

## Appendix C – List of key matters and issues

### Matter 1: Legal compliance (Chapters 1 and 2)

- 1.1 Does the AAP meet all its **legal requirements**, especially in matters such as: the Local Development Scheme (LDS); the Sustainable Community Strategy (SCS); the Statement of Community Involvement (SCI); the Oadby and Wigston Core Strategy; Habitats Regulations; the Duty to Co-operate; and the Local Development Regulations 2004, as amended in 2008?

Commentary:

- (i) **Oadby and Wigston Borough Council (OWBC)** considers that the AAP meets all its legal requirements; AAP is in general conformity with the *Core Strategy*, which shares a vision with the *Sustainable Community Strategy*.

- 1.2 Are there any differences of emphasis between the AAP and the **Core Strategy**?

Commentary:

- (i) **OWBC** considers that there are no differences of emphasis between the AAP and *Core Strategy*. Since the preparation of the Delivery Strategies, however, it has been a challenge to meet tests of soundness and to be in general conformity with the *Core Strategy*.

- 1.3 How does the AAP relate to the main recommendations of the **Sustainability Appraisal (SA)**? **A situation update from the Council is required, to give a brief explanation of the reasons for selecting the alternatives which are being supported in the AAP.**

Commentary:

- (i) **OWBC** considers that the AAP directs new development to the town centres as opposed to greenfield sites in the Borough, in line with the SA. AAP also contains set of strong development control policies to mitigate impacts of town centre development and public realm improvement policy. SA concerns over increased cars using town centre has resulted in policies for improved bus cycle and walking facilities.

- 1.4 How does the AAP relate to the recent **Localism Act**, the Government's **Growth agenda** and the **National Planning Policy Framework (The Framework)**?

Commentary:

- (i) **OWBC** considers that the AAP has been prepared very much in the spirit of the Localism Act, with a lot of consultation with local people and groups/organisations, as well as co-operating with neighbouring councils, service providers and stakeholders. The Growth Agenda and in particular the prioritisation of growth and jobs is reflected in the aims and objectives of the AAP. The underlying principle of the AAP is to ensure the two town centres remain competitive now, throughout and beyond the plan period and provide for the growth in employment, retail and housing opportunities in order to achieve this.

The AAP contributes towards the aims of *the Framework* to pursue sustainable development in aspects such as job creation; net gains in bio-diversity; improving the standard of design; improving conditions in which people live, work, travel and take leisure; and widening the choice of high quality homes. The AAP is in full conformity with the guidance in *the Framework* on town centres (paragraph 23), and aims to bring about economic, social and environmental regeneration of both Oadby and Wigston town centres. The AAP sets a threshold of 2,000m<sup>2</sup> to trigger an impact assessment, ie less than the 2,500m<sup>2</sup> threshold in *the Framework*. **Council suggested change** – extend remit of policy 5 to include reference to office development.

In relation to paragraph 14 of *the Framework*, Model policy should be incorporated into policy 1; **Council suggested change** – change policy wording of policy 1 to underline positive approach that reflects the presumption in favour of sustainable development.

- (ii) **Leicestershire Constabulary** considers that the AAP's soundness is compromised by omissions in the Strategy for Infrastructure, as police infrastructure is not included.

## **Matter 2 – Relationship to other areas (Chapter 2)**

- 2.1 **Neighbouring plans and strategies:** How does the AAP relate to the plans and strategies of the City of Leicester and other neighbouring local planning authorities?

Commentary:

- (i) **OWBC** considers that the AAP directly reflects and expands on *Core Strategy* policy 2. It reflects the Leicester Urban Area Retail Strategy.
- (ii) **Leicestershire County Council Town Centre Coordinator (LCC - TCC)** states that the AAP complements the surrounding neighbourhood plans and strategies.

- 2.2 How far has the plan taken on board the **plans and programmes of statutory providers and regulatory agencies**, such as transport companies, the Environment Agency, the utility companies, and **local businesses** and **community groups and agencies**?

Commentary:

- (i) **OWBC** considers that the necessary plans and programmes of other agencies have been suitably taken into account, where these have been identified through engagement and research or put forward by others.

- 2.3 **Beyond the boundaries:** Is there a strong contextual relationship between the town centres and neighbouring areas?

Commentary:

- (i) **OWBC** considers that there is an acknowledgment of the relationships between the various centres in and around Oadby and Wigston, which is reflected in the AAP.

## **Matter 3 – Wigston Town Centre (policies 13-16)**

- 3.1 How robust are the **spatial vision and objectives** for Wigston town centre (paras 4.18-4.28), for example in relation to any reasonable alternatives, and in the face of the current economic climate? What is the **economic justification for the scale of the proposed retail provision in policy 13**, in view of factors such as the proximity of rival centres, eg Highcross and Fosse Park, the growth in internet shopping and the number of existing empty retail units in the town centre? How much comparison retail floorspace has been completed over the last decade? What would happen if the retail growth set out in policy 13 failed to materialise? Would it not be cheaper and more cost effective to focus on bringing into use empty shop units in the town centre?

Commentary:

- (i) **OWBC** considers that the necessary planning policy and public sector intervention and support is now in place for Wigston to become a very attractive proposition to retail and commercial organisations. The alternatives – not to invest in the town centre or to seek greater investment in the town centre - would not accord with the Core Strategy. Given the plan period extends to 2026, there is likely to be a significant improvement in the economic climate during that time, but the Council has not been over optimistic.

The justification is provided in the Council's Retail Capacity Study (2008), which was accepted by the *Core Strategy* Inspector. Policy 13 provides for 1,200 m<sup>2</sup> less than approximate figure in the *Core Strategy*, which is partly to reflect changes in the current economic climate. Maximising potential growth is seen as important to capitalise upon planned population growth – otherwise the potential extra spend could be lost to rival shopping centres, such as Highcross and Fosse Park.

Empty units tend to be located towards periphery of shopping areas; creating new retail floorspace in more central locations with floor plates attractive to national

retailers will increase footfall in the town and therefore increase viability of some currently empty shop units.

**OWBC** does not monitor comparison retail floorspace completions, although confident that there has been no significant change in amount of comparison retail floorspace over the last decade. The Council is confident that the level of retail growth set out in policy 13 will materialise.

- (ii) **LCC - TCC** considers that Wigston has a high number of vacant units compared to its neighbouring town centre, with a poor offer of both convenience and comparison retailing. It is also difficult to access adjoining centres by public transport.

- 3.2 **Relationship of the town centres:** In what ways should Wigston and Oadby town centres complement and not compete with each other?

Commentary:

- (i) **OWBC** states that the *Core Strategy* sets out two very different objectives for Wigston and Oadby town centres, which are reflected in the AAP. Wigston is the main centre, aiming for more national retailer representation and key service centre for the Borough; Oadby is smaller, catering for independent and specialist shops, whilst aiming to maintaining its current mix of national and local retailer representation.
- (ii) **LCC - TCC** considers niche independent stores are more likely to be attracted to Oadby, whilst Wigston could benefit from a wider range of independents and multiples, especially in the clothing sector, to attract more users.

- 3.3 How does the plan address the **nighttime economy**?

Commentary:

- (i) **OWBC** considers there is very little of the nighttime economy in either centre, and the towns suffer from the emptiness that this causes, and increases the likelihood of anti-social behaviour. The introduction of residential development on key sites should greatly encourage activity. Cafes and restaurants should increase evening footfall.
- (ii) **LCC -TCC** considers that the town centre has little to attract people in the evening, with few restaurants, no street markets or other attractors. Proposed town square could be suitable for holding events and help the evening economy to grow.
- (iii) **Anne Coulstock** states that Age Concern, which provides facilities for evening use by the wider community, not just for the elderly, is a key element in addressing the AAP requirement for a night time economy. The existing car parking provision is critical to its success, and for a 'safe' town centre.

- 3.4 Para 4.93, in relation to **Chapel Mill** (policy 16) refers to a proposed range of shop unit size, based presumably on the master plan. Is the desired range of retail unit size important to the viability and vitality of other parts of Wigston town centre as well, and if so, should policy 13 provide more direction, eg on a desired range of shop sizes/development plates to help the town centre maintain or enhance its distinctive retail offer?

Commentary:

- (i) **OWBC** considers that units at Chapel Mill lend themselves to a potential expansion of Sainsburys plus a number of smaller units, whilst Burgess Junction could provide for a range of large and small units, but the AAP needs to be flexible and needs to reflect the requirements of prospective retailers. But the aim is to increase national retailer representation.
- (ii) **LCC - TCC** notes that there appears to be a larger number of vacant small units, and considers there to be a need to attract a number of larger multiples who usually have a larger store footprint.

- 3.5 **New parking provision:** Is the provision of at least 500 new parking spaces (policy 13) justified in relation to national/Leicester CC sustainable transport policy and the highway authority's car parking standards? Would the impact of a new multi-storey car park (MSCP) at Burgess Street on the living conditions of neighbouring residential occupiers be acceptable? Would traffic congestion be a likely result of the proposal?

Commentary:

- (i) **OWBC** states that the number of storeys in the MSCP at Burgess Hill is not given in the plan, but that the provision of 500 new spaces would be a net increase of 194 spaces if the existing car parks at Junction Road, Frederick Street, Spring Lane and Paddock Street were to close. This increase reflects the amount of new uses introduced to the town. The MSCP would be located to the rear of office and retail development, to eliminate impact on adjoining residents (Appendix 1 shows cross section with a 4 storey MSCP).

Traffic congestion is unlikely, especially as the number of car parks would be reduced, together with overall increase in capacity. Burgess Junction MSCP could be accessed without having to drive through the centre of the town. A strong signage strategy is also important.

- (ii) **Leicestershire County Council – Highways Officer (LCC – HO)** considers that the robust study on current and potential parking demand satisfactorily demonstrates that the additional parking provision is required to accommodate the needs of the AAP development proposals and existing needs.

- 3.6 **Existing parking provision:** What would be the economic and social impact on the reduction of parking spaces in the Paddock Street car park, which several representations point out are used by local residents due to the shortage of on-street parking spaces, and by the disabled and elderly who use the nearby Age Concern facilities? How does the loss of these spaces link to the creation of additional spaces elsewhere in the town centre? **A situation update from the Council is required, outlining the resources required for the implementation of the proposals for new parking in both Wigston and Oadby, when these sources are likely to become available, especially in relation to the loss of the existing spaces, whether any delivery partners have been signed up (or are likely to be), and the impact of the loss of existing spaces on current users, particularly in relation to the elderly and mobility impaired, and affected local residents.**

Commentary:

- (i) **OWBC's** situation update states that the redevelopment of the Paddock Street car park is necessary to accommodate the number of housing units required by the Core Strategy, but an element of public car parking is still needed (a potential of 25-30 spaces is suggested). Both the loss of spaces at Paddock Street and provision of new MSCP at Burgess Junction are programmed for phase 1, so the amount of time the number of car parks might be compromised can be managed through the detailed plans for bringing forward development on both sites.

**Inspector's comments:** It is clearly critical that the AAP ensures that the town centre will not be bereft of sufficient car parking spaces during the implementation of phase 1 (or subsequent phases), so as to avoid a serious economic impact on the town centre.

- (ii) **Angela Bishop** considers that the reduction in parking spaces in Paddock Street is not justified in relation to the impact this would have on many of the users of Age Concern who are elderly, disabled and immobile, for whom it is crucial to be able to park opposite the centre. The loss of parking will reduce numbers, reduce funding and create difficulties in continuing to provide Age Concern's services.
- (iii) **Anne Coulstock** states that Age Concern provides facilities for evening use by the wider community, not just for the elderly. The existing car parking provision is critical to its success.

- 3.7 **Gateway site:** What is the reason for the location of the gateway site in the AAP? Should policy 13 refer to the proposed gateway improvement at the junction of Leicester Road/Frederick Street, as shown on the Proposals Map, and specify clearly what improvements the Council has in mind?

Commentary:

- (i) **OWBC** states that the Proposals Map inset should illustrate the other gateway improvement sites, as shown in fig. 4.1. They are significant areas for regeneration

and will create a sense of arrival and place. **Council suggested change** – change wording of policy 11 to take account of gateway improvements illustrated on Proposals Map. All public realm works within town centres will need to be consistent with the Draft Public Realm SPD.

- 3.8 Has the potential for **increased pedestrian priority** (policies 13-16) been maximised? Should the proposed new shopping street (para 4.39) be clearly identified on the Proposals Map and in a policy? **A situation update from the Council is required on pedestrian priority in Wigston town centre, in relation to pedestrian flows, focal points, development phasing and the quality of the public realm.**

Commentary:

- (i) **OWBC's** situation update explains that there are no fully pedestrianised shopping streets in Wigston town centre; the AAP policies 13-16 have an emphasis on improving pedestrian connections; key elements include the extension to the historic lanes network links all parts of the town centre and the provision of a retail circuit, including the improvement and extension of The Lanes; these will give the town centre a greater connectivity.

See Document 6 for the Delivery Strategy to include phasing. LCC and OWBC are in partnership to submit detailed applications for ERDF funding for public realm schemes, including Bell Street, to improve pedestrian safety and movement.

Current quality of public realm is relatively poor; high standards are set out in policy 11, and the Draft Public Realm SPD has targeted redevelopment of The Lanes and full pedestrianisation of Bell Street.

The AAP identifies 6 focal points, including gateways and public squares, to draw the public into the town centre shopping areas.

If the extension to The Lanes was specifically shown on the Proposals Map, it could restrict and stifle creativity, as other solutions may emerge. **Council suggested change** – change the wording of paragraph 4.39 to clarify policy 14, in particular by making reference to linking to and incorporating an extension to The Lanes.

**Inspector's comments:** If the Council is aiming to fully pedestrianise Bell Street, should this appear in relevant policies in the AAP? The Lanes is clearly a key element in the implementation of a retail circuit and securing the regeneration of the town centre; as such, it is important that the AAP provides clarity by showing its route on the Proposals Map.

- (ii) **LCC – TCC** considers the quality of the town centre to be poor, and not aesthetically pleasing, but not a hazard.  
(iii) **LCC – HO** considers that The Lanes improvements and other schemes in the AAP sufficiently increase pedestrian priority.

- 3.9 Are the proposed **changes to any of the road layouts** justified? Although policy 12 refers generally to highway works, should the specific highway schemes be included in relevant policies? Are there land use implications in any of these schemes?

Commentary:

- (i) **OWBC** states that no major changes to road are proposed layouts, just minor amendments to highway alignments, etc. **Council suggested change** – change the wording of policy 12, bullet point 5 to refer to improved bus facilities along Leicester Road.  
(ii) **LCC – TCC** states that the public sector is unlikely to contribute to public realm in the current economic climate, so there is a need to secure private sector development site funding for contributions for the public realm.  
(iii) **LCC – HO** considers that the principle of the schemes included in the Transport Report is appropriate and deliverable, subject to funding.

- 3.10 Do policies 13-16 provide sufficient focus and direction to enable the potential for enhancing the **public realm** to be maximised?

Commentary:

- (i) **OWBC** consider that policy 13 can be strengthened by the following **Council suggested change** – paragraph 4.54 to refer to the emerging Public Realm SPD, whilst policies 14, 15 and 16 should be amended by the inclusion of an additional bullet point, to refer to the need for consistency with the emerging Public Realm SPD.

- 3.11 What is the justification for the proposal for **new health provision** in policy 14, in view of the representation by the Primary Care Trust that they are interested in another site?

Commentary:

- (i) **OWBC** states that the Primary Health Care Trust has identified the need for new health provision in Wigston, but a site has not yet been secured – policy 14 therefore needs to be flexible.

- 3.12 Is the **amount and type of housing provision** in Long Lane (policy 15) appropriate for local needs? Is there any housing potential in other parts of the town centre? Some concern is expressed that the proposed apartments, forming part of the mix in areas such as the Long Lanes, may continue to be unattractive in the current difficult market conditions. Is a proportion of affordable housing appropriate within the AAP and if so, how much?

Commentary:

- (i) **OWBC** considers that the *Core Strategy* policy 11 sets out the Council's affordable housing requirements on all developments of 10 dwellings or more.

- 3.13 In all other respects are the proposals for development in the key development sites at **Burgess Junction, Long Lanes and Chapel Mill** (policies 14, 15 and 16 respectively) justified and effective?

Commentary:

- (i) **OWBC** considers that in all respects the AAP is consistent with the approximate levels of development in the *Core Strategy*.  
(ii) **LCC – TCC** states that other than retail there is little town centre employment, because of lack of office space and light industry; provision for these uses would attract new businesses and increase vitality and viability of the centre.

- 3.14 How much guidance does the plan provide to ensure that the development of town centre sites pays special attention to **conservation and archaeological implications**?

Commentary:

- (i) **OWBC** refers to *Core Strategy* policy 15, but it has a **Council suggested change** – paragraph 4.43 should be amended to refer to need to conserve the historical character of the Long Lanes site, with a similar amendment to paragraph 4.73, to reflect the Long Lanes situation.  
(ii) **LCC – TCC** considers that the new public square would open up some of the more attractive buildings, such as the church off Frederick Street, to public view.

- 3.15 Are there any **other development opportunities** in Wigston that the plan should be addressing, eg public amenities such as toilets?

Commentary:

- (i) **OWBC** considers that all appropriate development opportunities have been taken account of; publicly accessible toilets will come forward through more detailed work, eg planning briefs, etc.  
(ii) **LCC – TCC** considers that the public toilets need to be upgraded.

- 3.16 Is the relationship between Wigston town centre and the developments associated with **Direction for Growth** to the south east sound?

Commentary:

- (i) **OWBC** considers that the relationship between Wigston town centre and the Direction for Growth to the south-east of Wigston is sound. The provision of a direct bus link between the Direction for Growth and Wigston will be assisted by the provision in policy 16 for a new public transport area on Bull Head Street.
- (ii) **LCC - TCC** considers that Wigston town centre is the nearest town centre to the Direction of Growth – there is a need to emphasise pedestrian and cycle links between the two and ensure only a small amount of retail provision is provided within the Direction of Growth.

#### **Matter 4 - Oadby Town Centre (policies 17-21)**

- 4.1 Although there is recognition from some groups that Oadby town centre needs to move forward, several representations argue for keeping Oadby as it is and that the plan will lose rather than gain jobs. What is the **economic justification for the scale of the proposed retail provision in policy 17**, in view of factors such as the proximity of rival centres, eg Highcross and Fosse Park, the growth in internet shopping and the number of existing empty retail units in the town centre?

Commentary:

- (i) **OWBC** considers that staying still would result in Oadby losing out to rival town centres, which are likely to gain from investment. Most of the new development at Baxter's Place/Brooksby Square will be new build development, which would allow existing businesses to expand. The scale of retail development is justified by the Council's Retail Capacity Study (2008), and by the more recent evidence of Waitrose foodstore. Also the likely improvement in the economic climate over the plan period is relevant.
- (ii) **LCC – TCC** considers that despite low level of vacant units, a good range of independents and some multiples, there is still a need to attract more to increase the amount of comparison shopping; and there is a danger that shoppers visiting the good range of convenience shopping on the outskirts of the town centre will drive away without visiting the town centre. The town centre needs to become a destination, for events and services as well as shopping.
- (iii) **Oadby Town Centre Association (OTCA)** considers that the AAP retail floorspace target of 5070 m<sup>2</sup>, which is lower than the spatial objective of 5213 m<sup>2</sup>, but in excess of Core Strategy policy 2, which calls for approximately 5,000 m<sup>2</sup>, is not justified; the term 'district centre' is confusing; **OTCA Suggested changes** – reword policy 17 as follows: (1) replace 'district' with 'town'; (2) targets should reflect current and predicted economic situation – therefore aim at 80% of Core Strategy figures (800 m<sup>2</sup> office floor space; 4,000 m<sup>2</sup> retail floorspace; 64 new residential units over the plan period); (3) there should be no parking figure, but a target of at least 90% of LCC maximum; and (4) replace reference to masterplan with the Council will look favourably on planning applications proposing community use buildings in suitable locations within the town centre.
- (iv) **Trinity Methodist Church (TMC)** considers that there is clear evidence since the *Core Strategy* Examination to justify reducing the retail floorspace figures in the AAP. These can be summarised as: 2007 data previously used has been overtaken by post-recession figures, indicating that a lower floorspace requirement is appropriate; internet retailing is set to increase further; convenience floorspace is well provided for, whilst the potential for comparison goods shopping is limited by lack of choice and proximity of Leicester city centre and Fosse Park. The latest Council Area Schedule (April 2012) reduces the retail requirement at Brooksby Square from 500 m<sup>2</sup> to 200 m<sup>2</sup>, so that the deletion of this amount would not be significant in relation to the *Core Strategy* 'approximate target'.

- 4.2 **A situation update from the Council is required on the plans for Oadby town centre, including justification of the proposed schemes, how, where and when they would be implemented, and public and private sector resource implications. Would proposals for and to the north of Brooksby Square, and for Baxter's Place, distract from the core of Oadby, which several representors consider to be The Parade?**

Commentary:

- (i) **OWBC** states that Brooksby Square enables *Core Strategy* housing provision to be met and a public square to be established near the Methodist church, which has been changed to shared use to include car parking following consultation responses. Opportunities to improve the public realm would also be realised. Baxter's Place provides new retail and commercial floorspace in line with *Core Strategy* provision, community use and a decked car park.

Oadby does not have a defined core, although the policies for The Parade (20) and The Precinct (21) ensure that these remain a firm focus of Oadby town centre.

- (ii) **Oadby Civic Society** considers that the proposed Brooksby Square is not justified, with the area retained for car parking.

- 4.3 **What type of retail provision?** What evidence is there that the lack of modern sized units is preventing investment, especially in view of the statement (in para 5.22): "the town's strength will lie in its interesting mix of shops, cafes, bars and restaurants, focused on the independent offer"? Are anchor stores the answer? How does the plan relate to the Core Strategy spatial objective 3, which is to establish Oadby as a small town centre catering for smaller independent and specialist shops?

Commentary:

- (i) **OWBC** considers that the new retail floor space and especially anchor stores increase overall footfall which lends support to smaller, independent businesses; the presence of national brands in The Parade has brought about a positive impact upon footfall levels in the town centre as a whole. Policy 19 allows for a circular route for pedestrians, which currently does not exist in Oadby.
- (ii) **LCC – TCC** considers it is vital to move the development sites forward in order to attract new footfall into the town centre and maintain vitality.
- (iii) **Anne Garrick** states that the AAP focuses too much on the unjustified expansion of retail provision and not enough on encouraging higher grade employment, in particular small manufacturing or technical businesses.

**Inspector's comments:** If the intention to implement a circular route for pedestrians is serious, should not the Council include this in one of the relevant policies in the AAP, rather than just giving it a passing mention in paragraph 5.39?

- 4.4 How does the plan address the **nighttime economy**?

Commentary:

- (i) **OWBC** considers the nighttime economy is important for Oadby for the same reasons as for Wigston (see issue 3.3 above). The increased number of cafes, bars and restaurants would enhance footfall in addition to new housing in the town centre.
- (ii) **LCC – TCC** considers Oadby, with its high quality restaurants and town centre pubs, has more potential to develop the nighttime economy than Wigston.
- (iii) **TMC** questions the need for more cafes and pubs, when the church is about to implement a planning permission for a café and one of the 7 town centre pubs has just closed. The growth in this sector has been, and will continue to be, Leicester city centre, so the inclusion of leisure uses in Oadby town centre must be questioned.

- 4.5 Para 5.67, in relation to **Baxter's Place** (policy 19), refers to a range of retail floorspace sizes size to accommodate modern retailer requirements, based presumably on the master plan. Is the desired range of retail unit size important to the vitality and viability of other parts of Oadby town centre as well, and if so, does policy 17 need to provide more direction, eg on a desired range of shop sizes/development plates to help the town centre maintain or enhance its distinctive retail offer?

Commentary:

- (i) **OWBC** considers that flexibility is needed to avoid the risk of more empty shops, whilst the Town Centre Partnerships and the Council will consider details of retail floor sizes, etc at the appropriate time.



- (ii) **LCC – TCC** considers that there is a need to include in the plan the approximate mix of retail uses in order to stop the dominance of fast food outlets that is happening in other centres.

4.6 Planning to meet **ethnic and religious demands**: Why does the AAP single out Oadby for provision to meet the ethnic/religious demands of the Borough?

Commentary:

- (i) **OWBC** based its approach on the consultants' study (Faith Community Profile and Places of Worship Needs Assessment), which identified a concentration of local need, especially in relation to the Black and Minority Ethnic (BME) population. This also accords with *the Framework* paragraph 70, which includes the need to plan positively for places of worship. The Muslim Association has bought the former Library in Sandhurst Street; an additional community facility is not now being sought by the Council, but would seek reinstatement of the current facility when the car park is redeveloped.
- (ii) **LCC – TCC** acknowledges the diverse cultural mix of the area.

4.7 Is the proposal for a **community use building** (policy 17) justified and effective?

Commentary:

- (i) **OWBC** state that Core Strategy policy allows for the development of such uses where a need is demonstrated. In addition to its comments on 4.6, a sure start children's centre was considered, but funding cuts have ruled it out, at least for the present. The Council considers that the current inclusion of the existing community space and place of worship at Baxter's Place accords with this policy.
- (ii) **LCC – TCC** Yes, the existing community buildings are very well used.
- (iii) **Oadby and Wigston Muslim Association** supports the need for a dedicated like-for-like secure, exclusive and accessible place of worship in Baxter's Place.
- (iv) **OTCA** considers that the phrasing of the policy regarding a community use building is ambiguous and therefore ineffective and such uses should not be given priority overuses such as car parking or improved access, which are more crucial to the regeneration of the town centre, and make the plan more ineffective.
- (v) **Oadby Civic Society** considers that the provision of a community use space in Baxter's Place is unacceptable because of poor access, potential nuisance and conflict with existing parking use needed for the proposed retail space; it should be located where dedicated parking can be provided, not taking away parking for shoppers.

4.8 Has the potential for **increased pedestrian priority** been maximised?

Commentary:

- (i) **OWBC** considers that where possible the AAP has considered the requirements and needs of pedestrians. Full pedestrianisation of The Parade was discounted following representations from the public and LCC. The Council is pursuing ERDF funding for public realm improvements. Priority is given where possible to pedestrian needs, with a pedestrian link planned from Brooksby Square to The Parade.
- (ii) **LCC – HO** states that the AAP's pedestrian improvements sufficiently increase pedestrian priority.

**Inspector's comments:** See comments under 4.3 above.

4.9 Is the **severance effect of the A6 main road** on Oadby a perception, or is there robust evidence? If so, how can the AAP address this issue?

Commentary:

- (i) **OWBC** states that the severance effect of the A6 on Oadby is widely accepted by the population. Improved signage and public realm would help, but the idea of a significant improvement to the A6/The Parade junction was not supported by the highway authority (LCC – HO).
- (ii) **LCC – TCC** Many shoppers find the A6 a barrier; AAP can address these issues by providing for more/larger retail units in the town centre, with a wider range of comparison shopping to tempt people into the centre.

- 4.10 **New parking provision:** Is the provision of at least 370 new parking spaces (policy 17) justified in relation to national/Leicester CC sustainable transport policy? Would the impact of a new two-storey car park at Baxter's Place on the living conditions of neighbouring residential occupiers be acceptable? Would traffic congestion be a likely result of the proposal? Should policies 18 and 19 be more specific on the design and environmental mitigation aspects of the proposed car parks in order to address some of the concerns raised by representations?

Commentary:

- (i) **OWBC** states that the 370 parking spaces figure is the existing total – hence the policy seeks to maintain the existing number of spaces and is not proposing 370 new spaces. The detail is appropriate for an AAP with further details at planning application stage. The layout of the Baxter's Place half-sunk decked car park has been carefully considered, and changes were made after consultation, including lowering the deck height of the car park, so that it would not be as tall as a two-storey development. The use of development management tools, eg separation distances between habitable windows and flank walls, and using appropriate materials, can address impact on the living conditions of neighbouring residential occupiers. New servicing requirements could be controlled through a Traffic Regulation Order. Too much detail would stifle flexibility.
- (ii) **LCC – HO** expects new parking provision to be in accordance with the 6Cs design guide, and observes that current car park is of poor quality with a confusing layout.
- (iii) **OTCA** states that a minimum target of 370 spaces has no justification; parking is crucially important to the vitality and viability of the town centre. Moreover, the location of the parking is as important as the total number of spaces. By not taking account of this, the plan would be ineffective in attracting more business to the town centre.
- (iv) **Oadby Civic Society** considers that the Brooksby/East Street car park should be retained in its entirety and simply replanned to provide a more effective layout.
- (v) **TMC** considers that, while the intention is to retain the same number of car parking spaces overall, the new developments proposed will themselves generate a need for more car parking. The parking situation will therefore be worse, even if the overall number of spaces remains the same. Moreover, the proposed two-storey car park at Sandhurst Street will have an adverse impact on neighbouring residential living conditions.
- (vi) **Margaret Rawson** states that the proposed MSCP at Sandhurst Street would be unsightly, with the only access being via Sandhurst Street; it would also overlook the neighbouring bungalows and take away their privacy.
- (vii) **Ann Squires** states that Sandhurst Street is not suitable for the heavy traffic that would be generated by the construction of the MSCP; it would also overlook the neighbouring bungalows and take away their privacy.

Inspector's comments: Policy 17 could be reworded to explain that the existing number of parking spaces is about 370 (or 373 to be exact), and the impact of the Brooksby Square and Baxter's Place redevelopment schemes will secure at least an equivalent number of parking spaces (in which case policies 18 and 19 need to total 370 ). This would clarify any misunderstanding and make it clear that the policy was sustainable, and therefore justified.

- 4.11 **Existing parking provision:** What would be the economic and social impact of the reduction of parking spaces in the East Street/Brooksby Drive car park, which several representations point out are used by significant numbers of the disabled and elderly? Representations in particular point out impact on the well used Methodist Church and the increased likelihood of people changing to out of centre retailing, such as the nearby Asda superstore and further afield. Would the loss of easy access (referred to positively in the Core Strategy para 3.14) to and from the A6 significantly add to vehicle congestion in the town centre? How would the loss of these spaces link to the creation of additional parking spaces elsewhere in the town centre? **A situation update from the Council, as outlined in para 3.6 above, is required for Oadby as well as Wigston.**

Commentary:

- (i) **OWBC** states that it has recently revised its proposals for East Street Car Park to include a redesign which would enable the public square to allow for 'shared use'; this

would mean that there would be no net loss of car parking spaces within Oadby town centre. In terms of access to shops and services, the Sandhurst Street Car Pak, which is generally perceived to be more remote than the East Street Car Park, is a broadly similar distance on foot. The Council considers that the town centre can hold its own with out of centre retailing; the access from the A6 will remain open, although remodelling of this access would be financially prohibitive. The phasing would allow for the East Street redevelopment to be complete by 2016, prior to the implementation of Sandhurst Street in phase 2 after 2016.

- (ii) **LCC – HO** requires the proportions of disabled parking must comply with the standards in 6Cs design guide.
- (iii) **Oadby Civic Society** considers that the north end of the East Street car park should be left open to view and landscaped. Parking is the lifeline of Oadby residents and such provision should be retained/improved.
- (iv) **TMC** considers that the recent Council changes to introduce a shared use public square are an improvement but an inadequate one, since 21 spaces adjacent to the church would be lost. This will affect the elderly and disabled users of the church, whilst the spaces at Sandhurst Road will be of little value, as they would be too far away from the church building.

4.12 Has the potential for **enhancing the public realm** been maximised?

Commentary:

- (i) **OWBC** point to policies 17-21, which all prescribe significant improvements to the public realm in the town centre; a joint OWBC/LCC bid for ERDF funding for public realm improvements in Oadby town centre is well advanced. **Council suggested change** – strengthen policies 17-19 and paragraph 5.81 by requiring all public realm redevelopment to conform to the principles in the Public Realm SPD.
- (ii) **LCC – TCC S 106** monies on their own will not be sufficient to enable public realm schemes to happen; alternative funding sources are needed, eg ERDF funding, some of which is anticipated to commence in 2013.
- (iii) **TMC** whilst considering the Council's public realm SPD to be good, expresses concern over its deliverability – and that with limited resources, improvement of The Parade, which is the focal point of the town centre, should take priority, at the expense of Brooksby Square.

4.13 In what ways will the plan be making provision for **civic functions**? (para 5.26). In view of the Primary Care Trust's (PCT) representation, should there be a proposal for a health centre in Oadby town centre?

Commentary:

- (i) **OWBC** considers that a health facility is considered to be a main town centre use. The particular needs of the PCT and a location would need to be subject to further negotiation.

4.14 Why does the **reduction of office development** due to changing economic times not equally refer to retail development?

Commentary:

- (i) **OWBC** state that there was a typing error – the reference in paragraph 5.49 should be for retail development. The economic prospects, however, are likely to improve and the current vacancy rate in the town centre is very low. The amount of office space has not been reduced, reflecting Oadby's position as the defined office centre in the borough.
- (ii) **OTCA** considers the figure of 2,300 m<sup>2</sup> is unsound, especially in view of the large empty Tenon/Vantis office block on Harborough Road, and lacks relationship to the Core Strategy which calls for approximately 1,000 m<sup>2</sup>.
- (iii) **TMC** states that the proposed 1,500 m<sup>2</sup> of commercial floorspace would generate additional car parking requirements, which will be difficult to be accommodated if East Street car park remains the same, but would affect the viability of the town centre if reduced. Several alternative office locations nearby are on the market, and there is plenty of vacant office floorspace in Leicester city centre. There is little demand for office accommodation and its inclusion in the AAP must be questioned.

- 4.15 Is the **amount and type of housing provision** appropriate for the needs of Oadby? Is the proposal for 35 units, 3/4 storeys high on the part of the existing East Street car park appropriate in streetscape terms? Is a proportion of affordable housing appropriate and if so, how much?

Commentary:

- (i) **OWBC** considers that the amount of housing provision in the centre of Oadby – 75 dwellings – is broadly in line with the *Core Strategy* target of 80 dwellings. Apartment development is the most efficient use of land where there is little land available for residential development. The East Street site would also make a positive statement at a gateway site. Residential development is also considered necessary to help deliver the regeneration of the centre. Its deletion would be out of conformity with the *Core Strategy*.
- (ii) **OTCA** considers that there is no justification for the plan's provision of 75 dwellings falling short of the *Core Strategy's* provision of 80 dwellings.
- (iii) **Oadby Civic Society** considers that the proposed residential development at the north end of East Street Car Park reduces parking for shoppers, and that any need to meet residential quotas would be better provided in The Parade or in conjunction with proposed new residential development on South Street.
- (iv) **TMC** whilst accepting that meeting the Borough's housing needs is important, the Council's Residential Land Availability Report (October 2011) shows there is a 5 year housing need for 450 dwellings and a supply of 552 dwellings. Moreover *the Framework* (paragraph 48) now allows for windfall sites to be included. In the town centre, there are already many residential properties, which means that there is no need for 35 flats for Brooksby Square, and that their deletion would not be out of line with the *Core Strategy*.

- 4.16 In all other respects are the proposals for development in the key development sites at **Brooksby Square, Baxter's Place and The Parade** (policies 18, 19 and 20 respectively) justified and effective? If the AAP proposals for Brooksby Square were deleted, would the AAP be out of conformity with the Core Strategy?

Commentary:

- (i) **OWBC** considers that Brooksby Square will help deliver the commercial and retail floor space figures in the *Core Strategy*.
- (ii) In relation to policy 18, **OTCA** supports the renovation of East Street Car Park and the provision of a new public square, but states that there is no aesthetic justification for any residential development facing Harborough Road, as the housing targets can be met elsewhere; additional office space is unnecessary; opposes reduction/relocation of parking spaces, and states that the policy should call for improvements in traffic flow and safety, especially in relation to the East Street car park exit to the A6 to the north. **OTCA Suggested changes** – amend policy 18 by (1) deleting reference to new residential development fronting Harborough Road; (2) change refurbished office block on South Street to residential; (3) increase target of car parking spaces from 150 to 200, and (4) include a commitment to improve junction of East Street and the A6.

In relation to policy 19, **OTCA** recognises Sandhurst Street Car Park as a logical area for redevelopment and welcomes new modern retail units to the town centre, but considers a target of 2,170 m<sup>2</sup> of retail floorspace to be overambitious and unlikely to be built and therefore ineffective, as would be 800 m<sup>2</sup> of new office floorspace, whilst the community use building is unjustified; the policy makes no attempts to improve the existing problems of access and egress associated with the new car park at Sandhurst Street; and the 200 car parking spaces target is unrealistic. **OTCA Suggested changes** – amend policy 19 by (1) reducing target retail floorspace by 20% to 1,736 m<sup>2</sup>; (2) delete references to commercial and community use; (3) change 200 parking spaces to maximum feasible number of spaces; and (4) include a commitment to improve access/egress to car park by providing an entry/exit point in Chestnut Avenue.

- (iii) **Oadby Civic Society** welcomes improvements to The Parade (policy 20). In relation to policy 19, additional retail space is supported, although its viability depends on high quality and attractive connections to The Parade, which seems to be compromised by the need for servicing arrangements for the new retail units. The proposed 2 storey car park should be deleted because of its impact on nearby housing and its convoluted

approach. In relation to policy 18, parking spaces at East Street should not be reduced.

- 4.17 What **other development opportunities** in Oadby should the plan be addressing, eg public amenities such as toilets?

Commentary:

- (i) **OWBC** is confident that the majority of development opportunities that were required to be taken into account in the preparation of the AAP have been. The Council has no plans to close any public toilets.

## **Matter 5 – Development management policies (policies 1-12)**

- 5.1 Are the **town centre boundaries** for Wigston and Oadby appropriately drawn (policy 1)?

Commentary:

- (i) **OWBC** considers that tightening the existing town centre boundaries focuses growth, especially retail and residential in the core areas of the towns and encourages the development of previously developed land, thus supporting their viability and vitality. The areas outside the town centres are predominantly residential. Policy 5 dealing with the AAP outside the town centre does not restrict proposals for new development in these areas to residential uses. The policy does protect residential living conditions and sets out square metre thresholds to protect residential areas from unacceptably large developments or changes of use that would have a detrimental impact on these areas. The primary and secondary frontages are in line with the *Core Strategy* (page 105).

Having the Waitrose site outside the proposed town centre boundary allows the Council greater control over future use, and ensures that any future development could only do so if it were not to have any detrimental impact on the town centre or the surrounding residential area.

- (ii) **OTCA** states that the redrawing of the current saved local plan town centre boundary excludes over 40 businesses in Oadby; this would force the closure of many shops, contrary to policy 2 of the *Core Strategy*, which states that it is essential that any new development does not have an adverse effect on existing centres, and cannot therefore be justified. The boundary change effectively removes the need for policies 2, 3 and 4, because there are hardly any secondary or other frontages remaining in the proposed Oadby town centre. Waitrose supermarket would also be excluded from the redefined town centre.

The boundary change requires *Core Strategy* housing, retail and commercial objectives to be recalculated, so that the whole plan becomes unsound. There is little justification for the proposed boundary change, whilst the redefining of the town centre has a destabilising effect which could render the plan ineffective. **OTCA Suggested changes** – reinstate existing local plan town centre boundary and amend text to define the core primary shopping areas as the 'town centre development areas'.

- 5.2 Are policies 2 and 3, setting out permitted levels of ground floor uses in **Primary Frontages** and **Secondary Frontages** respectively, justified and effective?

Commentary:

- (i) **OWBC** states that too high a percentage of non-A1 uses (based on frontage lengths) will compromise the centres' retail function by diluting the supply of retail floor space. The evidence shows that the policy – already in the saved local plan – has been successful in keeping the provision of retail use high within the two town centres. The percentages are lower in Oadby to allow for its more pronounced restaurant and café culture.
- (ii) **OTCA** considers that there is no justification for reducing the proportion of A1 retail units within Oadby primary frontages from 70% in the saved local plan to 65% in the AAP. This is in conflict with the *Core Strategy*, and is unsound. **OTCA Suggested**

**change** – reinstate 70% target for A1 use in primary frontages throughout the borough.

- 5.3 Is policy 9, dealing with **hot food takeaways**, justified and effective? In particular, how is 'cumulative effect' to be determined and how will the effect of impacts such as noise, litter, smell and opening hours be assessed?

Commentary:

- (i) **OWBC** considers that hot food takeaways can add to the variety of uses and contribute to both the daytime and evening economies, but there can be detrimental impacts if not managed properly, and the policy sets out the appropriate guidelines.

- 5.4 Is policy 10, dealing with **taxis** justified and effective? In particular, how will proximity to the core of the town be assessed, and how is the core defined? Would there be any provision for taxi waiting areas in Oadby?

Commentary:

- (i) **OWBC** explains that the criteria based policy seeks to accommodate taxis whilst preventing negative impacts, especially in relation to residential areas.

- 5.5 Is policy 11, covering the **public realm**, justified and effective? Should the policy make reference to the use of **sustainable urban drainage systems**, as suggested by the Environment Agency?

Commentary:

- (i) **OWBC** states that it is a generic policy, which should be read in conjunction with its public realm SPD. **Council suggested change** – refer to public realm SPD in supporting text to policy 11.
- (ii) **Environment Agency (EA)** suggests inclusion of text in policy 11 to make specific reference to SUDS in relation to public realm improvements. **Council suggested change** – EA wording in explanatory text to refer to SUDS schemes within public realm improvements.

- 5.6 Are policies 4 and 5, covering proposals for development within the town centre boundary and within **other areas within the AAP boundary** respectively, justified and effective? Why have the SA recommendations aimed at avoiding or offsetting potential impacts on green spaces and biodiversity been omitted from policy 4?

Commentary:

- (i) **OWBC** states that this has been largely covered under its response to matter 5.1. If it is considered necessary to take into account potential impacts on green spaces and biodiversity, supportive text could be added to policies 4 and 5. **Council suggested change** – explanatory text to policies 4 and 5 to cover the need for an ecological survey, and measures to increase amount of natural green space where appropriate.

- 5.7 Are policies 6, 7 and 8, dealing with **shopfronts, security shutters and use of upper floors** respectively, justified and effective?

Commentary:

- (i) **OWBC** considers that the aspects covered in this policy are important to the streetscene and that a criteria-based approach is appropriate.
- (ii) **OTCA** considers that the policy objective of bringing into use existing upper floors of town centre properties would be ineffective and unsound because no targets are set, no active policy proposals and other regulations prevent the achievement of the policy anyway. Very little upper floor conversions have taken place, and a positive strategy of grants would make the policy effective. Parking standards would also need to be relaxed. **OTCA Suggested changes** – policy 8 should include a target of 40 non-family dwelling units, with positive proposals to help achieve this target, exemptions from parking restrictions and development levies.



- 5.8 Is policy 12, covering the **transport and movement**, justified and effective? Has the potential for public transport been realised? Should the plan provide more detailed direction in relation to the location of new and improved bus waiting facilities?

Commentary:

- (i) **OWBC** considers that the policy encourages sustainable modes of transport, and by illustrating indicative areas where bus facilities can be provided strikes a balance and gives the necessary flexibility.
- (ii) **LCC** – HO considers that the AAP has addressed the issues arising from the audit of bus infrastructure in Wigston and supports the AAP's recognition of the need for cycle parking provision.

## **Matter 6 – Implementation and monitoring (Appendices C and D)**

- 6.1 Are the **key infrastructure providers** signed up to the Local Infrastructure Plan (LIP) in Appendix D? (There is support for the LIP from a housing developer.)

Commentary:

- (i) **OWBC** states that both public and private sector partners are committed to the content of the AAP's Local Infrastructure Plan (LIP) and are annually involved in the review of the Borough Council's LIP via the Local Delivery Partnership. The local bus company, Arriva, supports proposals to upgrade public transport facilities on Leicester Road in Wigston, and are discussing a new public transport facility on Bull Head Street, Wigston.

- 6.2 Are there any **showstoppers** in the Local Infrastructure Plan?

Commentary:

- (i) **OWBC** considers that there are several factors which determine delivery of the town centre proposals, including commercial interests, economic growth, site constraints, development costs, private and public sector investment availability. But ownership of key sites is seen as a critical factor. Car parking/access and public realm issues are seen as determining factors. The Council is therefore of the view that there are no showstoppers and therefore no unachievable projects.

- 6.3 What is the **critical path** for securing the effectiveness of delivery of the AAP?

Commentary:

- (i) **OWBC** states that the Delivery Strategy shows the broad anticipated order of project delivery in each town, although a flexible approach will be taken in response to opportunities that may arise, subject to car parking and access issues being resolved and housing implementation keeping pace with the *Core Strategy*.

- 6.4 Is the high number of phase 1/2 schemes indicative of lack of confidence, uncertainty or lack of realism in the plan? **A situation update from the Council is required on phasing and implementation in both town centres, in order to establish clear priorities in relation to resources and the phasing of retail and commercial development, car parking and improvements to pedestrian movement and the public realm. [Phase 1 is 1-5 years (2011/12-2015/16); phase 2 is 6-10 years (2016/17-2020/21); and phase 3 is 11-15 years (2021/22-2025/26).]**

Commentary:

- (i) **OWBC** has suggested changes to provide more certainty to the phasing of the infrastructure elements that will support the overall delivery of the AAP in both towns. **Council suggested change** – amendments to the Local Infrastructure Plan in Appendix D of the AAP to achieve this greater measure of certainty. Some longer term projects run through more than one phase, eg public realm works. The Council, in partnership with LCC, has submitted successful expressions of interest for ERDF funding for phase 1 public realm investment in both town centres.

The Council's situation update explains that the phasing plans are set out in Appendix C and the framework for delivery is set out in Appendix D of the AAP. In summary, the phasing priorities for **Wigston town centre** are:

**Phase 1 project delivery**

- Car parking/retailing – Burgess Junction
- Begin Long Lanes residential and retail/leisure development Paddock Street/Bell Street
- 1st phase public realm improvements – Bell Street

**Phase 1 infrastructure delivery**

- MSCP Junction Road
- Junction improvements Paddock St/Bull Head St, to release residential development (150 units) on Long Lanes site
- Improvements to local education facilities
- Public realm/signage improvements

**Phase 2 project delivery**

- Public realm improvements to Bell St/ The Lanes pedestrian network
- Office development fronting Junction Road
- Public realm improvements – Leicester Rd and Frederick St

**Phase 2 infrastructure delivery**

- Continue upgrading public realm/signage
- Improve bus shelters
- Carriageway/junction improvements on western edge of town centre

**Phase 3 project delivery**

- New office development on Frederick Street

**Phase 3 infrastructure delivery**

- New public transport facility on Bull Head St

**Other infrastructure delivery**

- Direction of Growth housing/employment land development is scheduled to begin in 2017; developer contributions from this project will kick-start some town centre projects, including junction improvements at Leicester Rd/Welford Rd/Moat St/Newton Lane; at Station Rd/Long St/Moat St/ roundabout improvements to north-east of town on Bull Head St

The phasing priorities for **Oadby town centre** are:

**Phase 1 project delivery**

- Brooksby Square – to include residential development (at least 35 apartments); refurbish office block on South Street – retail and commercial opportunities)

**Phase 1 infrastructure delivery**

- Refurbishment of East Street car park/ shared use public square
- Carriageway improvements – South St/The Parade and Chestnut Ave/The Parade
- Bus shelter improvements/cycle parking on The Parade
- Public realm/signage improvements

**Phase 2 project delivery**

- Lead work in Baxter's Place – development of new retail units with commercial uses on upper floors; and new community use building

**Phase 2 infrastructure delivery**

- Sandhurst St dual storey car park
- Continue town centre public realm/signage upgrading

**Phase 3 project delivery**

- Mixed use development for The Precinct (up to 40 dwellings)
- Refurbishing existing retail units on Chestnut Avenue

**Phase 3 infrastructure delivery**

- Improvements to local education facilities

- (ii) **OTCA** considers that the phasing is so ambiguous about the time scales that it calls into question the effectiveness of the AAP. Baxter's Place should be scaled down and implemented as soon as possible.

**Inspector's comments: These comments should be read in the context of matters 6.1 to 6.7.** The Delivery Strategy, which the Council has commissioned from independent consultants, points to significant funding gaps in relation to the implementation of the main schemes in Oadby and one of the main schemes in Wigston. On the face of it, these funding gaps threaten to undermine the soundness of the AAP. The pursuit of major financially challenged redevelopment schemes in both town centres at broadly the same time would appear to present enormous delivery challenges to the Council, especially in relation to Oadby.



It will be necessary at the Hearings to examine a number a key considerations. These include: (1) whether the changes required (set out in the sensitivity analysis, within the two parts of the Delivery Strategy) to turn the schemes from deficit to surplus are themselves realistic; (2) whether other factors, such as additional sources of revenue, stand a realistic chance of enabling scheme delivery in accordance with the AAP; (3) whether the phasing of both town centres in tandem is overambitious; (4) how far the Council has managed to discuss/agree partnership details with prospective developers, given that the Delivery Strategy advises that this should be secured within 2011/2012; and (5) whether the anticipated economic situation, particularly over the next five years, justifies proposals at the level postulated in the AAP.

- 6.5 How realistic is implementation of the **Burgess Junction multi-storey car park** (£32.6 million) within phases 1/2? Or are all these schemes programmed to start in phase 1 and then continue into subsequent phases?

Commentary:

- (i) **OWBC** states that the Burgess Junction MSCP is programmed for delivery in phase 1, and is reliant on attracting a suitable development partner; the £32.6 million applies to the overall build costs for Wigston town centre and not solely the cost of the MSCP. The Council has deliberately chosen not to establish partnerships until the AAP has been adopted, in order to provide an element of certainty. The Council's Economic Development Team has a proven track record of scheme delivery.

- 6.6 What is the cost of the **Town Square** and who will pay?

Commentary:

- (i) **OWBC** states that the town squares are included in the overall costs but would be approximately £100,000 each. Subsequent development briefs will provide greater detail, and will be delivered by partnership working.
- (ii) **TMC** considers that the Council's Delivery Strategy (August 2011) highlights a number of concerns about the delivery of the Brooksby Square proposals, which TMC shares. There is a projected loss of over £2 million, making the scheme unviable, whilst the Council's suggested changes to turn the scheme into profit (increase rental rent; increase in residential values; giving the land to the developers) are unrealistic; whilst S106 Agreements may be difficult to secure. The *Core Strategy* policy 4 calls for innovative schemes for public parking in Oadby; the AAP does not do this.
- (iii) **OTCA** suggests that there is a danger that the phasing proposals would reduce parking spaces in the short term, unless the Brooksby Square proposals followed the Baxter's Place proposed redevelopment.

- 6.7 Which schemes are likely to require **compulsory purchase orders** (CPOs) and/or **Section 106 contributions**?

Commentary:

- (i) **OWBC** considers that large scale use of CPO powers will not be required as the bulk of the project land is already owned by the Council.
- (ii) **LCC – HO** states that both the Council and highway authority will use S106/S278 agreements to fund off-site works where new or improved infrastructure is required to address the impacts of town centre development proposals. The Council needs to have a clear and transparent system in place to secure contributions towards the necessary transport infrastructure.

- 6.8 Should provision for **policing** be included in the LIP, based on developer contributions?

Commentary:

- (i) **OWBC** considers that policing needs are appropriately considered through its Developer Contributions SPD.
- (ii) **Leicestershire Constabulary** considers that in view of the concentration of crime in the town centres, the plan's emphasis on the evening economy and population growth, provision for policing should be made in the AAP's infrastructure plans to be funded by developer contributions. The current omission in the AAP compromises its soundness.

- 6.9 How will the **monitoring** arrangements work? Should Appendix E include reference to changing crime rates, as suggested by the police?  
Commentary:  
(i) **OWBC** consider that the monitoring arrangements could be explained more fully in the AAP. **Council suggested change** – additional statement in Appendix G to include references to the Annual Monitoring Report and partnership working.
- 6.10 When is it envisaged that a **CIL** will be part of the LDF?  
Commentary:  
(i) **OWBC** envisages being in a position to determine their approach to CIL following an assessment by consultants, by July 2012.
- 6.11 Appendix G, the **monitoring framework**, is repetitive and could be simplified; why does it need to include references to plan objectives?  
Commentary:  
(i) **OWBC** considers that this format enables the monitoring of the AAP's objectives to be consistent with the approach found sound by the *Core Strategy* Inspector.
- 6.12 What is the status of the **master plans** in the AAP (Pages 38 and 63)? Is the **Proposals Map** sufficiently detailed and clear to provide a site-specific framework for development over the plan period?  
Commentary:  
(i) **OWBC** states that the master plans do not in themselves form policy.

Mike Fox:  
1 June 2012