. The Council considers that these policies provide sufficient wording for the management, conservation and enhancement of heritage assets and their settings for any development proposed within such locations.</p>
13.12.17	Historic England	<p><u>Policy 32</u> is strongly welcomed.</p>	<p>Comment of support noted.</p>
13.12.17	Historic England	<p><u>Culture and Historic Environment Assets</u></p> <p>The inclusion of the 'List of locally significant buildings' is strongly welcomed within Appendix 3 together with its' link to policy 40. Policy 41 is also strongly welcomed, and in particular 'new shop fronts and advertisements in Conservation Areas'.</p>	<p>Comment of support noted.</p> <p>Paragraph 156 of the NPPF states that local planning authorities should set out strategic priorities for the area in the Local Plan and this should include strategic policies. The Council considers that both Local Plan Policy 40 Culture and Historic Environment Assets and Local Plan 41 Development in Conservation Areas are</p>

		The policies should be strategic and this should be made clear within the Local Plan, in order to comply with the NPPF. Paragraph 156 of the NPPF stresses that Local Plans should include strategic policies to deliver conservation and enhancement of the historic environment.	strategic in nature, however that they have specific elements to them, for example new shop fronts and advertisements within the conservation area. With the Local Plan being the predominate planning policy document for all development within the Borough up to 2031, the Council considers it appropriate to incorporate more locally specific policy elements within the two policies mentioned.
13.12.17	Landmark Planning (Bowbridge Land)	<u>Page 20 - Key Focus Areas</u> The recognition of the need to provide sufficient land to meet objectively assessed housing needs (OAHN) as a key focus is welcomed as is the need for house types and tenures that meets the needs of all the community.	Comment of support noted.
13.12.17	Landmark Planning (Bowbridge Land)	<u>Page 24 – Spatial Objective 7 (Growth of Leicester PUA)</u> This objective is supported, however, reliance on the Leicester Principal Urban Area (PUA) as a driver for growth harks back to the approach of the now superceded Regional Plan. This reference should be replaced with an intention to support sustainable development that relates to the expansion of the urban areas of Oadby, Wigston and South Wigston rather than a need for these developments to be 'directly adjacent to the Leicester PUA'.	Comment noted. No proposed change to the Local Plan document for the reasoning set out below. Spatial Objective 7: Growth of the Leicester PUA does not state a reliance on the Leicester PUA as a driver for growth. The Spatial Objective seeks a number of growth areas that are directly adjacent to the existing Leicester PUA that are logically and well connected. The Council considers locating planned growth adjacent to existing well connected urban areas is considered sustainable, when compared to disconnected standalone growth.
13.12.17	Landmark Planning (Bowbridge Land)	<u>Page 25 – Spatial Objective 13 (Green Wedges)</u> This objective should re-iterate the purpose of Green Wedges and the role that they perform rather than emphasising their 'blanket' protection from anything other than exceptional development. Recognition that not all of the new development required to meet the housing needs of the Borough can be accommodated within the existing urban areas is supported. However, it is clear that additional greenfield land releases will be	Comment of support noted. Due to the Borough's predominant urban nature, green open spaces, in particular green wedges, are extremely important for biodiversity as well as the local (human) communities. Spatial Objective 13 illustrates the Council's desire to protect these green wedge areas from inappropriate development. The detail of how and why these are should be protected (from inappropriate development) and enhanced, and their purpose and

		required.	<p>roles are set out within Local Plan Policy 42 Green Wedges. It should also be noted, that one of the Council's Corporate Priorities illustrated on page 6 of the Council's Local Plan, states that the Council will deliver 'Green and Safe Places'.</p> <p>In addition, the Council has undertaken a Green Wedge Review. The purpose of the Council's Green Wedge Review is to assess the boundaries of the existing green wedge designations, as defined on Council's Saved Local Plan Proposals Map and the Council's Adopted Policies Map. The review took into account the Broad Location for Growth Areas identified within the Strategic Housing Land Availability Assessment and the options for greenfield release sites identified within the Council's Preferred Options Local Plan consultation document.</p>
13.12.17	Landmark Planning (Bowbridge Land)	<p><u>Page 27 paragraph 4.2.7</u></p> <p>The implicit recognition that greenfield land releases are required in order that the authority meets it's OAHNA is welcomed and this reflects representations made on behalf of Bowbridge Land (and others) in respect of the previous Local Plan consultation. As I indicated in these representations, my clients feel that the land at Sutton Close should be considered as an option for greenfield land release either as a separate Direction for Growth (DfG) or as an extension of the Cottage Farm Residential Allocation, to which Policy 21 refers.</p>	Comment of support noted.
13.12.17	Landmark Planning (Bowbridge Land)	<p><u>Page 28 Table 1: Housing delivery for the Plan period</u></p> <p>As indicated above, my clients support the need for further greenfield land releases but feel that there is scope for these to be increased to include the land at Sutton Close. The suggested 'allocation' of 205 homes on unidentified sites within the town centre of Wigston</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>Table 1: Housing delivery for the Plan period, sets out the how the Council proposes to fulfil the Plan period (up to 2031) target of 2960 additional dwellings. The Council considers that the levels of development</p>

		<p>and/or the district centre of Oadby and 250 homes on unidentified sites elsewhere provides no certainty in respect of delivery for developers, the authority or for prospective residents. It is suggested that categories F and H are combined and reduced by 200 dwellings (i.e. to 255 dwellings) and the figure within category G be increased by 200 dwellings to 1359 dwellings to allow the allocation of the Sutton Close site. It is unclear how the projections for category F and H sites set out in Figure 1 (page 29 of the consultation) have been arrived at so it is assumed that these have been extrapolated from previous performance within the Borough.</p> <p>It is clear from the annual dwelling totals in Figure 1 that the Borough needs a 'step-change' in housing delivery in 2018/19 onwards to meet its OAHN. That being the case, it is even more important that the authority allocates sufficient land for development that will definitely be delivered rather than relying on identified sites that may or may not come forward for development.</p> <p>The land at Sutton Close Road, Oadby (page 46 of the 2012 SHLAA) was considered unsuitable and unachievable in this assessment but this 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. 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). Vehicular access to the land could be provided via either Sutton Close and/or Tilton Drive.</p>	<p>proposed within the table and the subsequent housing trajectory are developable and deliverable over the Plan period. It would be inappropriate of the Council to include sites or development opportunities that were deemed undevelopable or undeliverable.</p> <p>Row F of the table specifies the remaining number of new homes allocated through the Council's adopted Town Centres Area Action Plan (205). With the Council owning the majority of the sites allocated within the Area Action Plan and it having recently set up an housing delivery company, the Council is confident that such levels of development will be fulfilled within the Plan period. It should also be noted that the Council has an adopted Local Development Order for town centre sites within Wigston.</p> <p>Row H of the table relates directly to the small sites allocations specified within Local Plan Policy 2 Spatial Strategy for Development within the Borough. All of the sites allocated have been subject to recent SHLAA assessment and have been found developable and deliverable within the 5 year period. It is also worth noting that a number of the sites allocated are currently progressing through the planning application submission process and the Council is a landowner of the certain sites specified. The Council is therefore confident that the 250 units specified within row H will come forward within the Plan period up to 2031.</p> <p>It is also worth noting that the Council (within Local Plan Policy 2) has identified land for up to an additional 400 units as a 'buffer' should growth over the Plan period not come forward as expected.</p>
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		Bearing in mind the requirements for any local plan to meet the tests of soundness (in particular, the requirement for the plan to be positively prepared and justified), it is considered that the inclusion of the land at Sutton Close would ensure that the plan is founded on the most appropriate strategy.	
13.12.17	Landmark Planning (Bowbridge Land)	<p><u>Page 32 – Direction for Growth Areas</u></p> <p>Paragraph 4.2.31 details the three Direction for Growth areas that the Council have chosen to accommodate the bulk of the housing growth over the Plan period. Whilst the Wigston and Cottage Farm DfGs are robust as they are essentially based on committed sites, the Stoughton Grange DfG is a new proposal. This DfG is envisaged to accommodate approximately 300 new dwellings yet it contains a new transport route connecting Gartree Road with Leicester Road (the A6). This transport route was previously referred to as the Leicester Eastern District Distributor Road (LEDDR) and it has been a 'bottom drawer' plan that Leicestershire County Council have had a desire to deliver for many decades. It is unclear whether the development of the Stoughton Grange DfG relies on the delivery of this transport route but this is considered highly questionable for a number of reasons. These include it's lack of funding, the need for compulsory purchase of the rear gardens of a number of residential properties at Meadowcourt Road, Wych Elm Road, Holly Close and Ringers Spinney, the significant adverse environmental impact of the new road on a large number of existing properties along the route as detailed above and also including Southmeads Close, Southmeads Road, Manor Close and Manor Road. If the delivery of the DfG is not reliant on the LEDDR, it is unclear why it is referred to in the allocation and on the Adopted Policies Map.</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>Local Plan Policy 18 Stoughton Grange Direction for Growth area and Oadby Cemetery Allocation requires that the route of the former Eastern District Distributor Road (EDDR), now Potential Transport Route is safeguarded.</p> <p>The safeguarding of the route in this instance, is only relevant to the land area contained within the Borough and does not extend beyond the Borough boundary. As part of the evidence base for the Local Plan, the Council, in collaboration with Leicestershire County Council, Harborough District Council and Leicester City Council, commissioned Edwards and Edwards Consultancy Ltd to produce the South East Leicestershire Transport Study. Part of the remit of the study was to assess the likely impact of the potential transport route should it be built out.</p> <p>The study concluded that, should the route be built out, there would be likely benefits to traffic undertaking orbital movements linking the Fosse Park industrial / commercial areas and the M1 junction with the PUA area to the East of Leicester City. The results also show that traffic from Oadby and Wigston would potentially make use of the scheme using Brabazon Road to access the A6 rather than using the B582 through New Street in Oadby.</p>

			It should be noted that the delivery of the Stoughton Grange Direction for Growth Area is not dependant on the delivery of the safeguarded potential transport route. The Local Plan safeguards the route.
13.12.17	Landmark Planning (Bowbridge Land)	<p><u>Page 34 – Policy 2 Spatial Strategy for Development within the Borough</u></p> <p>As indicated above, my clients are concerned about the strategy for the delivery of the required number of houses as this relies upon identified sites in the within the town centre of Wigston and/or the district centre of Oadby and 250 homes on unidentified sites elsewhere. My clients are also concerned about the delivery of the Stoughton Grange DfG for the reasons set out above. The 250 additional homes detailed in Policy 2 are existing commitments rather than meeting residual needs. This could be positively addressed with the allocation of the Sutton Close land for c200 dwellings as indicated above.</p>	Comment noted.
13.12.17	Landmark Planning (Bowbridge Land)	<p><u>Page 44 - Policy 6 High Quality Design and Materials</u></p> <p>The positive approach to design and materials is supported. This accords with guidance contained in paragraph 59 of the NPPF and avoids being overly prescriptive in design matters.</p>	Comment of support noted.
13.12.17	Landmark Planning (Bowbridge Land)	<p><u>Page 50 - Policy 8 Green Infrastructure</u></p> <p>Paragraph 114 of the NPPF states that, "Local planning authorities should:</p> <ul style="list-style-type: none"> • set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure; and Paragraph 5.5.12 of the Pre-submission version of the Local Plan notes that the proposed Direction for Growth area 	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>As Local Plan Policy 42 Green Wedges suggests, the role and purpose of green wedges is not just to separate the two settlements of Oadby and Wigston. The objectives of green wedges in the Borough are to; prevent the merging of settlements; guide development form; provide a 'green lung' between the urban area and the countryside; and, act as a recreational resource.</p>

		<p>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 that 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 as desired by policy 9 (Open Space, Sport and Recreation Facilities). This can not be achieved, however, with the retention of the designation of the land as Green Wedge. The land at Sutton Close lies is situated in a sustainable location and does not clearly meet the objectives of green wedge designation, particularly given the proposal to allocate the adjoining land to the south east at Cottage Farm. The purpose of the Oadby and Wigston Green Wedge is to separate the two settlements and this could still be achieved by retaining the land immediately between the two settlements (the land to the north west, south west and south east of the Sutton Close site).</p> <p>Reflecting 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</p>	<p>Due to the predominately urban nature of the Borough, access into green open areas of green wedge and the countryside beyond is vital.</p> <p>In relation to the suitability of the land to the south of Sutton Close, through the SHLAA and Local Plan Call for Sites process, in addition to the land being designated as green wedge, the Council had concerns regarding the access to the site. The site had no obvious formal access route. Such concerns were clarified in an email conversation with Landmark Planning dated the 21st June 2017 that stated the site could not be accessed currently and that the best access option would be to demolish an existing residential property. Although it was suggested in the email that a discussion was taking place with a home owner, the Council received no further update to these discussions.</p> <p>The Council concluded that allocating a site with no formal means of access was not positive planning, nor offered any degree of certainty that development in this location could actively be delivered.</p>
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		the development would have no significant adverse impact on the landscape character of the area.	
13.12.17	Landmark Planning (Bowbridge Land)	<p><u>Page 58 – Policy 11 Housing Choices</u></p> <p>My clients support the desire to ensuring all new residential developments comprise of a mix of dwelling types, tenures and sizes meeting the needs of communities and new prospective residents. It is intended that these aims would be delivered in any development of the land at Sutton Close.</p>	Comment of support noted.
13.12.17	Landmark Planning (Bowbridge Land)	<p><u>Page 60 - Policy 12 - Housing Density</u></p> <p>Paragraph 47 of the NPPF allows Local Planning Authorities to set their own density policies, however, it is considered that policy 12 is unrealistic in respect of the need to achieve 40 dwellings to the hectare in areas outside of the town centre of Wigston and district centre boundaries of Oadby and South Wigston. As indicated in my representations on the previous version of the Plan, 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 the Plan ineffective in terms of the soundness tests.</p> <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. 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>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>Within the Council’s Local Plan Preferred Options Consultation document, a two tiered approach to housing density was promoted. In summary, the approach sought 50 dph within town centre locations and 40 dph for all other locations. Having considered representations relating to dph, the Council amended the Local Plan to promote a three tiered approach. 50 dph was sought in town centre locations, 40dph in the rest of the Leicester PUA and 30 dph elsewhere.</p> <p>In producing the Local Plan the Council took account of the Department for Communities and Local Governments ‘Fixing our broken housing market’ white paper (February 2017) and the HM Treasury Autumn Budget 2017, both of which encourage local authorities to build at higher densities in appropriate locations.</p> <p>The Council considers that the three tiered approach, relating to the location of development proposals is appropriate for the Borough, taking account of its predominately urban compact form.</p>

13.12.17	Landmark Planning (Bowbridge Land)	<p><u>Page 63 - Policy 13 Affordable Housing</u></p> <p>My clients support the desire to ensuring all new residential developments provide affordable housing as part of their delivery and support the suggested percentages set out in the draft policy.</p>	Comment support noted.
13.12.17	Landmark Planning (Bowbridge Land)	<p><u>Page 127 - Policy 42 Green Wedges</u></p> <p>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.</p> <p>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 tests of soundness. My clients object to the designation of the land at Sutton Close within the Oadby and Wigston Green Wedge for the reasons set out above. The objectives of Green Wedges are set out in policy 42 and it is clear that (particularly given the proposed allocation of land adjoining this site at Cottage Farm for residential development within the Green Wedge) the land at Sutton Close does not prevent the merging of the two settlements, it does not significantly guide development in this area, it does not demonstrably provide a 'green lung' between the urban area and the countryside, nor does it act as a recreational resource given the lack of public access to it.</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>As evidence base for the Local Plan, the Council undertook a Green Wedge Review. The Review document concluded that <i>'overall the Oadby and Wigston Green Wedge fulfils all of the functions as set out in the agreed Leicester and Leicestershire Green Wedge Review Joint Methodology. It provides the settlements of Leicester City, Wigston and Oadby with access to a largely undeveloped area of open space that leads out into the south Leicestershire countryside; it guides the form of development effectively, particularly the urban built form of Oadby, Wigston and Leicester City; it provides a recreational resource, with the likes of Brocks Hill Country Park, allotment spaces, a former golf course and the Leicester Racecourse; and, it ensures that the urban areas of Oadby, Wigston and Leicester City do not merge into one entity, thus losing their individual character and distinctiveness. The green wedge is also a key component of the Borough's Strategic Green Infrastructure network where it acts as a Strategic Green Infrastructure Corridor'</i>.</p> <p>The Review document also set a number of recommendations for the Oadby and Wigston Green Wedge. None of these recommendations sought to remove any pieces of land from the existing boundary extent.</p>
13.12.17	North West Leicestershire	We have reviewed the document from a strategic aspect, assessing any potential implications for this	Comment noted.

	District Council	district. It is noted that you propose to meet your identified housing and employment needs in full. We support this approach and have no further comments to make at this stage.	
13.12.17	Tetlow King	The Plan recognises in Chapter Three " <i>the need for a diverse mix of housing types and tenures that are accessible to all will mean that all residents will have a safe and secure home to live in.</i> " We note that there is an identified need for 148 affordable housing units to be delivered per annum within the Borough to 2031 (paragraph 2.3.8). Spatial Objective 8 seeks a mix of housing opportunities to meet local housing needs, including a mix of type, tenure and affordability. Rentplus would make a positive contribution to the affordable housing offer within the Borough, offering affordable rented properties with the long term aim of home ownership.	Comment noted. No proposed change to the Local Plan document for the reasoning set out below. For clarity, paragraph 2.3.8 of the Plan does not state that the annual affordable housing need for the Borough is 148 dwellings. The text states – <i>'the most up to date Housing and Economic Development Needs Assessment (HEDNA) illustrates an Objectively Assessed Housing Need for the Borough of 148 new homes per annum up to 2031. This OAN figure includes the need for affordable housing.'</i>
13.12.17	Tetlow King	Without serious intervention housing affordability in Oadby and Wigston will continue to worsen, leaving behind those households unable to afford a home. This makes the delivery of more, and a more diverse range, of affordable housing one of the main priorities of the Local Plan. As a rented tenure, rent to buy can meet a very significant proportion of needs across the Borough without reliance on public funding and unlike starter homes and other tenures does not require an upfront deposit to access. For this reason, in response to Policy 11 we suggest that it would be beneficial for the Council to include specific consideration of this tenure updating the wording to enable delivery of this tenure across the Borough. The below changes are recommended to improve the effectiveness of this policy, ensuring it remains effective over the lifetime of the Plan: <i>"All residential development should contribute towards</i>	Comment noted. No proposed change to the Local Plan document for the reasoning set out below. Under The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017, national government requires local planning authorities to review the Local Plan every 5 years from date of adoption. At paragraph 1.5.6 to 1.5.7 the Council specifies the monitoring clause of the Local Plan. The clause states that the Council will review the Local Plan in part or in full no later than five years from adoption. Due to the above, the Council does not consider that the proposed wording addition should be made to the policy wording. The HEDNA is the current evidence base for housing needs within the local authority area, as well as the wider Leicester and Leicestershire Housing Market Area (HMA) and has been jointly

		<i>delivering a mix of dwelling types, tenures and sizes that meet the identified needs (and / or demand) 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 more up-to-date evidence of housing need."</i>	signed up to by all HMA local authorities. Deviating from this joint evidence base would not be appropriate and could have impacts in other local authority areas.
13.12.17	Tetlow King	<p>Rentplus seeks to deliver high quality, affordable housing to local people that aspire to own their own home, through a partnership approach with locally active housing associations, to combine local experience and knowledge with each housing association's ambitions to house local people.</p> <p>Whilst there is mention of starter homes within paragraph 6.3.6, the Housing White Paper consultation suggested a number of other affordable housing tenures that may be included within an updated NPPF. The Government has set out in successive consultations its plan to expand the definition of affordable housing as currently set out in Annex 2 of the NPPF; recent statements in the House of Commons, including by the Communities Secretary Sajid Javid, strongly suggest that rent to buy will be included in the next update to the NPPF as a separate tenure. Indeed, the Minister for Housing and Planning, Alok Sharma, recently confirmed in a letter that rent to buy can help increase access to home ownership, and that the tenure will be accounted for in working up the revised definition of affordable housing. We now expect consultation on an update to the NPPF in early 2018 followed by publication of a revised NPPF in April / May 2018. Rent to buy was included in the Housing White Paper Box 4 proposed definition; for this reason, Policy 13 should include consideration of rent to buy within the tenure split.</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>Local Plan Policy 13 Affordable Housing, sets out the Council's approach to affordable housing. The definition of affordable housing that the Council will utilise when applying the policy will be that set out by national government in its relevant planning policy and guidance. The Local Plan policy does not specify specific affordable housing tenures, other than Starter Homes, and even then states that provision will be done so in conformity with national government guidance and policy at the time of consideration of a planning proposal.</p> <p>The Council would encourage the use of the Rentplus model on appropriate planning application proposals, however does not feel it appropriate to specify the Rentplus (product) model as a specific tenure. The Council considers that there is flexibility in the current policy regarding tenure splits, which could encapsulate the Rentplus model or any other appropriate similar model where appropriate.</p>
15.12.17	Gordon White and	Chapter 2 - Spatial Portrait Comments – GWH (Ellis	Comments noted.

	Hood	<p><u>Farm, Kilby Bridge)</u></p> <p>Section 2.3.12 – Tourism plays a small yet important role in the area – this would and could be enhanced by opening up the lake and public open spaces as shown on the drawing for inclusion within an amended local plan. The change to a conservation area within private ownership would not be beneficial to the local community and tourism. A small car park would aid the traffic and parking issues in the area.</p> <p>Section 2.4.3 – makes reference to the SSSI, with the new proposal as shown this area could be opened up to the public and extended into a new managed area. This would be made possible with the addition of a small scale residential extension as indicated within the report.</p> <p>Section 2.5.1 refers to areas of flooding to Kilby Bridge, this site is not part of the flood zone this is to the south of the canal.</p> <p>Section 2.6.1 refers to tourism, which would be enhanced by our proposals. Protection of the environmental and biodiversity would be enhanced by managed extensions to the SSSI and possible public access to areas currently in private ownership. Potential flooding issues, see above. The settlement is a gateway to the borough from the south, the current amenity is poor and lacks any coherent design, small scale development and enhancement to the existing buildings on the main road with new residential and possible nursing / assisted living properties would enhance the views into the area. The parking of cars on the verges and land in front of our site is currently detracting from the Gateway to the area.</p>	
15.12.17	Gordon White and	Section 3.1.13 refers to increased opportunity to access	Comment noted. No proposed change to the Local Plan

	Hood	<p>open countryside in Kilby Bridge, this is currently not possible due to the lack of pathways and parking areas, our proposed scheme allow for the possible rebuilding of the bridge across the canal and the use of some of the private land for public access.</p> <p>Section 3.2.1 objective 14 – refers to regeneration of the settlement of kilby bridge, but without additional areas capable of being developed this is hard to achieve, our small scale development allows for the enhancement of the area and better access enhancing the environmental and heritage access.</p>	<p>document for the reasoning set out below.</p> <p>Local Plan Policy 17 Kilby Bridge Settlement Envelope states that the Council will consider small scale development proposals within the defined Settlement Envelope of Kilby Bridge. The policy makes provision for up to 40 new additional dwellings within the defined settlement envelope.</p> <p>The extent of the settlement envelope defined within the Local Plan consists of the existing brownfield areas of Kilby Bridge settlement, part of which is designated conservation area. The Council considers that the existing brownfield elements of the Kilby Bridge are capable of delivering each element of the policy and there is not a need to extend the defined settlement envelope beyond the existing brownfield areas into open countryside.</p>
15.12.17	Gordon White and Hood	<p><u>Policy 2 – Spatial Strategy for Development within the Borough Comments – DWH (Ellis Farm, Kilby Bridge)</u></p> <p>Section 4.2.11 – refers to the possibility of up to 40 new homes within the Kilby Bridge area, the whole of Kilby Bridge is around 20,000 sqm the useable, easily developed areas behind the housing to the west and the car showroom equate to around a useable area of 13,700 sqm which would give a very high development footprint which would create mass housing with small plots, totally against all other planning policies for the area. With the addition of an expansion of the Kilby bridge settlement boundary of around 13,000 sqm this would allow more sympathetic development of the area as a whole allowing the area to achieve the required number of houses. It must be remembered that the area of the existing settlement boundary includes some areas of flood zone 3, the extension of the boundary onto the ellis farm site is outside this flood area.</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The western parcel of land situated adjacent to the Grand Union Canal (within the settlement envelope) has been proposed for redevelopment by the Canal and Rivers Trust (in partnership with H2O Urban) for 16 new canal side residential dwellings, along with small scale retail and boating facilities.</p> <p>Through Local Plan consultations (including the most recent consultation), Wheatcroft Properties Limited have promoted a site (within the settlement envelope) for up to 3 new residential dwellings to the western side of Kilby Bridge also.</p> <p>The above equates to 19 new residential dwellings to the western side of Kilby Bridge.</p>

			<p>Taking account of the above, the full 40 additional new homes at Kilby Bridge be realised over the plan period, a further 21 residential units would be delivered on the 1.37h land area to the east (of Welford Road) described by Gordon White and Hood as usable. Crude calculations illustrate (21 / 1.37) that to fulfil the 21 units on 1.37h of land would require a density of approximately 15 dwellings per hectare. The current minimum dwellings per hectare target set out within Policy 17 Kilby Bridge Settlement Envelope, is 30 dwellings per hectare.</p> <p>The current minimum dwellings per hectare target set out within Policy 17 Kilby Bridge Settlement Envelope, is 30 dwellings per hectare.</p> <p>Taking account of the above, the Council considers that the proposed settlement envelope defined within the Local Plan has sufficient capacity to accommodate (up to) 40 dwellings over the Plan period.</p>
15.12.17	Gordon White and Hood	<p>LOCAL PLAN PRE SUBMISSION CONSULTATION DOCUMENT COMMENTS:-</p> <p>Section 7.1.1 refers to the redevelopment of the area as outlined above , 40 houses, tourism etc but without bringing in additional land for the housing and opening up current privately held land for the use of the public this can not be achieved.</p> <p>Section 7.1.2 refers to future master planning of the area, this has already been shown as a possible masterplan on our scheme, without the addition of extra housing land the requirements of the local plan can not be achieved.</p> <p>Section 7.1.4 – refers to the creation of a marina within the area, again reducing the number of housing sites to</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The western parcel of land situated adjacent to the Grand Union Canal (within the settlement envelope) has been proposed for redevelopment by the Canal and Rivers Trust (in partnership with H2O Urban) for 16 new canal side residential dwellings, along with small scale retail and boating facilities.</p> <p>Through Local Plan consultations (including the most recent consultation), Wheatcroft Properties Limited has also promoted a site within the settlement envelope for up to 3 new residential dwellings. Combined, these two sites equate to 19 new residential dwellings to the western side of Kilby Bridge.</p>

		<p>the area, a marina would not be financially viable without some development opportunities.</p> <p>Section 7.1.5 – policy 17 refers to a minimum development density of 30 dwellings per hectare with is against the nature of the site as a whole and would lead to an overdevelopment density of the existing areas available for development. The policy goes onto state that the key objectives are to maintain the open, attractive and rural setting of the area, at 30 per hectare as a minimum this would not occur unless additional land is made available.</p> <p>Section 7.4.13 – our proposal will actively encourage the promotion of healthy lifestyle etc by opening up a privately held land area for the public with additional walkways and footpaths.</p> <p>The local plan refers to a wish list for the Kilby Bridge Settlement area which includes tourism, housing, marina, starter units and enhancement of the area considered as a gateway to Wigston. This has been addressed in our documentation.</p>	<p>Taking account of the above, in order for the full 40 additional new homes at Kilby Bridge be realised over the plan period, a further 21 residential units would be delivered on the 1.37h land area to the east (of Welford Road) described by Gordon White and Hood as usable. Crude calculations illustrate (21 / 1.37) that to fulfil the 21 units on 1.37h of land would require a density of approximately 15 dwellings per hectare. The current minimum dwellings per hectare target set out within Policy 17 Kilby Bridge Settlement Envelope, is 30 dwellings per hectare.</p> <p>The current minimum dwellings per hectare target set out within Policy 17 Kilby Bridge Settlement Envelope, is 30 dwellings per hectare.</p> <p>Therefore, the Council considers that the proposed settlement envelope defined within the Local Plan has sufficient capacity to accommodate up to 40 dwellings over the Plan period.</p> <p>It should be noted that Kilby Bridge is the Borough areas only rural settlement, and in essence is a rural hamlet. The Council, through the Local Plan is seeking to retain its unique and individual rural character through small scale development and regeneration opportunities.</p>
15.12.17	Gordon White and Hood	<p>We have been in consultation with the planning policy department and were led by their comments to include and promote the whole of the Ellis Farm site for a large housing scheme, we originally showed the smaller 6-7 property scheme outlined in this report. The planning policy team wanted to see the possibility of fully developing the site with sympathy given to the canal and the SSSI. See the scheme put forward for original consultation with the policy team for consideration as part of the emerging local plan. This scheme has in</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>Due to the proximity of the large housing scheme to the Limedelves SSSI, its relationship with the Grand Union Canal conservation area, its situation in the Countryside, its highways impact, and its dominating scale in relation to the existing settlement area of Kilby Bridge, the Council did not consider large scale development appropriate.</p>

		<p>effect been ignored.</p> <p>Notwithstanding the above, the overall and underlying aim for this proposed extension to the development area has been to provide dwellings, community facilities, and a site layout that respond appropriately and sympathetically to the landscape and context with controlled visual impact and with sustainable design at its core.</p> <p>The site proposed is well located for inclusion within the Oadby & Wigston master concept plan utilising an isolated area of land between the railway line and the Grand Union Canal. The proposals are sympathetic to the ecological and rural nature of the site whilst addressing the known housing need.</p> <p>The environment agency have confirmed that the site lies outside of any known fluvial or tidal floodplains and is therefore at little risk of flooding.</p> <p>The external alterations to the existing buildings serve to enhance the quality of the local built environment.</p> <p>The proposed new-build dwelling concept serves to harness the vistas towards the surrounding open countryside and landscape features through careful orientation and arrangement on the site. This also, with the additional land allows for the development and opening up of the private land into public ownership.</p> <p>The new-build dwellings and assisted living will seek to exploit the latest energy efficient technologies, whilst utilising site orientation and topography to ensure high levels of self-sufficiency and sustainability within the development.</p>	<p>The extent of the settlement envelope defined within the Local Plan consists of the existing brownfield areas of Kilby Bridge settlement, part of which is designated conservation area. The Council considers that the existing brownfield elements of Kilby Bridge are capable of delivering each element of the policy and there is not a need to extend the defined settlement envelope beyond the existing brownfield areas into open countryside.</p> <p>Kilby Bridge is the Borough's only non-urban settlement and is rural in nature. The Council considers that Local Plan Policy 17 Kilby Bridge Settlement Envelope is completely appropriate in relation to the settlement, location, situation, extant designations, scale, size and environmental value. The Council seeks to retain the settlements rural history and character, however is aware that the settlement needs some small scale sympathetic development in order to enable regeneration of the hamlet.</p>
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15.12.17	Leicester City Council	<p>Chapter One - Introduction Para 1.1.1 (Page 4)</p> <p>It is welcomed that the plan recognises the strong spatial relationship between the Borough and the City. The two authorities share many planning issues such as green infrastructure, economic and housing growth,</p>	Comment of support noted.

		retail provision and local services etc. The City wishes to continue to work collaboratively with the Borough on cross boundary planning matters.	
15.12.17	Leicester City Council	<p>Para 1.1.2 (Page 4)</p> <p>This paragraph states that: 'Leicester City Council is the only two tier unitary authority situated within Leicester and Leicestershire area;'</p> <p>The City Council is a unitary authority and the reference to 'the only two tier' should be deleted.</p>	<p>Comment noted. The Council is proposing minor modifications to the Local Plan from the comments received from Leicester City Council for the reasoning set out below.</p> <p>For clarity, the final sentence of paragraph 1.1.2 will be amended to –</p> <p><i>'Leicester City Council is the only two tier unitary authority situated within...'</i></p>
15.12.17	Leicester City Council	<p>Para 1.1.3 (Page 4)</p> <p>The plan recognises the strong strategic planning relationship across the wider Leicester and Leicestershire Housing Market Area (HMA). The City Council is committed to working with Oadby & Wigston Borough Council and all the other authorities within the HMA on HMA wide strategic planning issues, including the emerging Strategic Growth Plan.</p>	Comment of support noted.
15.12.17	Leicester City Council	<p>Para 1.5.2 (Page 8)</p> <p>Paragraph 1.5.2 of the plan refers to the Strategic Growth Plan, noting that it will treat the period up to 2031 and then from 2031 to 2050 differently. In terms of housing need, in the period to 2031 it is recognised that there is sufficient capacity within the HMA to meet the overall housing needs of the HMA albeit that the actual distribution of the HMA wide housing need will need to be considered through individual local plans.</p>	Comment noted.
15.12.17	Leicester City Council	<p>Para 1.5.6 (Page 8)</p> <p>The plan includes a mechanism at (para 1.5.6) where a review of the plan would commence when a 'local</p>	<p>Comment noted.</p> <p>The statement made within paragraph 1.5.6 does not exclude Oadby and Wigston Borough Council. The</p>

		<p>authority within the Leicester and Leicestershire HMA has an evidenced unmet need, which cannot be met by the other local authorities within the Leicester and Leicestershire HMA and / or within the flexibility allowed within this Plan’.</p> <p>Whilst we support the principle of such mechanisms, we would question the wording of the trigger where it states that Oadby and Wigston would only consider the issue of unmet need if the other authorities in the HMA cannot fully address the unmet need between them. We would suggest that the redistribution of any unmet need should be approached jointly between all authorities in the HMA, so that any outstanding unmet need is redistributed sustainably and to an agreed strategy.</p>	<p>wording – ‘...which cannot be met by other local authorities’ is relevant to the each of the HMA local authorities equally.</p> <p>The Council is committed to working with all other local authorities within the Leicester and Leicestershire Housing Market Area on all Duty to Cooperate issues / topics, specifically unmet housing and / or employment need.</p>
15.12.17	Leicester City Council	<p>Para 4.2.5 (Page 27)</p> <p>We welcome the recognition at paragraph 4.2.5 that the City has declared an unmet need in the period to 2031 (and beyond) and that its unmet need will have to be accommodated elsewhere in the HMA. Whilst the scale of unmet need will not be fully quantified until the draft Leicester Local Plan has developed further, it is expected to be significant. We would therefore expect emerging local plans within the HMA to set out how they will help respond to Leicester's unmet need over the time period of the plan.</p> <p>Para 4.2.11 (Page 28)</p> <p>We therefore welcome that the plan (at paragraph 4.2.11) refers to an overprovision of housing supply of around 400 dwellings which 'could help fulfil a small proportion of Leicester City's declared unmet need'.</p>	Comment of support noted.
15.12.17	Leicester City Council	Para. 4.2.12 (Page 28)	Comment noted. The Council is proposing minor modifications to the Local Plan from the comments

		<p>'Should evidence suggest a need for further development at the Wigston Direction for Growth area (Phase 3), it would be subject to appropriate testing, in particular, highway and transport infrastructure capacity, and liaison with the Borough Council and Leicestershire County Council Highways department.'</p> <p>This sentence should also include Leicester City Council Highway Authority, where relevant.</p>	<p>received from Leicester City Council for the reasoning set out below.</p> <p>The addition of Leicester City Council's highway department in paragraph 4.2.12 is considered appropriate due to the close spatial link with the two local authority areas.</p> <p>The Council is proposing the following minor amendment –</p> <p><i>'Should evidence suggest a need for further development at the Wigston Direction for Growth area (Phase 3), it would be subject to appropriate testing, in particular, highway and transport infrastructure capacity, and liaison with the Borough Council, Leicester City Council's Highways Department and Leicestershire County Council Highways department.'</i></p>
15.12.17	Leicester City Council	<p>Policy 2 Spatial Strategy for Development Within the Borough - p36</p> <p>The City Council welcomes the statement that the Borough will work in partnership with local authorities to coordinate the provision of funding of infrastructure and facilities to meet the needs of planned development. This is especially important with regard to cross boundary issues.</p>	<p>Comment of support noted.</p>
15.12.17	Leicester City Council	<p><u>Open Space, Sport and Recreation Facilities – paras 5.6.9 + 5.6.13 (table) – (Page 53)</u></p> <p>There is a shortage of high quality cricket provision within the City. The Plan should meet the needs of the intended population for open space and sports provision and provide a high quality cricket provision to help meet the City's needs. Currently, there is no finalised Playing Pitch Strategy for Oadby and Wigston</p>	<p>Comment noted.</p> <p>The Council has now completed the production of its Playing Pitch Strategy. The Strategy illustrates that the Borough can meet its own needs in all sports and has surplus in both football and cricket provision which could contribute towards meeting a proportion of Leicester City's need.</p>

		<p>within the Pre-Submission evidence base. The website indicates that this document will be published in 2018. This is a concern, considering this issues the city is facing with regard to sports provision. The City council requests that any sporting provision within Oadby and Wigston, that helps meet the city's needs, is maintained. The City reserves the right to discuss this further with the National Governing Bodies and Sport England as plans develop.</p>	<p>According to the report, the Borough area is already meeting some of Leicester City's cricket need, with both of the teams that play in the Borough being registered in the Leicester City area.</p> <p>It should also be noted that the Council's Local Plan has allocated three direction for growth areas, all of which will be required to provide onsite open space, consisting of allotments, sports pitches, play areas and structural landscaping in accordance with other relevant Local Plan policy. Such onsite provision of sports pitches would add to the Borough's current supply and could further meet the needs of Leicester City in the future should there be a need to do so.</p> <p>All relevant National Governing Bodies, in particular Sport England, have been involved in the production of the Council's Playing Pitch Strategy and have been consulted on the content of the strategy. All comments received during consultation were fully incorporated into the strategy.</p> <p>As part of the Council's annual monitoring, the Strategy will be kept up to date and robust on an ongoing basis.</p>
15.12.17	Leicester City Council	<p><u>Policy 6 - High Quality Design and Materials (Page 45)</u></p> <p>After the bullet point '- encouraging sustainable means of travel;' consider adding the following text:- <i>including walking, cycling, other forms of non-motorised transport and public transport.</i></p>	<p>Comment noted. The Council is proposing minor modifications to the Local Plan from the comments received from Leicester City Council for the reasoning set out below.</p> <p>To illustrate key examples of sustainable means of travel and add clarity, the Council is proposing the following amendment to bullet 8 of Policy 6 –</p> <p><i>'encouraging sustainable means of travel, including walking, cycling and public transport'.</i></p>
15.12.17	Leicester City Council	<p><u>Policy 6 – High Quality Design and Materials (Page 45)</u></p>	<p>Comment noted. The Council is proposing minor modifications to the Local Plan from the comments</p>

		Change the 9th bullet point to read '- connects effectively and efficiently to existing routes and developments , by avoiding dead ends and convoluted routes, to allow it to integrate in to the wider settlement and to link to existing services and facilities.	received from Leicester City Council for the reasoning set out below. To add clarity to the bullet 13 of Policy 6 the Council is proposing the following amendment – <i>'connects effectively and efficiently to existing routes and developments, by avoiding dead ends and convoluted routes, to allow it to integrate in to the wider settlement and to link to existing services and facilities'.</i>
15.12.17	Leicester City Council	<u>Para. 7.4.12 (page 76)</u> The following sentence should be included in this paragraph:- <i>"To collaborate with Leicester City Council Highway Authority, where relevant, if adverse impacts on the city's highway are identified and / or there are opportunities for new or improved sustainable transport links into Leicester."</i>	Comment noted. The Council is proposing minor modifications to the Local Plan from the comments received from Leicester City Council for the reasoning set out below. The Council considers that a minor amendment to the final sentence of paragraph 7.4.12 will cover the point made by Leicester City Council rather than the new sentence proposed by Leicester City Council. The Council proposes to amend the final sentence of paragraph 7.4.12 to – <i>'Required infrastructure relating to this growth area will be that agreed by Leicestershire County Council Highways department, Leicester City Council Highways department and the Borough Council'.</i>
15.12.17	Leicester City Council	<u>Policy 21 - Cottage farm Direction for Growth area (page 81)</u> The following wording should be included in the policy:- <i>"To collaborate with Leicester City Council Highway Authority, where relevant, if it is found that the development impacts onto the city's highway network and / or there are opportunities for new or improved</i>	Comment noted. The Council is proposing minor modifications to the Local Plan from the comments received from Leicester City Council for the reasoning set out below. The Council considers that a minor amendment to the final sentence of Policy 21 will cover the point made by Leicester City Council rather than the new sentence

		<i>sustainable transport links into Leicester.”</i>	<p>proposed by Leicester City Council.</p> <p>The Council proposes to amend the final sentence of Policy 21 to –</p> <p><i>'Any proposal would also be required to submit a detailed Transport Assessment as part of any planning application to ensure that Leicestershire County Council Highways department and Leicester City Council Highways department can fully assess any traffic / transport implications stemming from the development.'</i></p>
15.12.17	Leicester City Council	<p>Para. 8.7.12 – (Page 97)</p> <p>The Eastern District Distributor Road is a long standing Highway Improvement Scheme and we will continue to retain the scheme until such a time that decisions have been made about how to address the problems of access & traffic movements around the Eastern side of Leicester as highlighted by the South East of Leicester Transport study (Edwards & Edwards, 2017).</p> <ul style="list-style-type: none"> • Policy 26 Sustainable Transport and Initiatives (Page 97) • Draft Adopted Policies Map <p>The City welcomes that Oadby and Wigton’s section of the EDDR transport route is to be safeguarded on the Oadby and Wigton’s Draft Adopted Policies Map.</p> <ul style="list-style-type: none"> • Delivering Economic Prosperity <p>The City Council supports the proposals for employment in O & W pre-submission draft plan.</p>	<p>Comment of support welcomed.</p>
15.12.17	Leicester City Council	<p>Taxis – (Page 112)</p> <p>Paragraph 9.10.1 recognises that taxi control offices</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p>

		<p>could be operational 24 hours a day and waiting vehicles and customers can have significant noise, pollution and traffic generation impacts which can be to the detriment of neighbouring uses, especially when located in a residential area.</p> <p>Suggest that the provision of an electric vehicle charging hub for electric taxis be included in the policy (as a method for improving air quality).</p>	<p>Although the Council would always encourage the use of electric taxi vehicles and subsequent charging points, the Council is not aware of any evidence to suggest that the Local Plan should require the provision of electric charging points for electric taxis through development.</p> <p>Should evidence suggest the need for electric taxi vehicle charging points in the future, the Council will amend the Local Plan accordingly in a subsequent review.</p>
15.12.17	Leicester City Council	<p>Chapter Eleven – Delivery Plan Paragraph 11.1.10 - 11.1.12</p> <p>The City Council supports the recognition that development in the Borough could have negative impacts on infrastructure in other local authority areas.</p> <p>Infrastructure Delivery Plan</p> <p>The Council notes the suite of policies relating to strategic infrastructure, and will seek to work closely with the Borough on infrastructure requirements that may impact on the City arising from growth.</p>	<p>Comment of support welcomed.</p>
15.12.17	Sport England	<p>Sport England supports the corporate priorities around health, wellbeing and other priorities which support sport and active recreation.</p> <p>We also support the vision but perhaps would add 'active' to the line,..... high quality, healthy and active lifestyles...</p>	<p>Comment noted. The Council is proposing minor modifications to the Local Plan from the comments received from Sport England for the reasoning set out below.</p> <p>The Council is proposing to amend the third paragraph of the Vision, to take account of Sport England's comment. The proposed wording is as follows –</p> <p><i>'Residents in the Borough will have the opportunity to enjoy peaceful, harmonious, high quality and healthy active lifestyles...'</i></p>
15.12.17	Sport England	<p>Support para 3.1.9, 3.1.10, 5.2.1 and 5.2.8 and <u>spatial</u></p>	<p>Comment of support welcomed.</p>

		objectives 6 and 9 also policies 5 and 6 – Sport England believes Active design can support these objectives and help to create sustainable communities by the delivery of policy objectives.	
15.12.17	Sport England	<p>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 in the master planning process for new residential developments. The document can be downloaded via the following link:</p> <p>http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/</p>	<p>Comment noted.</p> <p>The Council is committed in creating healthy and active communities. The Council will ensure that the use of Sport England's Active Design guide is encouraged in all masterplanning or large scale development proposals.</p>
15.12.17	Sport England	<p><u>Policy 7 Community facilities</u></p> <p>It is noted that that this policy does not included sports facilities but it should be noted that community facilities can contribute to active recreation and the health and wellbeing of communities.</p>	<p>Comment noted. The Council is proposing minor modifications to the Local Plan from the comments received from Sport England for the reasoning set out below.</p> <p>The Council agrees that community facilities can play an important role in the communities health and wellbeing and can be places of recreation. The Council proposes to amend the final sentence of paragraph 5.4.2 to –</p> <p><i>'They are a key part of sustainable communities and can contribute positively towards community health, recreation and wellbeing'.</i></p>

15.12.17	Sport England	Para 5.5.6 are the opportunities referred to in this para supported by the wording of <u>policy 8</u> ?	<p>Comment noted.</p> <p>The Council considers that the opportunities referred to in paragraph 5.5.6, namely exercise, sport and informal recreation, although not specifically stated, are supported by the wording of Policy 8 Green Infrastructure.</p> <p>The safeguarding and enhancement of existing strategic green infrastructure assets and the creation of new multifunctional areas of green space provide spaces in which the local communities can utilise for exercise, sport and informal recreation.</p> <p>The Council considers that the outcome of the policy, a net gain in green infrastructure assets will provide more green spaces that allow for the opportunities referred to by paragraph 5.5.6.</p>
15.12.17	Sport England	<p><u>Section on Open Space, Sport and Recreation Facilities</u></p> <p>Support the playing pitch strategy (PPS) ref in paras 5.6.9 and 5.6.13. This is however based on the continued works to complete the PPS</p> <p>See the section protect provide and enhance in our guidance</p> <p>https://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/</p> <p>https://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p>	<p>Comment of support welcomed.</p> <p>The Council has now completed the production of its Playing Pitch Strategy. The Strategy illustrates that the Borough can meet its own needs in all sports.</p> <p>The Council has worked closely with Sport England on the production of the Playing Pitch Strategy.</p> <p>All relevant National Governing Bodies, in particular Sport England, have been involved in the production of the Council's Playing Pitch Strategy and have been consulted on the content of the strategy. All comments received during consultation were fully incorporated into the strategy.</p>
15.12.17	Sport England	Sport England is content with the references to built sports facilities and therefore supports <u>policy 9</u>	Comment of support welcomed.

15.12.17	Sport England	A reference to active design could be added to all the policies in <u>Chapter Seven</u> – Allocations and Regeneration Opportunity areas.	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The Council is committed in creating healthy and active communities. The Council will ensure that the use of Sport England’s Active Design guide is encouraged in all masterplanning or large scale development proposals, for example the site allocations illustrated in Chapter Seven of the Local Plan.</p>
15.12.17	Sport England	<p><u>Chapter Eight – Economic Prosperity</u></p> <p>Sport England would advise of our economic value of sport toolkit</p> <p>https://www.sportengland.org/research/benefits-of-sport/economic-value-of-sport/</p>	<p>Comment noted.</p> <p>The Council will seek to utilise the Sport England Economic Value of Sport – Local Model when assessing relevant development proposals.</p>
15.12.17	Saffron Tree Action Group (STAG)	<p><u>Local Green Space Designation</u></p> <p>A) Good that the majority of the submitted Local Green Spaces in South Wigston are included as fulfilling the Government criteria, and are formally proposed as allocations on the Adopted Policies Map.</p> <p>B) Good that Local Green Spaces are now in Chapter 10, Protected Places – a much more appropriate position than Chapter 5, Healthy Communities, in the previous iteration of the Plan.</p> <p>C) Policy 45, page 131. This is now weaker because instead of just stating that any development proposal which will result in the loss of a Local Green Space will not be permitted, the following wording has been added: “...unless the harm of losing the asset is significantly outweighed by the benefits of the proposed development.” This addition seems to be in direct contradiction of the NPPF guidance that this designation would have a high degree of protection</p>	<p>Comment of support for points A and B welcomed.</p> <p>The National Planning Policy Framework (NPPF) at paragraph 78 states that <i>‘local policy for managing development within a Local Green Space should be consistent with policy for Green Belts’</i>. At paragraph 87 of the NPPF it is stated that <i>‘as with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances’</i>.</p> <p>In addition NPPF paragraph 89 to 91 specify the types of development that would be appropriate (by exception) with Green Belt designation areas.</p> <p>To ensure consistency with national planning policy, the Council amended the previous Local Green Space wording (Preferred Options Local Plan document) to add a level of flexibility that does not preclude all development. The Council considers that not having the amended wording that allows some development, ie,</p>

		<p>from new development. In addition, local authorities are left to determine how to implement this in partnership with local communities. In our view the Council should use this autonomy to plan for full protection – and remove the added wording in the quote. That would fit with the outline of NPPF guidance in paras 1.28 and 1.29 of the Non technical SA summary, that the NPPF requires policies to deliver : <i>"conservation and enhancement of the natural and historic environment"....</i></p> <p>And <i>"identify land where development would be inappropriate, for instance because of its environmental or historic significance:</i></p> <p>It's notable that the wording on Conservation areas in Policy 41, wis much more robust – listing circumstances in which development <i>"will not be permitted."</i> There isn't a comparable caveat <i>"unless the harm outweighs the benefits."</i> If this can be left out for Conservation Areas – surely it can be left out for Local Green Space?</p> <p>D) Local Green Spaces are currently in a silo – there is no cross referencing in any other part of the Plan. The designation needs to be more fully integrated - with references at appropriate points in the text of other chapters.</p>	<p>should the harm of losing the asset be significantly outweighed by the benefits of the development, would not be consistent with the NPPF.</p>
15.12.17	Saffron Tree Action Group (STAG)	<p><u>Policy 3: Regeneration Schemes and Large scale change</u></p> <p>A) The Policy (p38) lists the things which masterplans and development briefs should do, and includes, "conserve and enhance heritage assets and their settings". However, the list doesn't include, "Conserve and enhance Green Infrastructure assets and Local Green Spaces". It should.</p>	<p>Comment noted. The Council is proposing minor modifications to the Local Plan from the comments received from STAG for the reasoning set out below.</p> <p>For clarity the Council is proposing to add the bullet point wording set out below to Local Plan Policy 3 Regeneration Schemes and Large Scale Change.</p> <p><i>'Conserve and enhance Green Infrastructure assets and Local Green Spaces'</i></p>
15.12.17	Saffron Tree Action	<u>Chapter 5: Cohesive Communities</u>	Comment noted. No proposed change to the Local Plan

	Group (STAG)	<p>A) Section 5.2 on Improving Health and well being isn't as strongly cross referenced as it should be to Green Infrastructure and Local Green Spaces. A few simple additions would make this more strategically integrated – e.g. in paragraph 5.2.9: “...guard against the unnecessary loss of valued facilities and services <i>including Green Infrastructure and Local Green Spaces.</i>” Reference to access to natural green space, open spaces, and Green Infrastructure should also be added in to Policy 5.</p>	<p>document for the reasoning set out below.</p> <p>Throughout the Local Plan document, there are appropriate references and cross references to health and wellbeing and green and open spaces, for example Spatial Objective 9 and paragraphs 5.2.3, 5.6.1, 10.1.5 and 10.6.1.</p> <p>It should be noted that two of the five Council Corporate Priorities are focused on green and safe places and wellbeing for all.</p>
15.12.17	Saffron Tree Action Group (STAG)	<p><u>Policy 8: Green infrastructure</u></p> <p>A) Puzzled why Green Infrastructure hasn't also been moved into Protected Places, Chapter 10. Given that Policy 1 is now far more explicit in relation to “Presumed Development”, it makes it even more important to be clear about mitigation plans to ensure that irreplaceable environmental and heritage assets are “Protected Places”.</p> <p>B) Local Green Spaces need to be cited as an integrated part of the Green Infrastructure, to avoid the risk of the designation being treated as in a silo. At a minimum Local Green Spaces should be included in the list of assets in paragraph 5.5.5. In addition, a new paragraph 5.5.14 should be added briefly describing the designation and cross referencing to Chapter 10 and policy 45.</p> <p>C) The first sentence of Policy 8 should include reference to Local Green Spaces: “...the preservation and enhancement of open spaces and assets that comprise the Borough’s Green Infrastructure and its network, <i>including Local Green Spaces.</i>”</p> <p>D) Policy weakened through loss of the bullet point</p>	<p>Comment noted.</p> <p>It should be noted that the location of a policy within the Local Plan document does not have an effect on its ‘weight’ or ‘effectiveness’. It is merely how the document has been structured. The Council however would have no objection to moving Local Plan Policy 8 to a different chapter of the document if it was deemed appropriate.</p> <p>The Council is proposing minor modifications to the Local Plan from the comments received from STAG for the reasoning set out below.</p> <p>For consistency it is proposed the Local Green Spaces is contained within the list in Local Plan paragraph 5.5.5 as show below.</p> <p><i>‘...local green spaces, cemeteries, sports fields...’</i></p> <p>With the proposal to include local green spaces as part of the list set out in Local Plan paragraph 5.5.5, the Council does not consider it necessary to include local green spaces in the policy, as the policy in its opening paragraph states <i>‘...open spaces and assets that comprise the Borough’s Green Infrastructure and its</i></p>

		<p>that was in the previous draft:</p> <ul style="list-style-type: none"> • <i>"not permitting development that compromises the integrity of the overall Green Infrastructure networks:"</i> 	<p><i>network'.</i></p> <p>The Council considers that the removal of the bullet point referred to, does not weaken the policy. The overall objective of the policy is to not permit development that compromises the integrity of the overall green infrastructure network, and the policy sets out requirements by which the objective will be achieved.</p>
15.12.17	Saffron Tree Action Group (STAG)	<p><u>Chapter 7 – Regeneration Areas</u></p> <p>A) These sections on the sites identified for potential development need to be strengthened by including explicit reference to protecting extant mature trees and hedgerows, and conditions requiring planting, and contribution to future maintenance, of trees.</p>	<p>Comment noted.</p> <p>All development that is proposed within the Borough area will need to conform to all relevant policies set out within the Local Plan. Although some areas within the Borough have specific policies relating to them, for example the direction for growth areas, it does not mean that other relevant policies set out in the Plan become irrelevant, they have the same relevance as with any development proposal.</p>
15.12.17	Saffron Tree Action Group (STAG)	<p><u>Section 8.7. Transport and section 9.9. Car Parking</u></p> <p>A) Good to see more, and stronger references to provision for cycling at various places through the plan – including in this section.</p> <p>B) Good that the commitment to free town centre car parking has also now gone. About time – it was environmentally inappropriate, and financially unsustainable.</p>	<p>Comment of support noted.</p>
15.12.17	Saffron Tree Action Group (STAG)	<p><u>Section 10.1 and Policy 37 Biodiversity and Geodiversity</u></p> <p>A) Would be strengthened by addition of commitment to planting trees and ensuring succession for areas of the Borough with mature tree-scape, where succession planting is essential to ensure sustainability. Would fit</p>	<p>Comment noted.</p> <p>The supporting text and policy wording of Local Plan Policy 37 Biodiversity and Geodiversity seeks the planting of trees by mitigating any loss of assets (trees) through applying measures for reinstatement, replacement or on / off site compensatory work. Any</p>

		<p>in para 10.1.5 and in Policy 37.</p> <p>B) It remains the case that none of the references to the Biodiversity Audit make explicit that it doesn't cover the whole Borough – only those parts which are proposed for potential development. It's essential that whenever the Biodiversity Audit is cited it should be clear that it only covers part of the Borough and that there are additional biodiversity and geodiversity assets which are not included in the baseline.</p>	<p>development proposals that effect assets (relevant to Local Plan Policy 37), would need to conform to the policy.</p> <p>It should be noted that any references within the Local Plan to evidence base documents are just references. The evidence base documents themselves will set out the level of detail that the comment (B)) is referring to. The Council does not consider that references to evidence base documents need to be accompanied by additional information that is found within the documents themselves.</p>
15.12.17	Saffron Tree Action Group (STAG)	<p><u>The Sustainability Assessment Non-Technical Summary</u></p> <p>A) Our view remains strongly that the changes to the wording used by LUC at SA 8 severely undermines the protection of green assets. As we argued in response to the previous draft, by opting for "biodiversity and geodiversity" the potential for protection is seriously weakened, because the bar is set way higher on designated sites – whereas the majority of natural green space throughout the Borough is non-designated, not least because of the limits of the Biodiversity Audits and the Green Infrastructure Plan. We are still of the view that the previous wording should be re-instated: <i>"To protect and enhance the natural landscape and green spaces and provide opportunities for public access to the countryside"</i>. That wording is entirely consistent with the NPPF strategic priority re protecting the environment. We don't view justification of the changed wording of SA8 in terms of ease of monitoring as sound.</p> <p>B) The SA papers fail to take full account of the historic and environmental significance of Local Green Spaces. It looks as though the designation is being</p>	<p>Comment noted.</p> <p>As has been clarified following consultation representations received at the Preferred Options SA stage the Council received specific advice concerning the changes to the SA Objectives in the SA Framework and their associated SA Assumptions prior to the commencement of that consultation period and are in agreement with LUC that the changes were necessary. In order to make the SA Objectives more robust, focused and compliant with the SEA Regulations, LUC advised the Council to amend SA2 and SA8 and a further SA Objective (SA9) was added. This allowed for a SA Framework which is more precisely focussed on the individual SEA topics thereby allowing the effects of the new Local Plan to be identified, pulled out and appropriately considered. Previously, SA8 would have considered both SEA topics (a) biodiversity and (l) landscape together meaning that effects on these topics would be more difficult to distinguish from each other.</p> <p>The Council and LUC are confident that the changes and the updated approach to the SA framework allow for a more rigorous assessment of the Local Plan's</p>

		<p>treated by LUC assessors as if it's still in Chapter 5, Healthy Communities. In the table on page 17 there is a green assessment against SA6 and SA7 (re healthy community) – but only a weak assessment against SA7, 8, and 9 re historic environment, biodiversity and geodiversity, and Landscape. These are key features of the designation and the community commitment to protecting them – so they should be given due significance in the SA assessments.</p> <p>C) Very few references to Local Green Spaces – (only at para 1.86). Local Green Spaces should be cited, for example, in para 1.6; and Policy 45 should be referenced as significant in the third, seventh, eighth, and ninth right hand boxes of Table 1 summarising Sustainability Issues on pp 6 and 7.</p> <p>D) P. 40 monitoring table – re SA8 – should include monitoring re conditions protecting hedgerows and requiring succession tree planting.</p>	<p>impact on biodiversity (SA8), access to the countryside (SA2) and impact upon the landscape (SA9). The SA framework is presented in Table 2.2 in the full SA Report (Table 2 in the SA Report: Non-Technical Summary). In regard to this comment (particularly with regard to the issue of impact on the countryside and green space and related impacts on access and biodiversity) the SA framework should be considered in combination with the SA Assumptions in Table A4.1 of Appendix 4 of the full SA Report. The SA Assumptions have not been included in the Non-Technical Summary given the summary nature of this document. The SA Assumptions demonstrate how access to the countryside has been considered as part of the appraisal for SA2, as well as how development within the countryside or a green space which has the potential to adversely impact upon biodiversity has been considered as part of the appraisal of SA8. SA8 does not focus solely on designated sites given that the assumption includes the consideration for 'development site options within the countryside or a green space (which) could have a minor negative effect on biodiversity'. Ultimately 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 and the individual SEA topics.</p> <p>The individual SA objectives are part of the larger SA framework and are considered together to appraise a site or policy option. All sites and policies considered have been appraised against each of the SA Objectives.</p> <p>The Pre-Submission Local Plan includes Policy 45 to ensure the protection of Local Green Spaces in Chapter 10. The SA Report has reflected this including the corrected new policy number (45 – the policy number was previously 5.7 in the Preferred Options Local Plan).</p>
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			<p>Please see Table 4 in the Non-Technical Summary and Table 4.10 in the full SA Report.</p> <p>The full SA Report shows that Policy 45 has been considered as sitting as part of Chapter 10 – Protected Places in the Local Plan. Please see Table 4.8 which shows a summary of the likely sustainability effects of the policies in this chapter as well as the preceding text from paragraph 4.86 which gives a summary of the likely sustainability effects of the policies in this chapter. Detailed justification in relation to each SA Objective against which Policy 45 has been appraised is presented in Appendix 9 of the full SA Report (page 955). This information has not been re-presented in SA Report: Non-Technical Summary given the summary nature of this document.</p> <p>Policy 45 in the Local Plan sets out the Council’s approach to the designation of Local Green Spaces and how/in what circumstances they should be protected. As such this policy and therefore the protection which Local Green Spaces are afforded in the Local Plan have been given the same level of consideration as other policies contained in the Local Plan. The SA Report: Non-Technical Summary presents only a summarised version of the likely sustainability effects of each policy and site contains in the Local Plan. In this regard the cumulative effects considering the policies in the plan and the allocated sites are presented from paragraph 1.47. The positive effects that Policy 45 and the protection of Local Green Spaces are likely to have with regard to SA5 (social inclusion), SA6 (integrated communities) and SA9 (landscape) in paragraphs 1.63, 1.68 and 1.86 respectively have been highlighted given that these are the SA objectives against which Policy 45 is expected to have the most significant positive effects. The full appraisal of this policy and the</p>
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			<p>justification for the sustainability effects recorded against each of the SA objectives is presented in Appendix 9 from page 952 of the full SA Report.</p> <p>Table 1 in the SA Report: Non-Technical Summary presents an overview of the key sustainability issues for the Borough. These issues have been highlighted following an establishment of the baseline conditions for the Borough as presented in Appendix 3 of the full SA Report. The right hand column reflects the likely evolution of each issue identified if the Local Plan was not put in place. The right hand column does not make reference to any policies in the emerging Local Plan as in this scenario the policies in this document have not been adopted. For example pressure for development on open space in Oadby and Wigston has been identified as a key sustainability issue which Local Green Spaces might play a role in preventing. Policy 45 is not reflected in the right hand column however given that the Local Plan would not be in place and instead existing policies in the Core Strategy would be depended upon to address this issue.</p> <p>The SEA Regulations require that "the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme". As such it is considered appropriate for the Proposed Monitoring Framework presented in Table 10 in the SA Report: Non-Technical Summary and Table 7.1 of the full SA Report to focus on indicators for monitoring the potential significant sustainability effects of implementing the Local Plan. As highlighted in paragraph 1.151 while no significant cumulative adverse effects have been identified through the SA Report a precautionary approach has been taken to monitor indicators where uncertainty has been recorded against the related SA objective.</p>
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			The proposed monitoring indicators are those which can be actively monitored; i.e. those for which data is forthcoming. Monitoring relating to the condition of protecting hedgerows and requirements to plant trees is considered to be overly onerous and potentially unmeasurable given that data to support this monitoring is unlikely to be available.
15.12.17	Blaby Parish Council	<p>Blaby Parish Council is pleased to see there are no current plans to develop the open countryside adjacent to our Parish.</p> <p>We are pleased to note that Oadby and Wigston are planning to meet their housing need but are concerned that may impact on Welford Road and Hospital Lane in Blaby Parish.</p> <p>We would therefore like to be kept informed and consulted on any further or future developments.</p>	<p>Comment of support noted.</p> <p>The South East Leicestershire Transport Study undertaken as evidence base for the Local Plan highlights the severity of the congestion within the Borough, specifically along its routes as well as at its junctions.</p> <p>The Council is aware of the limitations of the existing highway network and has sought to locate development within locations that have the least detrimental impact.</p>
17.12.17	GVA (Land North of Newton Lane)	<p>Plan Period</p> <p>The National Planning Policy Framework ('NPPF') provides guidance on the preparation of Local Plans. At Paragraph 157, the second bullet states that Local Plans should be "<i>drawn up over an appropriate timescale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date</i>".</p> <p>The Pre-Submission version of the Plan proposes a plan period extending from 2011 to 2031. The Council's most recent Local Development Scheme, published in</p>	<p>Comment noted.</p> <p>Response to these representations is set out in the Local Plan Spatial Strategy Submission document that the Council has produced for Local Plan Submission.</p>

		<p>2017, states that the Council expects the Plan to be adopted in 2018. If that were the case, then the Plan would be due to expire within 13 years of adoption, and so would not look across a fifteen year timeframe as preferred by the NPPF. It would also be incapable, in our view, of taking account of longer term requirements. Consequently, we conclude that the proposed plan period is in conflict with Paragraph 157 of the NPPF, and is therefore not sound on this basis.</p> <p>It is worth also noting, though, that when the Council published the Local Plan 'Key Challenges' document for consultation in November 2015 (in other words, its 'Issues and Options' document), it invited consultees to comment on a proposed housing target of 95 dwellings per annum up to 2036. Similarly, the 'Preferred Options' document, published in November 2016, assumed a 20 year plan period, with a base year of 2016 and an expiry year of 2036. In other words, it is evident that the Council was seeking to plan for the period up to 2036. At that time, up-to-date evidence on housing need in Leicestershire was not available.</p> <p>However, the Pre-Submission version of the Plan now only proposes a plan period extending to 2031, with the base year rolled back to 2011. Paragraph 1.2.6 of the Pre-Submission version states that the plan period extends to 2031 "<i>in order to align with the Strategic Growth Plan and to enable effective co-operative working with other local planning authorities in the Leicester and Leicestershire HMA over Plan periods</i>". It goes on to say, with specific reference to the Strategic Growth Plan, that, "<i>the Strategic Growth Plan... focuses on the period post 2031, for which it identifies a 'notional housing need'. It recognises that for this period there are no reliable estimates of population growth or household change, thus it estimates future</i></p>	
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		<p><i>housing needs by projecting forwards the annual figures set out within the HEDNA [Housing and Economic Development Needs Assessment]”.</i></p> <p>At Paragraph 1.5.3, the Council states that, <i>“to ensure that the Leicester and Leicestershire HMA housing and employment OAN is fulfilled up to 2031, a Statement of Cooperation and subsequent Memorandum of Understanding will be produced...”.</i></p> <p>We understand that the Strategic Growth Plan is a document being prepared jointly by the Leicestershire authorities and the Leicestershire Local Enterprise Partnership. Its purpose, among other things, is to give consideration to the distribution of housing growth across the Leicestershire housing market area, particularly in the light of Leicester City Council being unable to meet its objectively-assessed need within its administrative area (see subsequent Sections). We have reviewed a ‘Consultation Draft’ version of the Strategic Growth Plan dated 7 November 2017. This too considers housing needs issues from a baseline of 2011 to both 2031 and 2036, in order <i>“to align with the different time periods for which Local Plans are currently being prepared”</i> (Appendix A of the Strategic Growth Plan, page 21).</p> <p>The quotes from the Pre-Submission version of the Local Plan given above would appear to be at odds with the latest version of the Strategic Growth Plan, which states that (our emphasis added), <i>“For the period beyond 2036, there are no reliable estimates of population growth or household change, nor economic forecasts, but we need to have some understanding of how much growth we might be expected to accommodate in future”</i> and that, <i>“the agreed distribution for the period 2011-36 will be set</i></p>	
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		<p><i>out in a Memorandum of Understanding which will be published in early 2018. This will be used as the basis for preparing or reviewing Local Plans with 2036 as an end date”.</i></p> <p>It appears, from our reading of the Strategic Growth Plan, that there is no reason why the Council cannot promote a plan period extending up to 2036. Indeed, we note that the Melton Borough Council Local Plan, which is currently being subject to Examination (and so is an emerging plan being prepared by another Leicestershire authority), proposes a plan period up to 2036.</p> <p>We also note that the Council’s principal source of evidence in relation to housing need (the Housing and Economic Development Needs Assessment, or ‘HEDNA’, prepared by GL Hearn, and others, on behalf of the Leicestershire authorities, and published in January 2017), reaches conclusions on objectively-assessed housing need up to both 2031 and 2036, with a base date of 2011 in each case. Paragraph 1.4 of the HEDNA main report states that two timeframes were used “<i>to reflect plan periods used in different authorities</i>”.</p> <p>As such, we do not accept the Council’s contention that the plan period must only extend to 2031 in order to align with the Strategic Growth Plan and plans being prepared by other Leicestershire authorities. The Strategic Growth Plan, and the HEDNA, both address the time period up to 2036, and so if the Council proposed a plan period to that year, as it contemplated doing in 2015 and 2016, then it would, we conclude, be aligned with those documents.</p> <p>We note that the consultation draft of the Strategic Growth Plan from November 2017 refers, at Appendix</p>	
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		<p>A, to a declaration made by Oadby and Wigston Borough Council that it would be unable to meet its objectively-assessed need for the period up to 2036 identified by the HEDNA. This is also reported in a Joint Statement of Co-Operation prepared by the Leicestershire authorities in November 2017; this latter document suggests that the Oadby and Wigston Borough Council reported this position in March 2017.</p> <p>On this basis, our client is concerned that the Council has sought to purposely reduce the plan period from 2036, as it previously proposed at the Preferred Options stage, to 2031, in order to avoid having to grapple with the housing need arising in that longer timeframe. This is further evidenced by the spatial strategy that the Council has proposed (and which we comment on in subsequent sections). In our view, this means that the Plan has not been positively prepared, and nor is it justified, because it does not deliver “<i>the most appropriate strategy</i>” as required by Paragraph 182 of the NPPF. In other words, the Plan fails these tests of soundness.</p> <p>We conclude that the Council could remedy these issues by reinstating the plan period to 2036 that it originally proposed at the Preferred Options stage.</p> <p>Representation</p> <p><i>On behalf of our client, we conclude that Chapter 1 of the plan is not positively prepared because it is not based on a strategy that seeks to meet objectively-assessed need. We also conclude that it is not justified because it does not deliver the most appropriate strategy. Finally, we conclude that it is inconsistent with national policy, as the NPPF directs that plan periods</i></p>	
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		<p><i>should be 15 years in length.</i></p> <p><i>We are of the view that the Council must revisit its proposed plan period and should look to prepare a plan which extends up to 2036.</i></p>	
17.12.17	GVA (Land North of Newton Lane)	<p>Presumption in Favour of Sustainable Development</p> <p>Paragraph 14 of the NPPF establishes a 'presumption in favour of sustainable development', the wording of which is now well-established and recognised. Paragraph 15 of the NPPF directs that policies in Local Plans should, "<i>follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should [have] clear policies that will guide how the presumption should be applied locally</i>".</p> <p>Draft Policy 1 of the Pre-Submission version of the Local Plan seeks to establish a 'presumption in favour of sustainable development'. The final part of proposed Policy 1 states that, "<i>should there ever be a time when the Plan is deemed absent or silent or out of date, the Council will not look upon development proposals positively, where the proposal is deemed unsustainable, and / or the adverse impacts associated with the proposal significantly and demonstrably outweigh the benefits...</i>".</p> <p>In our view, this wording is excessively negative, and fails to capture the positive thrust of Paragraph 14, which directs that planning permission should be granted unless any adverse impacts would significantly or demonstrably outweigh the benefits, or policies in the Framework indicate that development should be restricted. Put another way, it fails to recognise that</p>	<p>Comment noted.</p> <p>The Council would not object to the wording of the final paragraph of Local Plan Policy 1 Presumption in Favour of Sustainable Development being reworded subject to the intention / objective of the policy remaining the same.</p>

		<p>where Paragraph 14 is engaged, a 'tilted balance' is to be applied, as established in <i>Cheshire East Borough Council versus the Secretary of State for Communities and Local Government and Renew Land Developments Ltd.</i></p> <p>Accordingly, we conclude that the final paragraph of draft Policy 1 is inconsistent with the NPPF and requires amendment in order to accurately reflect the 'presumption' in Paragraph 14.</p> <p>Representation</p> <p><i>On behalf of our client, we conclude that Policy 1 is unsound because it is inconsistent Paragraph 14 of the NPPF. The Council should amend the wording of Policy 1 in order to be consistent with the NPPF.</i></p>	
17.12.17	GVA (Land North of Newton Lane)	<p>Housing Need and Delivery in Oadby and Wigston</p> <p>We have noted in Section 3 that the NPPF places at its heart the 'presumption in favour of sustainable development'. Paragraph 14 of the NPPF confirms that, for plan-making, the 'presumption' means, among other things, that "<i>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change</i>" (our emphasis added). In our view, this requirement is critical in the context of the direction at Paragraph 47 of the NPPF, that local authorities should "<i>boost significantly the supply of housing</i>". In other words, when preparing Local Plans, authorities should ensure that there is sufficient flexibility in their housing policies and allocations to enable objectively-assessed needs to be met within the plan period.</p> <p>The Pre-Submission version of the Plan states, at draft</p>	<p>Comment noted.</p> <p>Response to these representations is set out in the Local Plan Spatial Strategy Submission document that the Council has produced for Local Plan Submission.</p>

		<p>Policy 2, that the Plan will allocate “<i>sufficient land to provide at least 2,960 new additional homes</i>”. This equates to a housing target of 148 dwellings per annum between 2011 and 2031. The Council has stated at Paragraph 4.2.4 of the consultation document that this is taken from the ‘Housing and Economic Development Needs Assessment (‘HEDNA’) prepared by GL Hearn, Justin Gardner Consulting and Oxford Economics, and which was published in January 2017. The HEDNA was prepared on behalf of the Leicestershire authorities and addresses housing need across the housing market area. Jelson welcomes the Council’s decision to propose a housing target which reflects the objectively assessed need identified in the HEDNA.</p> <p>Table 1 on Page 28 of the consultation document states that between 1 April 2011 and 31 March 2017, 578 dwellings had been completed, while a further 768 dwellings were committed. Although this is not explicitly stated, we assume this means sites which benefitted from an extant planning permission at 31 March 2017.</p> <p>Consequently, the Council concludes that it only needs to provide 1,614 dwellings by 31 March 2031 in order to meet its objectively-assessed need. The remainder of Table 1 goes on to state that those 1,614 dwellings will be delivered through:-</p> <ul style="list-style-type: none"> i) the allocation of 205 dwellings on land in Wigston Town Centre and Oadby District Centre; ii) the allocation of 1,159 dwellings on sites in ‘Direction for Growth’ areas; and iii) the delivery of 250 dwellings on “<i>smaller allocation sites</i>” (that is, those which might accommodate between 11 and 99 units). 	
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		<p>Cumulatively, dwellings in those three categories add up to 1,614, and so balance the residual housing requirement up to 2031. This is in contradiction to the proposed wording of Policy 2, which states that the Council will allocate land to provide "<i>at least 2,960 dwellings</i>" (our emphasis added). From our reading of Table 1, the Council is seeking to allocate only enough land to provide no more than 2,960 dwellings.</p> <p>We note that later sections of the Pre-Submission document identify the following new Direction for Growth sites, along with notional capacities, as follows:-</p> <ul style="list-style-type: none"> • Wigston Direction for Growth Phase 2 – 600 dwellings; • Cottage Farm Direction for Growth Phase 2 – 250 dwellings; and • Stoughton Grange Direction for Growth – 300 dwellings. <p>Together these total 1,150 dwellings, and not 1,159 as stated in the Council's Table 1. Therefore, if the figure in Table 1 were accurately stated, then the Council would be 9 dwellings short of meeting its objectively assessed need up to 2031. Accordingly, on the face of it, it appears that the Council has, contrary to what it states in the Plan, not identified sufficient land to meet its objectively-assessed needs up to 2031.</p> <p>Moreover, even if the figures in Table 1 were correct, in order for the Council to meet its objectively-assessed housing need up to 2031, it will need all of the sites which had an extant planning permission at 31 March 2017 to be developed. The Council will also need all of the proposed allocations in the town and district</p>	
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		centres, on the proposed Direction for Growth sites, and on the 'smaller allocations' to be developed over the plan period, and to deliver the number of units expected by the Council. The corollary of that is that non delivery of any site with an extant planning permission, any failure of the proposed allocations to be developed, or delivery of fewer dwellings on the proposed allocations than the Council expects, will result in the objectively-assessed need for the Borough not being met. As a matter of principle, Jelson is of the view that this represents a highly inflexible approach, and means that the Plan is not positively prepared as a result.	
17.12.17	GVA (Land North of Newton Lane)	<p>Notwithstanding the above points, the Council goes on to state, at Paragraph 4.2.11, that "<i>there is an additional number of new homes that could be delivered up to the end of the Plan period 2031 [sic] or beyond</i>". The Council states that these additional dwellings comprise:-</p> <ul style="list-style-type: none"> • 40 dwellings within the settlement boundary of Kilby Bridge; • "<i>approximately</i>" 300 new dwellings on a potential Phase 3 of the Wigston Direction for Growth site; and • an assumed 70 windfall dwellings over the plan period. <p>The Council goes on to conclude that this "<i>buffer</i>" of circa 400 dwellings "<i>would negate any potential delivery issues on allocated sites</i>".</p> <p>While draft Policy 17 addresses itself to Kilby Bridge, and seeks to provide policy support for the development of up to 40 dwellings in the village, we note that the Council does not seek to formally allocate specific sites in that location to accommodate new dwellings. In our view, this raises uncertainty over the</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>Upon the publication of the HEDNA in January 2017, the Council has had to work extremely proactively and positively to meet its illustrated housing OAN. The housing OAN illustrated within the HEDNA (and subsequent Plan target) is a huge 'step change' for the Council. From planning for 90 dwellings per year, the Council has had to plan for 148 dwellings per year to fulfil its own OAN.</p> <p>The huge change / shift in housing requirement has meant that the Council has had to identify and allocate over 60 per cent more land than it would have been required to identify should the requirement have remained at 90 dwellings per year. The principal constraint for the Council, has always been its highway and transport infrastructure and network. The highway network within the Borough is currently severely congested along both its routes and its junctions; the levels of growth identified and allocated only exacerbate this further.</p>

		<p>extent to which 40 dwellings might be delivered in Kilby Bridge over the plan period. This is the reason, we presume, that the Council has not made an allowance for those 40 dwellings in its Table 1.</p> <p>The second component of the 'buffer' is a potential third phase of the Wigston Direction for Growth site. We understand that Phase 1 comprises the allocation in the adopted Core Strategy (which now benefits from planning permission) and Phase 2 is proposed for allocation in the new Plan. However, it is apparent that the Council is not looking to allocate Phase 3 in the Plan. Moreover, at Paragraph 4.2.12, the Council states (our emphasis added), <i>"Should evidence suggest a need for further development at the Wigston Direction for Growth area (Phase 3), it would be subject to appropriate testing, in particular, highway and transport infrastructure capacity, and liaison with the Borough Council and Leicestershire County Highways department. Any proposal would also be subject to the development being sensitive to the countryside areas that surround it and sustainable and appropriate in size and facility provision. This will be Plan led and will be considered through a future review of the Plan"</i>.</p> <p>From our reading of this statement, it is apparent that the potential for a third phase of development at the Direction for Growth site has not been subject to any robust testing in relation to its suitability or deliverability, and so there is no certainty that it is capable of making any contribution to the delivery of housing in the Borough. Moreover, the Council has stated that, if a third phase were to be contemplated, it could only be achieved through a review of the Plan. In a situation where the Council needed to identify additional sites because its allocations were not delivering, relying on a review of the Plan to rectify the</p>	<p>The South East Leicestershire Transport Study assessed the highway and transport network within the Borough up to 2031 taking account of the land identified and allocated within the Local Plan. The assessment concluded that the levels of development proposed could be accommodated, however highway mitigation works would be required. Any development over and above that proposed within the Plan is likely to have significant further impacts on the local highway network.</p> <p>As suggested by the representation, in addition to the Council meeting its own OAN for housing, the Local Plan (at paragraph 4.2.11) illustrates a 'buffer' of new additional homes up to 2031. This buffer would negate any potential delivery issues on allocated sites, as well as help fulfil a proportion of Leicester City's declared unmet need. It should be noted that Leicester City is the only authority within the Leicester and Leicestershire HMA to declare an unmet housing need. All other authorities can (at least) meet their own identified need.</p> <p>The 'buffer' identified within the Plan of approximately 400 new homes would be subject to appropriate testing, in particular highway and transport infrastructure capacity, should it be in addition to the Plan period target of 2,960. The 'buffer' identified would only come forward should an allocated site fail to deliver, therefore requiring buffer sites to be released. Due to the buffer release being in place of an existing allocation (which has been tested), the impact on the highway and transport infrastructure capacity would not be worsened, as its cumulative impact has in essence been tested. Through the Pre-Submission Local Plan Consultation, the Council has been made aware of the potential for 200 further new homes at the Phase 3</p>
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		<p>shortfall in delivery would only add further delay. For these reasons, we conclude that no reliance can be placed on a potential third phase at the Wigston Direction for Growth site in order to provide a 'buffer' against under-delivery. If such a review were to take place then this should in any event consider all potential development options, not just the suggested third phase to the Direction for Growth. The site promoted by Jelson / Davidsons is in a broadly similar location to the Direction for Growth and could equally form an effective third phase, but potentially with greater benefits. These need to be properly tested in order that the most appropriate strategy can be identified. As things stand, we conclude that the Council is seeking to delay undertaking such an assessment now, but at the same time is pre-determining what the solution to under-delivery of the proposed allocations might be.</p> <p>When taken with the uncertainty over the delivery of 40 dwellings at Kilby Bridge, we conclude that the only source of alternative development which the Council can rely on, if its committed sites or proposed allocations fail to deliver, is windfall development. The Council has assumed that 70 windfall dwellings might be delivered over the plan period, equating to just 2.3% of the proposed housing target.</p> <p>A buffer which comprises such a small proportion of the Borough's housing need does not, in our view, represent sufficient flexibility that would enable the Council to respond to "<i>rapid change</i>" as required by Paragraph 14 of the NPPF. Again, this leads us to conclude that the Pre-Submission version of the Plan is not positively prepared.</p>	<p>of the Wigston Direction for Growth Area. As suggested earlier, due to the constrained and congested nature of the Borough's highway network <u>any</u> development over and above that allocated within the Local Plan (up to 2031) would be subject to highway testing that took account of cumulative impact and not just site specific impact.</p> <p>In addition, the Council is confident that the levels of development proposed will come forward within the Plan period as expected and illustrated within the Local Plan housing trajectory. As with any trajectory, the further into the future it forecasts, the (potentially) less reliable it becomes. In the short to medium term the Council are confident that the trajectory is accurate and robust and the 'buffer' is unlikely to be required. Up to 2031, as illustrated, the Borough area can just provide (from a transport and highway network capacity point of view) the required housing need. Post 2031, the Strategic Growth Plan has the potential to 'unlock' further land within the Borough through its proposed provision of large scale highway and transport infrastructure that would relieve the pressures on the transport and highway network within the Leicester Principal Urban Area, particularly Leicester City and the Borough of Oadby and Wigston.</p> <p>The Council would like to note, that although the two sites are in similar locations, there is a fundamental difference relating to site access and site testing. The Wigston Direction for Growth Area has been subject to cumulative transport testing and importantly has two main site access points directly onto Newton Lane to the north and the main arterial route (A Road) of Welford Road (A5199) (significant to Leicester and Leicestershire also) to the south west. The land to the North of Newton Lane does not have a main site access</p>
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			point that is directly onto a main arterial route, for example a route classified as an A Road or B Road. The site also did not form part of the South East Leicestershire Transport Study, therefore has not been taken account of from a cumulative transport / highway testing perspective. It should also be highlighted that part of the land promoted through the representation is situated on designated green wedge.
17.12.17	GVA (Land North of Newton Lane)	<p>At Paragraph 4.2.11 of the Pre-Submission version of the Plan, the Council states that its proposed buffer of circa 400 dwellings could "<i>help fulfil a small proportion of Leicester City's declared unmet need</i>", as well as off-setting any under-delivery or delay on its own allocated sites (see below for further commentary on Leicester's unmet need). In our view, this is unreasonable because:-</p> <p>a) for the reasons we have explained, the Council's buffer is, in our view, only approximately 70 dwellings rather than 400;</p> <p>b) it potentially pre-judges the outcomes of any work to determine how the shortfall arising from Leicester City is going to distributed elsewhere within the housing market area; and</p> <p>c) we don't believe that any 'buffer' should perform a dual function – it is in our view necessary for the Council to build in sufficient flexibility in relation to its own housing needs, and then make, separately, an allowance for meeting its share of the shortfall in Leicester City, once there is clarity about the number of dwellings from Leicester which may have to be accommodated in Oadby and Wigston.</p> <p>Representation</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>Upon the publication of the HEDNA in January 2017, the Council has had to work extremely proactively and positively to meet its illustrated housing OAN. The housing OAN illustrated within the HEDNA (and subsequent Plan target) is a huge 'step change' for the Council. From planning for 90 dwellings per year, the Council has had to plan for 148 dwellings per year to fulfil its own OAN.</p> <p>The huge change / shift in housing requirement has meant that the Council has had to identify and allocate over 60 per cent more land then it would have been required to identify should the requirement have remained at 90 dwellings per year. The principal constraint for the Council, has always been its highway and transport infrastructure and network. The highway network within the Borough is currently severely congested along both its routes and its junctions; the levels of growth identified and allocated only exacerbate this further.</p> <p>The South East Leicestershire Transport Study assessed the highway and transport network within the Borough up to 2031 taking account of the land identified and allocated within the Local Plan. The assessment concluded that the levels of development proposed</p>

		<p>Table 1, Paragraphs 4.2.4 to 4.2.12 and Policy 2 fail to identify any flexibility in the delivery of housing to respond to rapid change. There are therefore inconsistent with the NPPF and are not justified, because the strategy is not appropriate. It is also apparent that the contents of Table 1 are incorrect, so that the Council does not actually have sufficient supply to meet its needs up to 2031, and so the Plan is, as a consequence, not positively prepared. These matters lead to a conclusion that the Plan is unsound.</p>	<p>could be accommodated, however highway mitigation works would be required. Any development over and above that proposed within the Plan is likely to have significant further impacts on the local highway network.</p> <p>As suggested by the representation, in addition to the Council meeting its own OAN for housing, the Local Plan (at paragraph 4.2.11) illustrates a 'buffer' of new additional homes up to 2031. This buffer would negate any potential delivery issues on allocated sites, as well as help fulfil a proportion of Leicester City's declared unmet need. It should be noted that Leicester City is the only authority within the Leicester and Leicestershire HMA to declare an unmet housing need. All other authorities can (at least) meet their own identified need.</p> <p>The 'buffer' identified within the Plan of approximately 400 new homes would be subject to appropriate testing, in particular highway and transport infrastructure capacity. Through the Pre-Submission Local Plan Consultation, the Council has been made aware of the potential for 200 further new homes at the Phase 3 of the Wigston Direction for Growth Area. As suggested earlier, due to the constrained and congested nature of the Borough's highway network <u>any</u> development over and above that allocated within the Local Plan (up to 2031) would be subject to highway testing that took account of cumulative impact and not just site specific impact.</p> <p>In addition, the Council is confident that the levels of development proposed will come forward within the Plan period as expected and illustrated within the Local Plan housing trajectory. As with any trajectory, the further into the future it forecasts, the (potentially) less</p>
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			<p>reliable it becomes. In the short to medium term the Council are confident that the trajectory is accurate and robust and the 'buffer' is unlikely to be required. Up to 2031, as illustrated, the Borough area can just provide (from a transport and highway network capacity point of view) the required housing need. Post 2031, the Strategic Growth Plan has the potential to 'unlock' further land within the Borough through its proposed provision of large scale highway and transport infrastructure that would relieve the pressures on the transport and highway network within the Leicester Principal Urban Area, particularly Leicester City and the Borough of Oadby and Wigston.</p>
17.12.17	GVA (Land North of Newton Lane)	<p>We have commented in Section 3 on the Council's proposed plan period, which extends only until 2031. We have also noted that the emerging Strategic Growth Plan, and the Joint Statement of Co-Operation prepared by the Leicestershire authorities, both state that Oadby and Wigston Borough Council has "<i>declared</i>" that it cannot meet its objectively-assessed need up to 2036. In our view, this only serves to highlight the fragility of the Council's approach to housing delivery in the emerging Plan; if it believes it cannot meet its objectively-assessed needs by 2036, which only exceeds the need up to 2031 by 915 dwellings, then this points to a conclusion that there is very limited flexibility for other sites to come forward if the proposed allocations are delayed, or under-deliver.</p> <p>The inflexibility of the Plan in its current form is highlighted further still in the light of ongoing issues around the ability of Leicester City Council to meet its own objectively-assessed housing needs. The HEDNA concluded that Leicester's housing need is 1,692 dwellings per annum (in a plan period to 2031) or 1,668 dwellings per annum if a plan period were</p>	<p>Comment noted.</p> <p>Response to these representations is set out in the Local Plan Spatial Strategy Submission document that the Council has produced for Local Plan Submission.</p> <p>In addition, the Council will continue to work closely with all authorities within the Leicester and Leicestershire Housing Market Area, not only in providing the required number of homes up to 2031, but post 2031 in line with the Strategic Growth plan. In Local Plan paragraphs 1.5.6 to 1.5.7 the Council has committed to a review of the Local Plan no later than 5 year from adoption (consistent with national policy and guidance) and has also set out what would trigger an earlier review. The Council considers that the commitment shown in paragraphs 1.5.6 to 1.5.7 illustrate the Council's intentions in an appropriate manner. However, the Council would not object if the wording was required to be set out within a new Local Plan policy.</p>

		<p>extended to 2036. These equate to totals of 33,840 dwellings up to 2031 and 41,700 dwellings up to 2036.</p> <p>In a Joint Statement of Co-Operation prepared by the Leicestershire authorities, 'theoretical housing capacities' for each local authority were set out, alongside the HEDNA need figures. For Leicester City Council, the theoretical capacity given is 26,230. As such, it appears that there is a potential for an unmet need of 7,610 dwellings in Leicester to arise at 2031, rising to 15,470 by 2036.</p> <p>Oadby and Wigston Borough Council has stated, at Paragraph 4.2.5 of the Pre-Submission version of the Plan, that "<i>it is aware that the City of Leicester has declared an unmet need and will need help from other HMA partners to deliver its unmet need up to 2031</i>". In other words, the Council has expressly recognised that it will likely have to accommodate some of the unmet need from its neighbouring authority. However, as we have explained above, the Council has only proposed allocations sufficient to meet its own objectively assessed needs, and no more. There is no allowance made in proposed Policy 2, or Table 1, for potential development required to contribute to Leicester City Council's needs.</p> <p>The Council does say, though, at Paragraphs 1.5.6 and 1.5.7, that it will undertake a review of the Plan where one of three triggers is engaged, or, and in any event, no later than five years from the date of the adoption of the Plan. The first trigger for a review of the Plan is where annual monitoring shows that the Plan is not delivering against its targets.</p> <p>The third trigger is where components of the Strategic Growth Plan are delivered earlier than expected.</p>	
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		<p>The second trigger is where, “a local authority within the Leicester and Leicestershire HMA has an evidenced unmet need, which cannot be met by the other local authorities within the Leicester and Leicestershire HMA and / or within the flexibility allowed within this Plan. In this instance, a review will begin with the preparation of evidence to establish whether the unmet need can be met within the Borough”.</p> <p>We are concerned that, in the second trigger, the Council is attempting to require that a review is only, commenced where: a) an authority cannot meet its objectively-assessed need; and b) none of the other authorities in the HMA are able to accommodate that need. In other words, it appears that the Council might be seeking to establish a sequential approach whereby it will be necessary for other authorities in the HMA to demonstrate that they cannot accommodate another authority’s unmet need, before the Council begins a review of the Plan. In our view, this is inappropriate; the NPPF requires authorities to work collaboratively on such cross-boundary issues. Therefore, it is inconsistent with national policy for the Council to suggest that the onus should be on other authorities in the HMA to meet any shortfalls elsewhere before it considers undertaking a review of the Plan.</p> <p>On a more general point, and without prejudice to the above, we consider that it is a weakness of the Plan that the undertaking to carry out a review is not enshrined into a policy. We are of the view that the obligation to undertake a review should be built into a policy, if the Plan is to be progressed in advance of clarity on how the shortfall in Leicester City is going to be addressed.</p>	
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		<p>In relation to the third trigger, we also note that the Strategic Growth Plan contemplates significant potential for growth as a spin-off from an upgraded A46 corridor. The Growth Plan states that the 'expressways' which form part of those infrastructure improvements will be delivered by "the early 2030s". Figure 5 of the Strategic Growth Plan shows that the 'growth corridor' which will be created by enhanced infrastructure, and which might accommodate "about 40,000 new homes and additional new jobs" washes over much of Oadby and Wigston. In other words, it is apparent that, in the early 2030s, the Borough will be located within an area of strategic growth. Whilst the Pre-Submission Local Plan notes the intention for infrastructure improvements, it is of the view that there is "<i>insufficient certainty</i>" around the delivery of infrastructure for the growth corridor to influence the spatial strategy in the Plan. However, the Council proposes that one of its triggers for undertaking a review will be delivery of the new infrastructure in the growth corridor "<i>at a faster rate than is currently anticipated</i>".</p> <p>Because of the potentially significant implications of the growth corridor being delivered earlier than expected, we believe that this further emphasises the need for the review mechanism to be enshrined into policy.</p> <p>Representation</p> <p><i>As a consequence of these matters, we reiterate that Paragraphs 4.2.5 and 4.2.6, and Policy 2, are not consistent with national policy because they fail to demonstrate flexibility to respond to rapid change. There are also not positively prepared because they do not seek to meet unmet requirements arising elsewhere in the</i></p>	
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		<p><i>housing market area. They are not justified because they do not propose an appropriate strategy. They are also not effective because they are not based on effective working on cross-boundary strategic priorities.</i></p> <p><i>Furthermore, Paragraphs 1.5.6 and 1.5.7 should form a policy, rather than a monitoring trigger being left to supporting text. Until such a change is made, we conclude that the Plan is not positively prepared.</i></p>	
17.12.17	GVA (Land North of Newton Lane)	<p>In order to achieve a much greater degree of flexibility in the Plan, we conclude that the Council must allocate additional sites to deliver new residential development. With that in mind, the land which Jelson is promoting in conjunction with Davidsons is deliverable and has the potential to provide up to an additional 600 dwellings up to 2031. Alternatively, if the Inspector concludes that the Council should adopt a plan period up to 2036, and should look to meet its objectively-assessed need (155 dwellings per annum / 3,875 dwellings in total) up to that point in time, then the land promoted by Jelson could make a significant contribution towards meeting that need.</p> <p>We have explained in Section 2 that Golby and Luck have prepared a Landscape Framework plan, which demonstrates how the site could be delivered without adversely affecting the separation between Oadby and Wigston, and with appropriate mitigation to retain a sensitive relationship between the extended urban edge and the countryside which lies beyond. In Section 6, we go on to further explain the merits of the site as a location for residential development.</p> <p>Representation</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>Upon the publication of the HEDNA in January 2017, the Council has had to work extremely proactively and positively to meet its illustrated housing OAN. The housing OAN illustrated within the HEDNA (and subsequent Plan target) is a huge 'step change' for the Council. From planning for 90 dwellings per year, the Council has had to plan for 148 dwellings per year to fulfil its own OAN.</p> <p>The huge change / shift in housing requirement has meant that the Council has had to identify and allocate over 60 per cent more land than it would have been required to identify should the requirement have remained at 90 dwellings per year. The principal constraint for the Council, has always been its highway and transport infrastructure and network. The highway network within the Borough is currently severely congested along both its routes and its junctions; the levels of growth identified and allocated only exacerbate this further.</p> <p>The South East Leicestershire Transport Study assessed the highway and transport network within the Borough</p>

		<p><i>In order to remedy the matters we have identified above in relation to the soundness of the Plan, we conclude that the Council must revisit its spatial strategy and ensure that it has allocated sufficient sites to provide flexibility in its approach to the delivery of housing. Accordingly, we conclude that the land which is being promoted by Jelson in conjunction with Davidsons provides an opportunity to allocate additional land for this purpose.</i></p>	<p>up to 2031 taking account of the land identified and allocated within the Local Plan. The assessment concluded that the levels of development proposed could be accommodated, however highway mitigation works would be required. Any development over and above that proposed within the Plan is likely to have significant further impacts on the local highway network. Therefore any significant developments over and above this planned growth would require further assessment. This assessment should be done through the process of preparing subsequent Local Plans which extend beyond 2031 and with reference to the Leicester and Leicestershire Strategic Growth Plan which contains proposals that are likely to relieve existing pressures on the Local Highway Network across the south east Leicester Principal Urban Area (e.g. the A46 Expressway).</p> <p>In December 2017, the Council approved the Joint Statement of Co-operation Relating to Objectively Assessed Need for Housing (November 2017). The joint statement sets out that up to 2031 the local authorities within the Leicester and Leicestershire Housing Market Area have sufficient capacity to meet the Leicester and Leicestershire Housing Market Area OAN for housing. The statement sets out that the theoretical total housing capacity of the Leicester and Leicestershire Housing Market Area exceeded the OAN for housing by over 100,000 new homes. In addition, all local authorities within the Leicester and Leicestershire HMA have been working together on the production of the Leicester and Leicestershire Strategic Growth Plan. The relationship of the Strategic Growth Plan to Local Plans is set out at paragraph 1.5.2 of the Local Plan, which states '<i>although the Strategic Growth Plan deals with the time period up to 2050, it treats the period's pre 2031 and post 2031 very differently. Pre 2031, the</i></p>
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			<p><i>housing and employment Objectively Assessed Needs for the Leicester and Leicestershire HMA, set out within the HEDNA, will be delivered through each of the local authorities individual Local Plan's. The Strategic Growth Plan therefore focuses on the period post 2031, for which it identifies a 'notional housing need'. It recognises that for this period there are no reliable estimates of population growth or household change, thus it estimates future housing needs by projecting forwards the annual figures set out within the HEDNA'.</i></p> <p>The Council will continue to work closely with all authorities within the Leicester and Leicestershire Housing Market Area, not only in providing the required number of homes up to 2031, but post 2031 in line with the Strategic Growth plan. In Local Plan paragraphs 1.5.6 to 1.5.7 the Council has committed to a review of the Local Plan no later than 5 year from adoption (consistent with national policy and guidance) and has also set out what would trigger an earlier review. The Council considers that the commitment shown in paragraphs 1.5.6 to 1.5.7 illustrate the Council's intentions in an appropriate manner. However, the Council would not object if the wording was required to be set out within a new Local Plan policy.</p>
17.12.17	GVA (Land North of Newton Lane)	<p>Green Wedges</p> <p>On Pages 23 to 25 of the Pre-Submission document, the Council sets out a number of proposed 'Spatial Objectives'. The thirteenth Spatial Objective relates to Green Wedges and land in the Countryside. It states that the Council will seek to "<i>protect</i>" and "<i>enhance</i>" Green Wedges by "<i>limiting development to appropriate uses only, as well as safeguarding... other open spaces</i></p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The purpose of the Council's Green Wedge Review is to assess the boundaries of the existing green wedge designations, as defined on Council's Saved Local Plan Proposals Map and the Council's Adopted Policies Map. The review took into account the Broad Location for Growth Areas identified within the Strategic Housing</p>

		<p><i>for sport and other forms of recreation</i>".</p> <p>Proposed Policy 42 states that the Council will "<i>seek to retain</i>" land in Green Wedges "<i>as open and undeveloped</i>", and that only development associated with five particular types of uses will be permitted within designated areas.</p> <p>The Council has proposed some release of land from the Green Wedge, to enable the allocation of the Stoughton Grange Direction for Growth. The Council also proposes the formation of a new area of Green Wedge between Oadby and Wigston, and which wraps around the southern edge of the proposed Cottage Farm Direction for Growth. A small part of the proposed new Green Wedge falls within the proposed development area (hatched red on the plan at Appendix II) which is being promoted by Jelson, in conjunction with Davidsons.</p> <p>The Council states that its approach to Green Wedge policy is justified by a Green Wedge review, which forms part of the evidence base that underpins the draft Local Plan. It appears that the Green Wedge review has been carried out by the Council itself, rather than by technical consultants on the Council's behalf.</p> <p>In short, the Review breaks each of the Green Wedges into 'sub-areas' and briefly describes the characteristics of each, with reference to their land use, boundaries, topography, rights of way, ecology and development pressure. It then goes on to assess the performance of each of the Green Wedges against the four criteria for Green Wedges (as set out in proposed Policy 42).</p> <p>In relation to the Oadby and Wigston Green Wedge (in which the land which Jelson is promoting is located (in</p>	<p>Land Availability Assessment and the options for greenfield release sites identified within the Council's Preferred Options Local Plan consultation document. Each of the existing green wedges was assessed against the functions set out in the Leicester and Leicestershire Green Wedge Review Joint Methodology to see whether or not the current designated boundaries should be kept the same or amended. As stated within the review document, for the purpose of the review document the Oadby and Wigston Green Wedge was assessed at an overall 'macro' scale, however to ensure a good level of detail the Oadby and Wigston Green Wedge was split down into five sub areas to aid the review process.</p> <p>The review document assessed the two green wedges of the Borough against the four objectives illustrated below:</p> <ul style="list-style-type: none"> • Prevent the merging of settlements, • Guide development form, • Provide a 'green lung' between the urban area and the countryside, • Act as a recreational resource. <p>The conclusions for the Oadby and Wigston Green Wedge suggest that <i>'the majority of the green wedge is relatively wide and forms an effective and valuable separation of the two settlements of Wigston and Oadby. Throughout the length of the green wedge there are minimal pinch points, the narrowest point being approximately 145 metres between Wigston and Oadby. Such 'pinch points' should not be increased through removal of areas of green wedge in the future. The southern area of the green wedge, where it abuts the Borough's countryside designation is also important as it reduces the likelihood of 'wrap' round built development that would essentially join the two</i></p>
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		<p>part)), the Review concludes that the narrowest point between the urban edges of Oadby and Wigston is 145 metres. It also states that the southern part of the wedge (again, in which the land which Jelson is promoting is located) "<i>is important as it reduces the likelihood of 'wrap' round built development that would essentially join the two settlements</i>".</p> <p>As we have explained in earlier sections, the separation distance between the land which Jelson is promoting, and the urban edge of Oadby, is more than double 145 metres, and so well in excess of the existing narrowest point. Moreover, the Landscape Framework Plan prepared by Golby and Luck (Appendix III) shows how development on the site could be arranged without materially reducing the separation between Oadby and Wigston, or leading to any perception of coalescence between the two.</p> <p>In our view, this exposes a weakness in the evidence base prepared by the Council. Although the Review purports to examine the performance of the Green Wedge across specific sub-areas, it fails, at a micro level, to test the impacts on the performance of the Green Wedge if development was to be brought forward within it. In our view, the Landscape Framework Plan prepared by Golby and Luck demonstrates that part of the Green Wedge could accommodate development, without harming the purposes of the designation.</p> <p>Having undertaken its analysis, the Council goes on to set out three recommendations in relation to the Oadby and Wigston Green Wedge. The first recommendation is that "<i>the boundaries are not amended to include or exclude any areas of the current green wedge [sic]</i>". Although the wording perhaps</p>	<p><i>settlements. Having this area of green wedge is also important as it allows people that reside in the urban areas, particularly the area near to Beauchamp College in Oadby, access into the countryside</i>'.</p> <p>In addition the document suggests that throughout the Oadby and Wigston Green Wedge, the urban edge / green wedge boundary is visually strong and well defined. There is no 'blurring' of the lines or urban fringe, it is very much urban one side, open green wedge (and its associated infrastructure) the other.</p> <p>The review document goes on to suggest recommendations for the Green Wedge, of which the extension south in is one. The extension of the Oadby and Wigston Green Wedge has been allocated by the Council as it considers that it will guide development form in future years by preventing any future coalescence of the two settlements of Wigston and Oadby. It will also act as a recreational resource and provide a 'green lung' between the urban area and the countryside.</p> <p>It should be noted that the Council would not preclude development of green wedge areas, however any development proposals would need to comply with Local Plan Policy 42 Green Wedges (or current Core Strategy Policy 6 Green Wedges).</p>
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		<p>lacks precision, our reading of this recommendation is that the boundaries of the Green Wedge should be preserved as they are. However, the second recommendation is to include land at Lucas Marsh Nature Reserve in the wedge. The third recommendation is that land to the south of the Cottage Farm Direction for Growth should be brought into the Green Wedge.</p> <p>On the face of it, recommendations two and three are in conflict with recommendation one, which states that the boundaries of the Green Wedge should not be amended. Notwithstanding that we disagree with a conclusion that there should be no amendments to the boundaries of the Green Wedge, the apparent conflict between the recommendations of the Review further highlight, in our view, that it does not provide robust evidence for the purpose of plan-making.</p> <p>Because the Review fails to undertake any detailed analysis of the Green Wedge at a micro-level, it fails, in our view, to fully justify the proposal to extend to the Green Wedge to the south of Cottage Farm, or to justify the boundaries of that extension. The Review states that an extension to the wedge is needed to “<i>prevent coalescence</i>” of the settlements following the development of Cottage Farm, and similar wording appears at Paragraph 7.5.11 of the Pre-Submission document when referring to the extension of the Green Wedge.</p> <p>However, neither the Review, nor the Plan, explain how the extension to the Green Wedge would contribute to the other purposes of the designated area, or why the boundary of that extension needs to include part of the land which Jelson is promoting in order to achieve the stated objective of preventing coalescence. Again, this</p>	
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		<p>leads us to conclude that the evidence base prepared by the Council is not robust.</p> <p>Finally, the Green Wedge Review also addresses the Oadby, Thurnby and Stoughton Green Wedge, in which the Stoughton Grange Direction for Growth site is located. The Review carries out the same analysis across a number of sub-areas. It concludes that the Green Wedge satisfies all of the criteria for including land within the designated area. Again, the Council makes three recommendations, the first of which is to leave the boundaries of the wedge as they are. The second recommendation is to remove a small amount of existing built development from the wedge. The third recommendation is to release a significant amount of land from the wedge to facilitate delivery of the Stoughton Grange Direction for Growth. The only reason given for that recommendation is that it "<i>would not allow for settlement coalescence</i>".</p> <p>As we have explained above, it is not appropriate for the Council to make recommendations which are, on the face of it, in conflict with each other, particularly where they significantly vary in outcome. More significantly, however, is that the Review fails to provide any analysis to justify the release of a significant swathe of the wedge to facilitate development at Stoughton Grange. For the same reason that we concluded that the analysis is not robust in relation to the Oadby and Wigston Green Wedge, we reach the same view on the Oadby, Thurnby and Stoughton Green Wedge; it is unreasonable to justify a significant change to the Green Wedge in a single sentence. This reaffirms, in our view, that the Green Wedge Review does not provide robust evidence for the retention, extension, or removal of land in the Green Wedge that is proposed</p>	
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		<p>by the Council.</p> <p>Instead it would appear that the Green Wedge Review does nothing more than reflect the Council's predetermined allocation strategy rather than in any way informing the location of planned growth.</p> <p>Consequently, we conclude that the Proposals Map (insofar as it relates to amended Green Wedge boundaries), and therefore the Plan, are unsound, because they are not based on robust evidence base.</p> <p>This conclusion is significant in the context of our analysis in Section 4 in relation to housing need and supply. Given that we think the Council has failed to demonstrate any flexibility in relation to the delivery of housing, we conclude that it is imperative that it undertakes, without delay, a robust, comprehensive analysis of its Green Wedges in order to fully test the potential for releases of land from the wedges and their allocation so that the Council is able to demonstrate a flexible approach to housing delivery over the plan period.</p> <p>Representation</p> <p><i>As a consequence of all of the above, we conclude that Policies 18, 21 (insofar as they relate to redrawing Green Wedge boundaries) and 42 of the Plan, and their supporting text, are not justified, because they are not based on proportionate evidence.</i></p> <p><i>We conclude that the Council must revise its evidence base in relation to the Green Wedge and undertake a thorough, robust analysis of the wedges at a detailed, micro level, in order to</i></p>	
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		<i>fully determine the extent to which elements of the designated areas could be released and allocated for new housing.</i>	
17.12.17	GVA (Land North of Newton Lane)	<p>Merits of Development</p> <p>We have set out in Sections 3, 4 and 5 our representations on the soundness of the Pre-Submission version of the Plan in respect of a number of issues. In this Section, we summarise the planning merits of the land which Jelson is promoting in conjunction with Davidsons, and then review the Sustainability Appraisal which has been prepared as part of the evidence base for the Plan.</p> <p>We have explained in Section 2 that the site is located in Flood Zone 1 and that there are no statutorily listed buildings, or other designated heritage assets, within the site or in close proximity to it. Furthermore, we have explained that the site immediately adjoins the existing urban area of Wigston. There are existing bus stops on Meadow Way and Guthlaxton Way, served by routes that provide public transport links into Wigston town centre (the principal centre of the Borough) and also Leicester City Centre. In other words, there is an existing public transport system in place which can facilitate trips to shops, services and employment opportunities by means other than the private car.</p> <p>Therefore, and as a matter of principle, we conclude that the site occupies a sustainable location adjacent to the existing urban area.</p> <p>As we have noted elsewhere, Golby and Luck have prepared a Landscape Framework Plan, which demonstrates how development parcels on the site might be arranged in order to prevent any coalescence between Oadby and Wigston and so avoid any conflict</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The Sustainability Appraisal undertaken for the Local Plan is one of its many important pieces of evidence base. When assessing the sites for allocation within the Local Plan, the Council considers many aspects, not just the conclusions of the Sustainability Appraisal.</p> <p>Although the Borough area, being constrained and compact in size, having severe transport and highway infrastructure issues, specifically congestion along its routes and at its junctions, in order to allocate sufficient land to accommodate the required levels of growth up to 2031, the Council considered it necessary to identify three Direction for Growth Areas on greenfield land. The three Direction for Growth Areas allocated within the Plan were considered to have the least negative impact on the Borough's highway and transport infrastructure network, and were considered the most appropriate locations in relation to existing urban development form, the Leicester Principal Urban Area and access onto main arterial transport routes (A Roads and B Roads).</p> <p>The Wigston Direction for Growth Area (Phase 1) was first identified through the Council's Core Strategy in 2010, and comprised the Council's single greenfield release site of 450 new homes. Subsequent to the Core Strategy adoption, the land promoters for Phase 1 publically consulted on a Masterplan scheme that sought further development of the area (up to 1000 new homes including the 450 of Phase 2). It was this Masterplan that formed the basis of the Phase 2</p>

		<p>with the purposes of the Green Wedge. That plan also shows that development could be brought forward alongside new landscaping, and the enhancement of existing features, in order to provide an appropriate form of development on the eastern edge of Wigston that would extend the urban area in a logical fashion, whilst continuing to provide an appropriate green 'edge' between built development and the countryside to the east.</p> <p>The Council has commissioned a Sustainability Appraisal, which has been prepared by Land Use Consultants to support the Pre-Submission version of the Plan. The Appraisal carries out assessments of both those sites which are proposed for allocation in the Plan, and those which have been submitted earlier in the planmaking process but which the Council has decided not to propose for allocation (and which includes the land which Jelson is promoting in conjunction with Davidsons).</p> <p>Chapter 5, supported by Appendix 5, of the Appraisal sets out the scoring against prescribed sustainability objectives for all residential development options which have been submitted through the plan-making process, including those sites which have been allocated. The land promoted by Jelson and Davidsons (Site OWBC 43) scores very positively in relation to housing (objective 1), health (objective 2), community facilities (objective 3), education (objective 16), employment opportunities (objective 17) and public transport (objective 22). In our view, this reflects that there are a number of factors which point to a conclusion that the site occupies a sustainable location for residential development.</p> <p>The Appraisal also concludes that the site is likely to</p>	<p>Wigston Direction for Growth Area that is allocated within the Council's Local Plan. The Wigston Direction for Growth Area has been subject to cumulative transport testing and importantly has two main site access points directly onto, Newton Lane to the north and the main arterial route (A Road) of Welford Road (A5199) (significant to Leicester and Leicestershire also) to the south west. In addition, 5 hectares of employment land has been allocated at the Wigston Direction for Growth area, which contributes towards its appropriateness and sustainability. As well as residential and employment provision, the scale of development proposed at the Wigston Direction for Growth Area provides essential community facility provision, including a new local centre, a new primary school, and a new community facility building.</p> <p>The Cottage Farm Direction for Growth Area allocated within the Local Plan, similar to the Wigston Direction for Growth Area, was a site of extant development (Phase 1). The Local Plan allocates further land comprising Phase 2 development. The Cottage Farm Direction for Growth Areas direct access onto one of the Borough's (and Leicester and Leicestershire's) main arterial routes, the A6 (A Road) was considered a fundamental element, alongside its extant Phase 1 development.</p> <p>The Stoughton Grange Direction for Growth Area does not comprise of extant development like the other two Direction for Growth Areas, however does have two main site access points directly onto the main arterial routes (B Road) of Stoughton Road (B582) to the east and Gartree Road (B582) to the north.</p> <p>In addition, it should be noted that the three Direction for Growth Areas have formed part of the Local Plan</p>
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		<p>have a significant negative effect on the historic environment, biodiversity and landscape. The more detailed assessment of the site in Appendix 5 states that the negative effect is likely to arise from two areas of archaeological potential within the site. However, the Appraisal notes that “the negative effect is uncertain given that it may be possible to mitigate negative impacts on areas which are likely to contain buried archaeology”. We agree with this view, and so it follows that it is feasible that the impacts could be reduced from the ‘significant negative’ set out in the Appraisal.</p> <p>Again the significant negative score for biodiversity arises, it appears, from a candidate Local Wildlife Site being located within the site. However, the Appraisal also notes that a scheme could be designed to mitigate any impacts on habitats. We agree, and conclude that there is potential for the impacts on this objective to be less than the significant negative identified by the Council’s consultants.</p> <p>Finally, the significant negative score in relation to landscape as a consequence of the site comprising greenfield land. Again, the Council’s consultants note that specific impacts will be known once a scheme for the site has been prepared. Whilst we agree, we do refer back to the Golby and Luck Landscape Framework Plan, which shows potential for comprehensive new landscaping, and the enhancement of existing features, in order to soften the edge of the development and respect its sensitive relationship with the countryside to the east. Therefore, while development on the site will have an impact on the landscape, we conclude that this could be mitigated, such that the score ascribed to the site by the Council’s consultants could be reduced as a consequence.</p>	<p>throughout its process, as well as being illustrated as Broad Locations (consistent with paragraph 47 of the NPPF) within the Council’s SHLAA for a number of years. Prior to the production of the Pre-Submission version of the Council’s Local Plan, the Preferred Options version of the Local Plan highlighted Land between Stoughton Road and Gartree Road, Oadby (now the allocated Stoughton Grange Direction for Growth Area) and Land at Cottage Farm, Oadby (now the allocated Cottage Farm Direction for Growth Area) as options for Greenfield Release sites, should the Borough’s housing need require a need to do so.</p> <p>In reference to the land North of Newton Lane, as submitted by GVA, it is important to highlight that the site does not have a main site access point that is directly onto a main arterial route, for example a route classified as an A Road or B Road. It should also be noted that the site did not form part of the South East Leicestershire Transport Study, (nor has any cumulative study been submitted), therefore has not been taken account of from a cumulative transport / highway testing perspective. All three Direction for Growth Areas allocated within the Local Plan have been subject to cumulative transport / highway testing and were taken account of in the South East Leicestershire Transport Study.</p>
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		<p>It is worth also noting how Site OWBC 43 scores against those sites which have been proposed for allocation in the Plan. When compared to Cottage Farm Direction for Growth (OWBC 44), we note that Jelson’s site is likely to have a significant positive effect in relation to community facilities (objective 3) whereas Cottage Farm is expected to have only a minor positive effect. In relation to landscaping, OWBC 43 is said to have a significant negative impact (although as we have said above, with reference to the Golby and Luck plan this could be reduced), whereas Cottage Farm is said to have a mix of significant negative and minor positive impacts. The detailed analysis in Appendix 5 of the Appraisal states that the ‘minor positive’ impact of the Cottage Farm site will arise from the provision of open space on the site. Given that Golby and Luck have shown open space and landscaping on the Landscape Framework Plan for OWBC 43, we conclude that both sites should at least score equally in relation to this objective, rather than Cottage Farm scoring better than Jelson’s site.</p> <p>That being so, we note that the two sites score equally in all other regards. In our view, this means that OWBC 43 scores, at least, equally, if not better than OWBC 44 overall.</p> <p>In relation to the Wigston Direction for Growth Phase 2 site (OWBC 17a), we note that this scores worse in relation to health than OWBC 43. OWBC 17a is projected to have a mix of minor positive and negative impacts on health, whereas OWBC 43 is projected to have significant positive and only minor negative impacts. Furthermore, whilst both sites are projected to have significant positive impacts on community facilities, there is a question mark attributed to Site OWBC 17a, which indicated uncertainty about the</p>	
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		<p>potential for those impacts to be delivered.</p> <p>Otherwise, the two sites score equally. Consequently, we conclude, based on the Sustainability Appraisal, that OWBC 43 scores better than OWBC 17a.</p> <p>Finally, we compare the score of OWBC 43 to the Stoughton Grange Direction for Growth site (OWBC 24 and OWBC 28). OWBC 43 scores better than OWBC 24 in the following areas:-</p> <ul style="list-style-type: none"> • community facilities; • education; and • access. <p>OWBC 43 scores better than OWBC 28 in the following areas:-</p> <ul style="list-style-type: none"> • health; • community facilities; • education; • employment opportunities; • access; and • public transport. <p>In a number of cases, the differences are significant. For example, OWBC 43 is projected to have significant positive impacts on community facilities, whereas OWBC 24 is projected to have only a combination of minor positive and minor negative impacts, and OWBC is projected to have a combination of minor positive and significant negative impacts. Similarly, OWBC 43 is forecast to have significant positive impacts on education, but OWBC 24 and OWBC are forecast to have only minor negative impacts. Furthermore, OWBC is projected to have minor positive impacts on employment opportunities and negligible impacts on access. OWBC 28 is projected to have significant</p>	
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		<p>negative impacts on both.</p> <p>This conclusion is expressed despite the outcome of the Sustainability Appraisal. Furthermore, and as we have explained elsewhere in this Report, the site could also be accessed via Denbydale, which we expect could serve at least part of the site. The Council's conclusion on this point is therefore incorrect.</p> <p>Most significant, though, is the Council's assertion that the location of the site in the countryside means development would not be sustainable as a matter of principle. This is an unreasonable conclusion to reach given that:</p> <p>a) the other proposed Direction for Growth sites are located in the countryside; and b) the Sustainability Appraisal has demonstrated that Jelson's land is more sustainable than the three proposed Direction for Growth allocations.</p> <p>The reasons given by the Council in Appendix 6 of the Sustainability Appraisal for allocating certain sites are equally as unclear. In relation to Stoughton Grange, the Council's reason is given as, <i>"Site is located in the Green Wedge and is to be released through the Local Plan. The Green Wedge boundary has been amended through the Local Plan process... Both OWBC 24 and OWBC 28 form the same site in the Pre-Submission Local Plan. The total number of residential units proposed is 300."</i></p> <p>In our view, none of that provides justification for the allocation of the site. It is simply a description of the site. This also reaffirms our conclusion in Section 5 that the Council has provided no justification for its proposed Green Wedge releases.</p>	
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		<p>A similar issue arises in relation to the Cottage Farm Direction for Growth site (OWBC 44). The Council's reasoning for allocation is given as, <i>"Site is located adjacent to the existing Green Wedge. The Green Wedge is to be extended and part of the proposal site will be located within the extended Green Wedge boundary. The Green Wedge boundary has been amended through the Local Plan process..."</i></p> <p>Again, nothing in that statement seeks to explain or justify the decision to allocate the site instead of a more sustainable option presented by Jelson's land at OWBC 43.</p> <p>Accordingly, for all of these reasons, we conclude that the Plan is unsound because it fails to have regard to the Sustainability Appraisal which forms part of its evidence base and which concludes that Site OWBC 43 is more sustainable than the proposed Direction for Growth allocations. Furthermore, the Plan is unsound because the Council has failed to justify its proposed allocations with regard to the conclusions reached by its evidence base.</p> <p>In order to remedy this error, we conclude that the Council should propose the allocation of Site OWBC 43 for residential development, in recognition of its sustainable location, as demonstrated in the Council's evidence base.</p> <p>Representation</p> <p><i>We conclude that Policies 2, 18, 20 and 21 are not justified, because they do not represent the most appropriate strategy when considered against the reasonable alternatives, as</i></p>	
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		<p><i>demonstrated by the conclusions reached in the Council's Sustainability Appraisal.</i></p> <p><i>We have already concluded elsewhere that the Council needs to revisit its spatial strategy and evidence base in relation to Green Wedges. On the basis of the above, we also conclude that the Council should review its spatial strategy, and in particular its proposed allocations, in the light of the findings of the Sustainability Appraisal, and ensure that it is setting out a strategy that reflects the conclusions of its evidence base. To this end, we suggest that Site OWBC 43 is proposed for allocation in recognition of its sustainable location for new residential development.</i></p>	
18.12.17	Define Planning (Bloor Homes)	<p>POLICY 2: SPATIAL STRATEGY FOR DEVELOPMENT WITHIN THE BOROUGH</p> <p><i>Plan Period</i> The proposed plan period for the Oadby and Wigston Local Plan extends to 2031. It is currently anticipated that the Local Plan will be adopted by June 2018. However, on that basis there will be a 15-year horizon to the end of the plan period. This does not accord with the National Planning Policy Framework (NPPF) which states that 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>" (NPPF, paragraph 157, point 2). Given that objectively assessed development needs (OAN) have been assessed for the period to 2036, the plan period should be extended to ensure that the Local Plan has a time horizon in excess of 15 years and longer term development requirements, including an adequate level of future housing and the infrastructure required to support that, can be provided for.</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>Specific Council responses to comments will be set out below, however those relating to the Local Plan spatial strategy and housing requirements will be set out in the Local Plan Spatial Strategy Submission document that the Council has produced for Local Plan Submission.</p> <p>Throughout the production of the Local Plan, the Council has met the Duty to Cooperate. All local authorities within the Leicester and Leicestershire Housing Market Area (HMA) have good working relationships and a common goal, which is meeting the HMA's Objectively Assessed Need (OAN) in both housing and employment. The Duty to Cooperate Statement document illustrates how the Council has met the Duty to Cooperate throughout Local Plan production.</p>

		<p><i>Housing Land Supply</i> To accord with the NPPF (notably paras 14 & 47), the Local Plan must facilitate a continual supply of both market and affordable housing from a “portfolio” of deliverable development sites based on a robust spatial development strategy, with sufficient flexibility to adapt to rapid change. That will ensure a rolling 5 year housing land supply is maintained, that the overall housing requirements are met within the plan period and that everyone actually has the opportunity of a decent home.</p> <p>The Local Plan’s proposed spatial strategy is, therefore, supported in principle. Developments within the town centres and wider urban area, and on strategic greenfield allocation sites are all required to come forward immediately to ensure that the identified development needs are addressed within the plan period. In that context the proposal to allocate the land at Cottage Farm, Oadby as a Direction for Growth is very much welcomed.</p> <p>It is inevitable, however, that there will be a delay to at least some of the identified development sites in the Local Plan coming forward and/or the rate of their delivery will not be high as currently anticipated. Therefore, the Local Plan housing requirement and land supply should also include a “contingency buffer”.</p> <p><i>Unmet Need & the Duty to Cooperate</i> The Duty to Cooperate (DTC), introduced by the Localism Act 2011, requires the Council to engage “<i>constructively, actively and on an on-going basis to maximise the effectiveness of Local and Marine Plan preparation in the context of strategic cross boundary matters</i>” (NPPG). The NPPF requires (para 181) that</p>	<p>In addition to the Council meeting its own OAN for housing, the Local Plan (at paragraph 4.2.11) illustrates a ‘buffer’ of new additional homes. This buffer would negate any potential delivery issues on allocated sites, as well as help fulfil a proportion of Leicester City’s declared unmet need. It should be noted that Leicester City is the only authority within the Leicester and Leicestershire HMA to declare an unmet housing need. All other authorities can (at least) meet their own identified need.</p> <p>It should be noted that the Borough has worked proactively and positively to meet its OAN for housing, particularly as it has been a huge ‘step’ change. The Local Plan period target of 2960 over the 20 year plan period is a 60 per cent increase on the Core Strategy target of 1800 new homes (over a similar 20 year period).</p> <p>In December 2017, the Council approved the Joint Statement of Co-operation Relating to Objectively Assessed Need for Housing (November 2017). The joint statement sets out that up to 2031 the local authorities within the Leicester and Leicestershire Housing Market Area have sufficient capacity to meet the Leicester and Leicestershire Housing Market Area OAN for housing. The statement sets out that the theoretical total housing capacity of the Leicester and Leicestershire Housing Market Area exceeded the OAN for housing by over 100,000 new homes. In addition, all local authorities within the Leicester and Leicestershire HMA have been working together on the production of the Leicester and Leicestershire Strategic Growth Plan. The relationship of the Strategic Growth Plan to Local Plans is set out at paragraph 1.5.2 of the Local Plan, which states ‘<i>although the Strategic Growth Plan deals with the time period up to 2050, it treats the period’s pre</i></p>
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		<p>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 <i>positive outcome</i> to these strategic planning discussions, even if agreement is not secured on all issues. Compliance with the duty to cooperate is critical to ensure that a Council delivers sustainable development (NPPF paras 150-151) and meets the full objectively assessed needs for market and affordable housing in the HMA (NPPF para 47), including the unmet needs of neighbouring authorities where it is reasonable to do so and consistent with sustainable development (NPPF para 182).</p> <p>The Local Plan refers to the unmet need arising in Leicester (para 4.2.5), but makes no comment on how that need will be addressed in the HMA. The Borough's role in addressing that unmet need may well be limited, but the Borough Council's position is unclear as the Duty to Cooperate Statement referred to in the Local Plan has not actually been made available.</p> <p>That is of great concern as this is clearly a matter that all of the Planning Authorities in the HMA need to address as part of their obligations under the DTC through the preparation of their Local Plan Reviews. It is not appropriate to seek to defer this issue to a future review of the Local Plan as it is understood that the intention is to agree a new Memorandum of Understanding (MOU) between the HMA Authorities as early as January 2018 to address the unmet needs arising in the period to 2031. Nor is it necessary to wait for the preparation of the Strategic Growth Plan, as that is a non-statutory plan that will consider options for guiding growth in the HMA over the period 2031 to 2050.</p>	<p><i>2031 and post 2031 very differently. Pre 2031, the housing and employment Objectively Assessed Needs for the Leicester and Leicestershire HMA, set out within the HEDNA, will be delivered through each of the local authorities individual Local Plan's. The Strategic Growth Plan therefore focuses on the period post 2031, for which it identifies a 'notional housing need'. It recognises that for this period there are no reliable estimates of population growth or household change, thus it estimates future housing needs by projecting forwards the annual figures set out within the HEDNA'.</i></p> <p>The Council will continue to work closely with all authorities within the Leicester and Leicestershire Housing Market Area, not only in providing the required number of homes up to 2031, but post 2031 in line with the Strategic Growth plan. In Local Plan paragraphs 1.5.6 to 1.5.7 the Council has committed to a review of the Local Plan no later than 5 year from adoption (consistent with national policy and guidance) and has also set out what would trigger an earlier review. The Council considers that the commitment shown in paragraphs 1.5.6 to 1.5.7 illustrate the Council's intentions in an appropriate manner. However, the Council would not object if the wording was required to be set out within a new Local Plan policy.</p>
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		<p>The identified unmet need in Leicester is arising now and needs to be addressed now in this Local Plan, and the others currently being prepared around the HMA. A short delay in the submission of the Local Plan will allow the distribution of the development needs to be understood and then agreed ensuring that the unmet needs that are already arising in Leicester are appropriately provided for within the HMA, in accordance with the requirements of the NPPF. A failure to do so will only continue the great uncertainty going forward as to how much development should take place and where, and ultimately lead to a situation where housing needs in the City continue to be ignored.</p> <p><i>Local Plan Review</i></p> <p>The positive statement in the Local Plan to undertake a review of the Local Plan at least every 5 years and in the stated circumstances (para 1.5.6) is welcomed. However, the commitment to a review itself is not an adequate response to the matters set out above that should be addressed now. Moreover, the “commitment” to a Review is not embedded within an actual policy, and cannot be enforced if the Council decide, for whatever reason, not to honour the commitment. The consequence of that is that the identified development needs will not then be addressed. An additional specific Local Plan Review policy is, therefore, required.</p> <p><i>Housing Enabler</i></p> <p>The Council’s commitment within the policy to act as a housing enabler, notably in facilitating the provision of the required supporting infrastructure, is very much welcomed.</p>	
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		<p>Soundness: For the reasons set out above, Bloor Homes object to Policy 2, which is considered unsound on the basis that it:</p> <ul style="list-style-type: none"> - has not been positively prepared as it is not based on a strategy that will ensure that the objectively assessed housing needs, including unmet development requirements arising in Leicester, will be met within the plan period; - is inconsistent with national policy in that it does not fully reflect the Government’s priorities and policies in terms of enabling sustainable development and boosting the supply of housing to meet identified needs. <p>Proposed Change: To remedy the flaws in the soundness of the plan:</p> <ul style="list-style-type: none"> - Policy 2 should identify a housing requirement for a plan period to 2036 (to provide a 15-year time horizon). - That requirement should reflect the up to date, full and objectively assessed needs for housing within the Borough and wider HMA, based on the findings of the HEDNA and the Final MOU between the HMA Authorities that addresses the likely unmet need arising in Leicester City. - The Local Plan should then identify sufficient deliverable and developable supply of housing land with a robust contingency to meet that need in sustainable locations in the Borough. - Provide a Local Plan Review Policy. <p>Summary The proposed plan period for the Oadby and Wigston</p>	
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		adequate response to the matter set out above that should be addressed now. Moreover, the "commitment" to a Review should be embedded within an actual policy.	
18.12.17	Define Planning (Bloor Homes)	<p>POLICY 3: REGENERATION SCHEMES AND LARGE SCALE CHANGE SPATIAL STRATEGY FOR DEVELOPMENT WITHIN THE BOROUGH</p> <p>The requirement for a Masterplan, Development Brief and/or "other appropriate plans or strategies" is not objected to in principle as they can be valuable tools in facilitating the delivery of sustainable development.</p> <p>However, the NPPF requires (para 154) Local Plans policies to: "set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan." The NPPG provides further guidance (Paragraph: 010 Reference ID: 12-010-20140306): "In drafting policies the local planning authority should avoid undue repetition, for example by using generic policies to set out principles that may be common to different types of development. There should be no need to reiterate policies that are already set out in the National Planning Policy Framework."</p> <p>Policy 3 does not meet those requirements. Moreover whilst the policy broadly sets out the matters to be considered within the required documents, it does not provide clear guidance to either the applicant or the decision maker in terms of:</p> <ul style="list-style-type: none"> • Who is responsible for deciding what type document should be prepared? 	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>As the comment mentions NPPF paragraph 154 states 'Local Plans should be aspirational but realistic. They should address the spatial implications of economic, social and environmental change. Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan'. The Council considers that Local Plan Policy 3 Regeneration Schemes and Large Scale Change, sets out clearly 'what will' or 'will not' be permitted. The production of masterplans, development briefs, and other appropriate plans will also support the 'where'.</p> <p>Local Plan Policy 3 Regeneration Schemes and Large Scale Change clearly states that 'when regeneration schemes or large scale change is proposed, the Council will require the production of, either, Masterplans, Development Briefs and / or other appropriate plans or strategies. In conjunction with Leicestershire County Council Highways Department, the Council will also require the production of Transport Assessments'. The Council considers that as the Council is requiring the production of the named above, the policy conforms to and is consistent with national policy set out in the NPPF.</p> <p>In addition, the Policy sets out what should be contained within a masterplan, development brief, and</p>

		<ul style="list-style-type: none"> • Who is responsible for preparing the document? • What level of detail is required? • Should there be consultation? • What status will the document assume? • When should the document be prepared? Can a masterplan be submitted alongside a planning application or does it need to be approved in advance? <p>The policy should, therefore, be recast to provide the required guidance.</p> <p>Soundness: For the reasons set out above, Bloor Homes object to Policy 3, which is considered unsound on the basis that it is inconsistent with national policy in that it does not provide clear policy guidance required to assist the applicant and decision maker.</p> <p>Proposed Change: The policy should be recast to provide the required guidance.</p>	<p>other appropriate plans. The policy also states that the earliest liaison with the Council (amongst others) should be sought. The Council also considers that the policy is clear when the production of masterplans, development proposals and other appropriate plans is required... <i>'when regeneration schemes or large scale change is proposed'</i>.</p>
18.12.17	Define Planning (Bloor Homes)	<p>POLICY 6: HIGH QUALITY DESIGN AND MATERIALS</p> <p>As an advocate of the importance of good design, Bloor Homes support the intent of Policy 6. However, the NPPF is quite clear in its requirements in this regard (para 58): <i>"Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics."</i> It later requires (para 154) Local Plans policies to: <i>"set out the opportunities for development</i></p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The NPPF is clear in paragraph 59 that <i>'...design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally'</i>.</p> <p>The Council considers that Local Plan Policy 6 High Quality Design and Materials guides the design of development and is not overly prescriptive by allowing</p>

	<p><i>and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.”</i> The NPPG provides further guidance (Paragraph: 010 Reference ID: 12-010-20140306): <i>“In drafting policies the local planning authority should avoid undue repetition, for example by using generic policies to set out principles that may be common to different types of development. There should be no need to reiterate policies that are already set out in the National Planning Policy Framework.”</i></p> <p>Policy 6 as currently expressed fails to meet those requirements. It adds little to the design guidance provided in Section 7 of the NPPF, it is imprecise and there is a lack of clarity in the terms used (e.g. “highest quality”). Consequently the policies would be open to wide interpretation and difficult to effectively apply in the development management process.</p> <p>The policy should, therefore, be recast to set out objective design standards that can be addressed through the design process.</p> <p>Notwithstanding that, the NPPF and NPPG both emphasise that the viability of sustainable development schemes should not be undermined by unduly onerous requirements when taking account of the cumulative requirements of the Local Plan (i.e. other infrastructure and specific policy requirements). Indeed, the NPPF (paragraphs 158, 173-174) is clear that these matters must be considered at the plan making stage. Therefore, any design based policy requirements which would result in build and / or site development costs above locally adjusted BCIS rates should be subject to plan wide viability testing. It is clear from the</p>	<p>a level of flexibility. The Council considers that this flexibility allows for individuality, innovation and diversity in design, and does not restrict or curtail design or material use unfairly, and does not impose styles or tastes. Due to this level of flexibility allowed, the Council does not agree that Local Plan Policy 6 would result in increased costs and should be subject to plan wide viability. The level of flexibility allowed for in the Policy is also consistent with national policy set out at paragraph 60 of the NPPF, which states <i>‘planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.</i></p>
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		<p>published evidence base that the viability assessment has not taken these matters into account.</p> <p>Soundness: For the reasons set out above, Bloor Homes object to Policy 3, which is considered unsound on the basis that it is inconsistent with national policy in that it does not provide clear policy guidance required to assist the applicant and decision maker.</p> <p>Proposed Change: The policy should be recast to provide the necessary design guidance and the implications of the requirements must also be robustly assessed.</p>	
18.12.17	Define Planning (Bloor Homes)	<p>POLICY 8: GREEN INFRASTRUCTURE</p> <p>The policy's aspirations in relation to the protection and enhancement of Green Infrastructure (GI) is welcomed. It is, however, unclear how this policy relates to the requirements for open space, sports and recreation provision set out in Policy 9. The Local Plan requirements should not place an unduly onerous burden on new developments as these matters can fundamentally affect the capacity and, therefore, viability of schemes. Further clarity is, therefore, required. Moreover, as highlighted in the response to Policy 9 the provision of multi-functional open spaces that responds to a variety of needs should be encouraged to maximise the benefits of GI and open space provision in association with development.</p> <p>The policy specifically refers to the use of developer contributions to facilitate off-site improvements to existing overall Green Infrastructure assets/corridors. However, there is no statement as to how the need for a contribution will be established and if it is required, how contribution will be calculated and secured, and</p>	<p>The Council is proposing minor modifications to the Local Plan from the comments received from Define Planning for the reasoning set out below.</p> <p>It should be noted that Local Plan Policy 8 does not state that it would seek developer contributions. The Policy wording states that <i>'all new development must contribute towards achieving this net gain. Green Infrastructure assets will be created, preserved managed and where necessary enhanced by...using developer contributions to facilitate off-site improvements to existing Green Infrastructure assets / corridors, particularly their quality and accessibility'</i>.</p> <p>To ensure clarity, the Council proposes to remove the following wording from the 8th bullet of Policy 8 as follows –</p> <p>'using developer contributions to facilitate facilitating off-site improvements to existing Green Infrastructure assets / corridors, particularly their quality and accessibility'.</p>

	<p>the funds then utilised to deliver the required improvements where they are needed. That is a serious omission that needs to be addressed to ensure that the requirement meets the tests established in the 2010 Community Infrastructure Levy Regulations (necessary to make the development acceptable, directly related to the development, and fairly and reasonably related in scale and kind).</p> <p>Moreover, the NPPF and NPPG both emphasise that the viability of sustainable development schemes should not be undermined by unduly onerous requirements when taking account of the cumulative requirements of the Local Plan (i.e. other infrastructure and specific policy requirements). Notably, policies that have a cost implication for development proposals cannot be deferred to an SPD: see <i>William Davis Ltd & Ors v Charnwood Borough Council [2017] EWHC 3006 (Admin) (23 November 2017)</i>. Indeed, the NPPF (paragraphs 158, 173-174) is clear that these matters must be considered at the plan making stage. It is, however, apparent from the published evidence base, that the viability assessment has not taken these matters into account.</p> <p>Soundness: Bloor Homes object to Policy 8, which is considered unsound on the basis that it is inconsistent with national policy in that it does not fully reflect the Government's priorities and policies in terms of enabling sustainable development.</p> <p>Proposed Changes: To remedy the flaws in the soundness of the plan the policy should clarify both the relationship with the public open space requirements set out in Policy 9 and the requirement for contributions to off-site</p>	<p>The Council considers that although it has been suggested that the link between Local Plan Policy 8 and Policy 9 is unclear, the link between open spaces, sport and recreation and Green Infrastructure is clear. Although it is considered that there is an inherent link between the them, the Council at Local Plan paragraph 5.5.5 states that '<i>Local Green Infrastructure within the Borough includes formal and informal open spaces, cemeteries, sports fields, the golf course...</i>'</p>
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		improvements. The implications of those requirements must also be robustly assessed.	
18.12.17	Define Planning (Bloor Homes)	<p>POLICY 9: OPEN SPACE, SPORT & RECREATION FACILITIES</p> <p>Whilst the provision of an appropriate quantum and type of open space in association with development is supported, the scale and nature of public open space required as part of a new development is a fundamental consideration in the planning of development sites. Consequently, the NPPF (paragraph 73) requires Local Plan policies to determine what provision is needed based on a robust and up to date assessment of the local need for open space, that identifies deficits and surpluses in existing provision and takes account of opportunities for new provision. Policy 9, however, fails to provide any clarity in terms of what is required of new developments and how it will be delivered.</p> <p>That is a serious omission that needs to be addressed to ensure that the requirements meet the tests established in the 2010 Community Infrastructure Levy Regulations (necessary to make the development acceptable, directly related to the development, and fairly and reasonably related in scale and kind). Notably, therefore, new developments should not be required to remedy shortfalls in provision or indeed contribute to the provision of facilities where there is sufficient capacity available. That principle should be appropriately reflected in Policy 9, but where an identified deficit does exist or would arise as a result of the development (either in quantitative or accessibility terms), then all new developments should contribute to provision to ensure that the needs of development's population are met.</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The Council considers that the wording of Local Plan Policy 9 as well as the supporting text to the policy is clear in relation to the amount of open space required from a development proposal. The Council also considers that, the Policy (with no reference to remedying existing shortfalls) does not seek to remedy existing shortfalls in provision, nor does it seek to seek contributions to existing facilities where there is sufficient capacity available.</p> <p>As Local Plan paragraph 5.6.11 illustrates, part of the Council's annual monitoring comprises an open space audit that assesses the provision of open space and identifies areas of deficiency and surpluses in provision of open space, sports and recreational facilities. To illustrate surplus and deficiency on a ward by ward level, the audit takes account of the population of the ward and the Council's locally based open space requirements (it should be noted that such space requirements have been discussed and agreed with Sport England). The audit then suggests wards that are deficient in a certain open space typology and / or wards that there is a surplus in provision. This information is then taken account of when negotiating off-site developer contributions towards new open space provision.</p> <p>In addition, the Council considers that as the quantity requirements are set out within the supporting text to Policy 9; the Council's Open Space Audit is specified in the supporting text to Policy 9; the Developer Contributions SPD and Playing Pitch Strategy is</p>

	<p>The policy must, therefore, be recast to clearly set out the expectations in this regard and, in respect of off-site provision, the mechanism(s) for securing the required contributions. The policy should, however, incorporate sufficient flexibility in its requirements to maximise the opportunity for on-site provision to reflect the site specific circumstances and context. It is not, therefore, necessarily helpful to seek to apply blanket requirements for a variety of very specific types of open space that have particular location and design requirements to each and every site. Instead guidance is required that encourages proposals to provide multi-functional spaces that respond to a variety of needs and address the objectives of Policy 8 to maximise the benefits of open space provision associated with development.</p> <p>Notwithstanding that, the specific site requirements, notably for sports provision, often dictate the layout of proposed developments and are a critical determinant of the capacity and, therefore, viability of schemes. The NPPF and NPPG both emphasise that the viability of sustainable development schemes should not be undermined by unduly onerous requirements when taking account of the cumulative requirements of the Local Plan (i.e. other infrastructure and specific policy requirements). Notably, policies that have a cost implication on development proposals cannot be deferred to an SPD: see <i>William Davis Ltd & Ors v Charnwood Borough Council</i> [2017] EWHC 3006 (Admin) (23 November 2017). Indeed, the NPPF (paragraphs 158, 173-174) is clear that these matters must be considered at the plan making stage. It is, however, apparent from the published evidence base that the viability assessment has not taken these matters into account.</p>	<p>specified within the Policy wording and supporting text of Policy 9; and the Community Infrastructure Levy sets out that compliant infrastructure projects should satisfy the three statutory tests, as set out in CIL Regulation 122(2), all appropriate and relevant documentation is cited and available.</p>
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		<p>Soundness: Bloor Homes object to Policy 9, which is considered unsound on the basis that it:</p> <ul style="list-style-type: none"> - is not justified in that it is not the most appropriate strategy and has not properly considered reasonable alternative strategies; and - is inconsistent with national policy in that it does not fully reflect the Government's priorities and policies in terms of the provision of public open space and facilitating the delivery of sustainable development. <p>Proposed Changes: To remedy the flaws in the soundness of the plan, the policy should be recast to reflect the findings of an up to date assessment of local need for open space. The policy should incorporate sufficient flexibility in the required provision to allow account to be taken of the existing (or proposed) provision in the area and the specific characteristics of the development site and to encourage the delivery of multi-functional public open space in the context of the aspirations of Policy 8 in relation to Green Infrastructure.</p>	
18.12.17	Define Planning (Bloor Homes)	<p>POLICY 10: PUBLIC REALM</p> <p>The policy's aspirations in relation to the public realm within proposed development is supported.</p> <p>However, the policy also refers to the use of developer contributions to facilitate off-site improvements to existing public realm, although there is no indication within the policy as to how the need for the contributions will be established, and if it is required how the contribution will be calculated and secured and the funds then utilised to deliver the required improvements where they are needed. That is a</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>Local Plan paragraph 5.7.10 states that '<i>any developer contributions sought will be in accordance with the Borough Council's Developer Contributions Supplementary Planning Document</i>'.</p> <p>The Council's Developer Contribution SPD seeks developer contributions in conformity with government guidance, policy, legislation and regulations, therefore the Council does not consider it appropriate to repeat such within the Local Plan Policy. As the Council will</p>

		<p>serious omission that needs to be addressed to ensure that the requirements meet the tests established in the 2010 Community Infrastructure Levy Regulations (necessary to make the development acceptable, directly related to the development, and fairly and reasonably related in scale and kind).</p> <p>Moreover, the NPPF and NPPG both emphasise that the viability of sustainable development schemes should not be undermined by unduly onerous requirements when taking account of the cumulative requirements of the Local Plan (i.e. other infrastructure and specific housing requirements). Notably, policies that have a cost implication on development proposals cannot be deferred to an SPD: see <i>William Davis Ltd & Ors v Charnwood Borough Council [2017] EWHC 3006 (Admin) (23 November 2017)</i>. Indeed, the NPPF (paragraphs 158, 173-174) is clear that these matters must be considered at the plan making stage. It is, however, clear from the published evidence base that viability assessment has not taken these matters into account.</p> <p>Soundness: Bloor Homes object to Policy 10, which is considered unsound on the basis that it is inconsistent with national policy in that it does not fully reflect the Government's priorities and policies in terms of enabling sustainable development.</p> <p>Proposed Changes: To remedy the flaws in the soundness of the plan the policy should justify and clarify the requirements for contributions to off-site public realm improvements. The implications of those requirements must also be robustly assessed.</p>	<p>only be seeking developer contributions in conformity with the Developer Contributions SPD, therefore in conformity with CIL legislations / regulations, it will not be burdening development proposals with undue costs; it will be seeking contributions that are required by the planning process for mitigation purposes. As such it was not considered necessary to include this Policy within the Whole Plan Viability evidence base.</p>
18.12.17	Define Planning	POLICY 11: HOUSING CHOICES	Comment noted. No proposed change to the Local Plan

	(Bloor Homes)	<p>The overarching aspiration of Policy 11 is not objected to as it seeks to ensure the delivery of sustainable housing developments.</p> <p>However, the NPPF requires (para 58) Local Plan to: <i>"develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics."</i> It later requires (para 154) Local Plans policies to: <i>"set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan."</i> The NPPG provides further guidance (Paragraph: 010 Reference ID: 12-010-20140306): <i>"In drafting policies the local planning authority should avoid undue repetition, for example by using generic policies to set out principles that may be common to different types of development. There should be no need to reiterate policies that are already set out in the National Planning Policy Framework."</i></p> <p>Policy 11 as currently expressed fails to meet those requirements. It adds little to the requirements of the NPPF in terms of the required housing mix, and is imprecisely expressed which means that it will be open to wide interpretation. Greater clarity is, therefore, required as to how the policy will be effectively applied at the development management stage.</p> <p>There is no evidence that space provision in new dwellings the Borough is in any way substandard, but the policy still seeks to impose a vaguely expressed</p>	<p>document for the reasoning set out below.</p> <p>The Council is committed in providing a wide choice of homes that are of high quality and are 'fit for purpose' for modern day living and promote healthy lifestyles and good mental wellbeing, particularly in children and young people.</p> <p>Local Plan Policy 11 Housing Choices does promote the use of the Governments Technical Housing Standards, however in very particular circumstances. The Council through Policy 11 is only seeking to apply the technical standards for conversions, sub-division and / or changes of use of existing buildings, for example redundant commercial or factory units.</p> <p>The Council seeks the use of the technical standards in these specific circumstances due to the relatively high number of extant commercial and factory units in predominately residential areas of the Borough and the low standard of development proposals for their sub-division that have been promoted in recent history. On a non statutory basis, through the planning application negotiation process, the Council has been successfully applying the standards on sub-division of existing commercial or factory properties. Thus far, the Council has not been made aware of any viability issues due to the applying of the technical standards in specific development proposals.</p>
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		<p>requirement for new dwellings to be of an appropriate size. Notably the Technical Housing Standards are appended to the Local Plan. However, the Written Ministerial Statement dated 25th March 2015 confirms that <i>"the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG"</i>. Therefore, if the Council wishes to adopt the NDSS up to date evidence of local need, together with assessments of the cumulative impact of the policy on viability, the implications of costs to being passed on to homebuyers, and the potential impact development delivery rates must be provided. That evidence has not been provided and the imposition of this requirement (however vaguely expressed) has not, therefore, been justified in accordance with the requirements of the National Planning Practice Guidance (NPPG Paragraph: 020 Reference ID: 56-020-20150327). There is therefore, no justification for the inclusion of this element of the policy, and it should therefore, be deleted.</p> <p>As a general point, whilst the reference in the policy to taking account of the impact on deliverability and/or viability of developments is welcomed, these matters will have a critical affect on the viability of new housing developments in the Borough, and the deliverability of sustainable development cannot be compromised by unduly onerous policy requirements. Notably, policies that have a cost implication on development proposals cannot be deferred to an SPD: see <i>William Davis Ltd & Ors v Charnwood Borough Council [2017] EWHC 3006 (Admin) (23 November 2017)</i>. The Council must, therefore, demonstrate that the policy and infrastructure requirements in the Local Plan (cumulatively) in terms of financial contributions are</p>	
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		<p>achievable and do not render development unviable (NPPF paragraphs 158, 173-174). That must be considered at this stage. There is no evidence to that effect at this point in time as these policy requirements have not been robustly considered Local Plan's Viability Report.</p> <p>Soundness: For the reasons set out above, Bloor Homes object to Policy 11, which is considered unsound on the basis that it:</p> <ul style="list-style-type: none"> - is not justified in that it is not the most appropriate strategy and has not properly considered reasonable alternative strategies; and - is inconsistent with national guidance in that it does not fully reflect the Government's objective to ensure the housing requirements are not prohibitive to the delivery of development. <p>Proposed Changes: To remedy the flaws in the soundness of the plan, the policy should be recast to provide to provide greater clarity in respect the policy requirements and the cumulative impact on the viability of sustainable development examined. The part relating to spaces standards should be deleted.</p>	
18.12.17	Define Planning (Bloor Homes)	<p>POLICY 13: AFFORDABLE HOUSING</p> <p>Bloor Homes fully support the provision of affordable housing as an integral part of housing development in order to meet the affordable housing needs of the Borough. However, it is important that the affordable housing provision reflects site and location specific variables and the changing needs of the District over the plan period, both in terms of quantum and tenure.</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The Viability evidence base undertaken for the Local Plan illustrates that the policy requirements set out within the document are viable and do not threaten viability.</p> <p>Due to the Borough's affordable housing need, the</p>

	<p>Provision must, therefore, be based upon the most up to date evidence available, including the monitoring of market activity over the plan period to identify the ability of developers to deliver affordable housing across the differing locations within the Borough. In light of that, the proposed affordable housing tenure mix of 75% affordable / social rent and 25% intermediate is unduly prescriptive. The Government's proposals for Starter Homes as set out in the Housing White Paper alongside other affordable home ownership and rented tenures as a means of boosting the provision of affordable housing across the District should also be considered. This broadening of the approach to housing mix will allow for greater flexibility and will in turn assist in ensuring delivery.</p> <p><i>Soundness:</i> For the reasons set out above, Bloor Homes object to Policy H2, which is considered unsound on the basis that it:</p> <ul style="list-style-type: none"> - is not justified in that it is not the most appropriate strategy and has not properly considered reasonable alternative strategies; and - is inconsistent with national guidance in that it does not fully reflect the Government's objective to ensure affordable housing requirements are not prohibitive to the delivery of sustainable development. <p><i>Proposed Changes:</i> To remedy the flaws in the soundness of the plan:</p> <ul style="list-style-type: none"> - The policy should include Affordable Housing requirements that do not undermine the viability of schemes and delay / prevent sustainable development; and <p>The policy should include sufficient flexibility to allow</p>	<p>Council is committed in delivering affordable housing, however is totally aware of the affect affordable housing can have on the viability of development proposals. As mentioned, the Local Plan has been subject to viability evidence base, which illustrates that the policy requirements, as set out, are viable and deliverable. In certain cases, particularly in Oadby, the viability evidence base suggested higher percentages of affordable housing provision, and a lowering of the affordable housing threshold.</p>
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		development to respond to site-specific constraints, evidence of need and the provision of other forms of affordable housing.	
18.12.17	Define Planning (Bloor Homes)	<p>POLICY 14 SELF BUILD</p> <p>It is acknowledged that self-build and custom house building is an element of the Government’s housing strategy. However, no clear evidence of need or demand in the Borough has been presented in the Local Plan’s evidence base. Reference is made to the Council’s register, but those registered are not required to be means tested and, therefore, in reality the demand is likely to be significantly lower. Moreover, the requirement has not been justified or tested in terms of the potential impact on the deliverability of development schemes as required by the NPPF (paragraphs 158, 173-174). This requirement could have a critical affect on the viability of new housing development in the Borough, and the deliverability sustainable development cannot be compromised by unnecessary and unduly onerous requirements.</p> <p>In that light the Council’s approach to self / custom build should be to increase the total amount of new housing developed by supporting development on small windfall sites as well as allocating additional small sites rather than by establishing a policy requirement for inclusion of such housing on larger allocated sites.</p> <p>Soundness: For the reasons set out above, Bloor Homes object to Policy 14, which is considered unsound on the basis that it:</p> <ul style="list-style-type: none"> - is not justified in that it is not the most appropriate strategy and has not properly considered reasonable alternative strategies; and 	<p>Comment noted.</p> <p>To ensure that the Council is acting positively and proactively it does not consider it appropriate to remove Local Plan Policy 14 Self Build and Custom Build. It should be noted that Local Plan Policy 14 Self Build and Custom Build does not <u>require</u> the provision of custom and / or self build, it seeks to <u>encourage</u> provision of plots. Therefore if the provision of Self Build and Custom Build plots (through the planning application process) had significant negative impacts on the viability of development proposals, the Council would not require its provision.</p> <p>In addition, to ensure consistency with Local Plan Policy 14, the Council would not be opposed to a rewording of the relevant policy bullet points (in Local Plan Policy 18, 20 and 21) in relation to provision of Self Build and Custom Build, that sought an ‘encouragement’ for provision, rather than a ‘requirement’ for provision.</p>

		<ul style="list-style-type: none"> - is inconsistent with national guidance in that it does not fully reflect the Government’s objective to ensure the housing requirements are not prohibitive to the delivery of development. <p>Proposed Change: Delete the policy.</p>	
18.12.17	Define Planning (Bloor Homes)	<p>POLICY 21 COTTAGE FARM DIRECTION FOR GROWTH</p> <p>In order to meet the identified housing needs in the Borough, the Local Plan seeks to facilitate a continual supply of both market and affordable housing from a “portfolio” of deliverable development sites based on a robust spatial development strategy. The allocation of the Cottage Farm Direction of Growth in Policy 21 as a fundamental part of that strategy is very much welcomed and supported.</p> <p>Bloor Homes Ltd are in the process of implementing a planning permission for the delivery of 150 dwellings on land south of Cottage Farm, Oadby (Phase I). They also control additional land to the west and south west of the committed development scheme (Phase II). The initial site assessments and masterplanning undertaken in relation to the Phase II site have indicated that a further 250 dwellings, associated public open space and infrastructure can be provided. That will therefore, make a significant contribution to meeting market and affordable housing needs in the plan period, and provide competition and choice in the housing market.</p> <p>The Cottage Farm site relates well to the existing southern edge of Oadby’s urban form. The services and facilities within the surrounding area (notably</p>	<p>Comment of support noted.</p> <p>To ensure that the Council is acting positively and proactively it does not consider it appropriate to remove Self Build and Custom Build from the policy, however to ensure consistency with Local Plan Policy 14, the Council would not be opposed to a rewording of the relevant policy bullet points (in Local Plan Policy 18, 20 and 21) in relation to provision of Self Build and Custom Build, that sought an ‘encouragement’ for provision, rather than a ‘requirement’ for provision.</p>

		<p>Gartree High School and Beauchamp College, Oadby Town Centre that includes local shops, a post office, a library and a doctors surgery, and the supermarket and health centre on the A6) would be readily accessible to future residents.</p> <p>The site is not subject to any nationally significant or local environmental, landscape or cultural designations, and it is apparent that there are no over riding or particular constraints to development in respect of highways, drainage, landscape, ecology, archaeology and cultural heritage. Indeed, the emerging Masterplan proposals that have already been submitted to the Borough Council demonstrate the suitability and capacity of the site for development.</p> <p>The scheme proposals have been prepared with a clear knowledge and understanding of the specific characteristics of the site (the opportunities and constraints). The core aim is to create an attractive and sustainable environment that respects, and responds to, the site's setting, retaining natural key features wherever possible, and taking advantage of the existing landscape framework to create a high quality distinctive development with a sense of place that is well integrated into its surroundings. Moreover, an iterative assessment and design process has ensured that the appropriate mitigation required to address the potential environmental impacts that may arise, notably on the landscape character and visual amenity of the area, have been embedded into the emerging Masterplan proposals.</p> <p>The development will be access scheme via the committed Phase I development that will provide a new signal controlled T-junction onto the A6 Glen Road. The access junction incorporates signal controlled</p>	
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		<p>pedestrian and cycle crossing points and would have sufficient operating capacity to cater for the full 400 dwellings proposed in Phases I and II of the development.</p> <p>The development proposals for Phase II also provide the opportunity to:</p> <ul style="list-style-type: none"> • Enhance the pedestrian and cycle routes/links to provide safe and convenient routes to local facilities and amenities and bus services on Glen Road and within Coombe Rise; • Provide a variety of landscaped public open spaces including a substantial extension to Coombe Park providing much needed additional formal sports facilities and car parking in the area with a new access from within the Cottage Farm development; and • Incorporate a robust Green Infrastructure Strategy that seeks to structure the development proposals, enhance the area's landscape character and biodiversity, connect the proposed public open spaces and provide new pedestrian links to the existing public right of way network to enhance the connectivity of the urban area to the surrounding countryside <p>The Phase II site is available and suitable for development, and the emerging scheme is deliverable. It is a realisable opportunity that would make a significant contribution to meeting the identified development needs in Oadby and the Borough within the plan period, and positively contribute to the economic, social and environmental objectives of sustainable development advocated by the NPPF.</p>	
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		<p>Therefore, as stated above, its proposed allocation is supported.</p> <p>However, in respect of the terms of Policy 21, Bloor Homes do have concerns in relation to the requirements to include self build and custom build plots as part of the Phase II development. Whilst it is acknowledged that self-build and custom house building is an element of the Government's housing strategy, no clear evidence of need or demand in the Borough has been presented in the Local Plan's evidence base. Reference is made to the Council's register, but those registered are not required to be means tested and, therefore, in reality the demand is likely to be significantly lower. Moreover, the requirement has not been justified or tested in terms of the potential impact on the deliverability of the development scheme as required by the NPPF (paragraphs 158, 173-174). This requirements should, therefore, be deleted from the policy.</p> <p>Soundness:</p> <p>For the reasons set out above, Bloor Homes support the allocation of the Cottage Farm site for residential development, but object to the requirement within Policy 21 to provide self-build plots, which is considered unsound on the basis that it:</p> <ul style="list-style-type: none"> - is not justified in that it is not the most appropriate strategy and has not properly considered reasonable alternative strategies in terms of provision for self build; and - is inconsistent with national guidance in that it does not fully reflect the Government's objective to ensure the housing requirements are not prohibitive to the delivery of development. 	
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		<p>Proposed Change: The requirement to provide for self build plots should be deleted.</p>	
18.12.17	Define Planning (Bloor Homes)	<p>POLICY 38 – CLIMATE CHANGE, FLOOD RISK AND RENEWABLE LOW CARBON ENERGY</p> <p>The aspiration of this policy is recognised. However, the NPPF requires (para 154) Local Plans policies to: <i>“set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a <u>clear indication</u> of how a decision maker should react to a development proposal should be included in the plan.”</i> The NPPG provides further guidance (Paragraph: 010 Reference ID: 12-010-20140306): <i>“In drafting policies the local planning authority should avoid undue repetition, for example by using generic policies to set out principles that may be common to different types of development. There should be no need to reiterate policies that are already set out in the National Planning Policy Framework.”</i></p> <p>Policy 38 does not achieve these objectives. Indeed, the first part of the policy appears to simply repeat the requirement to comply with Building Regulations. Furthermore, the requirement to submit a separate sustainability statement for major development schemes is unduly onerous, particularly where building and water efficiency standards are covered by other regulations, accessibility will be dealt with through the preparation of the Design and Access Statement and Transport Assessment.</p> <p>The last part of the policy relates to renewable and low carbon energy and requires all developments of 100 dwellings or more to incorporate on-site renewable energy generation or provision of building that reduce</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>Paragraph’s 93 to 104 of the National Planning Policy Framework state that Local Planning Authority’s should adopt proactive strategies to mitigate and adapt to climate change, taking account of flood risk. The NPPF also suggests that to help increase the use and supply of renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources.</p> <p>Through Local Plan Policy 38 Climate Change, Flood Risk and Renewable Low Carbon Energy, the Council is taking a proactive approach to delivering development that seeks to deliver the policy objectives in NPPF paragraph’s 93 to 104.</p> <p>In addition, the Council does consider that the Policy wording avoids undue repetition and does not put unduly onerous requirements on development proposals. The Council considers that having development proposals accompanied with a Sustainability / Energy Statement enables the Council to properly assess the development proposal to ensure that it meets the policy objectives of national policy and guidance.</p> <p>The Council would like to highlight that the Policy wording does not state that the threshold for the incorporation of on-site renewable energy regeneration etc is 100 dwellings or more, as suggested by Define Planning. The threshold set out within the Policy is</p>

		<p>the need for non-renewable energy use. The policy is, however, imprecisely expressed and there is a lack of clarity in terms of the threshold and required standards. Consequently the policy could be open to wide interpretation and difficult to effectively apply in the development management process.</p> <p>Moreover, whilst the reference in the policy to taking account of the impact on feasibility of developments is welcomed, these matters will have a critical affect on the viability of new housing developments in the Borough, and the deliverability of sustainable development cannot be compromised by unduly onerous policy requirements. The Council must, therefore, 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 paragraphs 158, 173-174). That must be considered at this stage. There is no evidence to that effect at this point in time as these policy requirements have not been robustly considered Local Plan's Viability Report.</p> <p>The policy should, therefore, be recast to set out objective standards that are justified by an appropriate evidence base.</p> <p>Soundness: Bloor Homes object to Policy 38, which is considered unsound on the basis that it:</p> <ul style="list-style-type: none"> - is not effective as a means of ensuring development mitigates climate change without unduly restricting the viability and/or delivery of development; and - is inconsistent with national guidance in that it does not fully reflect the Government's 	<p>developments of greater than 1 hectare in size. The Council considers that the threshold is clarified within the Policy wording.</p>
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		<p>objective to ensure the housing requirements are not prohibitive to the delivery of development.</p> <p>Proposed Change: The policy should be recast to provide the required guidance.</p>	
18.12.17	Define Planning (Bloor Homes)	<p>POLICY 42: GREEN WEDGES</p> <p>The historic role of Green Wedges as an effective policy tool in the Borough is recognised. However, the proposal to extend the Oadby and Wigston Green Wedge is objected to.</p> <p>The evidence base sets out an assessment of the role of the extant Green Wedge designation against the assessment methodology agreed across the County and the stated policy objectives. However, no justification whatsoever is given for the proposed extension of that Green Wedge in terms of the specific merits of this area in relation to the express purposes of the designation.</p> <p>In considering the four specific aims set out in Policy 42, the extension of the area of protection is not necessary to prevent the merging of settlements or to guide the form of development. Even with the allocation of the Cottage Farm Direction for Growth there would still be a wide expanse of countryside between Oadby and Wigston (much wider than the area to the north that is currently designated as Green Wedge). There would be no physical coalescence or, indeed, a perception of coalescences given the limited inter-visibility between the two urban areas in this locality.</p> <p>Nor is the designation of the area required to provide a green lung between the urban area and countryside, or</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The Council is surprised by Define Planning's representation suggesting that the extension to the Oadby and Wigston Green Wedge is not justified.</p> <p>The Council has been working collaboratively with Bloor Homes (and Define Planning) throughout the preparation of the Local Plan (specifically relating to the Cottage Farm Direction for Growth area) and has previously specified the Council's requirement to extend the Oadby and Wigston Green Wedge. At no point during those previous discussions had Bloor Homes (or Define Planning) objected to the extension of the green wedge.</p> <p>The Council agrees that once the Cottage Farm Direction for Growth is built out as planned for in the Local Plan, there would be no physical coalescence, however the objectives of a green wedge comprise of more than just coalescence. There are four objectives of a green wedge specified within Local Plan Policy 42 Green Wedges –</p> <ul style="list-style-type: none"> • Prevent the merging of settlements, • Guide development form, • Provide a 'green lung' between the urban area and the countryside, • Act as a recreational resource.

		<p>provide a recreational resource. It would remain a fully functional part of the wider countryside in agricultural use and with public access limited to the few existing public rights of way that run through the area.</p> <p>As such the designation of this area as an extension to the Green Wedge is neither necessary nor justified. Moreover, there are sufficient policies within the Local Plan to appropriately guide development management decisions in this area without the imposition of further restrictive measures.</p> <p>Soundness For the reasons set out above, Bloor Homes object to Policy 42, which is considered unsound on the basis that it is not justified in that it is not the most appropriate strategy and has not properly considered reasonable alternative strategies.</p> <p>Proposed Change Delete the extension to the Green Wedge designation that applies to the area between Oadby and Wigston.</p>	<p>The extension of the Oadby and Wigston Green Wedge has been allocated by the Council as it considers that it is required to guard against future coalescence of the two settlements, guide development form, act as a recreational resource and provide a 'green lung' between the urban area and the countryside. It should be noted that the Council's Green Wedge Review 2017 recommends the extension of the Oadby and Wigston Green Wedge, as it will guide development form in future years by defining development limits, as well as preventing any future coalescence of the two settlements of Wigston and Oadby.</p>
18.12.17	Define Planning (Bloor Homes)	<p>POLICY 43 COUNTRYSIDE</p> <p>Objection is raised to Policy 43 as it seeks to impose a pre-NPPF style "blanket" protection of the countryside and constraint on development. That approach clearly does not comply with the policy requirements of the NPPF which no longer uses the language of seeking to protect the countryside simply because it is countryside. Instead, in trying to balance the need for development, it refers to recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it (at paragraph 17 point 5). As such it does not preclude development in the countryside and it would be inappropriate for the Local Plan to seek to do so.</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>Due to the Borough being relatively small in size and compact and urban in nature, green open spaces are extremely important to the communities that reside in the Borough and the biodiversity also. Bearing this in mind, the Council considers that Local Plan Policy 43 Countryside is not a 'blanket' protection policy as suggested by the representation. The Policy seeks to protect and manage the countryside from inappropriate development. The 3rd paragraph clarifies the position regarding development within the countryside – <i>'some forms of development may be required in the Countryside. Development justified as necessary in the</i></p>

		<p>Furthermore, it is inevitable that development in the countryside will have some impact on the matters highlighted in the policy, and that needs to be recognised within the terms of the policy. Moreover, whilst the policy acknowledges that a need for the development may outweigh any adverse impacts that would arise, it should also recognise the potential for other socio-economic benefits to influence that judgement.</p> <p>Soundness For the reasons set out above, Bloor Homes object to Policy 43, which is considered unsound on the basis that it:</p> <ul style="list-style-type: none"> - has not been positively prepared as it is not based on a strategy that will ensure that the objectively assessed housing needs, including unmet development requirements arising in Leicester, will be met within the plan period; - is inconsistent with national policy in that it does not fully reflect the Government’s priorities and policies in terms of enabling sustainable development and boosting the supply of housing to meet identified needs. <p>Proposed Change The policy should be revised to more closely reflect the policy approach required by the NPPF.</p>	<p><i>Countryside must be appropriate in terms of layout, scale height, materials, form, impact and setting’.</i></p>
18.12.17	Define Planning (Bloor Homes)	<p>POLICY 44 LANDSCAPE AND CHARACTER</p> <p>The aspiration to support the conservation and enhancement of valued landscapes as provided for by paragraph 109 of the NPPF is recognised</p> <p>However, the NPPF states (para 113) that Local Plans</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The Borough area is extremely diverse in terms of landscape character and the Council considers it imperative that this diversity is conserved and strengthened where possible.</p>

		<p>should include criteria based policies where the level of protection is commensurate with the status of the landscape areas. Policy 44 goes beyond that in stating that development will not be permitted unless it is “in keeping” with the area in which it is situated. It is inevitable that the development of a greenfield site will have some impact on the landscape character of the site and the locality, and that needs to be recognised within the terms of the policy. Moreover, there is no balancing reference to the potential wider benefits of the development which may outweigh any specific harm. As a result, the application of the policy will unduly prevent / delay otherwise sustainable development.</p> <p>Soundness: For the reasons set out above, Bloor Homes object to Policy 44, which is considered unsound on the basis that it is inconsistent with national policy.</p> <p>Proposed Change: The policy should be revised to more closely reflect the proportional approach required by the NPPF.</p>	<p>The Council considers that Local Plan Policy 44 Landscape and Character proactively seeks to conserve and enhance and does not unduly prevent or delay sustainable development. The Council does not seek development that ‘standardises’ development across the Borough area. The Council is aware that development within greenfield areas will have an impact on the open rural landscape, however such development will be required to be in keeping with the existing adjacent urban form.</p>
18.12.17	Define Planning (Bloor Homes)	<p>POLICY 48 INFRASTRUCTURE</p> <p>The intent of Policy 48 is supported as it is critical that the future growth in the Borough is appropriately supported by the necessary community, highway and utilities infrastructure.</p> <p>However, the critical role of other bodies in the planning, funding and delivery of infrastructure should also be explicitly referred to in the policy 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</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The Council considers that it has demonstrated that the policy and infrastructure requirements of the Local Plan are viable and achievable. Such has been demonstrated within the Council’s Whole Plan Viability report evidence base document.</p> <p>For clarity, the Council propose the inclusion of some minor wording to paragraph 11.1.6, as follows –</p> <p><i>‘...as set out in the Community Infrastructure Levy Regulations, as well as guidance set out in the National</i></p>

		<p>development. Their investment programmes are not necessarily integrated with Local 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> <p>Moreover, the Borough Council must demonstrate that the policy and infrastructure requirements in the Local Plan (cumulatively) are achievable and do not render sustainable development unviable (NPPF paragraphs 158, 173-174). That must be considered at this stage.</p> <p>Soundness: For the reasons set out above, Bloor Homes object to Policy 44, which is considered unsound on the basis that it has not been positively prepared as it is not based on a strategy that will ensure that the objectively assessed housing needs will be met within the plan period.</p> <p>Proposed Change: The policy and infrastructure requirements of the plan should be tested to ensure that they do not unduly restrict sustainable development coming forward and Policy 44 should be revised as set out the role of the infrastructure providers and the Borough Council.</p>	<p><i>Planning Practice Guidance. Any contributions sought by the Council will be done so through the guidance set out in the Council’s Developer Contributions Supplementary Planning Document’.</i></p>
18.12.17	Coop	<p><u>Policy 2 (Spatial Strategy for Development within the Borough)</u></p> <p>The Co-op support the Plan strategy to deliver at least 2,390 new additional homes in the Plan period to 2031 and in particular, the allocation of 1,159 net additional homes on the Direction for Growth sites. It is considered that Policy 2 is positively prepared, justified and consistent with National Policy and for these reasons, meets the tests of soundness.</p>	<p>Comment of support welcomed.</p> <p>The Council would like to reiterate that the Plan’s strategy is to deliver at least 2960 new additional new homes up to 2031.</p>
18.12.17	Coop	<p><u>Policy 3 – Regeneration Schemes and Large Scale</u></p>	<p>Comment of support welcomed.</p>

		<p><u>Change – Co-op</u></p> <p>The Co-op support the use of, either, Masterplans, Development Briefs and / or other appropriate plans or strategies in the case of sites delivering large scale change. In particular, strategic highways matters should be addressed in conjunction with Leicestershire County Council Highways Department.</p> <p>Officers will be aware that the Co-op has been working constructively with both the Borough and County Councils in respect of our interests at the Stoughton Estate in recent years. The intention is to continue that relationship to deliver well-planned growth in the north of the Borough.</p>	
18.12.17	Coop	<p><u>Policy 18 – Stoughton Grange Direction for Growth and Oadby Cemetery Allocation – Co-op</u></p> <p>As the Council is aware, the Co-op has extensive interests in land at the Stoughton Estate in Oadby. Naturally, the Co-op supports and welcomes the Stoughton Grange Direction for Growth area allocation, including the delivery of at least 300 dwellings with associated Class A1 – A4 uses at Stoughton Grange.</p> <p>Importantly, this allocation will safeguard the Eastern District Distributor Road (EDDR) route and also make provision for appropriate land for cemetery and burial uses. It is considered that Policy 18 has been positively prepared and clearly justified by the technical information provided to the Council to date and further survey work which is ongoing.</p> <p>It is also clearly effective as the Co-op is currently preparing an outline planning application on the allocation site for submission in 2018. This will demonstrate that the site is deliverable and as such, suitable for allocation within the emerging Local Plan.</p>	Comment of support welcomed.

		Importantly, this will also demonstrate to the Local Plan Examination that the Stoughton Grange Direction for Growth policy meets the relevant tests of soundness.	
18.12.17	Davidsons Group		Comments made by Davidsons Group have been incorporated into the Landmark Planning (Land North of Newton Lane) comments and responses. Landmark Planning has submitted comments on behalf of Davidsons Group for Land North of Newton Lane, however due to IT issues could not supply the accompanying Transport Appraisal and Landscape Framework Plan. Davidsons Group submitted the accompanying appraisal and framework plan.
18.12.17	Environment Agency	<p>Thank you for giving the Environment Agency the opportunity to comment on your Local Plan Pre-Submission version.</p> <p>The Environment Agency has reviewed the Plan and associated evidence-base documents from the perspective of those environmental issues which fall within our remit.</p> <p>Whilst we do consider the Plan to be legally compliant and sound, and we are pleased to see that a lot of the comments made in our letter dated 05 January 2017 in response to the Preferred Options consultation have been incorporated into the Plan, we do wish to make the following comments.</p> <p>In order to strengthen paragraph 10.1.4 we would suggest adding at the end of that paragraph the following wording:</p> <p><i>"In all cases, any negative impacts to protected and priority habitats and species should be avoided".</i></p>	<p>Comment of support welcomed.</p> <p>Upon the Environment Agency's advice, to strengthen the supporting text at paragraph 10.1.4 the Council would propose the minor wording addition as proposed.</p> <p>The paragraph would read –</p> <p><i>'...that may be impacted. In all cases, any negative impacts to protected and priority habitats and species should be avoided.'</i></p>
18.12.17	Environment Agency	We note that the comments made regarding the Water Framework Directive (WFD) in our letter of 05 January 2017 in response to the Preferred Options consultation	<p>Comment of support welcomed.</p> <p>Upon the Environment Agency's advice, to strengthen</p>

		<p>don't appear to have been incorporated into the Pre-Submission version, and whilst this does not cause the Plan to be unsound, we do consider it to be a missed opportunity to highlight the importance of the WFD. We acknowledge the Officers responses to the Preferred Options consultations includes <i>"The Council will...ensure that it has taken account of the Water Framework Directive and its relationship to the Humber River Basin Management Plans, (*) as referenced by the Environment Agency"</i>. However, having a statement over and above that provided in paragraph 10.3.3 of the Plan (or additional wording to that paragraph) explicitly emphasising the importance of adhering to the WFD and its requirement of no deterioration would have been welcomed.</p> <p>(*The latest River Basin Management Plans were released in 2015).</p>	<p>the supporting text at paragraph 10.3.3 the Council would propose the minor wording addition as proposed.</p> <p>The paragraph would read –</p> <p><i>'...sustainable protection of water quality. Development proposals that are likely to impact surface or groundwater should consider the requirements of the Water Framework Directive'</i></p>
18.12.17	Gladman	<p>Duty to Cooperate</p> <p>It is accepted that Oadby and Wigston have fulfilled the legal requirements on the Duty to Cooperate as they have been working alongside the other Leicester and Leicestershire authorities commissioning joint evidence base work and assisting in the preparation of the Strategic Growth Plan (SGP).</p> <p>However, there are some concerns over the Duty to Cooperate when it comes to the soundness of the OWLP.</p> <p>Many local authorities across the country are currently working at a rate of knots to submit their Local Plans before March 2018 in order avoid potential issues with the standardised approach to housing needs. Whilst the importance of having local plans in place is acknowledged, it is vital that this is not at the expense</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The Council would like to reiterate that the Local Plan process for all of the Leicester and Leicestershire HMA authorities is different to the process of the Leicester and Leicestershire Strategic Growth Plan.</p> <p>In December 2017, the Council approved the Joint Statement of Co-operation Relating to Objectively Assessed Need for Housing (November 2017). The joint statement sets out that up to 2031 the local authorities within the Leicester and Leicestershire Housing Market Area have sufficient capacity to meet the Leicester and Leicestershire Housing Market Area OAN for housing. The statement sets out that the theoretical total housing capacity of the Leicester and Leicestershire Housing Market Area exceeded the OAN for housing by over 100,000 new homes.</p>

		<p>of the proper planning for areas and communities. These representations highlight some of our concerns regarding the Pre-Submission Draft of the Plan, in particular regarding the absence of a strategic approach to the distribution of housing needs across the HMA and how the anticipated needs of people and families living in the HMA may otherwise go unmet without practical solutions to such issues being secured through positive cooperation.</p> <p>The need to positively plan to meet full housing needs across housing market areas should not be underestimated. It is all too easy for the duty to cooperate to be seen as an administrative exercise, however the fundamental social and economic need to ensure a supply of good quality housing to meet the homes and employment requirements across the wider area is a key issue that must be addressed properly through the plan making process. Whilst it may be the case that a local planning authority has sought to work positively with its neighbours, the extent to which a plan tackles strategic priorities that arise from the strategic cross-boundary evidence base are an issue to be considered in assessing the soundness of that plan.</p> <p>Although the Leicester and Leicestershire authorities continue to work on the SGP, there has been considerable slippage in the timetable for the preparation of this document which has meant many of the authorities within the HMA have either submitted or are about to submit their plans before the SGP is adopted. This is obviously an unsatisfactory position for the HMA, particularly as Leicester City has identified housing needs which cannot be met within its own boundaries. In the case of Leicester City, the level of unmet housing need is likely to be considerable. In fact, it is anticipated that the next stage of consultation</p>	<p>In addition, all local authorities within the Leicester and Leicestershire HMA have been working together on the production of the Leicester and Leicestershire Strategic Growth Plan. The relationship of the Strategic Growth Plan to Local Plans is set out at paragraph 1.5.2 of the Local Plan, which states <i>'although the Strategic Growth Plan deals with the time period up to 2050, it treats the period's pre 2031 and post 2031 very differently. Pre 2031, the housing and employment Objectively Assessed Needs for the Leicester and Leicestershire HMA, set out within the HEDNA, will be delivered through each of the local authorities individual Local Plan's. The Strategic Growth Plan therefore focuses on the period post 2031, for which it identifies a 'notional housing need'. It recognises that for this period there are no reliable estimates of population growth or household change, thus it estimates future housing needs by projecting forwards the annual figures set out within the HEDNA'.</i></p> <p>The Council will continue to work closely with all authorities within the Leicester and Leicestershire Housing Market Area, not only in providing the required number of homes up to 2031, but post 2031 in line with the Strategic Growth plan. In Local Plan paragraphs 1.5.6 to 1.5.7 the Council has committed to a review of the Local Plan no later than 5 year from adoption (consistent with national policy and guidance) and has also set out what would trigger an earlier review. The Council considers that the commitment shown in paragraphs 1.5.6 to 1.5.7 illustrate the Council's intentions in an appropriate manner. However, the Council would not object if the wording was required to be set out within a new Local Plan policy.</p>
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		<p>on the SGP will not take place until early 2018, so adoption of the document is unlikely to take place until late early summer 2018 or later, well after the submission of the OWLP.</p> <p>If Local Plans in the Leicester and Leicestershire HMA are adopted prior to completion of the SGP, even with early review policies included within those plans, it will still take the authorities a considerable length of time to prepare plans which are in accordance with the SGP and deal with the issue of unmet housing need across the HMA. This means that the real housing needs of those unable to access the housing market will continue to go unmet for many years, a situation that the current Government consider unacceptable.</p> <p>The OWLP refers to a new Memorandum of Understanding (MOU) which is being prepared by the Leicester and Leicestershire authorities and is likely to be completed in January 2018. With unmet need having already been identified within the HMA, the distribution of this unmet need will need to be addressed through both the SGP and updated MOU. There are therefore still considerable uncertainties regarding the distribution of housing growth across the HMA and Oadby and Wigston may still be required to accommodate a proportion of the identified unmet housing need. As the OWLP is being advanced before these issues have been fully resolved, this is considered to be an unsound basis upon which to prepare the Local Plan.</p>	
18.12.17	Gladman	<p>Sustainability Appraisal</p> <p>Under Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of</p>	<p>Comment noted.</p> <p>The SA Report has been undertaken as a statutory requirement of the Planning and Compulsory Purchase Act 2004. In line with the PPG the document has been prepared as a joint SA/SEA process. It is therefore</p>

		<p>Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.</p> <p>The Council need to ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Council's decision making and scoring should be robust, justified and transparent.</p> <p>Gladman remind 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 or being subjected to legal challenge.</p>	<p>required to address the requirements of the SEA Regulations (Art. 5 and Annex I) which are detailed in Table 1.1 of the SA Report. The table shows where the requirements of these regulations have been met in the SA Report.</p> <p>Chapter 6 of the SA Report has presented the findings in relation to the reasonable alternative Policy Options for the Local Plan. The findings have been reached in line with the methodology for the SA which is presented in Chapter 2 of the SA Report and was applied in a consistent and transparent manner throughout the process. The detailed matrices showing the justifications for each of the scores given in relation to the SA objectives against which each policy option has been considered are presented in Appendix 7. The Council's reasons for selecting or rejecting policy options are presented in Appendix 8. The detailed SA matrices for the policies taken forward in the Pre-Submission version of the Local Plan are presented in Appendix 9 while a summary of the likely sustainability effects of the these policies are presented in Chapter 4. As such it has been demonstrated that the SA Report meets the requirements of the Regulations and SEA Directive.</p>
18.12.17	Gladman	<p>OBJECTIVELY ASSESSED HOUSING NEED (OAN)</p> <p>Background The process of undertaking an OAN is clearly set out in the Framework, principally in §14. §47, §152 and §159 and should be undertaken in a systemic and transparent way to ensure that the plan is based on a robust evidence base.</p> <p>The starting point for this assessment requires local planning authorities to have a clear understanding of housing needs in their area. This involves the</p>	Comment noted.

		<p>preparation of a Strategic Housing Market Assessment (SHMA) working with neighbouring authorities where housing markets cross administrative areas as detailed in §159 of the Framework. The Framework goes on to set out factors that should be included in a SHMA including identifying:</p> <p>“the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:</p> <ul style="list-style-type: none"> • Meets household and population projections taking account of migration and demographic change; • Addresses the need for all types of housing including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and • Caters for housing demand and the scale of housing supply necessary to meet this demand.” <p>Key points that are worth noting from the above are that the objective assessment should identify the full need for housing before the Council consider undertaking any process of assessing the ability to deliver this figure. In addition, §159 specifically relates to catering for both housing need and housing demand within the authority area. It is also worth pointing out that any assessment of housing need and demand within the SHMA must also consider the following factors; falling household formation rates, net inward migration, the need to address the under provision of housing from the previous local plan period, the results of the Census 2011, housing vacancy rates including the need to factor in a housing vacancy rate for churn in the housing market, economic factors to ensure that</p>	
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		<p>the economic forecasts for an area are supported by sufficient housing to deliver economic growth, offsetting a falling working age population by providing enough housing to ensure retiring workers can be replaced by incoming residents, addressing affordability and delivering the full need for affordable housing in the area.</p> <p>Of particular importance is the need to consider market signals. The consideration of market signals is one of the core planning principles considered in §17 of the Framework, which states:</p> <p>“Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.”</p> <p>Of critical importance is what the Framework goes on to say in §158 in the section discussing Plan Making. It states here that:</p> <p>“Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.”</p> <p>Tackling market signals are therefore at the very core of what the Framework is trying to achieve in promoting sustainable development and boosting the supply of housing land.</p> <p>The Planning Practice Guidance (PPG) gives further explanation to what the Framework means with regards to market signals, and sets out in a range of</p>	
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		<p>paragraphs the way in which local planning authorities should go about factoring in relevant market signals in arriving at their OAN. §19 and §20 of the PPG gives guidance on what market signals should be taken into account and how plan makers should respond to these market signals. The below extract identifies some particularly pertinent points:</p> <p>“The housing need number suggested by household projections (the starting point) should be adjusted to reflect the appropriate market signals, as well as other market indicators of the balance between demand for and supply of dwellings. Prices of rents rising faster than national/local average may well indicate particular market undersupply relative to demand.”</p> <p>The paragraph goes on to indicate that these factors would include, but should not be limited to land prices, house prices, rents, affordability, rates of development and overcrowding. However, given what the Framework says at §17, quoted above, it seems clear that particular consideration should be given to affordability.</p> <p>In order to consider how market signals should be taken forward §20 identifies some key concepts: “Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas; and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.”</p> <p>It is therefore clear that where market signals are apparent (in any of the indicators assessed) there is an absolute and clear direction that an upward adjustment</p>	
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		<p>to housing numbers is required. It is also clear that both the level of change and the rates of change are considerations and that local planning authorities need to carefully benchmark themselves against other areas. This should not simply be a case of considering neighbouring authorities but should look at, as well as these, local authorities on a national basis, if the demographic and economic indicators are relevant. Gladman are firmly of the view that considering comparisons purely against neighbouring authorities is not sufficiently robust and does not address the underlying issues which both the Framework and the PPG are trying to tackle with regard to housing.</p> <p>What is of further importance when considering these issues is the period of time analysed when considering both relative and absolute change. It has become apparent in our consideration of a number of plans that many local planning authorities choose to look at periods of time which are not fully representative of the depth of the housing crisis which we are currently within.</p> <p>Gladman is of the view that local planning authorities must take a long-term view when considering affordability and consider the relative and absolute change over a long term 15-20 year period, which coincides with the normal time span of a Local Plan. Authorities should assess as a constituent part of their OAN, how they can improve affordability over the life time of a plan to a point where affordability is more in line with average earnings and affordable mortgage lending rates. They should assess a level of housing over the 15-20 year plan period which would enable this step change and consider its deliverability in the plan. Only through planning for significant housing growth can local authorities realistically tackle market signals in the way advocated by the PPG and tackle the</p>	
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		<p>affordability and housing crisis.</p> <p>The need to identify the full OAN before considering any issues with the ability of a Local Planning Authority to accommodate that level of development has been confirmed in the High Court. Most notably in Solihull Metropolitan Borough Council v (1) Gallagher Homes Limited (2) Lioncourt Homes Limited where it was considered that arriving at a housing requirement was a two-stage process and that first the unconstrained OAN must be arrived at. In the judgment, it was stated:</p> <p>“The NPPF indeed effected a radical change. It consisted in the two-step approach which paragraph 47 enjoined. The previous policy’s methodology was essentially the striking of a balance. By contrast paragraph 47 required the OAN [objectively assessed need] to be made first, and to be given effect in the Local Plan save only to the extent that that would be inconsistent with other NPPF policies. [...] The two-step approach is by no means barren or technical. It means that housing need is clearly and cleanly ascertained. And as the judge said at paragraph 94, “[h]ere, numbers matter; because the larger the need, the more pressure will or might be applied to [impinge] on other inconsistent policies”.</p> <p>Therefore, following the exercise to identify the full OAN for housing in an area:</p> <p>“Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the</p>	
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		<p>impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate.” (NPPF §152)</p> <p>This statement clearly sets out that local planning authorities should seek to deliver the full OAN and that this should be tested through the evidence base. Only where the evidence shows that this is not achievable, should they then test other options to see if any significant adverse impacts could be reduced or eliminated by pursuing these options. If this is not possible then they should test if the significant adverse impacts could be mitigated and where this is not possible, where compensatory measures may be appropriate.</p> <p>The final stage of the process is outlined in §14 and involves a planning judgement as to whether, following all of the stages of the process outlined above:</p> <p>“Local Plans should meet OAN, with sufficient flexibility to adapt to rapid change, unless:</p> <ul style="list-style-type: none"> • any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or • specific policies in this Framework indicate development should be restricted.” <p>It is also worth noting that the final part of this sentence refers to footnote 9 of the Framework which sets out the types of policies that the Government consider to be restrictive. These include:</p> <p>“sites protected under the Birds and Habitat Directive (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding</p>	
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18.12.17	Gladman	<p>Policy 1 – Presumption in Favour of Sustainable Development</p> <p>Gladman are supportive of the inclusion of the policy on Sustainable Development. The ethos of sustainable development is key to assessing planning proposals and is the golden thread running through the NPPF.</p> <p>However, Gladman object to the working of the final paragraph of Policy 1 as it is written in a negative fashion and does not reflect the positive nature of the Framework. The whole of the final paragraphs should be reworded to reflect the model policy on Sustainable Development, emphasizing the positive nature of the Framework.</p> <p>The final paragraph should therefore read:</p> <p>“Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:</p> <p>1. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National</p>	<p>Comment of support noted.</p> <p>The Council would not object to the wording of the final paragraph of Local Plan Policy 1 Presumption in Favour of Sustainable Development being reworded subject to the intention / objective of the policy remaining the same.</p>

		Planning Policy Framework taken as a whole; or 2. Specific policies in that Framework indicate that development should be restricted.	
18.12.17	Gladman	<p>Policy 2 – Spatial Strategy for Development within the Borough</p> <p>Gladman support the Spatial Strategy as set out within Policy 2, especially the identification of the Direction for Growth to the South East of Wigston. The area of growth will directly support the main town centre of Wigston and will contribute towards improvements to the local highway network.</p> <p>In distributing the growth outlined in the Plan, the Council should be mindful that to maximize 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.</p> <p>The Plan introduces an element of flexibility into the housing supply to ensure that the housing requirement is achieved or surpassed. This is to be welcomed. However, the deliverability of the sites identified as contributing to this flexibility need to be carefully considered. The Council identify that an additional 300 units could come from Phase 3 of the Wigston Direction for Growth. These units, whilst providing some flexibility, are unlikely to be delivered in the short term as they form part of Phase 3 of the strategic allocation. If therefore, the Council identify a problem with housing delivery that needs addressing in the short</p>	<p>Comment of support noted.</p> <p>The Council considers that the level of development proposed in the Local Plan is sufficient to meet the needs of the Borough up to 2031. However, as suggested in the representation, the Council has allowed a level of flexibility (a buffer) within the Plan to negate any potential delivery issues on allocated sites, as well as potentially accommodate a small proportion of Leicester City's unmet need.</p> <p>The Council is confident that the levels of development proposed will come forward within the Plan period as expected and illustrated within the Local Plan housing trajectory. As with any trajectory, the further into the future it forecasts, the (potentially) less reliable it becomes. In the short to medium term the Council are confident that the trajectory is accurate and robust and the 'buffer' is unlikely to be required.</p>

		term, in order to maintain a 5 year housing land supply, the flexibility set out in the Plan (para 4.2.11) is unlikely to help to resolve this issue. It is therefore considered, that further flexibility is required in the OWLP through the identification of small scale sites, that are in line with the Spatial Strategy, but which can be delivered in the short term to plug any gap in the 5 year housing land supply.	
18.12.17	Gladman	<p>Policy 4 – Creating a Skilled Workforce</p> <p>In relation to Policy 4 Gladman would point out that the requirement to provide educational facilities is a key part of the Framework. Paragraph 72 states that local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement. This should involve working closely with developers over schemes to assess the best possible solution to educational provision taking account of the capacity of all schools in the area that serve the development, the distance pupils travel to access schools and the most efficient and sustainable use of existing educational resources before requiring the provision of new facilities. Viability should also be a key consideration to ensure schemes are not prevented from being brought forward because of the need for significant infrastructure contributions. Gladman remind the Council that the lack of educational provision should not be used a reason for refusal as local planning authorities should work positively with the development industry to identify suitable and deliverable solutions to these issues.</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The Council will work closely with an applicant and Leicestershire County Council Education Department to seek appropriate contributions towards education facilities should there be an identified need to do so. The Council would only seek a contribution should the education authority consider there a justified reason to do so. It should be noted that Leicestershire County Council calculate relevant contributions via their adopted Planning Obligations Policy.</p>
18.12.17	Gladman	<p>Policy 6 – High Quality Design and Materials</p> <p>Gladman object to Policy 6 as to require the highest standards of design and highest quality of materials is overly onerous and difficult to evidence. The Policy should be written more flexibly requiring development</p>	<p>Comment noted.</p> <p>The Council considers that the reference to the highest standards of inclusive design and use of the highest quality materials for all new development is appropriate. The Council is aware that the NPPF</p>

		to meet high quality standards of design using high quality materials.	<p>suggests that it is important to plan positively for the achievement of high quality and inclusive design for all development; it seeks to strive further in design terms.</p> <p>The Council however would have no objection to the policy wording being amended, for example 'highest' being replaced with 'high'.</p>
18.12.17	Gladman	<p>Policy 8 – Green Infrastructure</p> <p>Gladman object to Policy 8 on Green Infrastructure as it requires all new development to seek a net gain in Green Infrastructure provision. Some very small developments may not be able to achieve this requirement given their scale. The Policy should therefore be amended to state that all new development should seek a net gain in Green Infrastructure where appropriate.</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>National Planning Policy Framework paragraph 114 states that local planning authorities should set out a strategic approach in their Local Plan, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.</p> <p>The Council considers that Local Plan Policy 8 Green Infrastructure supports the policy objective of the NPPF.</p>
18.12.17	Gladman	<p>Policy 11 – Housing Choices</p> <p>Gladman support Policy H11 as it seeks to encourage the development of specialist accommodation for older people including both extra care and sheltered accommodation.</p>	<p>Comment of support noted.</p>
18.12.17	Gladman	<p>Policy 12 – Housing Density</p> <p>Gladman object to the prescriptive nature of Policy 12 and the extremely high densities which are expected on new residential schemes without any flexibility exercised.</p> <p>Gladman consider that in order to introduce an element of flexibility to deliver a wide variety of units suitable for a range of house builders and occupiers, the term 'at least'; should be removed from the wording of each</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>Within the Council's Local Plan Preferred Options Consultation document, a two tiered approach to housing density was promoted. In summary, the approach sought 50 dph within town centre locations and 40 dph for all other locations. Having considered representations relating to dph, the Council amended the Local Plan to promote a three tiered approach. 50 dph was sought in town centre locations, 40dph in the</p>

		<p>of the density requirement clauses to be replaced by a dwelling range.</p> <p>Therefore, instead of stating that on proposals outside of the Town Centre boundary of Wigston or district centre boundaries of Oadby and South Wigston, but within the Leicester PUA, a density of at least 40 dwellings per hectare (dph) will be required, the Policy should state that a density of 35 to 45 dph will be required.</p> <p>This would give sufficient comfort to the Council to ensure that densities reflect the constrained and urban nature of the borough, whilst allowing sufficient flexibility for design issues to be considered and addressed and a variety of dwellings to be provided to best meet the needs of the local population.</p>	<p>rest of the Leicester PUA and 30 dph elsewhere.</p> <p>In producing the Local Plan the Council took account of the Department for Communities and Local Governments 'Fixing our broken housing market' white paper (February 2017) and the HM Treasury Autumn Budget 2017, both of which encourage local authorities to build at higher densities in appropriate locations.</p> <p>The Council considers that the three tiered approach, relating to the location of development proposals is appropriate for the Borough, taking account of its predominately urban compact form.</p>
18.12.17	Gladman	<p>Policy 14 - Self Build and Custom Build</p> <p>Policy 14 requires housing developments over 11 dwellings to provide land for self-build and custom build dwellings to help meet identified local demand. Whilst the concept of Self Build and Custom Build Housing is supported, Gladman have concerns regarding Policy 14 as it is written as the inclusion of plots on large scale sites does not add to the supply of houses overall (it merely changes the housing mix from one product to another). It is also difficult to assess how it will be implemented given issues around working hours, site access, health and safety etc. that are associated with large scale development sites. The percentage of provision on sites should also be determined on detailed evidence of need which the Council has not yet produced and the provision of these plots should also be subject to viability testing</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>To ensure that the Council is acting positively and proactively it does not consider it appropriate to remove Local Plan Policy 14 Self Build and Custom Build. It should be noted that Local Plan Policy 14 Self Build and Custom Build does not <u>require</u> the provision of custom and / or self build, it seeks to <u>encourage</u> provision of plots. Therefore if the provision of Self Build and Custom Build plots (through the planning application process) had significant negative impacts on the viability of development proposals, the Council would not require its provision.</p> <p>The Policy allows the flexibility for the Council to work with an applicant on a case by case basis to seek / encourage the provision of self build and custom build housing plots. For this reason the Council considers that it is appropriate not to include the provision of self</p>

			build and custom build as part of the Local Plan Whole Plan Viability evidence base documentation.
18.12.17	Gladman	<p>Policy 20 – Wigston Direction for Growth Area</p> <p>Gladman support the allocation of further land for an additional 600 dwellings at the Wigston Direction for Growth area for “phase 2” development. Gladman consider the Direction for Growth Area to be the most sustainable location in the district for new development, as a result of its proximity to the town centre and public transport links into Leicester City.</p>	Comment of support noted.
18.12.17	Gladman	<p>Policy 40 – Culture and Historic Environment Assets</p> <p>Gladman do not consider that Policy 40 fully reflects the guidance which is set out in the Framework. The Policy should be amended to reflect the comments below to ensure that it is fully consistent with current guidance.</p> <p>Paragraphs 132 to 134 of the Framework relate specifically to designated heritage assets and highlight that the more important the asset the greater the weight that should be attached to it. The policies in the Local Plan therefore need to make such a distinction so as to ensure they are consistent with the Framework.</p> <p>The Framework states that if the harm to a heritage asset is deemed to be substantial then the proposal needs to achieve substantial public benefits to outweigh that harm. If the harm is less than substantial, then the harm should be weighed against the public benefits of the proposal including securing its optimum viable use. The policies in the Local Plan should therefore make a distinction between the two tests included in the Framework for designated heritage assets to ensure they are sound.</p> <p>Paragraph 135 of the Framework relates specifically to</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The Council is in agreement that paragraphs 132 to 134 of the NPPF relate to designated heritage assets. However it should be noted that the Council considers that paragraphs 126 to 130 of the same document relate to all heritage assets. Designated heritage assets are protected under national policy and guidance, therefore the Council does not consider repeating this in the Local Plan appropriate. Local Plan Policy 40 seeks the safeguarding, conservation or enhancement of both designated and non designated assets. As NPPF states, heritage assets are irreplaceable resource that should be conserved in a manner appropriate to their importance. The Council considers that all heritage assets hold local importance and should be safeguarded and conserved.</p>

		<p>non-designated heritage assets and the policy test that should be applied in these cases is that a balanced judgment should be reached having regard to the scale of any harm and the significance of the heritage asset. Once again, policies in the Local Plan need to reflect this guidance.</p>	
18.12.17	Gladman	<p>Policy 42 – Green Wedges</p> <p>Policy 42 relates to green wedge designations which are not referred to in national policy, however they are not in of themselves inconsistent with the Framework. Notwithstanding this, the boundaries of green wedges are often historic in nature due to them having been formulated alongside the now outdated evidence of development needs that underpinned previous local plans. They also often cross administrative boundaries due to them originally having been 'broadly defined' within former county-wide structure plans. The green wedges within Leicester and Leicestershire therefore continue to be a strategic issue to be considered through the Duty to Cooperate and the Strategic Growth Plan to ensure that development needs can be met in full across the HMA.</p>	Comment noted.
18.12.17	Gladman	<p>Policy 43 – Countryside</p> <p>Gladman wish to point out that impact on the landscape is one factor that should be considered by the decision maker when determining any planning proposal and ultimately it is a balance of the harm of development against the benefits. It is only where the harm significantly and demonstrably outweighs the benefits should planning permission be refused.</p> <p>Policy 43 states that development should not adversely affect landscape, wildlife, the ecological, geological, environmental, archaeological, or historic resources of the site and the surrounding area. However, it should</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The Council considers that the Policy wording of Local Plan Policy 43 Countryside allows sufficient flexibility for planning balance in decision making. The Policy allows for some forms of required development in Countryside locations and states that any development proposal causing adverse impacts will only permitted where there is justifiable need which outweighs the impacts.</p>

		be recognised that any adverse impacts that a proposal has on these issues should be factored into the planning balance when making a decision rather than it being a sole reason for refusing any application.	
18.12.17	Gladman	<p>Policy 44 – Landscape and Character</p> <p>Similar to the comments set out above in relation to Policy 43, Gladman also object to Policy 44. The Policy as currently set out, seeks to conserve and enhance the distinctive landscapes in the borough. Impact on the landscape is just one factor that should be considered by the decision maker when determining any planning proposal and ultimately it is a balance of the harm of development against the benefits. It is only where the harm significantly and demonstrably outweighs the benefits should planning permission be refused. The Policy should therefore be reworded to properly reflect the guidance set out in the Framework at paragraphs 109 and 113.</p> <p>Paragraph 109 of the Framework seeks to contribute to and enhance the natural and local landscape whilst protecting and enhancing valued landscapes. Paragraph 113 goes on to set out that distinctions should be made between the hierarchy of international, national and locally designated sites so that protection is commensurate with their status.</p> <p>In order to have regard to national policies and guidance, it is not enough to simply seek to protect countryside from development for its own sake; rather, in order to warrant protection, it must at the very least, exhibit some demonstrable physical attributes which elevate its importance above simply being an area of undeveloped countryside.</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>Local Plan Policy 44 Landscape and Character does not seek to protect countryside from development for its own sake. The policy states that all development proposals within the Borough will be considered against the need to conserve and enhance the distinctive landscapes of the Borough. This reflects the policy objective of NPPF paragraph 109.</p> <p>In addition, Local Plan Policy 44 Landscape and Character is seeking to ensure that all development proposals reflect the prevailing quality, character and landscape features such as settlement patterns, important views, open spaces and significant natural habitats. The policy seeks development that is not only sustainable but is in keeping with the area in which it is situated. The Council considers that this approach is appropriate due to the diverse and distinct character areas of the Borough area.</p>
18.12.17	Gladman	Policy 45 – Local Green Space	Comment noted.

		<p>Gladman take this opportunity to remind the Council of the tests which need to be met when seeking to designate Local Green Space (LGS).</p> <p>Paragraph 77 of the Framework sets out the following in terms of when it is appropriate or not to designate land as a LGS.</p> <p>“The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:</p> <ul style="list-style-type: none"> a. Where the green space is in reasonably close proximity to the community it serves; b. Where the green area is demonstrably special to a local community and holds particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c. Where the green area concerned is local in character and is not an extensive tract of land.” <p>The Planning Practice Guidance (PPG) provides further guidance on LGS designations including paragraph ID. 37-015-20140306,</p> <p>“There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgement will inevitably be needed. However, paragraph 77 of the National Planning Policy Framework is clear that Local Green Space Designation should only be used where the green area concerned is not an extensive tract of land. Consequently, blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new are</p>	<p>The Council is aware of the criteria set out within the NPPF. As illustrated within the Local Green Space Assessment the Council assessed each of the land areas submitted to the Council by the local community. The land areas that were considered to have met the criteria as expressed within the NPPF (paragraph 77) were then proposed for Local Green Space designation on the Council’s Local Plan Adopted Policies Map.</p>
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		of Green Belt by another name.”	
18.12.17	Gladman	<p>Monitoring Framework</p> <p>The Council has not included, within the Monitoring Framework section of the Plan, a policy relating to an early review of the Local Plan. This is considered to be a fundamental omission from the Plan and one which could make the Plan unsound as it stands.</p> <p>The Council highlight the issues relating to the review of the Local Plan in paragraphs 1.5.6 and 1.5.7 of the Local Plan which state that the Council will commence a review of the Plan no later than five years from the adoption of this Plan or potentially earlier if the Plan is found not to be delivering its targets, there is evidence of unmet housing need which cannot be met in the other authorities within the HMA or the post 2031 strategy set out in the SGP comes forward at a faster rate than currently anticipated. This approach is considered to be inadequate for a number of reasons.</p> <p>Firstly, all Local Plans should be reviewed every five years in line with Government guidance. Therefore, the statement does no more than re-iterate current guidance. Secondly, in order to carry full weight and to ensure that any review is carried out in accordance with this intention, any review mechanism should be included within the Plan as a Policy.</p> <p>The statements included in paragraph 1.5.6 also contain no firm commitment on the timing and completion of the Local Plan review. The Policy refers to commencing a review within 5 years of the adoption of the Plan but there is no specific timeframe for completion of the review. This means that the Council has no specific imperative to do anything but start the review process which may, under the current policy,</p>	<p>Comment noted.</p> <p>The Council will continue to work closely with all authorities within the Leicester and Leicestershire Housing Market Area, not only in providing the required number of homes up to 2031, but post 2031 in line with the Strategic Growth plan. In Local Plan paragraphs 1.5.6 to 1.5.7 the Council has committed to a review of the Local Plan no later than 5 year from adoption (consistent with national policy and guidance) and has also set out what would trigger an earlier review. The Council considers that the commitment shown in paragraphs 1.5.6 to 1.5.7 illustrate the Council’s intentions in an appropriate manner. However, the Council would not object if the wording was required to be set out within a new Local Plan policy.</p> <p>In December 2017, the Council approved the Joint Statement of Co-operation Relating to Objectively Assessed Need for Housing (November 2017). The joint statement sets out that up to 2031 the local authorities within the Leicester and Leicestershire Housing Market Area have sufficient capacity to meet the Leicester and Leicestershire Housing Market Area OAN for housing.</p> <p>The statement sets out that the theoretical total housing capacity of the Leicester and Leicestershire Housing Market Area exceeded the OAN for housing by over 100,000 new homes. In addition, all local authorities within the Leicester and Leicestershire HMA have been working together on the production of the Leicester and Leicestershire Strategic Growth Plan. The relationship of the Strategic Growth Plan to Local Plans is set out at paragraph 1.5.2 of the Local Plan, which states <i>'although the Strategic Growth Plan deals with</i></p>

		<p>never be completed. There is of course no definition of the term 'commenced' which could, in its simplest terms, mean beginning the collection of evidence. With a fair wind, it would be at least 3 years before any Local Plan review would be adopted. Added to the potential 5 years for the Council to commence a review, this could lead to eight years before a Local Plan review is adopted.</p> <p>It is therefore suggested that in order to be as effective as possible, the review mechanism should be contained in a policy within the Monitoring Framework section and should be far more robust and set within a definitive timescale.</p> <p>Any review clause should therefore be based upon an end date which is in the control of the LPA i.e. the date of submission of the Local Plan review. This approach would provide certainty that any need to accommodate unmet housing needs from other authorities within the Leicester and Leicestershire HMA would be addressed in an expeditious manner. Given that Leicester City has already identified that it will have unmet housing needs and will need help from other HMA partners to deliver its unmet need up to 2031 (see paragraph 4.2.5 of the OWLP), this approach is even more essential.</p> <p>Review policies have to be treated with a degree of caution as there are examples of other authorities where, despite their Local Plans including review policies, significant delays associated with Local Plan progress have occurred. This has included Local Plans in the following locations as examples:</p> <p>(1) Wiltshire Core Strategy (2015) - the adopted Core Strategy states that a partial review will be adopted in 2016. No significant progress made to date.</p>	<p><i>the time period up to 2050, it treats the period's pre 2031 and post 2031 very differently. Pre 2031, the housing and employment Objectively Assessed Needs for the Leicester and Leicestershire HMA, set out within the HEDNA, will be delivered through each of the local authorities individual Local Plan's. The Strategic Growth Plan therefore focuses on the period post 2031, for which it identifies a 'notional housing need'. It recognises that for this period there are no reliable estimates of population growth or household change, thus it estimates future housing needs by projecting forwards the annual figures set out within the HEDNA'.</i></p> <p>Taking account of the above, the Council does not consider it necessary to commit to an early review of the Local Plan upon adoption of the Leicester and Leicestershire Strategic Growth Plan due to the growth plans strategy being in place from the 2031 time period.</p> <p>In addition it should be noted that the Department for Communities and Local Government (DCLG) has specified the introduction of regulations that require local authorities to review Local Plans at least every five years. DCLG suggest (in a letter dated 21st December 2017) that, every 5 years from adoption, authorities must carry out an assessment of whether the Plan remains relevant and effectively addresses the needs of the local community or whether policies need updating. Depending on the assessment outcome, the local authority will publish their reasons for not updating policies, or update their Local Development Schemes to set out the timetable for updating their Plan (and then should update their Plan). The Council is not aware of any recent DCLG statement that suggests that local authorities should set out Local Plan review completion / end dates within its Local Plan.</p>
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		<p>(2) Staffordshire Moorlands Core Strategy (2014) - Policy SS2 states that the Council will undertake and complete an early and comprehensive review of the Core Strategy by 2016 – No significant progress has been made to date.</p> <p>These examples go to highlight the importance of a suitably worded policy which compels the LPA to complete a review for submission by a specific timeframe. This will ensure that any unmet housing needs are addressed as quickly as possible in line with the Government's commitment to tackling the housing crisis.</p> <p>Gladman consider that the wording of the review mechanism therefore needs to be clear, easily understandable, effective and be enforceable. This issue was discussed at length at the North West Leicestershire Local Plan Examination with the Inspector keen to ensure that any review policy was meaningful.</p> <p>North West Leicestershire have subsequently adopted their Local Plan including wording for the local plan review mechanism. Although Gladman still have a number of concerns with the review policy as it is now written, it is fundamentally a policy that is clear, understandable and sets a number of triggers and targets which means it will be "effective". The wording of the review mechanism now contains a start date, an end date that is in the control of the Local Planning Authority and sets out the consequences of failing to meet the target dates.</p> <p>Given the recognition that there will be unmet housing need within the HMA and the fact that all Leicester and Leicestershire authorities are committed to the preparation of a Strategic Growth Plan (SGP) to address</p>	
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		<p>the spatial distribution of housing and employment needs across the HMA, it is essential for the review mechanism to make reference to the SGP as the adoption of this document should be the trigger for the commencement of the OWLP review. It is Gladman’s opinion that the review mechanism in the OWLP, and indeed all Leicester and Leicestershire Local Plans should mirror that in the North West Leicestershire Local Plan with the amendment to make specific reference to the SGP. This will ensure that all of the Leicester and Leicestershire authorities are aligned in their approach to addressing the outcomes of the SGP and that all Local Plan reviews would be triggered on a common basis in line with the agreement of the Memorandum of Understanding.</p> <p>The OWLP Review Mechanism should therefore read:</p> <p>Oadby and Wigston Borough Council are committed to working with all Leicester and Leicestershire Local Planning Authorities on the preparation of the Strategic Growth Plan which is anticipated will be adopted in [insert anticipated adoption date]. Once adopted, Oadby and Wigston Borough Council will commit to the delivery of the Strategic Growth Plan through the signing of a Memorandum of Understanding with all the Leicester and Leicestershire authorities. The Strategic Growth Plan will then provide the fundamental basis for the review of the Oadby and Wigston Borough Local Plan and the preparation of the subsequent Local Plans for all other Leicester and Leicestershire authorities. The Borough Council will commence a review of this Local Plan (defined as being publication of an invitation to make representations in accordance with Regulation 18 of the Town and Country Planning (Local Planning)(England) Regulations (2012)) within 3 months of the adoption of this Local Plan. The Plan</p>	
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		Review will be submitted for Examination within two years from the commencement of the review. In the event that the reviewed plan is not submitted within two years then this plan will be deemed out of date.	
18.12.17	Harborough District Council	<p><u>4.2.5 Housing Growth</u></p> <p>HDC welcomes the confirmation that the Borough is able to meet its own OAN and will not be reliant on any other local authority within the Leicester and Leicestershire HMA.</p>	Comment of support welcomed.
18.12.17	Harborough District Council	<p><u>4.2.11 Additional housing land</u></p> <p>HDC supports the identification of land to deliver approximately 400 additional houses to cover any delivery issues on allocated sites and to make a small contribution to meeting Leicester's unmet need (the scale of which has not yet been declared).</p>	Comment of support welcomed.
18.12.17	Harborough District Council	<p><u>4.2.21 Town Centre Growth</u></p> <p>HDC supports the principle set out in the spatial strategy that the town centres will be the focus for retail growth.</p>	Comment of support welcomed.
18.12.17	Harborough District Council	<p><u>7.2.14 Oadby Cemetery Allocation</u></p> <p>HDC supports the proposed extension of the previously allocated cemetery site.</p>	Comment of support welcomed.
18.12.17	Harborough District Council	<p><u>Policy 46 Infrastructure and Developer Contributions</u></p> <p>The addition of the following wording is suggested in the final sentence after: 'Any development that has an impact within the Borough . . .', suggest adding 'or outside the Borough'. This would mirror the wording of the Harborough Proposed Submission Local Plan Policy IN1 Infrastructure provision which refers to ' . . . whether within Harborough District or outside'.</p>	<p>Comment noted. The Council is proposing minor modifications to the Local Plan from the comments received from Harborough District Council for the reasoning set out below.</p> <p>To ensure that both the Borough's Local Plan and Harborough District's Local Plan hold a consistent approach to infrastructure mitigation and developer contributions, the following wording will be added.</p> <p><i>'Any development that has an impact within the</i></p>

			<i>Borough (or neighbouring authority areas) will be required to contribute towards the provision of and / or financial contribution towards necessary mitigation infrastructure measures'.</i>
18.12.17	Home Builders Federation (HBF)	<p>Duty to Co-operate The Duty to Co-operate (S110 of the Localism Act 2011 which introduced S33A into the 2004 Act) requires the Council to co-operate with other prescribed bodies to maximise the effectiveness of plan making by constructive, active and on-going engagement. The high level principles associated with the Duty are set out in the National Planning Policy Framework (NPPF) (paras 156, 178 – 181) and in twenty three separate paragraphs of the National Planning Practice Guidance (NPPG). In determining if the Duty has been satisfactorily discharged it is important to consider the outcomes arising from the process of co-operation and the influence of these outcomes on the Local Plan. One of the required outcomes is the delivery of full objectively assessed housing needs (OAHN) for market and affordable housing in the housing market area (HMA) as set out in the NPPF (para 47) including the unmet needs of neighbouring authorities where it is reasonable to do so and consistent with sustainable development (NPPF para 182).</p> <p>The Borough is entirely within the Leicester Principal Urban Area (PUA) and is bordered by three neighbouring authorities of Leicester City Council, Blaby and Harborough District Councils. It has been determined that Oadby & Wigston Borough Council is a constituent part of the Leicester & Leicestershire HMA together with Leicester City Council, Blaby, Charnwood, Hinckley & Bosworth, North West Leicestershire, Melton and Harborough District Councils. The Leicester & Leicestershire HEDNA 2017 identifies an OAHN for the HMA of 4,829 dwellings per annum between 2011 –</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>Throughout the production of the Local Plan, the Council has met the Duty to Cooperate. All local authorities within the Leicester and Leicestershire Housing Market Area (HMA) have good working relationships and a common goal, which is meeting the HMA's Objectively Assessed Need (OAN) in both housing and employment. The Duty to Cooperate Statement document illustrates how the Council has met the Duty to Cooperate throughout Local Plan production.</p> <p>The Council would like to highlight that it has clarified and set out how it is to meet its OAN for both housing and employment over the Plan period up to 2031. The Council <u>does not</u> have a declared unmet need for housing or employment.</p> <p>In addition to the Council meeting its own OAN for housing, the Local Plan (at paragraph 4.2.11) illustrates a 'buffer' of new additional homes. This buffer would negate any potential delivery issues on allocated sites, as well as help fulfil a proportion of Leicester City's declared unmet need.</p> <p>It should be noted that the Borough has worked proactively and positively to meet its OAN for housing, particularly as it has been a huge 'step' change. The Local Plan period target of 2960 over the 20 year plan period is a 60 per cent increase on the Core Strategy target of 1800 new homes (over a similar 20 year</p>

		<p>2031 or 4,716 dwellings per annum between 2011 – 2036.</p> <p>It is understood that Leicester City Council and Oadby & Wigston District Council have both formally written to other HMA authorities declaring unmet needs amounting to as at February 2017 a shortfall of 8,834 dwellings up to 2031 in Leicester and as at March 2017 161 dwellings up to 2031 or 1,076 dwellings up to 2036 in Oadby & Wigston. Although the Council now states in the pre submission Local Plan that its own needs will be meet in full. The Council should clarify whether or not the Borough’s own OAHN will be meet in full before the Local Plan is submitted for examination.</p> <p>Currently there is no Duty to Co-operate Statement. It is understood that a Statement of Co-operation and Memorandum of Understanding (MoU) will be prepared and signed by the HMA authorities (see para 1.5.3) but the absence of such documents at the time of the pre submission consultation is a serious omission. It could be considered that the Council has co-operated on an on-going basis with its neighbouring authorities in the Leicester & Leicestershire HMA thereby complying with the legal requirements of the Duty the outcomes from that process in particular meeting unmet needs in the HMA are not yet concluded which is an unsound basis on which to prepare a Local Plan. The Local Plan should be based on a strategy which seeks to meet OAHN (para 182) based on evidence (para 47) with emphasis on joint working on cross boundary issues where housing needs cannot be wholly met within individual Council administrative areas (para 178 – 181). As the Oadby & Wigston Local Plan has been prepared within a context of uncertainties this should be considered an unsound basis for plan making because the Plan cannot be positively prepared, effective or consistent with</p>	<p>period).</p> <p>In December 2017, the Council approved the Joint Statement of Co-operation Relating to Objectively Assessed Need for Housing (November 2017). The joint statement sets out that up to 2031 the local authorities within the Leicester and Leicestershire Housing Market Area have sufficient capacity to meet the Leicester and Leicestershire Housing Market Area OAN for housing. The statement sets out that the theoretical total housing capacity of the Leicester and Leicestershire Housing Market Area exceeded the OAN for housing by over 100,000 new homes.</p> <p>It should be noted that page 8 of the Council’s Local Plan sets out the relationship of the Strategic Growth Plan with Local Plans. Paragraph 1.5.2 of the Local Plan states <i>‘although the Strategic Growth Plan deals with the time period up to 2050, it treats the period’s pre 2031 and post 2031 very differently. Pre 2031, the housing and employment Objectively Assessed Needs for the Leicester and Leicestershire HMA, set out within the HEDNA, will be delivered through each of the local authorities individual Local Plan’s. The Strategic Growth Plan therefore focuses on the period post 2031, for which it identifies a ‘notional housing need’. It recognises that for this period there are no reliable estimates of population growth or household change, thus it estimates future housing needs by projecting forwards the annual figures set out within the HEDNA’.</i></p>
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		<p>national policy. Whilst there are benefits for development management purposes of having an adopted Local Plan these benefits should not outweigh the requirements for a sound Plan. The approach of deferring into the future via Local Plan Reviews the solution to identified unmet housing needs should not be condoned. These are not just arbitrary numbers but represent households in need of housing now which should not be ignored and "kicked into the long grass".</p> <p>It is also understood that the HMA authorities and Local Enterprise Partnership (LEP) are working on a non-statutory Leicester & Leicestershire Strategic Growth Plan on which a consultation was expected in summer 2017 (now overdue). This Plan will set out in broad terms the amount and location of housing, economic and infrastructure growth until 2050. It is proposed that this strategic framework will be taken into account by Local Plans which will include an agreed spatial distribution, a housing land strategy to boost the speed of housing delivery and a refresh of the Strategic Economic Plan (SEP) incorporating the Midlands Engine for Growth proposals. The precise relationship between the Local Plan and this non-statutory document is not clear.</p> <p>By the time of the Local Plan Examination a Statement of Common Ground explaining cross boundary working as proposed in the recently published Housing White Paper (HWP) "<i>Fixing The Broken Housing Market</i>" and "<i>The Right Homes in the Right Places</i>" consultation may be required. If a Statement of Common Ground is prepared the HBF may wish to submit further comments on the Council's legal compliance with the Duty to Co-operate and any implications for the soundness of the Local Plan in further written Hearing Statements and during oral discussions at the</p>	
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		Examination Hearing Sessions.	
18.12.17	Home Builders Federation (HBF)	<p>Local Plan Review</p> <p>Paragraph 1.5.5 proposes a review of the Local Plan but this commitment is not set out in Policy. As currently worded the HBF is concerned that this text is not a firm policy commitment to an early review. There is no specified timescale for review. There is always the concern that a Council will not deliver in a timely manner on its commitment to an early review even if set out in a Local Plan policy. It is suggested that the any commitment is set out in Policy including a specific timetable for the commencement (within 3 months of adoption) and submission for Examination (within 2 years). Such a Policy will ensure consistency with the North West Leicestershire Local Plan which also dealt with the same issue of unmet needs in the Leicester & Leicestershire HMA and was modified accordingly in its recently concluded Examination.</p> <p>The final version of the MoU anticipated to be signed in January 2018 should set out the declared unmet housing needs in the Leicester & Leicestershire HMA together with the proposed re-distribution of these unmet needs. This should be set out in the Local Plan Review Policy.</p> <p>It is also known that an early review is not the optimum policy mechanism by which to resolve unmet housing need because of the slow response time of such reviews. Therefore ahead of any early review the Council should provide a greater contingency within its overall Housing Land Supply (HLS) together with reserve sites subject to appropriate release mechanisms to give additional flexibility and speed to meeting these identified unmet housing needs.</p>	<p>Comment noted.</p> <p>The Council is confident that the levels of development proposed will come forward within the Plan period as expected and illustrated within the Local Plan housing trajectory. As with any trajectory, the further into the future it forecasts, the (potentially) less reliable it becomes. In the short to medium term the Council are confident that the trajectory is accurate and robust and the 'buffer' is unlikely to be required.</p> <p>Up to 2031, as illustrated, the Borough area can just provide (from a transport and highway network capacity point of view) the required housing need. Post 2031, the Strategic Growth Plan has the potential to 'unlock' further land within the Borough through its proposed provision of large scale highway and transport infrastructure that would relieve the pressures on the transport and highway network within the Leicester Principal Urban Area, particularly Leicester City and the Borough of Oadby and Wigston.</p> <p>In addition, the Council will continue to work closely with all authorities within the Leicester and Leicestershire Housing Market Area, not only in providing the required number of homes up to 2031, but post 2031 in line with the Strategic Growth plan. In Local Plan paragraphs 1.5.6 to 1.5.7 the Council has committed to a review of the Local Plan no later than 5 year from adoption (consistent with national policy and guidance) and has also set out what would trigger an earlier review. The Council considers that the commitment shown in paragraphs 1.5.6 to 1.5.7 illustrate the Council's intentions in an appropriate manner. However, the Council would not object if the wording was required to be set out within a new Local Plan policy.</p>

18.12.17	Home Builders Federation (HBF)	<p>OAHN and Housing Requirement</p> <p>As set out in the NPPF the Council should be proactively supporting sustainable development to deliver the homes needed by identifying and then meeting housing needs (para 17) in particular the Council should be significantly boosting the supply of housing (para 47). The Council should ensure that the assessment of and strategies for housing, employment and other uses are integrated taking full account of market and economic signals (para 158). The Council should use its evidence base to ensure that the Plan meets in full OAHN as far as consistent with the framework including identifying key sites critical to the delivery of the housing strategy over the plan period (para 47).</p> <p>The NPPG advises that housing need should be assessed in relation to the relevant functional area known as the HMA (ID 2a-008). An OAHN should be unconstrained (ID 2a-004) and strongly recommends the use of its standard methodology (ID 2a-005). This methodology is a three stage process comprising :-</p> <ul style="list-style-type: none"> • Demographic based on past population change and household formation rates (HFR) (ID 2a-015 – 017) ; • Economic to accommodate and not jeopardise future job growth (ID 2a-018) ; • Market signals to consider undersupply relative to demand (ID 2a-019 & 020) ; • Affordable housing need is separately assessed (ID 2a-022 – 028) but delivery of affordable housing can be a consideration for increasing planned housing provision (ID 2a-029). <p>The Council's latest OAHN calculation is set out in Leicester & Leicestershire HEDNA 2017. This Report identifies an OAHN for Oadby & Wigston of 2,960 dwellings (148 dwellings per annum) for the plan</p>	<p>Comment noted.</p> <p>Response to these representations is set out in the Local Plan Spatial Strategy Submission document that the Council has produced for Local Plan Submission.</p>
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		<p>period 2011 – 2031. This OAHN comprises of :-</p> <ul style="list-style-type: none"> • A demographic starting point of 123 dwellings per annum using 2014 Sub National Population / Household Projections (SNPP/SNHP) plus 10 year migration trend adjustment multiplied by a vacancy rate ; • 148 dwellings per annum after a market signal adjustment of +25 dwellings per annum. It is noted that Oadby & Wigston has an affordability ratio of 7.7 which within the HMA is second highest after Harborough. As set out in the NPPG the more significant the affordability constraints then the larger the improvement in affordability needed (ID 2a-020). The adjustment of +25 dwellings per annum represents a 20% market signal adjustment. <p>At the HMA level there is no economic growth led adjustment to OAHN because the demographic projections plus market signal adjustment exceed economic led forecasts. Previously at the North West Leicestershire Local Plan Examination the HBF and other parties criticised the HEDNA’s approach of no adjustment to support economic growth. There is a genuine concern that the HEDNA does not positively support economic growth in the HMA.</p> <p>The Councils latest evidence shows a net affordable housing need of 143 dwellings per annum which is the same figure as the Borough’s total OAHN. However the proposed housing requirement disregards this significant affordable housing need and there is no further increase in the total housing requirement to help deliver affordable homes as set out in the NPPG (ID 2a-029). It is acknowledged that the Council may not be able to meet full affordable housing needs because to seek to deliver all identified affordable housing need as a proportion of market housing may result in an unrealistic and undeliverable position</p>	
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		<p>however it does not necessarily mean that some increased provision could not be achieved. The Council has not adequately considered the scope for additional housing over and above OAHN to make a contribution towards meeting affordable housing need.</p> <p>The housing requirement of at least 2,960 dwellings (148 dwellings per annum) for the plan period 2011 – 2031 set out in Policy 2 also excludes any contribution to meeting declared quantified unmet housing needs from elsewhere in the Leicester & Leicestershire HMA. As identified in the HWP the Government considers that Councils may not be undertakings an honest assessment of housing needs. As a consequence the Government has consulted on a standardised methodology for the calculation of OAHN. The Council should give consideration to the implications of the Government’s proposed standard methodology for both the Borough and the HMA. By the time of the Local Plan Examination (if submitted after March 2018) it may be necessary for the Council to prepare an assessment of housing needs based on this standard methodology. If a re-assessment of housing needs using the standard methodology is undertaken the HBF may wish to submit further comments on OAHN and the Council’s housing requirement in written Hearing Statements and during oral discussions at the Examination Hearing Sessions.</p>	
18.12.17	Home Builders Federation (HBF)	<p>Housing Land Supply (HLS) The overall HLS of 2,960 dwellings is set out in Table 1 of the Plan summarised as :-</p> <ul style="list-style-type: none"> • 1,346 dwellings (578 dwellings built April 2011 – March 2017 and 768 dwellings existing commitments as at March 2017) ; • 1,614 dwellings (129 dwellings allocated in Wigston town centre, 76 dwellings allocated in Oadby district centre, Direction for Growth Areas allocations for 1,159 	<p>Comment noted.</p> <p>Response to these representations is set out in the Local Plan Spatial Strategy Submission document that the Council has produced for Local Plan Submission.</p>

		<p> dwellings and allocation of smaller sites (11 – 99 dwellings) for 250 dwellings in Leicester PUA).</p> <p>The HBF do not comment on the merits or otherwise of individual sites therefore our representations are submitted without prejudice to any comments made by other parties on the deliverability of specific sites included in the overall HLS, 5 YHLS and housing trajectory (Figure 1). The Council’s HLS assumes that all of the proposed allocations in the Plan will be found sound. However the soundness of individual allocations will be discussed throughout the course of the examination if any are found to be unsound these will need to be deleted from the HLS accordingly.</p> <p>It is also essential that the Council’s assumptions on lead-in times, non-implementation, lapse and delivery rates for sites are realistic. These assumptions should be supported by parties responsible for delivery of housing and sense checked by the Council using historical empirical data and local knowledge. The figures set out in Table 1 provide no contingency within the HLS. The Council cites an additional 400 dwellings sourced as 40 dwellings from within the settlement boundary of Kilby Bridge, 300 dwellings from Phase 3 of the Wigston Direction for Growth and 70 dwellings from windfalls (see para 4.2.11) which the Council states negates any potential delivery issues on allocated sites and helps fulfil a small proportion of Leicester City’s declared unmet need. This additional 400 dwellings represents a contingency of circa 13.5% the HBF always recommends as large a contingency as possible. The Council’s proposed level of contingency is also below the 10 – 20% non-implementation gap together with 15 – 20% lapse rate illustrated by the DCLG presentation slide from the HBF Planning Conference September 2015 (see below). The slide also</p>	
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		<p>suggests “the need to plan for permissions on more units than the housing start / completions ambition”.</p> <p>The Council should also consider the allocation of developable reserve sites together with an appropriate release mechanism as recommended by the LPEG Report. The LPEG Report proposed that “the NPPF makes clear that local plans should be required not only to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF” (para 11.4 of the LPEG Report).</p>	
18.12.17	Home Builders Federation (HBF)	<p>Year Housing Land Supply (YHLS)</p> <p>At the time of this consultation the Council has not provided an up to date 5 YHLS calculation. The 5 YHLS is a snap shot in time which can change very quickly. The following analysis addresses matters of principle rather than detailed site specific analysis. The HBF’s preferences for the calculation of 5 YHLS are the Sedgefield approach to shortfalls as set out in the NPPG (ID 3-035) with a 20% buffer applied to both the annualised housing requirement and any shortfall.</p> <p>If the Council could not demonstrate a 5 YHLS on adoption of the Local Plan which is maintainable throughout the plan period then the Plan could not be found sound. If further site allocations are needed in order to maximize 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. Inevitably the key to increasing housing supply is increasing the number of</p>	<p>Comment noted.</p> <p>Response to these representations is set out in the Local Plan Spatial Strategy Submission document that the Council has produced for Local Plan Submission.</p>

		<p>sales outlets which means the allocation of more sites.</p> <p>The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. This approach is also advocated in the Housing White Paper because a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.</p> <p>When more information on 5 YHLS becomes available the HBF may wish to submit further comments in written Hearing Statements and during oral discussions at the Examination Hearing Sessions.</p>	
18.12.17	Home Builders Federation (HBF)	<p>Affordable Housing & Viability</p> <p>If the Local Plan is to be compliant with the NPPF development should not be subject to such a scale of obligations and policy burdens that viability is threatened (paras 173 & 174). The residual land value model is highly sensitive to changes in its inputs whereby an adjustment or an error in any one assumption can have a significant impact on viability. Therefore it is important that the Council understands and tests the influence of all inputs on the residual land value as this determines whether or not land is released for development. The Harman Report highlighted that <i>"what ultimately matters for housing delivery is whether the value received by land owners is sufficient to persuade him or her to sell their land for development"</i>.</p> <p>Policy 13 – Affordable Housing proposes on sites of 11+ dwellings differential affordable housing provision of 30% in Oadby, 20% in Wigston and 10% in South Wigston subject to viability.</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The Viability evidence base undertaken for the Local Plan illustrates that the policy requirements set out within the document are viable and do not threaten viability.</p> <p>Local Plan Policy 13 Affordable Housing is based on the policy requirements for affordable housing set out in the Council's Core Strategy. These policy requirements have been successful in delivering affordable housing throughout the Core Strategy Plan period to date. Due to the Borough's affordable housing need, the Council is committed in delivering affordable housing, however is totally aware of the affect affordable housing can have on the viability of development proposals. As mentioned, the Local Plan has been subject to viability evidence base, which illustrates that the policy requirements, as set out, are viable and deliverable. In certain cases, particularly in Oadby, the viability</p>

		<p>The Council's latest viability testing evidence is set out in Oadby & Wigston Whole Plan Viability Assessment Report dated 2017 by Andrew Golland Associates. The findings show that policy trade-offs are required between affordable housing provision and infrastructure. The Council should be mindful that the cumulative burden of policy requirements are not set so high that the majority of sites are only deliverable if these sites are routinely rather than occasionally negotiated on the grounds of viability. The proposed affordable housing tenure mix is 80% affordable rent and 20% intermediate. There should be flexibility in the policy wording so that the Council may deliver a mixed package of affordable housing including affordable home ownership and rented tenures. The Council has identified a need for 33 Starter Homes per annum.</p> <p>It is noted that in Policy 21 the provision of at least 30% affordable housing is required. The setting of a minimum requirement in Policy 21 is inconsistent with the approach set out in Policy 13. This inconsistency is not justified by the Council's viability evidence and the wording "at least" should be deleted.</p>	<p>evidence base suggested higher percentages of affordable housing provision, and a lowering of the affordable housing threshold.</p> <p>The Council wish to reiterate, that all of the policy requirements within the Local Plan have been subject to viability evidence base work, this includes the Policy 21 Cottage Farm Direction for Growth Area. The policy requirements set out in the Plan have been found viable and deliverable. It should be noted that the affordable housing policy requirement set out within Local Plan 21 is consistent with the policy requirement set out in Policy 13 for the Oadby area.</p> <p>In addition, the Council considers that the wording of both Local Plan Policy 13 (...<i>minimum targets</i>) and Policy 21 (...<i>at least</i>) is consistent and does not need amending.</p>
18.12.17	Home Builders Federation (HBF)	<p>In Policy 11 – Housing Choices the Council states "<i>To ensure that new residential development promotes healthy living and dwellings are of the appropriate size for its proposed occupants; (unless there is a demonstrable reason for not doing so) all new dwellings should provide sufficient space for kitchen, dining, bedroom, and living facilities, and should include appropriate levels of internal storage</i>". However this statement is ambiguous and it is unclear if the Council is intending to adopt the Nationally Described Space Standards (NDSS) which are included in Appendix 2 of the Plan. It is recommended that this bullet point in Policy 11 and Appendix 2 are deleted.</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The Council is committed in providing a wide choice of homes that are of high quality and are 'fit for purpose' for modern day living and promote healthy lifestyles and good mental wellbeing, particularly in children and young people.</p> <p>Local Plan Policy 11 Housing Choices does promote the use of the Governments Technical Housing Standards, however in very particular circumstances. The paragraph that the HBF is referring to in its comment is</p>

		<p>The Written Ministerial Statement dated 25th March 2015 confirms that <i>"the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG"</i>. If the Council wishes to adopt the NDSS this should only be done by applying the criteria set out in the NPPG. The NPPG sets out that <i>"Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local Planning Authorities should take account of the following areas need, viability and timing"</i>(ID: 56-020) :-</p> <ul style="list-style-type: none"> • Need - It is incumbent on the Council to provide a local assessment evidencing the specific case for Oadby & Wigston which justifies the inclusion of the NDSS as a Local Plan policy. If it had been the Government's intention that generic statements justified adoption of the NDSS then the logical solution would have been to incorporate the standards as mandatory via the Building Regulations which the Government has not done. The NDSS should only be introduced on a "need to have" rather than a "nice to have" basis. The identification of a need for the NDSS must be more than simply stating that in some cases the standard has not been met it should identify the harm caused or may be caused in the future. • Viability - The impact on viability should be considered in particular an assessment of the cumulative impact of policy burdens. There is a direct relationship between unit size, cost per square metre, selling price per metre and affordability. The Council's Viability Assessment is not based on NDSS compliant units for 2 and 3 bedroom dwellings. The Council cannot simply expect home buyers to 	<p>not intending to adopt the technical standards. The Council through Policy 11 is only seeking to apply the technical standards for conversions, sub-division and / or changes of use of existing buildings, for example redundant commercial or factory units.</p> <p>The Council seeks the use of the technical standards in these specific circumstances due to the relatively high number of extant commercial and factory units in predominately residential areas of the Borough and the low standard of development proposals for their sub-division that have been promoted in recent history. On a non statutory basis, through the planning application negotiation process, the Council has been successfully applying the standards on sub-division of existing commercial or factory properties. Thus far, the Council has not been made aware of any viability issues due to the applying of the technical standards in specific development proposals.</p> <p>Paragraph 93 of the NPPF states that: <i>'Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development'</i>. Policy 38 of the Local Plan seeks to promote development that helps to achieve reduction in greenhouse gas emissions and support the delivery of renewable and low carbon energy infrastructure.</p> <p>The final section of Local Plan Policy 38 seeks all development over 1 hectare in size to incorporate onsite renewable energy generation or onsite provision of buildings that reduce the need for non renewable</p>
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		<p>absorb extra costs in a Local Plan area where there exists severe affordability pressures. There is also an impact of larger dwellings on land supply. The requirement for the NDSS would reduce site yields or the number of units on a site. Therefore the amount of land needed to achieve the same number of units must be increased. The efficient use of land is less because development densities have been decreased. At the same time the infrastructure and regulatory burden on fewer units per site intensifies the challenge of meeting residual land values which determines whether or not land is released for development by a willing landowner especially in lower value areas and on brownfield sites. It may also undermine delivery of affordable housing at the same time as pushing additional families into affordable housing need because they can no longer afford to buy a NDSS compliant home. The Council should undertake an assessment of these impacts.</p> <ul style="list-style-type: none"> • Timing - The Councils should take into consideration any adverse effects on delivery rates of sites included in the housing trajectory. The delivery rates on many sites will be predicated on market affordability at relevant price points of units and maximising absorption rates. An adverse impact on the affordability of starter home / first time buyer products may translate into reduced or slower delivery rates. As a consequence the Council should put forward proposals for transitional arrangements. The land deals underpinning the majority of identified sites will have been secured prior to any proposed introduction of NDSS. These sites should be allowed to move through the planning system before any proposed policy requirements are enforced. The NDSS should not be applied to any outline or detailed approval prior to the specified date and any reserved matters applications should not be subject to the nationally described space standards. 	<p>energy use. The policy however allows flexibility in meeting this requirement on feasibility and viability grounds. The policy wording states that should onsite provision be deemed not feasible or viable then the requirement would cease to apply in that instance.</p>
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		The achievement of Building Regulation standards for energy efficiency is a requirement of Policy 38– Climate Change . Therefore the meaning of the statement “ <i>will be required to incorporate on site renewables energy generation or on-site provision of buildings that reduce need for non-renewable energy use</i> ” in Policy 38 is unclear. As there is no further explanation of the meaning or purpose of this statement in the supporting text it is suggested that this wording is unnecessary and should be deleted.	
18.12.17	Home Builders Federation (HBF)	Housing Mix In Policy 14 the Council proposes to encourage self / custom build. The HBF is supportive of the Council’s approach to the encouragement of self / custom build which is a potential contributor to overall housing supply. However it is noted that in Policy 21 this encouragement has become a policy requirement so there is an inconsistency in the Council’s approach. It is not evident that the Council has assessed such housing needs in its SHMA work as set out in the NPPG (ID 2a-021) or viability tested such a policy requirement.	Comment noted. To ensure consistency with Local Plan Policy 14, which ‘encourages’ provision, the Council would not be opposed to a rewording of the relevant policy bullet points (in Local Plan Policy 18, 20 and 21) in relation to provision of Self Build and Custom Build, that sought an ‘encouragement’ for provision, rather than a ‘requirement’ for provision.
18.12.17	Home Builders Federation (HBF)	Conclusion For the Oadby & Wigston Local Plan to be found sound under the four tests of soundness as defined by the NPPF (para 182), the Plan should be positively prepared, justified, effective and consistent with national policy. Currently the Local Plan is unsound because of :- <ul style="list-style-type: none"> • an under-estimation of housing needs ; • an ineffective review mechanism to deal with identified unmet housing needs in Leicester & Leicestershire HMA ; • insufficient flexibility in overall HLS ; • potentially no 5 YHLS on adoption of the Plan ; • unjustified policy requirements for NDSS ; • insufficient viability testing of proposed affordable 	Comment noted. The Council considers that the Local Plan has been positively prepared, it is justified, it is effective and it is consistent with national policy. Please see officer responses to all other HBF comments for the Council’s reasoning for this.

		<p>housing policy.</p> <p>Therefore the Local Plan is inconsistent with national policy. It is not positively prepared or properly justified meaning it will be ineffective. It is hoped that these representations are of assistance to the Council in preparing the next stages of the Oadby & Wigston Local Plan. In the meantime if any further information or assistance is required please contact the undersigned.</p>	
18.12.17	Landmark Planning (North of Newton Lane)	<p>Page 8 - The Leicester and Leicestershire Statement of Cooperation and Strategic Growth Plan</p> <p>Paragraphs 1.5.1 – 1.5.4</p> <p>Page 8 of the Pre-Submission Local Plan sets out how the Council considers it has fulfilled its Duty to Co-operate, as set out in S110 of the Localism Act 2011, which introduced S33A into the 2004 Act. In addition to the legal requirement in respect of the Duty to Co-operate, the National Planning Policy Framework (NPPF) provides guidance on how this should be undertaken and what should be incorporated so as to ensure that the duty is fully discharged.</p> <p>Paragraph 179 of the NPPF states that Local Planning Authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans. Paragraph 181 continues that Local Planning Authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination.</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The Borough area of Oadby and Wigston is unique in England and comprises a small compact urban area, adjacent to the major City of Leicester. The Borough area is constrained by a number of factors, including land availability; however its key constraint is its severely congested transport and highway infrastructure network. As illustrated by the South East Leicester Transport Study, the scale of development identified within the Council's Local Plan up to 2031 can just be accommodated, however with required mitigation. Additional development over and above that identified within the Local Plan could seriously undermine the deliverability of the development identified in the Plan.</p> <p>Throughout the production of the Local Plan, the Council has met the Duty to Cooperate. All local authorities within the Leicester and Leicestershire Housing Market Area (HMA) have good working relationships and a common goal, which is meeting the HMA's Objectively Assessed Need (OAN) in both housing and employment. The Duty to Cooperate Statement document illustrates how the Council has met the Duty to Cooperate throughout Local Plan</p>

		<p>Paragraph 182 of the NPPF makes clear that a plan should be positively prepared in order to be 'sound', i.e. it should be prepared to meet objectively assessed development and infrastructure requirements, <i>"including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development."</i> This is also reflected in paragraph 47 in respect of housing, which requires Local Plans to meet the full, objectively assessed needs for market and affordable housing in the housing market area.</p> <p>Considered in the context of this clear framework for cross boundary working, Oadby and Wigston is one of the Leicestershire planning authorities, which, together with Leicester City, form the Leicester & Leicestershire Housing Market Area (HMA). Oadby and Wigston Borough in its entirety is also a component part of the Leicester Principal Urban Area (PUA).</p> <p>There has been a long history of co-operation amongst the Leicester and Leicestershire authorities in respect of strategic matters. This extends to housing, and the Leicester and Leicestershire Housing and Economic Development Needs Assessment 2017 (HEDNA) sets out the identified objectively assessed housing needs (OAHN) for the HMA: 4,829 dwellings per annum 2011 – 2031 and 4,716 dwellings per annum between 2011 – 2036.</p> <p>It is apparent from Leicester City Council's own work on their emerging Local Plan that there is an acknowledged shortfall in Leicester's capacity to meet its own OAHN to 2031 within its administrative boundaries. The City Council's Local Plan 'Emerging Options' Consultation Paper states at paragraph 3.7 that there is a shortfall of around</p>	<p>production.</p> <p>The Council's Local Plan allocates sufficient land to meet its own Objectively Assessed Needs in full.</p> <p>In addition to the Council meeting its own OAN for housing, the Local Plan (at paragraph 4.2.11) illustrates a 'buffer' of new additional homes. This buffer would negate any potential delivery issues on allocated sites, as well as help fulfil a proportion of Leicester City's declared unmet need. It should be noted that Leicester City is the only authority within the Leicester and Leicestershire HMA to declare an unmet housing need. All other authorities can (at least) meet their own identified need.</p> <p>It should be noted that the Borough has worked proactively and positively to meet its OAN for housing, particularly as it has been a huge 'step' change. The Local Plan period target of 2960 over the 20 year plan period is a 60 per cent increase on the Core Strategy target of 1800 new homes (over a similar 20 year period).</p> <p>In December 2017, the Council approved the Joint Statement of Co-operation Relating to Objectively Assessed Need for Housing (November 2017). The joint statement sets out that up to 2031 the local authorities within the Leicester and Leicestershire Housing Market Area have sufficient capacity to meet the Leicester and Leicestershire Housing Market Area OAN for housing. The statement sets out that the theoretical total housing capacity of the Leicester and Leicestershire Housing Market Area exceeded the OAN for housing by over 100,000 new homes.</p> <p>In addition, all local authorities within the Leicester and</p>
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		<p>15,000 dwellings to 2031 but potential housing capacity within the City's boundaries of only an additional 7,100. Consultation on this paper closes on 17th December 2017.</p> <p>It is logical that as a directly adjoining authority area that also forms part of the PUA, Oadby and Wigston Borough should be considering the serious likelihood that it will need to accommodate additional land within the Borough to meet the unmet needs identified in Leicester City and addressing this, even in the most flexible terms, within this pre-submission stage of the Local Plan.</p> <p>At present, Oadby and Wigston are proceeding towards examination of a Local Plan against this backdrop of uncertainty, with no agreement yet in place between the various authorities in respect of housing distribution. Indeed it is set out in paragraph 1.5.3 of the Pre-Submission Local Plan that a Statement of Cooperation and subsequent Memorandum of Understanding are yet to be produced and signed. Of great concern is the fact that this agreement is critical to meeting OAHN up to 2031, i.e. the same plan period as the emerging Oadby and Wigston Local Plan, not some distant, theoretical prospect. The absence of any such co-operation statement fundamentally undermines the ability of the Plan to meet the requirements set out in paragraphs 47, 178 – 181 and 182 of the NPPF.</p> <p>Whilst Oadby and Wigston may have co-operated with other authorities on a superficial level, the lack of effective and meaningful outcome to this collaboration has serious implications for the soundness of the emerging Local Plan. It is difficult to see in this context how a plan could be considered to be positively prepared, justified, effective or consistent with national</p>	<p>Leicestershire HMA have been working together on the production of the Leicester and Leicestershire Strategic Growth Plan. The relationship of the Strategic Growth Plan to Local Plans is set out at paragraph 1.5.2 of the Local Plan, which states 'although the Strategic Growth Plan deals with the time period up to 2050, it treats the period's pre 2031 and post 2031 very differently. Pre 2031, the housing and employment Objectively Assessed Needs for the Leicester and Leicestershire HMA, set out within the HEDNA, will be delivered through each of the local authorities individual Local Plan's. The Strategic Growth Plan therefore focuses on the period post 2031, for which it identifies a 'notional housing need'. It recognises that for this period there are no reliable estimates of population growth or household change, thus it estimates future housing needs by projecting forwards the annual figures set out within the HEDNA'.</p> <p>The Council will continue to work closely with all authorities within the Leicester and Leicestershire Housing Market Area, not only in providing the required number of homes up to 2031, but post 2031 in line with the Strategic Growth plan.</p>
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		<p>policy.</p> <p>It is our view that in order to be considered sound, there must be a Memorandum of Understanding in place between the authorities in the Leicestershire HMA and recognition of the requirements of this in the emerging Oadby and Wigston Local Plan.</p>	
18.12.17	Landmark Planning (North of Newton Lane)	<p>Paragraph 1.5.5.</p> <p>The Council states in paragraph 1.5.5 that it is committed to a review of the Local Plan in 5 years. However, this commitment is made in the context of addressing post-2031 development needs as will be set out in the yet to be published Strategic Growth Plan. The plan does not make any commitment to a review of the plan to ensure that more immediate housing needs across the HMA can be met, either in the text or policy.</p> <p>Delaying review of the Plan until a third of the way into the plan period could significantly undermine housing delivery across the HMA and is no more in any case than is required by National Planning Practice Guidance (NPPG) to keep plans up to date. It is certainly not sufficient to deal with the particular circumstances of the Leicester and Leicestershire HMA, where there is known unmet need in Leicester that will need to be accommodated in adjoining authority boundaries.</p> <p>Given the timescales often involved in a review of the local plan, it is considered that the Local Plan should contain a formal policy commitment to specific timescales to ensure that the review takes place in a timely manner.</p> <p>It is also our view that in order to comply with the requirement for a Plan to be positively prepared (and</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>Under The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017, national government requires local planning authorities to review the Local Plan every 5 years from date of adoption.</p> <p>In Local Plan paragraphs 1.5.6 to 1.5.7 the Council has committed to a review of the Local Plan (not the Strategic Growth Plan) no later than 5 year from adoption (consistent with national policy and guidance) and has also set out what would trigger an earlier review. The Council considers that the commitment shown in paragraphs 1.5.6 to 1.5.7 illustrate the Council's intentions in an appropriate manner. However, the Council would not object if the wording was required to be set out within a new Local Plan.</p> <p>In addition it should be noted that the Department for Communities and Local Government (DCLG) has specified the introduction of regulations that require local authorities to review Local Plans at least every five years. DCLG suggest (in a letter dated 21st December 2017) that, every 5 years from adoption, authorities must carry out an assessment of whether the Plan remains relevant and effectively addresses the needs of the local community or whether policies need updating. Depending on the assessment outcome, the local</p>

		<p>thus meet the tests of 'soundness') and in recognition of the evidence base regarding unmet housing need in Leicester, it would be prudent for the Plan to make provision for 'reserve' housing sites that could be released as future growth requirements arise. This approach would accord with the approach set out in paragraph 157 of the NPPF that states that Local Plans should take account of longer term requirements, i.e. beyond a 15-year time frame. It would also aid the speed of local plan review and provide the flexibility to deal with changing circumstances as required by paragraph 14 of the NPPF.</p> <p>The site north of Newton Lane at Seven Oaks Farm in which Davidsons Developments Ltd has an interest, would be an appropriate reserve site which, together with the site to the west of Seven Oaks Farm (which also has developer interest), would relate well to the Wigston Direction for Growth Area. Further consideration is given to this site later in these representations.</p>	<p>authority will publish their reasons for not updating policies, or update their Local Development Schemes to set out the timetable for updating their Plan (and then should update their Plan). The Council is not aware of any recent DCLG statement that suggests that local authorities should set out Local Plan review completion / end dates within its Local Plan.</p> <p>The Council's Local Plan allocates sufficient land to meet its own Objectively Assessed Needs in full. The Local Plan also identifies a residential 'buffer' of approximately 400 new homes, which would negate any potential delivery issues on allocated sites in the future, but also could help fulfil a small proportion of Leicester City's unmet need.</p>
18.12.17	Landmark Planning (North of Newton Lane)	<p>Page 27 – Housing Growth</p> <p>Paragraphs 4.2.4 to 4.2.6</p> <p>Paragraph 47 of the NPPF states that to boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the HMA, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.</p> <p>The Council identifies at paragraph 4.2.4 of the plan that its OAHN for the period 2011 – 2031 is 2,960 dwellings (148 dwellings per annum). This figure derives from the Leicester and Leicestershire HEDNA,</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The Council considers that the assumptions and conclusions of the Leicester and Leicestershire Housing Economic Development Needs Assessment (HEDNA) are robust and justified. All of the local authorities within the Leicester and Leicestershire Housing Market Area have accepted the outcomes of the HEDNA and approved the Joint Statement of Co-operation Relating to Objectively Assessed Need for Housing (November 2017). The joint statement sets out that up to 2031 the local authorities within the Leicester and Leicestershire Housing Market Area have sufficient capacity to meet the Leicester and Leicestershire Housing Market Area OAN for housing. The statement sets out that the</p>

		<p>which provides a 'policy off' assessment of the need for housing following the guidance set out in the NPPG.</p> <p>Paragraph: 029 Reference ID: 2a-029-20140306 of the NPPG makes the case that total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. It goes on to state that an increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes. NPPF considers this issue separately to any adjustments made in respect of market signals.</p> <p>The HEDNA highlights Oadby and Wigston as the only authority in the HMA where the net need for affordable housing per annum exceeds the demographic led housing need and notes that the evidence would justify consideration of upward adjustments to increase affordable housing delivery in all of the HMA local authorities (albeit a note of caution is added in doing this). Notwithstanding the significant affordable housing need, HEDNA does not seek to adjust the OAHN to address affordable housing need, making only a market signal adjustment of 20% (an additional 25 dwellings above the identified demographic led requirement).</p> <p>As made clear in HEDNA, OAHN figures for the HMA are not plan targets but the starting point for discussion. In light of this it is considered that it is within Oadby and Wigston's remit to consider an upwards adjustment to the OAHN in the Borough to address affordable housing need, especially in light of historic under-delivery. Similarly, the OAHN does not take into account the potential need to meet unmet housing needs from</p>	<p>theoretical total housing capacity of the Leicester and Leicestershire Housing Market Area exceeded the OAN for housing by over 100,000 new homes. In addition, all local authorities within the Leicester and Leicestershire HMA have been working together on the production of the Leicester and Leicestershire Strategic Growth Plan.</p> <p>In addition, the HEDNA has been found sound and robust evidence base at the recent North West Leicestershire Local Plan Examination in Public. Therefore, the assumptions and conclusions within the HEDNA conform to national policy and guidance set out in the NPPF and NPPG. In conformity with national policy and guidance, the HEDNA used national population projections as its starting point from which upward adjustments were made. It is incorrect to suggest that the HEDNA did not take account of upwards adjustments relating to affordable housing need.</p> <p>To note, the Council is in agreement that the housing OAN identified within the HEDNA is not a Plan target. The figures identified within the HEDNA are the starting point from which Plan targets flow. To get to the Plan period target specified within the Council's Local Plan, various pieces of evidence base documentation was taken account of, including land availability, and most importantly in context of the Borough, transport and highway infrastructure testing.</p> <p>It should be noted that at paragraph 4.2.11 of the Local Plan, the Council illustrates a 'buffer' of new additional homes up to 2031. This buffer would negate any potential delivery issues on allocated sites, as well as help fulfil a proportion of Leicester City's declared unmet need.</p>
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		<p>other authority areas in the HMA, particularly Leicester City. To be positively prepared (and thus sound) the Local Plan needs to adequately address these issues and consequently allocate additional sites to meet any uplift to the OAN.</p>	
18.12.17	Landmark Planning (North of Newton Lane)	<p>Policy 2 – Spatial Strategy for Development within the Borough</p> <p>Draft Policy 2 sets out the spatial strategy for the Borough in respect of the quantum and location of development. In respect of housing, the Council proposes an overall housing requirement that exactly matches the OAHN of 2,960 dwellings identified in HEDNA. This is not considered a sound basis on which to ensure delivery of the housing needed within the Borough. Without any element of flexibility to deal with non-implementation or delays to development, it is our view that the plan cannot be judged to be effective .</p> <p>Similarly, the plan fails to have sufficient flexibility to adapt to rapid change as required by paragraph 14 of the Framework and is therefore not consistent with national policy. This is particularly pertinent as 60% of the projected housing delivery is to occur on the three Direction for Growth areas in the Borough where delays in lead times are more likely to happen. In this regard, it is widely accepted that housing delivery can be slow on large strategic sites, as substantial infrastructure works are required ahead of dwellings being constructed and delivered. The dominance of a limited number of sites will therefore risk the future delivery of housing in Wigston and so place at risk the vision and objectives of the emerging Local Plan.</p> <p>Furthermore, whilst paragraphs 4.2.11 and 4.3.36 refer to a buffer being provided of circa 400 dwellings (40 at Kilby Bridge, 70 windfall allowance over the plan period</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>Upon the publication of the HEDNA in January 2017, the Council has had to work extremely proactively and positively to meet its illustrated housing OAN. The housing OAN illustrated within the HEDNA (and subsequent Plan target) is a huge 'step change' for the Council. From planning for 90 dwellings per year, the Council has had to plan for 148 dwellings per year to fulfil its own OAN.</p> <p>The huge change / shift in housing requirement has meant that the Council has had to identify and allocate over 60 per cent more land than it would have been required to identify should the requirement have remained at 90 dwellings per year. The principal constraint for the Council, has always been its highway and transport infrastructure and network. The highway network within the Borough is currently severely congested along both its routes and its junctions; the levels of growth identified and allocated only exacerbate this further.</p> <p>The South East Leicestershire Transport Study assessed the highway and transport network within the Borough up to 2031 taking account of the land identified and allocated within the Local Plan. The assessment concluded that the levels of development proposed could be accommodated, however highway mitigation works would be required. Any development over and above that proposed within the Plan is likely to have</p>

		<p>and 300 at phase 3 of the Wigston Direction for Growth area) these do not represent a planned approach to dealing with the circumstances in which a contingency is required. The 300 additional dwellings at phase 3 the Wigston Direction for Growth area are noted to be planned for post-2031 and would, in any case, need to be considered through a future review of the plan. Phase 3 development is not evaluated in the sustainability appraisal and thus it cannot be considered at this point that it necessarily be would be the most appropriate strategy and is not therefore justified.</p> <p>It is our view that there is a strong case for making provision for reserve sites in the Local Plan, given the likelihood that should the Plan proceed to adoption it will require an early review to deal with the matter of unmet needs from elsewhere within the HMA. This approach would give some certainty to the direction of travel in any early review, as well as help speed up the process.</p> <p>Seven Oaks Farm to the north of Newton Lane, Wigston, (in which Davidsons Developments has an interest) combined with the land to the west would provide a suitable location for accommodating additional development and could perform as a reserve site, subject to an appropriate release mechanism.</p> <p>Such an allocation would give the plan some flexibility and assist in meeting the requirement for the plan to be sound. Davidsons and Jelsons are keen to work collaboratively and are liaising regarding the sites; hence why the supporting Landscape Framework and Transport Appraisal considered below cover both areas of land.</p>	<p>significant further impacts on the local highway network.</p> <p>As suggested by the representation, in addition to the Council meeting its own OAN for housing, the Local Plan (at paragraph 4.2.11) illustrates a 'buffer' of new additional homes up to 2031. This buffer would negate any potential delivery issues on allocated sites, as well as help fulfil a proportion of Leicester City's declared unmet need.</p> <p>In addition, the Council is confident that the levels of development proposed will come forward within the Plan period as expected and illustrated within the Local Plan housing trajectory. As with any trajectory, the further into the future it forecasts, the (potentially) less reliable it becomes. In the short to medium term the Council are confident that the trajectory is accurate and robust and the 'buffer' is unlikely to be required.</p> <p>Up to 2031, as illustrated, the Borough area can just provide (from a transport and highway network capacity point of view) the required housing need. Post 2031, the Strategic Growth Plan has the potential to 'unlock' further land within the Borough through its proposed provision of large scale highway and transport infrastructure that would relieve the pressures on the transport and highway network within the Leicester Principal Urban Area, particularly Leicester City and the Borough of Oadby and Wigston.</p> <p>As suggested earlier, due to the constrained and congested nature of the Borough's highway network any development over and above that allocated within the Local Plan (up to 2031) would be subject to highway testing that took account of cumulative impact and not just site specific impact.</p>
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		<p>Land to the north of Newton Lane, including the Seven Oaks Farm site has been considered as part of the sustainability appraisal and whilst not allocated, it scored comparably to sites that have been allocated, e.g. the Cottage Farm extension on the A6 at Oadby. The sustainability credentials of the Seven Oaks Farm location were broadly outlined in the representations made to the Preferred Options consultation in December 2016. These current representations are supported by further evidence of the suitability of the site for development; namely a Landscape Framework Plan (prepared by Golby + Luck) and a Transport Appraisal (undertaken by ADC Infrastructure). Both Sites.</p> <p>The Landscape Framework Plan demonstrates how land to the north of Newton Lane, including the land at Seven Oaks Farm, could form a logical extension to Wigston that would also complement and link into the consented/allocated Direction for Growth to the south and east of the settlement. The site would be capable of delivering significant new areas of publicly accessible Green Infrastructure that would build on existing public rights of way and natural features and providing green linkages between Oadby golf course right through to Kilby Bridge. At the same time the function of the Green Wedge would not be compromised and built development would be designed to be no closer to Oadby than it is at present.</p> <p>The Transport Appraisal considers a number of options for site access, including adding a fourth arm to the roundabout serving Phase 1 of the Direction for Growth. In all scenarios at least 2 points of access can be achieved. The report considers there to be scope for diverting a bus service through the site and that good pedestrian and cycling connections could be secured.</p>	<p>In reference to the land North of Newton Lane, as submitted by Landmark Planning, it is important to highlight that the site does not have a main site access point that is directly onto a main arterial route, for example a route classified as an A Road or B Road. It should also be noted that the site did not form part of the South East Leicestershire Transport Study, therefore has not been taken account of from a cumulative transport / highway testing perspective. All three Direction for Growth Areas allocated within the Local Plan have been subject to cumulative transport / highway testing and were taken account of in the South East Leicestershire Transport</p>
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		<p>Whilst junctions would require modeling in order to fully assess the impact of the development of the site on the highway network, the appraisal considers that mitigation could be implemented where any impact would be severe.</p> <p>In summary, the plan is not currently sound as it is not positively prepared or effective. In order to make the plan sound, the Council should include a 'buffer' for delays or non-implementation in delivering the housing trajectory. It is our view that such a buffer could take the form of 'reserve' sites and that land north of Newton Lane, Wigston would be a suitable and sustainable site.</p>	
18.12.17	Landmark Planning (North of Newton Lane)	<p>Policy 6 – High Quality Design and Materials</p> <p>Davidsons Developments Ltd support the Pre-Submission Local Plan's positive approach to design and construction. This accords with guidance contained in paragraph 59 of the NPPF and avoids being overly prescriptive in design matters. It is pointed out, however, that not every application will require a Design and Access Statement and this requires correcting.</p>	Comment of support noted.
18.12.17	Landmark Planning (North of Newton Lane)	<p>Policy 8 – Green Infrastructure</p> <p>The positive stance in this policy to creating new Green Infrastructure is supported and reflective of paragraph 114 of the NPPF, which adopts a positive approach to creation, protection, enhancement and management of networks of biodiversity and green infrastructure.</p> <p>As demonstrated in the supporting information that accompanies these representations, the creation and enhancement of green infrastructure are significant benefits that could be delivered by development to the north of Newton Lane.</p>	Comment of support noted.

18.12.17	Landmark Planning (North of Newton Lane)	<p>Policy 12 - Housing Density</p> <p>Davidsons is 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. We therefore welcome the policy amendment to include a density requirement of 30 dwellings per hectares for locations outside of the urban area.</p> <p>It is acknowledged that paragraph 47 of the NPPF allows Local Planning Authorities to set their own density policies. However, it is considered that policy 12 remains unrealistic in respect of the 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 could also lead to the Borough Council allocating insufficient land through the Local Plan process if high densities are relied upon.</p> <p>Furthermore, the policy does not explicitly differentiate between gross or net densities. The density at which a site can be developed will vary depending upon a number of factors including the policy context, the size of the site, configuration and the need for on-site infrastructure/ancillary uses such as schools, shopping areas, open space, flood attenuation, landscape buffer strips and roads.</p> <p>Typically, smaller sites will make use of existing roads and facilities and yield can be readily assessed using a net density multiplier.</p> <p>However, on larger sites, the density multiplier must reflect that as the demand for other\ uses becomes</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>Within the Council’s Local Plan Preferred Options Consultation document, a two tiered approach to housing density was promoted. In summary, the approach sought 50 dph within town centre locations and 40 dph for all other locations. Having considered representations relating to dph, the Council amended the Local Plan to promote a three tiered approach. 50 dph was sought in town centre locations, 40dph in the rest of the Leicester PUA and 30 dph elsewhere. The densities illustrated within the Local Plan are gross values.</p> <p>In producing the Local Plan the Council took account of the Department for Communities and Local Governments ‘Fixing our broken housing market’ white paper (February 2017) and the HM Treasury Autumn Budget 2017, both of which encourage local authorities to build at higher densities in appropriate locations.</p> <p>The Council considers that the three tiered approach, relating to the location of development proposals is appropriate for the Borough, taking account of its predominately urban compact form.</p>
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		<p>greater, the gross to net ration decreases.</p> <p>Applying a blanket minimum density across all sites larger than 0.3ha is therefore unrealistic and as noted above could undermine delivery of housing in the Borough. The policy is therefore considered ineffective in terms of its deliverability. As a minimum the policy should be re-worded so that densities are not an "at least" requirement but are set as a target.</p>	
18.12.17	Landmark Planning (North of Newton Lane)	<p>Policy 13 - Affordable Housing</p> <p>We are pleased to note that the Council has updated their evidence base in terms of the Affordable Housing Viability Assessment. The policy should include provision for starter homes, which are acknowledged to make a contribution towards meeting affordable housing needs. The Council has identified an annual need for 33 starter homes in the Borough and this should be incorporated within the policy to ensure that that plan is positively prepared and effective and can therefore meet the tests of soundness.</p>	<p>Comment noted.</p> <p>As suggested at paragraph 6.3.6 of the Local Plan, the provision of Starter Homes on 'qualifying' sites will be done so in conformity with the national government guidance and policy at the time of consideration of the planning proposal. The Housing and Planning Act 2016 suggests that affordable housing includes starter homes within its definition. The Act also sets out the definition of a starter home. For the purposes of this local policy, the definition for starter homes will be consistent with that set out within the Housing and Planning Act 2016.</p> <p>The Council has not identified annual need for 33 starter homes within the policy.</p>
18.12.17	Landmark Planning (North of Newton Lane)	<p>Policy 20 – Wigston Direction for Growth Area</p> <p>The Council's proposed allocation of an expanded Direction for Growth Area adjoining Wigston is supported in principle. It is our view that this policy provides an opportunity to ensure that the plan is both positively prepared, effective and justified by identifying additional growth areas (or reserve sites) that may be needed to deliver the OAHN across the Leicester and Leicestershire HMA. Paragraph 7.4.17 alludes to the fact that further development could occur within this growth area beyond the Plan period, subject to testing</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The Council's Local Plan allocates sufficient land to meet its own Objectively Assessed Needs in full. The Local Plan also identifies a residential 'buffer' of approximately 400 new homes, which would negate any potential delivery issues on allocated sites in the future, but also could help fulfil a small proportion of Leicester City's unmet need.</p> <p>The Borough area of Oadby and Wigston is unique in</p>

		<p>through a review of the Plan.</p> <p>We consider that this exercise should be carried out as part of this Local Plan process. Furthermore, consideration of additional land should not be confined purely to the Council’s suggested Phase 3 Wigston Direction for Growth Area but should properly assess all possible options in the area, including land north of Newton Lane, including the land at Seven Oaks Farm. Land north of Newton Lane would integrate well with Phase 1 and 2 elements of the Wigston Growth Area, as demonstrated by the Landscape Framework Plan and can deliver sustainable development in respect of transport choice. As noted in 7.4.3 of Pre-Submission Draft Plan, further development at the Wigston Direction for Growth Area would continue to support the Vision and spatial objectives of the Local Plan.</p> <p>As a minimum the policy should make explicit reference to expanding the Wigston Direction for Growth Area beyond Phase 2 and define the physical boundaries of the expanded area. It is our view that this should identify land to the north of Newton Lane. It should also ideally clarify the mechanism by which the release of the additional land is managed, either within Policy 20 or alternatively in Policy 2 Spatial Strategy through the specific identification of “reserve sites”. These changes are considered necessary to render the Plan sound and specifically to ensure that the Local Plan meets objectively assessed needs, with sufficient flexibility to adapt to rapid change.</p>	<p>England and comprises a small compact urban area, adjacent to the major City of Leicester. The Borough area is constrained by a number of factors, including land availability; however its key constraint is its severely congested transport and highway infrastructure network. As illustrated by the South East Leicester Transport Study, the scale of development identified within the Council’s Local Plan up to 2031 can just be accommodated, however with required mitigation. Additional development over and above that identified within the Local Plan could seriously undermine the deliverability of the development identified in the Plan.</p>
18.12.17	Landmark Planning (North of Newton Lane)	<p>Policy 38 – Climate Change</p> <p>This policy is unclear in its requirements or the justification behind them. The opening paragraph of the policy requires new development proposals to achieve the national prescribed sustainable building standards</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>Paragraph’s 93 to 104 of the National Planning Policy Framework state that Local Planning Authority’s should adopt proactive strategies to mitigate and adapt to</p>

		<p>for energy efficiency (presumably Building Regulation standards). In respect of climate change the next element of the policy requires that major scale planning applications be accompanied by a Sustainability/Energy Statement to demonstrate how harmful emissions will be reduced by addressing a number of issues; one of these is the 'feasibility of integrating renewable energy solutions into the development'. This suggests that this is an option to be investigated, not a requirement of development. The final element of the policy, Renewable/Low Carbon Energy, states that all developments greater than 1ha in size will be required to incorporate on-site renewable energy provision or on-site provision of buildings that reduce the need for non-renewable energy use.</p> <p>This seems to be at odds with the more flexible approach adopted earlier in the policy. It makes the policy unclear and it is not apparent for the justification behind this. To ensure that the policy is sound, this latter requirement should be deleted.</p>	<p>climate change, taking account of flood risk. The NPPF also suggests that to help increase the use and supply of renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources.</p> <p>Through Local Plan Policy 38 Climate Change, Flood Risk and Renewable Low Carbon Energy, the Council is taking a proactive approach to delivering development that seeks to deliver the policy objectives in NPPF paragraph's 93 to 104.</p> <p>The Council considers that having development proposals accompanied with a Sustainability / Energy Statement enables the Council to properly assess the development proposal to ensure that it meets the policy objectives of national policy and guidance.</p> <p>Paragraph 93 of the NPPF states that: <i>'Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development.'</i></p> <p>Policy 38 of the Local Plan seeks to promote development that helps to achieve reduction in greenhouse gas emissions and support the delivery of renewable and low carbon energy infrastructure. The final section of Local Plan Policy 38 seeks all development over 1 hectare in size to incorporate onsite renewable energy generation or onsite provision of buildings that reduce the need for non renewable</p>
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			energy use. The policy however allows flexibility in meeting this requirement on feasibility and viability grounds. The policy wording states that should onsite provision be deemed not feasible or viable then the requirement would cease to apply in that instance.
18.12.17	Landmark Planning (North of Newton Lane)	<p>Policy 42 - Green Wedges</p> <p>The principle of Green Wedges and the function they perform are supported. We also note that an updated Green Wedge review has been carried out to evaluate the Green Wedge within Oadby and Wigston Borough. It is not clear from this review however, how it has considered future development pressure that may be generated by the Borough needing to accommodate unmet need from Leicester City.</p> <p>Whilst adhering to the principles of protecting the Green Wedge, the policy should also recognise that much designated Green Wedge land is within sustainable locations and meets the objectives of green wedge designation to varying degrees. In order to be positively prepared, we are of the view that the policy should make provision for further review of the Green Wedge where this is required to deliver an increased housing requirement.</p>	<p>Comment of support noted.</p> <p>In Local Plan paragraphs 1.5.6 to 1.5.7 the Council has committed to a review of the Local Plan no later than 5 year from adoption (consistent with national policy and guidance) and has also set out what would trigger an earlier review. The Council considers that the commitment shown in paragraphs 1.5.6 to 1.5.7 illustrate the Council's intentions in an appropriate manner. Should a trigger be met and a review of the Council's Local Plan be required, all possible options for development would be appraised / assessed for their suitability and appropriateness. Due to this, the Council does not consider it necessary to include a statement within Local Plan Policy 42 Green Wedges.</p>
18.12.17	Landmark Planning (North of Newton Lane)	<p>Policy 43 – Countryside</p> <p>The balanced approach to development in the countryside is welcomed and is consistent with the approach taken in the NPPF. The recognition within the policy itself that there is potential for a justifiable need to outweigh adverse impacts on the countryside is supported. This is particularly important at Wigston where it is recognised that new development in the countryside will be required on the edge of the urban area.</p>	Comment of support noted.
18.12.17	Leicestershire	Leicestershire County Council, in its role as local	Comment of support noted.

	County Council	highway authority (LHA), has been working closely with Oadby and Wigston Borough Council (OWBC) as part of the Local Plan making process. As such it is content that the draft submission document is appropriately evidenced and also appropriately deals with transportation considerations at this stage in the planning process. Subject to OWBC's continued commitment to the policies and delivery approaches set out within the document, the LHA supports the submission of the plan and looks forward to working with Oadby and Wigston Borough Council in its delivery.	
18.12.17	Leicestershire County Council	The LHA also recognises the challenges associated with accommodating significant further growth over and above that which is outlined within the draft local plan and confirms that further evidence would be required as to the impact of additional proposed development on the highway network and appropriate mitigation.	Comment noted.
18.12.17	Leicestershire County Council	<p>Policy 6 High Quality Design and Materials:</p> <p>Whilst the high quality design and materials are welcomed, it is also important to consider ongoing / long-term maintenance. As non-standard materials can be more costly to maintain, suitable resource should be secured to fund ongoing long-term maintenance.</p> <p>It should be noted that the County Council's maintenance policy cannot be amended to supply additional maintenance for new and enhanced areas / items.</p> <p>There is concern about the amount of tree planting in the highway and potential maintenance/safety implications. There are significant underground services in the public highway within Oadby/ Wigston that will restrict where certain features can be located (trees / signs / cycle stands etc.). This needs careful</p>	<p>Comment noted.</p> <p>All development proposals that affect the highway will be appropriately consulted on with Leicestershire County Council as the local highways authority. All development proposals that seek a change to or creation of new public realm would need to take account of the Council's Public Realm Strategy, and where relevant Area Action plan Guidance.</p> <p>The Council will consider the on-going maintenance cost when considering the design of public spaces or the highway.</p> <p>Any development proposal that seeks the provision of new trees on or close to the highway will be consulted on with Leicestershire County Council as the local highway authority. Development proposals seeking provision of trees would also need to undertake the</p>

		consideration and investigation. This also applies to underground drainage systems e.g. highway, private or other culverted ordinary watercourse.	appropriate investigatory work to ensure that no underground services would (and / or could) be affected.
18.12.17	Leicestershire County Council	Like previous local plans there is mention of encouraging installation of Electric Vehicle (EV) charge points for new developments but no mention of encouraging/supporting EV charge points for existing developments or for on-street charging. This will be needed if Oadby & Wigston is going to encourage EV's into the town centre and encourage existing residents to move to EV to meet national carbon reduction targets and air quality legislation.	<p>Comment noted. The Council is proposing minor modifications to the Local Plan from the comments received from Leicestershire County Council for the reasoning set out below.</p> <p>To encourage the provision of electric vehicle charging points in existing car parking facilities, both on and off street, the Council is proposing the following wording amendment for paragraph 9.9.5 –</p> <p><i>'...should be introduced for an agreed number of spaces to encourage electrical vehicle use. The Council will also encourage provision of electric charging points at existing parking facilities'.</i></p>
18.12.17	Leicestershire County Council	The Sustainability Assessment shows that a decline in biodiversity is expected as a result of the local plan. This seems to be accepted as just what's going to happen.	<p>Comment noted.</p> <p>The levels of growth that the Council is expected to accommodate over the Plan period up to 2031 has required the Council to look beyond the existing extent of the urban area and allocate greenfield land. The Council however is committed in providing development that has the minimum negative impact to the Borough's green and open spaces and areas that are important due to their biodiversity and geodiversity.</p> <p>Local Plan Policy 8 Green Infrastructure seeks a net gain in Green Infrastructure through the preservation and enhancement of open spaces and assets that comprise the Borough's Green Infrastructure and its network.</p> <p>Local Plan Policy 37 Biodiversity and Geodiversity supports development proposals that proactively seek a net gain in geodiversity and biodiversity. The policy also</p>

			states that development that conserves, protects and enhances biodiversity and geodiversity will be supported by the Council.
18.12.17	Montagu Evans (University of Leicester)	<p>Strategic Context</p> <p>The University has significant economic, social, cultural and environmental roles and impacts within the Borough and it is important that the Local Plan acknowledges both these existing impacts and roles and the scope for the University's growth and investment to reinforce and enhance these. The University's land holdings combined with investment in the Borough has the potential to be a major contributor towards meeting some of the strategic needs identified by the Council in the PSLP.</p> <p>The spatial strategy for the PSLP takes into account the wider Leicester and Leicestershire Housing Market Area and the Leicester Principal Urban Area (PUA). This is obviously important as whilst the University's physical campus is located within the neighbouring authorities, the University owns and manages significant land holdings within the planning jurisdiction of Oadby and Wigston Borough Council. Most notably this includes the halls of residence and sports grounds located within the north of the Borough, along Stoughton Drive South, Manor Road and Stoughton Road.</p>	Comment noted.
18.12.17	Montagu Evans (University of Leicester)	<p>The Strategic Growth Plan</p> <p>One of the key elements of the Strategic Growth Plan, which deals with the time period up to 2050, is the potential delivery of a vehicular expressway to the south and east of Leicester that links the M1 motorway with the A6, the A47 and the A46 (the Eastern District Distributor Road). The Council acknowledge that the expressway will significantly improve access to the motorway network, unlock new land for development</p>	<p>Comment noted.</p> <p>It should be noted that the Eastern District Distributor Road (EDDR) does not comprise the vehicle expressway that is proposed within the Leicester and Leicestershire Strategic Growth Plan. They are two very separate entities, one local in its impact (the EDDR / potential transport route), and one very strategic in nature (the vehicle expressway linking the M1, A6, A46 and A47). It should also be noted that the EDDR /</p>

		<p>and reduce the high levels of traffic and congestion in both the borough and the City of Leicester. It is not clear from the Evidence Base currently available how the Council or its HMA partners have reached this conclusion on the deliverability of the expressway, or what efforts have been made to progress the scheme. This is somewhat surprising given the significant opportunities it could deliver in terms of housing, transport and delivery of strategic priorities both for the Borough and the wider Housing Market Area (MHA).</p> <p>We note that the Council propose to commit to a review of the Local Plan within 5 years of the date of its adoption by which time it considers the proposals for the new expressway will be at a more advanced stage, and therefore its effects within the Borough will become a policy consideration. Again the evidence base for this assumption has not been provided and given that policies within the new Local Plan will mean that the expressway is a material consideration (e.g. Policy 18 Stoughton Grange Direction for Growth area and Oadby Cemetery Allocation) from adoption we consider that this evidence should be prepared and available for consideration at this stage. This is important because the consequences of not progressing it are significant in relation to long term housing delivery and also the ability to address any shortfall in both the Borough and the HMA in the medium term.</p>	<p>potential transport route is safeguarded for utilisation in the Local Plan period up to 2031 and the vehicle expressway proposed within the Strategic Growth Plan is relevant to development delivery post 2031.</p> <p>The vehicle expressway proposed within the Leicester and Leicestershire Strategic Growth Plan is not a material consideration, nor is it a policy consideration within the Council's Local Plan.</p> <p>The Leicester and Leicestershire Strategic Growth Plan is being consulting on publicly between the 11th January and the 5th April 2018.</p> <p>It should be noted that the housing delivery proposed within the Local Plan is not reliant on the delivery of the EDDR / potential transport route. The delivery is also not dependant on any proposals set out in the Leicester and Leicestershire Strategic Growth Plan due to the growth plan considering growth post 2031 only.</p>
18.12.17	Montagu Evans (University of Leicester)	<p>Duty to Cooperate</p> <p>The University supports the duty-to-cooperate and suggests that the borough continues to explore how housing demands from across the HMA can be accommodated within suitable areas in the Borough across the period of this Local Plan.</p>	Comment of support noted.

		The University has significant land holdings within the Borough and is willing to explore with it and other HMA partners how this land could potentially be used to help address housing and other strategic needs. This is discussed further under Chapter Six (Housing Delivery) below.	
18.12.17	Montagu Evans (University of Leicester)	<p>Chapter Two – Spatial Portrait</p> <p>The University welcomes the statement at paragraph 2.3.11 (Social Characteristics) of the PSLP that the University of Leicester currently acts as one of the major land users, employers and catalysts (in Oadby) for inward investment in the Leicester Principal Urban Area (PUA), as well as within Oadby itself.</p> <p>The PSLP recognises that the University has had a presence in the Borough for over 50 years and during this time has expanded its facilities which now provide student accommodation, conferencing and sports facilities. The sports facilities are considered to be used and enjoyed by local clubs and groups. The University acknowledges as correct the statement in paragraph 2.3.11 that it <i>"plans to continue improving and expanding its facilities and replacing outdated accommodation"</i>.</p>	Comment of support noted.
18.12.17	Montagu Evans (University of Leicester)	<p>Chapter Four - Sustainable Places</p> <p>The PSLP recognises that much of the University of Leicester's student accommodation, conferencing facilities and sports and recreational facilities are based at their campus in Oadby.</p> <p>The University is committed to investment in their Oadby campus towards further education, skills, enterprise and academic growth. The information provided at the beginning of this letter and set out in Table 1 provides an indication of the University's</p>	<p>Comment noted.</p> <p>The Council would always encourage the production of a Masterplan for development that seeks more than small scale change, however it is aware that not all development proposals are subject to a Masterplan.</p>

		<p>expected growth, some of which will be diverted towards Oadby.</p> <p>Paragraph 4.4.3 states that the Council "<i>continues to support the general principle of enhancement of the University of Leicester's Oadby Campus, however would encourage the preparation of a long term framework for its future development</i>".</p> <p>The University is committed to liaising and consulting with the Borough Council in relation to any future developments. As our previous representations have highlighted, small scale investment in the campus could be undertaken on a piecemeal basis or through the development and/or redevelopment of individual buildings. We consider 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. Furthermore, we consider a bespoke policy supporting clearly defined objectives would be useful in this regard. This would afford the Council control over such matters. The University would welcome the opportunity of discussing such a policy with the Council.</p>	
18.12.17	Montagu Evans (University of Leicester)	<p>Chapter Five – Cohesive Communities</p> <p>The University supports the objective of Policy 4 (Creating a Skilled Workforce) which sets out that the Council will support development proposals that relate directly to the development of local skills, and training opportunities, particularly for young people and residents who are unemployed.</p>	Comment of support noted.
18.12.17	Montagu Evans (University of Leicester)	<p>Policy 9 (Open Space, Sport and Recreation Facilities) states that the Council will seek to protect existing sites from development where there is a demand to retain them, they contribute towards the Green Infrastructure</p>	<p>Comment of support noted.</p> <p>The Council is proposing minor modifications to the Local Plan from the comments received from Montagu</p>

		<p>in the Borough, and the equivalent cannot be provided elsewhere. The policy states that existing open space, sport and recreational buildings and land, including playing fields, should not be developed or lost unless <i>"the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location"</i>.</p> <p>The University agrees with the approach in Policy 9 that qualitative improvements to open space, sport and recreation facilities could potentially be achieved in the borough through the relocation, in certain instances, of existing facilities.</p> <p>We suggest that paragraph 5.6.13 of the PSLP which sets out that <i>"all areas of open space, sports and recreational facilities will be protected and retained, not just those identified within the Council's open space study and annual audits"</i> is amended to better reflect the policy of allowing re-provision as permitted for under Policy 9.</p> <p>We note that the Oadby and Wigston Playing Pitch Strategy is still being drafted and has yet to be finalised.</p> <p>If it would be helpful to the Council, the University would be happy to assist through provision of any evidence that might help inform this strategy.</p>	<p>Evans for the reasoning set out below.</p> <p>To clarify the purpose of paragraph 5.6.13, the Council propose the following amendment to the paragraph –</p> <p><i>'all areas of open space, sports and recreational facilities will be are relevant to Policy 9 and protected and retained, not just those identified within the Council's open space study and annual audits'</i></p>
18.12.17	Montagu Evans (University of Leicester)	<p>Chapter Six – Housing Delivery</p> <p>The Council's Housing and Economic Development Needs Assessment (HEDNA) (2017) sets out that there is an Objectively Assessed Need of 148 new homes per annum from 2011 up to 2031 (a total of 2,960) in the Borough. The PSLP states that the Council is aware that the City of Leicester has declared an unmet need and</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>Local Plan Policy 2 Spatial Strategy for Development within the Borough states at paragraph 4.2.11 that the Council has identified a number of additional new homes (in addition to the 2960 Plan target) that could be delivered should there be need to do so. The</p>

		<p>will require help from other Leicester & Leicestershire HMA partners up to 2031 however the Council proposes to meet only its own need during the plan period.</p> <p>We understand that following publication of the HEDNA for the HMA, both Leicester City Council and Oadby & Wigston Borough Council declared that they would not be able to accommodate their full OAN for housing within their own boundaries. Letters were sent out by the Council in March 2017, to all other authorities within the HMA, setting out the position and the Council's formal declaration of unmet housing need.</p> <p>Since that time the Council now consider that it will be able to accommodate its needs in the period 2011-2031 but not in respect of the period 2031-2036. This position was set out in a further letter in November 2017.</p> <p>The PSLP states that the HMA authorities, Leicestershire County Council and the Leicester and Leicestershire Enterprise Partnership (LLEP) are producing a (non statutory) Strategic Growth Plan that will act as the strategic planning framework for the HMS up to 2050. However the process of preparing the Strategic Growth Plan is not anticipated to be complete until the end of 2018.</p> <p>We note that the Council took a paper titled "Joint Statement of Co-operation Relating to Objectively Assessed Need for Housing" to Full Cabinet on 5 December 2017 which was prepared to demonstrate that all of the planning authorities are working together to meet the requirements of the duty to co-operate.</p> <p>This statement states at paragraph 2.9 that Oadby & Wigston Borough Council are yet to formally and finally</p>	<p>paragraph states that the additional homes would negate any potential delivery issues on allocated sites within the Borough and could help fulfil a small proportion of Leicester City's unmet need.</p> <p>It is incorrect to suggest that the Council is only seeking to meet only it's on need. The Council under the Duty to Cooperate is working with all other local authorities within the Leicester and Leicestershire HMA on a consistent and ongoing basis.</p> <p>The paragraph referred to in the comments (para 2.9 of the Joint Statement of Co-operation Relating to Objectively Assessed need for Housing) does state that the Borough Council is yet to formally and finally evidence the extent of their unmet need, however it is only relevant for the period 2031 onwards. Post Plan period the Council has yet to evidence its housing or employment need. The evidence and strategy for delivering development post 2031 will be dealt with through the production of the Leicester and Leicestershire Strategic Growth plan.</p> <p>It must be noted, that the vehicle expressway proposed within the Strategic Growth Plan is different to the EDDR / potential transport route safeguarded through the Local Plan. The vehicle expressway is to be evidenced through the production of the Strategic Growth Plan is to be constructed post Plan period.</p> <p>The Council has been in discussions with the University regarding their land holdings and will continue to work proactively with the University regarding masterplanning and future uses of their assets.</p>
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		<p>evidence the extent of their unmet need.</p> <p>Post 2031, the PSLP states that the strategy set out in the Strategic Growth Plan, for this period, will come into effect. One of the key elements to this strategy is the delivery of the expressway. As stated in our representations on Chapter One, given the importance of the expressway for meeting housing delivery and also providing some certainty on proposed allocations and safeguarded land, the lack of clarity on the realistic deliverability of the expressway is concerning and should be addressed.</p> <p>Although, both the Council and the Joint Statement of Co-operation note that further work on capacity is still being undertaken, however, it is considered that even with new sites coming forward there will not be enough housing land in the HMA, to meet the full housing need.</p> <p>The University wishes to discuss with the Council the opportunity to potentially promote some of their land for housing. For example, UoL owns a seven hectare site on Stoughton Road, Oadby which is considered to be appropriate for approximately 150 to 200 new dwellings.</p> <p>The University is especially interested in discussing how existing residential properties, currently utilised by students, can be freed up for housing within the HMA, and the development of PBSA,, would be a method in achieving this.</p>	
18.12.17	Montagu Evans (University of Leicester)	In relation to housing choices within the Council the University agrees with Policy 11 which supports the development of student halls of that meets an identified need and is proposed in appropriate sustainable locations.	Comment of support noted.
18.12.17	Montagu Evans	Chapter Seven – Allocations and Regeneration	Comment noted.

	(University of Leicester)	<p>Opportunity</p> <p>The PSLP identifies three areas for growth in the Borough and has allocated land accordingly. The northerly part of the Borough, along Gartree Road and Stoughton Road in Oadby is recognised as a growth area, and is referred to as Stoughton Grange Direction for Growth. This Growth Area is located on the opposite side of Stoughton Road to the University's sports fields. Policy 18 refers to the Stoughton Grange Direction for Growth area and Oadby Cemetery Allocation. This allocation sets out that the Green Wedge designation will remain to the east of the site that is currently in use as the University's playing fields as well as arable land.</p> <p>As set out or comments on Chapter Six (Housing) the University would like to discuss with the Council the potentially promotion of some of their land for housing, including a seven hectare site on Stoughton Road, Oadby which is considered to be appropriate for approximately 150 to 200 new dwellings.</p>	
18.12.17	Montagu Evans (University of Leicester)	<p>Chapter Eight – Economic Prosperity Sustainable Transport and Initiatives</p> <p>An area of the University's land at Manor Road Sports Centre and Southmeads Field has for some time been safeguarded through the adopted Core Strategy for the delivery of a "Potential Transport Route" (former Eastern District Distributor Road). The Council propose to retain this safeguarding in the new Local Plan. The Council's Local Transport Plan Phase 2 Study, which forms part of the Evidence Base, concludes that on the basis of preliminary studies it would not be appropriate to remove the safeguarding at this stage as further evaluation is required. Observations form Leicestershire County Council Highways Authority</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>As part of the evidence base for the Local Plan, the Council, in collaboration with Leicestershire County Council, Harborough District Council and Leicester City Council, commissioned Edwards and Edwards Consultancy Ltd to produce the South East Leicestershire Transport Study. Part of the remit of the study was to assess the likely impact of the potential transport route should it be built out.</p> <p>The study concluded that, should the route be built out, there would be likely benefits to traffic undertaking orbital movements linking the Fosse Park industrial /</p>

		<p>conclude that the preliminary work indicates that such a road would appear to have some merits.</p> <p>The continued safeguarding of the University's land in the context of this preliminary work and current lack of certainty on delivery, constrains that part of the University's land reserved for the Potential Transport Route's alignment and also to some extent the development potential of some of its estate.</p> <p>The NPPF states that Local Plans should be aspirational, but there is also a requirement for them to be realistic. The University considers that further evidence should be provided or an early review undertaken in relation to the deliverability of the Potential Transport Route and a programme provided for advancing it in the short term in order for the project to be considered realistic. In the absence of this we consider that any ongoing safeguarding would be unsound.</p>	<p>commercial areas and the M1 junction with the PUA area to the East of Leicester City. The results also show that traffic from Oadby and Wigston would potentially make use of the scheme using Brabazon Road to access the A6 rather than using the B582 through New Street in Oadby.</p> <p>For this reason, the Borough Council, City Council and County Council consider it is justified that the route be safeguarded through this Local Plan.</p>
18.12.17	Montagu Evans (University of Leicester)	<p>Chapter Ten – Protected Places</p> <p>We note that Policy 42 (Green Wedges) allows outdoor leisure, recreation and sporting facilities to be developed within Green Wedges. As set out in our previous representations 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>Our previous suggestion to incorporate 'indoor leisure facilities' into this policy was considered by the Council and the Officer's response to this, as set out in the "Local Plan Preferred Options Consultation Representations November to December 2016 - Officer Responses" document, confirmed that the wording of Policy 42 would be amended to include "<i>and related</i></p>	<p>Comment noted. The Council is proposing minor modifications to the Local Plan from the comments received from Montagu Evans for the reasoning set out below.</p> <p>To clarify the intention of Local Plan Policy 42 Green Wedges the Council proposes the following minor amendment to bullet 6 –</p> <p><i>'Outdoor leisure and recreation, and outdoor / indoor sporting facilities'</i></p>

		<i>indoor leisure'</i> . We note that this amendment has not been made in the current PSLP Policy and request again that the Officer's amendment is made.	
18.12.17	Pegasus Group (Oadby Grange)	<p>Support/Object: Object</p> <p>Consultation Point: Policy 2 – Spatial Strategy for Development within the Borough</p> <p>Representation:</p> <p>Policy 2 of the draft Local Plan identifies a requirement to allocate land for 2,960 homes over the plan period (148 per annum). This seeks to deliver the full objectively assessed need of 148dpa [see paragraph 4.2.5] as identified in the Leicester and Leicestershire HEDNA, January 2017.</p> <p>The overall approach of the HEDNA broadly reflects the approach advocated in the NPPG. However, a number of the specific assumptions would either benefit from clarification or are not supported as described below:</p> <p>Concerns about the HEDNA</p> <p>1) Table 1 of the HEDNA identifies that the population growth of the HMA was consistently under-estimated during the intercensal years, owing to un-attributable population change (UPC). This is broadly recognized as being attributable to two factors, namely a potential misenumeration in one or other of the Census's (with either the 2001 Census under-estimating the actual population or the 2011 Census over- estimating the actual population) or an error in the estimated migration flows during the intervening years. It is impossible to attribute the UPC to one or the other of these factors, and so a large number of consultants preparing HEDNA's (including Neil McDonald who is</p>	<p>Comment noted.</p> <p>Response to these representations is set out in the Local Plan Spatial Strategy Submission document that the Council has produced for Local Plan Submission.</p>

		<p>quoted as a reliable source within the HEDNA) assume that 50% of the UPC is attributable to each factor. Such an approach has also been supported by numerous Local Plan Inspectors (including Inspector Pratt at the Stroud Local Plan examination). If such an approach was applied in Leicestershire, then this would uplift the population growth across the HMA by circa 742 people per year. However, the current approach of the HEDNA is equivalent to assuming that 100% of the UPC is attributable to errors within one of the Census's without any justification in support of this.</p> <p>2) In paragraph 2.26 of the HEDNA , a number of sensitivity tests are identified. The first relates to rebasing the projection to 2015 and the second relates to applying a longer term migration trend. It is however, unclear whether the second sensitivity test also rebases the projection to 2015, which is required in order to align with the most recent evidence as required by the NPPG (2a-017).</p> <p>3) In paragraph 5.15, it is identified that changes are made to the commuting rates identified by the 2011 Census. However, the HEDNA does not identify which source (if any) the data comes from to make such an adjustment. It only alludes to "published data on jobs and population growth". This cannot be relied upon without the necessary reference as it is not justified in any way. Furthermore, data on jobs and population growth does not provide the necessary information about how those people and jobs interact through commuting. The only publicly available information on commuting rates is taken from the Census and this has the added advantage of being comprehensive as all households are legally required to submit returns. It would be virtually impossible to justify any adjustment from the comprehensive and robust figures provided by</p>	
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		<p>the Census in the absence of a comprehensive collection of primary data such as a survey with a high response rate (i.e. a new local Census).</p> <p>4) In paragraphs 5.18 to 5.32, various sources for the employment rates are considered. It is identified that the OBR rates take account of the participation rates of different cohorts. These cohort-specific participation rates are a key determinant of the likely future workforce owing to the significant variance in participation of various cohorts (for example, a 16 or 64 year old is far less likely to be in full time employment than a 45 year old). The OBR rates also estimate the impacts of specific policy factors such as the change to retirement ages. These therefore provide robust and credible rates as relied upon by the Government. However, the HEDNA dismisses these and instead relies upon Experian rates which simply assume 80% participation without any justification and without taking any account of the participation rates of different cohorts, all of which is inconsistent with the Government's analysis (prepared by the OBR). Such an assumption relies upon a fundamental change in participation rates across all cohorts. In particular this requires that older people continue to work for a far longer period, regardless of their health and their ability to undertake more manual tasks. This departure from current rates is clearly a policy-on adjustment which should not be used to inform the objectively assessed need.</p> <p>The preceding analysis suggests that the objectively assessed need of 148 homes per annum, identified by the Council is not robust and that it should be increased.</p> <p>It is recognised that the DCLG have recently published</p>	
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		<p>the "Planning for the right homes in the right place" consultation which suggests that the objectively assessed need for Oadby and Wigston should be 133 homes per annum. However, a potential flaw with the standardised methodology is that because it projects forward past growth trends they will often result in a low OAN where growth has in the past been constrained. It should be noted that the housing requirement of the Oadby and Wigston Core Strategy was only 90dpa. In any event this document is still subject to consultation and as such cannot be afforded significant weight.</p>	
18.12.17	Pegasus Group (Oadby Grange)	<p>Unmet Housing Needs</p> <p>The draft Local Plan does not allocate any housing sites to act as a contingency to address the unmet needs of neighbouring authorities or to ensure that the objectively assessed need is delivered, and to provide choice and flexibility to the market.</p> <p>The unmet needs of neighbouring authorities are unknown at present, although a final Memorandum of Understanding is due to be published in January 2018 which will detail the distribution across the authorities. This will be necessary to demonstrate that the duty to cooperate has been met. Pegasus Group therefore reserve the right to make further representations once this is available.</p> <p>However, in the interim, the Emerging Options consultation for Leicester City identifies a housing requirement which produces a shortfall of between 7,900 and 15,000 homes (or 395 to 750 per annum). The draft Oadby and Wigston Local Plan acknowledges</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The Council's Local Plan allocates sufficient land to meet its own Objectively Assessed Needs in full. The Local Plan also identifies a residential 'buffer' of approximately 400 new homes, which would negate any potential delivery issues on allocated sites in the future, but also could help fulfil a small proportion of Leicester City's unmet need.</p> <p>The Borough area of Oadby and Wigston is unique in England and comprises a small compact urban area, adjacent to the major City of Leicester. The Borough area is constrained by a number of factors, including land availability; however its key constraint is its severely congested transport and highway infrastructure network. As illustrated by the South East Leicester Transport Study, the scale of development identified within the Council's Local Plan up to 2031 can just be accommodated, however with required mitigation. Additional development over and above that</p>

		<p>that the LPA is aware of the fact that Leicester City has declared an unmet need and that it will need help from other HMA partners to deliver its unmet needs up to 2031 [paragraph 4.2.5].</p> <p>These unmet needs of Leicester City are likely to be most sustainably met within the authorities which neighbour the City, namely Blaby, Oadby & Wigston, Harborough and Charnwood. If as a broad proxy it was assumed that each of these were required to meet a quarter of the unmet needs of Leicester City, this would produce an additional requirement for 99 to 188 homes per annum in each authority which the draft Local Plan does not allow for. This alone (although based on a very crude distribution) suggests that the housing requirement proposed in the draft Local Plan will be insufficient to meet the identified objectively assessed needs (which in themselves are under-estimated) including the unmet needs of Leicester City across the HMA.</p>	<p>identified within the Local Plan could seriously undermine the deliverability of the development identified in the Plan.</p> <p>The Council considers that the suggestion of up to 188 additional new homes per annum in addition to the 148 new homes per annum identified in the Local Plan is unfounded. As the Council has mentioned, the Borough's transport and highway infrastructure network can just meet (with required mitigation) the 2960 over the Plan period (up to 2031) (148 per annum), let alone an additional (up to) 188 new homes per annum. Such levels of development suggested by Pegasus, for the size of the Borough would just not be deliverable or appropriate.</p>
18.12.17	Pegasus Group (Oadby Grange)	<p>Affordable Housing</p> <p>Paragraph 12.18 of the HEDNA identifies that there is a significantly greater discrepancy between the OAN and the number of homes required to address affordable needs in Oadby & Wigston than there is elsewhere in the HMA.</p> <p>An uplift in housing provision of 390% in Oadby & Wigston would be required to meet the full affordable housing need. Whilst an uplift on this scale would be unrealistic and would not be deliverable, the identified OAN of 148dpa provides for only 23% of the 632dpa required to meet the affordable need in full.</p> <p>NPPG (2a-029) requires that "An increase in the total housing figures included in the Local Plan should be</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The Council considers that the assumptions and conclusions of the Leicester and Leicestershire Housing Economic Development Needs Assessment (HEDNA) are robust and justified. All of the local authorities within the Leicester and Leicestershire Housing Market Area have accepted the outcomes of the HEDNA and approved the Joint Statement of Co-operation Relating to Objectively Assessed Need for Housing (November 2017). The joint statement sets out that up to 2031 the local authorities within the Leicester and Leicestershire Housing Market Area have sufficient capacity to meet the Leicester and Leicestershire Housing Market Area OAN for housing. The statement sets out that the theoretical total housing capacity of the Leicester and</p>

		<p>considered where it could help deliver the required number of affordable homes." This need is particularly acute in Oadby & Wigston and so consideration should be given to a housing requirement significantly in excess of the OAN to provide the opportunity for a reasonable proportion of the affordable needs to be met.</p> <p>The LPA has previously indicated that there is a lack of capacity within the authority area to deliver housing but as explained in other representations prepared on behalf of Mrs B A Walker there is additional land at Oadby Grange which does have potential to deliver additional housing (including affordable housing) which can assist in meeting the housing shortfalls.</p>	<p>Leicestershire Housing Market Area exceeded the OAN for housing by over 100,000 new homes. In addition, all local authorities within the Leicester and Leicestershire HMA have been working together on the production of the Leicester and Leicestershire Strategic Growth Plan.</p> <p>In addition, the HEDNA has been found sound and robust evidence base at the recent North West Leicestershire Local Plan Examination in Public. Therefore, the assumptions and conclusions within the HEDNA conform to national policy and guidance set out in the NPPF and NPPG.</p> <p>The Council considers that Local Plan Policy 13 Affordable Housing illustrates the Council's commitment to the provision of affordable housing to meet the Borough's needs in a sustainable and viable way. The threshold and targets are evidenced by the Council's Affordable Housing Viability Assessment, as well as the Council's Whole Plan Viability Study evidence base work.</p>
18.12.17	Pegasus Group (Oadby Grange)	<p>Housing Delivery and Contingency</p> <p>Table 1 of the draft Local Plan identifies past completions and commitments and deducts these from the Housing Requirement of 2,960 to establish a residual requirement of 1,614 homes which need to be allocated. However, this takes no account of lapse rates for current commitments or future allocations. It would be unrealistic to assume that all of these sites will deliver in their entirety. The LPA is therefore trying to be overly precise and it would be sensible to identify additional allocations to provide greater certainty.</p> <p>At paragraph 4.2.11 the draft Local Plan indicates that there would be a "buffer" of approximately 400</p>	<p>Comment noted.</p> <p>Response to these representations is set out in the Local Plan Spatial Strategy Submission document that the Council has produced for Local Plan Submission..</p>

		<p> dwellings if there were any deliverability problems and this could also help fulfil a “small” proportion of Leicester City’s declared unmet need.</p> <p> However, it should be noted that the draft plan does not actually allocate any of these sites and it does not therefore provide any such contingency.</p> <p> With regard to the 40 homes that could be delivered within Kilby Bridge, this would normally be considered as windfall development within the settlement boundary of a rural settlement.</p> <p> If the 40 dwellings are to be dispersed across a number of small sites then it is unlikely to deliver affordable housing. Moreover, Kilby Bridge is a rural settlement, constrained by floodplain and is at the southernmost part of the District [see para 7.1.1]. If other sites fail to deliver, then housing at Kilby Bridge is not going to meet those needs in the most sustainable location.</p> <p> Reference to the windfall allowance is noted but this is expected to come forward anyway and should be read alongside the fact that the housing requirement is expressed as a minimum in any event.</p> <p> It is noted that reference is also made to a possible Phase 3 at Wigston Direction for Growth Area but paragraph 4.2.12 indicates that this has not been tested and it is envisaged that it would come forward post 2031 at paragraph 4.3.6. Therefore, even if this site does deliver it will not contribute to the housing requirement.</p> <p> Given the concerns already identified above about the OAN and unmet needs it is anticipated that more land will be required than the unallocated buffer of 400 units that the draft plan alludes. The Local Plan itself also appears to recognise that this buffer would only help to</p>	
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		fulfil a "small" amount of Leicester City's unmet needs, all of which indicates that there is a need for additional sites.	
18.12.17	Pegasus Group (Oadby Grange)	<p>Site Selection</p> <p>Policy 2 identifies individual site allocations and Direction for Growth Areas where residential development is to be delivered. The larger allocations are then identified in Chapter 7 and through Policies 18, 20 and 21.</p> <p>As explained in more detail in the other representations relating to Chapter 7 it is considered the Sustainability Assessment has not demonstrated that the proposals in the plan are the most appropriate. In particular the SA has failed to consider the Land at Oadby Grange, which forms a reasonable alternative. The omission of this and other reasonable alternatives has been found to be unlawful by Mr. Justice Mitting in the High Court Judgment of the City and District Council of St Albans vs Secretary of State for Communities and Local Government et al [2009] EWHC 1280 (Admin). Had this site been considered as a reasonable alternative, it is considered that the Local Plan would have proposed this as an allocation given its sustainability credentials.</p>	<p>Comment noted.</p> <p>In relation to the suitability of the land at Oadby Grange it is of note that the Council had not been made aware the recent interest in bringing the land forward, prior to the Local Plan Pre-Submission Consultation stage. It was only made aware through Pegasus Planning's submission on the 18th December 2017 (the closing day for the Local Plan Pre-Submission Consultation). Therefore this land has not:</p> <ul style="list-style-type: none"> • Been assessed by the Council through the Strategic Housing Land Availability Assessment since 2013, or • Been submitted to the Council for consideration during any of the Call for Sites processes that have been undertaken by the Council for the purposes of Local Plan preparation. <p>Furthermore, this land has been subject to a Section 106 Agreement between Mr Thomas Watson Walker, the Borough Council and Leicestershire County Council. The original S106 Agreement dates back to 2001. Throughout the time of the agreement, the Council has been in discussions with the land owner to provide a publically owned country park, hence the land area ceasing to be considered by the Council for built development post 2013 (alongside a lack of developer or site promoter interest).</p> <p>The land has previously been included in the Council's SHLAA process due to it being considered through the Council's Allocations Issues and Options Public</p>

			<p>Consultation 2007. It has not been promoted by an external land agent or land owner.</p> <p>In addition, the Oadby Grange site, is situated in designated Countryside and does not have direct access onto one of the Borough's main highway and transport routes (A Road or B Road). The site is located to the very edge of an existing residential estate, approximately 0.7 miles from the nearest main route, the A6. It should also be noted that the site did not form part of the South East Leicestershire Transport Study, therefore has not been taken account of from a cumulative transport / highway testing perspective.</p> <p>It is important to note, that the Council, throughout the preparation of the Local Plan, has considered sites that have been promoted to the Council through the numerous Local Plan Call for Sites processes undertaken and the SHLAA Call for Sites process undertaken. The Council has considered sites that have known developer interest and have been informed regarding a sites availability, achievability and suitability.</p> <p>To reiterate, the Council has not been made aware of the site being promoted by Pegasus Planning during the Local Plan process, until the Pre-Submission Local Plan Consultation final day for representations, therefore the Council considers that it is inappropriate to say that the Council has not considered the site, in particular through the Sustainability Appraisal process, as the Council was unaware of it.</p>
18.12.17	Pegasus Group (Oadby Grange)	<p>Support/Object: Object</p> <p>Consultation Point: Policy 6 – High Quality Design and Materials</p> <p>Representation:</p>	<p>Comment noted.</p> <p>The Council considers that the reference to the highest standards of inclusive design and use of the highest quality materials for all new development is</p>

		<p>The Objector acknowledges that the NPPF at paragraph 56 states that the Government attaches great importance to the design of the built environment. The principle of good design is not therefore something which is disputed.</p> <p>However, the terminology used in Policy 6 is somewhat extreme. It requires the “highest” quality of inclusive design and the use of the “highest” quality of materials. This sets the bar at a level which is unnecessarily high.</p> <p>To require all development to use the highest quality materials is excessive. What may be appropriate for a rear extension in a residential area might be very different to what is required for a prominent listed building in the town centre. What is appropriate and necessary for one type of development might be very different for another type of development.</p> <p>Whilst the intentions of the policy are laudable, the wording highlighted above should be amended to be more in line with the reasonable expectations for achieving good design and high quality development.</p> <p>This is also necessary to ensure that planning policies are not imposing unjustified standards and burdens on new development which has implications for viability and delivery of much needed development (see the related guidance in NPPF paragraphs 173 and 174).</p> <p>Summary of representation (if it is more than 100 words in length): The requirements in Policy 6 to achieve the “highest” quality of inclusive design and to use the “highest” quality of materials is excessive and unnecessary.</p>	<p>appropriate. The Council is aware that the NPPF suggests that it is important to plan positively for the achievement of high quality and inclusive design for all development; it seeks to strive further in design terms.</p> <p>The Council however would have no objection to the policy wording being amended, for example ‘highest’ being replaced with ‘high’.</p>
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		<p>Changes: The wording in Policy 6 should be toned down to still maintain the principle of good design but to not impose unnecessary and excessive requirements.</p>	
18.12.17	Pegasus Group (Oadby Grange)	<p>Support/Object: Object</p> <p>Consultation Point: Policy 7 – Community Facilities Representation:</p> <p>Policy 7 requires development proposals to provide on-site and/or off-site new or enhanced community facilities to meet any needs arising from new development.</p> <p>The principle is not disputed but the policy should clarify that such requirements will only be imposed where there is a deficit in the capacity of existing facilities which must be mitigated to make the development acceptable. Any such requirement must accord with the CIL regulations and NPPF paragraph 204 which states that planning obligations should only be sought where they meet all of the following tests:</p> <ul style="list-style-type: none"> - necessary to make the development acceptable in planning terms; - directly related to the development; and - fairly and reasonably related in scale and kind to the development. <p>Summary of representation (if it is more than 100 words in length): Policy 7 does not make it clear that new or enhanced provision of community facilities will only be required where there is a lack of capacity in existing facilities and that such works will only be required (and at a scale) where it is necessary to mitigate the impacts of the development.</p>	<p>Comment noted.</p> <p>The Council is proposing minor modifications to the Local Plan from the comments received from Pegasus Planning for the reasoning set out below.</p> <p>To ensure clarity within the Council’s Local Plan, however to avoid unnecessary repeating of national policy and guidance, the Council is proposing the following wording addition to Local Plan paragraph 5.4.5 –</p> <p><i>‘...community facilities within the Borough. Any developer contributions sought will be in accordance with the Borough Council’s Developer Contributions Supplementary Planning Document’.</i></p> <p>The Council’s Developer Contribution SPD seeks developer contributions in conformity with government guidance, policy, legislation and regulations, therefore the Council does not consider it appropriate to repeat such within the Local Plan Policy. As the Council will only be seeking developer contributions in conformity with the Developer Contributions SPD, therefore in conformity with CIL legislations / regulations, it will not be burdening development proposals with undue costs; it will be seeking contributions that are required by the planning process for mitigation purposes.</p>

		<p>Changes: Amend the wording in Policy 7 or the supporting text to clarify that any requirement for on site or off site community facilities accords with the CIL regulations and NPPF paragraph 204.</p>	
18.12.17	Pegasus Group (Oadby Grange)	<p>Support/Object: Object</p> <p>Consultation Point: Policy 9 – Open Space, Sport and Recreation Facilities</p> <p>Representation:</p> <p>Policy 9 requires new development to contribute either physically or financially to the provision of or improvement of open space, sport and recreation facilities.</p> <p>The principle of the policy is supported but any such provision from new development should only be sought if there is evidence that there is insufficient provision or capacity at local facilities (eg local playing fields or swimming pools) which means that it is necessary to mitigate against the impacts of new development.</p> <p>Summary of representation (if it is more than 100 words in length):</p> <p>n/a</p> <p>Changes:</p> <p>Amend the wording in Policy 9 or the supporting text to clarify that any requirement for improvements will only be sought if there is insufficient provision/capacity within the area.</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The Council considers that the wording of Local Plan Policy 9 as well as the supporting text to the policy is clear in relation to the amount of open space required from a development proposal. The Council also considers that the Policy (with no reference to remedying existing shortfalls) does not seek to remedy existing shortfalls in provision, nor does it seek to seek contributions to existing facilities where there is sufficient capacity available.</p> <p>As Local Plan paragraph 5.6.11 illustrates, part of the Council’s annual monitoring comprises an open space audit that assesses the provision of open space and identifies areas of deficiency and surpluses in provision of open space, sports and recreational facilities. To illustrate surplus and deficiency on a ward by ward level, the audit takes account of the population of the ward and the Council’s locally based open space requirements (it should be noted that such space requirements have been discussed and agreed with Sport England). The audit then suggests wards that are deficient in a certain open space typology and / or wards that there is a surplus in provision. This information is then taken account of when negotiating off-site developer contributions towards new open space provision.</p>

			In addition, the Council considers that as the quantity requirements are set out within the supporting text to Policy 9; the Council's Open Space Audit is specified in the supporting text to Policy 9; the Developer Contributions SPD and Playing Pitch Strategy is specified within the Policy wording and supporting text of Policy 9; and the Community Infrastructure Levy sets out that compliant infrastructure projects should satisfy the three statutory tests, as set out in CIL Regulation 122(2), all appropriate and relevant documentation is cited and available.
18.12.17	Pegasus Group (Oadby Grange)	<p>Support/Object: Object</p> <p>Consultation Point: Policy 11 – Housing Choices</p> <p>Representation:</p> <p>Requirement to “reflect” the existing character of an area.</p> <p>The requirement in Policy 11 for all residential developments to “reflect” the character of the area in which they are located is unduly prescriptive and contrary to NPPF paragraph 60 which states:-</p> <p>“60. Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.”</p> <p>Whilst it may be perfectly reasonable to require that development is sympathetic to, or respects the character of an area, this is very different to a</p>	<p>Comment noted.</p> <p>The Council is proposing minor modifications to Local Plan Policy 11 Housing Choices from the comments received from Pegasus Planning for the reasoning set out below.</p> <p>The Council considers that the following wording, which is directly relevant to the wording at paragraph 60 of the NPPF, fully consistent with national policy and guidance. The following wording amendment is proposed by the Council at paragraph 5 of Local Plan Policy 11 Housing Choices –</p> <p><i>'All residential proposals will need to promote or reinforce local distinctiveness and reflect the character of the area in which they are located.'</i></p>

		<p>requirement to “reflect” the existing character. There may be cases where it is not appropriate to reflect the character of an area and where change is desirable.</p> <p>Summary of representation (if it is more than 100 words in length):</p> <p>The requirement for all residential developments to “reflect” the character of the area in which they are located is unduly prescriptive and contrary to NPPF paragraph 60.</p> <p>Changes:</p> <p>Replace the word “reflect” with the word “respect”</p>	
18.12.17	Pegasus Group (Oadby Grange)	<p>Support/Object: Object</p> <p>Consultation Point: Chapter 7 – Failure to consider all reasonable alternatives</p> <p>Representation: Objections are made to Chapter 7 on the basis that the Sustainability Appraisal has not demonstrated that the proposals in the plan are the most appropriate given the reasonable alternatives as required by the NPPG.</p> <p>The objector’s primary position as outlined in the representations relating to Policy 2 is that the OAN is not robust and that the housing requirement should be increased for this and other reasons. This will mean that additional sites will need to be allocated for housing and the objector considers that this should include Land at Oadby Grange.</p> <p>Even if those objections are not accepted, it is considered that the site is more suitable than some of the allocated sites as explained in the other</p>	<p>Comment noted.</p> <p>The OAN forms part of the evidence base for the Local Plan which is outside of the scope of SA.</p> <p>The Land at Oadby Grange has not been appraised as a reasonable alternative through the SA given that the site was not submitted for any built development through the various Call for Sites exercises throughout the Local Plan process. The site was included in the Strategic Housing Land Availability Assessment in 2013, but was subsequently removed as discussions have been ongoing with the land owner regarding various recreational options for the site which would mean the site would not be deliverable for housing. These discussions are ongoing and the site has not been promoted or considered for any alternative use.</p> <p>The SA process has involved the identification and appraisal of reasonable alternatives for both site and policy options. In relation to the reasonable alternative sites the appraisal of those considered is presented in</p>

		<p>representations that relate specifically to those sites.</p>	<p>Appendix 5. Appendix 6 presents a summary of the Council’s reasoning for allocating or discounting sites as communicated to LUC during preparation of the SA.</p> <p>In relation to the emergence of those reasonable alternative site options considered, the previous iteration of the SA Report (Preferred Options) considered sites identified within the Council’s Strategic Housing Land Availability Assessment, sites illustrated within the town centre masterplans and Local Development Orders, and sites submitted through the Call for Sites process that have had recent developer interest. Once the SA Report for the Preferred Options Local Plan was published alongside that version of the Local Plan further sites were promoted. Once the Council had identified the reasonable alternative site options for the Local Plan they were subject to SA by LUC. The findings were presented to the Council officers preparing the Local Plan in an internal summary note in August 2016, so that the SA findings could inform decision making about which site options to take forward in the Local Plan. LUC also assessed the additional site options that came through the Preferred Options consultation and similarly passed the appraisal results onto the Council officers preparing the Plan, prior to finalisation of the Pre-Submission version of the Plan.</p> <p>In relation to the reasonable alternatives considered for the policy options in the Local Plan initially high level options for the policies to be included in the Local Plan were identified by the Council and from this reasonable alternative policy options were subject to SA by LUC during summer 2016. Findings were presented to the Council officers preparing the Plan in an internal summary note in August 2016, so that the SA findings could inform decision making about which policy</p>
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			<p>options to take forward in the Preferred Options document. The SA matrices for the reasonable alternative policy options were presented in the Preferred Options SA Report (November 2016) and these are included in Appendix 7 of the Pre-Submission SA Report. Appendix 8 of the full SA Report presents an audit trail explaining the reasons for the Council's decision making about which policy options to take forward in the Local Plan.</p> <p>As such it is demonstrated how reasonable alternative options for both sites to be allocated and policies included in the Local Plan have been considered through the SA Report process. As such the SA Report meets the requirements of the PPG and SEA Directive.</p> <p>The reasons why the Land at Oadby Grange has not been appraised as a reasonable alternative in the SA Report have been set out above.</p> <p>Furthermore given the high level nature of the SA and a requirement for a consistency between the appraisal of sites in line with the SA Assumptions it is not considered appropriate that details presented in the Site Delivery Statement should influence the outcome of the SA. This level of detail is not available for consideration for each site and therefore the information included should not influence the findings of any appraisal undertaken.</p> <p>The reasons why the Land at Oadby Grange has not been appraised as a reasonable alternative in the SA Report have been set out above.</p> <p>While site OWBC23 (which the objector has used as a proxy to compare the Land at Oadby Grange to sites which have been included for allocation) performs favourably in comparison to the noted allocated sites for some of the SA objectives the allocation of specific</p>
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			<p>sites is outside of the scope of the SA Report. Appendix 6 presents a summary of the Council's reasoning for allocating or discounting sites as communicated to LUC during preparation of the SA. The SA Report does not present a ranking of sites for allocation but merely forms part of the evidence base for the selection of sites. Issues beyond the findings of the SA Report have been taken into consideration as part of this decision making process and have thereby influenced which sites have been allocated.</p>
18.12.17	Pegasus Group (Oadby Grange)	<p>Land at Oadby Grange</p> <p>The Land at Oadby Grange has not been properly assessed and this represents an opportunity to deliver housing on a site well related to the Principal Urban Area and which is contained by mature landscape features and the topography of the area. The site is in an accessible location and is not located within a Green Wedge or affected by any designations. It also lies within Flood Zone 1 (the zone with least probability of flooding).</p> <p>The objector has prepared a Site Delivery Statement which highlights why the site is suitable for an allocation of between 270 and 320 dwellings. To avoid duplication, the merits of the site are not repeated in full here, but the document should be read in combination with these objections.</p>	<p>Comment noted.</p> <p>The reasons why the Land at Oadby Grange has not been appraised as a reasonable alternative in the SA Report have been set out above.</p> <p>Furthermore given the high level nature of the SA and a requirement for a consistency between the appraisal of sites in line with the SA Assumptions it is not considered appropriate that details presented in the Site Delivery Statement should influence the outcome of the SA. This level of detail is not available for consideration for each site and therefore the information included should not influence the findings of any appraisal undertaken.</p>
18.12.17	Pegasus Group (Oadby Grange)	<p>SHLAA</p> <p>The SHLAA proformas are not available on the LPA website but it is known that Land at Oadby Grange was tested in the 2013 SHLAA with a potential capacity of 365 dwellings. No insurmountable constraints were identified, however from a planning policy perspective the SHLAA proforma [page 36] did record the following constraint:-</p>	<p>Comment noted.</p> <p>In relation to the suitability of the land at Oadby Grange it is of note that the Council had not been made aware the recent interest in bringing the land forward, prior to the Local Plan Pre-Submission Consultation stage. It was only made aware through Pegasus Planning's submission on the 18th December 2017 (the closing day for the Local Plan Pre-Submission</p>

		<p>“Section 106 agreement stemming from development on Florence Wragg Way to provide the land as open space”</p> <p>This is a mis-representation of the s.106 agreement (a copy of which is provided alongside these representations). Whilst it is correct that the s.106 does provide for a country park around the periphery of the site it does not require the open fields that form the main part of the site to be provided as open space. The s.106 clearly identifies those parts of the site as “retained land.”</p> <p>The adopted Local Plan also mis-represented the position and identified the land as proposed recreation space. However, the land remains in private ownership and there is no intention on the part of the landowner to make the land available for that purpose.</p> <p>The related Policy R7 was therefore nothing more than aspirational. It should be noted that the LPA did consider purchasing the site but chose not to proceed with this.</p> <p>In this context, it is also relevant to highlight that the country park has yet to be handed over to the LPA because negotiations have not yet been finalised. If the site was to come forward for development there would be opportunities address this matter and also secure possible enhancements to the extent of the Country Park and/or its future management.</p> <p>It is important to note that the Pre Submission Draft Plan does not continue to identify the land as a proposed recreation area on the draft Policies Map. It simply shows the site as “countryside” beyond the built</p>	<p>Consultation). Therefore this land has not:</p> <ul style="list-style-type: none"> • Been assessed by the Council through the Strategic Housing Land Availability Assessment since 2013, or • Been submitted to the Council for consideration during any of the Call for Sites processes that have been undertaken by the Council for the purposes of Local Plan preparation. <p>Furthermore, this land has been subject to a Section 106 Agreement between Mr Thomas Watson Walker, the Borough Council and Leicestershire County Council. The original S106 Agreement dates back to 2001. Throughout the time of the agreement, the Council has been in discussions with the land owner to provide a publically owned country park, hence the land area ceasing to be considered by the Council for built development post 2013 (alongside a lack of developer or site promoter interest).</p> <p>The land has previously been included in the Council’s SHLAA process due to it being considered through the Council’s Allocations Issues and Options Public Consultation 2007. It has not been promoted by an external land agent or land owner.</p> <p>In addition, the Oadby Grange site, is situated in designated Countryside and does not have direct access onto one of the Borough’s main highway and transport routes (A Road or B Road). The site is located to the very edge of an existing residential estate, approximately 0.7 miles from the nearest main route, the A6. It should also be noted that the site did not form part of the South East Leicestershire Transport Study, therefore has not been taken account of from a</p>
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		<p>up area.</p> <p>Had the policy status of the site been properly understood earlier, the site should have been considered more favourably.</p> <p>Summary of representation (if it is more than 100 words in length): The Pre Submission Plan and the supporting Sustainability Appraisal has not considered the option of allocating Land at Oadby Grange for housing and has therefore not demonstrated that the proposals in the plan are the most appropriate given the reasonable alternatives.</p> <p>Pegasus Group has prepared a Site Deliverability Statement on behalf of the objector which identifies the merits of the site and how it could be developed. This which should be read alongside these objections.</p> <p>Changes:</p> <p>Land at Oadby Grange should be identified as an additional residential allocation to address the increased housing requirement that is likely to arise from a more robust assessment of the OAN (see objections to Policy S2.</p> <p>If those objections are not accepted, the site should still be allocated for housing as an alternative to land at Stoughton Grange or Cottage Farm (also see objections to Policies 18 and 21)</p>	<p>cumulative transport / highway testing perspective.</p> <p>It is important to note, that the Council, throughout the preparation of the Local Plan, has considered sites that have been promoted to the Council through the numerous Local Plan Call for Sites processes undertaken and the SHLAA Call for Sites process undertaken. The Council has considered sites that have known developer interest and have been informed regarding a sites availability, achievability and suitability.</p> <p>To reiterate, the Council has not been made aware of the site being promoted by Pegasus Planning during the Local Plan process, until the Pre-Submission Local Plan Consultation final day for representations, therefore the Council considers that it is inappropriate to say that the Council has not considered the site, in particular through the Sustainability Appraisal process, as the Council was unaware of it.</p>
18.12.17	Pegasus Group (Oadby Grange)	<p>The Sustainability Appraisal</p> <p>The Sustainability Appraisal that supports the Pre Submission Plan does not assess the land at Oadby</p>	<p>Comment noted.</p> <p>The reasons why the Land at Oadby Grange has not been appraised as a reasonable alternative in the SA</p>

		<p>Grange.</p> <p>It does assess the land beyond the Oadby Grange site to the east (site ref. OWBC23) which is detached from the urban area and thus clearly less suitable. Whilst that site was discounted, it acts as a crude proxy for how the Oadby Grange site might have been assessed. When that site is compared with some of the larger allocations (including OWBC 24, 28 and 44) it can be seen that on balance even that land outperformed some of the allocated sites.</p> <p>The Oadby Grange site would have similar locational characteristics, but being located immediately adjacent to the PUA, it would represent a more logical and appropriate location for development.</p>	<p>Report have been set out above.</p> <p>While site OWBC23 (which the objector has used as a proxy to compare the Land at Oadby Grange to sites which have been included for allocation) performs favourably in comparison to the noted allocated sites for some of the SA objectives the allocation of specific sites is outside of the scope of the SA Report. Appendix 6 presents a summary of the Council's reasoning for allocating or discounting sites as communicated to LUC during preparation of the SA. The SA Report does not present a ranking of sites for allocation but merely forms part of the evidence base for the selection of sites. Issues beyond the findings of the SA Report have been taken into consideration as part of this decision making process and have thereby influenced which sites have been allocated.</p>
18.12.17	Pegasus Group (Oadby Grange)	<p>Support/Object: Object</p> <p>Consultation Point: Policy 18 – Stoughton Grange Direction for Growth Area</p> <p>Representation:</p> <p>As set out in other representations on behalf of Mrs B A Walker in relation to Policy 2, the objector's primary position is that the OAN is not robust and that the housing requirement should be increased for this and other reasons. This will mean that additional sites will need to be allocated for housing and the objector considers that this should include Land at Oadby Grange.</p> <p>Even if those objections are not accepted, it is considered that the site is still more suitable than some of the allocated sites including the Land at Stoughton Grange Direction for Growth Area (Policy 18). As explained in the more general objection in relation to</p>	<p>Comment noted.</p> <p>The purpose of the Council's Green Wedge Review is to assess the boundaries of the existing green wedge designations, as defined on Council's Saved Local Plan Proposals Map and the Council's Adopted Policies Map. The review took into account the Broad Location for Growth Areas identified within the Strategic Housing Land Availability Assessment and the options for greenfield release sites identified within the Council's Preferred Options Local Plan consultation document.</p> <p>Each of the existing green wedges was assessed against the functions set out in the Leicester and Leicestershire Green Wedge Review Joint Methodology to see whether or not the current designated boundaries should be kept the same or amended.</p> <p>As stated within the review document, for the purpose of the review document the Oadby, Thurnby,</p>

		<p>Chapter 7, the Sustainability Appraisal (SA) has not demonstrated that the proposals in the plan are the most appropriate given the reasonable alternatives, as the LPA has failed to consider Land at Oadby Grange as an option for residential development.</p> <p>Land at Oadby Grange</p> <p>The merits of the Land at Oadby Grange are set out in separate representations and the attached Site Deliverability Statement and are not repeated again here to avoid duplication.</p> <p>Land at Stoughton Grange Direction for Growth</p> <p>Land at Stoughton Grange is allocated for amongst other things, 300 dwellings through Policy 18.</p> <p>The site is currently located within a defined Green Wedge. Paragraph 10.6.5 of the draft plan explains the importance of the Green Wedges and states:-</p> <p>“With the Borough being relatively compact and urban in nature, Green Wedges are extremely important; they play major roles in shaping the character of the environment and help stimulate leisure and tourism whilst improving residents and visitors quality of life.”</p> <p>However, the draft Local Plan at paragraph 7.2.3 indicates that the Green Wedge Review was undertaken due to the need to accommodate additional growth. It explains that the entire proposed growth area at Stoughton Grange is within land which has historically been identified as part of a Green Wedge.</p> <p>Objection is raised on the grounds that it is not</p>	<p>Stoughton Green Wedge was assessed at an overall ‘macro’ scale, however to ensure a good level of detail the Oadby, Thurnby, Stoughton Green Wedge was split down into two sub areas to aid the review process.</p> <p>One of the Green Wedge Review’s recommendations for the Oadby, Thurnby, Stoughton Green Wedge was to remove the land area identified as a Broad Location for Growth / Greenfield Release Site option, should the Council be required to allocate the land for development within the Council’s new Local Plan. Although, the land area illustrated within Figure 15 (of the Green Wedge Review document) currently forms part of the green wedge area situated within the Borough boundary, the removal of the land area would not have a significant detrimental impact on the attributes of the overall green wedge designation. Due to the current, overall large size of the Oadby, Thurnby, Stoughton Green Wedge and the current distance between the urban areas of Leicester City, Harborough District and the settlement of Oadby, removal of the land area would not allow for settlement coalescence.</p> <p>Due to the identified needs of the Borough, in particular housing OAN, the Council considered it necessary to release the land area to form the Stoughton Grange Direction for Growth Area.</p> <p>In relation to the suitability of the land at Oadby Grange it is of note that the Council had not been made aware the recent interest in bringing the land forward, prior to the Local Plan Pre-Submission Consultation stage. It was only made aware through Pegasus Planning’s submission on the 18th December 2017 (the closing day for the Local Plan Pre-Submission Consultation). Therefore this land has not:</p>
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		<p>necessary or appropriate to release this land from the Green Wedge when better suited sites outside of the designated area are available. The proposed allocation would cause development to encroach into the Green Wedge and which will consolidate development in this area, reducing the separation of built up areas, further distancing residents of Leicester and other urban areas from the countryside and eroding the important "Green Lung" that the Green Wedge Review refers to at p.37. This runs counter to the objectives of the Green Wedge designation.</p> <p>Given the harm to the Green Wedge, the LPA should have considered all options outside of the designated area before allocating this site. The Land at Oadby Grange offers the opportunity to provide a similar number of dwellings on a site outside the Green Wedge and it should therefore be considered sequentially preferable in this regard.</p> <p>The Sustainability Appraisal also highlights at paragraph 4.66 that development at Stoughton Grange would be provided in a location "with poorer levels of access to existing facilities." The site proforma in the appendices to the SA also notes that the site is not within walking distance of any primary schools, secondary schools or colleges (OWBC24). The Site Deliverability Statement that has been prepared for Oadby Grange does not identify any such constraints for that site meaning that it is also sequentially preferable in accessibility terms.</p> <p>Heritage is also a potential constraint for Land at Stoughton Grange with development having the potential to affect the settings of designated heritage assets (see Local Plan para 7.2.5). No such constraints affect Oadby Grange and as such these potential impacts can be avoided.</p>	<ul style="list-style-type: none"> • Been assessed by the Council through the Strategic Housing Land Availability Assessment since 2013, or • Been submitted to the Council for consideration during any of the Call for Sites processes that have been undertaken by the Council for the purposes of Local Plan preparation. <p>Furthermore, this land has been subject to a Section 106 Agreement between Mr Thomas Watson Walker, the Borough Council and Leicestershire County Council. The original S106 Agreement dates back to 2001. Throughout the time of the agreement, the Council has been in discussions with the land owner to provide a publically owned country park, hence the land area ceasing to be considered by the Council for built development post 2013 (alongside a lack of developer or site promoter interest).</p> <p>The land has previously been included in the Council's SHLAA process due to it being considered through the Council's Allocations Issues and Options Public Consultation 2007. It has not been promoted by an external land agent or land owner.</p> <p>In addition, the Oadby Grange site, is situated in designated Countryside and does not have direct access onto one of the Borough's main highway and transport routes (A Road or B Road). The site is located to the very edge of an existing residential estate, approximately 0.7 miles from the nearest main route, the A6. It should also be noted that the site did not form part of the South East Leicestershire Transport Study, therefore has not been taken account of from a cumulative transport / highway testing perspective.</p>
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		<p>Summary of representation (if it is more than 100 words in length):</p> <p>The Pre Submission Plan and the supporting Sustainability Appraisal has not considered the option of allocating Land at Oadby Grange for housing and has therefore not demonstrated that the proposals in the plan are the most appropriate given the reasonable alternatives.</p> <p>The Stoughton Grange allocation gives rise to adverse impacts which do not arise with the Land at Oadby Grange.</p> <p>Changes:</p> <p>Land at Oadby Grange should be identified as an additional residential allocation to address the increased housing requirement that is likely to arise from a more robust assessment of the OAN (see objections to Policy S2) and the need to provide for contingency and choice.</p> <p>If those objections are not accepted, the site should still be allocated for housing as an alternative to land at Stoughton Grange (Policy 18) because it represents a more sustainable option.</p>	<p>It is important to note, that the Council, throughout the preparation of the Local Plan, has considered sites that have been promoted to the Council through the numerous Local Plan Call for Sites processes undertaken and the SHLAA Call for Sites process undertaken. The Council has considered sites that have known developer interest and have been informed regarding a sites availability, achievability and suitability.</p> <p>To reiterate, the Council has not been made aware of the site being promoted by Pegasus Planning during the Local Plan process, until the Pre-Submission Local Plan Consultation final day for representations, therefore the Council considers that it is inappropriate to say that the Council has not considered the site, in particular through the Sustainability Appraisal process, as the Council was unaware of it.</p> <p>The reasons why the Land at Oadby Grange has not been appraised as a reasonable alternative in the SA Report have been set out above. The previous sections have also demonstrated how the Council has made use of the SA findings to inform the selection of site options and policy options for inclusion in the Local Plan.</p>
18.12.17	Pegasus Group (Oadby Grange)	<p>Support/Object: Object</p> <p>Consultation Point: Policy 21 – Cottage Farm Direction for Growth Area</p> <p>Representation:</p> <p>As set out in other representations on behalf of Mrs B A Walker in relation to Policy 2, the objector’s primary</p>	<p>Comment noted.</p> <p>In relation to the suitability of the land at Oadby Grange it is of note that the Council had not been made aware the recent interest in bringing the land forward, prior to the Local Plan Pre-Submission Consultation stage. It was only made aware through Pegasus Planning’s submission on the 18th December 2017 (the closing day for the Local Plan Pre-Submission</p>

		<p>position is that the OAN is not robust and that the housing requirement should be increased for this and other reasons. This will mean that additional sites will need to be allocated for housing and the objector considers that this should include Land at Oadby Grange.</p> <p>Even if those objections are not accepted, it is considered that the site is still more suitable than some of the allocated sites including the Land at Cottage Farm Direction for Growth Area (Policy 21). As explained in the more general objections in relation to Chapter 7, the Sustainability Appraisal (SA) has not demonstrated that the proposals in the plan are the most appropriate given the reasonable alternatives, as the LPA has failed to consider Land at Oadby Grange as an option for residential development.</p> <p>Land at Oadby Grange</p> <p>The merits of the Land at Oadby Grange are set out in separate representations and the attached Site Deliverability Statement and are not repeated again here to avoid duplication.</p> <p>Land at Cottage Farm</p> <p>The Land at Cottage Farm is allocated for a further 250 dwellings (phase 2) through Policy 21, in addition to the 150 dwellings that have already been granted (phase 1).</p> <p>Whilst the draft allocation site located just beyond the defined Green Wedge in this area, the site still comprises open land which separates Oadby and Wigston. The Green Wedge Review (2017) highlights concerns about the southern end of the wedge noting that this is important as it "reduces the likelihood of</p>	<p>Consultation). Therefore this land has not:</p> <ul style="list-style-type: none"> • Been assessed by the Council through the Strategic Housing Land Availability Assessment since 2013, or • Been submitted to the Council for consideration during any of the Call for Sites processes that have been undertaken by the Council for the purposes of Local Plan preparation. <p>Furthermore, this land has been subject to a Section 106 Agreement between Mr Thomas Watson Walker, the Borough Council and Leicestershire County Council. The original S106 Agreement dates back to 2001. Throughout the time of the agreement, the Council has been in discussions with the land owner to provide a publically owned country park, hence the land area ceasing to be considered by the Council for built development post 2013 (alongside a lack of developer or site promoter interest).</p> <p>The land has previously been included in the Council's SHLAA process due to it being considered through the Council's Allocations Issues and Options Public Consultation 2007. It has not been promoted by an external land agent or land owner.</p> <p>In addition, the Oadby Grange site, is situated in designated Countryside and does not have direct access onto one of the Borough's main highway and transport routes (A Road or B Road). The site is located to the very edge of an existing residential estate, approximately 0.7 miles from the nearest main route, the A6. It should also be noted that the site did not form part of the South East Leicestershire Transport Study, therefore has not been taken account of from a</p>
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		<p>“wrap” round development that would essentially join the two settlements.”[page 25].</p> <p>It is notable that the LPA even proposes to extend the Green Wedge designation immediately to the west of the proposed allocation, no doubt recognizing that development in this location will reduce the degree of separation that the plan seeks to maintain (in combination with the Wigston Area for Growth – Policy 20). Whilst it should be repeated that the site is not part of the designated area it will still to some degree diminish an important green lung between the urban areas and connection to the wider countryside as described in the Green Wedge Review at page 25 (2017).</p> <p>Regardless of the impact of the degree of separation for the two main towns, development in this location would represent a new incursion into open land, which would be poorly related to the pattern of built development in the area contrary to the emerging Policy 44 (Landscape and Character). It would read as an outlier which is surrounded by open land on three of its four sides. The Sustainability Appraisal proforma for this site (OWBC44 at Appendix page 356) considers the need to protect and enhance the character and quality of the landscape and states that “development of residential properties at this location has the potential to negatively impact upon the landscape and a significant negative effect is expected on this SA objective.”</p> <p>The Land at Oadby Grange would by comparison be a far more sympathetic and logical rounding off for the built-up area and the initial Landscape and Visual Analysis set out in the Site Deliverability Statement which is submitted alongside these representations</p>	<p>cumulative transport / highway testing perspective.</p> <p>It is important to note, that the Council, throughout the preparation of the Local Plan, has considered sites that have been promoted to the Council through the numerous Local Plan Call for Sites processes undertaken and the SHLAA Call for Sites process undertaken. The Council has considered sites that have known developer interest and have been informed regarding a sites availability, achievability and suitability.</p> <p>To reiterate, the Council has not been made aware of the site being promoted by Pegasus Planning during the Local Plan process, until the Pre-Submission Local Plan Consultation final day for representations, therefore the Council considers that it is inappropriate to say that the Council has not considered the site, in particular through the Sustainability Appraisal process, as the Council was unaware of it.</p> <p>Comments relating to the appropriateness of the Cottage Farm Direction for Growth are set out in the Local Plan Spatial Strategy Submission document that the Council has produced for Local Plan Submission.</p> <p>The findings of the SA Report in relation to the Land at Cottage Farm which the objector has highlighted are not in question. The SA appraisal of site OWBC44 has recognised that the associated uses which will be provided alongside the residential development at this location may include open space meaning a minor positive effect is also expected on SA objective 9 (landscape) in combination with the significant negative also identified effect due to incursion into the countryside and loss of greenfield land.</p>
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		<p>indicates that the site is capable of accommodating development without causing significant harm to the landscape or visual amenities of the area.</p> <p>Summary of representation (if it is more than 100 words in length): The Pre Submission Plan and the supporting Sustainability Appraisal has not considered the option of allocating Land at Oadby Grange for housing and has therefore not demonstrated that the proposals in the plan are the most appropriate given the reasonable alternatives.</p> <p>The objector has provided a Site Deliverability Statement which identifies the merits of the site and how it could be developed. This which should be read alongside these objections.</p> <p>Changes:</p> <p>Land at Oadby Grange should be identified as an additional residential allocation to address the increased housing requirement that is likely to arise from a more robust assessment of the OAN (see objections to Policy S2) and the need to provide for contingency and choice.</p> <p>If those objections are not accepted, the site should still be allocated for housing as an alternative to the Land at Cottage Farm Direction for Growth Area (Policy 21).</p>	<p>The findings of the SA Report for Policy 21 should also be considered in relation to any development at the site given that this text would guide the development. The SA of this policy in Appendix 9 highlights that the Council proposes to extend the Green Wedge to bound the south west of the growth area to ensure that there is no future coalescence of the settlements of Wigston and Oadby. This proposal would help to mitigate effects of coalescence and associated adverse impacts on the landscape, for example, it requires that development within the Direction for Growth area would not have “detrimental impact on the surrounding Green Wedge and Countryside”.</p> <p>The reasons for not including the Land at Oadby Grange as a reasonable alternative for appraisal within the SA Report have been explained above. It has also been noted that the SA Report forms part of the decision making process for the consideration of options for policies and sites to take forward in the Local Plan.</p>
18.12.17	Pegasus (Wheatcroft Properties)	<p>Spatial Objective 14</p> <p>Spatial objective 14 advises that the settlement of Kilby Bridge would benefit from small scale development, consisting of residential, commercial and tourism. This spatial objective is supported.</p>	<p>Comment of support noted.</p>

18.12.17	Pegasus (Wheatcroft Properties)	<p>Policy 17 Kilby Bridge Settlement Envelope</p> <p>Policy 17 proposes that the Council will consider small scale development proposals within the defined Settlement Envelope of Kilby Bridge. The policy advises that any residential development proposals should be small scale and identifies the potential for up to 40 dwellings to be delivered across the whole settlement. The proposed definition of a settlement envelope for Kilby Bridge and the support for small scale residential development is supported. Kilby Bridge is as sustainable location for some further limited growth, and as the Submission Draft Plan indicates, allowing some limited development would assist with the regeneration of the settlement, supporting the development of vacant and underused land.</p> <p>The definition of a settlement envelope for Kilby Bridge is consistent with guidance set out in the NPPF which encourages local planning authorities to plan for the needs of the more sustainable rural settlements (paras 54 and 55).</p> <p>Wheatcroft Properties Limited own land to the west of Welford Road. The site consists of a vacant residential property, Ingleneuk, in some 0.11 hectares of land with the potential for redevelopment for around 3 dwellings. Redevelopment of the site would assist with the regeneration of the settlement.</p>	Comment of support noted.
18.12.17	Pegasus (Wigston Direction for Growth area)	<p>These representations are made on behalf of David Wilson Homes East Midlands who have interests in the proposed Wigston Direction for Growth. David Wilson Homes worked closely with the Borough Council on the adopted Core Strategy and the promotion of Phase 1 of the Wigston Direction for Growth. This first phase of the Direction for Growth is due to start onsite imminently following approval of the</p>	Comment of support noted.

		<p>first reserved matters application.</p> <p>The following comments are made in relation to the Submission Draft Plan proposals to identify the Wigston Direction for Growth as one of three key strategy sites to deliver the Borough's housing requirements over the plan period and the identification of Phase 3 as a buffer to provide flexibility in the Council's housing land supply to deal with changing circumstances.</p> <p><u>Spatial Objectives, Paragraph 3.2.1</u></p> <p>The Spatial Objectives for the plan include Spatial Objective 2, Wigston Town Centre, which aims to reinforce Wigston's role as the Borough's main town and one of only a small number of town centres in the Leicester PUA, and Spatial Objective 7 aiming to establish a number of directions for growth adjacent to the Leicester PUA, located to reinforce Wigston's main town centre role.</p> <p>These Spatial Objectives are supported and reflect and carry forward the key spatial objectives set out in the adopted Core Strategy. At the examination into the Core Strategy, the Inspector fully endorsed this key spatial strategy. The provision for the expansion of the Wigston Direction for Growth through additional phases of development will play an important role in supporting the Council's strategy to reinforce Wigston's role as a Main Town. The Wigston Direction for Growth is well located in relation to Wigston Centre and future residents will enjoy easy access to the centre by sustainable modes.</p>	
18.12.17	Pegasus (Wigston Direction for Growth area)	<p><u>Housing Growth, Paragraph 4.2.11</u></p> <p>Paragraph 4.2.11 indicates that in addition to the various components of housing supply set out in Table</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>Upon the publication of the HEDNA in January 2017,</p>

		<p>1 to the Submission Draft Plan, there is an additional number of new homes that could be delivered up to the end of the Plan period 2031 and beyond. Reference is made to Phase 3 of the Wigston Direction for Growth with the scope to provide approximately 300 additional homes. The Draft Plan explains that the identified additional new homes figure of approximately 400 homes in total allows the Council a 'buffer' against the Plan period target of 2,960 homes to address any delivery issues on allocated sites and help to fulfil a small proportion of Leicester City's declared unmet need.</p> <p>The identification of a buffer including Phase 3 of the Wigston Direction for Growth is supported. This approach is advice to Government from the Local Plans Expert Group who recommend that local planning authorities include in their local plans a mechanism to provide for reserve sites equivalent to 20% of their housing requirement. The DCLG, in a presentation to the HBF Planning Conference in 2015 identified the need for a 10-20% non-implementation allowance and a 15-20% lapse rate.</p> <p>The Council's suggested buffer of some 400 dwellings would provide a 13.5% buffer against the overall housing requirement. To provide a 20% buffer would require an additional reserve provision of around 590 dwellings.</p> <p>As drafted, the Council's approach to the identification of a proposed buffer is not expressed in a specific local plan policy. In addition, whilst specific locations are identified, such as Phase 3 of the Wigston Direction for Growth, these reserve sites are not identified on the Submission Draft Plan Proposals Map.</p>	<p>the Council has had to work extremely proactively and positively to meet its illustrated housing OAN. The housing OAN illustrated within the HEDNA (and subsequent Plan target) is a huge 'step change' for the Council. From planning for 90 dwellings per year, the Council has had to plan for 148 dwellings per year to fulfil its own OAN.</p> <p>The huge change / shift in housing requirement has meant that the Council has had to identify and allocate over 60 per cent more land than it would have been required to identify should the requirement have remained at 90 dwellings per year. The Council however, has managed to identify such required land.</p> <p>The South East Leicestershire Transport Study assessed the highway and transport network within the Borough up to 2031 taking account of the land identified and allocated within the Local Plan. The assessment concluded that the levels of development proposed could be accommodated, however highway mitigation works would be required. Any development over and above that proposed within the Plan is likely to have significant further impacts on the local highway network.</p> <p>The 'buffer' identified within the Plan of approximately 400 new homes would be subject to appropriate testing, in particular highway and transport infrastructure capacity.</p> <p>The Council notes the representation that states that 'Phase 3' of the Wigston Direction for Growth has capacity for a further 200 new additional homes, therefore increasing the potential capacity from 300 to 500.</p>
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18.12.17	Pegasus (Wigston Direction for Growth area)	<p><u>Policy 2, Spatial Strategy</u></p> <p>Policy 2 sets out the proposed spatial strategy to provide for at least 2,960 new homes over the plan period, with the three Direction for Growth areas providing for at least 1,159 additional homes and 5 hectares of employment land. The spatial strategy is supported. The Direction for Growth is a key component of the proposed strategy. Through its work on Phase 1 of the Wigston Direction for Growth, David Wilson Homes has demonstrated that the Direction for</p>	Comment of support noted.

		Growth is a sustainable and deliverable development opportunity. With the double outlets of Barratts and David Wilsons, the Direction for Growth can deliver the rates of development envisaged in the Draft Plan.	
18.12.17	Pegasus (Wigston Direction for Growth area)	<p><u>Policy 20 Wigston Direction for Growth</u></p> <p>Policy 20 of the Submission Draft Plan sets out the Council's proposals to allocate further land at the Wigston Direction for Growth area for Phase 2 development. The Phase 2 allocation provides for at least 600 homes and some 2.5 hectares of employment land.</p> <p>The policy sets out the range of supporting infrastructure that would be required as part of the development. The overall requirements as set out in the policy are supported. David Wilson Homes has prepared an initial Indicative Masterplan showing how the approved Phase 1 of the Wigston Direction for Growth can be expanded to provide for a Phase 2 development of some additional 600 homes. The plan also identifies the broad location for a third phase of development with the scope to provide for an additional 500 dwellings on land within David Wilson Homes' control if required.</p> <p>Paragraph 7.4.10 of the Submission Draft Plan notes that the Council is aware that a cumulative approach to the development of the Direction for Growth could require amendments to the existing Section 106 agreement relating to Phase 1. The Council's commitment to work collaboratively with the land owner to amend the Section 106 agreement as deemed necessary is welcomed.</p> <p>Separate comments are made in relation to the requirements to provide for self-build/custom build</p>	Comment of support noted.

		units as part of the proposed development.	
18.12.17	Pegasus (Wigston Direction for Growth area)	<p>Policy 14 encourages the provision of self-build and custom build on all large scale residential developments. The policy indicates that the Council will also consider proposals for self-build/custom build on smaller sites in the urban area. Policy 20 on the Direction for Growth at Wigston specifically requires the provision of self-build/custom build on the site. There is insufficient evidence of the scale of interest in self-build and custom build in the borough. In addition, it is likely that those interested in self-build projects will not wish to build a unit on a large scale housing site. Provision for self-build units on larger sites will also create practical difficulties for housebuilders in managing the development of sites.</p> <p>The HBF has commented on other local plans indicating that, whilst it is supportive of self-build for its additionality to housing supply, it is not supportive of a housing mix approach where a requirement to provide self-build plots is imposed on sites of a certain size. This approach merely changes the house building delivery mechanism from one form of house building company to another without any consequential additional contribution to boosting housing supply. If self-build plots reserved on larger sites are not developed, the Council has effectively caused unnecessary delay in housing delivery. The HBF also highlight the practical difficulties, including health and safety implications, working hours, length of build programme, of implementing a housing mix policy approach.</p> <p>As the HBF has highlighted in other responses to local plans, a number of Local Plan Inspectors have commented on the issues associated with self-build on larger sites. The East Devon Local Plan Inspector</p>	<p>Comment noted.</p> <p>To ensure that the Council is acting positively and proactively it does not consider it appropriate to remove the reference to '<i>on all large scale residential development</i>' in Local Plan Policy 14 Self Build and Custom Build. It should be noted that Local Plan Policy 14 Self Build and Custom Build does not <u>require</u> the provision of custom and / or self build, it seeks to <u>encourage</u> provision of plots.</p> <p>In addition, to ensure consistency with Local Plan Policy 14, the Council would not be opposed to a rewording of the relevant policy bullet points (in Local Plan Policy 18, 20 and 21) in relation to provision of Self Build and Custom Build, that sought an 'encouragement' for provision, rather than a 'requirement' for provision.</p>

		<p>expressed reservations about the implementation difficulties associated with this sort of policy, commenting as follows:</p> <p><i>'However, I don't see how the planning system can make developers sell land to potential rivals (and at a reasonable price). East Devon Inspector's Report, January 2016 para 46</i></p> <p>The Cornwall Inspector commented on this issue as follows:</p> <p><i>'The Council's published change on this policy was too prescriptive in requiring larger developments to provide at least 5% of development as serviced plots for self-build/custom build. There is not yet the evidence to justify this level of prescription and there must be considerable uncertainty as to whether plots on large new housing estates would be attractive to self-build/custom builders.'</i></p> <p><i>Cornwall Inspector's Report Para 168</i></p> <p>A further point is that any proposed policy requiring self-build/custom build on larger sites should be viability tested in accordance with the NPPG which confirms that different types of residential development such as those wanting to build their own homes are funded and delivered in different ways and this should be reflected in viability assessments (ID 10-009-20140306).</p> <p>Policies 14 and 20 should be amended to remove references to the provision of self-build/custom build on the proposed Directions for Growth sites.</p>	
18.12.17	The Planning Bureau Limited (Mccarthy & Stone)	Thank you for the opportunity to comment on the consultation papers for the aforementioned document. As the market leader in the provision of sheltered housing for sale to the elderly, McCarthy and Stone Retirement Lifestyles Ltd considers that with its	Comment of support noted.

		<p>extensive experience in providing development of this nature it is well placed to provide informed comments on the emerging Oadby & Wigston Borough Council Local Plan – Pre-submission consultation, insofar as it affects or relates to housing for the elderly.</p> <p>The National Planning Policy Framework stipulates that the planning system should be '<i>supporting strong, vibrant and healthy communities</i>' and highlights the need to '<i>deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive mixed communities. Local Planning Authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community... such as... older people</i>' (emphasis added).</p> <p>The recently published National Planning Practice Guidance reaffirms this in the guidance for assessing housing need in the plan making process entitled "How should the needs for all types of housing be addressed?" (Paragraph: 021 Reference ID: 2a-021-20140306) and a separate subsection is provided for "Housing for older people". This reads stipulates that "<i>the need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013). Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to move. This could free up houses that are under-occupied. The age profile of the population can be drawn from Census data. Projections of population and households by age group should also be used. The future need for older persons housing broken down by tenure and type (e.g.</i></p>	
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		<p><i>Sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (use class C2). But identifying the need for particular types of general housing, such as bungalows, is equally important.”(My emphasis).</i></p> <p>We wrote to the Council in November 2016 as part of the issues and options and we were then keen to stress the need to consider addressing the current and future housing needs of older people within Oadby & Wigston and for your Local Plan to acknowledge the role that owner-occupied sheltered housing schemes play in meeting older person housing needs, and in providing housing choice for the wider community by freeing up valuable, under- occupied family homes in the local area.</p> <p>We commend the Council for acknowledging the need to provide specialist older person accommodation in the Borough to meet the diverse housing needs of its older residents in the pre-submission version of the plan and consider this approach to be both sound and appropriate.</p> <p>I trust that the above comments will be taken into account and considered as part of the examination and evolution of the Local Plan. We would be particularly keen to become involved with any consultation or workshops on emerging policy or strategy work in the field of the housing needs of the ageing population.</p>	
18.12.17	SSA Planning	Thank you for the opportunity to respond to your pre-submission draft of the above. We responded at the Preferred Options stage to draft Policy 5.2 'Improving Health and Wellbeing', which appeared to link the location of hot food takeaways with deprivation and	Comment of support noted.

		<p>poor health, but did not evidence whether or how they were linked. The policy would therefore have left applicants unclear as to how the impact of development would be assessed.</p> <p>Consequently, we support the amended draft Policy 5, which, together with draft Policy 36, properly retains protections on retail health. By protecting retail health, walkable access to services, facilities and jobs are supported, which in turn are likely to lead to better health outcomes in the populations served by the centres or areas affected. We consider this effect far greater than any significant link between clustering or proximity and ill-health.</p> <p>In summary, we consider that the policies as now drafted are sound, as they plan positively for the facilities needed, rely on the retail evidence base for justification, will be effective in maintaining retail balance and consistent with national policy. We therefore support them</p>	
18.12.17	Turley Planning	<p>Policy 2 – Spatial Strategy for Development within the Borough</p> <p>Policy 2 states that in order to achieve the required levels of growth to meet the Borough’s needs up to 2031, the Local Plan will:</p> <ul style="list-style-type: none"> • allocate sufficient land to provide at least 2,960 new additional homes; • allocate sufficient land to provide at least 8 hectares of employment use development; and • identify sufficient land to provide up to 2,974 sq m of new additional retail floorspace. <p>To achieve this growth, the plan identifies and allocates land within Wigston town centre, Oadby district centre, South Wigston district centre, the Borough’s</p>	<p>Comment noted.</p> <p>Response set out in further responses to Turley Planning.</p>

		<p>designated local centres, areas within the Leicester PUA and the three Direction for Growth Areas. Our client considers that Policy 2 of the Pre-Submission Plan fails to plan for the levels of growth actually required over the plan period, particularly in respect of housing and the provision of new retail floorspace. In doing so, the Pre-Submission Plan therefore fails to allocate sufficient land to meet the Borough's actual need over the plan period.</p> <p>In terms of residential development, Paragraph 4.2.4 confirms that the Council considers its Objectively Assessed Need (OAN) for housing to be 2,960 for the period to 2031. This figure is taken from the Housing & Economic Development Needs Assessment (HEDNA) (January 2017).</p> <p>The HEDNA confirms that the OAN figures presented "do not represent plan targets", instead they "represent the starting point for considering housing provision within local plans" (Paragraph 12.42). This is recognised in the Pre-Submission Plan, which also states the OAN should be the starting point for the Council's target over the plan period (Paragraph 4.2.4). Paragraph 4.2.6 and Policy 2 confirm that the spatial strategy set out in the Pre-Submission Plan only seeks to deliver 2,960 new homes across the plan period.</p> <p>Whilst this figure is in line with the claimed OAN, our client is concerned that the level of new homes planned for is not sufficient.</p> <p>As recognised by the Council, the OAN should be seen as a starting point only when determining the appropriate housing requirement. Other factors must also be taken into account, which should include the need to meet unmet need in Leicester City.</p>	
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		<p>'additional', it is noted that the 2,960 requirement is set out as a minimum 'at least' figure. Any homes above this figure are therefore not additional. The Pre-Submission Plan also recognises the importance of delivering above the OAN figure given the nature of strategic sites (e.g. the associated lead in times and upfront infrastructure requirements). It is therefore considered unlikely that the level of housing planned for in the Pre-Submission Plan will provide any meaningful contribution to the identified unmet need of Leicester City.</p> <p>Turning to new retail provision, Policy 2 states that the Local Plan will identify sufficient land to provide up to 2,974 sq m of new additional retail floor space. This provision is broken down to 1,169 sq m at Wigston Town Centre, 1,351 sq m at Oadby District Centre and 454 sq m at other areas within the Leicester PUA. The policy provides no further breakdown as to what whether this floorspace provision relates to convenience or comparison goods.</p> <p>Our client is strongly of the view that the retail provision planned for through Policy 2 is insufficient to meet the actual qualitative and quantitative convenience need over the plan period. The full reasoning behind this position is returned to below in Policy 22, which deals specifically with 'delivering retail'. In light of the above (and the points made below in relation to Policy 22), the Pre-Submission Plan is not considered 'sound' given that:</p> <ul style="list-style-type: none"> • It is not positively prepared – given that the spatial strategy set out in Policy 2 fails to meet the full development requirements of the Borough, together with unmet requirements from neighbouring authorities (Leicester City); 	
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		<ul style="list-style-type: none"> • It is not justified – given that Policy 2 does not represent the most appropriate strategy, on the basis that it fails to provide for sufficient levels of residential and retail growth in particular; • It is not effective – given that it does not adequately reflect cross-boundary strategic priorities. 	
18.12.17	Turley Planning	<p>Policy 22 – Delivering Retail</p> <p>Policy 22 sets out the additional overall retail capacities (net) that will be sought within a number of identified centres over the plan period, namely:</p> <ul style="list-style-type: none"> • Wigston, 1,169 sq m; • Oadby, 1,351 sq m; • South Wigston, 373 sq m; and • Local Centres, 81 sq m. <p>As with Policy 2, no clarification is provided within the policy itself as to whether the figures provided relate to comparison or convenience floorspace, or the breakdown between the two. Taking Oadby specifically, it is apparent from the supporting text that the additional retail capacity identified in Policy 22 is comparison only.</p> <p>Paragraph 8.2.16 of the Pre-Submission Plan states that the Retail Capacity Study (November 2016) identifies “zero quantitative capacity for convenience retail floorspace in Oadby in the short, medium or long term, up to 2031”. It continues by stating that, “due to this, there is no demonstrable requirement to proactively plan for new convenience floorspace in Oadby district centre up to the end of the plan period.”</p> <p>In contrast, it continues by stating that the capacity for</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>As the representation suggests, Local Plan Policy 22 sets out the additional overall retail capacities in net floorspace up to 2031 for each of the Borough’s main centres. The Policy wording itself does not set out the breakdown between convenience and comparison retail floorspace, the splits are clearly set out within the three tables of the policy supporting text.</p> <p>Local Plan Policy 22 Delivering Retail and its supporting text is evidenced by the Council’s Retail Capacity Study 2016 undertaken taken by Lichfields (then Nathaniel Lichfield & Partners). The retail capacity study assesses each of the Borough’s three main centres of Wigston, Oadby and South Wigston in detail, and specifies (with robust justification) their individual retail (both convenience and comparison) capacities up to 2031. The retail capacity study assessed both quantitative and qualitative need for retail floorspace within the Borough, and indeed the comment received acknowledges that the study concludes that <i>Oadby district centre is well provided for on a qualitative basis</i>. It is important to bear in mind that the NPPF does not include any specific reference to the ‘discount’ sector or for that matter any specific sector. Whilst Paragraph 23 of the NPPF refers to allocated sites for the ‘...scale and type of retail’ needed, type is referring to convenience</p>

		<p>additional comparison floorspace over the plan period is 1,351 sq m (net) – the total figure for new retail floorspace set out in Policy 22.</p> <p>As stated in relation to Policy 2, our client strongly disagrees with the failure to identify any additional convenience retail floorspace in Oadby. Our client considers there to be a qualitative need for additional convenience floorspace over the plan period, specifically in the form of a new deep discounter foodstore(s). This position is supported by the Council's own evidence base relating to retail.</p> <p>The evidence base relating to the retail policies set out in the Pre-Submission Plan is contained in the Oadby and Wigston Retail Capacity Study (November 2016).</p> <p>Despite the title of the Study, it purports to address the need for new retail floorspace over the plan period in the Borough in both quantitative and qualitative terms. On closer inspection, the Study is almost exclusively concerned with quantitative capacity for new retail floorspace, with scant regard for qualitative factors. Paragraph 161 of the NPPF confirms that the evidence base should assess "the needs for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including for retail and leisure development" (our emphasis).</p> <p>Paragraph 3.28 of the Retail Capacity Study notes that "the expansion of discount food operators continues and at rapid pace, building upon sustained growth in the last decade". It continues by noting that "it is surprising that Oadby and Wigston Borough contains just one deep discount foodstore, an Aldi on Bull Head Street in Wigston, which is on the small side of Aldi's</p>	<p>and/or comparison retail floorspace. This stands to reason when it is considered in the context that most of the leading convenience retailers carry a multiplicity of lines, including premium and value/budget lines. There is nothing in the NPPF that requires a local planning authority to plan for the needs of individual commercial businesses/commercial businesses models. The 2016 Retail Capacity Study is clear that there is no quantitative need for additional convenience retail floorspace in Oadby over the plan period, and that the centre is well provided for on a qualitative basis. The 2016 Retail Capacity Study provides a robust retail evidence base that has enabled Council officers to produce town centre and retail planning policies which meet the requirements of Paragraph 23 of the NPPF.</p> <p>Paragraph 3.28 of the Retail Capacity Study does state that <i>'the expansion of discount food operators continues and at rapid pace, building upon sustained growth in the last decade, albeit the recent experimental reintroduction of the Netto facia has ended with the pilot stores closing. It is surprising that Oadby and Wigston Borough contains just one deep discount foodstore, an Aldi on Bull Head Street in Wigston, which is on the small side of Aldi's current format; there are no Lidl stores within the Borough. There is however, a Farmfoods store and an Iceland store present both of which are on Bell Street in Wigston. In the short to medium term, any new foodstore proposals in Oadby and Wigston Borough are likely to be driven by discount operators such as Aldi and Lidl. As of June 2016, Aldi and Lidl saw sales increase by 11.5% and 13.8% respectively, taking their combined market share of the UK to a new high of 10.5%, based on the twelve weeks to 19 June 2016'.</i></p> <p>The paragraph does however need to be viewed in the</p>
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		<p>current format; there are no Lidl stores within the Borough." The Study therefore concludes that "in the short to medium term, any new foodstore proposals in Oadby and Wigston Borough are likely to be driven by discount operators such as Aldi and Lidl".</p> <p>Turning specifically to Oadby, the Retail Capacity Study states that, in terms of convenience floorspace, Oadby district centre is well provided for on a qualitative basis. The paragraph, however, continues by acknowledging that "Oadby is lacking a deep discount foodstores, such as Aldi and Lidl, which would be an attractor for the large student population and it is likely that any new foodstore operator coming forward in Oadby would be a deep discount foodstore operator" (Paragraph 3.107).</p> <p>Despite this evidence, the Retail Capacity Study states that there is no need for additional convenience goods floorspace in Oadby (Paragraph 3.122). Indeed, the only additional convenience floorspace identified over the plan period is 637 sq m (net) sales floorspace capacity in Wigston town centre and 38 sq m (net) within the local centres. The Retail Capacity Study states that one reason for this is because the majority of foodstores in the Borough are trading at below expected levels, when comparing the 2016 household survey results with the benchmark turnover of these stores (Paragraph 3.123). Whilst in general terms the Study claims that there is a good range of convenience retail stores available to residents of the study area, at Paragraph 3.123 it is recognised that there is "a more limited range of deep discounters in the Borough than in other neighbouring areas".</p> <p>Our client considers that the evidence base and current market conditions demonstrate that there is a clear and unmet qualitative need for additional convenience</p>	<p>context of the report. The paragraph sits in the chapter of the report that is looking at retail trends, specifically, 'Retail Operators Changing Formats', it is not a paragraph stating outcomes or conclusions to retail capacity assessments. It should also be noted that paragraph 3.28 suggests that '<i>...any new foodstore proposals in Oadby and Wigston Borough are likely to be driven by discount operators</i>', it does not state that there is a required need for them in the Borough. The statement is based on national trends and the expansion of discount food stores generally, and of course the absence of assessed quantitative and qualitative need in a development plan does not preclude applications for convenience retail floorspace coming forward. In a town centre location there would be no retail policy reason to resist such a proposal. Outside of a defined town centre, it is incumbent on an applicant to address the sequential approach and impact tests as part of an overall consideration of compliance with the development plan having regard to other material consideration. Lichfields is merely making the point that growth in the discount fascia sector nationally and an absence of such fascias in Oadby and Wigston points to a likelihood of further proposals for stores within this sector coming forward. The local planning authority would respond to any such proposals accordingly having regard to the development plan and material considerations.</p> <p>The settlement of Oadby has a wealth of larger convenience retail stores, including an ASDA, a Waitrose, a Sainsbury's and a Marks and Spencers Food Store. The District centre of Oadby also has a number of smaller scale convenience food retail stores. In addition there are a number of local centres within Oadby that are 'home' to smaller scale convenience retail stores. It is not the cases that for a town centre</p>
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		<p>floorspace over the plan period, specifically a requirement for increased market provision by deep discounters, particularly to serve Oadby.</p> <p>Paragraph 2.3.16 of the Pre-Submission Plan recognises that “there is tendency with the residents of Wigston, Oadby and South Wigston, not to travel out of ‘their’ settlement to access other shops, services and facilities that are available within the Borough”. This desire to shop within ‘their’ settlement is currently undermined by the limited representation of deep discounters in the Borough, and particularly in Oadby.</p> <p>Aside from the Council’s own evidence base, the Mintel Food and Non-Food Discounters UK (September 2017) also helps to demonstrate the continued growth in the market share of, and the demand for, deep discounter provision.</p> <p>This is in part as a result of wage growth failing to keep pace with inflation. This means that for the first time since 2014, real incomes are now falling. Despite this retail sales, in both value and volume terms, remained positive in the first half of 2017, although it is forecast that it is a trend that will bite harder in the second half of the year. Mintel conclude that, if consumers become stretched they are likely to look to cut back on expenditure, particularly in discretionary areas, which is likely to be to the benefit of the value oriented discount sector.</p> <p>The Mintel report also refers to the growth in popularity of the two largest discounters (ALDI and Lidl) within the UK over the last decade. The report notes that discounter use is high amongst UK consumers, with 89% shopping with at least one discount retailer in the three months to July 2017. They are popular across all</p>	<p>to be healthy it needs to contain the full spectrum of convenience retail fascias. Applying that logic to the comparison retail sector illustrates that this is a comment without basis. Only regional centres contain a high proportion of national multiple comparison retail fascias, but that does not mean that lower order centres are necessarily in any way less healthy. The 2016 Retail Study is pointing out that any foodstore operator seeking a future presence in Oadby & Wigston Borough is most likely to be in the deep discount foodstore sector, having regard to the existing provision within Oadby and current national trends.</p> <p>The Study does not identify any need (quantitative or qualitative) for additional convenience retail floorspace within Oadby District Centre up to the period to 2031 and on this basis, it is not necessary for the Council to allocate sites within Oadby for new convenience goods destinations.</p> <p>Regarding the demand for ‘deep discount’ convenience retail within the Oadby area, the Council has not been made aware of any requirement recently but would treat any proposal coming forward on individual merit having regard to the development plan and material considerations.</p> <p>It should be noted that the Council, within the Local Plan, specifically through Policy 2 Spatial Strategy for Development in the Borough and Policy 22 Delivering Retail, has allocated/identified land sufficient to meet the retail needs of the Borough up to 2031. Further information and guidance relating to the Local Plan retail allocations is found within the Council’s Town Centres Area Action Plan document (Area Action Plan Guidance).</p>
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		<p>age groups, but particularly among the younger generation of shoppers.</p> <p>Mintel also note that the growth of the food discounters has continued to defy expectations - they are now the UK's fifth (Aldi) and seventh (Lidl) largest grocers and combined account for over 10% of grocery retail sales. Looking forward, Mintel note that there are ambitious pipelines of stores for both retailers which should ensure growth continues in the short term. The report states that both operators consider that there is plenty of growing room left in the UK, evidenced by the following figures:</p> <ul style="list-style-type: none"> • Lidl plans to invest a further £1.5 billion to add 60 new stores a year between 2017 and 2019; and • Aldi plans to add 300 by 2022. <p>Mintel therefore conclude that "clearly neither has plans to slow down and at present there seems to be no reason to do so." Indeed, despite murmurings of slower growth in early 2016, growth actually accelerated, and the more uncertain economic environment is only likely to benefit their position.</p> <p>The information set out above demonstrates the growth in popularity and demand for deep discounters at a national level, together with the continued plans for growth in representation in the short to medium term. This is consistent with the comments regarding this sector in the Retail Capacity Study.</p> <p>At a local level, Oadby meets the 'profile' of those areas targeted by deep discounters. As noted by Mintel, whilst popular across all age groups, deep discounters are particularly popular with younger generations. This is reflected by the Council's Retail Capacity Study,</p>	<p>The Council would like to reiterate that it has proactively sought retail development opportunities that are consistent with the sequential approach to main town centre uses, as set out within the NPPF at paragraphs 23 to 27.</p> <p>Retail, leisure and office development should be located within town and district centres, or at a smaller scale, local centres. The site being promoted by Turley is not situated within any of the recognised centres within the Borough, and is located within the Oadby and Wigston Green Wedge which crosses boundaries with Leicester City. The site also forms part of the Strategic Green Infrastructure corridor that runs from Leicester City in the north to the countryside of the Borough (and beyond in Harborough District). Any retail development proposed outside of defined town centres will be considered having regard to the development plan and material considerations including the tests of the sequential approach and impact.</p>
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		<p>which notes that a deep discounter in Oadby is likely to be an attractor for the large student population (given the proximity of the Oadby Student Village).</p> <p>It is therefore concluded that there is a clear and unmet qualitative need for deep discounter provision to serve Oadby. This is supported by the Council's own evidence base and national data sources. The Pre-Submission Plan, however, makes no provision for any additional convenience floorspace in Oadby across the plan period. Despite this, Paragraph 8.2.1 states that "identifying sufficient land to meet the retail needs of the Borough is positively achieved through this Plan".</p> <p>Our client strongly disagrees with this statement and contends that Policy 22 fails to provide for sufficient retail floorspace, specifically to meet the need for deep discounter provision. Having established that there is an unmet need for additional convenience floorspace in Oadby to accommodate a deep discounter(s), it follows that the Pre-Submission Plan should identify land to meet this requirement.</p> <p>It is recognised that the Pre-Submission Plan promotes a 'town and district centre first' approach for main town centre uses, with some flexibility for edge of centre locations. Whilst the Pre-Submission Plan does not specifically identify sites for additional retail floorspace in Oadby, the Draft Adopted Policies Map identifies two 'Town Centre Allocation Sites'. It is understood that these relate to two sites identified in the Town Centres Area Action Plan (September 2013), namely Brooksby Square and Baxter's Place. Neither site is, however, considered suitable to accommodate a deep discounter.</p> <p>Both sites are predominantly located behind the main retail frontage of the district centre, therefore lacking</p>	
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		<p>the prominence and visibility required by a modern convenience retailer. It is also noted that neither Baxter's Place or Brooksby Square are intended to accommodate the level of floorspace required by a modern deep discounter. Baxter's Place is intended to be a mixed retail, commercial and community scheme focused around a new central square. Neither the site itself nor the proposed mix of uses is considered suitable to accommodate a deep discounter foodstore. Likewise, Brooksby Square is intended to accommodate residential development and commercial development, together with a new public square fronted by a café/bar or kiosk. Neither the site, nor the intended use, is considered suitable to accommodate a deep discounter.</p> <p>Turning to the wider district centre, there are no suitable or available sites/premises that could accommodate a modern deep discounter. The Town Centres Area Action Plan recognises that Oadby district centre "suffers from a lack of modern units that are capable of satisfying modern retailer requirements". The boundary for Oadby district centre is also tightly drawn, adjoined by non-town centres uses along many of its boundaries. It is therefore difficult for retailers to identify sites/premises suitable to accommodate a modern convenience retailer within the district centre.</p> <p>This is evidenced by recent investment in convenience floorspace (Asda, Sainsbury's and Waitrose) being located outside of the district centre itself, along Leicester Road (the A6).</p> <p>In light of the above, our client considers that there is a short term need for the Council to identify land to accommodate a deep discounter within Oadby, and that no such site is available within the district centre itself, or in an edge of centre location. Land promoted</p>	
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		<p>by our client through the 'Call for Sites' process is considered suitable and available for such a use.</p> <p>The site extends to approximately 3.1 ha and is on two of the main arterial routes running through Oadby – being located to the north-west of Palmerston Way and south-west of Leicester Road. The location of the foodstore is to be fixed, but could be to the south west of Leicester Road close to the existing petrol filling station. The remainder of the site is within the ownership of our client and is considered suitable for future development, either during this plan period or beyond. This is returned to in more detail below in relation to Policy 42.</p> <p>The site is sustainably located, being served by bus routes and benefiting from a strong surrounding residential catchment area. This includes the Oadby Student Village, which is located approximately 250m to the north east. The site is also located in relatively close proximity to Oadby district centre, which is approximately 780m to the south east.</p> <p>The site is entirely within the ownership of Leicester Racecourse Holdings Ltd and is available for development now. It is not currently publically accessible and benefits from an existing vehicular access from Leicester Road. The site is considered entirely suitable for retail use, given the clear need for additional convenience floorspace and the lack of in or edge of centre sites in Oadby.</p> <p>It is recognised that the site is currently identified as part of the Oadby and Wigston Green Wedge. It is, however, argued by our client that the site should be removed from this designation. The reasons for this are set out in more detail below in relation to Policy 42 –</p>	
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		<p>Green Wedges.</p> <p>In light of the above, Policy 22 is not considered to be 'sound' given that:</p> <ul style="list-style-type: none"> • It is not positively prepared – given that the Policy 22 fails to make provision for the retail needs of the Borough, particularly with regards to the need for deep discounter provision in Oadby; • It is not justified – given that Policy 22 does not represent the most appropriate strategy, on the basis that it fails to provide for sufficient levels of additional convenience floorspace; and • It is not consistent with national policy – given the failure of the LPA to objectively identify sites for sufficient retail floorspace over the plan period. 	
		<p>Policy 42 – Green Wedges</p> <p>Policy 42 states that Green Wedges protect “important areas of green land within the Borough and seek to retain these areas as open and undeveloped”. It continues by setting out the objectives of all Green Wedges as follows:</p> <ul style="list-style-type: none"> • Preventing the merging of settlements; • Guiding development form; • Providing a 'green lung' between the urban area and the countryside; and • Acting as a recreational resource. <p>In order to achieve the above, Policy 42 restricts the uses that are allowed within Green Wedges to a limited range of uses, including agricultural, outdoor leisure, forestry and burial grounds. Our client does not wish to comment on the wording of Policy 42 per se, or the</p>	<p>Comment noted. No proposed change to the Local Plan document for the reasoning set out below.</p> <p>The purpose of the Council's Green Wedge Review is to assess the boundaries of the existing green wedge designations, as defined on Council's Saved Local Plan Proposals Map and the Council's Adopted Policies Map. The review took into account the Broad Location for Growth Areas identified within the Strategic Housing Land Availability Assessment and the options for greenfield release sites identified within the Council's Preferred Options Local Plan consultation document. Each of the existing green wedges was assessed against the functions set out in the Leicester and Leicestershire Green Wedge Review Joint Methodology to see whether or not the current designated boundaries should be kept the same or amended.</p> <p>As stated within the review document, for the purpose</p>

		<p>nature of uses permissible within defined Green Wedges. Our client, however, does not consider that the policy is 'sound' on the basis of the extent of land included within the Oadby and Wigston Green Wedge. The current boundaries include land within the Green Wedge that should be removed. This is on the basis that there are sites that do not fulfil the objectives of including land within a Green Wedge.</p> <p>It is recognised that the Council has undertaken a Green Wedge Review (2017) as part of its evidence base. The purpose of the review was to assess the boundaries of the existing Green Wedge designations, as defined by the saved Local Plan Proposals Map and the Adopted Proposals Map.</p> <p>Despite undertaking this review, the Pre-Submission Plan still includes land that does not meet the objectives of including land within the Green Wedge. The Green Wedge Review breaks down the wider Oadby and Wigston Green Wedge into five sub areas.</p> <p>The sub areas are based on the defined land-use and landscape areas set out in the Green Wedge Management Strategy, which dates back to 2004. It is our view that the Green Wedge includes land that fails to meet the defined objectives. By including land unnecessarily within the Green Wedge, the Pre-Submission Plan is limiting the ability of what are otherwise sustainable sites from being brought forward for development during the plan period. This is evident in the inclusion of land within our clients ownership within the Oadby and Wigston Green Wedge.</p> <p>Our clients wider land holding at Leicester Racecourse is included within the defined Green Wedge. It is, however, argued that part of this land holding,</p>	<p>of the review document the Oadby and Wigston Green Wedge was assessed at an overall 'macro' scale, however to ensure a good level of detail the Oadby and Wigston Green Wedge was split down into five sub areas to aid the review process.</p> <p>The land area submitted by Turley is situated within Sub Area 1 of the Oadby and Wigston Green Wedge (as defined within the review document) and is specifically mention within the conclusions on page 24 of the review document. The review states that 'the most northern tip of the green wedge, for example the racecourse land and land north of Palmerston Way is key in preventing the merging of the built up areas of Oadby and Leicester City.</p> <p>It is also evident that the land area to the north of Palmerston Way effectively guides the development / urban form of Leicester City. With Palmerston Way (highway) being defined as built development, should the land area to the north be removed from the Oadby and Wigston Green Wedge, the two urban areas of Leicester City and Oadby will coalesce.</p> <p>It should be noted that the Council would not preclude development of the site proposed by Turley, however with its designation as Green Wedge, any development proposals for the site would need to comply with Local Plan Policy 42 Green Wedges (or current Core Strategy Policy 6 Green Wedges).</p>
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		<p>extending to 3.1 ha, should be removed from the Green Wedge. It is surplus to the operational requirements of the Racecourse. The site is located to the south west of Leicester Road and is segregated from the wider Green Wedge by Palmerston Way.</p> <p>It is argued that the site could be removed from the Green Wedge without compromising the objectives of including land within the Green Wedge. This position has been considered in more detail by Tyler Grange and is addressed in a separate note attached to these representations as Appendix 2.</p> <p>The site is located in sustainable and highly accessible location. It is in close proximity to Oadby district centre and a range of employment opportunities, services and facilities. The site is bound by existing residential development to the west and main arterial roads to the north, south and east. The site is also adjoined by a petrol filling station to the north west. As stated above, the site is separated from the remainder of the Green Wedge by Palmerston Way. It therefore forms a self-contained development parcel, well located to both Oadby and the Leicester City urban area.</p> <p>There are limited available land parcels that are well located to the Leicester urban area. The land within our clients control represents such a site. Its identification within the Green Wedge, however, effectively restricts its ability to accommodate future development requirements over the course of the plan period, whether to meet needs within the Borough or Leicester City.</p> <p>As set out above, part of the site is considered suitable to accommodate a deep discounter foodstore. The general location of the foodstore could be to the south</p>	
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		<p>west of Leicester Road close to the existing petrol filling station. The remainder of the site is also considered suitable for development, either through this plan period or future reviews. The wider site is considered suitable to accommodate a range of development uses that would complement the proposed deep discounter foodstore, including residential, commercial (including a hotel) and education uses. This position is consistent with our clients submission through the Call for Sites process.</p> <p>The land controlled by our client is located with Sub Area 1, as considered by the Green Wedge Review. The review states that a majority of the area is in use as Leicester Racecourse and the former Oadby Municipal Golf Course. It is recognised that the area has part of Palmerston Way running through it towards its northern tip.</p> <p>The Review also recognises that part of the area has been promoted for development, the northern most area of the Green Wedge boundary. It is understood that this reference relates to the land within our clients ownership. There is no further reference to this parcel specifically, or its potential release for future development in the Review. The assessment of whether the designation meets the four identified objectives is undertaken for the Oadby and Wigston Green Wedge as a whole. The assessment is not undertaken at a more detailed level, based on the Sub Areas previously identified. In doing so, the assessment is more broad-brush given that the Green Wedge as a whole extends to approximately 168 ha (within the Borough boundary).</p> <p>The assessment undertaken as part of the Review therefore fails to address the variations between the</p>	
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		<p>land included within the wider Green Wedge designation. This results in a more generic assessment, that fails to identify potential areas of land that could be released from the Green Wedge.</p> <p>A detailed assessment of how our clients site scores against the four criteria set out in the Green Wedge Review is set out in the report included at Appendix 2. In summary, the report demonstrates that the site does not contribute to the role of any of the four objectives of including land within the Green Wedge.</p> <p>Moreover, the report concludes that the site is separated from the remainder of the Green Wedge by Palmerston Way and has the potential to accommodate development that would not fundamentally impact upon the separation of Oadby and Leicester or the openness of the Green Wedge in this location. The report also notes that there are opportunities to bring forward development that could facilitate landscape and wildlife enhancements and recreational opportunities.</p> <p>In light of the above, Policy 42 is not considered 'sound' on the basis that:</p> <ul style="list-style-type: none"> • It is not positively prepared – given that the policy includes land within the defined Green Wedge that fails to meet any of the identified objectives. This unnecessarily impedes the ability of otherwise sustainable sites in meeting future development and infrastructure needs, including unmet requirements from neighbouring authorities, over the plan period. • It is not justified – given that it does not represent the most appropriate strategy, by protecting land within the existing Green Wedge unnecessarily to the 	
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		<p>detriment of bringing forward sustainable development. This is particularly so in light of the pressing need to deliver new development over the land period, both to meet the Borough's own needs and those of Leicester City.</p> <ul style="list-style-type: none"> • It is not effective – given that the Plan identifies land within the Green Wedge that fails to meet the defined objectives and is capable of meeting future development needs for both the Borough and neighbouring authorities. • It is not consistent with national policy – given that the identification of land within the Green Wedge that does not serve the defined purpose, restricts the ability of the Plan to bring forward the delivery of sustainable development. 	
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Appendix B

Representations received during the Preferred Options Local Plan Consultation November to December 2016 (with Officer responses)

Consultation Response Received (Date)	Representation Received From	Policy Issues Raised	Response Given From Local Planning Authority (LPA)
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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.
8/11/16	Sport England	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	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>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 Assessing Needs and Opportunities Companion Guide attached to PPG17 which uses the ‘standards’ approach.</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 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</p>
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			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 not 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 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	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. The Pre Submission Local Plan document will also be underpinned by robust evidence base.

		<p>have no solutions.</p> <p>This was just from my first glance at the document..</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>
24/11/16	Planning Bureau Limited (Affordable Housing Provision For	<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</p>	<p>The support is acknowledged and welcomed by the Council.</p>

	Elderly Population)	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.	
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>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</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>

		Council's approach as we are very concerned that a 50% affordable housing requirement would render specialist older persons' housing unviable in the Authority.	
5/12/16	Keith Ambridge (Local Resident)	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>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	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 improve health and wellbeing.	The Council acknowledges and welcomes Natural England's comments.

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	Sustainability Appraisal Report 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	Habitats Regulations Assessment (HRA) Screening Report We note the conclusion that the potential for	Comment noted.

		<p>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>Policy 4.2 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 their overall strategy, particularly with regard to the need to allocate specific sites for new development.</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>

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 Draper Property	<p>Policy 7.1</p> <p>Of the draft PO Plan indicates that the Borough Council will allow greenfield releases outside of the urban area where the need cannot be met through development within the town centres and the Leicester</p>	<p>Comment noted.</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</p>

		<p>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>sufficient land to ensure choice and competition in the market.</p>
9/12/16	Hunter Page Planning On Behalf of Farmcare Ltd	<p>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.</p>	<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	Hunter Page Planning On Behalf of Farmcare Ltd	<p>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 (criteria 7, 9, 10 and 11). Any adverse impacts on biodiversity can be adequately mitigated through the site's development,</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 2031 is sustainable, located in the most appropriate location, viable and deliverable.</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 principle, do not take into account potential mitigation measures, as there is no guarantee of these being delivered.</p>

		resulting in an enhancement of the site's biodiversity value.	
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	Chapter 4, Page 32, Policy 4.2 The Theatres Trust welcomes this policy, particularly the second last dot point which 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	Chapter 5, Page 43, Policy 5.4	The Council acknowledges and welcomes the Theatre

		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.	Trust's comments.
9/12/16	Theatres Trust	<p>Chapter 8, Page 84, Policy 8.2</p> <p>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.</p> <p>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></p>	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 this context, Highways England considers that there will be no impacts on the operation of the SRN, especially given the distance of	The Council acknowledges and welcomes the Highways England comment.

		the nearest section of SRN from the Local Plan area.	
12/12/16	Highways England	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.	The Council acknowledges and welcomes the Highways England comment.
12/12/16	Highways England	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. Highways England has no further comments to provide at this stage and trusts the above is useful in the progression of the Oadby and	The Council acknowledges and welcomes the Highways England comment.

		Wigston Local Plan.	
13/12/16	Historic England	<p>Evidence base</p> <p>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"> • Updating conservation area appraisals • Undertaking characterisation studies • Producing setting studies – of specific settlements, or specific heritage assets • Local lists • Assessments of landscape sensitivity <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>Chapter Two – Spatial Portrait</p> <p>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 reflect the NPPF, such as ‘heritage assets and their settings’, which may be best placed within a separate bullet point.</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>

13/12/16	Historic England	<p>Chapter Three – Vision and Objectives 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>Objectives for the Local Plan 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>7.2 Kilby Bridge Village Envelope 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> <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</p>

			<p>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>Policy 7.3 Stoughton Grange 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 detrimental impact on the surrounding Green Wedge and Countryside and will conserve and better reveal the historic significance of</i></p>	<p>Policy 7.3 will be amended to better reflect the historic and archaeological character of the Stoughton Grange site.</p>

		<i>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>7.4 Oadby Sewage Treatment works 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>7.5 Wigston Direction for Growth 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	<p>7.6 Regeneration Schemes and Large Scale Change In order to ensure that heritage assets are fully assessed, a further bullet point within</p>	<p>Comment noted.</p> <p>A further bullet with the wording suggested will be added to the Regeneration Schemes and Large Scale</p>

		Policy 7.6 is recommended:- <i>“Conserve and enhance heritage assets and their settings”</i>	Change policy.
13/12/16	Historic England	9.1/2 Primary / Secondary frontages 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?	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.
13/12/16	Historic England	Policy 9.6 Shop Fronts Policy 9.6 is strongly welcomed.	The Council acknowledges and welcomes the Historic England comment.
13/12/16	Historic England	10.4 Culture and Historic Environment Assets 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 their settings as well as the character and setting of areas of acknowledged significance.”</i>	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>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>Policy 10.5 Development in Conservation Areas Policy 10.5 is welcomed.</p>	The Council acknowledges and welcomes the Historic England comment.
13/12/16	Historic England	<p>Policy 10.7 Countryside Reference to archaeological or historic resources is welcomed.</p>	The Council acknowledges and welcomes the Historic England comment.
13/12/16	Historic England	<p>Policy 10.8 Landscape and Character 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>Chapter 6: Housing Delivery 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 and other economic factors impacting development. Rentplus is an innovative product that can deliver significant quantities</p>	Comment noted.

		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 Policy 6.1: Housing Choices 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)	<p>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 evidence of need and an understanding of the viability implications of such a policy. The Council should review the need for this.</p>	<p>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.</p>

13/12/16	Tetlow King Planning (C/O Rent Plus)	<p>The approach set out in Policy 6.3: Affordable Housing and Starter Homes 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>	<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"> <i>i. require residential developments to provide affordable housing which is accessible to local people in housing need;</i> <i>ii. state the threshold above which affordable housing is to be sought;</i> <i>iii. state the amount of affordable housing to be provided on suitable sites above the threshold;</i> 	<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>

		<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>
14/12/16	Councillor Andrew Collins On Behalf of	I have looked at the Preferred Options Document and would make the following	The Council acknowledges and welcomes the Kilby Parish's comments.

	Kilby Parish Council	<p>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>	
15/12/16	Denise Taylor (Local Resident)	<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> <p>All of the events that the team held were very well attended and the number of comments submitted to</p>

			<p>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 communities, pursuing sustainable development in accordance with the National</p>	<p>The Council acknowledges and welcomes the support of Planning and Design Group.</p>

		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 and deliverable early within the Plan period.	Comment noted.

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	Policy 4.2- (HEDNA) 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 Bowbridge Land	Objective 7 supported in principle, but should include objectively assessed need with regard to housing figures (pp. 47, NPPF).	Comment noted.
15/12/16	Landmark	Objective 8 should include new housing	Comment noted. Objective 8 will be amended to

	Planning On Behalf Of Bowbridge Land	within land adjacent to key urban areas (Oadby, Wigston & South Wigston), not just the key centres of the borough.	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>Policy 4.2 (pp. 31)</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>Policy 5.3 (pp. 40)</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.
15/12/16	Landmark Planning On	Policy 5.5 (pp. 46/47)	The Council acknowledges and welcomes the support of Landmark Planning.

	Behalf Of Bowbridge Land	Support para 5.50 of the LPPO. (Sutton Close site could fulfil this requirement by linking existing and new residents within the area). Para 5.50 should support the promotion of new green infrastructure as part of new development.	
15/12/16	Landmark Planning On Behalf Of Bowbridge Land	Policy 6.2 (pp. 58) 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.	Comment noted.
15/12/16	Landmark Planning On Behalf Of Bowbridge Land	Policy 7.1 (pp. 66) 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. Assessment of SA sites indicates that Sutton Close is favourable location for housing development, despite greenfield status and potential of coalescence with existing settlements.	Comment noted. 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.
15/12/16	Landmark Planning On Behalf Of Bowbridge Land	Policy 10.6 (pp. 124) The principle of Green Wedges are supported, however current Green Wedge designations include land that is considered to be sustainable locations for development	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>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>Local Green Space Designations</p> <p>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"> • All the sites are local in character and reasonably close to the community • 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. • All the sites are local in character, and none are extensive tracts of land. 	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 Saffron Road area re its historical connections with the Glen Parva Grange</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>

		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.

15/12/16	Mary Ray & Tony Sumpter (Saffron Tree Action Group)	<p>Use of Language and the LUC Sustainability Assessment</p> <p>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>
15/12/16	Mary Ray & Tony Sumpter (Saffron Tree Action Group)	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	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>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>

		<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>Local Green Spaces and Green Infrastructure should be in Chapter 10: Protected Places 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>

		<ul style="list-style-type: none"> • 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) • 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. • 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. • 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. <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>Corporate Priorities (p 9-10) 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>

		working groups. Both confirmed to us they will do so before the 16 th .	
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)	Green Infrastructure Policy wording is weaker than in the Core Strategy 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.

		<p><i>Green Infrastructure assets will be protected, managed and where necessary enhanced by:</i></p> <ul style="list-style-type: none"> • <i>Protecting and enhancing Green Infrastructure assets and creation of new multi-functional areas of green space;</i> • <i>Seeking opportunities to link fragmented habitats, protect vulnerable habitats and integrate biodiversity within communities;</i> • <i>Not permitting development that compromises the integrity of the overall Green Infrastructure networks;</i> • <i>Requiring that all new development must be designed to protect and enhance existing Green Infrastructure in the local area;</i> • <i>Managing development to secure a net gain in Green Infrastructure</i> • <i>Using developers contributions to facilitate improvements to their quality and accessibility;</i> • <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> 	
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"> • Issues and Challenges in Core Strategy (p.26) refers to: <i>"The quality</i> 	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><i>of the built environment</i> <i>Protection and enhancement of green infrastructure”</i></p> <ul style="list-style-type: none"> • 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’. • 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. • Spatial Objective 12 in the Strategy (p.33) is stronger than Objective 2 in the Plan (p.26) • 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> • P.32, Policy 4.2 -the reference to Green Infrastructure in the 	
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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)	Landscape and Character (p.127) 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.

		<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>	
15/12/16	Mary Ray & Tony Sumpter (Saffron Tree Action Group)	<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>

		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>Biodiversity Audit and Green infrastructure Plan don't cover the whole of the Borough.</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>The draft Plan still refers to the 2009 version – that needs to be corrected throughout.</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>

		<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"> • 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> • 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> 	
15/12/16	Mary Ray & Tony Sumpter (Saffron Tree	<p>Integrate Policies more strongly by cross-referencing through the whole document References to development appear</p>	<p>Comments noted. Consideration will be given to stronger integration of</p>

	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"> • 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. • 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 	policies throughout the document.
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		<p>biodiversity and geodiversity.</p> <ul style="list-style-type: none"> 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. 	
15/12/16	Mary Ray & Tony Sumpter (Saffron Tree Action Group)	<p>Use South Wigston examples</p> <p>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"> 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 	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>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"> • 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. 	
15/12/16	Mary Ray & Tony Sumpter (Saffron Tree Action Group)	<p>Miscellaneous 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>

		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.

	(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.

		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>Page 76. Policy 7.1: Housing Allocations 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	Page 27. Objective 8: A Balanced housing Market.	The Council has to actively allocate and identify land for housing (amongst other uses) to ensure that it

		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	Page 28. Objective 10: An Accessible Borough. 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	Page 38 paragraph 5.19 ----Bullet point 6 Add "be attractive and of good Architectural quality." Page 40. Policy 5.3: High Quality Design and Construction. 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	Page 116/117. Policy 10.3: Sustainable Drainage and Surface Water. 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	Chapter 2 – Spatial Portrait 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.

		<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>Chapter 5 – Healthy Communities 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>Chapter 6 – Housing Delivery 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.

		<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>Chapter 7 – Allocations and Regeneration Opportunity Areas</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.

		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	Chapter 10 – Protected Places 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"> • <i>Agriculture, horticulture and allotment;</i> • <i>Outdoor leisure (and related indoor leisure),</i>

		<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"> • <i>Agriculture, horticulture and allotment;</i> • <i>Outdoor leisure, recreation and sporting facilities;</i> • <i>Forestry and bodies of water;</i> • <i>Footpaths, bridleways and cycle ways; and,</i> • <i>Burial grounds.”</i> <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"> • <i>Forestry and bodies of water;</i> • <i>Footpaths, bridleways and cycle ways; and,</i> • <i>Burial grounds.”</i>
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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	Closing 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	Housing Land Requirement 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.

	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	South-East Wigston Direction for Growth	Comment noted.

	Planning On Behalf Of Barratt Homes & David Wilson Homes	<p>– Phase 2</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	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.	Comment noted.
16/12/16	Pegasus Planning On Behalf Of	Paragraph 7.20 notes that the Direction for Growth area was originally defined in the Core strategy and that a scheme for 450	Comment noted.

	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"> • At least 2.5 hectares of employment land; • Site access from Welford Road; 	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.

		<ul style="list-style-type: none"> • A link road through the site from Welford Road to Newton Lane. • A new primary school; • A new local centre; • New community hall and outdoor sports space. 	
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.

	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	Other Matters 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.

		<p>and lack sufficient justification. We would offer the following comments on these policies.</p> <p>Policy 5.1, Creating a Skilled Workforce, 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>Policy 5.2, Improving Health and Wellbeing, 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>

		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	Policy 6.1, Housing Choices , 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.

		<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 & David Wilson Homes</p>	<p>Policy 6.2, Housing Density, 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	Policy 6.3, Affordable Housing and Starter	Comment noted.

	<p>Planning On Behalf Of Barratt Homes & David Wilson Homes</p>	<p>Homes 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>Distribution of Growth 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>

		<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 & 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 & 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>Housing Allocations 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>

		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>Green Wedges</p> <p>Kodiak understand that in urban fringe districts such as Oadby & 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>Vision & Objectives</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.

		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”.	
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 & 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	The “brief” for the preparation of the Local Plan is, therefore, very clear. Ensuring that there is a continual supply of both market and	Comment noted.

		<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 & 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>	
16/12/16	Define Planning On Behalf Of Bloor Homes	<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>	Comment noted.

		<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>	
16/12/16	Define Planning On Behalf Of Bloor Homes	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.	Comment noted.
16/12/16	Define Planning On Behalf Of Bloor Homes	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.	Comment noted.
16/12/16	Define Planning On Behalf Of Bloor Homes	Local Plan Position Statement 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	Comment noted.

		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.

		<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>	
16/12/16	Define Planning On Behalf Of Bloor Homes	<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 positive outcome 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>

		<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 <i>fait accompli</i>. 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>Policy 4.2 Spatial Strategy for Development in the Borough 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>

		“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>

		(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>

		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).	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.
16/12/16	Define Planning On Behalf Of Bloor Homes	<p>Policy 6.1 Housing Choices</p> <p>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>	Comment noted.
16/12/16	Define Planning On Behalf Of Bloor Homes	<p>Policy 6.2 Housing Density</p> <p>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>	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>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	Define Planning On Behalf Of Bloor Homes	<p>Policy 6.3 Affordable Housing and Starter Homes</p> <p>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.</p> <p>The Council acknowledges and welcomes the support of Define Planning.</p>

		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>Policy 7.1 Housing Allocations 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>

		<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>Policy 7.5 Wigston Direction for Growth Area 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.

		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>Policy 10.2 Climate Change, Flood Risk and Renewable Low Carbon Energy 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.

		<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>Policy 10.7 Countryside 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>

		<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>Policy 11.1 Infrastructure and Developer Contributions</p> <p>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.

		<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>Section 12 Monitoring and Review</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>

		<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>

		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.

		<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>Page 27, Objectives 7 & 8</p> <p>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.

	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>Page 29, Paragraph 4.5 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>Page 31, Policy 4.2 'Spatial Strategy For Development Within The Borough' 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>

		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	Page 40, Policy 5.3 'High Quality Design & Construction' 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	Page 46/47, Policy 5.5 'Green Infrastructure' 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.

	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>Page 58, Policy 6.2 Housing Density</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>

		<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>Page 66, Policy 7.1 Housing Allocations</p> <p>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>

		<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>
16/12/16	<p>Landmark Planning On Behalf Of Davidson's Developments Ltd</p>	<p>Page 124, Policy 10.6 Green Wedges 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>

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>OAN and Housing Delivery 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>

		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>Green Wedges & Countryside</p> <p>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>Conclusions</p> <p>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>Duty to Cooperate</p> <p>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>

		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	Sustainability Appraisal/Strategic Environmental Assessment 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.	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'. 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.
16/12/16	Gladman Developments	OAN And Housing Delivery 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	Comment noted.

		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.

		<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>Green Wedges and Countryside 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>

		<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)³ 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>CONCLUSIONS</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.

		<p>Chapter 2- Spatial Portrait Para 2.39, Page 20-21</p> <p>The Canal & 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>Chapter 5- Healthy Communities Policy 5.2, Page 36</p> <p>The Canal & 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>Chapter 7 Allocations & Regeneration Opportunity Areas (Para 7.10, Page 69)</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>

		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>Chapter 7 Allocations & Regeneration Opportunity Areas (Policy 7.2, pp. 69-70)</p> <p>The Canal & 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	Chapter 11- Delivery Plan (Policy 11.1, pp. 131)	The Council acknowledges and welcomes the support of the Canal and Rivers Trust.

		<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>Local Plan Position Statement 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 & Wigston and the wider HMA are addressed.</p>	The Council is committed to working alongside all of the local authorities within the Leicester and Leicestershire HMA under the Duty to Cooperate.
16/12/16	Leicester City Council	<p>Chapter 2 – Spatial Portrait Paragraph 2.32 This paragraph states that: <i>“The Eastern District Distributor Road was</i></p>	Comment noted.

		<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 & traffic movements around the Eastern side of Leicester as highlighted by the Joint Oadby & Wigston, Harborough DC & Leicester Local Plan Transport Evidence study (Edwards & Edwards Study) and in advance of emerging Strategic Transport Study currently being prepared.</p>	
16/12/16	Leicester City Council	<p>Chapter 4 – Sustainable Places 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>

		<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>Chapter 5 – Healthy Communities 5.6 Open Space, Sport and Recreation Facilities</p> <p>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>Chapter 7 – Allocations and Regeneration Opportunity Areas Policy 7.1 – This policy states that:-</p> <p><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>

		<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>Policy 7.5 – Wigston Direction for Growth Area 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 & 8.4.2 mention the needs for joint working between O&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>Chapter 8 – Economic Prosperity 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>

		<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>Chapter 11 – Delivery Plan 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>

		<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>	the local authorities within Leicester and Leicestershire.
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>	The Council acknowledges and welcomes the support of Leicester City Council.
16/12/16	Leicester City Council	<p>Education 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>	Comment noted.
16/12/16	Leicester City Council	<p>Sustainability Appraisal The preferred options sustainability appraisal assesses a long list of sites despite these not being identified in the Preferred Options</p>	<p>Comment noted.</p> <p>SA is required to assess the proposed sites and reasonable alternatives. SA is required to assess the</p>

		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.

		<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>	
16/12/16	Leicestershire County Council	<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⁽¹⁾, 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>

		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.

		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>Communities & Well Being Service</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>Chapter 2- Spatial Portrait</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>

		<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>Chapter 5- Healthy Communities</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>Paragraph 5.8 Public Realm; 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>Chapter 6- Housing Delivery</p>	<p>Comment noted.</p>

		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>Chapter 7- Allocations & Regeneration Opportunity Areas</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>Chapter 8- Economic Prosperity</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>

		<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 & Wigston area¹ 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>¹An 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>Chapter 9- Town Centre Development</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>Waste Management</p> <p>Waste Management highlights that any development in the Borough of Oadby & 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>

		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>Education</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.

		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	Strategic Assets (Policy 4.1, Para 8.49, Policy 6.1) 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.

		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>Housing Delivery</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>

		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>HOUSING</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.

		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.

		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.

		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.

		<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>Policy 5.6</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>

		<p>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.</p>	<p>importance of street trees in urban environments.</p>
16/12/16	Woodland Trust	<p>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.</p>	<p>The Council is always keen to engage and work with key stakeholders.</p>
16/12/16	Woodland Trust	<p>Policy 10.1</p> <p>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.</p>	<p>The Council acknowledges and welcomes the support of the Woodlands Trust.</p> <p>The Council will seek to take account of the Woodlands Trust comments within Policy 10.1 in the Pre-Submission Local Plan document.</p>
16/12/16	Woodland Trust	<p>Policy 10.2</p>	<p>The Council will seek to take account of the Woodlands Trust comments within Policy 10.2 and</p>

		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>Policy 10.4</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.

		<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 & 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 & 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.

		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.	<p>Comment noted.</p> <p>The correction will be made throughout the document to refer to the Wigston Direction for Growth.</p>
16/12/16	CO-OP Estates	<p>Policy 5.6 (Open Space, Sport and Recreation Facilities)</p> <p>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.</p>	<p>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.</p>
16/12/16	CO-OP Estates	<p>Policy 6.1 (Housing Choices)</p> <p>5.1 The Co-op support the pragmatic</p>	<p>Comment noted. The Council welcomes the support of Co-Op Estates.</p>

		<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>

		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>

		<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>

		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>

		<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>

		<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.

		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.

		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.

		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

		<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"> • 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). 	<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 & 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>

		<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>	of Environment Agency.
10/1/17	Environment Agency	<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"> • Appropriate land at lower risk is not available and this has been evidenced through the application of the NPPF Sequential Test. <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>

		<ul style="list-style-type: none"> • 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. 	
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>

		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 & 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.

		should be avoided. Comments on mitigation and compensation should then follow with compensation for habitat loss only being considered as an absolute last resort.	
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>

		<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>

		<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>

	<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>Local Plans and ancient woodland – Forestry Commission approach</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>	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>appropriateness of sites for future development, and to highlight opportunities for achieving your renewable energy obligations.</p> <p>A summary of Government policy on ancient woodland Natural Environment and Rural Communities Act 2006 (published October 2006). Section 40 – “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>National Planning Policy Framework (published March 2012). Paragraph 118 – “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>National Planning Practice Guidance – Natural Environment Guidance. (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 non-statutory consultee 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 Natural England's Ancient Woodland inventory), 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 ancient woodland is an irreplaceable habitat, and that, in planning decisions, 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. It highlights the Ancient Woodland Inventory as a way to find out if a woodland is ancient.</p> <p>Standing Advice for Ancient Woodland and Veteran Trees. (Published April 2014) The Forestry Commission has prepared joint standing advice 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 Natural England's Ancient Woodland Inventory, assessment guides 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. Case Decisions 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 website.</p> <p>The UK Forestry Standard (3rd edition published November 2011). Page 24 "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>Keepers of Time – A Statement of Policy for England's Ancient and Native Woodland (published June 2005). Page 10 "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>Natural Environment White Paper “The Natural Choice” (published June 2011) Paragraph 2.53 - This has a “renewed commitment to conserving and restoring ancient woodlands”.</p> <p>Paragraph 2.56 – “The Government is committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland sites”.</p> <p>Biodiversity 2020: a strategy for England’s wildlife and ecosystem services (published August 2011). Paragraph 2.16 - Further commitments to protect ancient woodland and to continue restoration of Plantations on Ancient Woodland Sites (PAWS).</p> <p>Renewable & 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 the role of trees in delivering planning objectives as part of a wider integrated landscape approach. For instance through:</p> <ul style="list-style-type: none"> • the inclusion of green infrastructure (including trees and woodland) in and around new development; and • the use of locally sourced wood in construction and as a sustainable, carbon lean fuel. 	
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Appendix C

Representations received during the Key Challenges Local Plan Consultation 2015 (with Officer responses)

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
Oadby and Wigston Key Challenges (Regulation 18) Consultation (October 2015)			
Planning for the Housing and Jobs that the Borough Needs: The Location of New Development			
<p>1. Do you agree or disagree with the Council's assessment that 95 new homes will need to be provided each year in the Borough up to 2036 (or 100 new homes each year up to 2031)?</p>	<p>Pegasus Group (on behalf of Barratt and David Wilson Homes)</p>	<p>Concerned over the robustness of the 2014 SHMA and consider that it should be reviewed.</p> <p>'Unmet need' in establishing a 'policy on' housing requirement will be a particular issue for the Borough considering the close physical and functional relationship with Leicester City. This will need to be addressed through the Duty to Co-operate.</p> <p>The housing requirement for the Borough is likely to be above 95-100 dwellings per annum.</p>	<p>The Council are currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing.</p> <p>Local planning authorities in the HMA have mechanisms in place that enable joint working and addressing such matters under the Duty to Co-operate.</p> <p>Noted.</p>
	<p>The Co-operative</p>	<p>Disagree. This is considered to be insufficient. Reference to a</p>	<p>The Council are currently</p>

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
	Group	High Court conclusion the Borough does not have a 5 year housing land supply. Also reference to Planning Inspector decisions that even where there is a 5 year housing land supply, in area such as the Borough of Oadby and Wigston which have a challenging housing trajectory, housing requirements should be boosted to provide flexibility and ensure delivery.	undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing.
	Define (on behalf of Bloor Homes Limited)	Concern over the robustness of the 2014 SHMA. The suggested provision of 95 - 100 dwellings per annum does not reflect the Full Objectively Assessed Need for the Borough or a 'sound' policy housing requirement.	The Council are currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing.
	Leicestershire County Council	Support the development of evidence to underpin the 2031-36 part of the Local Plan and will work together on the Strategic Growth Plan and any other evidence base appropriate.	Noted.
	Home Builders Federation	Concern over the robustness of the 2014 SHMA which is considered to under-estimates Full Objectively Assessed Need.	The Council are currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing.

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
	Landmark Planning	Disagree. Concern over the robustness of the 2014 SHMA and does not take account of the ongoing work on the Strategic Growth Plan and potentially misses the opportunity to boost significantly the supply of housing for the next plan period.	The Council are currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing.
	Gladman Developments	Concerned over the robustness of the 2014 SHMA and consider that it should be reviewed.	The Council are currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing.
	Mary Ray	The housing requirement is set and cannot be changed. Should seek minimum number possible due to small size of the Borough with minimum land in order to prevent loss of natural assets.	The Council are currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing.
	Environment Agency	Yes	Noted.

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
<p>2. Which parts of the Borough do you think should be identified for development in the future?</p>	<p>Pegasus Group (on behalf of Barratt and David Wilson Homes)</p>	<p>Direction for Growth to the South East of Wigston – consider this to be the most sustainable option; understood that the Council’s strategy was that this would provide the longer term growth strategy for the Borough. Barratt/David Wilson Homes have prepared a Materplan showing the potential for further development in this location, including the potential to provide new community facilities.</p>	<p>The Council will test all options during the course of preparing the Local Plan.</p>
	<p>The Co-operative Group</p>	<ul style="list-style-type: none"> • Sustainable locations close to the main urban areas, which already provide employment and service uses – such as Stoughton Grange and land around Spire Hospital. • Green Wedge locations that are washed over by the designation but do not accurately perform the definition. 	<p>The Council will test various options during the course of preparing the Local Plan.</p> <p>A review of Green Wedges will be undertaken in the course of preparing the Local Plan.</p>
	<p>Define (on behalf of Bloor Homes Limited)</p>	<ul style="list-style-type: none"> • Oadby. Recent development strategy has directed development elsewhere and the housing needs of Oadby’s residents are not being met, particularly in respect of affordable housing. 	<p>Noted The Council will test various options during the course of preparing the Local Plan.</p>
	<p>Home Builders Federation</p>	<p>In order to maximise housing supply the widest possible range of sites, by size and market location, is required.</p>	<p>Noted. The Council are currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform</p>

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
			policies related to housing.
	Environment Agency	Areas that are close to existing developed areas and do not lie in areas of flood risk. Where there is existing appropriate infrastructure capable with dealing with additional development.	Noted.
	Gladman Developments	Sustainable settlements, including any in the rural area that are considered by reason of their services and facilities to be sustainable.	Noted.
	Mary Ray	None.	Noted.
	Landmark Planning	The whole Borough should be the subject of a further 'policy off' review, including an assessment of sites designated as green wedge for, if appropriate, a selective release.	The SHLAA considers all potential sites in a 'policy off' context. A review of Green Wedges will be undertaken in the course of preparing the Local Plan.
3. What are the cross-boundary issues that you think we should be considering in Oadby and Wigston?	Pegasus Group (on behalf of Barratt and David Wilson Homes)	<ul style="list-style-type: none"> • Issues relating to 'unmet need' • Issues between the city and county in relation to how affordable housing needs are met. 	Local planning authorities in the HMA have mechanisms in place that enable joint working and addressing such matters under the Duty to Co-operate.
	Define (on behalf of Bloor Homes)	<ul style="list-style-type: none"> • Issues between the city and county in relation to how affordable housing needs are met. There is no evidence of any agreement between the authorities over this or that it is 	Local planning authorities in the HMA have mechanisms in place that enable joint working and

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
	Limited)	<p>a matter of discussion under the Duty to Co-operate.</p> <ul style="list-style-type: none"> • Commuting patterns. • That the Borough should meet its own needs in accordance with the NPPF, a key principle of sustainable development and so as not to require residents to move away from their home area. • Whether Leicester City Council can meet its own housing needs; the effect of this on affordable housing provision in the Borough; and, whether any shortfall in Leicester will need to be met in the Borough. 	addressing such matters under the Duty to Co-operate.
	Gladman Developments	Given the proximity of the district to Leicester and the close interaction of the housing and labour markets between Leicester and Oadby and Wigston it is essential to understand whether Leicester can meet its full objective assessment of housing need. If not, which is likely, then Oadby and Wigston borough must seek to ensure that the unmet needs from Leicester are delivered within the Housing Market Area in line with paragraph47 of the framework.	Local planning authorities in the HMA have mechanisms in place that enable joint working and addressing such matters under the Duty to Co-operate.
	Environment Agency	The Lead Local Flood Authority is responsible for surface water drainage from new development. They will need to ensure that the surface water run off entering the river networks do not increase the risk of flooding elsewhere. Surface water drainage from new developments in neighbouring boroughs (if not managed correctly) may have an impact of flooding in the Borough.	The Council will ensure that the Lead Local Flood Authority is involved in the preparation of the Local Plan.
	Mary Ray	Don't lose the green wedges and open spaces (parks and natural space). Minimise urban sprawl. Keep the Borough	A review of Green Wedges will be undertaken in the course of

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
		distinct from Leicester City and neighbouring districts.	preparing the Local Plan. In addition, the Council are currently undertaking evidence gathering in terms of Local Green Space and the findings of these studies will inform policies related to green spaces.
	Landmark Planning	There is a need to consider the provision of new Greenfield sites to cater for the growth of Leicester.	Local planning authorities in the HMA have mechanisms in place that enable joint working and addressing such matters under the Duty to Co-operate.
4. What public bodies should we be constructively engaging with?	The Co-operative Group	<p>Statutory Consultees; significant landowners (such as The Co-operative Group); house building industry.</p> <p>Reference to a Planning Appeal that conclusion that insufficient level of co-operation was carried out in relation to the SHMA.</p>	<p>Noted.</p> <p>Consideration will be given to undertaking an update of the SHMA jointly with other local planning authorities in the HMA.</p> <p>The Council did engage</p>

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
		Alleged that the Borough Council has failed to engage constructively with The Co-operative Group over the Stoughton Grange draft development brief.	constructively with The Co-operative Group over the Stoughton Grange draft development brief however no reply was received.
	Define (on behalf of Bloor Homes Limited)	Leicester City Council	Noted.
	Leicestershire County Council	Support the close liaison with Leicester City and other district councils to align Local Plans.	Noted.
	Hinckley and Bosworth Borough Council	Welcomes the opportunity to engage in the Local Plan at an early stage and supports joint working with other Council's in the HMA	Noted.
	Landmark Planning	Leicester City Council; Leicestershire County Council and all interested stakeholders	Noted.
	Leicester City Council	The Council understands the need for employment and housing growth and looks forward to working with Oadby and Wigston Borough Council under the Duty to Co-operate.	Noted.
	Environment Agency	Environment Agency; Lead Local Flood Authority; Severn Trent Water Ltd; Natural England; English Heritage; Highways; Police	Noted.
	Mary Ray	Natural England; Tree Council; Environment Agency.	Noted.

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
	Historic England	Historic England	Noted.
5. Are you aware of any particular sites that should be taken into consideration?	Pegasus Group (on behalf of Barratt and David Wilson Homes)	<ul style="list-style-type: none"> Direction for Growth to the South East of Wigston 	Noted.
	The Co-operative Group	<ul style="list-style-type: none"> Land at Stoughton Grange and around Spire Hospital, Oadby (in the short to medium term) and a wider part of the site in the longer term 	Noted.
	Hunter Page Planning (on behalf of Farmcare Trading Limited)	<ul style="list-style-type: none"> Land to the south and west of Oadby Lodge Farm, Gartree Road, Oadby 	Noted.
	Define (on behalf of Bloor Homes Limited)	<ul style="list-style-type: none"> Land at Cottage Farm Oadby 	Noted.
	Landmark Planning	<ul style="list-style-type: none"> Land at Sutton Close, Oadby Land at Wigston Road, Oadby (part of the Oadby Town Football Club site) 	Noted
	Mary Ray	Not current open green space or parks; the site in Marstown Avenue bordering the railway line. Avoid greenfield and resist at all costs development of large back gardens due to natural habitat, mature trees etc to protect wildlife and biodiversity.	Noted.
	6. How do you think the Council	Pegasus Group (on behalf of	There are insufficient brownfield sites to meet housing requirements to 2036 and further green field sites will inevitably

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
<p><i>should balance the amount of greenfield and brownfield land that is identified for development and how can this land be used most efficiently?</i></p>	Barratt and David Wilson Homes)	be required. It would be inappropriate and inconsistent with the NPPF for the Council to apply a sequential approach to the release of brownfield and greenfield sites.	relevant Government Acts, Regulations, policy and guidance.
	The Co-operative Group	There are insufficient brownfield sites to meet housing requirements and further green field sites will inevitably be required. Sites incorporating developed land served by existing services and employment uses should be the priority. Greenfield sites should be those closest to the existing urban area.	Noted.
	Define (on behalf of Bloor Homes Limited)	Support the regeneration of town centre sites and the use of previously developed land. However, the NPPF encourages the use of brownfield land and does not prioritise it. A brownfield 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.	Noted. The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.
	Home Builders Federation	It would be inconsistent with national policy to prioritise brownfield land before greenfield land which allows for setting a locally appropriate target for the use of brownfield land. The plan should refer to previously developed land and not brownfield land.	Noted. The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.
	Landmark Planning	The Council should be realistic about the amount of development that can be accommodated on brownfield land and not stifle Greenfield development as this would not	Noted. The Local Plan must be prepared in accordance with the relevant Government Acts,

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
		conform with the NPPF.	Regulations, policy and guidance.
	Gladman Developments	The National Planning Policy Framework encourages the re-use of previously developed land rather than prioritising it. The Council needs to analyse whether it is economically viable to bring forward brownfield sites whilst still providing the required level of affordable housing and contributing to other infrastructure requirements and community benefits. A robust assessment should be undertaken to ensure that the sites that are identified in the plan are deliverable over the plan period and maintain a rolling five year housing land supply.	Noted. The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.
	Mary Ray	Stick to brownfield, including land designated for business use, such as Brookes Factory; Alpha House; Premier Drum. Avoid small areas of natural habitat which are important to biodiversity.	Noted.
	Environment Agency	Suggest that brownfield is looked at as a priority before considering Greenfield locations.	Noted.
7. What do you think should be the minimum size of a housing site (in terms of the number of homes that it can accommodate) that is included in	Pegasus Group (on behalf of Barratt and David Wilson Homes)	Sites of 100 or more dwellings should be allocated.	Noted.
	The Co-operative Group	The size and scope of housing sites will inevitably vary.	Noted.
	Landmark	Sites of 11 dwellings or more.	Noted

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
<i>the Local Plan?</i>	Planning		
	Environment Agency	5	Noted
8. Do you think the Council should direct more development to the Direction for Growth in the future?	Pegasus Group (on behalf of Barratt and David Wilson Homes)	Yes. This is the most sustainable option and the Council has previously indicated that this is its long term strategy.	Noted.
	The Co-operative Group	No. Development should be more evenly spread across the Borough. Given the existing housing land supply deficit in the Borough, it is considered that the Direction for Growth has failed to accommodate the housing and employment growth required on Greenfield sites up to 2026.	Noted. Outline planning permission has been granted for the Direction for Growth.
	Define (on behalf of Bloor Homes Limited)	Future development should be directed to Oadby. The housing needs of Oadby's residents are not being met, particularly in respect of affordable housing.	Noted.
	Landmark Planning	Potentially, although other sites which are located closer to services and facilities are available	Noted.
	Mary Ray	Yes, because the area has already been identified for development and it will limit the need to spread development in other areas.	Noted.
	Environment Agency	Yes.	Noted.

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
<p>9. The Local Plan will need to set out how much land is required in order to reflect the number of jobs in the Borough, in particular jobs related to the business industry, commercial and warehousing sectors. Do you have any information that the Council should take into account in determining how much land should be provided for these uses?</p>	<p>Pegasus Group (on behalf of Barratt and David Wilson Homes)</p>	<p>It is important that the Council continues to review the need for additional employment land in the Borough and the relocation requirements of existing businesses.</p>	<p>The Council are currently undertaking evidence gathering in terms of employment land and the findings of these studies will inform policies related to employment.</p> <p>The need for additional employment land will be taken into account in preparing the Local Plan.</p>
	<p>The Co-operative Group</p>	<p>A supply side analysis has not been undertaken but Stoughton Grange comprises a mixed use, sustainable, rural location close to the main urban area.</p>	<p>Noted. The Council are currently undertaking evidence gathering in terms of employment capacity and the findings of these studies will inform policies related to employment land.</p>
<p>10. How do you think the Council should balance</p>	<p>Pegasus Group (on behalf of Barratt and David)</p>	<p>The Council needs to work with other HMA authorities to ensure that the full, objectively assessed needs of the Leicester and Leicestershire HMA are met, including potential</p>	<p>Local planning authorities in the HMA have mechanisms in place that enable joint working and</p>

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
<i>the small size of the Borough with meeting its development needs?</i>	Wilson Homes)	issues of unmet need arising from Leicester City or the period to 2036.	addressing such matters under the Duty to Co-operate
	The Co-operative Group	The Council should ensure proportionate, phased development in sustainable rural locations.	Noted.
	Define (on behalf of Bloor Homes Limited)	The Local Plan must ensure sufficient land comes forward to meet identified needs and ensure that everyone has the opportunity of a decent home through the identification and allocation of deliverable development sites.	Noted.
	Landmark Planning	The level of growth should be determined by objectively assessed housing need as this will reflect the size and socio-economic make up of the Borough.	Noted.
	Gladman Developments	The Council should meet its development needs in full to accord with the NPPF unless the adverse impacts significantly and demonstrably outweigh the benefits.	Noted.
	Mary Ray	Keep limits of development to a minimum.	Noted.
	Environment Agency	By considering the type of housing that is needed and maximising the housing density to the available land supply.	Noted.
<i>11. How do you think the Council should plan for Kilby Bridge, which is the only</i>	The Co-operative Group	Kilby Bridge should not be the sole focus for future rural development.	Noted.
	Historic England	Careful consideration should be given to the Grand Union	Noted.

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
<i>rural settlement in the Borough?</i>		Conservation Area to the south.	
	Environment Agency	Seek to preserve it as a unique resource in the Borough.	Noted.
	Mary Ray	Leave it as it is.	Noted.
12. The location of the Borough, adjacent to Leicester, means that there is a strong relationship between the two areas in terms of where people, live, work and access sporting and leisure facilities How do you think the Council should plan for this?	The Co-operative Group	The Council should ensure proportionate, phased development in sustainable rural locations. This includes the re-provision of improved facilities in the existing urban area via CIL and S106 from development of sites on the edge of the urban area. One such opportunity is to de-allocate the open space designation on land around Spire Hospital so that it can be re-accommodated to more sustainable locations in the inner urban area which are closer to existing university facilities.	Noted
	Define (on behalf of Bloor Homes Limited)	<p>Consider affordable housing needs. There is no evidence of any agreement between the authorities over this or that it is a matter of discussion under the Duty to Co-operate.</p> <p>The Borough should meet its own needs in accordance with the NPPF, a key principle of sustainable development and so as not to require residents to move away from their home area.</p> <p>Consider whether Leicester City Council can meet its own housing needs; the effect of this on affordable housing provision in the Borough; and, whether any shortfall in Leicester will need to be met in the Borough.</p>	Local planning authorities in the HMA have mechanisms in place that enable joint working and addressing such matters under the Duty to Co-operate
	Landmark	Consider the provision of new Greenfield sites to cater for the	Local planning authorities in the

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
	Planning	growth of Leicester.	HMA have mechanisms in place that enable joint working and addressing such matters under the Duty to Co-operate
	Gladman Developments	Given the proximity of the district to Leicester and the close interaction of the housing and labour markets between Leicester and Oadby and Wigston it is essential to understand whether Leicester can meet its full objective assessment of housing need. If not, which is likely, then Oadby and Wigston borough must seek to ensure that the unmet needs from Leicester are delivered within the Housing Market Area in line with paragraph47 of the framework.	Local planning authorities in the HMA have mechanisms in place that enable joint working and addressing such matters under the Duty to Co-operate.
	Mary Ray	There are enough sporting and leisure facilities in the Borough.	Noted.
	Environment Agency	Ensure that sustainable transport links are in place to facilitate easy movement of people.	Local planning authorities in the HMA have mechanisms in place that enable joint working and addressing such matters under the Duty to Co-operate
13. Are there any particular relationships between the Borough of Oadby and Wigston and the	Pegasus Group (on behalf of Barratt and David Wilson Homes)	<ul style="list-style-type: none"> • Cross Boundary issues relating to ‘unmet need’ • Cross Boundary issues between the city and county in relation to how affordable housing needs are met. 	Noted.
	Mary Ray	Keep the green spaces on the boundaries, such as Green Wedges, parks and sports grounds on the north west boundary	Noted.

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
<i>City of Leicester that you think the Council should be particularly aware of?</i>		along Saffron Road/Saffron Lane.	

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
Planning for Homes to meet the Needs of the Community			
<p>Questions 14-20 general comments (please see individual comments that follow for question text)</p>	<p>National Custom and Self Build Association</p>	<p>Reference is made to specific paragraphs in relevant Acts and Regulations as well as Ministerial Statement stating there is a clear statement that local planning authorities need to plan for those that wish to build their own home. Local planning authorities should take a proactive position to providing land and should undertake rigorous and effective evidence gathering to measure custom and self-build need in their districts.</p>	<p>The Council will be undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing. This will include measuring the demand for self-build in the Borough and how any needs determined can best be enabled within the Borough.</p>
	<p>HBF</p>	<p>Critical of the assumptions used in the calculation of the OAN set out in the current SHMA with the result that they believe the OAN to be underestimated and fails to take full account of longer term migration, unattributable population change, household formation rates, worsening market trend signals, affordable housing needs and no alignment of employment and economic growth trends. The SHMA also pre-dates publication of 2012 Sub National Household Projections.</p> <p>The Local Plan should allocate a range of sites by size and market location in order for house builders can offer the widest range of products.</p>	<p>The criticism of the current SHMA methodology is noted.</p> <p>The Council will be undertaking evidence gathering in terms of housing need at a strategic and local level. This new evidence study will supersede the current SHMA.</p> <p>The Local Plan will consider a variety of sites by size and location to determine the best options for</p>

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
		<p>It is recommended that the Council undertakes a whole plan viability assessment in order to justify policy requirements including affordable housing provision.</p>	<p>delivering the Borough's housing requirement.</p> <p>The recommendation to do a whole plan viability assessment is noted and will be given consideration in due course.</p>
	<p>Ziyad Thomas The Planning Bureau Ltd</p>	<p>Reference is made to the Framework and Planning Practice Guidance and other published guidance where they relate to housing for the elderly. Percentage of over 60 year olds in the Borough is projected to increase to 28.3% up to 2026. Respondent commends the Council for acknowledging the need to provide specialist older person accommodation in the Borough to meet diverse needs. Local Plan should acknowledge the role that owner-occupied sheltered housing schemes can play in meeting needs.</p>	<p>Noted</p>
<p>Questions 14-19 general comments (please see individual comments that follow for question text)</p>	<p>Pegasus Group</p>	<p>Consider the current Core Strategy figure of 20% affordable housing figure (10 dwellings or more) for Wigston is an appropriate benchmark to consider the further extension of the Direction for Growth.</p> <p>Further concerned that the Local Plan should not place undue onerous restrictions on new development that would affect delivery and that there should be a flexible approach to the mix</p>	<p>The Council will be undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing and in particular affordable housing. In particular, evidence will indicate whether current levels of affordable housing</p>

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
		of housing.	are still appropriate. Other comments noted.
Questions 14 and 15 (please see individual comments that follow for question text)	Define	<p>The Borough has acute levels of affordable housing need as evidenced by the Strategic Housing Market Assessment (SHMA) but these have only been addressed to date at very low levels. The SHMA does purport to uplift the objectively assessed need (OAN) to reflect acute affordable housing need but only meagrely. Current SHMA suggests that the Borough's affordable housing needs cannot be met because of viability considerations.</p> <p>Concern about the reliance in SHMA of the private rented sector in mitigating affordable housing provision, particularly where the SHMA notes the private rented sector provides less secure tenancies, standards may be lower and some specific needs may not be catered for. Fundamentally SHMA says private rented sector should not be treated as a form of affordable housing as reflected in SHMA Guidance and NPPF.</p> <p>Highlighted no formal relationship with Leicester City under Duty to Co-operate in terms of meeting affordable housing</p>	<p>The Council will be undertaking evidence gathering in terms of housing need at a strategic and local level that will replace the current SHMA and the findings of these studies will inform policies related to housing and in particular affordable housing. In particular, evidence will indicate whether current levels of affordable housing are still appropriate.</p> <p>Noted comments in relation to relationship with Leicester City and Duty to Co-operate. Fostering and relationships under the Duty to Co-operate are an ongoing element of local planning. How the Borough complies with the Duty to Co-operate will be detailed as part of the Local Plan preparation process.</p>

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
		needs as discussed during Cottage Farm appeal.	
Questions 16 to 18 (please see individual comments that follow for question text)	Define	With reference to several paragraphs in the NPPF and the Localism Act it is felt that the key aim of the Local Plan is to ensure a continual supply of both market and affordable housing and therefore, the true level of market and affordable housing need in the Borough needs to be identified and provided for in Local Plan policies. The Local Plan must ensure that sufficient land comes forward to meet identified needs etc.	As above.
14 What types of new housing are most needed in the Borough?	The Co-operative Estates	Market housing with proportionate level of starter homes is required to meet the needs of the Borough. Housing typology dependent on the physicality of a site and market demand. Includes reference to Stoughton Grange and Spire Hospital as potential residential development sites.	Noted, in particular promotion of Stoughton Grange and Spire Hospital as residential development sites.
	Lance Wiggins Landmark Planning	A range of affordable and market housing provision of older people and 'extra care' accommodation	Noted
	Phil Bamford Gladman Developments	A mix of housing types is needed across the Borough including specialist accommodation for first time buyers, students and the increasing elderly population.	The Council will be undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing. This should indicate the level of need for different groups such as first time buyers, students

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
			and the elderly.
	Lesley Thornton	Borough needs housing units for single people with a range of different ages, needs and incomes. Provision must also be made for the handicapped.	The Council will be undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing. This should indicate the level of need for different groups such as single people and those with disabilities. .
	Mary Ray & Tony Sumpter	Social housing owned by the LA of Housing Associations	Noted
15. What approach should the Local Plan take towards providing affordable housing?	The Co-operative Estates	Off-site contributions harnessed from greenfield site to be recycled into regenerating inner housing areas. Includes reference to Stoughton Grange and Spire Hospital as potential residential development sites.	Noted, in particular promotion of Stoughton Grange and Spire Hospital as residential development sites
	Lance Wiggins Landmark Planning	A combination of affordable housing secured as a proportion of major housing development sites and rural exceptions sites where appropriate. Increasing supply of all types of housing and meeting full, objectively assessed housing needs of the Borough.	Noted
	Phil Bamford Gladman	The full level of affordable housing need should be assessed through the SHMA and be factored in when the Council set their overall housing requirement. Further reference is made to	The Council will be undertaking evidence gathering in terms of housing need at a strategic and

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
	Developments	the provisions of the Framework in this respect.	local level. This new evidence will supersede the current SHMA but will assess the Borough's affordable housing need.
	Lesley Thornton	Plan must provide good evidence of the need for units for single people. Taller blocks should be acceptable where not over dominant, well designed and blend into the surroundings. Open space and wildlife corridors must be included in the plans.	The Council will be undertaking evidence gathering in terms of housing need at a strategic and local level as well as design and ecology and the findings of these studies will inform policies contained in the Local Plan.
	Mary Ray & Tony Sumpter	Build social housing. Stop selling social housing. Control private landlord property. Bring empty homes back into use.	Noted. Reference to selling social housing and controlling private landlord property is outside the purview of the Local Plan.
16. How should the Local Plan meet affordable housing needs given the specific and unique nature of the Borough in this context?	The Co-operative Estates	As per answer to Question 15.	Noted
	Lance Wiggins Landmark Planning	The SHMA details the affordable housing need in the Borough is high. Reliance on private rented provision to meet needs is not appropriate as rent controls do not apply to private landlords in the same way as socially registered providers.	The Council will be undertaking evidence gathering in terms of housing need at a strategic and local level. This new evidence will supersede the current SHMA but will assess the Borough's affordable housing need and ways

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
			of meeting it.
	Phil Bamford Gladman Developments	None	Noted
	Lesley Thornton	Continue to allocate brown field land for affordable housing and use every available means to increase the Council's housing stock such as taller buildings (as per previous answer). Should be sympathetic design, green spaces and wildlife corridors.	The Council will be undertaking evidence gathering in terms of housing need at a strategic and local level as well as design and ecology and the findings of these studies will inform policies contained in the Local Plan
	Mary Ray & Tony Sumpter	Stop pretending private rented housing is affordable – least of all when the costs are covered by housing benefit – so the Council is paying for the landlords profits.	The Council will be undertaking evidence gathering in terms of housing need at a strategic and local level. This new evidence will supersede the current SHMA but will assess the Borough's affordable housing need and ways of meeting it.
17. How can the Local Plan assist in the Government's	The Co-operative Estates	As above and ensuring future new homes are located in sustainable rural locations close to the main urban areas, which already provide employment and service uses. Includes reference to Stoughton Grange and Spire Hospital as potential	Noted.

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
<i>aspiration to increase home ownership?</i>		residential development sites.	
	Lance Wiggins Landmark Planning	By encouraging the provision of a wide choice of high quality homes as per the Framework, including shared ownership provision.	Noted
	Phil Bamford Gladman Developments	By providing for the full objectively assessed needs for housing and a range of market and affordable housing to buy rather than concentrating on housing for rent.	The Council will be undertaking evidence gathering in terms of housing need at a strategic and local level. This new evidence will supersede the current SHMA but will assess the Borough's affordable housing need and ways of meeting it.
	Lesley Thornton	By insisting on larger numbers of affordable homes within the Borough.	Noted.
	Mary Ray & Tony Sumpter	It can't. The Government's aspiration is a mirage predicated on 'affordable' = £250k outside London	Noted
<i>18. How should the Local Plan seek to maximise the amount of new affordable homes built in the Borough in the</i>	The Co-operative Estates	As above and ensuring future new homes are located in sustainable rural locations close to the main urban areas, which already provide employment and service uses. Includes reference to Stoughton Grange and Spire Hospital as potential residential development sites.	Noted.
	Lance Wiggins	A combination of affordable housing secured as a proportion of major housing development sites and rural exceptions sites	Noted

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
<i>future?</i>	Landmark Planning	where appropriate. Increasing supply of all types of housing and meeting full, objectively assessed housing needs of the Borough.	
	Phil Bamford Gladman Developments	None	Noted
	Lesley Thornton	Provide good strong evidence of need.	The Council will be undertaking evidence gathering in terms of housing need at a strategic and local level. This new evidence will supersede the current SHMA but will assess the Borough's affordable housing need and ways of meeting it.
	Mary Ray & Tony Sumpter	Build Council housing, control private rents. Use maximum powers re private landlords and property standards and bringing empty homes back into use. Minimise student accommodation in the Borough, its already dominating all building and conversion work in the City and this may spread into the Borough.	Reference to controlling private landlord property is outside the purview of the Local Plan. The Council will be undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing. This should indicate the level of need for different groups

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
			such as students.
19. Given the small size of the Borough, and its predominantly urban nature that directly adjoins the countryside surrounding the urban area of Leicester, how can the Local Plan meet all of these differing needs?	The Co-operative Estates	None	None
	Lance Wiggins Landmark Planning	A combination of affordable housing secured as a proportion of major housing development sites and rural exceptions sites where appropriate. Increasing supply of all types of housing and meeting full, objectively assessed housing needs of the Borough.	Noted
	Phil Bamford Gladman Developments	None	Noted
	Lesley Thornton	The Plan must be strong on evidence of need and insistent on good imaginative design. Taller well designed buildings will help fulfil the need.	Noted.
	Mary Ray & Tony Sumpter	Can't be done.	Noted
20. What matters should such a criteria take into account?	The Co-operative Estates	None	None
	Pegasus Group	No comment.	Noted
	Lance Wiggins Landmark	No comment	Noted

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
	Planning		
	Phil Bamford Gladman Developments	None	Noted
	Lesley Thornton	The needs of both the travellers and of the existing community.	Noted.
	Mary Ray & Tony Sumpter	The interests are at variance.	Noted.
Section 1.6 General comments	Historic England	In relation to site allocations, Historic England would welcome the opportunity for early involvement in any site allocations which may be proposed.	Noted.

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
Planning for the Local Economy and Employment Land			
<p>Question 21-23 General Comments <i>(please see individual comments that follow for question text)</i></p>	<p>Mike Stone The Co-operative</p>	<p>Stoughton Grange as a sustainable, mixed use location for rural enterprise and start-up businesses, supported by proportionate residential development and land around Sprite Hospital to provide a range of housing market needs, including starter homes for key workers such as nurses.</p>	<p>Note the promotion of Stoughton Grange as a location for rural enterprise and start-up businesses. This location will be tested for its appropriateness for this use as part of the preparation of the Local Plan.</p>
<p>Question 21-26 General Comments <i>(please see individual comments that follow for question text)</i></p>	<p>Pegasus Group</p>	<p>As part of the proposals for the Direction for Growth there is provision for an additional 2.5 hectares of employment land. It is considered that this represents an appropriate level of provision. The Council needs to keep under review the need for additional employment land and provide the flexibility to allow land no longer required for employment uses to be developed for other purposes.</p>	<p>The Council will be undertaking evidence gathering in terms of employment land at a strategic and local level and the findings of these studies will inform policies related to the local economy and employment land. In particular, evidence will indicate whether more or less land is required for employment uses and the most appropriate locations for employment land.</p>
	<p>Paul Tame NFU</p>	<p>New farm buildings needed by the business. This could be for regulatory reasons (e.g. new slurry stores) or because new or</p>	<p>Noted. The Local Plan will include policies in relation to what kinds of development are appropriate in</p>

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
		<p>more crops and livestock are being farmed.</p> <p>Conversion of vernacular buildings on farms into new business use or residential use. This enables parts of older buildings to be preserved whilst helping the economy and the farm business.</p>	<p>rural/countryside areas. The needs of agricultural businesses will fall within this type of policy. In terms of residential redevelopment, this will also be considered in relevant housing delivery policies.</p>
<p>21. How and where should the Local Plan meet the existing and new employment needs of the Borough?</p>	<p>Phil Bamford Gladman Developments</p>	<p>There should be an up to date Functional Economic Market Assessment. The current 2008 Leicester and Leicestershire Housing Market Area Employment Land Study which was updated in 2013 is now out of date. The Employment Land Study should be updated during the Local Plan preparation process to ensure that the jobs targets are still appropriate and robust.</p>	<p>The Council will be undertaking evidence gathering in terms of employment land at a strategic and local level and the findings of these up to date studies will inform policies related to the local economy and employment land.</p>
	<p>Mary Ray and Tony Sumpter</p>	<p>Number of sites in Borough with older unused or underused commercial and industrial sites. Should be the first port of call for conversion to housing. Failing that, they should be broken into small units to facilitate small business use.</p>	<p>The Council will be undertaking evidence gathering in terms of employment land at a strategic and local level and the findings of these studies will inform policies related to the local economy and employment land. In particular, evidence will indicate whether more or less land is required for employment uses and the most appropriate locations for</p>

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
			employment land.
<p>22. Are there any particular businesses or commercial activities in the Borough that we should develop specific policy support for?</p>	<p>Mary Ray and Tony Sumpter</p>	<p>Shouldn't support yet more fast food outlets. Should be available for small businesses such as computer services, small office services e.g. accountants etc</p> <p>Encourage start up businesses and pop up shops.</p>	<p>Noted</p>
<p>23. How should we balance the competing needs of the employment areas in the Borough, between retaining land and buildings providing land for the business industry, commercial and distribution</p>	<p>Mary Ray and Tony Sumpter</p>	<p>Allow new community uses for larger manufacturing sites, conversion to housing and/or small affordable start up units.</p> <p>Make sure Railway Triangle definitely doesn't have designation for employment use.</p>	<p>Noted</p>

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
<i>sectors and allowing new community orientated uses?</i>			
24. How can the Local Plan improve the quality of the existing employment areas?	Mary Ray and Tony Sumpter	More trees and encourage high level of building and design quality.	The Council are currently undertaking evidence gathering in terms of sustainable design and the findings of this study will inform relevant policies.
25. Should the Local Plan respond to the fact that half of people who live in the Borough work elsewhere?	Phil Bamford Gladman Developments	The Local Plan should provided sufficient employment land to meet the needs of the borough. However, it would be extremely difficult, given the location of the Borough, to significantly address the issue of out-commuting.	The Council will be undertaking evidence gathering in terms of employment land at a strategic and local level and the findings of these up to date studies will inform policies related to the local economy and employment land. It is agreed that out-commuting is a challenge in the Borough that the Local Plan will see to try and address.
	Mary Ray and Tony Sumpter	No. That's choice and availability of varied job opportunities. The Borough should make a lot more of its station.	Noted.

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
<p>26. How can the Local Plan attract inward investment, for example from sectors such as the food, construction and distribution sectors?</p>	<p>Mary Ray and Tony Sumpter</p>	<p>Brooks has closed. Jacobs may well do. Distribution would be a nightmare. So would construction. The roads can't cope.</p>	<p>Noted</p>

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
Town and Local Centres and Regeneration			
27. What types of new development do you think should be provided in the centres of Oadby, Wigston and South Wigston?	Mary Ray and Tony Sumpter	There should be improved toilet facilities in all of the town centres.	Noted.
	Leslie Thornton	No development.	Noted.
28. What are the individual characteristics of each centre that should be protected and enhanced?	Oadby Trinity Methodist Church	Car parking within the town centres should be protected and enhanced. The close relationship of parking and the shops on The Parade is very important particularly East Street car park.	Current planning policy set out in the Town Centres Area Action Plan suggests a no net loss of car parking throughout each of the town centres.
	Leslie Thornton	The Victorian aspect of South Wigston should be enhanced, 'give it some character'.	The new Local Plan will have specific policies that seek to retain important historic character areas of the Borough.
	Mary Ray and Tony Sumpter	There should be more trees located within the town centres.	Noted.
29. Is there anything in relation to the town, district and	Mary Ray and Tony Sumpter	The Tesco store should not be within South Wigston as it detracts from the character of the area.	This comment is not relevant to the Local Plan consultation.

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
<i>local centres that the Local Plan should seek to change, particularly to respond to the changes in the way people buy products and services?</i>			
30. How can we ensure that local centres remain successful and continue to fulfil their purpose at a local level?	Oadby Trinity Methodist Church	The current number and location of car parking spaces within Oadby town centre needs retaining.	Current planning policy set out in the Town Centres Area Action Plan suggests a no net loss of car parking throughout each of the town centres.
	Leslie Thornton	A large range of shops should be encouraged.	Through the new Local Plan evidence gathering process a Retail Capacity study will be undertaken. The study will provide valuable evidence regarding the demand for the number of retail units and their sizes.
	Mary Ray and Tony Sumpter	The current Town Centre Manager post is clearly not working. A local person who lives in the Borough should be employed as the Town Centre Manager.	This comment is not relevant to the Local Plan consultation.

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
<p>31. What improvements can be made to make access to the centres by foot, bicycle and bus easier?</p>	<p>Leslie Thornton</p>	<p>Pedestrians should have priority over traffic.</p>	<p>The Council currently has a number of policy documents that encourages high quality public realm as well as the prioritising of pedestrians over the motor vehicle, for example the Public Realm SPD and the Town Centres Area Action Plan. The Council will look to further encourage this through policies set out in the new Local Plan.</p>
	<p>Mary Ray and Tony Sumpter</p>	<p>There should be more cycle lanes within the Borough; there should be more pedestrian crossings; and a 20mph maximum speed should be implemented across all of the town centres within the Borough.</p>	<p>All of the matters mentioned could possibly be encouraged through local planning policy, however they are related to highway infrastructure which is the ownership of Leicestershire County Council.</p>
<p>32. What are your views with regard to car parking in the centres?</p>	<p>Oadby Trinity Methodist Church</p>	<p>Existing car parking in Oadby town centre should be retained. East Street car park provides the best access to the shops on The Parade. Sandhurst Street car park does not provide the same level of access and the proposal for a decked car park on this site is flawed. There should be no reduction in car parking spaces within the town centre even in the short term.</p>	<p>Current planning policy set out in the Town Centres Area Action Plan suggests a no net loss of car parking throughout each of the town centres. This policy could well be brought forward through the new Local Plan process.</p>

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
			The Council would ensure that any development that took place impacting car park land would have minimal effect in the short term on car parking numbers.
	Leslie Thornton	Public car parking should be kept free, however better signage is needed.	The comment re car parking is not relevant to the Local Plan consultation. There is an adopted Public Realm Strategy that covers signage.
	Mary Ray and Tony Sumpter	The Council should be charging a nominal rate for public car parking, for example Blaby District Council charge 20 pence for 3 hours parking and it works very well.	This comment is not relevant to the Local Plan consultation.
32. What are your views with regard to car parking in the centres?	Pegasus	Believes the Direction for Growth are supporting Wigston town centre is still the most appropriate strategy. Further development within the Wigston Direction for Growth area will further support and strengthen this. Further development of the Direction for Growth area would provide scope for supporting the development of community facilities and possibly a new local centre.	Noted.
	Leslie Thornton	South Wigston town centre should retain its Victorian character.	The Council would seek to protect and enhance local historic character through appropriate

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
	Mary Ray and Tony Sumpter	The wide pavement of South Wigston should have more street furniture, including seats and planters...improvement to South Wigston town centre is needed.	planning policy. Current and future planning policy (will) seek the improvement of all areas of public realm within the Borough and specify the sorts of materials and products that are appropriate. If any works were to take place as suggested, external funding and investment would need to be sought.
General Town Centre Comments	Leicestershire County Council	They support the aspiration to improve the town centres and ensure that accessible services are located within the Borough.	Noted.
	Historic England	Opportunities to protect and enhance conservation areas is strongly encouraged. There are a number of conservation areas within or near to town centres and these should be retained.	Similar to current planning policy, future planning policy would seek to protect and enhance conservation areas situated within the Borough.

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
Infrastructure, Transport and Accessibility			
34. How can the Local Plan increase walking, cycling and the use of public transport in the Borough?	Members of the Public (Mary Ray and Tony Sumpter)	Sustainable options for transport and movement can be increased by improving rights of way and cycle lanes; greater promotion and frequency of South Wigston's railways station and the services that link to Leicester and Birmingham; Encourage the local population to make short journeys more sustainably through the promotion of walking and cycling; Retain and enhance green spaces and trees throughout the Borough; and, put traffic calming measures in town centres to reduce speed of traffic and to give priority to the pedestrians by increasing safety.	Noted.
	Pegasus Group On behalf of: Barratt and David Wilson Homes	The Direction for Growth (DFG) is well located in relation to Wigston Town Centre and other local facilities. The DFG includes a range of measures to encourage sustainable modes of transport.	Noted.
	Sport England	Support the intention of this question and provide design guidance on how to encourage active lifestyles into new developments.	Noted.
35. Are there any particular items of infrastructure or community	AECOM	It is welcomed that the new Local Plan will seek to consider what, where and how infrastructure in the Borough can be improved to help facilitate sustainable development and growth.	Noted.

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
<p><i>facilities that you consider will be required in order to support new development in the future?</i></p>	<p>On behalf of: Highways England</p>	<p>Highways England is keen to ensure that the cumulative impact of growth over the plan period upon the M1 in Leicestershire, particularly upon J21, is to be considered and mitigated through the preparation of carefully prepared evidence base to support each district's emerging Local Plan.</p>	
	<p>Members of the Public (Mary Ray and Tony Sumpter)</p>	<p>Cycle lanes and more pedestrian crossings in town centres.</p>	<p>Noted.</p>
	<p>Sport England</p>	<p>Sports facilities should be considered in the emerging Local Plan.</p>	<p>Noted.</p>
	<p>Theatres Trust</p>	<p>The National Planning Policy Framework (NPPF) encourages local plans to include provision of health, security, community and cultural infrastructure, as well as to guard against unnecessary loss of valued facilities. This should be promoted in the new Local Plan document.</p> <p>Community and cultural facilities should therefore be protected and enhanced in the Borough and the Council should therefore consider including a policy incorporating this approach. For</p>	<p>Noted.</p> <p>The suggested wording will be taken into consideration when drafting the new Local Plan document.</p>

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
		clarity, a definitive explanation of the term 'community and cultural facilities' should be included in the glossary of terms.	
	Member of Public (Lesley Thornton)	Improved bus services and infrastructure to improve sustainable modes of transport throughout the Borough should be a key objective for the new Local Plan.	Noted.
	Mono Consultants Ltd On behalf of: The Mobile Operators Association	Encourages that the Local Plan should incorporate and embrace the importance of planning for telecommunications, in line with guidance included within the NPPF (paragraph 42). Suggested wording for a policy and an introductory paragraph based on telecommunication development, including a criteria against which development proposals can be assessed, has been included in the response.	Noted. The suggested wording will be taken into consideration when drafting the new Local Plan document.
	Pegasus Group On behalf of: Barratt and David Wilson Homes	As part of the further expansion of the Direction for Growth site, there is the opportunity to provide new green infrastructure in association with this development.	Noted.
	Leicester City	We would expect the need for new facilities and infrastructure,	Noted

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
	Council	such as schools and healthcare facilities that would be required as a result of new growth to be planned for and provided within the borough to avoid pressure on existing facilities in the city.	
36. How can the Local Plan ensure that the necessary amount of new development is provided in the Borough, whilst minimising the amount of congestion on the roads within and adjoining the Borough?	Members of the Public (Mary Ray and Tony Sumpter)	Congestion throughout the Borough is already a real issue and it is only set to increase in the future. Therefore, working in partnership with the Highways Authority, the Council should look to address this issue in the new Local Plan.	Noted.
	Pegasus Group On behalf of: Barratt and David Wilson Homes	There is scope for further growth of the Direction for Growth (DFG) to the south-east of Wigston to provide a range of local facilities encouraging sustainable modes of transport. There is also the potential for a new link road between Newton Lane and Welford Road that would help to ease congestion at the Newton Lane / Welford Road junction.	Noted.
37. Do you have any view on how the Council should seek financial contributions from developers	Gladman Developments	Financial contributions sought from developers should not be set at a level that cumulatively places the viability of Plan delivery at risk.	Noted.
	Highways Authority	Supportive of a cumulative impact approach with regards to assessing ongoing transport infrastructure requirements.	Noted.

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
<p><i>to pay for new infrastructure?</i></p>	<p>(Leicestershire County Council)</p>	<p>We support aspirations to increase sustainable travel in and around the Borough, and would encourage working with partners such as local bus operators to promote key commercial links to Leicester City Centre.</p>	<p>The Council will seek to engage with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take place.</p> <p>As yet however, the Council does not have a CIL and therefore, financial contributions to be sought in the Borough are limited and bound by the restrictions placed upon the agreement of S.106 or other mechanisms for seeking financial contributions toward highways infrastructure.</p>
		<p>Severe funding shortages for the Highways Authority will mean that it is unlikely that Leicestershire County Council will be able to provide direct funding for at least the early to middle part of the plan period.</p> <p>Therefore, the Local Plan will need to consider how new infrastructure for highways and sustainable travel can be</p>	<p>Noted.</p> <p>The Council is aware of the extreme shortages in funding for infrastructure. We are committed to seeking to deliver the most sustainable developments and as</p>

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
		funded.	<p>part of that decision process; we must seek to investigate by engaging with all partners to seek innovative ways of ensuring that the necessary infrastructure to support growth is in place.</p> <p>The Council does not yet have a Community Infrastructure Levy (CIL) Charging Schedule, but will review its position on this in due course.</p> <p>However, CIL is very unlikely to plug the infrastructure funding gap for any authority and therefore, other mechanisms and funding streams will become increasingly important.</p>
	Sport England	The Council should consider the merits of pursuing Community Infrastructure Levy (CIL) in the Borough. Section 106 and an evidenced Infrastructure Delivery Plan (IDP) are also key pieces of robust evidence.	<p>Noted.</p> <p>Based upon the existing viability assessment of our position, the</p>

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
			<p>Council does not deem CIL to be a cost-effective mechanism to secure infrastructure contributions in this Borough.</p> <p>However, the Council is committed to regularly reviewing its position and should CIL be deemed more viable in the future, the Council will act accordingly on the matter.</p> <p>The Council is also in the process of updating its position in relation seeking planning obligations via S.106.</p> <p>The Council also intends to update its existing Local Infrastructure Plan (2012) by developing an Infrastructure Delivery Plan (IDP) as supporting evidence base for the emerging Local Plan.</p>

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
	Theatres Trust	The Council is proposing not to pursue Community Infrastructure Levy (CIL), but instead continue to seek S106. The Council should reconsider its position with a view to examining the impact that the pooling restrictions will place upon its ability to deliver infrastructure post April 2015.	<p>Noted.</p> <p>Based upon the existing viability assessment of our position, the Council does not deem CIL to be a cost-effective mechanism to secure infrastructure contributions in this Borough.</p> <p>However, the Council is committed to regularly reviewing its position and should CIL be deemed more viable in the future, the Council will act accordingly on the matter.</p>
38. Should the Local Plan seek to make provision for burial facilities in the Borough?	Member of Public (Lesley Thornton)	Should a suitable site within the Borough be available, then new burial facilities should be sought.	Noted.
	Members of the Public (Mary Ray and	No. The existing facilities in Leicester City and the new crematorium at Countesthorpe (Blaby District) provide	Noted.

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
	Tony Sumpter)	sufficient capacity.	
	The Co-operative Group	<p>Land to the south of Stoughton Road is already allocated for a cemetery in the Council's adopted Development Plan and The Co-operative Group (TCG) would like that allocation to be carried forward into the next plan period.</p> <p>In light of the highlighted demand for this type of facility in South Leicestershire, TCG would favour a larger allocation for both formal cemetery provision and a woodland burial site.</p>	<p>Noted.</p> <p>The Council will review all existing designations, including Cemetery designations that are incorporated within Green Wedges, as part of the emerging Local Plan.</p>

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
Delivering High Quality Places – Design, Landscape Character and Heritage			
39. How can the Local Plan encourage high quality design of new development?	Leslie Thornton	The Council should insist on high quality design which fits with the existing environment or should encourage new radical design in areas where this will not be incongruous. New and replacement planting must be an essential requirement in all new development.	The new Local Plan will contain development management policies that seek the use of high quality design and use of materials.
	Mary Ray and Tony Sumpter	Powers of the local authority should be maximised to protect the trees in the Borough. Tree Preservation Orders should be used to protect existing trees; landscaping conditions on approved plans for tree and landscape planting should be used. Detailed Arboricultural Methods Statements should be required. The Council should ensure that a detailed and robust Tree Supplementary Planning Document is in place. The Council should require planting proposals for all new development to actively consider policies and evidence; Landscape Character Assessment; Biodiversity Audit (currently incomplete); Green Infrastructure Plan (currently incomplete); Nature Conservation Strategy (currently incomplete); Open Space, Sport and Recreation policy (currently incomplete); and Greening the Borough policy.	Noted. Through the production process of the new Local Plan all relevant key evidence base will be reviewed and updated where necessary.
40. What are the main characteristics of the Borough, or particular parts of the Borough, that	Leslie Thornton	Do not approve new housing estates with bog standard design, for example the Jelson development to the rear of the Council Offices in Wigston.	Through policies set out in the new Local Plan the Council will require high quality design and use of materials in all new development.
	Mary Ray and	In areas which are heavily treed with large gardens; that	Planning policy cannot restrict the

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
<i>the design, type, layout and location of new development should take into account?</i>	Tony Sumpter	character should be actively protected by a policy statement that precludes new development through the sell off of those gardens. The Landscape Character Assessment is a strong policy document. The Council should ensure that the new Local Green Space designation has been used to maximum effect throughout the Borough. The Local Plan should identify areas that are completely off limits to development.	sale of land, however it can restrict the uses of land. The Council will shortly be undertaking consultation regarding teh nomination of sites to be allocated as Local Green Space.
<i>41. How can the Council balance the need for high quality design and viability?</i>	DEFINE	There should be an aspiration in the Local Plan to ensure high quality design, however it should not detrimentally affect development viability. All developments that are proposed within or through the Local Plan should be viable.	It is not envisaged that the new Local Plan will propose new development. The Plan will allocate land for development. Development proposals will come forward through development drivers such as masterplans and Local Development Orders.
	Gladman	The Local Plan should avoid setting local standards that are not required by the National Planning Policy Framework. Doing so could jeopardise the viability of schemes. The Deregulation Bill 2015 specifies that council's cannot set any additional local technical standards relating to construction, internal layout or performance of new dwellings other than nationally described space standards. Optional requirement for water usage and adaptable / accessible dwellings can be set locally where evidence suggests that it is needed and viable.	It is not envisaged that the new Local Plan will set local standards relating to construction, internal layout or performance; this will be sought through standards set out within the nationally prescribed Building Regulations.

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
	Leslie Thornton	The Council should insist on high quality design.	Through policies set out in the new Local Plan the Council will require high quality design and use of materials in all new development.
	Mary Ray and Tony Sumpter	The Council should challenge developers use of viability or sustainability assessments so that they cannot get out of contributions for example S106 and affordable housing.	This comment is not relevant to the Local Plan consultation.
42. Are there any design issues or concepts that should receive particular consideration in the Local Plan?	Leslie Thornton	New radical design types and building materials should be encouraged in areas of new build. If possible built in energy producing systems should be promoted, for example solar panels on roofs.	Through policies set out in the new Local Plan the Council will require high quality design and use of materials in all new development. The Council will also require/encourage sustainable design and building methods as well as the use of methods to reduce waste and energy consumption where evidence supports this.
	Mary Ray and Tony Sumpter	The loss of natural open space and mature trees cannot be mitigated by provision somewhere else, these cannot just be replaced.	Noted.
43. Do you think	Mary Ray and	Yes the Saffron Road area should become a conservation	Through the production of the new

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
<i>that the Council needs to consider designating new, or making amendments to existing Conservation Areas?</i>	Tony Sumpter	area.	Local Plan evidence will be gathered relating to existing conservation areas and the possibility of creating additional conservation areas where relevant.
<i>44. Do you think that the Council needs to consider designating new, or making amendments to the existing list of Significant Local Buildings?</i>	Mary Ray and Tony Sumpter	Fencing should be removed that now surrounds The Cottage on Saffron Road. The Council should stop the erection of fences and removal of hedges.	This comment is not relevant to the Local Plan consultation.
<i>45. How can we best ensure that new development responds appropriately and effectively to the character and appearance of its</i>	Co-op	The Co-op are progressing options for future development at Stoughton Grange. The options will deliver sustainable development that assimilates with the historical landscape and visual character as well as the opportunity to meet the wider needs of the Borough.	Noted.
	Pegasus	The Direction for Growth will provide a high quality new development; current masterplan proposals take account of the local context and have been publicly consulted on.	Noted

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
<i>surroundings?</i>	Leslie Thornton	Supplementary planning guidance must insist on this.	Noted.
	Mary Ray and Tony Sumpter	The Council should act more effectively to block new development when it is a threat to the established character of the area.	The Council assesses every planning application on its own merit and the Council will ensure that development complies with both nationally set and locally set planning policy.
General Delivering High Quality Places	Leicestershire County Council	The Local Plan should refer to the 6 C's Design Guide when promoting high quality design and viable highway development.	Noted.
	Historic England	Reference within the Local Plan to conserving and enhancing the built, natural and historic environment is welcomed. There should however be a reference to protecting heritage assets and non designated assets. Heritage Assets relate to the National Planning Policy Framework Glossary.	Noted.

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
Planning for the Natural Environment, Play and Open Space and Green Spaces			
46. Which areas of the Borough should the Local Plan seek to protect – and why?	Environment Agency	Areas of floodplain and river corridors. Floodplains are areas that are prone to inundation with water at times and therefore may not be appropriate for development. The Environment Agency would support the Borough Council in efforts to reinstate areas of floodplain. River corridors should be protected because they provide important areas for recreation, biodiversity and species highways.	Noted. The Council's recent Strategic Flood Risk Assessment will aid the protection of areas at risk from flooding.
	Landmark Planning	<p>The Local Plan should seek to protect areas of important character and the edge of respective settlements in the Borough where these play an important role in protecting the character of the countryside.</p> <p>Whilst it is recognised Green Wedges have a role to play, their wholesale protection without further review, would be contrary to good planning.</p>	<p>Noted.</p> <p>The Council will review all existing designations, including Green Wedges, as part of the emerging Local Plan.</p>
	<p>Members of the Public</p> <p>(Mary Ray and</p>	<p>All existing areas of natural open space; parks and recreational space; Green Wedges; and, Green Infrastructure Corridors. The Council should do all that it can to protect treescape and limit the amount of new development.</p>	Noted.

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
	Tony Sumpter)		
	Sport England	Protect and enhance existing playing fields and sporting facilities. Also, provide new facilities should evidence base support such delivery.	Noted.
47. In this context, how should the Local Plan seek to protect and enhance the natural and local environment assets in the Borough?	Environment Agency	By having policies that restrict development in these areas and promote the use of river corridors for recreation and promoting biodiversity value.	Noted.
	Landmark Planning	The necessary development in the Borough to cater for arising need should be carefully planned through selective release of Green Wedge or countryside land. There are areas of countryside beyond the limits of the existing built up area that can be protected as natural assets without preventing proportionate growth.	Noted.
	Members of the Public (Mary Ray and Tony Sumpter)	Enhance designated network of Green Infrastructure Corridors through the inclusion of large areas of natural open spaces alongside roads with mature trees. Also, try to implement policies to protect large gardens, hedgerows and front gardens being replaced with hard standing driveways.	Noted.

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
		Enhance protection of natural assets and seek to develop a Tree Strategy; designate new Local Green Spaces; update evidence based documents including the Green Infrastructure Plan; Biodiversity Audit; and, the Landscape Character Strategy.	
	Sport England	<p>Robust evidence in line with national policy is required. Sport England's Playing Pitch Strategy (PPS) methodology can also be used.</p> <p>The Council must publish and adopt its PPS and all evidence base documents should be in line with the objectives of the NPPF, paragraphs 70, 73 and 74.</p>	Noted.
48. How should the Local Plan respond to the Green Infrastructure that exists in the Borough?	Environment Agency	Seek to protect Green Infrastructure in new policies.	Noted.
	Landmark Planning	The Local Plan should protect the best areas of green infrastructure (GI), but also, the Plan should be selective in its protection and as necessary, incorporate new, more accessible GI into new, well designed developments, that mature over time.	Noted.
	Members of the Public	Keep and enhance all Green Infrastructure designation (existing and new) in the Borough.	Noted.

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
	(Mary Ray and Tony Sumpter)		
49. How should the Local Plan balance the intrinsic character and beauty of the countryside with the benefits that can be created by new development?	Gladman Developments	<p>The Local Plan should have regard for paragraphs 109-113 of the NPPF. The Borough Council should create criteria based policies for assessing development and should have a hierarchy of international, national and locally designated sites, so that protection is commensurate with their status. Council's will be able to fully assess whether the adverse impacts of the loss of such areas significantly and demonstrably outweigh the benefits of delivering the full need of housing.</p> <p>Designations of local green space must follow this approach and should not cover extensive tracts of land and should be in close proximity to the community they serve.</p>	Noted. The Council will be undertaking evidence gathering in terms of green infrastructure and local green space and the findings of these studies will inform relevant policies in the Local Plan.
	Define On behalf of: Bloor Homes Ltd	<p>The National Planning Policy Framework (NPPF) now requires local plans to “recognise” the intrinsic character and beauty of the countryside, but it is no longer subject to a blanket protection from development where identified needs exist. Therefore, the critical issue is the need to consider appropriate selection of Greenfield sites where harm can be minimised by effectively mitigating impact through design.</p>	Noted.
	Landmark	The balance can be met by securing new GI habitat through	Noted.

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
	Planning	the creation of new landscapes as part of new development.	
50. How should the Local Plan maintain the quantity and quality of open space, sports and recreation facilities in the light of the continued growth of the Borough?	Landmark Planning	The Local Plan should promote selective protection of the Borough's best open space, sport and recreation, but be open to the possibility that some areas are less suitable or of poorer quality and therefore, new developments can also incorporate new, purpose-built facilities. Funding for such facilities can also be secured through mechanisms such as Section 106 contributions or Community Infrastructure Levy.	Noted.
	The Co-operative Group	There is an opportunity to de-allocate land around the Spire Hospital on Gartree Road, Oadby. The open space could usefully be re-accommodated to more sustainable locations in the inner urban area.	Noted. The Council will review all existing designations, including Green Wedges, as part of the emerging Local Plan.
51. How can the Local Plan ensure that the purpose and objectives of green wedges marries with the continued growth of the Borough?	Gladman Developments	It is unlikely that Green Wedges will meet the tests of the Framework. Gladman do not support the Green Wedge policy and suggest it should be removed from the new Local Plan because it prevents the Council from granting permission of otherwise sustainable locations to deliver full objectively assessed housing need.	Noted.
	Landmark Planning	To enable sustainable expansion of the Borough, careful management and selective releases or modifications to existing Green Wedge designations may be necessary to allow	Noted.

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
		for proportionate growth of the Borough harming the overall character. For example, sites at Sutton Close, Oadby and Wigston Road, Oadby would be good examples of how the Green Wedge boundary could be amended to release land to accommodate growth.	
	The Co-operative Group	Stoughton Grange to the north of Gartree Road is designated as a Green Wedge, yet it does not accurately perform as such and can therefore accommodate development subject to the necessary Land and Visual Impact Assessment (LVIA) and co-operation of the Council.	Noted. The Council will review all existing designations, including Green Wedges, as part of the emerging Local Plan.
	The Co-operative Group	Land to the south of Stoughton Road is already allocated for a cemetery in the Council's adopted Development Plan and The Co-operative Group (TCG) would like that allocation to be carried forward into the next plan period. In light of the highlighted demand for this type of facility in South Leicestershire, TCG would favour a larger allocation for both formal cemetery provision and a woodland burial site.	Noted. The Council will review all existing designations, including Cemetery designations that are incorporated within Green Wedges, as part of the emerging Local Plan.
	The Co-operative Group	On the basis that the new Plan is largely replicating the Core Strategy (2010) and in absence of allocating The Co-operative Group's (TCG's) land at Stoughton Grange and around the	Noted.

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
		<p>Spire Hospital, TCG objects to the Plan as drafted.</p> <p>As such, the Plan is not positively prepared, justified or consistent with national policy; and it is therefore unsound as drafted.</p>	<p>The Key Challenges (Regulation 18) Consultation Document does not allocate any sites and its sole purpose is to ask a series of questions in order to identify the 'key challenges' that the Borough must seek to tackle over the plan period up to 2031 and 2036.</p>
<p>52. Are there any particular green areas that are of particular importance to you or your community? Why do you consider that these areas should be given special protection?</p>	<p>Members of the Public</p> <p>(Mary Ray and Tony Sumpter)</p>	<p>Designate Saffron Road as a Green Infrastructure Corridor, including land at Tigers Road and Saffron Road. This corridor should also be enhanced with additional tree planting.</p> <p>Protect natural open space through designating Local Green Spaces in various locations in South Wigston. These areas are listed as specifically: Marstown Avenue; Crete Avenue; copse and green at west end of Namur Road and Ladysmith Road.</p> <p>Create a new policy to protect large gardens and trees from the threat of new development.</p> <p>We don't know the rest of the Borough well enough, but there must be similar areas in other parts of the Borough.</p>	<p>Noted. The Council will be undertaking evidence gathering in terms of green infrastructure and local green space and the findings of these studies will inform relevant policies in the Local Plan.</p>

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	<p>Pegasus Group</p> <p>On behalf of: Barratt and David Wilson Homes</p>	<p>The Direction for Growth and the potential further expansion area to the south-east of Wigston would not affect the two existing Green Wedges in the Borough, one to the north of Oadby and the other on land separating Oadby and Wigston.</p> <p>As part of the further expansion of the site, there is the opportunity to provide new green infrastructure in association with this development.</p>	<p>Noted.</p>

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
Sustainable Development, Climate Change, Water and Flood Risk			
Questions 53-59 General comments (please see individual comments that follow for question text)	Pegasus Group	<p>The existing Building Regulations allow for high standards of energy efficiency and sustainable construction.</p> <p>Expansion of the Direction for Growth will include community facilities which will encourage more sustainable modes of travel</p>	Noted
	Paul Tame NFU	Farms can be ideal places for wind turbines, pv, solar, anaerobic digestion, biomass and biofuels plant provided they do not cause nuisance to others. On farm renewable can help us to meet EU renewable targets.	The Council are currently undertaking evidence gathering in terms of renewable energy and climate change and the findings of this study will inform policies on renewables and also whether land can be allocated for particular forms of renewable energy.
53. How should the Local Plan protect the Borough from the effects of climate change?	Lesley Thornton	<p>Local Plan should go beyond government regulations in terms of standards for sustainable buildings.</p> <p>Hard surface areas should be banned ie driveways</p> <p>More tree planting</p>	The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance. The Local Plan may only be able to go beyond government guidance in some circumstances if it can be proven through evidence that this can be supported. The Local Plan

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			will look for opportunities to encourage more permeable surfacing and tree planting through relevant policies such as managing the risk of flooding and local green spaces etc
	Geoff Platts Environment Agency	By promoting renewable energy schemes, preserving the floodplain and investing in sustainable transport options	The Council are currently undertaking evidence gathering in relation to climate change and the findings of this study will inform policy development. The Local Plan will include policies in relation to protection of flood plains and promotion of sustainable transport options.
	Mary Ray and Tony Sumpter	<p>Concerned that central government is proposing that any development has precedence over all other considerations and that this will be detrimental to the environment. They feel that the Council and its officers have a higher duty than fulfilling central government demands. There should be maximum protection to existing green spaces, gardens and treescape. Paving over should not be encouraged.</p> <p>New development should maximise requirements for sustainable construction and modes of transit. Section 106</p>	The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance. The Local Plan may only be able to go beyond government guidance in some circumstances if it can be proven through evidence that this can be supported.

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		<p>agreements should cover local schools and GP practices. Insist on protection for existing trees, high quality tree planting schemes, TPOs on newly planted trees and landscaping schemes including natural open space.</p> <p>Concern also raised in relation to need to restrict car parking spaces, start charging for Council car parks, more 20mph limits in the Borough, need more Zebra crossings, cycle routes and discourage parents driving children to school</p>	<p>The Council are currently undertaking evidence gathering in terms of climate change, local green spaces and sustainable design and the findings of these studies will inform relevant policies.</p>
<p>54 How should the Local Plan promote the use of energy efficiency and sustainable construction?</p>	<p>Define</p>	<p>Local Plan should take account of the Government's Housing Standards Review but should not seek to repeat or expand upon standards dealt with through Building Regulations</p>	<p>The Local Plan will take account of all current Government policy and guidance where relevant.</p>
	<p>Gladman Developments</p>	<p>The Local Plan should avoid setting standards not required by the Framework and also in line with the provisions of the Deregulation Bill 2015.</p>	<p>Noted. The Local Plan will take account of all current Government policy and guidance where relevant</p>
	<p>Lesley Thornton</p>	<p>Detailed development plans which stipulate sustainable design requirements, materials and construction.</p> <p>Renewable energy systems should be built into all new developments</p>	<p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance. The Local Plan may only be able to go beyond government guidance in some circumstances if it can be proven through evidence that this can be supported. The Local Plan</p>

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
			will contain policies that seek to ensure we achieve new development that is sustainable in terms of design and construction.
	Mary Ray and Tony Sumpter	Developers should be made aware that this Borough takes climate change extremely seriously and insists on high standards.	<p>The Council are currently undertaking evidence gathering in terms of renewable energy, climate change and sustainable design and the findings of these studies will inform policies on energy efficiency and sustainable construction.</p> <p>The Local Plan will contain policies that seek to ensure we achieve new development that is sustainable in terms of design and construction.</p>
	Geoff Platts Environment Agency	The Local Plan should address promote renewable energy schemes, preserve the floodplain and invest in sustainable transport options not only energy efficiency but also water efficiency, by promoting water efficient appliances, rainwater harvesting, grey water re-cycling, green roofs, water butts and sustainable drainage systems (SUDS). Consider using areas of open space to act as areas for flood storage as well as	The Council have published a Strategic Flood Risk Assessment and is currently undertaking evidence gathering in relation climate change. The Local Plan will contain policies that seek to ensure we achieve new development that is sustainable in terms of water

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		amenity.	efficiency as well as energy efficiency. The Local Plan will consider using areas of open space for flood storage where relevant evidence gathered would support this.
55. How can the Local Plan encourage sufficiently high standards in new development to limit greenhouse gas emissions?	Lesley Thornton	As comments for Question 54.	Noted
	Mary Ray and Tony Sumpter	As covered in previous questions.	Noted
56. How can the Local Plan ensure that buildings are designed so as to have a longer useful life (eg to evolve with changing lifestyles and home occupation patterns)?	Mary Ray and Tony Sumpter	Maximise public sector house building and set our own standards.	The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance. The Local Plan may only be able to go beyond government guidance in some circumstances if it can be proven through evidence that this can be supported.

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
<p>57. Is there any scope to enhance and extend the Borough's network of green spaces in order to manage flood risk and address other climate challenges?</p>	<p>Lesley Thornton</p>	<p>Green corridors, spaces and tree planting must be included in new designs.</p>	<p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance. The Local Plan may only be able to go beyond government guidance in some circumstances if it can be proven through evidence that this can be supported. The Local Plan will look for opportunities to encourage more permeable surfacing and tree planting through relevant policies such as managing the risk of flooding and local green spaces etc.</p>
	<p>Mary Ray and Tony Sumpter</p>	<p>Yes but the will to act required. Reference is made to a development management decision.</p>	<p>This comment is not relevant to the Local Plan consultation</p>
<p>58. How can we encourage the use of adaptations like shading, natural and passive ventilation, and better drainage systems in new</p>	<p>Lesley Thornton</p>	<p>Plan must not allow non porous hard outside surfaces which increase flooding risks. Plan must encourage the above.</p>	<p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance. The Local Plan may only be able to go beyond government guidance in some circumstances if it can be proven through evidence that this can be supported. The Local Plan</p>

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<i>development?</i>			<p>will look for opportunities to encourage more permeable surfacing through relevant policies such as managing the risk of flooding and local green spaces etc</p>
	Mary Ray and Tony Sumpter	Put these things in the requirements on granting planning permission. This will happen only if the right policies are in place as evidence for doing this.	<p>The Council are currently undertaking evidence gathering in terms of sustainable design and construction and the findings of these studies will inform relevant policies.</p> <p>The Local Plan will seek to ensure that new development is sustainable in terms of adaptations such as shading, natural and passive ventilation and better drainage where the evidence supports this.</p>
59. Commercial and small scale wind, solar photovoltaic, solar thermal, ground source	Lesley Thornton	The plan must identify land for renewable energy use and demand/encourage systems to be included in new build.	The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance. The Local Plan may only be able to go beyond government guidance in

QUESTION	STAKEHOLDER	SUMMARY OF COMMENT RECEIVED	BOROUGH COUNCIL RESPONSE
<p><i>heat, hydro electric and biomass technologies enable more sustainable energy to be generated. How should the Local Plan make provision for such technologies in the Borough?</i></p>			<p>some circumstances if it can be proven through evidence that this can be supported. The Council are currently undertaking evidence gathering in terms of renewable energy and climate change and the findings of this study will inform whether land can be allocated for particular forms of renewable energy or inclusion in new developments.</p>
	<p>Mary Ray and Tony Sumpter</p>	<p>Require them in new developments and in applications for extensions etc. Again this is best achieved by putting policies in place.</p>	<p>As response to Question 58.</p>