



**Borough of Oadby and Wigston
Local Plan 2020 – 2041**

**Statement of Consultation
Preferred Options (Regulation 18B)**

December 2024

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1. INTRODUCTION AND CONTEXT

- 1.1 This Statement of Consultation has been published to take account of the representations that were received as part of the period of public consultation on the Borough of Oadby and Wigston's emerging draft Local Plan Preferred Options (Regulation 18B) documents (and the accompanying Sustainability Appraisal Scoping Report) between midday Wednesday, 2 April 2024 and midday Wednesday, 15 May 2024.
- 1.2 It sets out how Oadby and Wigston Borough Council (the Council) has undertaken community consultation and stakeholder engagement throughout the preparation of the Council's emerging draft Local Plan (to date). It identifies the consultation stages that have and which are still to be undertaken and outlines who has been consulted and how they were consulted.
- 1.3 This document also provides a summary of the main issues raised and explains how these issues are to be addressed and how they continue to inform the preparation of the emerging draft Local Plan (2020-2041).

Why is this Document needed?

- 1.4 Paragraph 15 and 16 of the of the National Planning Policy Framework (2023) sets out the Government's principles for community engagement;

'15. The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

16. Plans should ... c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees'.

- 1.5 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'.*

- 1.6 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'.*

Relationship with the Statement of Community Involvement

- 1.7 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 2024. 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.
- 1.8 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.

Duty to Co-operate

- 1.9 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.
- 1.10 The Council is required to cooperate with; neighbouring local authorities; county councils; and the following (statutory) organisations:
- The Environment Agency
 - Historic England
 - Natural England
 - Homes England
 - Integrated Care Systems (formerly Clinical Commissioning Groups)
 - The Office of Rail and Road Regulation
 - National Highways
 - Local highway authorities
 - The Leicester and Leicestershire Enterprise Partnership
 - The Leicestershire Local Nature Partnership
- 1.11 Partnership working has and will continue to be a key element in the preparation of this Local Plan. The Council has and will continue to collaborate and co-operate 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 will be developed at the latter stages of Plan production and should be read in conjunction with later versions of the Statement of Consultation.

Consultation Stages to Date

- 1.12 The current Borough of Oadby and Wigston Local Plan was adopted in April 2019 and the Council are in the process of undertaking a Local Plan Update. The Council has recognised 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 to date 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 emerging draft Local Plan.
- 1.13 The initial consultation exercise for the new Local Plan was the Call for Sites consultation that took place between September 2020 and November 2020. The sites submitted through this first stage of consultation were published alongside the Regulation 18A Issues and Options (Key Challenges) consultation document and Sustainability Appraisal Scoping Report between August and September 2021, alongside which, a further formal Call for Sites consultation was also carried out. The Regulation 18B Preferred Options consultation document (and the accompanying Sustainability Appraisal Scoping Report) were consulted upon between April 2024 and May 2024, alongside which, a further formal Call for Sites consultation was also carried out.
- 1.14 Table 1 below shows the key consultation stages that have been undertaken in the preparation of the Local Plan to date.

Table 1: Key Consultation Stages in Plan Preparation (to date)

Stage in Local Plan	Date
1. Local Plan Consultation – Initial Call for Sites	Friday, 25 September 2020 to Friday, 20 November 2020
2. Local Plan Consultation – Regulation 18A Issues and Options (Key Challenges); Sustainability Appraisal Scoping Report; and, Further Call for Sites	Friday, 3 September 2021 to Friday, 29 October 2021
3. Local Plan Consultation – Regulation 18B Preferred Options; Sustainability Appraisal Scoping Report; and, Further Call for Sites	Wednesday, 2 April 2024 to Wednesday, 15 May 2024

- 1.15 This Statement of Consultation outlines who the Borough Council consulted and how the Regulation 18B Preferred Options consultation was undertaken. It also summarises the main issues raised in the consultation responses and how they will help to inform the preparation of the Regulation 19 Pre-Submission Consultation Draft. This Statement is supported by a comprehensive appendix highlighting the comments received at the Regulation 18B Preferred Options consultation stage, as well as the Council’s response to those comments received.

2. REGULATION 18B PREFERRED OPTIONS LOCAL PLAN CONSULTATION

Consultation Dates: Wednesday, 2 April 2024 to Wednesday, 15 May 2024.

- 2.1 In accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2017, this period of initial consultation gave the Council the opportunity to identify the scope and broad content of its emerging draft Local Plan. It has provided an opportunity to seek the views, at an early stage in the process, from a wide range of interested parties and stakeholders, as well as to allow early engagement and collaboration, to promote transparency from the outset.
- 2.2 This stage of the Local Plan preparation process (Regulation 18B) was very much focused on identifying the preferred options that may exist within the Borough area over the next Plan period, and how the Local Plan will respond to these. The Local Plan Preferred Options consultation document was made up eleven chapters, containing 37 draft Policies, as well as Appendix 1, which contained all Site Options received at that point via the Call for Sites consultations.
- 2.3 To ensure that local communities, local businesses and other interested stakeholders help shape the future of the Borough, the Council encouraged comments and feedback on any or all relevant documents as part of the consultation.
- 2.4 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 preferred options 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.
- 2.5 National planning and guidance is very clear, in that Local Authority areas should have both strategic and non-strategic planning policies. It goes on to state that Local Plans should be explicit in which policies are strategic and which are not. In terms of non-strategic policies, the NPPF suggests that these policies should be used to set out more detail on specific topic areas, for example, design principles, conserving local heritage and ensuring there is plenty of open space areas for community use. They are in essence more localised development management policies.

Who was invited at this stage and how

- 2.6 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) A press release was issued advising of the Issues and Options 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.
 - c) Paper reference copies of the consultation documentation were made available throughout the period of the consultation, to view at:
 - Brocks Hill Country Park Visitor Centre, Oadby
 - Oadby Library
 - Wigston Library
 - South Wigston Library
 - d) 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 copies of the consultation documentation.
 - e) The Council’s social media platforms were also utilised to provide the community with web links and details about the consultation including consultation dates and where further information could be sought as well as links to view copies of the consultation documentation.
 - f) A member of the Planning Policy Team was also available in-person (by pre-arranged appointment only) at the Brocks Hill Council Offices, Washbrook Lane, Oadby, LE2 5JJ between 10am and 4pm on Wednesday 10 April, Wednesday 17 April, Wednesday 24 April, Wednesday 1 May, and Wednesday 8 May, 2024.
 - g) 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:

Table 2: Regulation 18B Preferred Options Consultation Exhibitions

Venue	Date
Wigston Leisure Centre, Wigston	Tuesday 9 April 2024, 12pm-2pm
Brocks Hill, Oadby	Wednesday 10 April 2024, 12pm-2pm
Blaby Road Park pavilion, South Wigston	Thursday 11 April 2024, 12pm-2pm
Parklands Leisure Centre, Oadby (In reception)	Wednesday 17 April 2024, 5pm-7pm
Blaby Road Park pavilion, South Wigston	Thursday 18 April 2024, 12pm-2pm
Wigston Town Centre, Bell Street / Leicester Road (Next to the digital sign, outside Loros)	Saturday 20 April 2024, 11am-2pm
Oadby Town Centre, The Parade (Next to the digital sign)	Saturday 27 April 2024, 11am-2pm

What were the main comments raised by consultees?

2.7 Overall, approximately 200 submissions were sent into the Council regarding the Regulation 18B Preferred Options Local Plan Consultation documentation, as well as on

the Sustainability Appraisal Scoping Report. Those who responded to the consultation comprised of the development industry, planning consultants, public bodies, statutory organisations, local bodies and action groups and the general public. A total of 7 public consultation exhibitions were held from which the Council's Planning Policy Officer's spoke to and recorded comments from at least 125 people throughout the exhibitions.

- 2.8 Although outside of the formal consultation period, Officers also attended three residents' forums. Some of these may have been people who came to one of the consultation events referred to above or would have attended the forum regardless of the Local Plan consultation being on the Agenda, so these are not necessarily 'new' consultation responders.
- 2.9 The key topics and issues that stakeholders commented on are summarised below in Table 3, together with a general response.

Table 3: Analysis of Comments from Local Residents at Consultation Exhibitions and Forums

Comment	Response
Lack of existing infrastructure	Cannot use planning contributions (S106) to rectify past shortcomings. Levels of investment in current services a matter for Central Government/County Council/Borough Council moving forwards.
Inability to cope with future growth	Council still gathering evidence on level of need going forward, do not yet have identified preferred sites have not yet presented developers with any requirements nor assessed the viability implications of these requirements on sites.
Loss of countryside / green wedge	Council cannot control which sites landowners/developers choose to put forward for development. Council can, and will, assess sites for their suitability and then determine which sites are then carried forward as potential allocations. Not all of a site will be developed for housing, typically 40-50% of a site is developed for housing with parking, play space, other infrastructure that reflect policy requirements, taking up rest of site. Whilst some loss of green space is inevitable it will not be complete loss.
Impact on existing residents in Oadby area from impact of flooding from further development	Council is working with County Council as Lead Local Flood Authority and Environment Agency to rectify identified problems. If sites come forward, can use current evidence to control locations and how the form of development can mitigate water issues.
Lack of brownfield development	Council cannot control which sites landowners/developers choose to put forward for development. At this stage the development of all the identified brownfield sites would deliver circa 200 dwellings, given level of identified need greenfield development will be inevitable.
Taking City of Leicester's growth	Under the regulations currently in force there is a duty to cooperate between authorities.

Comment	Response
	Evidence that Leicester City cannot accommodate growth to be tested at their Plan Inquiry, OWBC contribution may change depending on outcome of LCC inquiry and / or any further changes to Government Policy.
Poor consultation events (there should be more publicity, more events, different locations etc)	None of these comments relate to the plan itself but do raise suggestions that could be implemented for next round of public consultation.
More affordable housing required	Plan does set out requirements for more affordable housing but this still to be tested for viability.
More Lifetime Homes required	Plan does set out requirements for more lifetime homes but this still to be tested for viability.
More dementia friendly housing required	Plan does set out requirements for more dementia friendly homes but this still to be tested for viability.
Parking Charges in the town centres viewed as excessive	Not an issue for the Local Plan.

- 2.10 Topics and more details issues raised by the development industry and key stakeholders is set out in the Appendices. A comprehensive set of representations received during the Regulation 18B Preferred Options Consultation, together with the Council's Officer responses has been incorporated.

How will the key issues raised be addressed in the emerging Pre-Submission Draft Local Plan?

- 2.11 As set out in Appendix A, a plethora of representations were received as part of the Regulation 18B Preferred Options Local Plan Consultation, alongside the Sustainability Appraisal Scoping Report. In addition, the Council also received additional site submissions as part of the further Call for Sites exercise, following on from the two previous Call for Sites consultations in 2020 and 2021.
- 2.12 The emerging draft Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, Policy and Guidance. The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the emerging draft Local Plan and by doing so, these discussions can begin to take place. Local planning authorities in the Housing Market Area (HMA) have mechanisms in place that enable joint working and addressing such matters under the Duty to Co-operate and regular reviews of a Statement of Common Ground.
- 2.13 All sites received to date via the Call for Sites exercises in 2020, 2021 and 2024 will also be taken into account accordingly. The Council's evidence gathering at both a strategic and local level will inform policies related to growth, including that related to the consideration and assessment of specific sites put forward for new growth opportunities.
- 2.14 The Council would like to thank everyone who has taken the time to read through the Preferred Options documents and submitted comments and feedback. Each comment and each bit of feedback that was sent into the Council is helping to shape the future of the Borough area. The specific recommendations to strengthen and improve the Plan and Sustainability Appraisal will be taken into consideration accordingly as the preparation of the emerging draft Local Plan continues to progress.

APPENDIX 1 – DEVELOPMENT INDUSTRY REPRESENTATIONS (WITH OFFICER RESPONSES)

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General Comments

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
<p>Annington Management Limited</p> <p>14th May 2024</p>	<p>Local Green Spaces</p>	<p>Annington write in connection the New Oadby and Wigston Local plan as owner of a number of parcels of land identified as “Local Green Spaces” in the adopted Local Plan Proposals Map as shown on the attached plan in green.</p> <p>The Local Plan Regulation 18B Site Options identifies a range of site sizes including the 4-8 homes proposed allocation ref OAD/004 at Land North of Manor Road, Oadby. Given this modest threshold for site identification in the plan, Annington make representation that some of the Local Green Spaces on the attached plan can serve to meet housing needs. To do so balances protecting some green areas of particular importance against wider planning policy objectives such as the fundamental need to meet housing needs in sustainable locations within the built-up areas of the District.</p> <p>Annington would be very pleased to engage with the Council on combining both key objectives of:</p> <ol style="list-style-type: none"> 1. Providing a modest number of homes in the least sensitive parts of the above Local Green Spaces 2. Providing long term protection for the retained Local Green Spaces via Section 106 Agreement, which is not currently in place. 	<p>Noted.</p> <p>No change. NPPF is clear a LGS designation should endure beyond the plan period and only altered in very special circumstances. Have identified sufficient residential sites.</p>
<p>Mulberry Land on behalf of Mrs B Walker</p>	<p>Appendix 1 – Regulation 18B Site</p>	<p>It is noted that of the 32 site Options, 5 of those (OAD/012, OAD/013, WIG/012, WIG/013, WIG/014) are sites which were allocated within the 2019 Local Plan. To date there</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
<p>(Landowner) 15th May 2024</p>	<p>Options</p>	<p>appears to have been no planning activity to indicate these sites coming forward and there are no details within the Call for Sites: Sites Collation and Initial Assessment regarding timeframes for delivery. There are some complexities with projects of this nature and in particular the number of landowners / existing lease arrangements and need for collaboration. It is reasonable to request that if the Council is to continue to retain such allocations and provide any reliance upon the delivery of homes, additional information will be required to consider if the sites are deliverable and where they should be considered in terms of trajectory.</p> <p>Paragraph 16 b) of the NPPF states Plans should be prepared positively, in a way that is aspirational but deliverable, and land ownership and availability should be considered a key aspect of this test.</p> <p>Of the 32 site options, as noted by the Council several sites are presented multiple times, for different development capacities. Where a combination of sites are to be considered, evidence will be required as to the joint working and collaboration arrangements between land owners and promoters in order for the Council to consider the implications for site delivery.</p> <p>With reference to the land which has been put forward at Glen Gorse Golf Club, (OAD/008, O&W/001, part of O&W/002) the council should satisfy themselves that the comments put forward as call for sites submission are accurate. The submission confirms that the Landowners are fully committed to the delivery of residential development on the Site and there are no known viability issues that would prevent the delivery of the site. It is</p>	<p>of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>however public knowledge that in January 2020 the club membership voted against the committee's proposal to develop the club. Without the support of the members this it should not be considered available, and some clarity should be provided to the Council on this point before they consider the site any further.</p>	
<p>Nigel Reeves Planning & Urban Design Ltd on behalf of Landowner at Ellis Farm, Welford Road, Kilby Bridge</p>	<p>Appendix 1 – Regulation 18B Site Options</p>	<p>Introduction</p> <p>The adopted Oadby & Wigston Local Plan (2019) allocated land around the Kilby Bridge settlement for proposed housing and associated commercial/waterside development. This including land on the east side of Welford Road, which owned by my clients Mr & Mrs Mortimer.</p> <p>The purpose of this representation is to support the maintenance of this allocation in the emerging Local Plan, which is currently at the Regulation 18b stage in advance of the publication of the Pre-Submission Draft Local Plan (Regulation 19) in Spring 2025. Further initial design work has also been undertaken on this land to demonstrate that this land can be developed in a reasonable timeframe, and well within the end date of the new Local Plan.</p> <p>Adopted Oadby & Wigston Local Plan (2019)</p> <p>The adopted Local Plan contains specific policies relating to the Kilby Bridge Settlement, which are set out in the extract from the Proposal map and Policy 17.</p> <p>Policy 17 in the adopted Local Plan allocates up to 40 dwellings within the total area covered by the Kilby Bridge settlement boundary. This policy is set out below:</p>	<p>The Council is in receipt of the following documents:</p> <ul style="list-style-type: none"> - Indicative Development Layout (May 2024) <p>The accompanying supporting document received in addition to the formal representations have been reviewed in detail.</p> <p>The Council recognises that the Kilby Bridge Settlement Envelope designation continues to have a role to play as the rural 'gateway' into the southernmost part of the Borough.</p> <p>Recognising the role of the Borough strategically, the designation allows for flexibility and could perform a useful role in delivering the strategic objectives of the Strategic Growth Plan in the future.</p> <p>Therefore, the Kilby Bridge Settlement Envelope Policy designation has been included and rolled forward in the Regulation 19 Pre-Submission Draft Local Plan.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p><i>Policy 17 Kilby Bridge Settlement Envelope</i></p> <p><i>The Council will in principle support small scale development proposals within the defined Settlement Envelope of Kilby Bridge as shown on the Council's Adopted Policies Map. Any residential development proposed within the defined envelope must be small scale (up to 40 new additional homes across the whole settlement envelope) and delivered at a minimum of 30 dwellings per hectare. All development proposals will need to take account of the rural and historic landscape, as well as the distinctive character of the Grand Union Canal Conservation Area and views across open countryside. All proposals must give careful consideration to the proposed scale of the development and in particular, take account of the impact that any scheme may have upon this rural 'gateway' into the Borough.</i></p> <p><i>The key objectives of the Kilby Bridge Settlement Envelope are to:</i></p> <ul style="list-style-type: none"> <i>- Maintain the open, attractive, and rural setting;</i> <i>- Retain and enhance public access to the Grand Union Canal; River Sence; and the Kilby Foxton Site of Special Scientific Interest (SSSI);</i> <i>- Conserve and enhance the Grand Union Canal Conservation Area;</i> <i>- Deliver small scale sustainable residential development(s) that will provide a range of housing types, unit sizes and tenures whilst retaining the distinctive</i> 	

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p><i>landscape and historic character through designing attractive schemes that will complement this gateway location;</i></p> <ul style="list-style-type: none"> - <i>Protect the existing local economy, as well as to enhance it through delivering small scale outdoor leisure, recreation and tourism development;</i> - <i>Give consideration to the incorporation of small scale ‘starter’ units for suitable rural businesses; and</i> - <i>Provide publicly accessible open space on land to the east of the settlement boundary, between the railway line to the north, Grand Union Canal to the south and the SSSI to the east.</i> <p><i>The Council will encourage early engagement with regards to any potential scheme, together with the submission of a detailed masterplan illustrating the proposed scale, design, layout, mix of dwellings, tenure and an appreciation for how the wider issues including transport, accessibility and mitigation of potential impacts will be taken into account. All development proposals within Kilby Bridge Settlement Envelope will need to conform to other relevant policies within this Plan.</i></p> <p>Regulation 18b Consultation by Oadby & Wigston BC - New Oadby & Wigston Local Plan (2024 – 2041)</p> <p>This representation supports the retention of the existing housing/commercial allocation around the Kilby Bridge Settlement, to be taken forward into the new submission Local Plan document. In addition, the allocation could be widened further to the east of the current settlement</p>	

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		<p>boundary limits, to allow for the provision of new public open space to connect across the site to the SSSI further to the east, as well as a new Sustainable Urban Drainage (SUDs) Network to serve the new development.</p> <p>So far no formal proposals for the land at Ellis Farm have been tabled, as the client has been trying to obtain planning permission at other sites that he owns as a priority. It is intended that 2-3 Self-Build properties will be built on a small part of the land, including the land immediately adjacent to the existing stable buildings, to allow the applicant and his family to downsize from some of the existing houses that face onto Welford Rd.</p> <p>The rest of the site will be sold to a developer for future house-building, but with a central area of greenspace (possibly including a small village green) to separate the self-build properties to the south from the new houses to the north. This will also allow a green connection through the site to the land further to the east where the open space containing the SUDs and the SSSI is located. Significant native planting, wildlife habitats and the required Biodiversity Net Gain (BNG) can also be achieved on this land.</p> <p>Access to the site is currently obtained via an access driveway which runs along the very northern site boundary and then turns southwards into the site. This serves the rear of 5no existing dwellings fronting onto the east side of Welford Rd plus the existing brick stables adjacent to Ellis farm and the additional stable building further to the east. Therefore this access already serves a significant amount of development at Ellis Farm, particularly if the stables which once housed a busy livery activity, were brought</p>	

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		<p>back into use.</p> <p>Alternative access options to the site are also currently being considered, to improve the existing access arrangements to the site. One option is to demolish the owners existing house, which would then provide a more direct access into the heart of the site.</p> <p>In addition any new development, particularly on the southern portion of the site will seek to ensure that no harm to the existing heritage assets in the locality results – notably the character of the Kilby Bridge Conservation Area and the existing canal side development alongside the Grand Union Canal. This will be achieved by good urban design and placemaking and in particular how the new buildings reflect and define the open spaces that they face onto.</p> <p>The main housing site will have an average density of 30 dph to comply with Policy 17 above. However the self-build will be built at a slightly lower density to reflect the position closer to the core of built extents of the conservation area as well as the canal and the need for a zone to be kept clear of development alongside the SSSI where it runs along the north side of the canal, as well as ensuring that an appropriate lower density development is provided on parts of the site that will be more visible from the countryside.</p> <p>Development Timescale:</p> <p>The site is already allocated for development, so a planning application for development could proceed in the very near future.</p>	

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		<p>Assuming a time period for obtaining planning permission, (including any required s106 agreement) of 18-24 months, development could reasonable expected to start on site by Summer 2026. This may be brought forward if the timescale for obtaining permission is reduced.</p> <p>Conclusion:</p> <p>For the reasons set out in the representation above the continued allocation of the site at Kilby Bridge settlement for development should be supported. The development boundary could be altered if it was thought that the additional open space/SUDs/landscaped areas have more resonance with the new development, if this is considered to be appropriate.</p> <p>Further sustainable development initiatives mean that the land between the built development and the SSSI can become a positive element for the public benefit of the local residents providing additional recreational opportunities.</p>	
<p>Pegasus Group on behalf of L&Q Estates</p> <p>15th May 2024</p>	<p>Appendix 1 – Regulation 18B Site Options</p>	<p>These representations are submitted by Pegasus Group on behalf of L&Q Estates Ltd in respect of the Oadby and Wigston Local Plan Regulation 18B Consultation.</p> <p>This representation is made in relation to our client’s interests south of Oadby and north of Newton Harcourt, and a proposal for a strategic site (in Harborough District) south east of the Leicester Urban Area, known as Newton Croft. The site is adjacent to Oadby & Wigston Borough, to the west of the A6.</p>	<p>Noted.</p> <p>The Council is in receipt of this Representation and notes the following Appendices:</p> <ul style="list-style-type: none"> - Appendix A: Site Location Plan - Appendix B: Working Draft Concept Masterplan - Appendix C: Introduction to L&Q Estates - Appendix D: Newton Croft Community Interest Company

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		<p>The site is capable of delivering up to 3,500 homes, including: affordable homes, secondary and primary schools, employment, community facilities, sustainable transport options, biodiversity net gain and open space.</p> <p>L&Q Estates have previously met with officers of Oadby and Wigston Borough Council in April 2024 to share the initial plans for the site and highlight the promotion of the site in the emerging Harborough Local Plan.</p> <p>Our client, L&Q Estates, are developers and promoters of residential, commercial & mixed use developments. They will act as master developer for this site, which is in single ownership, and contribute to the legacy planning for the long term sustainability of the development.</p> <p>L&Q Estates have over 60 years of experience in delivering strategic development sites including within Leicestershire. Appendix C provides a fuller introduction to L&Q Estates and explains how they look to tailor each development to meet the unique requirements of each site and location to deliver exceptional quality developments. The remaining Appendices provide an insight into the proposed legacy planning for the site which is explored in more detail as part of these representations. Our clients are keen to work with Oadby and Wigston Borough Council as well as Harborough District Council and Leicestershire County Council on shaping the long term legacy of this development.</p>	<p>This representation relates to a Site that is located entirely outside the administrative area for the Borough of Oadby and Wigston. However, it is recognised that the proposed growth area would adjoin the Borough's boundary and therefore, it is recognised that the growth proposal of this significance would require joint-working with the landowner and agent, the neighbouring Local Planning Authority of Harborough District, as well as with Leicestershire County Council.</p> <p>The Council continues to liaise with all three parties as preparations on the Borough of Oadby and Wigston's Local Plan continues to evolve.</p>
Stantec on behalf of Bloor Homes Limited and	Appendix 1 – Regulation 18B Site Options	Our Clients are promoting land to the south of Newton Lane, Wigston for housing. The land in question is identified edged red ("the Site") on the plan attached at Appendix 1. The Sites location to the south east of	The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option,

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<p>the Pierce Family (Landowners)</p> <p>15th May 2024</p>	<p>New Site Submission</p>	<p>Wigston means it is well positioned to form an appropriate and positive extension to the current Wigston Meadows site (which gained outline approval for up to 650 dwellings in 2023, along with a new local centre, community facilities and primary school in February 2023 – reference: 21/00028/OUT), the current Local Plan allocation (Policy 20 – Wigston Direction for Growth Allocation). There is also an extant reserved matters application for up to 450 dwellings on a site to the north following an outline consent obtained in 2016 (reference: 16/00316/REM). This general area is clearly a location which the Council have found to be a sustainable location for growth given that Wigston is contiguous with Leicester City.</p> <p>The Site comprises agricultural land (Grade 3) covering approximately 31.4 Hectares. It has not been assessed in the Council’s Strategic Housing Land Availability Assessment (SHLAA) previously, however details have recently been submitted through the Call for Sites process so that it can be considered when the SHLAA is next updated.</p> <p>The Concept Masterplan contained at Appendix 2 illustrates one way in which the Site could be developed. It shows a developable area of 17 ha free from flood risk, or designations which may constrain development. Assuming a density of 30-35 dwellings per hectare it is considered the Site could deliver over 500 dwellings. The Masterplan allows for substantial green infrastructure / open space through the proposed development and will significantly increase the quantum of publicly accessible, usable recreational space.</p> <p>It is pertinent to note that there has been a long standing</p>	<p>including this one, have been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>ambition of the council to accommodate housing growth to the south-east of Wigston.</p> <p>In the currently adopted Local Plan (2011 to 2031) Policy 20 sets out the intension of the Council to 'expand the Wigston Direction for Growth Area'. This is to be achieved by 'allocating further land at the WDGA for Phase 2 development'. Given that this adopted policy is now undergoing review through this new Local Plan to 2041 process it would be appropriate for the Council to consider phases beyond 'phase 2'. This would necessitate allocating land for residential development on an eastern trajectory. As Figure 1 shows below (taken from the Adopted Policies Map, April 2019) the council have identified illustrative areas for Phase 3. Our Site is located perfectly to build on this growth direction and contribute a further phase to the WDGA.</p> <p>With regards to this current consultation, we support the Councils proactive and timely approach to reviewing their Local Plan. We wish to work proactively with the Council throughout the Local Plan review process to ensure that the plan accords with Paragraph 35 of the NPPF test of 'soundness' which sets out that plans must be positively prepared, justified, effective and consistent with national policy. It is these 'tests' that we have considered within the subsequent representations which respond to the proposed spatial objectives and policies contained within the Preferred Options Consultation document, with comments made responding to each individual policy most relevant in the case of our site.</p>	
Stantec on behalf of Bloor	Appendix 1 – Regulation	Appendix 1 of the Preferred Options document sets out all of the sites which have been submitted as site options to	

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<p>Homes Limited and the Pierce Family (Landowners)</p> <p>15th May 2024</p>	<p>18B Site Options & Sustainability Report (March 2024)</p>	<p>date.</p> <p>Appendix 1 establishes that, across all of the potential residential sites, there is capacity for approximately 5600 homes. This equates to 266 homes per annum (over the plan period to 2041) which is more than the three growth options set out at point 2.2.5 of the SA (March 2024) and also exceeds the Standard Method requirement by 26 dwellings per annum). However, at this stage none of the sites have been tested. It is very probable that once testing is undertaken a number of the 33 sites (20 of which are solely residential) could be discounted as not being achievable due to viability and sustainability constraints.</p> <p>We caution that the housing capacity number of 5,600 could quickly be eroded down and leave little to no buffer against the housing need. Ensuring that the Council identifies enough sites for allocation which have the cumulative potential to deliver a number of homes which exceeds the housing need, with a sufficient buffer will be important. Particularly in light of the implications of BNG which could take up developable area meaning large strategic sites deliver less homes than anticipated / accounted for in the plan.</p> <p>Although testing of the sites within Appendix 1 has not yet been undertaken, the SA (March 2024) does set out the context for some of the figures derived at this stage. Point B.40 of the SA comments upon the housing need and delivery relating to the currently adopted Local Plan.</p> <p>Between the period 2011 to 2031 a minimum of 148 dwellings per annum are provided. The SA goes on to state that 'Completion figures have been steady over the</p>	<p>The Council will undertake considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, will be considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>last few years, in addition, commitment figures have also been steady, meaning the Council is able to maintain a consistent 5-year supply of new homes' (note 'bold' is our emphasis).</p> <p>In terms of what 'steady' means, the most recent monitoring reports for the Council include the Residential Land Availability 2022/2023 report. This report sets out the net housing completions per year between 2011 and 2023. Bearing in mind that the requirement of the current Local Plan is 148 homes per year the completions across the 2011 to 2023 period averaged 137.6. Point 3.3 of the RLA Report states that the total provision in the borough has been 1,651 which is below the current 1,776 target.</p> <p>However, the Council are confident that this shortfall is to be negated as 'all the Direction for Growth Allocations' have planning permission and are 'delivering at a good pace'.</p> <p>We do acknowledge that in more recent years, since 2019, average housing delivery has been 218 which is significantly higher than the 137.6 average (2011-2018). This has also involved an increase in delivery of affordable homes from an average of 27.8 per year to 118 in the 2022/2023 period. However, this increase in delivery is somewhat skewed due to progress which has been seen on the Direction for Growth Ares (strategic allocations) across the borough.</p> <p>There appears to be a reliance of the Council upon these large schemes coming forward to meet housing need for which delivery of homes has been weighted towards the latter part of the plan period. As part of this plan review,</p>	

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		<p>the Council need to identify:</p> <ul style="list-style-type: none"> - More sites for allocation to ensure there are a range of timescales for delivery (0-5 years, short term, 6-10 years medium term and 11+ years). - Recognise that large (strategic) greenfield allocated sites are likely to become more important and need to come forward, as smaller, brownfield and urban sites become increasingly sparse <p>Our site presents an ideal opportunity to provide more certainty around housing delivery that will meet the boroughs needs over the course of the New Local Plan to 2041. The 500-home capacity site sits to east of the Wigston Meadows and Growth Area allocation, comprises low grade agricultural land and could be phased to deliver homes at a varied timescale and to support and account for delivery of required infrastructure.</p> <p>Point 3.7 of the RLA document reports on the number of homes which are currently 'committed development' within the borough. These commitments account for 1,393 of the housing supply in the borough, a significant number of homes.</p> <p>The term 'committed development' includes sites granted permission subject to a signed S106 and those under construction, which in our view carry less risk in terms of delivery. However, 'committed' also includes 'sites granted planning permission that have not yet commenced'. These sites are of more concern as there is a possibility that delivery may not occur, particularly in light of the shifting economic and political climate.</p>	

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		<p>In these cases, permissions could expire and the timescale for delivery of these sites will be later than accounted for within the Local Plan, if delivered at all. We would encourage the Council to approach this Local Plan review proactively and look to allocate more sites to ensure that housing supply exceeds need as this could help to account for any under delivery on the previous plan.</p> <p>We also advise that, since adoption of the current Local Plan there have been some planning policy changes which have significant implications for developers and could mean many developments are held in abeyance or found to be undeliverable.</p> <p>This could also have implications on the current (2023) 5-year housing land supply of 7.33 to 8.36 years (Oadby & Wigston Housing Implementation Strategy 2023, Page 8).</p> <p>For example, the requirement for mandatory BNG 10% gain on all sites (major from February 2024 and minor from April 2024). As discussed at part 2.8 above, it is not currently clear how the Council will approach BNG, regardless of this detail, it will certainly impact upon the deliverability of many sites weather that be the viability of sites in their entirety or the number of dwellings that can be delivered on sites due to developable area reduction. Again, more sites need to be identified through this New Local Plan consultation and assessed for allocation.</p> <p>With regard to the site options identified, the SA (March 2024) sets out within Table C.1 the 'Assessment Criteria' for the sites. The assessments have made a number of assumptions which feed into the scoring presented for</p>	

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		<p>each site in relation to each sustainability objective.</p> <p>For example, for the 'Housing Provision' objective, it has been assumed that 'All potential residential sites are expected to have positive impact...it is assumed that housing development will incorporate an appropriate proportion of affordable homes'. However, as we have set out in our representations above, unless policies which will impact viability of sites, namely Policy 12 and Policy 8, this assumption is unlikely to be the reality. Many sites will have to underdeliver on affordable homes in order to be viable under the other policy pressures. This reasserts our view that the Council need to 1) reassess policy wording and contributions required, 2) identify more sites for allocation to ensure affordable housing number can be achieved.</p>	
<p>Pegasus Group on behalf of L&Q Estates</p> <p>15th May 2024</p>	<p>General</p>	<p>General Comments</p> <p>Oadby and Wigston lies within the Leicester and Leicestershire Housing Market Area (HMA) and Functional Economic Market Area (FEMA), which both cover the whole of Leicester and Leicestershire. The Leicester and Leicestershire Strategic Growth Plan sets out a strategy for growth and development across the area, over the period until 2050. In line with this jointly prepared plan, the recently signed Statement of Common Ground between the authorities, apportions some of Leicester's unmet housing needs to Oadby and Wigston Borough (52 dwellings per annum).</p> <p>Amount of Housing Growth The draft Local Plan sets out a proposed housing requirement for the Borough of 5,040 dwellings across the</p>	<p>The Leicester and Leicestershire Statement of Common Ground (June 2022) establishes that the agreed position across all of the Authority areas is based upon a clear evidence-based approach, on the back of a long track record of effective joint working on strategic matters. Indeed, all of the Authorities continue to engage on an ongoing basis in this manner.</p> <p>At the time of signing, the Government's standard method for calculating housing need suggested that the Leicester and Leicestershire need was to provide 91,408 homes (5,713 per year, 2020 to 2036). For the Borough of Oadby and Wigston, this figure equated to 188 dwellings per annum.</p>

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		<p>plan period. This is 240 homes a year and is based on the standard methodology Local Housing Need figure of 188 homes a year plus the 52 homes a year of Leicester's unmet need apportioned to the Borough.</p> <p>It is important that the housing requirement set out in the Local Plan reflects the latest information at the point the plan is submitted for Examination. The most recent affordability ratio data was published in March 2024, and this updates the standard method Local Housing Need figure to 198 homes a year. This suggests the total housing requirement should now be based on a minimum of 250 homes a year, taking account of unmet needs. This is a total of 5,250 dwellings over the plan period.</p> <p>In order to meet both the Local Housing Need and Leicester's unmet need, it is acknowledged that Oadby and Wigston Borough Council have some difficult decisions to make in order to deliver enough sites to meet these requirements, decisions which include the potential release of countryside or Green Wedge land.</p> <p>The development of Newton Croft is proposed as an extension site of the edge of the Leicester Urban Area, that would allow for a significant amount of Leicester's unmet need to be met close to the boundary of the city.</p> <p>A strategic site south east of the Leicester Urban Area offers an opportunity to complement the development strategy for Oadby and Wigston Borough, respond positively to the Strategic Growth Plan for Leicester and Leicestershire, direct growth to the most sustainable location of the Leicester Urban Area and create the critical mass to deliver significant positive benefits. The proposed</p>	<p>In addition to that, an agreed approach to redistributing Leicester City's unmet need of 18,700 homes over the plan-period 2020-2036 was also set out, seeing an apportionment of 52 dwelling per annum for Oadby and Wigston Borough Council.</p> <p>The SoCG stated that this was agreed by all Authorities that the these figures are subject to testing through each individual Local Planning Authority's plan making process.</p> <p>It has subsequently been agreed by all Leicester and Leicestershire local authorities that in absence of any evidenced approach to deal with the period 2036-2041, each local authority would roll-forward the apportionment figure of Leicester City's unmet need.</p> <p>Combined, this represented a maximum growth figure of up to 240 dwellings per annum for the Borough of Oadby and Wigston. Over a plan period of 2020 – 2041, this figure represents 5,040 dwellings in the Borough.</p> <p>OWBC has subsequently tested three growth rates (for housing) through emerging evidence over its Plan period of 2020-2041. The lowest growth figure of 188 dpa (the then Standard Method figure); a upper growth figure of 240 dpa (as per the SoCG); and, a median figure of 214 dpa.</p> <p>Taking account of all evidence, the Council is taking forward the upper growth figure of 240 dpa, equating to 5,040 dwellings in total to be provided over the Plan-period of 2020-2041 in the Borough. This growth strategy represents the most appropriate for the</p>

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		<p>development, known as Newton Croft, demonstrates the significant benefits of allocating strategic sites as part of a wider strategy for growth in sustainable locations. These benefits include the delivery of primary and secondary school, a community hub, a transport interchange, strategic green infrastructure and employment floorspace.</p> <p>The delivery of Newton Croft would see Oadby and Wigston Borough well-positioned to benefit from new linkages to be formed between the new development and the existing built form, it would also see the existing population benefit and utilise the proposed services, facilities and infrastructure from which benefits will be generated.</p> <p>A strategic site south east of Leicester would relieve the pressure on the further expansion of Oadby and Wigston and will provide variety and choice in the local market, which is essential in maintaining the supply of homes.</p> <p>Our client's site, Newton Croft, is capable of delivering up to 3,500 homes at the edge of the urban area of Leicester and could start delivering from 2031/32 with up to 1,500 homes built within the plan period based on the number of points of access and sales outlets that can be supported. This would make a significant contribution to significantly boosting the supply of homes and meeting Leicester's unmet housing need.</p> <p>Responding to the Strategic Growth Plan</p> <p>The inclusion of a strategic site south east of the Leicester Urban Area aligns well with the Strategic Growth Plan for Leicester and Leicestershire.</p>	<p>Borough of Oadby and Wigston.</p> <p>The need figure of 240 dpa has been agreed with all other Leicester and Leicestershire authorities and therefore amendments to the growth figure would need to be agreed by all Partners across the County and tested via the Council's evidence to support the New Local Plan.</p> <p>This representation relates to a Site that is located entirely outside the administrative area for the Borough of Oadby and Wigston. However, it is recognised that the proposed growth area would adjoin the Borough's boundary and therefore, it is recognised that the growth proposal of this significance would require joint-working with the landowner and agent, the neighbouring Local Planning Authority of Harborough District, as well as with Leicestershire County Council.</p> <p>The Council continues to liaise with all three parties as preparations on the Borough of Oadby and Wigston's Local Plan continues to evolve.</p>

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		<p>The Strategic Growth Plan highlights the role of the Central City, and the importance of supporting Leicester's continued growth and prosperity. The Growth Plan directs growth to the south and east of Leicester, within Harborough District, over the period up to 2050 to support the City, which is constrained by a tight administrative boundary and a lack of land availability.</p> <p>It also identifies the need to focus growth in major strategic locations to reduce the amount that takes place in existing towns, villages and rural areas. The Strategic Growth Plan sets out a vision that the delivery of the strategic growth areas will be as 21st century garden towns, villages and suburbs and new housing and employment will be planned together with new and improved roads, public transport, schools, health services, local shops and open space.</p> <p>The proposed development at Newton Croft would respond positively to the Strategic Growth Plan, delivering growth to the south east of the Leicester Urban Area over the plan period and beyond as part of a longer term vision for this area and establishing a strategy for subsequent plan periods, as envisaged by the Leicester and Leicestershire authorities.</p> <p>It would provide the opportunity to co-locate homes and jobs, alongside a new secondary and primary schools, community facilities and services, shops and open space. Importantly it provides the opportunity to deliver infrastructure for the benefit of the wider community including a new multi-modal transport hub on the A6 corridor and employment space for small companies</p>	

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		<p>needing space to innovate and grow. All of the identified strategic infrastructure benefits would be accessible to residents of Oadby and Wigston Borough.</p> <p>Focusing Growth in a Sustainable Location</p> <p>The edge of the current urban area of Leicester offers a sustainable location for growth due to the proximity to existing infrastructure and availability of, and access to, services and facilities.</p> <p>The proximity to the urban area means there is access to an extensive range of higher order retail, health, education and cultural services. The site is within active travel distance to Oadby, Wigston and South Wigston; and, is conveniently located to allow bus travel to the wider Leicester Urban Area and towards Market Harborough. There is also access to strategic employment opportunities within the urban area.</p> <p>A strategic development in this location has potential to minimise the need for travel through the provision of local services and facilities within the site, whilst maximising the use of sustainable transport when higher order services or employment are accessed.</p> <p>It also provides the additional important benefit of meeting the housing need arising in Leicester, in a location close to where that need arises. This is a significant social benefit and means existing social networks and support systems can continue to be used and consolidated whilst relieving the current issues of overcrowding and people living in unsuitable accommodation.</p>	

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		<p>The inclusion of strategic sites as part of a wider strategy also reduces the pressure for growth in other less sustainable settlements and further support the ambition for sustainable growth., which is a key of objective of the Local Plan.</p> <p>Creating a Critical Mass</p> <p>Strategic sites create a critical mass which enables the delivery of infrastructure. The proposed Newton Croft development would include the delivery of a secondary school, primary schools, shops, employment, sustainable transport options and a range of community facilities. This ensures as many trips as possible are internalised within the development and reduces significantly the impact of development on the existing infrastructure of the District/Borough, whilst providing additional capacity.</p> <p>The co-location of homes and jobs is a key benefit of larger sites, there is an opportunity to include the scale and type of employment land needed to complement employment opportunities within the Leicester Urban Area, further reducing the need to travel.</p> <p>There is also an opportunity to comprehensively plan the development of a strategic site, consider the best layout to maximise the internalisation of trips, encourage people to use alternatives to the car and create an attractive and healthy place to live.</p> <p>Work has already commenced in relation to Newton Croft to liaise with key stakeholders (including Oadby and Wigston BC, Leicestershire CC and Harborough DC) and understand what infrastructure is needed and how it can</p>	

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		<p>be phased effectively to deliver sustainable development from the outset.</p> <p>The proposed development at Newton Croft will deliver Strategic Green Infrastructure Improvement, a sustainable transport corridor and the provision of educational facilities that will see the support of the existing town centres of Oadby and Wigston, the provision of recreational routes and school places that would be available to residents of the Borough.</p> <p>A sustainable transport corridor is envisaged to consist of improvements to the A6 to improve connections into Leicester, including destinations en route such as Oadby, are also envisaged. This could take the form of reallocating road space on the A6 corridor away from the private car and towards sustainable modes, including bus lanes, bus priority at junctions and significantly improved active travel infrastructure, not only in terms of routes but also complementary measures such as pocket parks and benches to create a better environment for walking, cycling and wheeling.</p> <p>The site has been designed to see the early delivery of key infrastructure. Early phases of the development will be located closest to the boundary of the Leicester Urban Area (Oadby and Wigston BC boundary).</p> <p>Newton Croft - Deliverable sustainable extension to the Leicester Urban Area</p> <p>Our client's site south of Oadby and north of Newton Harcourt, known as Newton Croft offers the unique opportunity to bring forward up to 3,500 homes on a site in</p>	

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		<p>single ownership and under the control of a single promoter, L&Q Estates, a proven master developer.</p> <p>The usual uncertainty around the timescales relating to strategic sites and how much development is deliverable within the plan period is overcome by the simplicity of the landownership arrangements and involvement of a master developer with a proven track record of delivery.</p> <p>The land available is shown in Appendix A and includes the land required to access the A6 transport corridor and achieve multiple access points. There are no significant technical constraints to overcome.</p> <p>The site is in an ideal location to deliver a strategic extension to the Urban Area of Leicester, on a strategic transport corridor, benefiting from and contributing to existing infrastructure and delivering sustainable development.</p> <p>L&Q Estates have given detailed consideration to the programme for delivering the site in conjunction with the Harborough Local Plan. Based on the Local Development Scheme timetable which sees the plan submitted by June 2025, a planning application would be submitted that summer and it is anticipated that it would take two years to determine and a further year to agree a Section 106. This would allow the first reserve matters application to be submitted in 2029, with delivery on site likely to begin in 2031/32.</p> <p>This is a cautious but realistic timetable for a site with a master developer providing serviced plots to the market, benefitting from existing strategic infrastructure of the A6</p>	

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		<p>transport corridor. This ensures there would be a significant contribution to housing numbers through the plan period and that Leicester's unmet needs are addressed close to where they arise in the medium term.</p> <p>A strategy which includes this highly deliverable and unconstrained strategic site in combination with sustainable growth elsewhere in both Oadby and Wigston Borough and Harborough District would ensure local housing needs and Leicester's unmet need is met.</p> <p>Location of Employment Growth</p> <p>Our client recognises the critical importance of co-locating employment space with new homes to support changing working patterns, entrepreneurship and innovation as part of delivering strategic sites. In turn, this delivers wider benefits for sustainable development, reducing car reliance and enabling lower carbon lifestyles.</p> <p>Our client's site south of Oadby, north of Newton Harcourt, known as Newton Croft offers an exciting opportunity to deliver employment infrastructure as well as additional employment land. This would include the provision of flexible innovation space for businesses to test ideas and develop products that they cannot do from home or their current offices. This would be combined with office, co-working, meeting spaces and supporting amenities (e.g. food, drink and leisure).</p> <p>It is proposed that the employment space provided at Newton Croft would focus on providing a facility for small companies for start-up or grow on space. This space would be provided as part of a Hub at the centre of the</p>	

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		<p>development co-locating essential amenities to support the businesses, local residents and the wider area.</p> <p>The Newton Croft Hub would be delivered by L&Q Estates in the same way as other infrastructure such as schools and community facilities. It would be owned and managed by a professionally resourced Community Interest Company established as a legacy vehicle to deliver long term benefits for businesses, the local community, and the wider area. Details of the proposed Newton Croft Community Interest Company are set out in Appendix D.</p> <p>This could include establishing closer links between schools and businesses along the lines seen in Cambridge as part of the Form the Future social enterprise initiative. This initiative involves connecting schools with growing businesses so young people can learn about and prepare for the jobs of the future. Using volunteers from local businesses, they help students develop their enterprise and employability skills, careers awareness, motivation and ambition, building their understanding of the workplace and their network of contacts. The employment offer can be future proofed to enable larger occupiers to lease space if/when the market matures.</p> <p>Opportunities for Oadby and Wigston</p> <p>Our client's site offers a range of opportunities which will provide important benefits and opportunities to Oadby and Wigston. The key opportunities include:</p> <p>Education: Based on initial discussions with Leicestershire County Council, the site would include a Secondary</p>	

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		<p>School to serve the wider community, two 2 Form Entry Primary Schools, one built to be capable of expansion to a 3 Form Entry and one delivered as part of a through school with the secondary provision. This provision would not just serve future residents it will also be beneficial to meet the capacity requirements arising in Oadby and Wigston.</p> <p>Transport: Active travel improvements on Newton Lane and on the A6 corridor to support connectivity between the site and settlements within Oadby & Wigston Borough. Provision of a multi-modal transport hub on the A6 between Leicester and Market Harborough, this will be a transport interchange fit for the future and may include a range of shared mobility options including car club vehicles, e-scooters and e-bikes, as well as an electric vehicle charging superhub and bus connections to both the City, Oadby, Wigston and Market Harborough; in this way the hub could form a 'Park & Ride', 'Park & Choose' or 'Park & Charge' option for journeys into Leicester City Centre or Oadby on the A6. This will be supported by a number of satellite hubs within the site providing access to e-bikes and e-scooters, to support a 'Decide and Provide' approach to sustainable transport provision rather than a 'Predict and Provide' approach which is reinforcing existing patterns. This involves deciding on the preferred future of sustainable transport choices and provide the means to work towards that whilst accommodating uncertainty. All hubs could also accommodate some non mobility components, such as parcel micro-consolidation and delivery lockers, and would provide consistent branding and high-quality information on sustainable travel options. This combination of hubs would help foster a community that would achieve net zero in terms of</p>	

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		<p>transport emissions, and, through the site's frontage on the A6 corridor into Leicester, the development could even achieve carbon negative, in terms of transport emissions, by transferring existing car-borne journeys to more active and sustainable modes.</p> <p>Employment: Led by the employment needs identified. Employment infrastructure, as well as additional employment land will be provided. Delivery of further innovation space to support small businesses to innovate and grow to be provided as part of the Newton Croft Hub, meeting a demonstrable gap in the current offer to support the growth of entrepreneurial businesses in south east Leicestershire.</p> <p>Community Facilities: Provision of a range of community facilities as part of Community Hub including public realm space for mobile facilities/stalls, flexible community / multi-agency space, shops, library provision, health care facilities and sports pitches.</p> <p>Community Interest Company: The establishment of the Newton Croft Community Interest Company to own and manage the legacy of the development. This could include management of open spaces, sports pitches, the Newton Croft Hub, active travel facilities and local charging hub. Appendix D provides an overview of a Community Interest Company, we are keen to engage with Oadby and Wigston Council and other Councils on this and would be happy to provide more information.</p> <p>Green Infrastructure: A large proportion of the site will be delivering green infrastructure including an opportunity to extend the existing Green Wedge between Oadby and</p>	

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		<p>Wigston and protect the separate identity of Newton Harcourt. Figure 3 below shows the current extent of the Green Wedge between Oadby and Wigston alongside the proposed Newton Croft development site and Wigston Meadows Phase 3, one the Council's Proposed Site Options (WIG/002). The diagram shows the relationship between the two proposed development sites and how the build line for the proposed Newton Croft development is set back with strategic green infrastructure proposed to maintain a substantial gap between the potential extension of Wigston. It is clear from the diagram how the Green Wedge could growth southwards with any future development of Oadby and Wigston including Newton Croft and continue to provide access to the wider Leicestershire Countryside. The Newton Croft site has been carefully designed to ensure that even if the proposed development site WIG/002 is developed out fully, the proposed development would see the reinforcement of existing green infrastructure links and maintain a significant gap equivalent to the Brock Hill Country Park and ensures there is no barrier between the Leicester Urban Area and the countryside.</p> <p>This consideration alongside the process of master planning the Newton Croft proposed development has been informed by the aim of creating healthy communities with a range of measures including access to open space, walkable access to services, green routes and sports provision for both residents of new and existing communities. Public Rights of Way link from the site north to both Oadby, Wigston and Brock Hills Country Park, providing a mix of commuting and recreational routes. The site will deliver biodiversity net gain and provide a range of open spaces, green routes and play spaces for community</p>	

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		<p>benefit.</p> <p>Energy Strategy: A site of this scale provides a range of options for meeting energy needs. The site will utilise a connection to the local electricity network and will require a new primary substation. For example, the proposed buildings could be provided with solar panels, where each house would have a battery to store energy so they can avoid using electricity at peak times, which could work in conjunction with the car batteries on site to minimise the site's electricity demands. The proposed dwellings will all comply with the latest building regulations that will include measures to minimise heat losses in line with the Future Homes Standard. Accordingly, there will be no gas supply to the site so all buildings will be heated by air/ground source heat pumps or a community heat network.</p> <p>Water Strategy: The site's surface water drainage system could utilise sustainable drainage techniques to naturally treat the water, before it being fed into a community rainwater harvesting system. Such an approach could then feed water back to the houses for use in toilets/washing machines, with any excess flows attenuated before being fed into the local surface water drainage system.</p> <p>The working draft concept masterplan for the site is ... included in Appendix B showing how all these elements can be achieved. The site has been designed to aid early delivery of the key benefits including the transport interchange, the hub and first primary school.</p> <p>It is important to emphasise, however, that the land uses shown are flexible, there is an opportunity to increase the</p>	

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		<p>scale of employment for example or reconfigure the education provision in response to the emerging local evidence base, as this is further developed and refined during the local plan making process.</p> <p>Recognising the strategic nature of the site, we would welcome the opportunity to continue to engage with Oadby & Wigston Borough Council, alongside neighbouring districts, Leicestershire County Council and other stakeholders over the coming year to assist with shaping the proposals and developing a mutual understanding of the opportunities that it can deliver.</p>	
<p>Stantec on behalf of the Co-operative Group and the University of Leicester</p> <p>14th May 2024</p>	<p>General</p>	<p>These Representations are submitted to Oadby and Wigston Borough Council (the “Council”) on behalf of our Clients, The Co-operative Group (“Co-op”), and The University of Leicester, in response to the Council’s Regulation 18B Consultation on the Preferred Options Draft Local Plan, which was published for consultation in April 2024.</p> <p>Our Clients welcome the progress that has been made on the Oadby and Wigston Local Plan and strongly support the Council’s intention to prepare a new Local Plan to meet its development needs for the Plan period 2020 to 2041. Notwithstanding this, our Clients have a number of concerns with the Draft Local Plan as published which they consider should be taken into consideration by the Council as it takes forward its Plan, and which we would be happy to work with the Council to address if required.</p> <p>In terms of context, our Clients have a number of individual land interests throughout the Borough, and have a joint interest through the land south of Gartree Road,</p>	<p>The Council will undertake considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, will be considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>and east of Stoughton Road, Oadby, which they are promoting jointly through the emerging Local Plan. A number of variant options have been submitted to the Council in this respect which have been allocated reference numbers OAD/009, OAD/010 and OAD/011 within the emerging Plan.</p> <p>In terms of the Co-op's other land interests within the Borough that are being promoted through the emerging Local Plan, these are listed below, along with their respective site reference numbers:</p> <ul style="list-style-type: none"> • OAD/001 – Land at Stoughton Grange Farm, Oadby • OAD/002 – Land South of Gartree Road, Oadby (this is the Co-op's part of the jointly promoted site referred to above) • OAD/003 – Land to the West, South and East of the Spire Leicester Hospital, Gartree Road, Oadby. <p>In addition to the above, the Co-op also have a land interest to the north of Gartree Road (Immediately to the north of site OAD/003 identified above), which lies within the administrative boundary of Leicester City Council and is currently being promoted through the emerging Leicester City Local Plan.</p> <p>In terms of the University of Leicester's land interests, the University is the owner and operator of the Stoughton Road playing fields, located on Stoughton Road, Oadby. Part of this site forms part of the land promoted jointly by our Clients as part of the Council's emerging Local Plan.</p>	

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		<p>Our Clients have previously made representations to the Council during the course of the emerging Local Plan process, including at the 'Call for Sites' stage (November 2020), as well as through the previous Regulation 18 Consultation, in October 2021. Further technical information submissions were also made to the Council on behalf of our Clients in July 2023, relating specifically to the promoted site at land south of Gartree Road and east of Stoughton Road. The Representations provided as part of this consultation should be read in conjunction with our Clients previous submissions.</p>	
<p>Stantec on behalf of the Co-operative Group and the University of Leicester</p> <p>14th May 2024</p>	<p>Concluding Comments</p>	<p>These Representations are submitted to Oadby and Wigston Council on behalf of our Clients, the Co-operative Group and the University of Leicester, in response to the Council's Preferred Options Consultation Draft of the New Local Plan, which was published for consultation in April 2024.</p> <p>Our Clients welcome the progress made by the Council in getting to this stage of the new Local Plan, and its intention to meeting the development needs of the Borough. Notwithstanding this however, our Clients have a number of concerns with the document as well as some of the policies within it, as well as the evidence base which underpins it.</p> <p>Fundamentally, despite the publication of a 'Preferred Options' draft, there is no clear steer from the Council as to what the growth strategy is for the delivery of new homes, what options have been considered and how the Council will meet its housing requirement (noting that this requirement has increased since the draft Local Plan was published). Moreover, it is apparent that the evidence</p>	<p>Noted.</p>

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		<p>base for the Local Plan is still being prepared, so it is not clear upon what basis any proposals within the Plan have been made.</p> <p>Clearly, the identification of proposed areas for growth for housing and employment would go some way to clarify whether a feasible strategy exists, but the Plan is silent on this. Whilst the sites that have been submitted to the Council are appended to the Plan, there is no evidence of assessment, or guidance as to which sites offer the potential to be deemed suitable and deliverable. In this regard, it is clear that a number of the sites are repeated several times or require differing landowners to combine interests to promote the site for development. It is not clear whether these sites benefit from a similarly joined-up approach to that which our Clients have adopted. Without some initial assessment of the potential deliverability of the sites put forward, or some form of sifting exercise, it cannot be determined whether the Plan's aspiration to meet the Borough's and part of Leicester's housing needs is achievable.</p> <p>Our Clients various land interests present deliverable opportunities for much needed housing development. Through previous submissions to the Council, as well as through this submission, our Clients would reaffirm their position that they are committed to working together, with the Council, to deliver the land for development in conjunction with one another, recognising that this joined-up approach is beneficial to the Council, as well as themselves, whilst also preferable from a place-making perspective. Indeed, our Clients have a clear track record of working proactively with the Council to deliver strategic housing land.</p>	

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		<p>Taking all of the above in the round, our Clients would reaffirm their continued support of the Council in progressing its new Local Plan, and encourage the Council to build on the body of work that has been undertaken to date to develop a robust and positive strategy for the housing and economic growth of the Borough moving forwards. We trust that these Representations will be afforded full consideration by the Council and would welcome the opportunity to meet with the Council to discuss matters further. We also reserve the right to appear at the Examination of the Local Plan, on behalf of our Clients, and on the basis of these Representations.</p>	

Chapter 1 – Introduction

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<p>Stantec on behalf of the Co-operative Group and the University of Leicester</p> <p>14th May 2024</p>	<p>Introduction and Context</p>	<p>Structure of Representations</p> <p>These Representations will highlight our Clients continued support for the Council in progressing its new Local Plan, and will also outline some areas of concern that we feel the Council would benefit from addressing now. As such, these Representations will be structured as follows:</p> <ul style="list-style-type: none"> • Section 2 will provide commentary on the nature of the consultation and outline our Clients’ broad concerns with the nature of the document itself; • Section 3 will then provide a more detailed analysis of the draft Local Plan’s policy-specific considerations; and finally, • Section 4 will provide concluding comments taking the commentary within the above sections in the round, and will make recommendations as appropriate. <p>In preparing these representations, we have had regard to paragraph 35 of the National Planning Policy Framework (NPPF) (2023), which sets out the requirement for the Council’s New Local Plan to be examined in order to assess whether the Plan has been prepared in accordance with the legal and procedural requirements, and whether it is sound. For ease of reference, the tests of ‘soundness’ for a Local Plan, as prescribed by the NPPF, are that it be:</p> <p>a) Positively Prepared – providing a strategy which, as a</p>	<p>Noted.</p>

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		<p>minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</p> <p>b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>c) Effective – deliverable over the plan period, and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the Statement of Common Ground; and</p> <p>d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.</p> <p>Clearly, the above tests are to be applied in the examination of the Local Plan, which is some way off. The purpose of these representations are, therefore, not to test for, or object to the Plan on the grounds of soundness, but to provide a constructive commentary in response to the Regulation 18B Preferred Options Consultation Draft document (and supporting evidence base), with the purpose of aiding the ongoing production of a Local Plan so that it may be improved and, ultimately found sound.</p> <p>The Representations made reflect the views of our Clients, and our knowledge and experience of the Site, the Borough, national planning policy requirements and local planning issues.</p>	

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<p>Stantec on behalf of the Co-operative Group and the University of Leicester</p> <p>14th May 2024</p>	<p>Introduction and Context</p>	<p>The Nature of the Consultation</p> <p>This Section of the Representations provides our Clients commentary on the consultation itself, as well as headline concerns around what the Consultation Document does, or does not provide, allied to its status as a “preferred options” document.</p> <p>It is appears that the draft Local Plan does not set a preferred growth strategy to meet the Borough’s development needs, as one would expect. Whilst our Clients understand the difficulties in committing to specific sites for development at this stage, given the limited progress that has been made on the Plan’s evidence base, they would expect that a ‘Preferred Options’ Local Plan would set out the series of options that the Council have considered and provide a degree of clarity on which option would be the Council’s preference for taking forward into the Regulation 19 stage of the Local Plan’s preparation.</p> <p>It is clear that the growth strategy is linked to the availability of sites, and our Clients note that, at Appendix 1, they have set out all of the Sites that have been submitted to the Council as part of previous ‘call for sites’ exercises.</p> <p>Whilst this transparency is welcomed, it does little to confirm which sites the Council proposes to allocate for development, and therein, what its growth strategy is. The Council states both within the draft Local Plan and on its website, that this draft Local Plan does not propose sites for allocation. Appendix 1 of the draft Local Plan indicates that none of the sites that have been submitted have been</p>	<p>Noted.</p> <p>The Council acknowledges that in an ‘ideal’ world, it would have been best to be in a position that allowed the Authority to set out its preferred growth strategy to meet need up to 2041 as part of the Regulation 18B Preferred Options public consultation draft.</p> <p>However, the situation that the Council finds itself in meant that the consultation draft was reflective of the status the situation the Council was in, versus the need to progress its Plan through to established deadlines imposed by the then Government, of at least reaching a point of Submission to the Planning Inspectorate by no later than the end of June 2025.</p> <p>Therefore, the Council will consult on the proposed allocation sites to meet its growth needs up to 2041 as part of the Regulation 19 Pre-Submission Draft Plan.</p>

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		<p>subject to any sort of evaluation, because the Council is yet to compile its evidence base as part of the plan (paragraph 12.1.11)</p> <p>All of this leads our Clients to question what the purpose of the 'Preferred Options' Consultation Draft is, because whilst it identifies a number of homes that the Plan will aim to deliver (which is subject to further commentary below), it does not commit to this number as a preferred housing requirement, or provide information on how or where this is going to be distributed, beyond generalised statements around the delivery of sustainable developments.</p> <p>Paragraph 1.7.2 of the draft Local Plan states that the Regulation 19/20 pre-submission consultation will, indicatively, take place in 2025. Whilst acknowledging that the Plan's evidence base needs to evolve, it is disappointing that the Council has not elected to be more ambitious with its programme, bearing in mind that the initial call-for-sites exercise took place in 2020.</p> <p>We would urge the Council to start working collaboratively with site promoters as soon as possible, to ensure that the necessary technical evidence can be coordinated to support the Regulation 19 Plan within the stated programme, to ensure no further slippage.</p>	

Chapter 2 – Spatial Portrait

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Chapter 3 – Vision and Spatial Objectives

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
<p>Stantec on behalf of Bloor Homes Limited and the Pierce Family (Landowners)</p> <p>15th May 2024</p>	<p>Spatial Objectives</p>	<p>Background evidence and ‘Spatial Objectives’</p> <p>The approach of Oadby and Wigston Council to their 15 spatial objectives, which feed into policies addressing issues such as housing delivery, are underpinned by the spatial and demographic context of the borough. This is set out in the first part of the Preferred Options document. The spatial objectives and subsequent policies have all been subject to a sustainability appraisal. This is pleasing to see as each ‘preferred approach’ has been assessed for its economic, social and environmental impacts and chosen above a reasonable alternative. We support the Council in its approach to this.</p> <p>We note that the Plan is intended to cover the period 2020 to 2041. We acknowledge that the start date is consistent with the Leicester and Leicestershire Housing and Economic Needs Assessment (2022) however with the examination not expected to commence until the latter half of 2025 (at the earliest) then we are considered that the Plan may not cover the minimum 15 year period required by paragraph 22 of the NPPF. Indeed paragraph 22 also states “where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery”. As there is the potential for strategic scale allocations to meet local and cross boundary needs, we firmly believe that a plan period over 15 years is fully justified. It is also our view that the plan period will need to</p>	<p>Noted.</p> <p>Support for the Spatial Objectives welcomed.</p> <p>The Council published an updated Local Development Scheme (LDS, Autumn 2024) that now seeks to consult on the Regulation 19 Pre-Submission Draft New Local Plan in Winter 2024-25, as opposed to Spring 2025, as proposed in the last iteration of the LDS.</p>

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		<p>be amended to reflect any update to the evidence base i.e. the HENA.</p> <p>In relation to this Preferred Options consultation, the Council set out an 'evidence base' for this plan. Currently, in relation to housing, this consist of the Leicester and Leicestershire Housing and Economic Needs Assessment (2022) as well as pointing towards Authority Monitoring Reports. The Council advise that "a number of studies were taken to aid the preparation of the current local plan [2011-2031] and these remain relevant to this review". We have reviewed these documents and refer to this data throughout these representations. We note at this stage, the evidence considered 'relevant', for example the HENA, is based on 2021/22 data and so does not account for more recent economic, social and policy changes and potential political shifts anticipated in 2024/5 (noting local elections taking place May 2024 and general election by 28th January 2025). The Council need to consider this in subsequent iterations of the plan, particularly when considering the likely changes in housing need trajectory and the number of sites that will need to be identified for allocation to ensure a 5-year supply is maintained. It does not appear that the Council have considered the impact of these factors within the Preferred Options document and we would encourage them to do so going forward into the next iteration (Regulation 19).</p> <p>Paragraph 11a of the National Planning Policy Framework (NPPF) (December 2023) requires that all local plans must be prepared in a way that promotes sustainable patterns of development, meeting the development needs of their area. Paragraph 11b goes further stating that strategic policies should provide for objectively assessed needs, in</p>	

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		<p>addition to needs that cannot be accommodated in neighbouring areas.</p> <p>The NPPF supports joint working through duty to cooperate on strategic matters and where development needs, including housing, where they cannot be accommodated wholly within a particular authority area could be met elsewhere. NPPF paragraph 27 states that “In order to demonstrate effective and ongoing joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross boundary matters being addressed and progress in cooperating to address these” (underline is our emphasis). There is no question that the NPPF expects the duty to cooperate to be used as a tool to address strategic matters, particularly objectively assessed needs and strategic infrastructure.</p> <p>In light of this, it is pleasing to see that the Regulation 18B Preferred Options Introduction ‘Strategic Context’ recognises the ‘strong spatial relationship’ that Oadby and Wigston shares with the City of Leicester and Leicester Urban Area. Recognition is given to the position of Oadby & Wigston within the Leicester and Leicestershire Housing Market Area and Functional Economic Market Area. We support the council in their role as part of a joined-up partnership to tackling strategic issues including delivering housing need. It is therefore positive to see the cross-boundary agreements in place in the form of the Leicester and Leicestershire Authorities Statement of Common Ground relating to Housing and Employment Land Needs (June 2022) We hope that cooperation continues amongst the relevant authorities. Land to the east of Wigston is ideally suited to meeting not on local housing needs, but</p>	

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		<p>also the Leicester City shortfall, there for land south of Newton Lane, which has capacity to deliver over 500 homes within the plan period can make a significant contribution to meeting housing need and so should be considered for allocation.</p> <p>We agree that the fifteen spatial objectives set out at part 3 'Vision and Spatial Objectives' are appropriate and cover the main topics that we would expect to see in relation to cross boundary co-operation inter alia, Objectively Assessed Need (OAN), Transport links and climate action. It is pleasing to see Leicester and Leicestershire's Statement of Common Ground (2022) includes an agreement for surrounding boroughs to deliver Leicester's housing shortfall through a spatial apportionment. This includes commitment by Oadby & Wigston Borough Council to provide 52 dwellings per annum. Continued collaboration on these issues will ensure compliance with NPPF paragraphs 24 to 26 (Maintaining Effective Cooperation). However, as stated at point 2.1.1 ad 2.1.2 above, the approach to these objectives and the Local Plan Policies adopted to deliver them need to account for more recent social, economic and policy changes.</p> <p>We note that the Council intend to progress the new Local Plan under the current system, and this requires the Plan to be submitted for examination prior to June 2025. Whilst we fully support the Council in their aim of progressing the Local Plan under current legislation, we are concerned there remains considerable work to do in order to progress to the Regulation 19 stage, which includes draft allocations and up to date evidence to underpin the emerging spatial strategy and policies. We would therefore recommend bringing forward the Regulation 19 stage</p>	

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		<p>consultation to ensure that there is sufficient time for consultation on the Proposed Submission version of the Plan, particularly as the current consultation draft does not contain any site allocations, merely a list of all sites submitted as potential options.</p>	
<p>Stantec on behalf of the Co-operative Group and the University of Leicester</p> <p>14th May 2024</p>	<p>Vision and Spatial Objectives</p>	<p>Our Clients note the Council’s approach to their 15 spatial objectives, which feed into policies addressing issues such as housing delivery, and that these are underpinned by the spatial and demographic context of the borough. This is set out in the first part of the draft Local Plan. The spatial objectives and subsequent policies have all been subject to a sustainability appraisal. This is pleasing to see as each ‘preferred approach’ has been assessed for its economic, social and environmental impacts and chosen above a reasonable alternative. Our Clients support the Council’s approach here.</p> <p>Additionally, our Clients note that the Plan is intended to cover the period 2020 to 2041. We acknowledge that the start date is consistent with the Leicester and Leicestershire Housing and Economic Needs Assessment (2022) however with the examination not expected to commence until the latter half of 2025 (at the earliest) then we are considered that the Plan may not cover the minimum 15 year period required by paragraph 22 of the NPPF. Indeed paragraph 22 also states “where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery”. As there is the potential for strategic scale allocations to meet local and cross boundary needs, we firmly believe that a plan period</p>	<p>Support for the Spatial Objectives welcomed.</p> <p>The Council published an updated Local Development Scheme (LDS, Autumn 2024) that now seeks to consult on the Regulation 19 Pre-Submission Draft New Local Plan in Winter 2024-25, as opposed to Spring 2025, as proposed in the last iteration of the LDS.</p>

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		<p>over 15 years is fully justified. It is also our view that the plan period will need to be amended to reflect any update to the evidence base i.e. the HENA.</p> <p>In terms of the Spatial Objectives themselves, our Clients agree that the fifteen spatial objectives set out at Part 3 of the draft Local Plan are appropriate, and cover the main topics that one would expect to see in relation to cross-boundary co-operation operation inter alia, Objectively Assessed Need (OAN), Transport links and climate action (noting, in respect of the former, that the draft Local Plan indicates accommodating some of Leicester City's unmet housing need, and that Leicester City Council is preparing a new Local Plan which assumes such assistance from neighbouring authorities). It is pleasing to see Leicester and Leicestershire's Statement of Common Ground (2022) includes an agreement for surrounding boroughs to deliver Leicester's housing shortfall through a spatial apportionment. This includes commitment by Oadby & Wigston Borough Council to provide 52 dwellings per annum. Continued collaboration on these issues will ensure compliance with NPPF paragraphs 24 to 26 (Maintaining Effective Cooperation). However, as stated at point 2.1.1 and 2.1.2 above, the approach to these objectives and the Local Plan Policies adopted to deliver them need to account for more recent social, economic and policy changes.</p> <p>Additionally, it is noted that the sites listed at Appendix 1 of the draft Local Plan provide for a pool of 5,600 dwellings, albeit a number of these sites are included multiple times and overlap, and it is not clear whether a joined-up approach is being taken (as is the case in respect of our Clients land interests). It is apparent that the</p>	

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		<p>Council are yet to assess these sites, but it is important that such an assessment is to be undertaken as soon as possible to understand the actual number of dwellings that are deliverable, and how this relates to the Borough's housing need (including that of Leicester City, which the Council has committed to accommodating). In order to understand how this current pool of sites will address the development needs of the Borough.</p> <p>We note that the Council intends to progress the new Local Plan under the current system, and this requires the Plan to be submitted for examination prior to June 2025. Whilst we fully support the Council in their aim of progressing the Local Plan under current legislation, we are concerned there remains considerable work to do in order to progress to the Regulation 19 stage, which includes draft allocations and up to date evidence to underpin the emerging spatial strategy and policies. We would therefore recommend bringing forward the Regulation 19 stage consultation to ensure that there is sufficient time for consultation on the Proposed Submission version of the Plan, particularly as the current consultation draft does not contain any site allocations. It is important to stress here that our Clients are committed to working collaboratively in the promotion of their land interests, in the interest of a high quality development, and have undertaken all of the necessary technical assessments and surveys to justify the allocation, and future development of their land.</p>	

Chapter 4 – Spatial Strategy (Policies 1, 2 and 3)

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<p>Define Planning and Design on behalf of Bloor Homes Limited, 14th May 2024</p>	<p>Policy 1: Spatial Strategy for Development within the Borough</p>	<p>POLICY 1: SPATIAL STRATEGY FOR DEVELOPMENT WITHIN THE BOROUGH (STRATEGIC):</p> <p>Bloor Homes Limited (BHL) welcomes the preparation of the Oadby and Wigston Local Plan (OWLP), and Oadby and Wigston Borough Council's (OWBC) intention to positively plan for new development in the forthcoming plan period. That aligns with the Government's priority to ensure that all local authorities maintain up-to-date local plans, which the Secretary of State for Levelling Up, Housing and Communities considers is critical in delivering for communities and "getting more homes built in the right places" (Written Ministerial Statement, 19th December 2023).</p> <p>In that regard, BHL welcomes the opportunity to comment on the Regulation 18B 'Local Plan Preferred Options' (LPPO) document, given its land interests at 'Land North of Glen Gorse Golf Course' (site reference WIG/010). It is also noted that separate representations have been made by BHL in relation to their land interests at 'Land to the South of Sutton Close, Oadby' (site reference OAD/007). Though the sites are able to be delivered separately, they are related given their proximity to each other, and would have the potential to form Phases 3 and 4 of the committed Cottage Farm, Oadby development. The sites are, therefore, both referred to at points of this submission.</p> <p>BHL have also submitted representations in respect of their land interest at Glebe Farm, Newton Lane (site reference pending).</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach</p>

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<p>Define Planning and Design on behalf of Bloor Homes Limited, 14th May 2024</p>	<p>Policy 1: Spatial Strategy for Development within the Borough</p>	<p>NATIONAL CONTEXT:</p> <p>The OWLP is being developed in the context of the ongoing acute national housing supply crisis. That is recognised by all of the main political parties, as is the importance of the housing industry to the nation's economy. Remedying this has been a critical policy imperative for successive Governments, with the February 2017 White Paper 'Fixing Our Broken Housing Market' presenting startling facts and figures highlighting that on average only 160,000 new homes had been delivered each year in England since the 1970s.</p> <p>The White Paper highlighted that the years of under supply on a national scale have led to rising average house prices compared to earnings, declining home ownership in the under 35s, and escalating rental costs. That is a particularly pertinent point in Oadby and Wigston Borough, as discussed in further detail below.</p> <p>The Government's White Paper also acknowledged that the under-delivery of housing has had a severe negative impact on the economy in terms of labour mobility, the construction industry, economic spend, and increasing housing benefit costs. Therefore, it is clear that those socioeconomic impacts will only worsen within the area if the eLP does not begin to remedy the existing affordability issues and, in that regard, the White Paper recognised that a significant uplift in the delivery of homes is needed to address such issues where they arise.</p> <p>A subsequent statement from the Ministry of Housing, Communities and Local Government (October 2018) sought to quantify the level of delivery that should be</p>	<p>The Council published an updated Local Development Scheme (LDS, Autumn 2024) that now seeks to consult on the Regulation 19 Pre-Submission Draft New Local Plan in Winter 2024-25, as opposed to Spring 2025, as proposed in the last iteration of the LDS.</p> <p>Once the Council submits its Plan to the Planning Inspectorate, the timetable going forward will largely be determined by Planning Inspectorate and is therefore out of local control. Therefore, the Council will keep the Plan-period set at 2020-2041 at this time.</p>

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		<p>achieved on a national scale, and confirmed the Government's commitment to delivering 300,000 homes a year by the mid 2020s to address those matters; a level that has not been achieved since 1969. Recent statements by the Secretary of State for Levelling Up, Housing and Communities have reiterated the Government's commitment in this regard, including the press release relating to the publication of the latest version of the National Planning Policy Framework (NPPF) in December 2023.</p> <p>Therefore, the Government's commitment to housebuilding permeates through the NPPF, which focuses (at paragraph 60) on "significantly boosting" housing delivery to address identified housing needs. The NPPF also now explicitly recognises that an area's actual housing need may exceed the base LHN that is derived from the standard method. In that context, the NPPF highlights the importance of ensuring that a sufficient amount and variety of land comes forward where it is needed, so that the housing needs of specific groups are addressed and that land is developed without unnecessary delay. It also highlights the importance of delivering a sufficient quantum of housing in rural areas to support their ongoing vitality (paragraphs 78 - 79).</p> <p>The eLP should, therefore, be advanced in line with the clear importance that the Government attributes to increasing the supply of housing both to respond to the national housing crisis (which is manifesting itself in Oadby and Wigston) and to realise the socio-economic benefits that are related to the delivery of housing development to address the identified housing needs of the Borough and the wider area.</p>	

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<p>Define Planning and Design on behalf of Bloor Homes Limited, 14th May 2024</p>	<p>Policy 1: Spatial Strategy for Development within the Borough</p>	<p>PLAN PERIOD:</p> <p>The NPPF requires local plans to “look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities”. It also states that they should “set a vision that looks further ahead” to a period of at least 30 years “where larger scale developments such as new settlements or significant extensions to existing villages and towns forms part of the strategy for the area”; which is potentially the approach that OWBC may take through the preparation of the OWLP.</p> <p>The OWLP suggests a 2020 – 2041 plan period, with strategic policies prepared on that basis. The start date of 2020 is proposed to align with the evidence that has been prepared on behalf of the Leicester and Leicester Housing Market Area (LLHMA) authorities, which is an entirely sensible approach.</p> <p>However, for an end date of 2041 to meet the requirements of NPPF paragraph 22, the plan would need to be adopted by the end of 2026; in just over two-and-a-half years’ time. That is not a realistic timescale for the preparation of the OWLP.</p> <p>The LPPO suggests at paragraph 1.7.2 that OWBC will undertake a Regulation 19 consultation in Spring 2025. As a point of principle, given that the LPPO document does not identify preferred allocation sites, OWBC may wish to carry out an additional Regulation 18 consultation to formally consult on its preferred allocation sites. Regardless of the approach taken, however, before OWBC identify proposed allocations, they must process</p>	<p>The Plan-period aligns with the base date of the LLHENA and extends to 2041 to align with the key local and strategic evidence that the Council has commissioned and delivered as part of the production of this emerging New Local Plan.</p> <p>The Council published an updated Local Development Scheme (LDS, Autumn 2024) that now seeks to consult on the Regulation 19 Pre-Submission Draft New Local Plan in Winter 2024-25, as opposed to Spring 2025, as proposed in the last iteration of the LDS.</p> <p>Once the Council submits its Plan to the Planning Inspectorate, the timetable going forward will largely be determined by Planning Inspectorate and is therefore out of local control. Therefore, the Council will keep the Plan-period set at 2020-2041 at this time.</p>

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		<p>and take account of the comments received through this consultation. They will then need to bring together the OWLP evidence base (which seemingly is awaiting a number of key reports), and consider the appropriateness of individual sites and the manner in which a sustainable spatial strategy can be developed. That will require significant work and consultation with statutory consultees, site promoters / developers and councillors; all of which is time consuming. That process will, therefore, take well over the one year period that OWBC suggests.</p> <p>Therefore, the next consultation (whether a further Regulation 18 or Regulation 19 consultation) is unlikely to be undertaken in Spring 2025 as suggested. In addition to that, the timescales at paragraph 1.7.2 of the LPPO document suggest that the OWLP will be submitted for examination as soon as the Regulation 19 consultation ends, in Spring 2025. That is also not realistic, as OWBC will again need to process and take account of all comments received, propose any required amendments to the plan, and prepare the plan for submission; which will require approval through the Council's internal committees. It is likely that this will take 6 months, as a minimum.</p> <p>The LPPO document does not provide any dates for the examination of the OWLP, which is itself often a complex process. Firstly in terms of the commencement of the examination, the OWLP will be examined against the 2023 NPPF. Although further detail is awaited, it appears that the Government intends to 'batch' examinations of New Local Plans based on the age of the extant plan. As OWBC's extant plan was adopted in April 2019, and therefore is more recently adopted than some other</p>	

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		<p>authorities, it is entirely likely that the OWLP will not be in the first batch of plans that are examined under the 2023 NPPF. Likewise, the examination process itself is likely to be lengthy given the complex nature of the plan and the matters that are considered.</p> <p>Therefore, in all likelihood, the OWLP will not be adopted by the end of 2026 as is required to support an end date of 2041. Rather, it is more likely that the plan will be adopted in 2028 at the earliest. Therefore, it is proposed that the end date of the plan is extended to 2043 to meet the requirements of NPPF paragraph 22. That must be done at this early stage, where Sustainability Appraisal and Site Selection work can comprehensively consider the overall housing requirement, the spatial strategy, and site allocations; rather than during the examination of the plan if the Inspector was to request that additional allocations are identified to account for an extension to the plan period.</p>	
<p>Define Planning and Design on behalf of Bloor Homes Limited, 14th May 2024</p>	<p>Policy 1: Spatial Strategy for Development within the Borough</p>	<p>THE HOUSING REQUIREMENT:</p> <p>Proposed Approach: BHL supports the recognition within the LPPO that the OWLP's housing requirement must respond to the Borough's own housing needs, but also provide an appropriate contribution to the unmet needs arising from Leicester City Council (LCC). That aligns with the NPPF's requirement for local plans to "provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas" (paragraph 11b).</p> <p>It is noted that the LPPO proposes to make provision for</p>	<p>The Leicester and Leicestershire Statement of Common Ground (June 2022) establishes that the agreed position across all of the Authority areas is based upon a clear evidence-based approach, on the back of a long track record of effective joint working on strategic matters. Indeed, all of the Authorities continue to engage on an ongoing basis in this manner.</p> <p>At the time of signing, the Government's standard method for calculating housing need suggested that the Leicester and Leicestershire need was to provide 91,408 homes (5,713 per year, 2020 to 2036). For the</p>

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		<p>240 dwellings per annum (dpa). That figure is derived from the Statement of Common Ground (SoCG) in relation to housing needs that has now been agreed between the LLHMA authorities. It comprises OWBC's Local Housing Need (LHN) of 188dpa derived from the Government's Standard Method (SM) in June 2022, plus an agreed contribution of 52dpa towards LCC's unmet needs.</p> <p>Since that point, however, OWLP's SM-derived LHN has increased to 198dpa, which reflects the increase in the housing affordability ratio over recent years, as captured in the latest affordability data that was published by the Government in March 2024. At the very least, therefore, the housing requirement should be set at 250dpa (198dpa plus the agreed 52dpa contribution), but must be kept under review through the preparation of the plan.</p>	<p>Borough of Oadby and Wigston, this figure equated to 188 dwellings per annum.</p> <p>In addition to that, an agreed approach to redistributing Leicester City's unmet need of 18,700 homes over the plan-period 2020-2036 was also set out, seeing an apportionment of 52 dwelling per annum for Oadby and Wigston Borough Council.</p> <p>The SoCG stated that is was agreed by all Authorities that the these figures are subject to testing through each individual Local Planning Authority's plan making process.</p> <p>It has subsequently been agreed by all Leicester and Leicestershire local authorities that in absence of any evidenced approach to deal with the period 2036-2041, each local authority would roll-forward the apportionment figure of Leicester City's unmet need.</p> <p>Combined, this represented a maximum growth figure of up to 240 dwellings per annum for the Borough of Oadby and Wigston. Over a plan period of 2020 – 2041, this figure represents 5,040 dwellings in the Borough.</p> <p>OWBC has subsequently tested three growth rates (for housing) through emerging evidence over its Plan period of 2020-2041. The lowest growth figure of 188 dpa (the then Standard Method figure); a upper growth figure of 240 dpa (as per the SoCG); and, a median figure of 214 dpa.</p> <p>Taking account of all evidence, the Council is taking forward the upper growth figure of 240 dpa, equating to</p>

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			<p>5,040 dwellings in total to be provided over the Plan-period of 2020-2041 in the Borough. This growth strategy represents the most appropriate for the Borough of Oadby and Wigston.</p> <p>The need figure of 240 dpa has been agreed with all other Leicester and Leicestershire authorities and therefore amendments to the growth figure would need to be agreed by all Partners across the County and tested via the Council's evidence to support the New Local Plan.</p>
<p>Define Planning and Design on behalf of Bloor Homes Limited, 14th May 2024</p>	<p>Policy 1: Spatial Strategy for Development within the Borough</p>	<p>Affordability Uplift:</p> <p>However, the NPPF makes clear that there may be circumstances "which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals" (paragraph 61). Housing affordability is one such factor, given the interconnected nature of housing delivery and affordability. The Leicester and Leicestershire Housing and Economic Needs Assessment (LLHENA) that was instructed by the LLHMA authorities considered affordability on a subregional basis. Therefore, whilst it found that there was not a basis to specifically uplift the overall housing need of the entire Leicestershire area on that basis, it explicitly notes that "it is a consideration in setting a housing requirement."</p>	<p>The Council is aware of the need to deliver a range of housing choices for its local residents, including affordable housing. Delivery of such is not limited to only on and / or off site developer contributions via S.106 and therefore the Council will continue to explore all mechanisms for delivery as part of its current, as well as this emerging New Local Plan.</p> <p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for</p>

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		<p>The potential need for an uplift relating to housing affordability is, therefore, a point to be considered by each local authority. Moreover, it is a key issue for OWBC, which has a housing affordability ratio of 11.3 as of 2023; the highest in the East Midlands. Notably, the ratio is also increasing rapidly; having been just 6.73 in 2013. Amongst other factors, that has resulted in a significant affordable housing need of 208dpa (as per the 2022 LLHENA); which exceeds the SM-derived LHN of 188dpa, and equates to 86.6% of the re-distributed housing figure of 240dpa that was agreed through the LLHMA SoCG.</p> <p>Clearly, a requirement for c. 86% of houses to be affordable would not be viable (the affordable housing requirement in the extant plan ranges between 10% and 30%, by way of comparison). The required level of affordable housing delivery would also be unprecedented in the Borough, which has experienced the delivery of just 334 affordable units in total between 2011 and 2023. There is, therefore, compelling evidence to increase the overall level of housing need to deliver as much affordable housing as possible.</p> <p>A failure to deliver sufficient housing (including affordable housing) will entrench existing affordability issues in the Borough, which will have significant impacts on the Borough's residents. Notably, it will further increase house prices and lead to a cycle of unaffordability; particularly for more marginalised groups who are less able to access even affordable products. That will also increase associated socio-economic impacts relating to persistent affordability issues; including escalating house prices, declining home ownership and increasing housing benefits costs.</p>	<p>its approach. In addition, the Council will publish background evidence to underpin its approach</p>

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		<p>Insufficient provision of housing (including affordable housing) is also a limiter to economic growth, labour mobility, and local economic spend; as recognised in NPPF paragraph 86c. The failure to deliver sufficient residential development, therefore, can give rise to a position where there is an insufficient working age population to fill jobs within the Borough and its surrounding areas, which could stunt economic activity and / or give rise to unsustainable growth and commuting patterns, with employees being forced to live in more peripheral areas due to affordability issues, and commuting into the Borough, or through the Borough to nearby Leicester. That is clearly contrary to the principles of sustainable planning, and would also give rise to associated environmental issues associated with car use.</p>	
<p>Define Planning and Design on behalf of Bloor Homes Limited, 14th May 2024</p>	<p>Policy 1: Spatial Strategy for Development within the Borough</p>	<p>Additional Evidence:</p> <p>In that regard, whilst an annual housing requirement of 250dpa (taking account of the 10dpa uplift to the SM-derived LHN) is a good starting point in that it takes account of the committed contribution to the unmet needs of LCC, OWBC should prepare additional evidence to consider what an appropriate uplift is to begin to remedy the affordability issues in the Borough. That would align with the approach that the LLHENA suggests, and therefore OWBC should instruct a focussed Housing Needs Assessment to cover that point specifically.</p> <p>An update to the Sustainability Appraisal (SA) will also be required, as the current version of the SA has not considered any options above 240dpa. However, it is important that the SA takes a pragmatic approach to</p>	<p>The evidence that the Council has commissioned and delivered as part of the process of producing this Local Plan has established that the need figure for this Plan-period is 240 dpa.</p> <p>The need figure of 240 dpa has been agreed with all other Leicester and Leicestershire authorities and therefore amendments to the growth figure would need to be agreed by all Partners across the County and tested via the Council's evidence to support the Regulation 19 Pre-Submission Draft Plan.</p>

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		<p>considering those higher growth options. For example, whilst the majority of Local Plan SAs recognise the additional benefits that higher growth options will bring in terms of housing delivery, they often overlook that this will also remove barriers to economic growth, and can also support the delivery of non-residential social infrastructure that can both serve new developments and increase accessibility to key services and facilities for existing residents. Conversely, Local Plan SAs often over-simplify the consideration of environmental effects, suggesting that higher growth options are associated with more significant effects. That, however, both overlooks the environmental effects that are associated with an insufficient level of development (in terms of unsustainable growth patterns, as discussed above), and also does not recognise that negative impacts can be avoided or minimised by identifying suitable sites and including allocation requirements to facilitate careful masterplanning.</p> <p>OWBC should, therefore, utilise that additional evidence in a rounded way to reach a view as to what an appropriate annual housing requirement is, taking account of all factors.</p>	
<p>Define Planning and Design on behalf of Bloor Homes Limited, 14th May 2024</p>	<p>Policy 1: Spatial Strategy for Development within the Borough</p>	<p>Setting the Housing Requirement:</p> <p>It is not possible to predict the outcome of that additional analysis. However, applying the 250dpa figure (LHN as of 2023, plus LCC contribution) across the updated plan period of 2020-2043 (as above) would result in a housing requirement of at least 5,750 dwellings. However, the actual housing requirement should be higher still once an additional uplift for affordable housing provision has been applied.</p>	<p>The evidence that the Council has commissioned and delivered as part of the process of producing this Local Plan has established that the need figure for this Plan-period is 240 dpa.</p> <p>The need figure of 240 dpa has been agreed with all other Leicester and Leicestershire authorities and therefore amendments to the growth figure would need</p>

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			<p>to be agreed by all Partners across the County and tested via the Council's evidence to support the Regulation 19 Pre-Submission Draft Plan.</p> <p>The Plan-period aligns with the base date of the LLHENA and extends to 2041 to align with the key local and strategic evidence that the Council has commissioned and delivered as part of the production of this emerging Regulation 19 Pre-Submission Draft Local Plan</p>
<p>Define Planning and Design on behalf of Bloor Homes Limited, 14th May 2024</p>	<p>Policy 1: Spatial Strategy for Development within the Borough</p>	<p>THE RESIDUAL HOUSING TARGET:</p> <p>OWBC are, of course, able to take account of completions in the plan period and supply from existing commitments. Whilst the LPPO document does not formally state the supply from those sources, the Residential Land Availability Assessment suggests that 703 dwellings have been delivered since 2020, and that there is a supply of c. 1,867 dwellings to 2031. That totals 2,570 dwellings.</p> <p>Taking the minimum housing requirement of 5,750 dwellings would leave a residual requirement of 3,180 dwellings in the forthcoming plan period; although as above, that will be higher once the affordability uplift has been accounted for.</p> <p>Moreover, the OWLP should also incorporate a buffer above that residual housing requirement, which will (i) take account of the fact that not all of the committed sites or new allocations will deliver within the plan period, (ii) ensure that a five year supply of housing can be provided and maintained through the plan period, and (iii) further maximise the delivery of affordable housing. In that</p>	<p>The evidence that the Council has commissioned and delivered as part of the process of producing this Local Plan has established that the need figure for this Plan-period is 240 dpa.</p> <p>The need figure of 240 dpa has been agreed with all other Leicester and Leicestershire authorities and therefore amendments to the growth figure would need to be agreed by all Partners across the County and tested via the Council's evidence to support the Regulation 19 Pre-Submission Draft Plan</p>

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		<p>regard, the Local Plan Expert Group recommends a buffer of 20%.</p> <p>Applying that to the residual housing requirement would result in a housing target of at least 3,816 new homes; although again that is likely to be higher once an affordability uplift has been applied to the base housing requirement.</p>	
<p>Define Planning and Design on behalf of Bloor Homes Limited, 14th May 2024</p>	<p>Policy 1: Spatial Strategy for Development within the Borough</p>	<p>HOUSING SUPPLY:</p> <p>There is, therefore, a need to identify a number of sites to accommodate a significant level of housing delivery. That should comprise a portfolio of sites of varying sizes and typologies, in accordance with the NPPF (paragraph 68); which recognises that small and medium sized sites can be built-out quickly (see paragraph 68), and that larger sites can provide large numbers of new homes (paragraph 73). The OWLP should provide an appropriate portfolio of different sites.</p> <p>With that said, the LPPO correctly recognises that potential areas of growth are limited (LPPO page 23). Notably, there are limited site options in the urban area, and therefore growth will primarily be focused to sites that sit adjacent to settlements. However, even of the areas that are listed by OWBC, there are clear constraints to suitability, availability and deliverability that are associated both with the potential locations for growth in a general sense, and the sites that have been promoted through the Local Plan process to date. In some cases, those constraints will mean that some promoted sites are unsuitable for residential development, or would significantly limit the capacity of a site.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>Therefore, whilst the LPPO correctly recognises that potential areas of growth are limited, the Council's further analysis of the promoted sites will inevitably highlight that the actual supply from sites that are suitable, available and deliverable is more limited still. It is important, therefore, that OWBC takes that into account in developing the spatial strategy and identifying allocation sites, and the Council should maximise the potential of suitable development sites as a result.</p> <p>Likewise, if the OWLP is to allocate strategic sites, it should recognise that residential deliveries may not be realised until the very end of the plan period or, for particularly large and complex sites, may not begin in the plan period at all. OWBC should consider that when identifying sites, and should provide a housing trajectory that sets out expected annual deliveries for each site (as required by NPPF paragraph 75), in order to demonstrate that (i) the housing requirement will be met, and (ii) that OWBC can demonstrate and maintain a five year supply of housing through the plan period. That also reinforces the importance of OWBC having a portfolio of sites of varying sizes and typologies.</p>	
DLP Planning Ltd on behalf of Bowbridge Land Limited, 14 th May 2024	Policy 1: Spatial Strategy for Development within the Borough	<p>NATIONAL PLANNING POLICY CONTEXT</p> <p>The development of the OWLP is being prepared in the context of a recognised National Housing crisis.</p> <p>It is essential that the emerging Local plan address the housing needs of the immediate community, but also the adjoining urban area of Leicester.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish</p>

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		<p>Addressing housing needs has a significant impact upon social, economic and environmental considerations (the three stands associated with Sustainability), and it is essential that the right sites are identified and brought forward to address these objectives over the emerging plan period.</p> <p>The current Government are placing considerable emphasis upon the delivery of up-to-date Development Plans and therefore the OWLP offers an opportunity to positively contribute to meeting housing needs and providing the development industry with a clear commitment through a plan led system to aid decision making and the delivery of housing.</p> <p>Indeed, the National planning Policy Framework (see para 60) explicitly seek to ensure that there will be a “significant boost “to the delivery of housing. Equally, the housing supply can be increased through a variety of sites which meet a diverse range of needs and hence avoid the delay in providing much needed accommodation.</p>	background evidence to underpin its approach.
DLP Planning Ltd on behalf of Bowbridge Land Limited, 14 th May 2024	Policy 1: Spatial Strategy for Development within the Borough	<p>Plan Period</p> <p>It is noted that the emerging plan period will run until 2041 following anticipated adoption in 2016.</p> <p>Local plans are intended to run for a 15-year period (see par 22 of the NPPF). Given the current delays in progressing the Local plan and further consultation exercise to be conducted, notwithstanding the examination itself, it is anticipated that the adoption of the plan is unlikely to be 2026, and so the need date of the plan period should be 15 years from the date of adopted and</p>	<p>Noted.</p> <p>The Plan-period aligns with the base date of the LLHENA and extends to 2041 to align with the key local and strategic evidence that the Council has commissioned and delivered as part of the production of this emerging New Local Plan.</p> <p>The Council published an updated Local Development Scheme (LDS, Autumn 2024) that now seeks to consult on the Regulation 19 Pre-Submission Draft New Local Plan in Winter 2024-25, as opposed to Spring 2025, as</p>

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		not necessarily 2041 as suggested.	<p>proposed in the last iteration of the LDS.</p> <p>Once the Council submits its Plan to the Planning Inspectorate, the timetable going forward will largely be determined by Planning Inspectorate and is therefore out of local control. Therefore, the Council will keep the Plan-period set at 2020-2041 at this time.</p>
<p>DLP Planning Ltd on behalf of Bowbridge Land Limited, 14th May 2024</p>	<p>Policy 1: Spatial Strategy for Development within the Borough</p>	<p>Housing Requirements</p> <p>The emerging OWLP recognises that the plan should not only take account of the Borough's own housing needs, but also provide a contribution to the to the unmet need of the adjoining Authority (Leicester City Council). Such an approach complies with the objectives of the NPPF guidance (see Par 11b).</p> <p>The overall housing figures will need to be monitored throughout the Local Plan review and these can be commented upon again at Regulation 19 stage of the consultation process if required. Our client reserves the right to comment on the overall housing figures as the Local Plan evolves.</p>	<p>Noted.</p>
<p>Fisher German on behalf of David Wilson Homes East Midlands 14th May 2024</p>	<p>Policy 1: Spatial Strategy for Development within the Borough</p>	<p>The Council's approach of ensuring that a range of sites are provided is supported, and is agreed that adopting a strategy which, to use the plan's terminology, "putting 'all of its eggs in one basket'" (Page 22) would be an unnecessarily risk. Adopting a strategy where a range of sites are provided allows for choice and competition in the market and assists with market absorption, thus delivery.</p> <p>Our client supports the continued commitment by Oadby and Wigston Borough Council to meet it duly apportioned share of Leicester City's unmet needs, as agreed through</p>	<p>Support welcomed.</p> <p>The Plan-period aligns with the base date of the LLHENA and extends to 2041 to align with the key local and strategic evidence that the Council has commissioned and delivered as part of the production of this Regulation 19 Pre-Submission Draft Local Plan.</p> <p>The Council published an updated Local Development Scheme (LDS, Autumn 2024) that now seeks to consult</p>

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		<p>the Leicester & Leicestershire Authorities - Statement of Common Ground relating to Housing and Employment Land Needs (June 2022). Whilst the NPPF was amended in December 2023, Paragraph 62 affirms that the urban uplift should be delivered on a cross boundary basis where there are voluntary agreements in place. Having regard for the scale of Leicester City's unmet need, this approach is the only spatial option by which needs can be met fully.</p> <p>The Council's approach in respect of adopting the unmet need uplift beyond 2036 is supported and logical, as whilst the Council is correct to state that Leicester City's unmet needs have only been evidenced until 2036, on the basis of available evidence and logic, unmet needs will likely persist beyond as Leicester City's development opportunities continue to be exhausted. Leicester City is one of the fastest growing cities in the UK and thus housing within the HMA should ensure this growth can be facilitated with the availability of suitable housing for the growing population. There will be opportunity through Plan review to amend the Plan if required, but as a starting point the assumption that a similar level of unmet need will be met in Oadby and Wigston is sound at this stage.</p> <p>In respect of the Plan period, the Council will be aware that Paragraph 22 of the NPPF is unequivocal that Strategic Policies should look ahead over a minimum 15-year period for adoption. The Council confirm within the Spring 2024 Local Development Scheme that the plan is anticipated to be adopted in Summer/Autumn 2026. This would leave a highly marginal 15-year Plan period post adoption.</p>	<p>on the Regulation 19 Pre-Submission Draft New Local Plan in Winter 2024-25, as opposed to Spring 2025, as proposed in the last iteration of the LDS.</p> <p>Once the Council submits its Plan to the Planning Inspectorate, the timetable going forward will largely be determined by Planning Inspectorate and is therefore out of local control. Therefore, the Council will keep the Plan-period set at 2020-2041 at this time.</p>

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		<p>The wording adopted by the NPPF is clear and unequivocal, that the 15-year period is expressed specifically as a minimum, which indicates it should be exceeded only. The NPPF could have adopted more flexible language but this requirement, which has been present in all iterations of the Framework since 2018, is clear this is a minimum threshold to deliver a sound plan period, and to be sufficiently consistent with National Policy (Paragraph 35d).</p> <p>The proposed adoption date leaves limited contingency for any potential delays prior to submission or at examination which may delay the adoption date. Officers may be aware that the Charnwood Local Plan is already in its third year of examination, delays to the Bedford Local Plan will likely take a similar timescale prior to completion of examination, thus highlighting the scope for unforeseen delay in bringing sound Plans through to adoption. Given this requirement can be read as being a matter of soundness the adoption of a slightly longer Plan period may assist the Council in safeguarding the Plan and provide a buffer from any potential delays up to and including examination, which are certainly not uncommon.</p>	
<p>G Longley Planning and Property Services on behalf of Davidsons Developments Ltd</p> <p>14th May 2024</p>	<p>Policy 1: Spatial Strategy for Development within the Borough</p>	<p>The Preferred Options document sets out the Council's proposals for the Spatial Strategy for the Plan. It proposes a plan period extending to 2041. This is supported as it should ensure that the plan provides appropriate guidance on future development over a 15-year period from adoption, which is likely to be in 2026. However, this timeline is tight, and any delay would require the end date for the plan to be reviewed.</p> <p>The strategy states that it aims to achieve the strategic objective of concentrating new sustainable development</p>	<p>Support welcomed.</p> <p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for</p>

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		<p>within the built-up urban areas and only utilising greenfield sites where absolutely necessary. It is clear that in order to deliver the level of housing required up to 2041, significant greenfield site releases will be required. This is the strategy of the currently adopted plan which includes strategic, sustainable greenfield site release alongside the development of brownfield sites to meet housing requirements. Indeed, at page 24 of the document it is noted that it is not prudent to accommodate all new housing development within the Borough's urban areas and that it is inevitable that greenfield areas of growth will be needed. The release of greenfield sites will play an important part of the future development strategy for the Borough, and this should be more clearly recognised in the Spatial Strategy.</p> <p>The Spatial Strategy proposes a housing figure of 5,040 dwellings over the plan period at an annual rate of 240 dwellings a year. This includes an apportionment of 52 homes a year for Leicester City's unmet needs. This level of provision is supported and reflects the evidence prepared jointly by the Housing Market Area (HMA) authorities.</p>	<p>its approach. In addition, the Council will publish background evidence to underpin its approach</p> <p>The Plan-period aligns with the base date of the LLHENA and extends to 2041 to align with the key local and strategic evidence that the Council has commissioned and delivered as part of the production of this emerging New Local Plan.</p> <p>The Council published an updated Local Development Scheme (LDS, Autumn 2024) that now seeks to consult on the Regulation 19 Pre-Submission Draft New Local Plan in Winter 2024-25, as opposed to Spring 2025, as proposed in the last iteration of the LDS.</p> <p>Once the Council submits its Plan to the Planning Inspectorate, the timetable going forward will largely be determined by Planning Inspectorate and is therefore out of local control. Therefore, the Council will keep the Plan-period set at 2020-2041 at this time.</p>
<p>Mulberry Land on behalf of Mrs B Walker (Landowner) 15th May 2024</p>	<p>Policy 1: Spatial Strategy for Development within the Borough</p>	<p>Mulberry Land are supportive of the Borough's intention to take account of Leicester City's unmet housing needs, with 52 homes from Leicester City, per year, to be accommodated within the Borough area, arising from the Statement of Common Ground Housing Option.</p> <p>Adding this to the Council's standard method housing need figure of 188 new homes per year will mean provision to be made for 240 new homes per year, or 5,040 homes between 2021- 2041 (this figure is inclusive</p>	<p>Support welcomed.</p> <p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-</p>

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		<p>of existing housing commitments). Housing completions between 2021-2023 total 488 dwellings, which leaves 4,552 dwellings for the remaining plan period to 2041, or 252 dwellings pa. This figure could increase given the estimates presented in terms of windfall allowances, smaller sites, and town centre sites, which are not reliable.</p> <p>The Council's adopted 2019 Plan planned for 148 dwellings pa between 2011-2031, equating to 2,960 dwellings during this period. To support growth, this target has experienced a steady increase. It is essential that the Council continually consider and plan for greenfield allocations, to meet this increasing supply.</p> <p>Looking at the Council's Residential Land Availability Assessment (2022/23), the amount of net housing completions since 2011, i.e. the start of the existing plan period, to 2023 totals 1,651 dwellings, with 335 net dwellings delivered during 2022/23. 335 dwellings is significantly above previous years delivery, over double the completions during 2021/22 (at 153 net). This is due to the delivery of consented land at Cottage Farm (Bloor Homes, 19/00356/OUT), land east of Welford Road, Wigston (DWH, 21/00028/OUT), and Stoughton Farm Park (18/00178.OUT).</p> <p>However, it is expected that, even though these sites are significantly boosting delivery presently, the authority will soon run out of land, i.e. this isn't a sustainable position, and additional sites will need to be consented to sustain delivery. In addition, these sites are likely 'backfilling' the low delivery rates experienced during years 2011-2014, i.e. at the start of the previous plan period, plus growth tends to reach a peak approx. 2 years after the adoption of</p>	<p>Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>the Plan.</p> <p>From 2026 onwards, projected completions begin to dip, and certainly there is a gap in supply from 2028 onwards (Table 6 - Housing Trajectory of the AMR 2023).</p> <p>This could be problematic for the Council, whereby they should be seeking additional sites now to enable a site start by this point in the future. At present the Council's own housing trajectory suggests that completions are due to significantly drop beyond 2027 to a level where they would fall to around 150 homes pa.</p> <p>Should the town centre allocations in Wigston and Oadby still not come forward that figure will drop to around 110 homes pa. Furthermore, of those 110 they are likely to be delivered off a single site – Wigston Growth Area – phase 2. Based on the LDS (March 2024) with adoption due Summer / Autumn 2026 there is a serious risk that the Council will seek a significant fall in housing delivery during this period without proactive action now.</p> <p>In that context and given the time lag to submit a planning application, discharging conditions, and delivery of homes, the Council should positively engage with landowners who put sites forward which are in conformity with the emerging plan and objectives. These measures are required to simply sustain housing delivery to current levels, whereas the increased housing need figures of 240 homes pa will only manifest the problem.</p> <p>32 options have been put forward via call for sites exercises to accommodate growth, resulting in land capable of accommodating approx. 5,600 homes. These</p>	

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		<p>will of course not all be achievable, and the 32 sites have not yet been fully assessed, indeed some sites are not deliverable.</p> <p>For example, the accompanying Sustainability Appraisal report confirms that “In terms of the least sustainable options within Oadby and Wigston, sites OAD001 and WIG009 are located within greenfield land and are within flood zones 2 and 3”. Not to mention a high number of sites included within areas of Green Wedge. Thus, this exercise included some hugely constrained sites which cannot be relied upon for growth opportunities.</p> <p>We propose that, in order to meet unmet need from Leicester City, the well-connected settlement of Oadby should be viewed favourably given its close ties with the City, and that there is demonstrated availability of sites within close proximity of Leicester’s established need to accommodate additional growth.</p> <p>We are supportive of the Council’s Vision to deliver well-designed, beautiful, and high-quality development that will meet needs, that will continue raising the level in terms of environmental standards, quality of life and local distinctiveness.</p> <p>Although we, in the main, support the Spatial Strategy for Development, there is an objection that concentrating new sustainable development within the built-up areas and only utilising greenfield sites ‘where absolutely necessary’ won’t meet the Council’s ambitions in terms of delivering growth, plus taking account of Leicester City’s unmet needs, specifically housing.</p>	

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		<p>Achieving growth from built up areas is complex and problematic to achieve, plus these tend to be smaller scale infill sites which are, by their nature, constrained. As an example, previous Local Plan Allocations within the PUA have not come forward as the Council had expected and was set out in Figure 1 – Local Plan Housing Trajectory (adopted Local Plan April 2019). In that table it was anticipated that 160 new homes would have been delivery by now (205 by 2026) however it is understood that in most cases the sites have not had any planning applications submitted as yet. Despite this, the Council's current Local Plan has performed well where most housing completions have come from Direction for Growth locations.</p> <p>For instance, in the reporting period 22-23; 324 (91%) of the total net housing additions of 355 were from Direction of Growth Areas. In the same period the Council recorded the highest number of affordable housing completions within the plan period since 2011 of 118 homes. The Council must therefore ensure it balances the regeneration opportunities within the urban areas along with additional Greenfield development, particularly given the increased housing requirement and pressures (meeting new mandatory Biodiversity Net Gain standards) through the emerging plan.</p> <p>When releasing greenfield development and acknowledging the challenges afforded to the Council in having limited land within the district boundary and maintaining the quality of the landscape environment for existing and new residents, Green Wedges should be afforded significant protection, acknowledging the strategic role they play. The Council should focus on ensuring that</p>	

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		<p>any land released for development maximises the development opportunities through the effective use of land (paragraph 123 and 124 NPPF) considering appropriate housing densities and best utilisation of development land, taking account of technical and environmental constraints.</p>	
<p>Stantec on behalf of Bloor Homes Limited and the Pierce Family (Landowners) 15th May 2024</p>	<p>Policy 1: Spatial Strategy for Development within the Borough</p>	<p>Policy 1 sets out the broad approach to overall scale of development in the borough. The text within the consultation document suggests the desired policy direction and approach of the Council. In the case of our representation, we wish to acknowledge and comment on the Council’s approach to ‘New Homes’.</p> <p>Paragraph 60 of the NPPF states that the “overall aim should be to meet as much of an area’s identified housing need as possible, including with an appropriate mix of housing types for the local community”. Paragraph 61 outlines that to determine the minimum number of homes needed strategic policies should be informed by local housing need assessment, conducted using the standard method.</p> <p>Point 1.4.6 and 1.4.7 of the Preferred Options document reasserts the housing need of the borough, confirming that the “standard method housing need figure of 188 new homes per year”, reflective of figures set out within the Leicester and Leicestershire HENA (2022). This is a minimum requirement of local need and, we add, should be the starting point for determining the amount of housing to be planned for.</p> <p>Paragraph 61 of the NPPF goes on to confirm that: “In addition to the local housing need figure, any needs that</p>	<p>The Leicester and Leicestershire Statement of Common Ground (June 2022) establishes that the agreed position across all of the Authority areas is based upon a clear evidence-based approach, on the back of a long track record of effective joint working on strategic matters. Indeed, all of the Authorities continue to engage on an ongoing basis in this manner.</p> <p>At the time of signing, the Government’s standard method for calculating housing need suggested that the Leicester and Leicestershire need was to provide 91,408 homes (5,713 per year, 2020 to 2036). For the Borough of Oadby and Wigston, this figure equated to 188 dwellings per annum.</p> <p>In addition to that, an agreed approach to redistributing Leicester City’s unmet need of 18,700 homes over the plan-period 2020-2036 was also set out, seeing an apportionment of 52 dwelling per annum for Oadby and Wigston Borough Council.</p> <p>The SoCG stated that it was agreed by all Authorities that these figures are subject to testing through each individual Local Planning Authority’s plan making process.</p>

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		<p>cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for". Therefore, in addition to local need, consideration must be given to addressing the unmet needs of neighbouring authorities and it is now well established that Leicester City Council are unable to meet their own housing needs. Indeed, Oadby and Wigston, along with other Leicestershire authorities, has made a commitment to contribute towards meeting this shortfall in the Leicester and Leicestershire Statement of Common Ground (2022). It is positive to see that point 1.4.6 in the Preferred Options document and the 'New Homes' text at Policy 1 both recognise this requirement to deliver additional unmet needs of Leicester City. However, the figure within the Preferred Options document of '52 additional homes per year' is taken from the HENA 2022 and is based upon evidence that extends to 2036. The Council suggest at point 1.4.7 of the Preferred Options document that they "would not be planning proactively" if the apportioned 52 homes per year was not taken into account for the additional Local Plan period to 2041. We agree, there needs to be recognition that Leicester City housing need will need to extended to cover the Plan period.</p> <p>Based on the Preferred Options document setting out a local need for 188 homes, plus 52 homes to meet Leicester's unmet need, this equates to a total requirement for 240 homes per annum, (5,040 homes across the plan period. However, within the supporting Sustainability Appraisal (March 2024) (SA) the council have undertaken review of three different options for their housing growth target. At this stage, the boroughs growth needs are not confirmed as the evidence base is still</p>	<p>It has subsequently been agreed by all Leicester and Leicestershire local authorities that in absence of any evidenced approach to deal with the period 2036-2041, each local authority would roll-forward the apportionment figure of Leicester City's unmet need.</p> <p>Combined, this represented a maximum growth figure of up to 240 dwellings per annum for the Borough of Oadby and Wigston. Over a plan period of 2020 – 2041, this figure represents 5,040 dwellings in the Borough.</p> <p>OWBC has subsequently tested three growth rates (for housing) through emerging evidence over its Plan period of 2020-2041. The lowest growth figure of 188 dpa (the then Standard Method figure); a upper growth figure of 240 dpa (as per the SoCG); and, a median figure of 214 dpa.</p> <p>Taking account of all evidence, the Council is taking forward the upper growth figure of 240 dpa, equating to 5,040 dwellings in total to be provided over the Plan-period of 2020-2041 in the Borough. This growth strategy represents the most appropriate for the Borough of Oadby and Wigston.</p> <p>The need figure of 240 dpa has been agreed with all other Leicester and Leicestershire authorities and therefore amendments to the growth figure would need to be agreed by all Partners across the County and tested via the Council's evidence to support the Regulation 19 Pre-Submission Draft Plan.</p>

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		<p>emerging. On the basis of current evidence the following options have been identified:</p> <ul style="list-style-type: none"> - Statement of Common Ground Housing Option – 240 dwellings per annum (5,040 homes over the plan period) - Middle ground housing option - 214 dwellings per annum (4,494 homes over the plan period) - Standard Methodology option - 188 dwellings per annum (3,948 homes over the plan period) not taking account of Leicestershire’s unmet need <p>The Council have not yet confirmed which option is being pursued and whilst all three options represent a greater planning housing delivery than the current adopted Local Plan (148 dwellings per annum), none of the options appear particularly ambitious and especially given the Leicester and Leicestershire Economic Growth Strategy (2021 – 2030).</p> <p>The Council have summarised within the SA that Option 2 which is for a ‘Middle ground’ housing option of 214 homes per annum (4,494 homes across the plan period) ‘performs the best overall’. We are concerned that this number, 214 dwellings per annum, does not account for the local need and the unmet apportionment. Planning for 240 homes per annum needs to be a minimum for the Local Plan to demonstrate a commitment to the statement of common ground and meeting the objectively assessed housing need. Given that ‘uncertainty remains’ in relation to housing growth that needs to be provided for as this needs to be determined by emerging evidence. The 240 homes per year figure is drawn from the 2022 HENA which is based upon 2021 evidence/data. The figures</p>	

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		<p>within this are already three years old and, according to the Local Development Scheme the figures will be 4 years old by the time the Regulation 19 consultation commences (anticipated Spring 2025).</p> <p>The housing number currently set out in the Preferred Options document and tested within the SA is going to be 'confirmed' following new evidence. The basis for 52 homes per year for Leicester City's unmet need is applied in the absence of any declaration of unmet need by Leicester City Council beyond 2036 and upon a standard method calculation derived from a dated evidence base (2021/2022 HEDNA data). It is highly likely that needs will be found to be higher than 240. We would like to see the Council being ambitious in their approach to housing delivery, developing this local plan positively and proactively, identifying suitable residential development sites for allocation which can provide more than the 5,040 homes 'required'. This is particularly important given the HENA demonstrates a considerable affordable housing need, amounting to 203 dwellings per annum for both affordable home ownership and affordable rent. This need alone represents over 85% of the proposed housing requirement. Consequently, the Council will fail to address affordable housing needs unless the housing target is increased.</p> <p>The Council set out concerns/constraints for the three housing delivery options with 'negative impacts' including the inability to meet scale of housing development needs on brownfield land in existing urban areas and pressure on existing infrastructure. Whilst viability testing on aspects like this will need to be undertaken, we do not think these factors should prevent the council from being more</p>	

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		<p>ambitious in their approach to housing delivery. Our site which is 31.4 Hectares of Grade 3 agricultural land is large enough to accommodate over 500 dwellings.</p> <p>Demonstrating how 'greenfield' land to the southeast of Wigston presents an opportunity to meet need beyond the urban core. The benefits of considering allocation of this site is that, due to it's scale, contributions to essential infrastructure where appropriate and needed could be facilitated through development.</p> <p>The Preferred Options Local Plan sets out that the population of Oadby and Wigston has grown 2.7% between 2011 to 2021. This is a fairly modest growth compared with the data contained within the Leicester & Leicestershire HENA (2022) relating to other boroughs within the Housing Market Area, however it is pertinent to note that the HENA establishes change in population between 2011 and 2019. For Oadby and Wigston the change within this 8 year period was an increase of 1.9%. Taking the difference between the Preferred Options change of 2.7% in 10 years against the HENA change of 1.9% in 8 years, this means that the population of Oadby & Wigston has seen an increase of 0.8% in the most recent two recorded years (2019 to 2021) which, as a proportion of the total increase is significant.</p> <p>The current HENA is based upon outdated evidence and work must be undertaken by the council to obtain more current growth rate projections which will feed directly into establishing housing need. We would suggest that, on the basis of a higher growth rate in the most recent two reviewed years, that Oadby & Wigston should be planning positively for more housing than would be needed by the current Objectively Assessed Housing Need. In order to</p>	

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		<p>do this, more sites need to be considered for allocation in the local plan. Our site which is of significant size (31.4 Hectares with a developable area achieving approx. 500 dwellings), appropriately located, has no identified constraints and a potential point of access that is not dependent on third party land, presents an ideal opportunity for allocation large enough to accommodate 500 homes and so would make a significant contribution to addressing housing need.</p>	
<p>Stantec on behalf of the Co-operative Group and the University of Leicester</p> <p>14th May 2024</p>	<p>Policy 1: Spatial Strategy for Development within the Borough</p>	<p>Turning to matters of housing delivery, notwithstanding the issues around a lack of strategy direction as detailed above, the draft Local Plan indicates within Policy 1 (Spatial Strategy for Development within the Borough), that the Council will deliver 240 dwellings per annum, comprising 188 dwellings derived from the Standard Method calculation, plus 52 dwellings per annum to address Leicester City's unmet housing need, equating to 5,040 new homes over the Plan period up to 2041.</p> <p>Our Clients note that the Standard Method figure stated in the Draft Local Plan is now out of date and does not account for the updated affordability ratio which, in the case of Oadby and Wigston, increases the requirement from 188 to 198 dwellings per annum, when factoring in the additional delivery for Leicester City, this would increase the requirement to 250 dwellings per annum, equating to 5,250 new homes over the Plan period. This increased level of housing need heightens the necessity for the Council to determine its ability to deliver it; which is currently lacking in the Draft Local Plan.</p> <p>The evidence base behind the emerging Local Plan currently consists of four documents. The specific nature</p>	<p>The Leicester and Leicestershire Statement of Common Ground (June 2022) establishes that the agreed position across all of the Authority areas is based upon a clear evidence-based approach, on the back of a long track record of effective joint working on strategic matters. Indeed, all of the Authorities continue to engage on an ongoing basis in this manner.</p> <p>At the time of signing, the Government's standard method for calculating housing need suggested that the Leicester and Leicestershire need was to provide 91,408 homes (5,713 per year, 2020 to 2036). For the Borough of Oadby and Wigston, this figure equated to 188 dwellings per annum.</p> <p>In addition to that, an agreed approach to redistributing Leicester City's unmet need of 18,700 homes over the plan-period 2020-2036 was also set out, seeing an apportionment of 52 dwelling per annum for Oadby and Wigston Borough Council.</p>

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		<p>of these will be discussed further, as appropriate, later within these Representations. Whilst it is noted that the Council confirms that the evidence base is currently being updated to inform the Local Plan, it is rather disappointing that this has not evolved further. As per the comments above, the lack of evidence appears to have perpetuated a 'Preferred Options' draft Local Plan which does not provide a range of growth options, and therein nor does it provide a preferred option.</p> <p>It is not possible, at this stage, to provide any substantive comments on the growth strategy or the evidence base that underpins the Plan and, if the timeline set out at paragraph 1.7.2 of the draft Local Plan is to be achieved, then the next opportunity to assess this will be as part of the pre-submission version in Spring 2025.</p> <p>Notwithstanding this, our Clients support the Council's intention to progress the evidence base over the coming months and will support officers where possible in relation to the land interests highlighted at the outset of these representations.</p>	
<p>Stantec on behalf of the Co-operative Group and the University of Leicester</p> <p>14th May 2024</p>	<p>Policy 1: Spatial Strategy for Development within the Borough</p>	<p>Policy 1: Spatial Strategy for Development within the Borough (Strategic)</p> <p>Our Clients are generally supportive of the provisions of Policy 1, notwithstanding their concerns around the growth strategy (or lack thereof) outlined within Section 2. As also indicated within Section 2 above, the 'Policy' contains development requirements, including the provision of new housing up to 2041, but provides no indication as to how this will be achieved. Whilst our Clients welcome the acknowledgement within the wording that the Council must look towards greenfield sites to meet its housing</p>	<p>The Leicester and Leicestershire Statement of Common Ground (June 2022) establishes that the agreed position across all of the Authority areas is based upon a clear evidence-based approach, on the back of a long track record of effective joint working on strategic matters. Indeed, all of the Authorities continue to engage on an ongoing basis in this manner.</p> <p>At the time of signing, the Government's standard method for calculating housing need suggested that the Leicester and Leicestershire need was to provide 91,408 homes (5,713 per year, 2020 to 2036). For the</p>

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		<p>requirement, the lack of a locational growth strategy, or indeed the identification of any general areas for growth gives no clarity, or certainty as to whether this requirement is deliverable.</p> <p>Under the 'New Homes' section of the policy, the Council state that:</p> <p><i>"Taking account of the Regulation 18B Site Options available to the Council, on the face of it, there is potential capacity for approximately 5,600 new homes. However, it should be noted that none of the sites submitted have yet been assessed for their appropriateness. Also the Council has not fully developed the suite of evidence that would underpin the new Local Plan and its growth areas, for example the South Leicestershire Transport Assessment or wider Strategic Transport Assessment.</i></p> <p><i>Evidence bases such as these will highlight to the Council, which growth areas will be the most appropriate and ultimately which of the sites submitted can potentially be allocated for development. The suite of evidence being produced will take into account the impacts of growth within the Borough area, but not in isolation. It also takes account of the potential growth occurring within neighbouring local authorities which will have cross boundary implications for the Borough area. Only when this suite of evidence base has been completed will the Council know the full extent of the impact of growth, and the infrastructure that is needed to fulfil such growth; and then the annual new home provision target."</i></p> <p>In many ways, this statement highlights the crux of our Clients concerns, in that the Council is progressing a new</p>	<p>Borough of Oadby and Wigston, this figure equated to 188 dwellings per annum.</p> <p>In addition to that, an agreed approach to redistributing Leicester City's unmet need of 18,700 homes over the plan-period 2020-2036 was also set out, seeing an apportionment of 52 dwelling per annum for Oadby and Wigston Borough Council.</p> <p>The SoCG stated that it was agreed by all Authorities that the these figures are subject to testing through each individual Local Planning Authority's plan making process.</p> <p>It has subsequently been agreed by all Leicester and Leicestershire local authorities that in absence of any evidenced approach to deal with the period 2036-2041, each local authority would roll-forward the apportionment figure of Leicester City's unmet need.</p> <p>Combined, this represented a maximum growth figure of up to 240 dwellings per annum for the Borough of Oadby and Wigston. Over a plan period of 2020 – 2041, this figure represents 5,040 dwellings in the Borough.</p> <p>OWBC has subsequently tested three growth rates (for housing) through emerging evidence over its Plan period of 2020-2041. The lowest growth figure of 188 dpa (the then Standard Method figure); a upper growth figure of 240 dpa (as per the SoCG); and, a median figure of 214 dpa.</p> <p>Taking account of all evidence, the Council is taking forward the upper growth figure of 240 dpa, equating to</p>

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		<p>Local Plan without any up-to-date evidence or clear understanding of how it will meet its development needs, or indeed if it is capable of doing so, other than generalised statements around the constrained nature of the Borough and the need to develop greenfield land. Whilst it is helpful to understand what sites have been submitted to the Council for consideration, it is likely that some of these will not come forward or will not be suitable for allocation. In the absence of any consideration by the Council, which it has indicated above, it is not possible to say whether the Council will be capable of meeting its development needs, or indeed, assist with meeting the unmet need of Leicester City. This goes to the heart of the growth strategy and to the Plan itself, and so is a key piece of the jigsaw puzzle, which is currently missing.</p> <p>Additionally, and as stated previously, the aforementioned housing requirement will now need to reflect the increased figure provided by the Standard Method, that has arisen as a result of the recently published amended affordability ratios.</p> <p>Whilst our Clients are fully supportive of the Council's aims and aspirations to meet development needs in a sustainable manner, and its aspiration to meet its own needs and that of neighbouring Leicester, it clearly needs to ascertain whether this is in fact possible in terms of how and where the homes can be delivered.</p>	<p>5,040 dwellings in total to be provided over the Plan-period of 2020-2041 in the Borough. This growth strategy represents the most appropriate for the Borough of Oadby and Wigston.</p> <p>The need figure of 240 dpa has been agreed with all other Leicester and Leicestershire authorities and therefore amendments to the growth figure would need to be agreed by all Partners across the County and tested via the Council's evidence to support the New Local Plan.</p>
Define Planning and Design on behalf of Bloor Homes	Policy 2: Regeneration and Large Scale Change	<p>POLICY 2: REGENERATION AND LARGE SCALE CHANGE:</p> <p>BHL recognises the intention of Policy 2 in terms of ensuring high-quality and comprehensive design in larger-</p>	<p>Wording is indicative of need to address design issues in a coherent way. It is not a prescriptive approach.</p>

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Limited, 14 th May 2024		<p>scale developments. However, it is noted that some developments over 100 dwellings would be delivered within a single phase by a single developer, through a single full planning application. In those circumstances, it would not be appropriate to require a design code or a phasing plan, as there would be no future phases to code for. In those circumstances, the matters raised within the policy could simply be considered in the Development Brief / Design and Access Statement.</p> <p>Therefore, it is suggested that the policy is caveated appropriately.</p>	
Fisher German on behalf of David Wilson Homes East Midlands 14 th May 2024	Policy 2: Regeneration and Large Scale Change	<p>Policy 2: Regeneration and Large Scale Change (Strategic):</p> <p>Our client supports the aim and overall function of this Policy, which follows best practice on the delivery of strategic sites.</p> <p>In relation to our client's interests at Wigston Meadows, there is a particular opportunity at this stage to "prioritise street based growth of existing adjacent places rather than 'tagged' on separate development areas", as requested in the fourth bullet point, as the illustrative masterplan for Phase 2 has been designed in a way in which Phase 3 would form a natural extension of the site contributing to the creation of a coherent place rather than the sense of tacked on estates which can be the case elsewhere. The earlier there is confirmation in the Development Plan confirming Phase 3, the better this can be reflected in the Reserved Matters applications for eastern Phase 2, due to the increased security provided that the future Phase would be supported.</p>	Support welcomed.

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<p>G Longley Planning and Property Services on behalf of Davidsons Developments Ltd</p> <p>14th May 2024</p>	<p>Policy 2: Regeneration and Large Scale Change</p>	<p>We previously made comments at the Issues and Options consultation in relation to this proposed policy and the definition of 'large scale' development. The Preferred Options consultation now defines large scale change as either 100 dwellings or more or of 5 hectares or more, where the Council will require the production of a masterplan, development brief, design code and phasing plan.</p> <p>This is a more appropriate approach and would not require the production of masterplans for sites of less than 100 dwellings which was previously the case and is therefore supported.</p> <p>For the land west of Welford Road, as part of the outline planning application and Design and Access Statement and Masterplan has been prepared to demonstrate how the development will come forward to contribute to the delivery of sustainable development and place making.</p>	<p>Support welcomed.</p>
<p>G Longley Planning and Property Services on behalf of Westernrange Limited, Jelson Homes and David Wilson Homes</p> <p>14th May 2024</p>	<p>Policy 2: Regeneration and Large Scale Change</p>	<p>We previously made comments at the Issues and Options consultation in relation to this proposed policy and the definition of 'large scale' development. The Preferred Options consultation now defines large scale change as either 100 dwellings or more or of 5 hectares or more, where the Council will require the production of a masterplan, development brief, design code and phasing plan.</p> <p>This is a more appropriate approach and would not require the production of masterplans for sites of less than 100 dwellings which was previously the case and is therefore supported.</p>	<p>Support welcomed.</p>

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		<p>For the land north of Newton Lane, a Vision Document, Masterplan and Landscape Framework Plan have been prepared to demonstrate how the development can come forward without impact on the Green Wedge and help contribute to the future housing requirements in the Borough.</p>	
<p>Mulberry Land on behalf of Mrs B Walker (Landowner) 15th May 2024</p>	<p>Policy 2: Regeneration and Large Scale Change</p>	<p>We are supportive of the policy text for Policy 2: Regeneration and Large-Scale Change (Strategic). We appreciate that scale of development crucially needs to respond to its surroundings and demonstrate the interaction of uses.</p> <p>We would however suggest the policy wording should be reviewed as the production of a development brief and design code for qualifying developments would appear particularly onerous (for applicant and the Council) and it would be more appropriate to reiterate that planning applications relating to qualifying criteria (100 homes or more, 1,500 sq.m of floor space or 5 ha) must deal with the matters as set out within the bullet points.</p>	<p>Support welcomed.</p> <p>Wording is indicative of need to address design issues in a coherent way. It is not a prescriptive approach.</p>
<p>Stantec on behalf of Bloor Homes Limited and the Pierce Family (Landowners) 15th May 2024</p>	<p>Policy 2: Regeneration and Large Scale Change</p>	<p>We support the Council in their approach to large scale regeneration schemes and it is positive to see acknowledgement of the benefits that large scale development brings to secure sustainable development, compliant with the NPPF three key objectives (paragraph 8 a to c) and the presumption in favour of sustainable development.</p> <p>The council set out requirements for large scale developments, 100 homes or more, when applications are submitted. These requirements include consultation in the</p>	<p>Support welcomed.</p> <p>The Council consider that this Policy is helpful by providing a list of requirements to support large scale proposals, all in one Policy and provides reassurance to the public that relevant parties are consulted for their expertise.</p>

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		<p>form of 'earliest liaison between the applicant, the Borough Council and Leicestershire County Council Highways Department and Education Department is essential' and for submission of:</p> <ul style="list-style-type: none"> - A masterplan - Development brief - Design code - Phasing plan - Transport assessment <p>We concur with the council that consultation and submission of these documents will ensure that the best possible developments are permitted within the borough that contribute 'sense of place' and are appropriate in their context. Notwithstanding this, these requirements are already set out within national policy.</p> <p>Regarding 'consultation' NPPF chapter 4 'Decision-making' and paragraph 41 set out the need for early engagement. Schedule 4(c) of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (TCP DMPO) requires 'development likely to affect land in non-metropolitan county...' must consult the county planning authority concerned. In the case of applications submitted in Oadby & Wigston which sits within a non-metropolitan county (Leicestershire), consulting with Leicestershire County Council is therefore a statutory requirement. Furthermore, Schedule 4(g)(h)(i) of the TCP DMPO establishes that the local highway authority need to be consulted on any development which is not minor development.</p> <p>In terms of documents required for large scale</p>	

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		<p>developments, the five listed documents within Policy 2 are not onerous and are not unexpected. The NPPF paragraph 74c establishes that ‘appropriate tools such as masterplans and design guides or codes are used to secure a variety of well design and beautiful homes’. The council already require developments to submit Design and Access Statements and it is common practice that a DAS will include a masterplan. With regard to the requirement for a Transport Assessment, the NPPF paragraph 117 already requires this, in addition to a Travel plan, for all developments that will ‘generate significant amounts of movement’. Any ‘major development’ over 100 homes is likely to generate significant movements.</p> <p>Clearly, the requirement for consultation and engagement is already established in national policy and applicants submitting proposals for ‘major’ sites will expect to undertake engagement and consultation in alignment with these policies. Indeed, regarding our site, which could deliver 500 homes, we are content that the requirements contained within proposed Policy 2 are sufficiently covered in existing wider policies and so do not need to be repeated within the Local Plan.</p> <p>We consider that the council should omit this policy which duplicates existing national policy. We note that the council do not currently have a Local Validation Checklist document. The advice available references a general government guidance document which was published in 2010 (Communities and Local Government: Guidance on information requirements and validation (March 2010)) and has been withdrawn. Given this, we would recommend that the Council look to prepare a Local Validation Document to cover all different types of</p>	

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		<p>applications and requirements for each. This would assist applicants in submitting the correct documentation and preventing delays to the decision making process caused by the council having to invalidate applications.</p>	
<p>Stantec on behalf of the Co-operative Group and the University of Leicester</p> <p>14th May 2024</p>	<p>Policy 2: Regeneration and Large Scale Change</p>	<p>Policy 2: Regeneration and Large Scale Change (Strategic)</p> <p>Our Clients support the overarching aims of Policy 2, which seeks the highest quality large-scale developments and regeneration schemes.</p> <p>Our Clients are concerned however that the Policy takes no account of viability matters in stipulating what is required with a submission. Whilst this may be covered by other Policies within the Plan, they also consider that it should form part of Policy 2. Policy 2 applies to greenfield developments, as well as large-scale regeneration schemes, which are often complex and challenging to deliver. Large-scale greenfield development, as well as urban regeneration schemes, face significant infrastructure costs in order to be deliverable. The Policy should, therefore, include suitable caveats to allow for a deviation on the nature of a proposed development should there be site-specific, and viability matters which warrant a change in approach. This should ensure that otherwise sustainable developments are not unnecessarily stalled.</p> <p>Finally, our Clients also note the penultimate paragraph of the Policy, which states: “<i>Where large scale change is proposed, the earliest liaison between the applicant, the Borough Council and Leicestershire County Council Highways Department and Education Department (and Leicester City Council where relevant) is essential.</i>”</p>	<p>Support welcomed.</p> <p>Additional text has been included in the Policy to incorporate reference to ‘exceptional circumstances’ where the Council will consider a variation to the Policy approach.</p> <p>The word ‘<i>essential</i>’ has been replaced with ‘<i>strongly encouraged</i>’. Although not a statutory requirement, the Council does consider early engagement with key Partners as an essential step in the process but acknowledge that this cannot be a mandatory requirement in this context.</p>

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		<p>Whilst our Clients are fully supportive of the sentiment of this statement, and would, of course seek to engage with the Council in advance of any application submission, they would urge caution in respect of the word “essential”. There is no statutory requirement to request pre-application advice, although it is good practice in some instances to do so. However, we consider that the policy as drafted is overly prescriptive and 'essential' should be replaced with encouraged.</p>	
<p>Define Planning and Design on behalf of Bloor Homes Limited, 14th May 2024</p>	<p>Policy 3: Infrastructure and Developer Contributions</p>	<p>POLICY 3: INFRASTRUCTURE AND DEVELOPER CONTRIBUTIONS:</p> <p>The proposed approach of requiring development to be supported by, and make contributions towards, the provision of new physical, social and green infrastructure to mitigate its impacts is appropriate. In that regard, BHL note the importance of identifying the infrastructure delivery requirements that are associated with specific allocations and the plan more generally as early as possible, and considering how infrastructure delivery should be funded. That is particularly important given the current position that is being experienced in Leicestershire in relation to strategic highway contributions, for example.</p> <p>As recognised in the LPPO, the expected developer contributions / cost of on-site infrastructure should then be considered through a comprehensive Viability Assessment that considers the cumulative costs of the plan’s policy requirements. BHL recommends that the plan clearly sets out its priorities in terms of contributions / policy compliance for circumstances where development sites would be unviable if they were to be entirely policy</p>	<p>The Council has undertaken a Whole Plan Viability Assessment as part of the suite of evidence to support its Regulation 19 Pre-Submission Draft Plan.</p> <p>Developer Contributions and infrastructure delivery will vary with individual applications and site allocations, and therefore, the Council does not wish to be prescriptive with regards to any form of prioritisation of delivery.</p> <p>Therefore, if appropriate, this discussion can take place via negotiations as part of a future planning application.</p>

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		<p>compliant.</p> <p>BHL also note that the Government intends to introduce a new Infrastructure Levy (as referred to in the Levelling Up and Regeneration Act) that may offer an opportunity to deliver the infrastructure required to support new development in a more efficient manner.</p>	
<p>Mulberry Land on behalf of Mrs B Walker (Landowner)</p> <p>15th May 2024</p>	<p>Policy 3: Infrastructure and Developer Contributions</p>	<p>Policy 3 looks to ensure that specific issues arising from development can be mitigated.</p> <p>Through our planning application at Oadby Grange (22/00448/OUT) we have recently updated the Transport Assessment and Travel Plan. The TA assesses the cumulative number of homes accessed from a single point of access and presents an analysis of junctions along the A6. The mitigation set out within the TA, and previously agreed with the Highways Authority confirmed that the application at Oadby Grange was able to demonstrate that safe and suitable access could be delivered, in line with Paragraph 114 of the NPPF 2023. Conditions were recommended to mitigate any impact of the development, which includes delivery of part of the South of Leicester Area Local Cycling and Walking Infrastructure Plan (LCWIP).</p> <p>In accordance with emerging Policy 3, our planning application has identified any impacts on surroundings, and will deliver the necessary infrastructure to mitigate that impact. In addition, we will continue to work with the Council and statutory consultees to ensure the infrastructure items set out under paragraph 4.6.4 of the draft plan will be catered for.</p>	<p>Support welcomed.</p>

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		<p>We are supportive of the IDP and welcome the opportunity to engage further with the Council regarding the infrastructure project list. We expect this to highlight some improvement works required along the A6, particularly to deliver additional growth to the east of Oadby.</p>	
<p>Stantec on behalf of Bloor Homes Limited and the Pierce Family (Landowners)</p> <p>15th May 2024</p>	<p>Policy 3: Infrastructure and Developer Contributions</p>	<p>We support the Council in Policy 3 where they seek to ensure that planning specific issues can be mitigated through planning conditions and developer contributions and we largely agree with the proposed wording of the Policy. Our site, located east of the Wigston Meadows and along the accepted eastern growth trajectory would be able to accommodate 500 homes and contribute to infrastructure requirements therefore presents an important opportunity for allocation.</p> <p>Notwithstanding our general support, we do note that viability testing for this local plan and proposed policies has not yet been undertaken. In the Policy 3 commentary, the Council acknowledge that “National guidance is clear that the viability considerations of the policy requirements for all contributions, including affordable housing and open space, sport and recreation facilities, should be considered as a whole with other policy requirements, such as all infrastructure contributions”.</p> <p>Having undertaken a thorough review of the Preferred Options Document we would respectfully suggest that the combination of policies included within this Local Plan which require developers to make specific contributions (on-site or off-site) coupled with new statutory requirements for BNG (as of February 2024 for major sites and April 2024 for minor sites) may render many residential sites unviable. If sites are found to be unviable</p>	<p>Support welcomed.</p> <p>The Council has undertaken a Whole Plan Viability Assessment as part of the suite of evidence to support its regulation 19 Pre-Submission Draft Plan.</p> <p>Developer Contributions and infrastructure delivery will vary with individual applications and site allocations, and therefore, the Council does not wish to be prescriptive with regards to any form of prioritisation of delivery.</p> <p>Therefore, if appropriate, this discussion can take place via negotiations as part of a future planning application.</p>

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		<p>then they cannot be considered ‘achievable’ or ‘deliverable’ and therefore could not reasonably come forward as allocation within the plan. This will in-turn jeopardise delivery of housing and a failure of the borough to meet the Housing Need.</p> <p>In light of this, we hope to see that, as the plan progresses, and viability evidence becomes available that policies are amended to ensure they are complementary and justified.</p> <p>It is important that the requirements of one policy do not compromise delivery of another (refer to our response to Policy 12 at point 2.7.5) and that additional sites are considered for allocation to ensure sufficient number of residential allocations come forward through the Local Plan to meet housing need (as a minimum). Our site, which is of significant size (31.4 Hectares with a developable area with potential for approx. 500 dwellings), appropriately located, has no identified constraints and a potential point of access should be considered as a preferable site for allocation. It is also capable of providing 10% BNG on site. It’s size would mean that in viability terms, contributions towards infrastructure would be more achievable.</p>	
<p>Stantec on behalf of the Co-operative Group and the University of Leicester</p> <p>14th May 2024</p>	<p>Policy 3: Infrastructure and Developer Contributions</p>	<p>Policy 3: Infrastructure and Developer Contributions (Strategic)</p> <p>At paragraph 4.6.5 of the explanatory text to Policy 3, the Plan states that “<i>The Council will develop an Infrastructure Delivery Plan (IDP) that will contain a ‘live’ infrastructure project list. The document will seek to identify all local and strategic infrastructure deemed necessary to support</i></p>	<p>Support welcomed.</p> <p>The Council has undertaken a Whole Plan Viability Assessment as part of the suite of evidence to support its Regulation 19 Pre-Submission Draft Plan.</p>

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		<p><i>sustainable delivery of growth in the Borough over the plan period to 2041</i>". Our Clients are supportive of planning the necessary infrastructure to support the level of growth proposed within the Plan. It is essential however that any such infrastructure is fully evidenced and justified, as well as demonstrating its deliverability. Without this, the plan would not be found sound as the requirements would not be justified. Clearly, the IDP is a key component of this and so it is essential that the Council publish this for consultation as soon as possible.</p> <p>Linked to their comments in respect of Policy 2 above, our Clients welcome the provisions at paragraphs 4.6.11 to 4.6.16, which account for exceptional, site-specific circumstances whereby development viability can be factored into development proposals. This is essential in ensuring that otherwise suitable and sustainable development is not unnecessarily stalled, resulting in delays to the delivery of much needed homes, employment development and infrastructure. Whilst this is suitably addressed by Policy 3, as indicated above, our Client would welcome suitable provisions, or a link to Policy 3, included within other relevant policies.</p> <p>Turning to Policy 3 itself, our Client has no comment to make in respect of the Policy as drafted, and considers it to be an appropriate approach to emerging policy within the Plan. They would stress however that the Policy is intrinsically linked with the IDP, which is yet to be prepared, and so they reserve the right to make further representations to the Policy, and to the IDP in the future upon its publication.</p>	<p>Developer Contributions and infrastructure delivery will vary with individual applications and site allocations, and therefore, the Council does not wish to be prescriptive with regards to any form of prioritisation of delivery in this context.</p> <p>Therefore, if appropriate, discussion can take place via negotiations between applicant and the Council as part of any future planning applications.</p>

Chapter 5 – Combating Climate Change (Policies 4, 5, 6, 7, and 8)

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<p>Define Planning and Design on behalf of Bloor Homes Limited,</p> <p>14th May 2024</p>	<p>Policy 4: Sustainable Development</p>	<p>POLICY 4: SUSTAINABLE DEVELOPMENT:</p> <p>Whilst the proposed wording for Policy 4 is similar to the NPPF’s presumption in favour of sustainable development, there are subtle differences in the language used that could be open to interpretation. To avoid mis-interpretation or inconsistencies with the NPPF’s tests, this policy should be deleted. That would also avoid the policy becoming out-of-date itself if national planning policy and guidance is updated in the plan period.</p>	<p>The Council considers the Policy to be necessary to demonstrate its commitment to delivering sustainable development in the Borough.</p>
<p>Define Planning and Design on behalf of Bloor Homes Limited,</p> <p>14th May 2024</p>	<p>Policy 5: Climate Change</p>	<p>POLICY 5: CLIMATE CHANGE:</p> <p>The intention of Policy 5, in terms of supporting sustainable development, is recognised and supported by BHL.</p> <p>However, it is noted that bullet point 1 states that “proposals are expected to reduce the amount of energy used in construction and operation of buildings and improve energy efficiency [...] to contribute to achieving net carbon zero.” The policy itself does not refer to specific dates in that regard and it is, therefore, open to interpretation as to whether net carbon zero (“NCZ”, which is a significant requirement) is required from the adoption of the plan.</p> <p>For the avoidance of doubt, BHL’s clear position is that the OWLP should not require developments to achieve net carbon zero (NCZ) at its outset, and instead should align with national requirements in terms of energy efficiency</p>	<p>Support welcomed.</p> <p>Policy has been amended to reflect comments.</p>

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		<p>and sustainable construction. That is because, the Government’s clear objective in recent years has been to adopt standardised energy efficiency and sustainable construction requirements through the adopted Building Regulations and emerging Future Homes Standards (FHS), so that the requirements are clear to developers and can be implemented in a cost-effective and consistent manner. The Government’s January 2021 response to the FHS consultation sets out that “we must ensure that all parts of industry are ready to meet the Future Homes Standard from 2025, which will be challenging to deliver in practice.” Therefore, a more significant requirement to achieve NCZ immediately upon the plan’s adoption would be even more challenging.</p> <p>Given the difficulty of achieving NCZ in practice, a key element of the Government’s strategy to improve energy efficiency and achieve more sustainable modes of construction is ensuring that the economies of scale are in place to provide the technology required to support the transition to NCZ at a viable price. The requirements of the Building Regulations (and FHS) at any given time are carefully considered, and subject to national viability assessments that consider what measures can be sought without undermining the viability of developments, and therefore deliverability.</p> <p>That is the reason why the Government are pursuing incremental improvements on a national scale and, in turn, why the Government’s own objective is to reach NCZ by 2050. That is underpinned by a “delivery pathway” of meeting interim goals / objectives that recognises the challenges of achieving development with such significant technical standards. If the OWLP were to skip that</p>	

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		<p>process, it would undermine the Government’s long-term intentions, and also potentially introduce a requirement that is not achievable from a technical perspective, or at the very least is not achievable without passing on significant costs to the end-user. Indeed, a Written Ministerial Statement by the Housing Minister confirms that “the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned building regulations.”</p> <p>It is suggested, therefore, that any policies relating to climate change / energy efficiency should require developments to “achieve an energy efficiency in line with the latest standards set by the Government, whether that be Building Regulations or the Future Homes Standard (including any transitional arrangements).”</p>	
<p>Define Planning and Design on behalf of Bloor Homes Limited, 14th May 2024</p>	<p>Policy 6: Flood Risk and Sustainable Water Management</p>	<p>POLICY 6: FLOOD RISK AND SUSTAINABLE WATER MANAGEMENT:</p> <p>BHL supports the Council’s intention to strive for higher water efficiency standards given that the area is classified as one under serious water stress, and note that the development industry already works to high standards in this regard, including the newly introduced Environmental Improvement Plan.</p> <p>In that regard, the requirement for new residential developments to meet the optional water efficiency standard of 110 l/p/d is justified. However, the financial implications of implementing the technology that is required to achieve that standard should be considered in the comprehensive Viability Assessment of the plan’s policy requirements.</p>	<p>Support welcomed.</p> <p>The Council’s Regulation 19 Pre-Submission Draft Plan has been subject to and informed by a Whole Plan Viability Assessment as part of the suite of evidence to support its content.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
<p>Define Planning and Design on behalf of Bloor Homes Limited, 14th May 2024</p>	<p>Policy 8: Renewable and Low Carbon Energy</p>	<p>POLICY 8: RENEWABLE AND LOW CARBON ENERGY:</p> <p>As set out in BHL’s response to Policy 5, any policies relating to climate change / energy efficiency should require developments to “achieve an energy efficiency in line with the latest standards set by the Government, whether that be Building Regulations or the Future Homes Standard (including any transitional arrangements).” That will align with the Government’s intention to create nationalised energy standards that are achievable and viable, and will also ensure that the policy evolves through the plan period.</p>	<p>The primary objective of this Policy is to promote and deliver the integration of non-fossil fuel energy generation into new developments, so that they are producing renewable and low carbon energy on-site rather than fully relying on existing energy providers.</p> <p>The Council’s Regulation 19 Pre-Submission Draft Plan has been subject to and informed by a Whole Plan Viability Assessment as part of the suite of evidence to support its content.</p> <p>No change required.</p>
<p>Stantec on behalf of Bloor Homes Limited and the Pierce Family (Landowners) 15th May 2024</p>	<p>Policy 8: Renewable and Low Carbon Energy</p>	<p>We support the council in its approach to tackling climate change, as set out in proposed Policy 5 (Climate Change) where the requirements appear reasonable and not onerous.</p> <p>In terms of more specific site requirements, we wish to respond to Policy 8. Firstly, we support the requirement set out in Policy 8 which is for “All new homes and new commercial buildings must incorporate renewable and low carbon energy production equipment into its building fabric to meet at least 10% of the predicted total annual energy requirements (of non-renewable and low carbon energy use) of the building and its occupants”. This policy accords with the NPPF chapter 14 paragraphs 159b and 160.</p> <p>Notwithstanding the above, we do note that no viability testing of policies has yet been undertaken. The requirement for all new homes to incorporate low carbon</p>	<p>The primary objective of this Policy is to promote and deliver the integration of non-fossil fuel energy generation into new developments, so that they are producing renewable and low carbon energy on-site rather than fully relying on existing energy providers.</p> <p>The Council’s Regulation 19 Pre-Submission Draft Plan has been subject to and informed by a Whole Plan Viability Assessment as part of the suite of evidence to support its content.</p> <p>No change required.</p>

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		<p>technologies could have significant and, as of yet unknown viability consequences. The policy as it is currently worded is prescriptive in requiring building fabric to meet a '10%' figure.</p> <p>The SA (March 2024) does set out an 'alterative' which is to omit the wording relating to '10% renewable and low carbon energy in all new development' (point 6.62). The SA assessment recognises that requiring all development to contribute towards achieving net zero carbon is "likely to add to the cost of the design and construction of new development" and could have 'minor negative effects on Objective 1 Housing'. We consider that it is challenging, at this stage, to confirm if the prescriptive wording of this policy should be amended in the absence of viability testing. However, given the Governments legally binding national commitment to cut emissions and reach net-zero by 2050 it would seem an important policy and one where prescription is required.</p> <p>Instead, we would suggest that in order to achieve this policy, approaches to other policies (particularly, Policy 12) need to be reconsidered and amended to ensure viability overall. In addition, the council need to identify more sites for allocation as more market housing is a mechanism for delivery on policies such as this one.</p> <p>In the absence of any viability testing and evidence supporting this policy requirement it is not possible at this stage to determine if this requirement for ALL new homes to incorporate low carbon energy infrastructure is justified (NPPF paragraph 35).</p> <p>It is particularly pertinent to note that, from 2025, there is</p>	

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		<p>an objective that all new homes in England will need to be built to the 'Future Homes Standard' (MHCLG The Future Homes Standard: changes to Part L and Part F of the Building Regulations for new dwellings (January 2021)).</p> <p>This requirement is particularly important in the case of this local plan review given that the plan is likely to be adopted Q4 2026 (according to the Local Development Scheme, March 2024) and therefore any sites allocated will be required to meet this standard.</p> <p>We have undertaken a comprehensive review of existing research which advises on average additional build costs associated with low carbon technologies. In a paper published by Savills (The Cost and premium for new eco-homes (June 2023): Savills UK The cost and premium for new eco-homes) they suggest that, in order for developers to deliver homes that meet the Future Homes Standard an additional build cost per dwelling of 4 to 8% should be expected. These are significant additional costs and will surely impact upon achievability of sites currently identified as possible sites for allocation when testing is undertaken.</p> <p>In order to ensure a robust plan is progressed which can find sufficient sites to meet housing need, but also deliver on key requirements such as low carbon technologies, more sites need to be identified as part of this review process. Larger sites are more likely to be viable when required to deliver against targets such as Policy 8 and as such, our site which is 31.4 Hectares in size and could comfortably deliver 500 dwellings (approx.) along with on-site BNG is an ideal opportunity for allocation.</p>	

Chapter 6 – Housing (Policies 9, 10, 11, 12, and 13)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
<p>Define Planning and Design on behalf of Bloor Homes Limited,</p> <p>14th May 2024</p>	<p>Policy 9: Affordable Housing</p>	<p>POLICY 9: AFFORDABLE HOUSING:</p> <p>BHL recognises the importance of delivering affordable housing, particularly given the acute affordability issues in the Borough, and has highlighted in response to Policy 1 that the overall supply of housing in the Borough should be maximised for that reason.</p> <p>BHL welcomes the recognition that the OWLP's affordable housing requirements must be informed by a comprehensive Viability Assessment that considers the cumulative financial implications of all proposed policy requirements.</p> <p>BHL also welcomes the position that the type, tenure and mix of affordable homes will be negotiated at the time of the proposal. The policy recognises that a factor in this is the most up-to-date assessment of affordable housing needs, but the policy should also make reference to evidence of market demand, site and settlement-specific characteristics, and viability.</p>	<p>The Council's Regulation 19 Pre-Submission Draft Plan has been subject to and informed by a Whole Plan Viability Assessment as part of the suite of evidence to support its content.</p> <p>The factors set out have all been considered to inform the Regulation 19 Pre-Submission Draft Plan.</p>
<p>G Longley Planning and Property Services on behalf of Davidsons Developments Ltd</p>	<p>Policy 9: Affordable Housing</p>	<p>The Proposed Policy for Affordable Housing maintains the split target in the currently adopted local plan with a 20% target for Wigston, subject to further ongoing work on minimum targets. A 20% affordable housing target is considered appropriate for Wigston. Any policy also needs to allow for issues of viability to be taken into account where necessary.</p>	<p>The Council's Regulation 19 Pre-Submission Draft Plan has been subject to and informed by a Whole Plan Viability Assessment as part of the suite of evidence to support its content.</p>

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14 th May 2024			
<p>Mulberry Land on behalf of Mrs B Walker (Landowner)</p> <p>15th May 2024</p>	<p>Policy 9: Affordable Housing</p>	<p>Policy 9: Affordable Housing (Strategic) requires appropriate levels of affordable homes to address need and provide a balanced housing market. The allocation of sites should consider amongst other matters the most appropriate way to deliver the affordable needs for the district. The latest HEDA from 2022 provides the Councils standard method housing figure of 188 as a minimum local housing need. In turn the estimated need for affordable rented housing for the district is 139pa (113 excluding existing households). The estimated need for affordable home ownership is 69pa. These are significant figures however the need increases further when considering the impact of addressing Leicester City's unmet needs (private and affordable).</p> <p>Whilst it is unrealistic to provide a mechanism which meets these needs in full, the Council should embrace a district wide target of 30% and as is consistent with other policies considering viability assessments as planning applications are considered. This shouldn't be a minimum target figure, such that landowners and developer need a degree of certainty in appraising investment decisions. Any proposal to artificially set targets based on settlements through this plan (as drafted) should be based on robust viability work. If that settlement based approach is considered appropriate, then the Council should prioritise the allocation of sites which can contribute to securing 30% in settlements such as Oadby.</p> <p>Our application at Oadby Grange seeks to deliver 30% affordable housing on-site, which will accommodate a range of sizes and tenures to suit local need, in response</p>	<p>Support welcomed.</p> <p>The Council's Regulation 19 Pre-Submission Draft Plan has been subject to and informed by a Whole Plan Viability Assessment as part of the suite of evidence to support its content.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>to the Council's HENA. The Draft plan acknowledges that further work is ongoing to establish minimum AH targets to 2041, and of course we would continue to welcome the opportunity to be part of this process. We are supportive of the requirement for 30% at Oadby.</p> <p>Likewise, we welcome the Council's introduction to respond to First Homes, with 25% of all affordable homes on qualifying sites to be First Homes. However, there is no evidence setting out whether the Council intends to seek these as property's to be sold at least 30% below OMV. We expect this to be the case, given government advice, however clarification on this point would be welcomed. There is also no evidence regarding a housing need assessment which presents need for First Homes as an affordable tenure. The HENA (Leicester and Leicestershire Authorities and the Leicester and Leicestershire Enterprise Partnership HEDNA Main Report, January 2017) pre-dates First Homes Guidance released in May 2021.</p>	
<p>Stantec on behalf of Bloor Homes Limited and the Pierce Family (Landowners)</p> <p>15th May 2024</p>	<p>Policy 9: Affordable Housing</p>	<p>The consultation document sets out that the Council will commission an Affordable Housing Viability Assessment that will seek to provide evidence relating to an appropriate affordable housing threshold by which to require affordable housing provision on a development site and an appropriate percentage of affordable housing provision should a development proposal meet the prescribed threshold.</p> <p>However, to support our representation, we have referred to the L&L HENA which provides data relating to Housing Market Dynamics. According to the HENA between 2015 and 2020 house prices in Oadby and Wigston saw strong</p>	<p>The Council's Regulation 19 Pre-Submission Draft Plan has been subject to and informed by a Whole Plan Viability Assessment as part of the suite of evidence to support its content.</p> <p>Therefore, cumulative requirements on and off site have been accounted for and factored in as part of the Whole Plan Viability Assessment report. The Council considers this Policy approach to be appropriate and justified.</p>

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		<p>growth of 6.5% per annum. However, this data is outdated and is unlikely to be reflective of more recent trends, particularly given political agenda changes, the impact of Covid-19 and recession. We have found evidence from the Office of National Statistics database which suggests that within the borough house prices in February 2024 averaged £252,000 which represents a depreciation in value of 8.0% from the previous year (February 2023). Clearly, this recent data provides a very different land value trajectory to what is set out within the HENA (2022). Based on current economic trends, where house prices are trending lower, viability margins for developers will be constrained. This must be accounted for in the approach of the Local Plan policies which relate to delivery requirements for residential developments.</p> <p>With regard to affordable housing, the HENA (2022) establishes a significant need for affordable dwellings within the borough. The 'net need' for affordable homes (inclusive of existing households falling into need) is 139 affordable rent and 69 affordable home ownership dwellings per year, this is over the total annual housing need (tenure blind) of 188 homes. Even when excluding existing households from this projection the need remains at 133 homes per annum which is 60% of the total housing need. Clearly, O&W need to prioritise delivery of affordable homes, and if planning obligations on new market housing schemes is the primary policy tool for affordable delivery, then there needs to be a significant increase in the housing requirement.</p> <p>We would anticipate that most sites would remain viable under a requirement to deliver 20% affordable housing and therefore support the approach to Policy 9. In</p>	

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		<p>addition, given the obvious demand for affordable housing within the borough we support the policy wording that would require 20% as 'a minimum'. This provides flexibility where sites which are able to deliver more can do so and therefore the Local Plan will adhere to and surpass requirements of NPPF paragraph 66.</p> <p>Notwithstanding our support of this policy, we do have concerns regarding the achievability of development delivering on Policy 9 in the context of the wider Local Plan.</p> <p>The combination of reduced house prices impacting viability margins, coupled with development costs incurred by inter alia; statutory BNG requirements (Policy 31), delivery of housing compliant with Part M4(2) (Policy 12) and requirement for renewable and low carbon energy production equipment (Policy 8), means that developers are highly likely to be unable to meet all policy requirements.</p> <p>The result may be developers underdelivering on affordable housing in order to achieve mandatory BNG and Part M4(2) standard homes, balancing incurred costs.</p> <p>This would be contrary to the NPPF Paragraph 34 which states in relation to development contributions that '...such policies should not undermine the deliverability of the plan'.</p> <p>Ensuring delivery of affordable housing as a priority for the borough requires a review of the approach to contributions. BNG requirements cannot be amended as 10% gain is the mandatory minimum, however Policy 12</p>	

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		<p>approach to Part M4(2) of the building regulations needs to be revisited.</p> <p>In addition to viability the impact of BNG, for which there is a preference to deliver on-site means that residential sites will have reduced developable area. This will in turn reduce the number of market housing coming forward on sites and the number of affordable dwellings. In order to ensure the number of affordable homes delivered by the borough over the plan period meets the need, more sites need to be identified for allocation. Our site, which is of significant size (31.4 Hectares and approx. 500 dwellings), appropriately located, has no identified constraints and a potential point of access should be considered as a preferable site for allocation.</p> <p>On the basis of 500 dwellings this site could be expected to deliver a minimum of 100 affordable dwellings which would be a significant portion of the boroughs need for 1 year.</p>	
<p>Stantec on behalf of the Co-operative Group and the University of Leicester</p> <p>14th May 2024</p>	<p>Policy 9: Affordable Housing</p>	<p>Policy 9: Affordable Housing (Strategic)</p> <p>Our Clients are generally supportive of Policy 9, and note the Council's observations that Oadby and Wigston, is made up of three distinct areas all with differing socio-economic characteristics. This being the case, they agree that it is appropriate that the three areas have differing housing requirements.</p> <p>They note that, as currently drafted, Oadby has a requirement for 30%, dropping to 20% for Wigston and 10% for South Wigston, but that all of these figures are currently identified as being "to be confirmed".</p>	<p>Support welcomed.</p> <p>The Council's Regulation 19 Pre-Submission Draft Plan has been subject to and informed by a Whole Plan Viability Assessment as part of the suite of evidence to support its content.</p>

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		<p>At paragraphs 6.2.2 and 6.2.3 of the supporting text to Policy 9, the Council indicates that evidence is currently being prepared in relation to the affordable housing targets. Having not been published as part of this consultation, it is not clear what the basis is for the above targets, but there does at least appear to be recognition that these figures are subject to change, presumably following the completion of this evidence.</p> <p>Similar to comments made above, it is essential that this evidence is published as soon as possible, so that it can be fully considered. This will also enable the Council to finalise its targets and give greater clarity and certainty for all stakeholders, including local residents and the development industry. This is particularly important in the case of Oadby, whereby the higher requirement may have implications on development viability. The publication of this information as soon as possible will foster clarity and confidence to bring sites forward in full knowledge of what the Council is likely to expect.</p> <p>It is also important that any affordable housing requirements are fully tested in terms of viability, and that this is intrinsically linked to the IDP. Additionally, it is noted that the affordable housing needs of the Borough will vary over time, and so we would urge the Council away from implementing prescriptive requirements here, to allow development proposals to respond to specific requirements at the time of submission, over the Plan period.</p> <p>It is welcomed that this policy accounts for circumstances where affordable housing provision may render a</p>	

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		development unviable, and it is important that such provision is retained through the Plan to ensure that sustainable and appropriate developments can be delivered as envisaged and address the pressing need for new homes across the Borough.	
Define Planning and Design on behalf of Bloor Homes Limited, 14 th May 2024	Policy 10: Housing Density	<p>POLICY 10: HOUSING DENSITY:</p> <p>Policy 10 proposes that a density of “at least 40 homes per hectare on average” for sites of over 0.3ha that are located outside of the town centre boundaries of Wigston and the district centre boundaries of Oadby and South Wigston.</p> <p>BHL welcome the recognition in the policy’s supporting text that densities should reflect the context, accessibility, the proposed building types, form and character of the development. BHL would, therefore, welcome the inclusion of that particular reference within the main body of the policy, noting that a net density of 37 – 38 dph may be more appropriate in some locations on the edge of a settlement than 40 dph as suggested.</p>	<p>Policy 10 has been amended to reflect this and wider comments received.</p> <p>The Council recognises the need to see land used efficiently, but also, to deliver a Density Policy that allows flexibility to take account of a wide range of factors including (but not limited to) design-considerations, infrastructure delivery and viability.</p>
Fisher German on behalf of David Wilson Homes East Midlands 14 th May 2024	Policy 10: Housing Density	<p>David Wilson Homes supports the density requirements of at least 40 homes per hectare on average at proposed development sites of 0.3 hectares and larger, located outside of the town centre boundary of Wigston or district centre boundaries of Oadby and South Wigston. This approach is considered to accord with NPPF Chapter 11: Making Effective use of Land.</p> <p>Paragraph 128 states that planning policies should support development that makes efficient use of land, taking into account the need for housing, local market</p>	Support welcomed.

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		<p>conditions and viability, capacity of infrastructure (including proposed and opportunities for further extension), the desirability of maintaining an areas prevailing character and the importance of securing well-designed and beautiful places.</p> <p>It is considered with good design practices; such objectives can be achieved whilst utilising a density of 40dph.</p>	
<p>G Longley Planning and Property Services on behalf of Davidsons Developments Ltd</p> <p>14th May 2024</p>	<p>Policy 10: Housing Density</p>	<p>Objection.</p> <p>The proposed Policy 10 set out in the Preferred Options Consultation presents a changed approach to the Issues and Options consultation with a minimum density of 40 dwellings per hectare required for sites of more than 0.3 hectares outside the town centre boundary of Wigston and the district centre boundaries of Oadby and South Wigston. Previously a minimum density of 30 dwellings per hectare was to be applied outside the Leicester Principal Urban Area boundary.</p> <p>Whilst it is recognised that the NPPF requires the efficient use of land, a minimum density of 40 dwellings per hectare for all new greenfield sites could have implications in terms of design quality and character. It is noted that the National Design Guide does not prescribe a minimum density.</p> <p>For the Strategic Development Area east of Wigston, the Council has approved some 650 dwellings at an average density of 32 dwellings per hectare. This scheme will produce an acceptable and appropriate development in design terms. For the land west of Welford Road, the</p>	<p>Policy 10 has been amended to reflect this and wider comments received.</p> <p>The Council recognises the need to see land used efficiently, but also, to deliver a Density Policy that allows flexibility to take account of a wide range of factors including (but not limited to) design-considerations, infrastructure delivery and viability.</p>

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		<p>proposals set out in the outline planning application provides for a density of 36 dwellings per hectare. The masterplanning work supporting the application demonstrates that this density will provide for an attractive development. The policy should therefore be amended to allow for a minimum density of 30 dwellings per hectare on greenfield sites outside the Leicester PUA.</p> <p>The proposed policy refers to exceptional circumstances where viability evidence demonstrates a higher density cannot be achieved. This is not appropriate. It is not a matter of viability but rather issues of character and design that dictate the final density achieved on a site and this should be the criteria the Council applies in these cases.</p>	
<p>G Longley Planning and Property Services on behalf of Westernrange Limited, Jelson Homes and David Wilson Homes</p> <p>14th May 2024</p>	<p>Policy 10: Housing Density</p>	<p>Objection.</p> <p>The proposed Policy 10 set out in the Preferred Options Consultation presents a changed approach to the Issues and Options consultation with a minimum density of 40 dwellings per hectare required for sites of more than 0.3 hectares outside the town centre boundary of Wigston and the district centre boundaries of Oadby and South Wigston. Previously a minimum density of 30 dwellings per hectare was to be applied outside the Leicester Principal Urban Area boundary.</p> <p>Whilst it is recognised that the NPPF requires the efficient use of land, a minimum density of 40 dwellings per hectare for all new greenfield sites could have implications in terms of design quality and character. It is noted that the National Design Guide does not prescribe a minimum density.</p>	<p>Policy 10 has been amended to reflect this and wider comments received.</p> <p>The Council recognises the need to see land used efficiently, but also, to deliver a Density Policy that allows flexibility to take account of a wide range of factors including (but not limited to) design-considerations, infrastructure delivery and viability.</p>

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		<p>For the Strategic Development Area east of Wigston, the Council has approved some 650 dwellings at an average density of 32 dwellings per hectare. The Vision Document for the land north of Newton Lane looks at a landscape extension to Wigston for at least 900 dwellings at an average density of 37 dwellings per hectare. At this density the scheme will produce an acceptable and appropriate development in design terms. The policy should therefore be amended to allow for a minimum density of 30 dwellings per hectare on greenfield sites outside the Leicester PUA.</p> <p>The proposed policy refers to exceptional circumstances where viability evidence demonstrates a higher density cannot be achieved. This is not appropriate. It is not a matter of viability but rather issues of character and design that dictate the final density achieved on a site and this should be the criteria the Council applies in these cases.</p>	
<p>Mulberry Land on behalf of Mrs B Walker (Landowner)</p> <p>15th May 2024</p>	<p>Policy 10: Housing Density</p>	<p>Policy 10: Housing Density (Strategic) – we are supportive of this policy and would recommend the Council continue to ensure this remains flexible, assessed on a site-by-site basis, depending on location and surroundings. This specifically applies to the requirement of at least 40dph on larger sites outside of Oadby, such as the application site at Oadby Grange. We support the notion that <i>“A balance should be struck which allows for the development needed, while ensuring that design and quality of development maximises opportunities for people to be active.”</i></p> <p>The Council will no doubt be aware that pushing for higher densities of housing at inappropriate locations might not be conducive to delivering well designed, beautiful places</p>	<p>Support welcomed.</p> <p>Policy 10 has been amended to reflect this and wider comments received.</p> <p>The Council recognises the need to see land used efficiently, but also, to deliver a Density Policy that allows flexibility to take account of a wide range of factors including (but not limited to) design-considerations, infrastructure delivery and viability.</p>

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		<p>to live, particularly on the edge of Oadby where access to open space and local service provision is paramount.</p> <p>Based on previous experiences, the 'large sites' being delivered in the Borough, have only been achieving an average of 28dph (Residential Land Availability Assessment 2022/23, Table 8, page 12, accounting for approved development at Wigston Direction for Growth, Newton Lane, Land Opposite Stoughton Farm Park, Land at Cottage Farm, and Land south of St Pettrox Nursery) which is significantly below the now expected 40dph.</p>	
<p>Stantec on behalf of Bloor Homes Limited and the Pierce Family (Landowners)</p> <p>15th May 2024</p>	<p>Policy 10: Housing Density</p>	<p>The proposed policy is the same as the existing policy. Whilst we acknowledge that the council are trying to maximise the amount of housing they can deliver in the urban area, in the context of the recent changes to legislation requiring residential development sites to achieve a Biodiversity Net Gain (BNG) of 10% (Schedule 7A of the Town and Country Planning Act 1990, Environment Act 2021) we respectfully push back on the Councils approach.</p> <p>The current Policy 12 wording is outdated and we urge that revised wording is required to ensure the policy is relevant, appropriate and responds to evidence available. The requirement for 10% BNG to be met on site means that many housing developments will not necessarily be able to deliver at such high densities especially given that BNG is preferably delivered 'on-site' (as in Policy 31 discussed below) and so will take up developable area.</p> <p>The impact of this is two-fold. Firstly, the density policy needs to be written in a way that ensures flexibility to account for spatial constraints resulting from other policy</p>	<p>Policy 10 has been amended to reflect this and wider comments received.</p> <p>The Council recognises the need to see land used efficiently, but also, to deliver a Density Policy that allows flexibility to take account of a wide range of factors including (but not limited to) design-considerations, infrastructure delivery and viability.</p>

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		<p>requirements. It may be that the 50dph and 40dph figures need to be reduced.</p> <p>Secondly, it would seem that through prescribing such high-density requirements of 50dph and 40dph, O&W are able to inflate the number of homes that can be accommodated within the Borough. In assuming that sites can accommodate a minimum of 40 and 50dph, this assists the LPA in demonstrating that the Local Plan can deliver on housing need, particularly a higher percentage of that need within the urban area ('brownfield' land) which would accord with NPPF Paragraph 123 and 124c.</p> <p>However, it is unlikely that such density will be achievable on these urban sites due to on-site BNG requirements. This will result in an overall reduction in the number of homes that these urban/brownfield sites could deliver which, Spatial Strategy policy 1 recognises are already 'a limitation to growth' in terms of number. For this reason, in order to ensure housing need is met, O&W need to identify more achievable, available and deliverable sites.</p> <p>Our site presents an ideal opportunity for allocation and is large enough that, on the basis of 30dph could deliver 500 homes whilst having sufficient land to achieve on-site BNG.</p>	
Stantec on behalf of the Co-operative Group and the University of Leicester	Policy 10: Housing Density	<p>Policy 10: Housing Density (Strategic)</p> <p>Policy 10 sets a minimum requirement of 50 dwellings per hectare on sites within town and district centre boundaries, and at least 40 dwellings per hectare outside of these areas.</p>	<p>Policy 10 has been amended to reflect this and wider comments received.</p> <p>The Council recognises the need to see land used efficiently, but also, to deliver a Density Policy that</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
14th May 2024		<p>Whilst our Clients recognise the challenge that the Council faces in terms of delivering an increasing number of homes, density alone may not be the answer and an increased density whilst ensuring more efficient development, may compromise some of the Council's other objectives, particularly given the extensive requirements stipulated under Policy 1.</p> <p>Additionally, it is not clear how these figures have been arrived at and whether these have been tested, or drawn from comparisons of other existing / permitted development elsewhere in the Borough. The draft Local Plan would benefit from clarity in this respect.</p> <p>In the case of Oadby for example, which is typically characterised by larger dwellings in spacious plots, a minimum development density of 40 dwellings per hectare is at odds with the prevailing character of the area. Whilst it is right to make the most efficient use of land, there is still a need to respect the character of an area, as well as being mindful of the increasing demands placed up on developments, such as through the need to achieve biodiversity net gain and to accommodate measures to address climate change.</p> <p>As such, our Clients would suggest that the Policy approach is amended, either to lower the minimum requirements (particularly for out-of-centre locations) or to state that the figures are a target, as opposed to a minimum. This would allow sufficient flexibility to account for site-specific considerations, whilst also placing an impetus on providing increased density, wherever possible.</p>	allows flexibility to take account of a wide range of factors including (but not limited to) design-considerations, infrastructure delivery and viability.

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
<p>Define Planning and Design on behalf of Bloor Homes Limited,</p> <p>14th May 2024</p>	<p>Policy 12: Housing Choices</p>	<p>POLICY 12: HOUSING CHOICES:</p> <p>BHL considers that it would be more appropriate for this policy to be split by topic, but welcomes the opportunity to provide the following comments.</p> <p>Housing Mix:</p> <p>Whilst it is recognised that the housing need evidence from the LLHENA may be the starting point for discussions in relation to housing mix, the policy should be explicit in stating that regard will also be had to evidence of market demand, site and settlement-specific characteristics, and viability. The proposed housing mix should be tested through a comprehensive whole-plan Viability Assessment.</p> <p>It should also be recognised that the housing mix will inevitably impact on the density of developments, and therefore their overall capacity. Given the limited land that is available and the significant housing requirement, that balance must careful be considered by OWBC.</p> <p>Requirements for Specific Groups:</p> <p>It is recognised that the Government intends to require that all new homes achieve Part M4(2) standard as a minimum. However, this should also be tested through a comprehensive Viability Assessment, and OWBC must provide some flexibility to reflect that Part M4(2) may simply be unfeasible for some plots.</p> <p>It is also recognised that the proposed requirement for 10% of market and 20% of affordable homes to meet Part</p>	<p>The Council's Regulation 19 Pre-Submission Draft Plan has been subject to and informed by a Whole Plan Viability Assessment as part of the suite of evidence to support its content.</p> <p>The Council recognises the need to see land used efficiently, but also, to deliver a Density Policy that allows flexibility to take account of a wide range of factors including (but not limited to) design-considerations, infrastructure delivery and viability.</p> <p>The Council does not have internal resources to administer or deliver a programme to allow residents to convert their homes from M4(2) into M4(3) units.</p> <p>The Council has prepared a Housing Topic Paper, as part of which, the local need to justify the Policy approach towards national space standards is clearly set out and justified.</p> <p>There have not been any site options solely for self and / or custom build received via the three Call for Sites periods to date. Therefore, the Council considers this Policy approach to be appropriate and justified.</p>

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		<p>M4(3) standard is derived from the findings of the LLHENA, based on the Borough's age profile. However, that does not necessarily equate to an actual demand for such units, and Registered Providers of affordable housing do not usually accept an affordable M4(3) home unless an occupant is secured. That could result in significant administrative issues relating to developer contributions.</p> <p>Therefore, a more appropriate approach could be to request financial contributions based on the cost of converting M4(2) units into M4(3) units and apply that to 10% of market and 20% of affordable homes. The Council could then administer the contribution as a grant to residents. Notably, that approach would allow for residents to remain in their homes as their needs change.</p> <p>Internal and External Space Standards:</p> <p>The Government has made clear that the Nationally Described Space Standards (NDSS) are "optional technical standards" that should be implemented only where there is evidence of a local needs, and has also set out in the Planning Practice Guidance that "local planning authorities should consider the impact of using these standards as part of their Local Plan viability assessment."</p> <p>OWBC should, therefore, instruct additional evidence to understand whether there is an actual need and demand for such housing. If there is a need, that should be taken into account in the whole plan Viability Assessment, which should reflect that NDSS-compliant housing is land hungry and will inevitably reduce development capacities.</p> <p>Moreover, any policy requiring NDSS should be</p>	

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		<p>sufficiently flexible to allow for some new dwellings to depart from the NDSS if site specific constraints or viability provide justification.</p> <p>Self and Custom Build Housing:</p> <p>Whilst BHL welcome that there is not an outright requirement for the provision of self- and custom-build housing (SCB) on all residential developments, instead stating that provision will be supported by the Council, BHL nonetheless retain concerns as to the suitability of SCB provision within market residential schemes, as opposed to on specific SCB sites.</p> <p>Firstly, BHL has reservations as to the actual demand for SCB plots; particularly when the only available evidence is a SCB register. SCB registers are not means tested and therefore do not provide an accurate position on the number of people who could feasibly and viably build out an SCB plot. Rather, they often relate to a desire for SCB in specific locations rather than seeking SCB plots on market housing sites.</p> <p>Furthermore, delivering SCB housing within market housing schemes can be practically challenging. For example, the delivery of SCB houses is often dependent on the ability of sites to provide independent construction access and infrastructure, and deal with difficult health and safety issues. SCB housing also has the potential to undermine the realisation of consistent design principles across a scheme, and can also negatively impact on delivery timescales.</p> <p>Therefore, BHL suggest that a small number of specific</p>	

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		sites should be allocated for wholly SCB delivery, reflecting the very limited demand.	
<p>Fisher German on behalf of David Wilson Homes East Midlands</p> <p>14th May 2024</p>	Policy 12: Housing Choices	<p>David Wilson Homes welcome the use of housing mix tables to form the basis of discussions in relation to housing mix deliverable on sites. It is therefore understood that whilst a material consideration in the consideration of a planning application, there remains scope for variation from the mix ascribed in Table 2. This approach is supported, as housing mix will be influenced by a range of factors, including the spatial and geographic context of the site, the housebuilder building the product, the Registered Provider (RP) acquiring and managing the affordable properties, market conditions, local need, design, etc. many of which will change over the course of the Plan period and therefore flexibility and treatment of the housing mix as indicative is supported.</p> <p>The Registered Provider market is becoming increasingly complex in terms of the properties they will manage but also the costs of acquiring property. This is impacting many of the assumptions made in terms of viability and mix. In particular RPs are, in many locations, not wanting to assume management of 1-bedroom flats for example as it is a housing typology that has little demand in respect of occupation, particularly for larger residential schemes incorporating family housing. Such properties are normally more suited for town centre locations and wholly flatted developments where demand is higher and management simpler.</p>	Support welcomed.
Mulberry Land on behalf of Mrs B Walker	Policy 12: Housing Choices	This policy seeks to ensure that new development will provide a wide mix of choice. We support that the Council recognises needs to a range of households. The	Support welcomed.

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<p>(Landowner)</p> <p>15th May 2024</p>		<p>application for land at Oadby Grange seeks to deliver a range of housing that responds directly to the Council's HEDNA, including the required quantum of affordable housing, at 30%. Affordable housing will be provided and designed as 'tenure blind', to include a range of tenures in accordance with Council policy. In addition, up to 65 bedspaces / rooms will be provided for nursing care, under Use Class C2. We strongly welcome the Council's comments at paragraph 6.8.10 of the plan, whereby the Borough has a higher population of over 65 years olds compared to East Midlands and nationally, and we agree that the Council should support delivery of a diversity of new homes at the right places. <i>"In all instances, proposals will generally be supported where they are seeking to meet an identified demand and when proposals are located in the most appropriate available locations."</i> (Paragraph 6.8.17)</p> <p>Through our application, we have demonstrated that delivery of C2 Nursing Bedspaces would present a significant community benefit, and we strongly support the Council's policy on this, recognising the reduction on costs by supporting people to remain as independent for as long as possible, and/or reducing the strain on the NHS by remaining in a care environment as opposed to hospital.</p> <p>The Oadby Grange application includes provision for a nursing home facility at the heart of its layout. The local, regional, and national need for specialist care accommodation is significant, particularly at sustainable locations coming forward as part of a well-balanced, mixed community. Whilst the adopted Local Plan has been successful to date in delivering private and affordable homes, the lack of any specific policies particularly within</p>	<p>The Policy is clear that 'Table 2: Housing mix for affordable housing and market housing' is a starting point for discussions, unless there is any other up to date evidence to consider to inform decision making.</p> <p>Therefore, the Council considers this Policy approach to be appropriate and justified.</p>

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		<p>the Direction of Growth Locations, has done little to address the provision of specialist housing (acknowledging the acute needs).</p> <p>The district has the highest proportion of residents that are over 75 years old, amongst any of the Leicestershire Authorities however the policy vacuum and lack of strategic planning has led to growing issues within the sector such as hospital bed blocking and acute demands for beds. Such trends are demonstrated in the enclosed letter from Mauricare Homes who have an existing facility on London Road. This is a benefit that no other strategic development sites are currently delivering to Oadby and Wigston.</p> <p>It is therefore important for the Council to recognise the intrinsic benefits of submitted proposals which aim to deliver against a range of housing choices, whilst presenting opportunities for care and nursing home provision. This is directly compliant with paragraph 63 of the NPPF, which sets out that the needs for older people (including those who require retirement housing, housing with care and care homes) amongst others, should be assessed and reflected in planning policies.</p> <p>Whilst the Housing Mix at table 2 is the latest Leicestershire Housing and Economic Needs Assessment, it is dated 2022 and acknowledges that up-to-date information may supersede this. It is important therefore to ensure this is considered a starting point and some flexibility will be required responding to the nature of the relaxant sites, their surroundings, and the individual proposals. The HEDA states (HEDA 2022 paragraph</p>	

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		13.53) <i>'The mix identified above could inform strategic policies although a flexible approach should be adopted'.</i>	
<p>Stantec on behalf of Bloor Homes Limited and the Pierce Family (Landowners)</p> <p>15th May 2024</p>	<p>Policy 12: Housing Choices</p>	<p>We support the Council's overall ambition with Policy 12 which seeks to ensure the Council provide a balanced, high quality and fit for purpose housing market which meets the communities needs. This policy would satisfy NPPF paragraph 63 which relates to 'Delivering a sufficient supply of homes' and states that "...within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies".</p> <p>In order to achieve this mix, a sufficient number of sites need to be identified for allocation within the plan. This is because market housing acts as a mechanism for delivery of a mix of homes, including specific needs. As established at section 2.10 below, the Sustainability Appraisal Report (March 2024) published alongside this consultation contains 33 site options, of which 20 are for residential development. Although these sites provide a potential dwelling pool of 5600 homes, which is greater the possible need options (set out at point 2.2.5 above), our concern is that as these sites are yet to undergo viability testing. There is a very real risk that following testing, many of these sites will be discounted. Based on the combination of the unmet housing need for Leicester and the local need, which is 5,040 homes to 2041, the buffer of 540 homes above this could be quickly eroded. Given the unknown outcome of the site testing, the Council need to consider more sites for allocation. Our site needs to be tested as it is of significant size, is achievable with no identified constraints and would be able to provide 500 homes.</p>	<p>The Council's Regulation 19 Pre-Submission Draft Plan has been subject to and informed by a Whole Plan Viability Assessment as part of the suite of evidence to support its content.</p> <p>The Council has prepared a Housing Topic Paper, as part of which, the local need to justify the Policy approach is clearly set out and justified.</p>

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		<p>Notwithstanding our general support for Policy 12 Housing Choices, there is one particular component of this policy that we would respectfully push back against. In September 2020, the Government undertook a consultation on raising accessibility standards of new homes, recognising the importance of suitable homes for older and disabled people. This formed part of a review of Part M of the Building Regulations. The O&W Preferred Options includes Policy 12, 'Housing Choices' which sets out a specific requirement for Part M4(2). Point 6.8.15 of the policy states that 'available national and local evidence suggests that it would be sensible to design housing so that it can be adapted to households changing needs and therefore recommends there is sufficient justification to require that all new build dwellings should be delivered to Part M4(2) 'Accessible and Adaptable' Standards (or equivalent replacement standards). The requirement for all new build dwellings to be designed to achieve M4(2) will also ensure they can be easily adapted to meet the needs of a household including wheelchair users.'</p> <p>We have serious concerns regarding this requirement which is extremely onerous and will have significant viability implications for developers. The NPPF paragraph 35b requires policies to be justified by proportionate evidence. We note that the Preferred Options Local Plan refers to 'Census 2021 data showing that the borough has a 'higher than average' population percentage over the age of 75 at 10.8%. Whilst this may be the case, this is not a significant enough proportion of the population to justify a policy requirement for 100% of new residential dwellings to be built to the M4(2) standards, this is contrary to paragraph 35b of the NPPF. Indeed, within the SA (March</p>	

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		<p>2024) point 6.80 sets out 'reasonable alternatives' that the Council have considered for Policy 12. One of these alternatives includes 'The percentage required for Part M Building Regulations Standard M4(2) could be lower'.</p> <p>Indeed, in a government paper published July 2022 (referenced at point 2.7.3 above) (Consultation Outcome: Raising accessibility standards for new homes: summary of consultation responses and government response (29th July 2022)), this specifically states that 'Categories M4(2) and M4(3) are optional requirements which local authorities can apply through local planning policies where they have identified a local need and where the viability of development is not compromised.' (underlined is our emphasis). We believe that the additional cost incurred would exceed what housing developers would expect to have to factor into development costs. It is highly likely that this requirement, coupled with other policies (BNG and affordable housing) could render many sites undeliverable. The result would be a plan which fails to identify enough deliverable sites to meet housing need and therefore would not be found 'sound' at examination. We wish to push back against this policy as it is currently worded and consider a revision, requiring a smaller percentage of M4(2) compliant homes, underpinned by up-to-date viability testing.</p>	
Stantec on behalf of the Co-operative Group and the University of Leicester	Policy 12: Housing Choices	<p>Policy 12: Housing Choices (Non-Strategic)</p> <p>Policy 12 sets a requirement that all new homes will be built to comply with Part M of the building regulations provision M4(2) (Accessible and Adaptable Dwellings), as well as stating that on all major development proposals, 10% of market homes and 20% of affordable homes will</p>	<p>The Council's Regulation 19 Pre-Submission Draft Plan has been subject to and informed by a Whole Plan Viability Assessment as part of the suite of evidence to support its content.</p> <p>As drafted, the Policy incorporates reference to the Council's 'exceptional circumstances' clause.</p>

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14th May 2024		<p>be delivered compliant to Part M4(3) (Wheelchair User Dwellings).</p> <p>Our Clients have no objection to this in itself but would highlight that such requirements may conflict with other aspirations of the Plan, particularly in respect the requirement for increased density discussed above. As such, it is important that there is a degree of flexibility in the Plan to ensure that any such conflicts can be addressed through appropriate negotiation, and not be subject to lengthy delays.</p>	<p>This allows for flexibility in the Policy and if necessary, gives applicants the opportunity to demonstrate to the Council why their proposed scheme cannot meet the Policy requirements, as set out in the Plan.</p>

Chapter 7 – Commercial Development (Policies 14, 15 and 16)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
<p>Stantec on behalf of the Co-operative Group and the University of Leicester</p> <p>14th May 2024</p>	<p>Policy 15: Retail and Related Policies</p>	<p>Policy 15: Retail and Related Policies (Non-Strategic)</p> <p>Our Clients note the provisions of Policy 15 and are supportive of the need to preserve the vitality and viability of existing town and local centres, consistent with the NPPF. They also recognise the need to require a sequential approach to new retail development. That said, they also consider that the Plan could be more supportive in terms of attracting new retail facilities, particularly where there is evidence to demonstrate a need and a location is suitable without being detrimental to existing facilities. This is particularly pertinent where new communities are being delivered such as in the case of our Clients land interests, as well as other sites that have been presented to the Council, which offer the potential to providing new complementary convenience shopping alongside new homes. Such an approach would also be consistent with other aims and Policies of the draft Local Plan, including Policy 17 (Sustainable Transport and Initiatives), which seeks to achieve a rebalancing of transport in favour of sustainable modes by (amongst others) ensuring that new development is located in sustainable locations with good access to shops, jobs and other key services by walking, wheeling, cycling and public transport.</p> <p>Our Clients consider that their land interest at Gartree Road would represent one such location where a proportionate retail offering would be suitable, and acceptable, both to serve the new community, but also the existing community. This has formed part of their previous submissions and remains part of the proposed option for</p>	<p>Support welcomed.</p> <p>With regards to comments relating to the evidence relating to the inclusion of Impact Thresholds, the Council published its Main TC Uses Study (2024) as part of the Evidence Base alongside the publication of the Regulation 19 Pre-Submission Draft Plan.</p> <p>Therefore, the Council considers this Policy approach to be appropriate and justified.</p>

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		<p>the future development of the Site.</p> <p>Part D) of the policy sets out proposed Impact Thresholds which are below that stipulated in the NPPF. National planning policy clearly allows authorities to set lower thresholds, but it is essential that such thresholds are fully evidenced. In this regard, we note that the Preferred Options Plan is not accompanied by up-to-date evidence to support the stated thresholds, therefore it is not clear whether the approach of the Policy can be considered sound.</p>	

Chapter 8 – Transport and Community Infrastructure (Policies 17, 18, 19, 20, 21 and 22)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
<p>Mulberry Land on behalf of Mrs B Walker (Landowner)</p> <p>15th May 2024</p>	<p>Policy 17: Sustainable Transport and Initiatives</p>	<p>This policy strengthens the requirement for development proposals to be sustainably located, which will enable easy access via non car modes. The Council should, via this policy, be supportive of proposals which demonstrate accessibility to services and facilities, along with more design led solutions at the RM stage of an application to agree parking, cycle storage and EV locations etc.</p>	<p>This level of detail and interpretation of what constitutes a sustainable location and proposals for particular schemes is a level of detail that will be captured and agreed as part of the planning application stage, as opposed via the production of a Local Plan.</p>
<p>Stantec on behalf of the Co-operative Group and the University of Leicester</p> <p>14th May 2024</p>	<p>Policy 17: Sustainable Transport and Initiatives</p>	<p>Policy 17: Sustainable Transport and Initiatives (Strategic)</p> <p>As indicated above, our Clients are generally supportive of the thrust of Policy 17, in seeking to promote sustainable development that reduces the reliance on the private car, and supports modal shift. As the policy suggests, this can be done by ensuring that new development is sustainably located in walking distance of local services. To achieve this however, the Plan should promote new retail uses to provide services to these communities, particularly in the context of significant housing and employment growth, that is envisaged by the Plan.</p> <p>Notwithstanding this, our Clients are concerned with the following statement that is within the Policy, as drafted:</p> <p><i>“The Potential Transport Route will be safeguarded by this Plan unless the positive community impacts of developing the route for alternative uses demonstrably outweighs the benefits of retaining the route for sustainable transport uses. The route will be identified on the Council’s Adopted Policies Map.”</i></p>	<p>General support noted.</p> <p>The designation of the Potential Transport Route (formerly known as Eastern District Distributor Road) has been retained in the Council’s Development Plan for a number of decades. The designation was proposed and continues to be supported by Leicestershire County Council as the Highways Authority, as well as Leicester City Council. Indeed, representations from both Partners were submitted confirming this position as part of the Regulation 18B consultation period.</p> <p>As drafted, the supporting text to the Policy has been expanded to explain the context of the Potential Transport Route in Oadby. However, the Policy text remains unchanged as it is written to explain that the PTR designation will be retained and protected, unless it can be demonstrated that the positive community impacts of developing the route for alternative uses demonstrably outweighs the benefits of retaining the route for sustainable transport uses in the future.</p>

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		<p>Land designated as a “Potential Transport Route” is safeguarded for transport development within the adopted Local Plan, but it is also referred to as the “former Eastern District Distributor Road” (EDDR). Whilst the Policy in the Draft Local Plan states that the route will be identified on the Policies Map, it is assumed that a similar route to that set out in the current adopted Policies Map is envisaged.</p> <p>The current safeguarded route is partially on land controlled by the Co-op and is identified within land identified as a housing allocation within the adopted Local Plan. The current allocation has been in place for a number of years (it is understood that the idea of the road was first mooted in the 1930’s) but the EDDR has never progressed. The route of the EDDR has, in the past, progressed to the north through the administrative area of Leicester City Council (LCC). LCC is also progressing a new Local Plan currently, which, at the time of writing has been submitted for examination. It is notable that Leicester’s adopted Local Plan policies did include a corresponding safeguarded route for the EDDR, but this was not saved beyond January 2009. It is therefore not surprising to find that the policies map proposed as part of the new LCC Local Plan also no longer safeguards land for a “Potential Transport Route” as a continuation of the Oadby and Wigston safeguarded route. This clearly suggests that there is no need for the route and, therefore, there is no need for the Council to continue to safeguard their part of the EDDR. Indeed, continuing to safeguard this land prevents it from contributing to the Council’s housing land supply (noting the constrained nature of the borough and the limited availability of land).</p>	<p>Therefore, the position is to be kept under review as this Plan is taken through to adoption.</p>

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		<p>All of this being the case, our Clients consider that there is no longer a need to safeguard this land for the EDDR and that it would, given its functional relationship to the existing urban area, better serve as housing land to make a meaningful contribution to the Council's housing land supply. They would also question whether the provision of a new link road would adhere to the wider aims of the Plan, particularly with regards to sustainability, the climate emergency and modal shift, which it seeks to foster. The provision of a new link road would, in our Clients view, have the opposite effect and make it easier for people to travel around the Borough via private car (but not in the event that Leicester City Council does not safeguard the remainder of the route to the north which, as discussed above, they are not currently proposing to do).</p> <p>Should the Council choose to pursue the safeguarding of the "Potential Transport Route" it must be robustly evidenced. Evidence must demonstrate: a) why it is required; b) when it will be delivered; and c) how it will be delivered and funded. Without this, there can be no confidence that the Potential Transport Route is justified, and therefore sound.</p>	
<p>Define Planning and Design on behalf of Bloor Homes Limited, 14th May 2024</p>	<p>Policy 19: Improving Health and Wellbeing</p>	<p>POLICY 19: IMPROVING HEALTH AND WELLBEING:</p> <p>BHL recognises the importance of supporting health and wellbeing, and supports the intention of Policy 19.</p> <p>Likewise, it recognises the importance of providing developer contributions to support much needed improvements and new health infrastructure. However, given that NHS Groups undertake an assessment of the health impacts of developments through the planning</p>	<p>The Policy is drafted to ensure that it is established at an early stage how a newly proposed development can contribute to health in the local area. Therefore, the need for a Health Impact Assessment Screening Statement is seen as a proportionate requirement, to ensure that any impacts from a new development can be mitigated. For developments where the initial screening assessment indicates more significant health</p>

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		<p>application process (as part of identifying developer contributions), BHL consider that the requirement for major applications to be accompanied by a Health Impact Assessment screening statement can be removed.</p>	<p>impacts, a more comprehensive, in-depth Health Impact Assessment will be required.</p>
<p>Mulberry Land on behalf of Mrs B Walker (Landowner)</p> <p>15th May 2024</p>	<p>Policy 19: Improving Health and Wellbeing</p>	<p>Although supportive of this policy, there is no wording which sets out existing issues within the Borough in terms of healthcare, and how this could be responded to. The impact of poor health on both the Council and the NHS is significant, and proposals that actively seek to deliver new health care facilities should be fully supported by the Council.</p> <p>The Council's Infrastructure Delivery Plan 2018 sets out that, with a national trend of the population's life expectancy increasing, coupled with the older population increasing, this is placing an increased demand on the public services and resources available for health and social care provision.</p> <p>Indeed, the table shown on page 37 of the IDP identifies that there is a requirement for a new facility to enhance health provision in Oadby. This will be a 'new facility to provide accommodation for a range of users, including GP's, urgent care and diagnostics.' At the time the IDP was prepared, a site was yet to be identified and 6 years on a site remains 'to be identified'. No such site was secured through the previous Local Plan site allocations and in the meantime the healthcare provision in Oadby remains in need of a new facility with a growing and aging population.</p> <p>The application at Oadby Grange has provided a layout which responds to health and wellbeing objectives,</p>	<p>General support welcomed.</p> <p>The Council has ensured that all infrastructure providers have had the opportunity to input into the Infrastructure Delivery Plan that has been prepared as part of the evidence for the Regulation 19 Pre-Submission Draft Plan.</p>

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		<p>primarily through the delivery of a new medical centre and nursing home. In addition, pedestrian linkages throughout the development provide well connected routes with opportunities for improving health and wellbeing. Through the reserved matters stage, the applicant will work further to ensure that way finding, and user-friendly spaces are integral in the design of communal areas, particularly around the nursing home, mindful of future users of these spaces. Trim trails, sensory gardens, raised planting beds, allotments and well sign posted safe routes will be installed.</p>	
<p>Mulberry Land on behalf of Mrs B Walker (Landowner) 15th May 2024</p>	<p>Policy 21: Community Facilities and Indoor Sports Facilities</p>	<p>New community facilities are proposed on-site in the form of a new medical centre, nursing home, community building, community country park and additional benefits such as connectivity to key local services, including sustainable and public transport. The proposed 'community hub' area at the site entrance will provide a sense of place, and will present a welcoming arrival point, fronting onto attractive public realm and overlooking the existing and retained pond.</p> <p>The proposed development will create the opportunity for a new local centre, providing a focus for the new and existing residential properties. The proposed on-site Community Building (Use Class E/F) could accommodate several uses. For example, under the use class proposed, a small shop, café, flexible community space, or dentist could be appropriate in this setting, and would complement the residential areas and health care hub at the local level. This would be in direct response to draft policy 21 given any community uses would be in suitable accessible locations as part of the comprehensive site masterplan.</p>	<p>Noted.</p>

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<p>Mulberry Land on behalf of Mrs B Walker (Landowner)</p> <p>15th May 2024</p>	<p>Policy 22: Open Space, Outdoor Sport and Recreational Facilities</p>	<p>The Play and Open Space Audit 2017 suggests that the Borough has good levels of Informal Open space, Natural Green Space and Parks and Recreation Ground Provision. However, a much-improved Country Park proposal delivered as part of the Oadby Grange planning application has the potential to be the second largest singular area of Natural Green Space, behind Brocks Hill Country Park which is considered a valuable community asset.</p> <p>The policy requires that proposals for new residential development must contribute either physically or financially to the provision or improvement of open space, outdoor sports facilities, and recreation facilities. Currently, there is not a quantitative issue locally in terms of open space, particularly given the existing country park area at Oadby Grange. However, large areas of this facility are inaccessible and poorly managed, and it therefore does not currently constitute 'good quality' open space.</p> <p>The open space currently shown to be provided on the site is primarily to be delivered as natural Country Park, which aims to deliver high levels of biodiversity and ecological enhancement opportunities, through a mix of habitats, safe walking routes, exercise opportunities, play spaces and allotments. There is a fine balance in delivering these aspirations, whilst meeting the needs of policy requirements for the varying open space typologies.</p> <p>In calculating quantity requirements in the various supporting policy documents, the Council wrongly consistently assumes 3 persons per property. We disagree with this assumption, and suggest a figure of 2.6</p>	<p>The Policy has been amended to reflect the latest evidence published to support the Council's Policy position. The Council has published a new Open Space Review (2024), together with a Playing Pitch and Outdoor Sports Space Study (2024).</p> <p>Therefore, the Council considers this Policy approach to be appropriate and justified.</p>

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		is used instead, as set out in the Council’s AMR “ <i>The average household size in the Borough is 2.6 persons per household compared to a Leicestershire average of 2.4 persons per household (Census 2021).</i> ”	
<p>Stantec on behalf of the Co-operative Group and the University of Leicester</p> <p>14th May 2024</p>	<p>Policy 22: Open Space, Outdoor Sport and Recreational Facilities</p>	<p>Policy 22: Open Space, Outdoor Sport and Recreational Facilities (Non-Strategic)</p> <p>Our Clients have no objection to the overall provisions of Policy 22, although they do consider that the Policy would benefit from additional clarification to exclude privately owned sports facilities. The Policy, as written, would include privately owned playing fields and sports facilities as part of the area protected from development. Our Clients consider, however, that privately owned land and facilities provide no guarantee of public benefit and should not, therefore, be precluded from redevelopment should a need arise, particularly in the context of a pressing need for a new housing with a limited availability of suitable sites to address it (noting the aforementioned constrained nature of the Borough, which the Council accepts).</p> <p>Our Clients would stress that they support the protection of publicly owned / publicly accessible sport and recreation facilities, but, as mentioned, they do not consider that this should extend to privately owned land where there is no public right of access.</p>	<p>Noted.</p> <p>The Policy has been amended to reflect the latest evidence published to support the Council’s Policy position. The Council has published a new Open Space Review (2024), together with a Playing Pitch and Outdoor Sports Space Study (2024).</p> <p>National Planning Policy does not differentiate by tenure and therefore, the Council considers this Policy approach to be appropriate and justified.</p>

Chapter 9 – Design and The Built Environment (Policies 23, 24, 25, 26, 27, 28 and 29)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
<p>Stantec on behalf of the Co-operative Group and the University of Leicester</p> <p>14th May 2024</p>	<p>Policy 23: Public Realm</p>	<p>Policy 23: Public Realm (Strategic)</p> <p>Our Clients are supportive of the requirements stipulated within Policy 23 to require development proposals to provide areas of public realm to the highest standard. Our Clients are committed to this as part of any future development on their land interests and recognise the importance of high quality public realm in development proposals, both in terms of design and place-making, but also in terms of its health and well-being merits.</p> <p>Our Clients are also supportive of the flexibility that has been incorporated into this policy in the event that site-specific circumstances warrant a change in approach. Whilst it is right that a deviation from the policy should only be made in exceptional circumstances, it is important that caveats are in place to ensure that, subject to robust justification, otherwise acceptable development is not subject to unnecessary delays as a result of a change in approach.</p>	<p>Support welcomed.</p>
<p>Define Planning and Design on behalf of Bloor Homes Limited,</p> <p>14th May 2024</p>	<p>Policy 25: Landscape and Character</p>	<p>POLICY 25: LANDSCAPE AND CHARACTER:</p> <p>Whilst the proposed wording for Policy 25 broadly reflects the NPPF's tests regarding potential impacts on landscape character and visual amenity, there are subtle differences in the language used that could be open to interpretation. To avoid mis-interpretation or consistencies with the NPPF's tests, this policy should be deleted. That would align with the Government's intention to introduce National Development Management Policies.</p>	<p>The Council is of the view that as drafted, the Policy adds value. Therefore, no change required.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
<p>Mulberry Land on behalf of Mrs B Walker (Landowner)</p> <p>15th May 2024</p>	<p>Policy 25: Landscape and Character</p>	<p>To accommodate growth on sites in the Countryside, this policy will need to be flexible enough so as not to constrain development. It is inevitable that landscape will be impacted when greenfield sites are developed, however the Council will need to weigh up the benefits to approve well considered schemes, which reflect local qualities and character. Sites which do not impact on landscape designations and seek to protect landscape qualities should be viewed favourably by the Council.</p>	<p>Noted.</p>
<p>Stantec on behalf of the Co-operative Group and the University of Leicester</p> <p>14th May 2024</p>	<p>Policy 25: Landscape and Character</p>	<p>Policy 25: Landscape and Character (Non-Strategic)</p> <p>Our Clients welcome the provisions in respect of Policy 25, particularly where the policy states that “<i>The Council will ensure that all development proposals reflect the prevailing quality, character and features such as settlement patterns, important views, open spaces and significant natural habitats.</i>”, noting that this accords with some of their earlier comments in relation to the density of development proposals.</p> <p>Notwithstanding this, they do question whether the above wording would contradict the provisions of Policy 10 (Housing Density) which, as discussed previously, requires comparatively high densities across the Borough, including densities of at least 40 dwellings per hectare in suburban settings. Our Clients have concerns that Policy 10 places a rigid requirement for minimum densities without having regard to the prevailing character of the area, whereas Policy 25 indicates that proposals which do not accord with the prevailing character of the area, in terms of settlement patterns, will be refused.</p> <p>As such, the two policies would appear to be somewhat</p>	<p>Support welcomed.</p> <p>The Council recognises that there a link between Policies 10 and 25, although Policy 10 incorporates text to allow for flexibility where justified.</p> <p>Policy 10 has also been amended to reflect representations received and to allow for consideration of site context, accessibility, the proposed building types, form and character of development proposals.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>contradictory as currently written. That said, our Clients have suggested amendments in relation to Policy 10 to allow for consideration of the character of the area. Our Clients consider that the proposed wording of Policy 25, which allows for an assessment of settlement patterns and character, is a more robust basis upon which to proceed. Clearly, there is a balance to strike between optimising the development potential of a site, whilst also ensuring that the layout and density is appropriate for the area. Policy 25 achieves this, whereas Policy 10, as currently written, is too rigid and provides little flexibility in deviation in terms of densities and settlement patterns.</p>	
<p>Define Planning and Design on behalf of Bloor Homes Limited, 14th May 2024</p>	<p>Policy 26: Culture and Historic Environment Assets</p>	<p>POLICY 26: CULTURE AND HISTORIC ENVIRONMENT ASSETS:</p> <p>Whilst the proposed wording for Policy 25 broadly reflects the NPPF's tests regarding heritage impacts, there are subtle differences in the language used that could be open to interpretation. To avoid mis-interpretation or inconsistencies with the NPPF's tests, this policy should be deleted. That would also align with the Government's intentions to introduce National Development Management Policies.</p>	<p>The Council is of the view that as drafted, the Policy adds value. Therefore, no change required.</p>

Chapter 10 – Natural Environment (Policies 30, 31, 32, 33, 34, 35 and 36)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
<p>Mulberry Land on behalf of Mrs B Walker (Landowner)</p> <p>15th May 2024</p>	<p>Policy 30: Green and Blue Infrastructure</p>	<p>We support policy 30 and the aims it is seeking to achieve. We believe that via the careful masterplanning and landscape strategy for a proposal, loss or harm to the green and blue infrastructure network can be avoided and in fact increased / enhanced. The application at Oadby Grange submitted a Green Infrastructure and Design Statement, which illustrates how green and blue infrastructure has been integrated into the scheme, emphasising our commitment to realising a range of environmental, social, and economic benefits and enhancements. This aligns closely with the Council's Green Infrastructure Plan 2018.</p>	<p>Support welcomed.</p>
<p>Define Planning and Design on behalf of Bloor Homes Limited,</p> <p>14th May 2024</p>	<p>Policy 31: Protecting Biodiversity and Geodiversity</p>	<p>POLICY 31: PROTECTING BIODIVERSITY AND GEODIVERSITY:</p> <p>Whilst the proposed wording for Policy 31 broadly reflects the NPPF's tests regarding impacts on biodiversity / geodiversity, there are subtle differences in the language used that could be open to interpretation. To avoid mis-interpretation or inconsistencies with the NPPF's tests, this policy should be deleted. That would also align with the Government's intentions to introduce National Development Management Policies.</p>	<p>The Council is of the view that as drafted, the Policy adds value. Therefore, no change required.</p>
<p>Stantec on behalf of Bloor Homes Limited and the Pierce Family</p>	<p>Policy 31: Protecting Biodiversity and Geodiversity</p>	<p>We support the Council in their approach to achieving Biodiversity Net Gain, particularly that this is now a mandatory requirement for development both major (as of February 2024) and minor (as of April 2024). All developments will now need to achieve a 10% BNG. The Council currently set out that they will have a preference</p>	<p>Support welcomed.</p> <p>The Council has undertaken a Whole Plan Viability Assessment as part of the suite of evidence to support its Regulation 19 Pre-Submission Draft Plan.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
<p>(Landowners)</p> <p>15th May 2024</p>		<p>towards delivery of BNG on-site. This will have significant implications for developers in terms of viability, with achieving net gain costing more and through loss of developable area where site area is required to accommodate BNG achieving infrastructure. Currently, the sites which have been identified for potential allocation in this new plan have not been tested in terms of viability and this requirement, when combined with others (Policy 8, 10 and 12) could render many sites undeliverable.</p> <p>In addition we note that the Call for Sites submission window closed in October 2021, this was prior to the BNG legislation coming into force. As such, the number of anticipated dwellings on each site considered within Appendix 1 (see point 2.9 of this representation response) of the Preferred Options document and Sustainability Appraisal will be inaccurate. Given the land take required for on-site BNG, the number of homes that could be expected to be delivered will be reduced. As such, the 5,600 home potential capacity across the currently identified sites is likely to be less than this in reality. In order to account for this, the Council need to identify more sites for testing and allocation. Our site which is 31.4 Hectares in size is large enough to accommodate a significant number of homes (approx. 500) whilst leaving a sizeable area available to achieve on-site BNG.</p> <p>Beyond on-site BNG, the Council will accept off-site BNG where sites can demonstrate it is not possible to achieve 10% gain on-site. Whilst we support this approach, it is not yet clear how the Council are going to approach delivery of off-site BNG. For example, will credits from third party providers be the preferred approach or will the Council allocate areas of land within the borough to create a</p>	<p>The approach to BNG in this Policy has been informed by the national policy picture, as well as evidence at both a local and Leicestershire-wide basis.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>Council-led credit scheme. These approaches need to be defined as the new local plan progresses as each will have development implications. In the first instance, third party credit purchase will have viability implications for developers. In the latter instance, the land required to create this Council-led credit scheme will remove potentially developable land from the land pool within the borough reducing potential housing sites. We would like to understand how this is going to be dealt with going forwards and wish to engage with the Council on this matter as more information is provided.</p>	
<p>Mulberry Land on behalf of Mrs B Walker (Landowner)</p> <p>15th May 2024</p>	<p>Policy 32: Local Green Spaces</p>	<p>We Object to policy 32 given the open nature of the policy wording and reference at 10.6.4 to application of Green Belt guidance. A LGS should be afforded protection when it has a public function and accessible open land. Private land which is in agricultural use should not be considered suitable for Local Green Space designation unless the landowner promoted such an initiative with the support of the local community.</p>	<p>The Council is of the view that as drafted, the Policy adds value. National Policy and Guidance is tenure blind and emphasizes importance to local residents, not necessarily land uses.</p> <p>Therefore, no change required.</p>
<p>Define Planning and Design on behalf of Bloor Homes Limited,</p> <p>14th May 2024</p>	<p>Policy 33: Green Wedges</p>	<p>POLICY 33: GREEN WEDGES:</p> <p>BHL's response to Policy 1 highlights the need to release some areas of land from existing Green Wedge designations for development in order to meet the Borough's housing needs and deliver the agreed contribution towards LCC's unmet needs; particularly given the land constraints in the Borough and that a number of the promoted sites / potential directions of growth are subject to suitability or deliverability constraints.</p> <p>Therefore, BHL's response to Policy 1 highlights that the</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council has set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council has published background evidence to underpin its approach</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>focus should be on understanding which areas of land make a less significant contribution to the functionality of Green Wedges and can be developed without significant harm to the extent and function of the retained elements of the Green Wedge. The commentary set out in that response highlights that BHL's sites at 'Land to the South of Sutton Close, Oadby' (site reference OAD/007) and 'Land North of Glen Gorse Golf Course' (reference WIG/010) are appropriate sites for development, and should be released from the Green Wedge.</p> <p>The nature of the two sites and their robust landscape frameworks mean that any potential harm in terms of physical and perceived coalescence will be effectively negated through the careful consideration of the built form and the implementation of a robust landscape strategy; both of which underpin the emerging Masterplans. Moreover, the sites play a very limited role in terms of promoting access to the countryside, and supporting its recreational use.</p> <p>Therefore, it is clear that the sites do not contribute significantly to any of the Green Wedge objectives, and therefore can be removed without undermining its purpose. Therefore, the development of the sites can be accommodated without any harm to the OWGW, and would actually round of the built form and enhance the recreational offer by increasing the quantum of publicly accessible Green Infrastructure. Therefore, in addition to delivering much-needed housing, the development of the sites would realise significant benefits by promoting access to the countryside, enhanced recreation provision and health and wellbeing. Their removal from the OWGW is, therefore, entirely appropriate.</p>	

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
<p>Mulberry Land on behalf of Mrs B Walker (Landowner)</p> <p>15th May 2024</p>	<p>Policy 33: Green Wedges</p>	<p>We support policy 33 and the protection of Green Wedges along with the objectives of such designations. They are an important component of what provides the district with a distinctive identity in transitioning between the city and countryside and maintains the three main settlements. Given there are only two Green Wedges within the district they serve a valuable function in providing a 'green lung' between the urban area and countryside. Whilst it is acknowledged a Green Wedge Review will be undertaken to consider if any land could be released, sequentially this should be considered once the Council has considered all available and suitable alternatives; particularly areas of the Countryside which are not designated as such or fulfil a Landscape designation.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council has set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council has published background evidence to underpin its approach</p>
<p>Stantec on behalf of the Co-operative Group and the University of Leicester</p> <p>14th May 2024</p>	<p>Policy 33: Green Wedges</p>	<p>Policy 33: Green Wedges (Non-Strategic)</p> <p>Our Clients have no objections to the provisions of Policy 33 at present, although it is clear that, as part of the emerging Plan, the Council will need to undertake a review of the Green Wedges having accepted that it must look to greenfield development to meet its development needs. As such, our Clients reserve the right to make further comments to this Policy in the future, upon publication of a Green Wedge review as well as further information on what the Council's growth strategy and proposed site allocations are. As stated above however, this information has not been provided at the time of writing and our Clients would again urge the Council to publish this information as soon as possible, in advance of Spring 2025.</p> <p>We ask the Council has regard to the evidence submitted on behalf of our Clients in July 2023, which demonstrates</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council has set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council has published background evidence to underpin its approach</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		that land south of Gartree Road and east of Stoughton Road, to the north east of Oadby, does not perform a strong Green Wedge function.	
<p>Mulberry Land on behalf of Mrs B Walker (Landowner)</p> <p>15th May 2024</p>	<p>Policy 34: Countryside</p>	<p>It is accepted that the Council cannot accommodate all new housing development within the urban areas, and given the constraints of the Borough, it is accepted that greenfield areas of growth will be needed, particularly when considering the elevated housing figures to assist with Leicester's unmet need. Greenfield land to the east of the settlement of Oadby is recognised in the draft Plan as being a potential area of growth, which we fully support. Land to the east of Oadby at Oadby Grange is located directly adjacent to the existing built-up area and should be considered as a strong option for a future allocation to deliver development at Oadby, whilst maintaining access to the Countryside and stimulating leisure opportunities.</p> <p><i>With reference to the policy text: 'Any development in the countryside should not result in a level of activity that has an adverse impact on the character or biodiversity of the area, unless it is required to ensure the high-quality management and protection of the Countryside.'</i></p> <p>Any development in the countryside is likely to have an adverse impact on the character of the area and we suggest this text is amended to read: <i>'Any development in the countryside should not result in a level of activity that has an unacceptable adverse impact on the character or biodiversity of the area, unless it is required to ensure the high-quality management and protection of the Countryside.'</i></p> <p>The Council has historically shown two areas of Green</p>	<p>General support welcomed.</p> <p>The Council is of the view that as drafted, the Policy adds value. Therefore in this instance, the inclusion of the word 'unacceptable' would be a more permissive approach than the Council is seeking to achieve.</p> <p>Therefore, no change required.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>Wedge, which do not cover site 006 at Oadby Grange. However, there are many submitted sites which fall within areas of Green Wedge. The Council will need to review large areas of green wedge, in particular that between Oadby and Wigston, along with land to the north east of Oadby, should they wish to present allocations in these areas. Policy 33: Green Wedges (non-strategic) makes clear that open land should be protected as green wedge to <i>'influence development while maintaining appropriate distance between settlements'</i>. The importance of green wedge is highlighted in this policy, and we acknowledge that a Review will inform (we expect) allocations for the Reg 19 consultation.</p> <p>We support the notion under Policy 34 that, where development does take place in the countryside, <i>'it must be sympathetically designed and located'</i>. We welcome the strategy being formulated by the Council, in that there is acknowledgement that greenfield development will have to form a part of a sustainable, achievable, and deliverable housing strategy for both the needs of the Borough, combined with the unmet requirements of nearby Leicester City.</p>	

Chapter 11 – Monitoring and Implementation (Policy 37)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received

Appendix 1 – Oadby Site Options (OAD/001 – OAD/015)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
<p>Landmark Planning Ltd on behalf of Oadby Racecourse Holdings Ltd</p> <p>15th May 2024</p>	<p>OAD/005: Land North of Palmerston Way, Oadby</p>	<p>This site has been considered in the past and remains as Site OAD/005.</p> <p>It is part of the Racecourse Holdings property, but is severed from the main body of land by the Leicester Southern By-pass (Palmerston Way). It serves no functional purpose for the racecourse, but is clearly valuable land within the urban form of Greater Leicester and should be put to some useful purpose.</p> <p>It is currently allocated in the current adopted Local Plan, as within the Green Wedge, although noting that the major roads (A6 and Southern By pass, as well as housing built-form) severs the land from the wider Green Wedge. It is an isolated parcel.</p> <p>The company have been approached by a variety of developers and others to make use of this asset in a very sustainable location. These approaches are periodic (including two more within the current Plan consultation) with uses proposed from retail, housing, educational, institutional and recreation.</p> <p>Previously last year the owners were approached by Oadby and Wigston Council to allow an ecological study of the land. This was accepted on the undertaking that the results would be made known to the Racecourse Holdings. While the work was undertaken the results have not been revealed, despite requests. This has hindered the Company from making any positive progress with any proposals as ecological impact of any proposals could be</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>significant on this site.</p> <p>At the same time, it is appreciated that a wide range of other studies are still to be concluded that will very importantly inform the options to be considered for the Plan. In the case of OAD/005 of particular relevance is a Transport Capacity Study, as the site abuts the major roundabout forming the junction of the A6 and Southern by pass.</p> <p>Until these supporting documents are available, it is impossible for Racecourse Holdings to both respond effectively, but also potentially formulate a partnership with proponents of specific proposals. (The Racecourse themselves focus on their core business. They usually do not get involved in promoting non-racecourse specific activities).</p> <p>In this regard I would urge to make the supporting documentation to inform the development of the Plan as soon as possible and anyway significantly before the formal issuing of the Regulation 19 Pre-Submission Consultation in Spring 2025. This is especially the case as the intention from the approved Development Plan Scheme is that the Regulation 22 submission is also programmed for Spring 2025, so allowing no time to modify any proposals at that stage.</p>	
<p>Mulberry Land on behalf of Mrs B Walker (Landowner) 15th May 2024</p>	<p>OAD/006: Land at Oadby Grange, Oadby</p>	<p>Mulberry Land is a privately owned, multi-disciplinary developer within both the commercial and residential sectors. Through our in-house experience, we work closely with planning authorities to deliver proposals that directly address relevant economic, social, and environmental objectives, embracing local and national</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>policies. Together, working in partnership with landowners, planners, public authorities, and local communities, we create places of lasting appeal that maximise the true value of sites and have a positive impact on the surrounding area. Mulberry Property Developments is a privately owned and funded multidisciplinary developer within the commercial and residential sectors.</p> <p>Mulberry Land are the applicant for the current live planning application at Oadby Grange (22/00448/OUT) which seeks to achieve the following:</p> <p><i>“Outline application (all matters reserved) for delivery and expansion of Community Country Park, (including footpaths, car parking, habitat creation, landscaping, play space), Medical Centre (use class E), Care Home Facility (use class C2) providing up to 65 bed spaces, Community Hub Building (use class E/F), and up to 147no. residential dwellings (use class C3) with associated access, drainage, car parking, internal roads, landscaping, infrastructure and associated works.”</i></p> <p>Land at Oadby Grange is referred to as OAD/006 in the draft plan, Appendix 1, and identified for <i>“Residential and Country Park: approximately 300-350 dwellings”</i>.</p> <p>The Council acknowledge that they have <i>‘not fully developed the suite of evidence that would underpin the new Local Plan and its growth areas’</i>. However, through the submission of our planning application (ref: 22/00448/OUT) we have submitted a vast range of evidence in support of growth at Oadby Grange, to the east of Oadby. The application is currently the subject of a consultation owing to the amended description of</p>	<p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>development however there were no technical objections from statutory consultees as summarised below:</p> <p>Highways: No objection subject to conditions. Impacts on highway safety would not be unacceptable and when considered cumulatively, the impacts on the road network would not be severe.</p> <p>Commissioning & Quality Adults & Communities Dept: Responded with general information about their aspirations to inform the Council's thinking, regarding need and demand on services.</p> <p>Ecology: General comments received; latest submission responds to these. Positive BNG position on-site.</p> <p>Environment Agency: No objections.</p> <p>Leicestershire County Council Planning Obligations: Contributions sought and listed.</p> <p>LLFA: Conditions recommended, no objection.</p> <p>Planning Policy & Regeneration: Relevant policies referred to, for the applicant to demonstrate compliance with policy.</p> <p>Leicestershire Police: No objection.</p> <p>The application has therefore demonstrated the delivery of growth and amenities without any technical impediments. The application therefore confirms that this area of growth is appropriate and can indeed therefore be allocated for development without constraints nor delays in delivery.</p>	

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>The application also confirms that a growth area to the east of Oadby can and will take account of all infrastructure requirements, including highways and public transport, GP practices, education, BNG, housing type side and tenure, open spaces, community facilities and sports. The package of community benefits, including the provision of additional affordable housing is substantial and responds directly to policy requirements. Letters of support for the proposals are appended to this submission.</p> <p>These were received from Mauricare Homes, the Commissioning and Quality, Adults and Communities Department, Leicestershire County Council, and the Doctors at Severn Surgery.</p>	
<p>Define Planning and Design on behalf of Bloor Homes Limited, 14th May 2024</p>	<p>OAD/007: Land South of Sutton Close, Oadby</p>	<p>Define Planning and Design write on behalf of Bloor Homes Limited (BHL) in response to the Oadby and Wigston Local Plan Preferred Options consultation to make 2no. submissions in relation to BHL's land interests at 'Land North of Glen Gorse Golf Course' (Site Ref. WIG/010) and 'Land South of Sutton Close, Oadby' (Site Ref. OAD/007). Though the sites are able to be delivered separately, they are related given their proximity to each other, and have the potential to form Phases 3 and 4 of the committed Cottage Farm, Oadby development.</p> <p>Each submission contains formal representations within the required response form, a 'USP document' that demonstrates the opportunity for the delivery of sensitively designed development within each site and the benefits that would be realised as a result, and an Access Feasibility Study (which is identical within each submission) that demonstrates that the development of</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		both sites can be accommodated within the existing A6 / Jamie Marcus Way signal junction that has been delivered to facilitate the committed Cottage Farm development.	
Define Planning and Design on behalf of Bloor Homes Limited, 14 th May 2024	OAD/007: Land South of Sutton Close, Oadby	<p>DEVELOPMENT AT LAND SOUTH OF SUTTON CLOSE, OADBY (SITE REF. OAD/007):</p> <p>Site Suitability:</p> <p>BHL has land interests to the south of Sutton Close, Oadby (site reference OAD/007 in the LPPO). The site is delineated by residential development and educational uses (Brocks Hill Primary School, Gartree High School and The Beauchamp College) to the north, and Coombe Park to the east. Land to the south relates to a committed residential development that is currently being developed by BHL, with outline approval having been granted in 2021. Land to the west of the site is agricultural in nature and forms the open countryside, but notably the proposed developable area would not extend further west than the adjacent residential development to the north (discussed in further detail below).</p> <p>The site is well-related to the existing southern edge of Oadby's urban form. It therefore benefits from direct access to nearby services and facilities, including the adjacent primary school, high school and college, and the Glen Road Local Centre, which offers a large convenience store, petrol station, and medical centre. It is also well connected to Oadby Town Centre to the north, which has a range of local convenience stores and local shops, two post offices, a library, a doctors surgery, a dentist, and places of worship. Oadby also has a wide-ranging recreational offer, including a leisure centre incorporating</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach</p>

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		<p>playing pitches, a number of gyms, sports pitches, play areas, the nearby Coombe Park, a golf course, and a visitor centre.</p> <p>Residents of Oadby can also access Leicester via bus, and therefore are able to benefit from the full range of services and facilities on offer therein. The 31 service that serves Brocks Hill School, Gartree High School, and Beauchamp College provide half-hourly services to the city centre, as do the 31, X3, and X31 services that run along the A6 to the east of the site.</p> <p>The site itself is not subject to any insurmountable constraints, and is therefore suitable for residential development. The following points are noted:</p> <ul style="list-style-type: none"> • An Access Feasibility Report has been prepared that considers this site alongside the land that is being promoted by BHL to the immediate south (Ref. WIG/010). The report highlights that the development of both sites can be accommodated within the existing A6 / Jamie Marcus Way signal junction that has been delivered to facilitate the BHL development to the east (Cottage Farm Phases 1 and 2). • There is opportunity to access nearby facilities and services through the provision of access to the north of the site (notably providing direct connections to educational uses) and through the committed Cottage Farm development to the south-east. • The site is located in Flood Zone 1. The vast majority of the site is at very low risk of surface water flooding, and any areas at a higher level of risk are confined to the margins of the site and / or can be accommodated within open space corridors through the site. 	

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		<ul style="list-style-type: none"> • The site is not subject to any statutory or non-statutory ecological designations, and there are no immediately obvious ecologically sensitive features within the site. Brocks Hill Country Park is located to the north-west of the site, and an appropriate offset will be provided through the delivery of a potential expansion to the Country Park at the site's west. • The site has only one internal tree (which the Masterplan retains) and none of the trees at the site's boundaries are subject to Tree Preservation Orders (TPO). Tree and hedgerow loss at the site's boundaries will be very limited, relating only to those areas that are required to facilitate access, and will be more than offset through the proposed tree planting in green corridors and open spaces. • There are no statutory or non-statutory heritage assets within proximity to the site, and it is not located in a conservation area. 	
<p>Define Planning and Design on behalf of Bloor Homes Limited,</p> <p>14th May 2024</p>	<p>OAD/007: Land South of Sutton Close, Oadby</p>	<p>Green Wedge:</p> <p>It is recognised that the site forms part of the Green Wedge between Oadby and Wigston, as defined by OWBC's adopted Local Plan (aLP).</p> <p>The aLP states that that the purpose of Green Wedges is to "protect important areas of open land which influence development form and have a positive effect on people's health and well being." On that basis, Policy 42 of the aLP identifies the following four objectives of 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; and 	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<ul style="list-style-type: none"> • Act as a recreational resource. <p>However, through the aLP's examination OWBC made clear (see paragraph 3.2, 'Further Green Wedge Note') that the countryside designation is "considered by the Council to be of a much higher value than the green wedge designation in the context of its release for strategic urban built development", and that "the countryside designation is more restrictive than the green wedge designation, as the purpose of the green wedge is not to restrict the growth of the urban area, but to ensure that, as the urban area extends, open land is incorporated." There is, therefore, a recognition that Green Wedges should be continually reviewed as part of the preparation of a plan's spatial strategy, and that the housing need of the Borough is a key factor within that.</p> <p>OWBC undertook a Green Wedge Review (GWR) in 2017 as part of the aLP's preparation. That concluded that the Oadby and Wigston Green Wedge (OWGW) should be extended to cover the full extents of the Lucas Marsh Local Nature Reserve, and to cover land to the south-west of the Cottage Farm Phase 2 development; including site ref. WIG/010. BHL objected to the proposed extension of the OWGW at that point, and maintains its view that the two sites being promoted are not integral to its function, and that they can be sensitively developed without undermining the retained Green Wedge. The Vision Document that has been submitted alongside these representations highlights how development can be facilitated within the site whilst still contributing to the purposes and objectives of the residual Green Wedge in this locality. The findings of the Vision Document are summarised below.</p>	

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		<p>The GWR Joint Methodology states that designated Green Wedge areas should contribute, or be able to contribute, to all four of the stated objectives, and they are each considered in the submitted document.</p>	
<p>Define Planning and Design on behalf of Bloor Homes Limited, 14th May 2024</p>	<p>OAD/007: Land South of Sutton Close, Oadby</p>	<p>Green Wedge Functions 1 and 2:</p> <p>Green Wedge Functions 1 (preventing the merging of settlements) and 2 (guiding development form) are inter-related.</p> <p>In relation to Function 2, it is important to first consider the current context in terms of the requirement for OWBC to identify a sufficient quantum of housing to meet its own housing needs in full, and deliver the agreed contribution towards LCC's unmet needs. Given the land constraints in the Borough, and that a number of the promoted sites / potential directions of growth are subject to suitability or deliverability constraints as set out above, there are very limited opportunities to meet that need without resulting in the loss of some Green Wedge. Therefore, a change to the currently designated area is required, and the focus should therefore be on understanding which areas of land make a less significant contribution to the functionality of the OWGW and can be developed without significant harm to the extent and function of the retained elements of the Green Wedge.</p> <p>Both sites fall into that category, and can therefore be removed from the OWGW for sensitive residential development; be that individually or collectively. The overarching Leicestershire wide GWR Methodology states that Purpose 1 is underpinned by an intention to safeguard</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>“the identity of communities within and around urban areas that face growth pressures”, and highlights that this point should be considered in terms of both physical separation and the perception of distance between two settlements.</p> <p>At the closest pinch point between the dwellings fronting Wigston Road and the rear gardens of dwellings at Hidcote Road (i.e. the land containing Oadby Town Football Club and Parklands Leisure Centre), the gap is just 307m. Moving south from that, the current gap widens to 528m, and then narrows again to 477m at the south-western corner of Tilton Drive (near to the northern site’s north-west corner). Critically, the Masterplans for the development of the sites have evolved to ensure that built development would not extend further west than the current eastern edge of Oadby. Therefore, the gap between Wigston and the built form in the northern site (OAD/007) would not fall below 477m as is currently the case, and the gap between Wigston and the built form in the southern site (WIG/010) would be 845m. Therefore, the development of the sites would not result in coalescence between the settlements from a physical perspective.</p> <p>The fact that built development will not be seen as extending any further west than the current extents of Oadby will also mean that there will be very limited visual perception of coalescence. Rather, for the northern site, the new residential development will be screened by the built form in views from the north, and seen in the context of the school buildings and existing residential development in views from the west, south and east. Likewise, for the southern site, new development will be seen as a natural extension to Phase 2 of the Cottage</p>	

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		<p>Farm development. Moreover, both sites will be well contained by the existing landscape framework, which will be enhanced through the structural tree and vegetation planting that is proposed in the emerging Masterplans.</p> <p>Therefore, the development of the sites will not result in physical or visual coalescence between Oadby and Wigston. Rather, the development of the sites will form natural extensions to the settlement to round off the built form, and will actually form a clear and well-structured edge to the retained Green Wedge, as set out in the Vision Document.</p>	
<p>Define Planning and Design on behalf of Bloor Homes Limited, 14th May 2024</p>	<p>OAD/007: Land South of Sutton Close, Oadby</p>	<p>Green Wedge Functions 3 and 4:</p> <p>With regard to the scale of the development, and therefore the extent to which the development of the sites will impact on functions 3 and 4 (which are also inter-related), it is noted that sites OAD/007 and WIG010 total 21.91ha, and therefore comprise 13% of the total area of the Oadby and Wigston Green Wedge. However, the emerging Masterplans demonstrate that just 9.83ha of residential development will be delivered across the two sites, with the remaining 12.07 hectares being retained as Green and Blue Infrastructure. The level of green infrastructure within the Green Wedge will, therefore, only reduce by 5.85%.</p> <p>Moreover, both sites are currently under private ownership, with public access limited only to the public right of way that runs around the edge of the southernmost site (ref. WIG/010). Presently, therefore, the sites make a very minor contribution towards functions 3 and 4. Moreover, the development of the sites will actually enhance their recreational role. The existing public</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>footpath will be retained and, rather than leading through private land, will now connect to publicly accessible and high-quality green infrastructure that will be available for the enjoyment of new and existing residents, connecting with new footpaths in both developments. The development of the sites will, therefore, enhance the experience of users of the public footpath who are seeking to access the wider countryside.</p> <p>The generous areas of green infrastructure that will be delivered through the development of the sites will also significantly increase the quantum and quality of publicly accessible, usable recreational space. As above, both Masterplans deliver multi-functional and high-quality green infrastructure, which will incorporate public open space, new tree planting, direct and convenient footpath links, and drainage features. Specifically, the delivery of the sites will provide an expansion to Brocks Hill Country Park at the north-west of the northern site, additional playing pitches at the east of the northern site, and orchards at the south-western extents of the southern site. Therefore, that will realise significant recreational benefits to new and existing residents.</p>	
<p>Define Planning and Design on behalf of Bloor Homes Limited, 14th May 2024</p>	<p>OAD/007: Land South of Sutton Close, Oadby</p>	<p>Conclusion:</p> <p>Given the scale of the housing requirement and limited land in the Borough, the release of some areas of the Green Wedge for development is necessary. The nature of the two sites and their robust landscape frameworks mean that any potential harm in terms of physical and perceived coalescence will be effectively negated through the careful consideration of the built form and the implementation of a robust landscape strategy; both of</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish</p>

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		<p>which underpin the emerging Masterplans. Moreover, the sites play a very limited role in terms of promoting access to the countryside, and supporting its recreational use.</p> <p>Therefore, it is clear that the sites do not contribute significantly to any of the Green Wedge objectives, and can be removed without undermining its purpose; which is in contrast to some promoted sites that form an integral part of the Green Wedge.</p> <p>Therefore, the development of the sites being promoted by BHL can be accommodated without any harm to the OWGW, and would actually round of the built form and enhance the recreational offer by increasing the quantum of publicly accessible Green Infrastructure. Therefore, in addition to delivering much-needed housing, the development of the sites would realise significant benefits by promoting access to the countryside, enhanced recreation provision and health and wellbeing. Their removal from the OWGW is entirely appropriate.</p>	background evidence to underpin its approach.
<p>Define Planning and Design on behalf of Bloor Homes Limited, 14th May 2024</p>	<p>OAD/007: Land South of Sutton Close, Oadby</p>	<p>Development Potential of Land South of Sutton Close, Oadby (OAD/007):</p> <p>The emerging Masterplan for the site’s development, as presented in the Vision Document that has been submitted alongside these representations, has been prepared on the basis of a detailed understanding of the site and its context, and will deliver a landscape-led scheme that responds to the site’s surroundings, maintaining the functionality of the Green Wedge, and rounding off the built form. Through the Masterplanning process, consideration has also been given to how the site and the adjacent land to the south (ref. WIG/010) can be delivered</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach</p>

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		<p>comprehensively to facilitate a high-quality new development; though the sites are also able to be delivered individually.</p> <p>The Masterplan for this site proposes vehicular access through the 'Cottage Farm Phase 2' development to the south-east, with development comprising simple perimeter blocks that will be served off the spine road. That will ensure that rear gardens are secured and that an active frontage is provided to the primary route and open spaces. Access to the north will be considered further to provide direct and convenient links to the adjacent schools and the wider built form.</p> <p>The Masterplan incorporates a healthy quantum of open space / green infrastructure. Taking account of the Green Wedge designation, land at the site's western edge will be kept free of built development to allow for a potential expansion to Brocks Hill Country Park. That would connect with the linear green corridor at the southern boundary of the site, which will incorporate new tree planting, footpaths, and drainage features. At the site's east, there is potentially an opportunity to extend the playing pitches, which would provide for an appropriate transition between Coombe Park, the existing schools and the new and existing residential development.</p> <p>The Masterplan clearly demonstrates the suitability of the site, and its capacity to deliver c. 140 – 160 new homes in a well-contained and sensitive extension to the built form. Notably, the site is able to deliver in the first five years of the plan period in order to support a five year supply of housing; with BHL having a strong and reliable track-record of housing deliveries both in the Borough and the</p>	

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		wider Leicestershire area.	
Define Planning and Design on behalf of Bloor Homes Limited, 14 th May 2024	OAD/007: Land South of Sutton Close, Oadby	<p>Conclusion:</p> <p>Given the clear need to maximise the delivery of suitable, available and deliverable sites to meet the OWLP's housing requirement, and that there is limited available land in the Borough, site OAD/007 must be removed from the Green Wedge and allocated for the residential development of c. 140 - 160 new dwellings within the OWLP. BHL would welcome the opportunity to discuss the site and its potential for development with OWBC ahead of the next round of consultation.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach</p>
DLP Planning Ltd on behalf of Bowbridge Land Limited, 14 th May 2024	OAD/007: Land South of Sutton Close, Oadby	<p>Site Promotion – OAD007 – Land south of Sutton Close, on behalf of Bowbridge Land Limited</p> <p>Our client fully endorses the site's continued assessment as part of the Local Plan process. Our client further welcomes the support provided by the Local Planning Authority to recognise the site's suitability for potential allocation of the parcel of land for residential purposes as part of the options currently subject to consultation.</p> <p>The site can deliver circa 150 dwellinghouses, together with any ancillary open spaces and all sustainable drainage measures required.</p> <p>The site can be either accessed from Sutton Close to the North, or via Cottage Farm land to the South via the existing land benefiting from outline planning permission. Equally, it is entirely possible to access the land via both means of access via a range of footways, cycleways and adoptable roads.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach</p>

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		<p>The site has been identified by the Local Planning authority as being capable of being delivered and developed for a compatible land use with the surrounding urban form. The site is exceptionally well located to complement and enhance the relationship between the urban extension currently being delivered at Cottage Farm and existing development at Oadby. When compared with other site options the standalone assessment of the site within the Council's Initial Site Assessment and Regulation 18b Sustainability Appraisal findings for site options (see Table 5.1) scores potentially significant positive effects for indicators including Housing (SA1), Health and Wellbeing (SA2), Community and Leisure Facilities (SA3) and Education and Training (SA16). This scoring generally reflects the site's proximity to the existing urban area and suitability for development.</p> <p>The need to deliver additional housing to serve both the existing and neighbouring communities is recognised by the LPA.</p> <p>Opportunities are limited within the urban area to accommodate all of the identified housing numbers over the plan period. This is recognised by the LPA and consequently sustainable edge of urban areas will need to be released to meet the recognised emerging housing needs. The characteristics of the site, as summarised in these representations, within the wider context of housing need and options available to the Council indicate that its allocation should be supported. These representations further illustrate that our client's interests comprise an opportunity for delivery in the early part of the plan period to continue the existing direction of growth at Cottage Farm.</p>	

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		<p>Any concerns over encroachment into the currently identified Green Wedge will need to be carefully balanced against a wide range of material planning considerations, although given the enclosed and sustainable location associated with the emerging allocation, it is challenging to establish the precise level of demonstrable harm which could result through the development of site, particularly in the context of an emerging strategic housing allocation immediately to the south.</p> <p>This representation made on behalf of Bowbridge Land should be read in conjunction with those submitted on behalf of Bloor Homes Limited. Bowbridge Land confirms that together with the standalone comments on Site OAD/007 contained in these representations as promoter of the site it endorses the submissions prepared in partnership with Bloor Homes Limited. Bowbridge land further confirms the availability of the site to be considered as part of comprehensive extensions to the Cottage Farm scheme together with site reference WIG/010 to the west of the existing allocation. Bloor Homes Limited have vested interest in Cottage Hall farm to the south and benefit from extant permission for this strategically allocated site (see representation by Define Planning and Design Limited).</p> <p>Bowbridge Land would fully endorse the comments and support for further land at WIG/010 to be promoted and considered for allocation to the south and west of their land interests. There is a significant degree of collaboration between the parties, seeking to further ensure both land is available to meet housing needs in an entirely suitable location. Equally through collaboration, it</p>	

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		<p>is possible to ensure access options can be provided and a national delivery vehicle is available to construct at some point over the emerging plan period.</p> <p>Site options OAD/007 and WIG/010 are both free of any significant incumbents and is not subject to any previous development constraints in the form of heritage features, protected views or vistas or restrictive physical constraints, hence making the land unviable or undeliverable.</p> <p>The orientation of the land will avoid any adverse impact upon neighbouring properties and development will comfortably blend into a rapidly changing urban landscape.</p> <p>It is there anticipated that the LPA will continue to support and promote the allocation of this parcel of land and seek to allocated it through the development plan process.</p> <p>I trust this short note and supporting report supplied will continue to be treated as support for the draft allocation.</p> <p>The comments made should be read in conjunction with those supplied by Bloor Homes Limited on addressing our client's site OAD/007 and also site WIG/010 located to the south and west of our client's land within the overarching context of the existing Cottage Farm allocation.</p>	
DLP Planning Ltd on behalf of Bowbridge Land Limited,	OAD/007: Land South of Sutton Close, Oadby	The comments made should be read in conjunction with those supplied by Define Planning and Design Limited on behalf of Bloor Homes Limited on land to the south addressing our client's site OAD/007 and also site WIG/010 located to the south and west of our client's land	The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option,

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14 th May 2024		<p>within the overarching context of the existing Cottage Farm allocation.</p> <p>There is no need to repeat the detailed representation supplied by Bloor Homes Limited, other than to support its content and endorse the content supplied.</p> <p>Particular attention is drawn to those parts of the representations on behalf of Bloor Homes Limited that address:</p> <ul style="list-style-type: none"> • the suitable and sustainable relationship of both sites OAD/007 and WIG/010 with limited upon the existing Green Wedge designation. • Access feasibility (in addition to the potential access to our client's land from Sutton Close). • Local Housing Need and the proposed housing requirement, including ensuring minimum agreed contributions towards Leicester's unmet needs are achieved together with flexibility in the supply pipeline and a buffer to overall provision in the Plan Period; and • The suitability of sites OAD/007 and WIG/010 when considered alongside other site options. 	<p>including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach</p>
<p>DLP Planning Ltd on behalf of Bowbridge Land Limited,</p> <p>14th May 2024</p>	<p>OAD/007: Land South of Sutton Close, Oadby</p>	<p>We wish to promote the allocation of the land outlined in red on the enclosed site location plan as an additional housing allocation within the emerging Oadby & Wigston Local Plan.</p> <p>It is noted that our client has shared interest in promoting the land with Bloor Homes Limited.</p> <p>Separate representations on behalf of Bloor Homes have been made under separate cover (See response by Bloor</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach</p>

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		<p>Homes Limited provided by Define Planning and Design Limited) and there are distinct collaborative views from both parties which fully support the site and justify its inclusion within the emerging Development Plan.</p>	
<p>DLP Planning Ltd on behalf of Bowbridge Land Limited, 14th May 2024</p>	<p>OAD/007: Land South of Sutton Close, Oadby</p>	<p>Site and Context</p> <p>The site (defined as OAD/007) falls within the jurisdiction of the Borough of Oadby and Wigston Local Planning Authority.</p> <p>The Site is located south of Sutton Close in Oadby, adjacent to existing residential development in the north, and north of the Cottage Farm Direction of Growth Area (as allocated in Policy 21 of the current adopted Local Plan (2019)). The enclosed positioning of the site between established residential areas immediately to the north and land allocated for further development to the south ensures the site is well enclosed, contained and integrates the overall parcel of land into the urban landscape.</p> <p>The site is within proximity to existing social infrastructure, including a range of schools and colleges, high quality public parks and associated formal sports fields, The parcel of land offers convenient access to the Glen Road Local Centre which in turn offers a large convenience store, petrol station, and medical centre. Oadby Town Centre lies to the north, which has a wider range of local convenience stores and shops, two post offices, a library, a doctors surgery, a dentist, and places of worship. The Site is approximately a 20-minute drive to Leicester City Centre. Bus services (number 31 bus) connects the site to employment areas, cultural, and recreational opportunities.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach</p>

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		<p>This location offers an opportunity to facilitate the organic expansion of the established and sustainable community within the existing urban area and current development at Cottage Farm. The potential development of site OAD/007 would optimise land use, leveraging existing infrastructure while accommodating future growth; promoting sensitive urban development without compromising the locally identified Green Wedge.</p> <p>The Site is a greenfield parcel of land and lies within the currently identified Green Wedge area between the settlement areas of Oadby and Wigston, with existing development and planned development enclosing the land. The proximity of the site to high quality and very well used public parks, such as Coombe Park, and existing Public Rights of Way (PRoW) which led through public greenspace is a significant advantage for residential development, offer opportunities for immediate access to both formal and informal recreation space.</p> <p>The site benefits from the absence of any major physical, cultural, heritage or environmental constraints, but the following points are noted:</p> <ul style="list-style-type: none"> • An Access Feasibility Report confirms the site's viability for development alongside neighbouring land, facilitated by existing infrastructure. • Pedestrian and cycle links to nearby amenities, notably educational facilities, enhance accessibility. • Positioned in Flood Zone 1, the site faces minimal risk of surface water flooding, with manageable risks at its southern periphery capable of being accommodated within the site's underlying topography 	

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		<ul style="list-style-type: none"> • Absence of ecological designations or sensitive features within the site, with plans for offsetting any impact on nearby Brocks Hill Country Park. • Minimal tree loss with retention of internal trees and limited removal at boundaries, offset by proposed tree planting. • No heritage assets or conservation areas in proximity to the site, ensuring no heritage related constraints. <p>It can therefore be considered that the Site's strategic positioning alongside its minimal constraints make the parcel of land a viable option for Site allocation in the emerging Development Plan.</p> <p>Vehicular access to the land can be provided from either Sutton Close (the landowner has an option to purchase dwellinghouse on Sutton Close which offers an access point from the north). Access is also available from the south and the current Housing allocation and potential logical future expansion of this parcel of land for housing purposes, which is further reinforced within the separate submissions from Define on behalf of Bloor Homes Limited.</p> <p>Over the coming years, the Borough of Oadby and Wigston will need to undergo change and transformation, to provide for its local community. The new Local Plan will take account of Leicester City Council's declared unmet housing needs.</p> <p>Taking account of the Regulation 18B Site Options available to the Council, there is potential capacity for up to 6,000 new homes.</p>	

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		<p>Land to the north of the Cottage Farm Direction of Growth Area is promoted for residential development as part of the previous Local Plan process, allocated under Policy 21. The allocation supports the role of Oadby District centre as the Borough's second largest centre which is a key aspiration of the Council and a spatial objective within this Plan.</p> <p>To confirm, land to the southeast of the site has planning permission for 150 dwellings and is currently being built-out. This site is known as Land at Cottage Farm (Phase 1) and in addition to 150 new residential dwellings, it has also delivered a new signalised site access junction on to the A6 Glen Road to the east. Planning permission for Phase 2 of this site was approved in June 2021 (ref. 19/00356/OUT). This application proposes the second phase of development on land to the west and north of the consented Phase 1 for a total of 350 new dwellings, of which 250 are applied for in detail (Phase 2A), with the remaining 100 in outline (Phase 2B). The parcel of land that bounds the land to the north forms the outline element of the application (Phase 2B), and as such, the internal layout of these parcels of land and associated internal road networks have not yet been designed in detail, with further information on the layout to be provided as part of subsequent reserved matters applications.</p> <p>In terms of the land to the north of the Cottage Farm, to provide vehicular access to the site there are two main options.</p> <p>a) either from Sutton Close to the north</p> <p>b) via Phase 2B of the development to the south.</p>	

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		<p>The northern boundary of the site abuts existing residential properties. These properties are accessed from the short Cul-de-Sac lengths from Sutton Close and Triton Drive.</p> <p>Bowbridge Land Ltd has confirmed the acquisition of 8 Sutton Close, which lies towards the south eastern boundary of Sutton Close and provides a logical point of access into the wider development land to the south. Bowbridge Land Ltd and the owners of 8 Sutton Close have an option agreement in place which will guarantee delivery of the access in the form agreed as being acceptable with the highways department. Further evidence of this can be provided if necessary.</p> <p>It is further anticipated, and considered appropriate, that a link between the promoted site (OAD007) site and Phase 2B of the Cottage Farm development could be also delivered and this could form part of any reserved matters application for the northern element of the Phase 2B application which is currently approved in outline only.</p> <p>Confirmation has been provided by Bowbridge Land Ltd that the landowners are in agreement on the potential to deliver the link between the two sites. On the basis of the above, it is therefore considered that the site can be appropriately accessed, and access is not a barrier to development in this regard.</p> <p>It is imperative that a variety of size and types of sites are allocated for housing across the Borough to provide choice to the market and headroom for delivery against the objectively assessed requirement and economic</p>	

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		<p>growth aspirations. This development would make an important contribution to meeting the Borough’s identified need for new additional housing and 5-year housing land supply position, in a time of a national housing crisis. The options for development of the site illustrated within these representations and the separate submissions on behalf of Bloor Homes Limited indicate the potential for delivery within the early part of the plan period.</p> <p>The site is considered suitable, available and achievable for residential development, being promoted for development by a developer – as outlined in the Call for Sites submission. Development of the site for housing would enable the Council to make efficient use of land and maximise the delivery of housing for the Plan period, forming a logical extension to the existing settlement and Cottage Farm Direction of Growth Area.</p>	
<p>DLP Planning Ltd on behalf of Bowbridge Land Limited, 14th May 2024</p>	<p>OAD/007: Land South of Sutton Close, Oadby</p>	<p>CONCLUSION</p> <p>It is considered that the site to the south of Sutton Close (OAD/007) is an entirely suitable allocation to meet housing needs for the plan period.</p> <p>Allocation the site will offer opportunities to achieve the three stands of sustainable development through:</p> <p>A) Economic – Offering employment opportunities through the construction process, longer terms spending from future residents and an overall strengthening of the local economy through the provision of housing in the area</p> <p>B) Social – delivering a range and mix of house type to meet all housing needs over the plan period. The delivery</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>of housing is a clear political priority and the failure to deliver housing over recent years is resulting in negative implications for communities, the economy and the environment.</p> <p>C) Environmental – deliver housing in this location will not adversely impact upon any recognised features of merit, heritage suspects, landscape, not adversely affect the operation of the remaining areas of Green Wedge in the locality. The site can make efficient use of the highly sustainable edge of urban area location and the site offers opportunities to access a diverse range of amenities without the need to rely upon the use of the private car.</p> <p>There are no drainage or access constraints.</p> <p>There are no access constraints.</p> <p>The land use represents compatible activity in the immediate locality, which is dominated by established residential development together with services and facilities (including education uses) within the main urban area.</p> <p>Allocation the site fully integrates well into the adjoining Cottage Hall Farm strategic land allocation and represents a logical infill opportunity to deliver a substantial quantum of the Borough's emerging housing needs over the plan period.</p>	

Appendix 1 – Wigston Site Options (WIG/001 – WIG/014)

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<p>G Longley Planning and Property Services on behalf of Davidsons Developments Ltd</p> <p>14th May 2024</p>	<p>WIG/001: Land West of Welford Road, Wigston</p>	<p>Objection</p> <p>Appendix 1 to the Preferred Options document includes potential development sites submitted through the two Call for Sites processes undertaken by the Council. Land at Welford Road under the control of Davidsons Developments is included as site WIG_001, Land West of Welford Road.</p> <p>Paragraph 12.1.11 advises that none of the sites submitted have yet been assessed for their appropriateness and the document does not assess the extent as to whether a site is deemed appropriate or not.</p> <p>However, the Preferred Options document is accompanied by a Sustainability Appraisal Report, March 2024 undertaken by LUC which does include Sustainability Appraisal Findings for Site Options at Chapter 5 and Table 5.1.</p> <p>Reviewing the appraisal findings for site WIG_001, West of Welford Road we would wish to make the following comments on the SA appraisal of the site. The site is identified as having potential significant negative effects in relation to SA Objectives, SA7, Historic Environment, SA9 Landscape and SA18 Efficient Use of Land.</p> <p>For SA7 the criteria for a significant negative effect is that the site is within 600 m of a heritage feature. This would seem to be based on the fact that the Grand Union Canal Conservation Area is less than 600 m to the south of the</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p> <p>Comments regarding the SA have been addressed by LUC in their latest iteration of the SA.</p>

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		<p>site. This assessment ignores the fact that the site would have no impact on the character of this heritage feature. The site cannot be seen from the Canal, with existing development and the railway between the site and the canal corridor. The assessment should be re-scored as 0 – negligible effect.</p> <p>For SA9, Landscape, the assessment criteria advises that effects are uncertain until a specific design is known but that in the interim large sites over 1ha in the countryside are scored as having a potentially significant negative effect. This ignores the fact that for site WIG_001 information on the design proposals for the site are known through the submitted outline application for up to 87 dwellings (application reference 22/00266/OUT). The supporting application documentation includes a Landscape Appraisal by Golby and Luck that demonstrates that the development of the site would not have an unacceptable impact on the wider landscape, surrounded as it is by existing built development. Taking account of this evidence the SA assessment should be re-scored as 0- negligible effect.</p> <p>The submitted outline planning application demonstrates that site WIG_001 is a suitable and sustainable development option. There are no overriding objections from relevant statutory agencies and the site should therefore be included as an allocation in the next stage of the plan to help meet the Borough Council's future housing requirements.</p>	
Fisher German on behalf of	WIG/002: Wigston Meadows	These representations have been prepared on behalf of David Wilson Homes East Midlands in respect of their land interests at Wigston Meadows. Wigston Meadows is an	The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account

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<p>David Wilson Homes East Midlands</p> <p>14th May 2024</p>	<p>Phase 3</p>	<p>established extension of Wigston, with Phase 1 (450 units) largely built out by Barratt and David Wilson Homes. Phase 2 has been allocated within the Borough of Oadby and Wigston Local Plan 2011 – 2031 (April 2019), and largely approved under an outline permission for 650 units (21/00028/OUT), albeit there were also other applications securing parcels to the west, adjacent to Welford Road which have been built out by David Wilson Homes (18/00533/FUL) and Redrow Homes (17/00539/OUT and 19/00160/REM). These representations are therefore submitted to secure allocation of the logical Phase 3 of this urban extension, which is identified in the Council's SHLAA as WIG/002 (Wigston Meadows Phase 3).</p> <p>David Wilson Homes are a respected national housebuilder, part of the Barratt David Wilson group, one of the nations most important housebuilders, who deliver high quality new residential development and who have a strong track record of delivery in the local area. David Wilson Homes are proud to have been awarded the Home Builders Federation (HBF) 5 Star Home Builder status for 15 consecutive years. This accolade demonstrates the quality of both our client's product and service; awarded only to housebuilders who receive a higher than 90% recommendation by their customers. David Wilson Homes remain the only major housebuilder to achieve this accolade over such an extended period of time.</p>	<p>of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach</p>
<p>Fisher German on behalf of David Wilson Homes East Midlands</p>	<p>WIG/002: Wigston Meadows Phase 3</p>	<p>In respect of these representations our client's land interests are identified in Appendix 1 of the Consultation document under Wigston Meadows Phase 3 (WIG/002). This is identified as a circa 26ha site capable of delivering at least 400 dwellings. The site summary confirms that the site would act as a 'continuation' of the approved Phase 2</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p>

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14 th May 2024		<p>development, as allocated in the extent Local Plan.</p> <p>The Council will be aware that Wigston Meadows is successfully delivering. Our client confirms demand remains high and Phase 1 will sell out imminently, in good time for the transition to Phase 2 which has secured outline consent and with Reserved Matters applications again imminent, with our client about to fully acquire the site in accordance with the agreement with the landowners. With an improving market it is projected that uptake on Phase 2 will increase, thus the identification of Phase 3 will provide additional certainty and enable Phase 2 to be developed to integrate into Phase 3 as fully as possible, in accordance with proposed Policy 2.</p> <p>In terms of background, it is noted and pertinent that the adopted Policies map for Oadby and Wigston clearly illustrates the intention to extend Wigston Meadows through additional phases not formally allocated within the Plan (Figure 3), but clearly identified as the 'illustrative phase 3'.</p> <p>Paragraph 4.2.11 and 4.2.12, as amended by the Inspector through the Local Plan Examination Main Modifications states:</p> <p><i>“However, the additional new homes figure identified at Phase 3 of the Wigston Direction for Growth (at least 300) allows the Council a ‘buffer’ against the Plan period target of 2,960. Release of Phase 3 of the Wigston Direction for Growth would only be required should delivery of other identified or allocated sites within the Plan be slower than expected or the Council was in a position whereby it could not illustrate a 5 year supply of housing land. The</i></p>	<p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p><i>additional homes figure could help fulfil a small proportion of Leicester City's declared unmet need. Delivery of Phase 3 of the Wigston Direction for Growth is not dependent upon completion of Phase 2 and both Phase 2 and Phase 3 can be delivered simultaneously if necessary.</i></p> <p><i>Should delivery of allocated sites be slower than envisaged by the Plan, or evidence suggest a need for further development, the land identified as Phase 3 of the Wigston Direction for Growth Area (on the Adopted Policies Map) shall be released for development. Any proposal would not be subject to cumulative strategic transport testing as the Plan period requirement of 2,960 has already been subject to appropriate testing. However, appropriate local 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 will be required. 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".</i></p> <p>Paragraph 4.2.36 states:</p> <p><i>"300 new additional homes at the Wigston Direction for Growth Area, are identified for Phase 3, which is planned for post Plan period (2031 onwards). However, should evidence suggest a need for further development at the Wigston Direction for Growth, it will be brought forward in conformity with the Council's trigger policy set out within this Plan. The Council does not expect or foresee any circumstances that could affect the delivery of new homes on any of its allocated sites, however the Council seeks to</i></p>	

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		<p><i>plan positively through this Local Plan”.</i></p> <p>Paragraph 36 of the Planning Inspectorate’s Inspector Claire Sherratt’s report on the Examination of the Borough of Oadby and Wigston Local Plan (March 2019) states “<i>in addition, land identified for Phase 3 of the Wigston Direction for Growth area, which is not reliant upon completion of Phase 2 first, should be released should delivery of other identified or allocated sites be slower than expected or if the Council is unable to demonstrate a five-year supply of housing land”.</i></p> <p>The Planning Inspectorate have therefore already confirmed that Phase 3 of Wigston Meadows is acceptable for development as a matter of principle, assumed to come forward at the end of the adopted Plan period in 2031, and under the terms of the adopted Plan could be brought forward 11 at any stage if there was to be a shortfall of housing land supply. However, identification through the emerging Local Plan is considered the optimal approach to the identification of strategic housing sites, particularly in the context that the Borough’s most recent Housing Implementation Strategy (2023) points to a strongly performing land supply of 7.99 years and the most recent available Housing Delivery Test results (2022) indicate 141% delivery. In this context Wigston Meadow’s Phase 3 current strategic value will be providing supply required through the development of the new Plan, including assisting in meeting Leicester City’s unmet need, and is considered the logical first choice given the aforementioned context. However, should there be a need to expedite delivery in the Borough it remains identified as being able to serve this function also.</p>	

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		<p>As identified through the Inspector's Report Phase 3 can deliver concurrently with Phase 2, and it is likely at some point there will be some crossover, as there has been with Phase 1 and the initial stages of the Wigston Direction of Growth Area (Phase 2), albeit the lion's share of that development as secured by outline 21/00028/OUT is still to be delivered and will largely deliver subsequently given Phase 1 is now largely sold out (https://www.dwh.co.uk/newhomes/dev002421-wigston-meadows/).</p> <p>Turning to the Council's evidence on the site, notwithstanding the wealth of evidence which supported applications for Phase 1 and 2 which are available in the public domain, the Council have published an assessment document 'Call for Sites: Sites Collation and Initial Assessment Spring 2024 Update' which provides a high-level assessment of the Phase 3 site, based on the initial site submission through the Call for Sites. This confirms that the site could be available in circa 6-10 years as a continuation of Phase 2, albeit as set out above depending on outlets delivering it may well be that there is some crossover and delivery on Phase 3 begins earlier. David Wilson Homes have set out they project the first completions on the main Phase 2 site to be complete in May 2025 (subject to timely determination of the relative reserved matters and discharge of conditions applications), with Phase 2 to be fully sold by August 2030. Build out of Phase 3 is anticipated to be to completed within 3-4 years of commencement, again depending on the number of outlets. Notwithstanding that the site can deliver concurrently with Phase 2, as established by the extant Local Plan Inspector, if Phase 3 was to be delivered subsequently of the Phase 2 site, it</p>	

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		<p>remains anticipated that it will be fully built out by the end of the Plan period in 2041, providing an extra 400+ dwellings to the Council's overall supply.</p> <p>The Sites Collation and Initial Assessment Spring 2024 Update document also confirms that the site is in the ownership of 2 landowners, albeit that both are fully supportive of the proposals. It is noted that the site is being advanced by David Wilson Homes under a suitable legal mechanism meaning ownership is not a constraint to the site's eventual development and the site should be considered fully deliverable.</p> <p>David Wilson have sales and viability data from Phase 1 and from work associated with Phase 2, and have confirmed that Phase 3 would be fully viable and can make the associated Section 106 payments necessary to facilitate the development.</p> <p>Whilst the Council will undertake further assessment, it is noted that the Inspector to the extent Local Plan clearly considered the Phase 3 site to be suitable for development, essentially confirming in the event of a land supply shortfall it should be approved. The site is within Flood Zone 1 and is a broadly unconstrained. Suitable treatments may be required adjacent to the railway but these can be agreed in accordance with Network Rail's safety and operational requirements. The existing agricultural buildings will be demolished. The site will benefit from new links into the Phase 2 land, providing convenient sustainable access to the local centre, primary school, and spine road which has been designed to facilitate bus movements. Attractive routes have already been created in the initial phases of development and this</p>	

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		<p>will be continued in Phase 3 to create an attractive network to encourage walking and cycling, improving local health outcomes. Phase 3 will also provide local areas for play, to ensure children have ready access to outdoor spaces within sufficiently close proximity to their house.</p> <p>In conclusion it is apparent that the allocation Phase 3 of Wigston Meadows is not only logically appropriate, but was actively considered inevitable through the examination of the extant Local Plan. David Wilson Homes therefore welcomes the opportunity to work with the Council to establish a suitable vision and strategic framework for the allocation of Phase 3 in the emerging plan. If beneficial, David Wilson Homes can prepare a strategic masterplan to show how Phase 3 can successfully integrate with the forthcoming regime of Reserved Matters applications for Phase 2. We trust that these representations are clear, however should Officers have any questions, or wish to meet to discuss the site further, this would be welcomed. Whilst we understand that procedurally the Council will need to undertake its own assessments of options, including through the SA, however if David Wilson Homes can be of any assistance during this process, please do let us know.</p>	
G Longley Planning and Property Services on behalf of Westernrange Limited, Jelson Homes and David	WIG/008: Land at Newton Lane	<p>Appendix 1 to the Preferred Options document includes potential development sites submitted through the two Call for Sites processes undertaken by the Council. Land north of Newton Lane under the control of Westernrange Limited, Jelson Homes and David Wilson Homes is included as site WIG_008, Land at Newton Lane, along with land to the east of Parkdale and Wensleydale Road.</p> <p>Paragraph 12.1.11 advises that none of the sites</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish</p>

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<p>Wilson Homes, 14th May 2024</p>		<p>submitted have yet been assessed for their appropriateness and the document does not assess the extent as to whether a site is deemed appropriate or not.</p> <p>However, the Preferred Options document is accompanied by a Sustainability Appraisal Report, March 2024 undertaken by LUC which does include Sustainability Appraisal Findings for Site Options at Chapter 5 and Table 5.1.</p> <p>Reviewing the appraisal findings for site WIG_008, land at Newton Lane we would wish to make the following comments on the SA appraisal of the site. Overall, the site scores well against the Sustainability Criteria compared with other potential strategic development options, with six significant positive effects noted. The site is identified as having potential significant negative effects in relation to SA Objectives, SA8, Natural Environment, SA9 Landscape and SA18 Efficient Use of Land.</p> <p>For SA8, Natural Environment, the assessment criteria indicates that a significant negative effect will be applied where the site is within 250m of a nationally designated biodiversity or geodiversity site or if it contains a locally designated site. The Extended Phase 1 Habitat Survey, 2017 undertaken by LUC shows the site containing three small Candidate Local Wildlife Sites focused on existing ponds within the site (see extract at Appendix 1). The Concept Masterplan for the site shows that these existing features can be retained as part of the open space network for the site and therefore the assessment should be revised to 0- negligible effect.</p> <p>For SA9, Landscape, the assessment criteria advises that</p>	<p>background evidence to underpin its approach.</p> <p>Comments regarding the SA have been addressed by LUC in their latest iteration of the SA.</p>

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		<p>effects are uncertain until a specific design is known but that in the interim large sites over 1ha in the countryside are scored as having a potentially significant negative effect. This does not take account of the masterplanning work undertaken for the site which demonstrates how the site would not impact on the existing Green Wedge or the wider landscape. The Masterplan Proposals provide for improved access to the Green Wedge along the site's northern boundary and the potential to extend Brocks Hill Country Park. The Vision Document accompanying these representations shows how the proposals have taken careful account of the landscape setting of the site and its relationship to the Green Wedge. Based on this evidence, the SA assessment should be re-scored as 0- negligible effect.</p> <p>The Masterplan Proposals submitted as part of these representations and at the earlier Regulation 18 consultation demonstrates that site WIG_008 and adjoining land are suitable and sustainable strategic development option and the site should therefore be included as an allocation in the next stage of the plan to help meet the Borough Council's future housing requirements.</p>	
<p>Define Planning and Design on behalf of Bloor Homes Limited, 14th May 2024</p>	<p>WIG/010: Land North of Glen Gorse Golf Course, Wigston</p>	<p>LAND NORTH OF GLEN GORSE GOLF COURSE (SITE REF. WIG/010):</p> <p>Define Planning and Design write on behalf of Bloor Homes Limited (BHL) in response to the Oadby and Wigston Local Plan Preferred Options consultation to make 2no. submissions in relation to BHL's land interests at 'Land North of Glen Gorse Golf Course' (Site Ref. WIG/010) and 'Land South of Sutton Close, Oadby' (Site</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish</p>

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		<p>Ref. OAD/007). Though the sites are able to be delivered separately, they are related given their proximity to each other, and have the potential to form Phases 3 and 4 of the committed Cottage Farm, Oadby development.</p> <p>Each submission contains formal representations within the required response form, a 'USP document' that demonstrates the opportunity for the delivery of sensitively designed development within each site and the benefits that would be realised as a result, and an Access Feasibility Study (which is identical within each submission) that demonstrates that the development of both sites can be accommodated within the existing A6 / Jamie Marcus Way signal junction that has been delivered to facilitate the committed Cottage Farm development.</p>	background evidence to underpin its approach.
<p>Define Planning and Design on behalf of Bloor Homes Limited, 14th May 2024</p>	<p>WIG/010: Land North of Glen Gorse Golf Course, Wigston</p>	<p>DEVELOPMENT AT LAND NORTH OF GLEN GORSE GOLF COURSE (SITE REF. WIG/010):</p> <p>Site Suitability:</p> <p>BHL has land interests to the north of Glen Gorse Golf Course (site reference WIG/010 in the LPPO).</p> <p>The site's eastern boundary borders the committed 'Cottage Farm Phase 2' development that is being delivered by BHL, and therefore the site will be located immediately adjacent to the built form in due course. Glen Gorse Golf Course is located to the site's south. Land to the west of the site is agricultural in nature and forms the open countryside, but notably the proposed developable area would not extend further west than residential development to the north (discussed in further detail below).</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>The site is well-related to the existing southern edge of Oadby's urban form. It therefore benefits from nearby services and facilities, including the primary school, high school and college to the north, and the Glen Road Local Centre, which offers a large convenience store, petrol station, and medical centre. It is also well connected to Oadby Town Centre to the north, which has a range of local convenience stores and local shops, two post offices, a library, a doctors surgery, a dentist, and places of worship. Oadby also has a wide-ranging recreational offer, including a leisure centre incorporating playing pitches, a number of gyms, sports pitches, play areas, the nearby Coombe Park, a golf course, and a visitor centre.</p> <p>Residents of Oadby can also access Leicester via bus, and therefore are able to benefit from the full range of services and facilities on offer therein; with the 31, X3, and X31 services that run along the A6 to the east of the site offering regular services to the city centre.</p> <p>The site itself is not subject to any insurmountable constraints, and is therefore suitable for residential development. The following points are noted:</p> <ul style="list-style-type: none"> • An Access Feasibility Report has been prepared that considers this site alongside the land that is being promoted by BHL to the immediate north (Ref. OAD/007). The report highlights that the development of both sites can be accommodated within the existing A6 / Jamie Marcus Way signal junction that has been delivered to facilitate the BHL development to the east (Cottage Farm Phases 1 and 2). • There is opportunity to access nearby facilities and 	

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		<p>services through the provision of pedestrian and cycle links through the committed Cottage Farm development to the north-east. Should the site be allocated alongside BHL's land to the north, connections through to Tilton Drive / Sutton Close can also be delivered to provide access to nearby facilities, including educational uses.</p> <ul style="list-style-type: none"> • The site is located in Flood Zone 1, and the entirety of the site is at very low risk of surface water flooding. • The site is not subject to any statutory or non-statutory ecological designations, and there are no immediately obvious ecologically sensitive features within the site. • The site has no internal trees, and none of the trees at the site's boundaries are subject to Tree Preservation Orders (TPO). Tree and hedgerow loss at the site's boundaries will be very limited, relating only to those areas that are required to facilitate access, and will be more than offset through the proposed tree planting in green corridors and open spaces. • There are no statutory or non-statutory heritage assets within proximity to the site, and it is not located in a conservation area. 	
<p>Define Planning and Design on behalf of Bloor Homes Limited, 14th May 2024</p>	<p>WIG/010: Land North of Glen Gorse Golf Course, Wigston</p>	<p>Green Wedge:</p> <p>It is recognised that the site forms part of the Green Wedge between Oadby and Wigston, as defined by OWBC's adopted Local Plan (aLP).</p> <p>The aLP states that that the purpose of Green Wedges is to "protect important areas of open land which influence development form and have a positive effect on people's health and well being." On that basis, Policy 42 of the aLP identifies the following four objectives of Green Wedges:</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<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; and • Act as a recreational resource. However, through the aLP's examination OWBC made clear (see paragraph 3.2, 'Further Green Wedge Note') that the countryside designation is "considered by the Council to be of a much higher value than the green wedge designation in the context of its release for strategic urban built development", and that "the countryside designation is more restrictive than the green wedge designation, as the purpose of the green wedge is not to restrict the growth of the urban area, but to ensure that, as the urban area extends, open land is incorporated." There is, therefore, a recognition that Green Wedges should be continually reviewed as part of the preparation of a plan's spatial strategy, and that the housing need of the Borough is a key factor within that. <p>OWBC undertook a Green Wedge Review (GWR) in 2017 as part of the aLP's preparation. That concluded that the Oadby and Wigston Green Wedge (OWGW) should be extended to cover the full extents of the Lucas Marsh Local Nature Reserve, and to cover land to the south-west of the Cottage Farm Phase 2 development; including site ref. WIG/010. BHL objected to the proposed extension of the OWGW at that point, and maintains its view that the two sites being promoted are not integral to its function, and that they can be sensitively developed without undermining the retained Green Wedge. The Vision Document that has been submitted alongside these representations highlights how development can be facilitated within the site whilst still contributing to the</p>	

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>purposes and objectives of the residual Green Wedge in this locality. The findings of the Vision Document are summarised below.</p> <p>The GWR Joint Methodology states that designated Green Wedge areas should contribute, or be able to contribute, to all four of the stated objectives, and they are each considered in the submitted document.</p>	
<p>Define Planning and Design on behalf of Bloor Homes Limited, 14th May 2024</p>	<p>WIG/010: Land North of Glen Gorse Golf Course, Wigston</p>	<p>Green Wedge Functions 1 and 2:</p> <p>Green Wedge Functions 1 (preventing the merging of settlements) and 2 (guiding development form) are inter-related.</p> <p>In relation to Function 2, it is important to first consider the current context in terms of the requirement for OWBC to identify a sufficient quantum of housing to meet its own housing needs in full, and deliver the agreed contribution towards LCC's unmet needs. Given the land constraints in the Borough, and that a number of the promoted sites / potential directions of growth are subject to suitability or deliverability constraints as set out above, there are very limited opportunities to meet that need without resulting in the loss of some Green Wedge. Therefore, a change to the currently designated area is required, and the focus should therefore be on understanding which areas of land make a less significant contribution to the functionality of the OWGW and can be developed without significant harm to the extent and function of the retained elements of the Green Wedge.</p> <p>Both sites fall into that category, and can therefore be removed from the OWGW for sensitive residential</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>development; be that individually or collectively. The overarching Leicestershire wide GWR Methodology states that Purpose 1 is underpinned by an intention to safeguard “the identity of communities within and around urban areas that face growth pressures”, and highlights that this point should be considered in terms of both physical separation and the perception of distance between two settlements.</p> <p>At the closest pinch point between the dwellings fronting Wigston Road and the rear gardens of dwellings at Hidcote Road (i.e. the land containing Oadby Town Football Club and Parklands Leisure Centre), the gap is just 307m. Moving south from that, the current gap widens to 528m, and then narrows again to 477m at the south-western corner of Tilton Drive (near to the northern site’s north-west corner). Critically, the Masterplans for the development of the sites have evolved to ensure that built development would not extend further west than the current eastern edge of Oadby. Therefore, the gap between Wigston and the built form in the northern site (OAD/007) would not fall below 477m as is currently the case, and the gap between Wigston and the built form in the southern site (WIG/010) would be 845m. Therefore, the development of the sites would not result in coalescence between the settlements from a physical perspective.</p> <p>The fact that built development will not be seen as extending any further west than the current extents of Oadby will also mean that there will be very limited visual perception of coalescence. Rather, for the northern site, the new residential development will be screened by the built form in views from the north, and seen in the context of the school buildings and existing residential</p>	

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>development in views from the west, south and east. Likewise, for the southern site, new development will be seen as a natural extension to Phase 2 of the Cottage Farm development. Moreover, both sites will be well contained by the existing landscape framework, which will be enhanced through the structural tree and vegetation planting that is proposed in the emerging Masterplans.</p> <p>Therefore, the development of the sites will not result in physical or visual coalescence between Oadby and Wigston. Rather, the development of the sites will form natural extensions to the settlement to round off the built form, and will actually form a clear and well-structured edge to the retained Green Wedge, as set out in the Vision Document.</p>	
<p>Define Planning and Design on behalf of Bloor Homes Limited, 14th May 2024</p>	<p>WIG/010: Land North of Glen Gorse Golf Course, Wigston</p>	<p>Green Wedge Functions 3 and 4:</p> <p>With regard to the scale of the development, and therefore the extent to which the development of the sites will impact on functions 3 and 4 (which are also inter-related), it is noted that sites OAD/007 and WIG010 total 21.91ha, and therefore comprise 13% of the total area of the Oadby and Wigston Green Wedge. However, the emerging Masterplans demonstrate that just 9.83ha of residential development will be delivered across the two sites, with the remaining 12.07 hectares being retained as Green and Blue Infrastructure. The level of green infrastructure within the Green Wedge will, therefore, only reduce by 5.85%.</p> <p>Moreover, both sites are currently under private ownership, with public access limited only to the public right of way that runs around the edge of the southernmost site (ref. WIG/010). Presently, therefore, the sites make a</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>very minor contribution towards functions 3 and 4. Moreover, the development of the sites will actually enhance their recreational role. The existing public footpath will be retained and, rather than leading through private land, will now connect to publicly accessible and high-quality green infrastructure that will be available for the enjoyment of new and existing residents, connecting with new footpaths in both developments. The development of the sites will, therefore, enhance the experience of users of the public footpath who are seeking to access the wider countryside.</p> <p>The generous areas of green infrastructure that will be delivered through the development of the sites will also significantly increase the quantum and quality of publicly accessible, usable recreational space. As above, both Masterplans deliver multi-functional and high-quality green infrastructure, which will incorporate public open space, new tree planting, direct and convenient footpath links, and drainage features. Specifically, the delivery of the sites will provide an expansion to Brocks Hill Country Park at the north-west of the northern site, additional playing pitches at the east of the northern site, and orchards at the south-western extents of the southern site. Therefore, that will realise significant recreational benefits to new and existing residents.</p>	
Define Planning and Design on behalf of Bloor Homes Limited,	WIG/010: Land North of Glen Gorse Golf Course, Wigston	<p>Conclusion:</p> <p>Given the scale of the housing requirement and limited land in the Borough, the release of some areas of the Green Wedge for development is necessary. The nature of the two sites and their robust landscape frameworks mean that any potential harm in terms of physical and</p>	The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
14 th May 2024		<p>perceived coalescence will be effectively negated through the careful consideration of the built form and the implementation of a robust landscape strategy; both of which underpin the emerging Masterplans. Moreover, the sites play a very limited role in terms of promoting access to the countryside, and supporting its recreational use.</p> <p>Therefore, it is clear that the sites do not contribute significantly to any of the Green Wedge objectives, and can be removed without undermining its purpose; which is in contrast to some promoted sites that form an integral part of the Green Wedge.</p> <p>Therefore, the development of the sites being promoted by BHL can be accommodated without any harm to the OWGW, and would actually round off the built form and enhance the recreational offer by increasing the quantum of publicly accessible Green Infrastructure. Therefore, in addition to delivering much-needed housing, the development of the sites would realise significant benefits by promoting access to the countryside, enhanced recreation provision and health and wellbeing. Their removal from the OWGW is entirely appropriate.</p>	<p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
<p>Define Planning and Design on behalf of Bloor Homes Limited,</p> <p>14th May 2024</p>	<p>WIG/010: Land North of Glen Gorse Golf Course, Wigston</p>	<p>Development Potential of Land North of Glen Gorse Golf Course (WIG/010):</p> <p>The emerging Masterplan for the site's development, as presented in the Vision Document that has been submitted alongside these representations, has been prepared on the basis of a detailed understanding of the site and its context, and will deliver a landscape-led scheme that responds to the site's surroundings, maintaining the functionality of the Green Wedge, and rounding off the</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>built form. Through the Masterplanning process, consideration has also been given to how the site and the adjacent land to the north (ref. OAD/007) can be delivered comprehensively to facilitate a high-quality new development; though the sites are also able to be delivered individually.</p> <p>The Masterplan for this site proposes vehicular access through the 'Cottage Farm Phase 2' development to the east, with development comprising simple perimeter blocks that will be served either directly off the spine road or from secondary roads from it. The arrangement of houses in perimeter blocks will ensure that rear gardens are secured and that an active frontage is provided to the primary route and open spaces.</p> <p>The Masterplan incorporates a healthy quantum of open space / green infrastructure. Taking account of the Green Wedge designation, land at the site's western edge will be kept free of built development to facilitate a wide green corridor. That will accommodate the existing public right of way that runs through the site's southern area, as well as new footpath / cycleways, structure planting, a play area, two orchard areas, and drainage features. As above, this will increase the quantum and quality of accessible green infrastructure in the OWGW, and will enhance connectivity with the wider countryside and associated recreational uses.</p> <p>Therefore, the Masterplan clearly demonstrates the suitability of the site, and its capacity to deliver c. 155 - 185 new homes in a well-contained and sensitive extension to the built form. Notably, the site is able to deliver in the first five years of the plan period in order to</p>	

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		support a five year supply of housing; with BHL having a strong and reliable track-record of housing deliveries both in the Borough and the wider Leicestershire area.	
Define Planning and Design on behalf of Bloor Homes Limited, 14 th May 2024	WIG/010: Land North of Glen Gorse Golf Course, Wigston	Conclusion: Given the clear need to maximise the delivery of suitable, available and deliverable sites to meet the OWLP's housing requirement, and that there is limited available land in the Borough, site WIG/010 must be removed from the Green Wedge and allocated for the residential development of c. 155 - 185 new dwellings within the OWLP. BHL would welcome the opportunity to discuss the site and its potential for development with OWBC ahead of the next round of consultation.	The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered. The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.

Appendix 1 – South Wigston Site Option (SWIG/001)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received

Appendix 1 – Oadby and Wigston (Cross-Settlement) Site Options (O&W/001 and O&W/002)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received

Sustainability Appraisal and Habitat Regulations Assessment

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
<p>G Longley Planning and Property Services on behalf of Davidsons Developments Ltd</p> <p>14th May 2024</p>	<p>Sustainability Appraisal Findings for Site Option WIG/001: Land West of Welford Road, Wigston</p>	<p>Objection.</p> <p>Appendix 1 to the Preferred Options document includes potential development sites submitted through the two Call for Sites processes undertaken by the Council. Land at Welford Road under the control of Davidsons Developments is included as site WIG_001, Land West of Welford Road.</p> <p>Paragraph 12.1.11 advises that none of the sites submitted have yet been assessed for their appropriateness and the document does not assess the extent as to whether a site is deemed appropriate or not.</p> <p>However, the Preferred Options document is accompanied by a Sustainability Appraisal Report, March 2024 undertaken by LUC which does include Sustainability Appraisal Findings for Site Options at Chapter 5 and Table 5.1.</p> <p>Reviewing the appraisal findings for site WIG_001, West of Welford Road we would wish to make the following comments on the SA appraisal of the site. The site is identified as having potential significant negative effects in relation to SA Objectives, SA7, Historic Environment, SA9 Landscape and SA18 Efficient Use of Land.</p> <p>For SA7 the criteria for a significant negative effect is that the site is within 600 m of a heritage feature. This would seem to be based on the fact that the Grand Union Canal Conservation Area is less than 600 m to the south of the</p>	<p>Comments regarding the SA have been addressed by LUC in their latest iteration of the SA.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>site. This assessment ignores the fact that the site would have no impact on the character of this heritage feature. The site cannot be seen from the Canal, with existing development and the railway between the site and the canal corridor. The assessment should be re-scored as 0 – negligible effect.</p> <p>For SA9, Landscape, the assessment criteria advises that effects are uncertain until a specific design is known but that in the interim large sites over 1ha in the countryside are scored as having a potentially significant negative effect. This ignores the fact that for site WIG_001 information on the design proposals for the site are known through the submitted outline application for up to 87 dwellings (application reference 22/00266/OUT). The supporting application documentation includes a Landscape Appraisal by Golby and Luck that demonstrates that the development of the site would not have an unacceptable impact on the wider landscape, surrounded as it is by existing built development. Taking account of this evidence the SA assessment should be re-scored as 0- negligible effect.</p> <p>The submitted outline planning application demonstrates that site WIG_001 is a suitable and sustainable development option. There are no overriding objections from relevant statutory agencies and the site should therefore be included as an allocation in the next stage of the plan to help meet the Borough Council’s future housing requirements.</p>	
G Longley Planning and Property	Sustainability Appraisal Findings for	Appendix 1 to the Preferred Options document includes potential development sites submitted through the two Call for Sites processes undertaken by the Council. Land north	Comments regarding the SA have been addressed by LUC in their latest iteration of the SA.

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
<p>Services on behalf of Westernrange Limited, Jelson Homes and David Wilson Homes,</p> <p>14th May 2024</p>	<p>Site Option WIG/008: Land at Newton Lane</p>	<p>of Newton Lane under the control of Westernrange Limited, Jelson Homes and David Wilson Homes is included as site WIG_008, Land at Newton Lane, along with land to the east of Parkdale and Wensleydale Road.</p> <p>Paragraph 12.1.11 advises that none of the sites submitted have yet been assessed for their appropriateness and the document does not assess the extent as to whether a site is deemed appropriate or not.</p> <p>However, the Preferred Options document is accompanied by a Sustainability Appraisal Report, March 2024 undertaken by LUC which does include Sustainability Appraisal Findings for Site Options at Chapter 5 and Table 5.1.</p> <p>Reviewing the appraisal findings for site WIG_008, land at Newton Lane we would wish to make the following comments on the SA appraisal of the site. Overall, the site scores well against the Sustainability Criteria compared with other potential strategic development options, with six significant positive effects noted. The site is identified as having potential significant negative effects in relation to SA Objectives, SA8, Natural Environment, SA9 Landscape and SA18 Efficient Use of Land.</p> <p>For SA8, Natural Environment, the assessment criteria indicates that a significant negative effect will be applied where the site is within 250m of a nationally designated biodiversity or geodiversity site or if it contains a locally designated site. The Extended Phase 1 Habitat Survey, 2017 undertaken by LUC shows the site containing three small Candidate Local Wildlife Sites focused on existing ponds within the site (see extract at Appendix 1). The</p>	

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		<p>Concept Masterplan for the site shows that these existing features can be retained as part of the open space network for the site and therefore the assessment should be revised to 0- negligible effect.</p> <p>For SA9, Landscape, the assessment criteria advises that effects are uncertain until a specific design is known but that in the interim large sites over 1ha in the countryside are scored as having a potentially significant negative effect. This does not take account of the masterplanning work undertaken for the site which demonstrates how the site would not impact on the existing Green Wedge or the wider landscape. The Masterplan Proposals provide for improved access to the Green Wedge along the site's northern boundary and the potential to extend Brocks Hill Country Park. The Vision Document accompanying these representations shows how the proposals have taken careful account of the landscape setting of the site and its relationship to the Green Wedge. Based on this evidence, the SA assessment should be re-scored as 0- negligible effect.</p> <p>The Masterplan Proposals submitted as part of these representations and at the earlier Regulation 18 consultation demonstrates that site WIG_008 and adjoining land are suitable and sustainable strategic development option and the site should therefore be included as an allocation in the next stage of the plan to help meet the Borough Council's future housing requirements.</p>	
Stantec on behalf of Bloor Homes	Appendix 1 – Regulation 18B Site	Appendix 1 of the Preferred Options document sets out all of the sites which have been submitted as site options to date. Appendix 1 establishes that, across all of the	Comments on the SA have been addressed by LUC in their latest iteration of the SA.

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<p>Limited and the Pierce Family (Landowners)</p> <p>15th May 2024</p>	<p>Options & Sustainability Report (March 2024)</p>	<p>potential residential sites, there is capacity for approximately 5600 homes. This equates to 266 homes per annum (over the plan period to 2041) which is more than the three growth options set out at point 2.2.5 of the SA (March 2024) and also exceeds the Standard Method requirement by 26 dwellings per annum). However, at this stage none of the sites have been tested. It is very probable that once testing is undertaken a number of the 33 sites (20 of which are solely residential) could be discounted as not being achievable due to viability and sustainability constraints. We caution that the housing capacity number of 5,600 could quickly be eroded down and leave little to no buffer against the housing need. Ensuring that the Council identifies enough sites for allocation which have the cumulative potential to deliver a number of homes which exceeds the housing need, with a sufficient buffer will be important. Particularly in light of the implications of BNG which could take up developable area meaning large strategic sites deliver less homes than anticipated/accounted for in the plan.</p> <p>Although testing of the sites within Appendix 1 has not yet been undertaken, the SA (March 2024) does set out the context for some of the figures derived at this stage. Point B.40 of the SA comments upon the housing need and delivery relating to the currently adopted Local Plan. Between the period 2011 to 2031 a minimum of 148 dwellings per annum are provided. The SA goes on to state that 'Completion figures have been steady over the last few years, in addition, commitment figures have also been steady, meaning the Council is able to maintain a consistent 5-year supply of new homes' (note 'bold' is our emphasis). In terms of what 'steady' means, the most recent monitoring reports for the Council include the</p>	

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		<p>Residential Land Availability 2022/2023 report. This report sets out the net housing completions per year between 2011 and 2023. Bearing in mind that the requirement of the current Local Plan is 148 homes per year the completions across the 2011 to 2023 period averaged 137.6. Point 3.3 of the RLA Report states that the total provision in the borough has been 1,651 which is below the current 1,776 target. However, the Council are confident that this shortfall is to be negated as 'all the Direction for Growth Allocations' have planning permission and are 'delivering at a good pace'.</p> <p>We do acknowledge that in more recent years, since 2019, average housing delivery has been 218 which is significantly higher than the 137.6 average (2011-2018). This has also involved an increase in delivery of affordable homes from an average of 27.8 per year to 118 in the 2022/2023 period. However, this increase in delivery is somewhat skewed due to progress which has been seen on the Direction for Growth Areas (strategic allocations) across the borough. There appears to be a reliance of the Council upon these large schemes coming forward to meet housing need for which delivery of homes has been weighted towards the latter part of the plan period. As part of this plan review, the Council need to identify:</p> <ul style="list-style-type: none"> - More sites for allocation to ensure there are a range of timescales for delivery (0-5 years, short term, 6-10 years medium term and 11+ years). - Recognise that large (strategic) greenfield allocated sites are likely to become more important and need to come forward, as smaller, brownfield and urban sites become increasingly sparse 	

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		<p>Our site presents an ideal opportunity to provide more certainty around housing delivery that will meet the boroughs needs over the course of the New Local Plan to 2041. The 500-home capacity site sits to east of the Wigston Meadows and Growth Area allocation, comprises low grade agricultural land and could be phased to deliver homes at a varied timescale and to support and account for delivery of required infrastructure.</p> <p>Point 3.7 of the RLA document reports on the number of homes which are currently 'committed development' within the borough. These commitments account for 1,393 of the housing supply in the borough, a significant number of homes. The term 'committed development' includes sites granted permission subject to a signed S106 and those under construction, which in our view carry less risk in terms of delivery. However, 'committed' also includes 'sites granted planning permission that have not yet commenced'. These sites are of more concern as there is a possibility that delivery may not occur, particularly in light of the shifting economic and political climate. In these cases, permissions could expire and the timescale for delivery of these sites will be later than accounted for within the Local Plan, if delivered at all. We would encourage the Council to approach this Local Plan review proactively and look to allocate more sites to ensure that housing supply exceeds need as this could help to account for any under delivery on the previous plan.</p> <p>We also advise that, since adoption of the current Local Plan there have been some planning policy changes which have significant implications for developers and could mean many developments are held in abeyance or found to be undeliverable. This could also have</p>	

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		<p>implications on the current (2023) 5-year housing land supply of 7.33 to 8.36 years (Oadby & Wigston Housing Implementation Strategy 2023, Page 8). For example, the requirement for mandatory BNG 10% gain on all sites (major from February 2024 and minor from April 2024). As discussed at part 2.8 above, it is not currently clear how the Council will approach BNG, regardless of this detail, it will certainly impact upon the deliverability of many sites weather that be the viability of sites in their entirety or the number of dwellings that can be delivered on sites due to developable area reduction. Again, more sites need to be identified through this New Local Plan consultation and assessed for allocation.</p> <p>With regard to the site options identified, the SA (March 2024) sets out within Table C.1 the 'Assessment Criteria' for the sites. The assessments have made a number of assumptions which feed into the scoring presented for each site in relation to each sustainability objective. For example, for the 'Housing Provision' objective, it has been assumed that 'All potential residential sites are expected to have positive impact...it is assumed that housing development will incorporate an appropriate proportion of affordable homes'. However, as we have set out in our representations above, unless policies which will impact viability of sites, namely Policy 12 and Policy 8, this assumption is unlikely to be the reality. Many sites will have to underdeliver on affordable homes in order to be viable under the other policy pressures. This reasserts our view that the Council need to 1) reassess policy wording and contributions required, 2) identify more sites for allocation to ensure affordable housing number can be achieved.</p>	

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<p>Stantec on behalf of the Co-operative Group and the University of Leicester</p> <p>14th May 2024</p>	<p>Vision and Spatial Objectives</p>	<p>Our Clients note the Council’s approach to their 15 spatial objectives, which feed into policies addressing issues such as housing delivery, and that these are underpinned by the spatial and demographic context of the borough. This is set out in the first part of the draft Local Plan. The spatial objectives and subsequent policies have all been subject to a sustainability appraisal. This is pleasing to see as each ‘preferred approach’ has been assessed for its economic, social and environmental impacts and chosen above a reasonable alternative. Our Clients support the Council’s approach here.</p>	<p>Comments regarding the SA have been addressed by LUC in their latest iteration of the SA.</p>

APPENDIX 2 – ORGANISATIONS REPRESENTATIONS (WITH OFFICER RESPONSES)

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General Comments

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<p>Canal and Rivers Trust</p> <p>Monday 13th May, 2024</p>	<p>General</p>	<p>The Canal & River Trust is the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Canal & River Trust (the Trust) is a statutory consultee in the Development Management process, and as such we welcome the opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded and enhanced within an appropriate policy framework.</p> <p>Within Oadby & Wigston Borough the Trust owns and operates and is Navigation Authority for over 5km of the Grand Union Canal (Leicester Line). This stretch of canal runs along or close to the southern boundary of the Borough between Top Gate Lock (Lock 33) in the west and Turnover Bridge (Br. 82) in the east. It includes some 6 locks and 11 bridges and is designated as a conservation area; east of Kilby Bridge (Br. 87) the canal is also designated as a Site of Special Scientific Interest (SSSI). The Kilby- Foxton SSSI is designated for its diverse and abundant aquatic plant communities, especially Pondweeds, some of which are particularly uncommon.</p>	<p>Noted.</p>

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		<p>Inland waterways are acknowledged as significant green infrastructure, but they also function as blue infrastructure, serving as a catalyst for regeneration; a sustainable travel resource for commuting and leisure; a natural health service acting as blue gyms and supporting physical and healthy outdoor activity; an ecological and biodiversity resource; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape; a contributor to water supply and transfer, drainage and flood management. The waterway network forms part of the historic environment and the character of the Borough.</p>	
<p>Environment Agency Thursday 20th June, 2024</p>	<p>All Sites</p>	<p>The Environment Agency have reviewed the environmental constraints associated with each of the sites provided within Appendix 1 from the perspective of those issues for which we have a remit – namely whether the site: lies within flood zones 2 or 3; is in proximity of a Main River of the Environment Agency; is either in close proximity of or atop an Authorised Landfill, or is atop a Historic landfill. We have also carried out this exercise for an additional site for which we have been provided a red-line boundary outline for, namely WIG/015: Land South of Newton Lane.</p> <p>Except for the following list, all of the sites lie within Flood Zone 1, land deemed at lowest risk of flooding, and, according to the best available information available to the Environment Agency have no environmental constraints for which we have a remit.</p> <p>[Sites listed are included in Appendix 1 commentary].</p>	<p>Noted.</p>
<p>House Builders</p>	<p>General</p>	<p>The HBF notes that this version of the draft plan does not contain any site allocations although it does contain a list</p>	

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<p>Federation (HBF)</p> <p>Wednesday 15th May, 2024</p>		<p>of all of the sites that have been submitted as site options to date. The HBF also notes that the new Local Plan will take account of Leicester City Council's declared unmet needs, specifically housing, and that the Plan period start date is consistent with those dates set out within the Leicester and Leicestershire Authorities Statement of Common Ground.</p> <p>Duty to co-operate The Council will need to ensure that they engage effectively with neighbouring areas with regard to housing needs. In particular the council will need engage with its partners in the Leicester and Leicestershire Statement of Common Ground to ensure that it is kept up to date and reflects the latest evidence available to the Council.</p> <p>Format The HBF would strongly recommend that the Council ensure that all of the text within the Plan has paragraph numbers and that the clauses and bullets within the policies are numbered or lettered to ensure ease of use for all.</p> <p>Plan Period The Council proposes a plan period of 2020 to 2041. The start date of the Plan is consistent with the dates set out within the Leicester and Leicestershire Authorities Statement of Common Ground relating to Housing and Employment Land Needs (June 2022). The NPPF is clear that strategic policies should look ahead over a minimum 15-year period from adoption, and that where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take in account the likely</p>	<p>The Council continues to work proactively with all Partners in Leicester and Leicestershire to fulfil and maximise the benefits of the duty to co-operate. The consistent approach to collaborative working ensures that all strategic decision making and emerging evidence is aligned to all emerging Plans, including that of the Borough of Oadby and Wigston's.</p> <p>The Council notes the suggested formatting changes and will endeavour to include paragraph numbers throughout to aid ease of referencing for all customers.</p> <p>In reference to the suggestion that the Plan Period end date may need to be kept under review to take account of the need to ensure that the Plan will still provide 15 years on adoption, the Council will do all that it can to adopt the Plan by 2026 to ensure a 15-year Plan period. Should that not happen, the Council will be guided by the Planning Inspectorate on necessary steps to adopt and publish the Plan.</p> <p>The Council appointed a Consultant to undertake the Whole Plan Viability Assessment (WPVA) on its behalf. This WPVA tested all Policies and Site Allocations to ensure that the Regulation 19 Pre-Submission Draft Plan is deliverable.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>timescale for delivery. Therefore, the HBF considers that the Council may need to keep the end date of the plan period under review to ensure that the Plan will still provide 15 years on adoption.</p> <p>The HBF has not been able to find an up-to-date Viability Assessment. The HBF considers that a viability assessment will need to be prepared to reflect the current Plan policies and requirements and the current costs. Without this part of the evidence, the HBF is not able to comment on the deliverability of the policy requirements or the Local Plan overall.</p>	
<p>Leicester, Leicestershire and Rutland Integrated Care Board (LLR ICB)</p> <p>Thursday 16th May, 2024</p>	<p>General</p>	<p>The LLR Integrated Care Board (ICB) are supportive of the vision and emerging objectives set out within the consultation document and would want to continue to work collectively with you to understand in more detail how the local NHS can contribute to its delivery.</p> <p>Many of the themes identified in the consultation will impact upon the wider determinants of health and as a result population health outcomes. We would therefore welcome working together to maximise the opportunity for health and wellbeing within the vision of any housing growth in Harborough District.</p> <p>In general, we would welcome:</p> <ul style="list-style-type: none"> • Actions to support the goal of sustainable development and community identity; maximising opportunities for residents to come together to create community cohesion and support each other, and protection of community facilities 	<p>The support and the expressed desire to work collaboratively is welcomed and the Council will endeavour to continue to work with LLR ICB to ensure positive outcomes with regards to health and wellbeing for all.</p> <p>The Council has engaged with LLR ICB on the emerging relevant Policies, as well as local evidence base documents, including the Council's Infrastructure Delivery Plan and the Developer Contributions Supplementary Planning Document update.</p> <p>The Council has also engaged with LLR ICB on its emerging Design Code for the Borough.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<ul style="list-style-type: none"> • Ensuring continued ease of access to the surrounding countryside and green spaces, and protection of natural habitats and green and blue infrastructure, which will improve the physical and mental health of residents • Actions to create and sustain local jobs and opportunities for new ways of working are welcome, as this is a large contributor to people’s health and wellbeing. • Future development being designed in such a way to enhance physical and mental health and wellbeing, and also supporting people to live and age well • Plans to ensure that there are a range of options for travel within the area that enable residents to get to and from work and leisure easily, including active travel options • Designs that support the reduction in carbon emissions, as this has a direct impact on some resident’s health • Consideration given to the needs of members of the community that are at greater risk of experiencing health inequalities, such as Gypsies, Travellers and Travelling Showpeople and ethnic minorities • It is also important to note that any increase in the number of new residents in any area will have a direct impact upon local NHS services whether that is primary, hospital or community care and therefore any new demand from housing developments will require developer contributions to mitigate this 	
<p>Leicestershire County Council</p> <p>Wednesday 15th May, 2024</p>	<p>Delivering high quality developments that last</p>	<p>Beautiful and high quality developments</p> <p>The importance of high quality attractive, environments to peoples’ quality of life and health and wellbeing is recognised. But, the Plan policy(ies) and text need to be strengthened to place greater emphasis on the need to ensure that ‘beauty’ and quality can be maintained over</p>	<p>The Council is committed to reviewing and refreshing its approach to securing Developer Contributions to ensure appropriate contributions are sought to mitigate the impact of new development over the emerging Plan period.</p>

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		the lifetime of a development, including through the securing of appropriate maintenance arrangements (which could include the payment of commuted sums by developers).	The Council is undertaking a review and update to its existing Developer Contributions Supplementary Planning Document as part of the emerging suite of evidence it is developing. This document will engage all key partners, as well as be subject to Whole Plan Viability Assessment and public consultation, to ensure its approach is sound, robust and justified.
Leicestershire County Council Wednesday 15th May, 2024	General	It is assumed that the Borough Council has decided not to produce a separate policy, on the back of its earlier Reg.18 consultation, to address tourism and the visitor economy, despite acknowledgement in 2.2.14 that “Tourism in the Borough plays a small yet important role in the local economy in relation to the centres of Wigston, Oadby, South Wigston and the settlement of Kilby Bridge, as well as large areas of green space including Brocks Hill Country Park, Leicester Racecourse, and the Botanical Gardens in Oadby.” These are considered USP’s in this area, and there are opportunities for business tourism through use of conference facilities at the University and Stage Hotel.	Tourism and the leisure economy has been incorporated throughout the document in various contexts, but in Policy terms, Tourism has been integrated into Draft Policy 15: Retail and Related Policies.
Leicestershire County Council Wednesday 15th May, 2024	Local Nature Recovery Strategy (LNRS)	Local Nature Recovery Strategy The first Local Nature Recovery Strategy (LNRS) for Leicester, Leicestershire and Rutland is currently being prepared. Leicestershire County Council is the responsible authority leading on the preparation of the LNRS for the area working with other partners and organisations to agree what should be included in the LNRS. Reference to this emerging strategy, in particular its purpose and aims should be included in the Plan.	The Council will ensure that reference(s) to the Local Nature Recovery Strategy are incorporated into the Regulation 19 Pre-Submission Draft Plan.

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<p>Leicestershire County Council</p> <p>Wednesday 15th May, 2024</p>	<p>Other General Comments</p>	<p>Other comments</p> <p>i) It would be helpful to embed hyperlinks in the document, e.g. to the Policies Map and other documents referred to.</p> <p>ii) There are a number of cases where the draft Local Plan’s text and/or policies overlap but in doing so use differing terminology about the same subject in principle.</p> <p>From a transport perspective, examples include:</p> <p>a. Objective 7 talks about “...<i>growth...will not have significant detrimental impacts on the current highway network...</i>” but draft Policy 14 says “...<i>where the proposed use...will not unacceptably impact upon on the...highway network</i>” (and neither is consistent with the wording of the National Planning Policy Framework in this regard).</p> <p>b. Draft Policy 17 talks about “...<i>appropriate level of car parking...</i>” whilst Draft Policy 20 says “<i>All new development must ensure there is suitable provision of car parking spaces...</i>” and Draft Policy 21 references “...<i>sufficient car parking to meet the needs of the development...</i>”</p> <p>c. In Draft Policy 20 its sets out that “...<i>All new development must ensure there is suitable provision of...Electric Vehicle charging facilities...</i>”, whilst draft Policy 24 says “...<i>Deliver well-considered and usable parking..., including suitable electric vehicle charging points...</i>”</p>	<p>Noted.</p> <p>i) Noted. The Council will endeavour to make the document as accessible for all, as possible.</p> <p>ii) Noted. The Council will endeavour to ensure that language used is consistent throughout the emerging draft New Local Plan document.</p> <p>iii) Noted. Oadby Sewage Treatment Works is a current employment land allocation in the Borough of Oadby and Wigston’s Adopted Local Plan (2019) up to 2031. The Council will ensure that all appropriate stakeholders, including Leicestershire County Council, are engaged as appropriate moving forward.</p> <p>iv) Noted. The Council will ensure that is takes account of the Leicestershire Minerals and Waste Local Plan (LMWLP) as part of the Site Selection Analysis.</p> <p>v) Noted. The Council welcomes ongoing dialogue with the Education Department via the Duty to Co-operate as the emerging draft New Local Plan continues to take shape. Input on all emerging Site Allocation Policies, as well as key evidence base such as the Council’s Infrastructure Delivery Plan will be essential.</p> <p>vi) Noted. The Council will endeavour to ensure that language used is consistent throughout the emerging draft New Local Plan document.</p>

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		<p>iii) LCC would welcome further engagement where appropriate regarding development of the Oadby Sewage Treatment Plant.</p> <p>iv) It is noted that the Council is considering 32 site submissions covering circa 336.17 hectares of land. In taking sites forward, the impact to – or from – any existing minerals or waste sites should be taken into account. Development should not prejudice existing minerals and waste uses, and the ‘agent of change principle’ should be used. Minerals safeguarding areas should also be taken into account, as well as existing infrastructure for the processing of minerals or waste in line with the Leicestershire Minerals and Waste Local Plan (LMWLP).</p> <p>v) From an Education perspective, we have no further comment to make above and beyond comments we have made in previous consultations. We continue to have an open dialogue with Oadby and Wigston and have provided them with school data to help them identify sites to bring forward in their plan.</p> <p>vi) There are some areas of the Plan where supporting text is softer than policy text, e.g. para 5.10.3 uses the word ‘should’ whereas the policy uses the word ‘must’ when the same point is being made.</p>	
<p>Leicestershire County Council</p> <p>Wednesday 15th May, 2024</p>	<p>All Sites</p>	<p>The Local Highway Authority (LHA) has not reviewed in any detail the sites listed in Appendix 1: Reg 18B Site Options.</p> <p>From an initial look, it is noted that many of the listed sites are adjoining/clustered together and thus have the potential to form part of larger-scale, comprehensive</p>	<p>The recommendation for the Local Plan spatial strategy to focus growth on a small number of relatively large sites, as opposed to a strategy that scatters development of growth across a large number of smaller sites throughout the Borough is welcomed.</p>

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		<p>development. Furthermore, some of the listed sites are at the edge of the Borough's boundaries and thus it is possible they may need to be considered in the context of cross-boundary coordination, masterplanning and assessment (including transport) should they adjoin site locations proposed in emerging neighbouring Local Plans.</p> <p>This comment is particularly relevant to any adjoining strategic scale sites in the Leicester and Leicestershire Strategic Growth Plan's Priority Growth Corridor, whereby sites in the Borough of Oadby & Wigston have the potential to act as 'gateways' to the Corridor.</p> <p>Notwithstanding this, and acknowledging the spatial nature of the Borough and the constraints that it places on options for site allocations, from a transport perspective a Local Plan spatial strategy that seeks to focus growth on a small number of relatively large sites – as opposed to one that scatters development of growth on a large number of smaller sites across the Borough – would provide the greatest opportunities for securing the coordinated provision (including through developer contributions) of transport measures and infrastructure required to enable the growth, mitigate its impacts and to deliver wider health and environmental benefits.</p> <p>Any sites proposed to be included in the Local Plan should be underpinned by appropriate evidence and accompanied by policy requirements in respect of transport as necessary, and the LHA reserves its right to comment further on any proposed site allocations as the development of the Local Plan progresses.</p>	<p>The Council is working with all Partners to evidence this emerging draft Plan. In addition, the Council is taking a proportionate approach to the development and delivery of necessary local evidence to ensure all proposed Policies and proposed site allocations are deliverable and justified.</p> <p>Therefore, the Council welcomes the suggestion that any sites proposed to be included in the Local Plan should be underpinned by appropriate evidence and accompanied by policy requirements, for example, in respect of transport requirements.</p>

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		<p>The County Council, including in its role as the Local Highway Authority, would welcome the opportunity to support the Borough Council in terms of its work to develop its Reg19 Local Plan, in particular to seek to discuss and reflect the comments set out in this response.</p>	
<p>Leicestershire County Council</p> <p>Wednesday 15th May, 2024</p>	<p>Strategic Planning</p>	<p>Pivoting to the Strategic Growth Plan spatial vision for Leicester and Leicestershire</p> <p>The next (and indeed subsequent) Oadby & Wigston Local Plan has (have) an important role to play in pivoting the Housing Market Area to the Strategic Growth Plan spatial vision; in effect the Borough is a 'gateway' to the Priority Growth Corridor. The role the Plan needs to play includes in particular:</p> <ul style="list-style-type: none"> • To provide an appropriate policy framework to enable: <ul style="list-style-type: none"> - Cross-boundary coordination, masterplanning and assessment (including in transport terms) of sites which otherwise are separated by an administrative boundary (and there would need to be complementary policy in Local Plans adjoining the Borough). (By way of some practical examples, a site in the Borough may need to be designed in such a way to allow multi-modal accessibility to/connectivity for a strategic site in the Priority Growth Corridor, or it may be possible to delivery an education solution that meets the needs of growth within and without the Borough.) - Following on from the above, to make provision as necessary for sites in the Borough to include safeguarded land to provide for transport connectivity through them 	<p>The Council is committed to all aspects of its role and responsibility to fulfil and make best use pf the duty to co-operate with all relevant statutory and non-statutory Partners to ensure that the emerging New Local Plan will deliver the most sustainable and positive outcomes for the Borough of Oadby and Wigston, as well as for all neighbouring Authority areas, relevant organisations, infrastructure providers, and, the local community.</p> <p>The Council will endeavour to continue this ongoing collaborative approach and will continue to welcome and embrace all representations and engagement along the way.</p> <p>For example, the Council has ensured that all infrastructure providers have had the opportunity to input into the Infrastructure Delivery Plan that has been prepared as part of the evidence for the regulation 19 Pre-Submission Draft Plan.</p>

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		<p>(i.e. between growth in adjoining districts to places beyond the sites, including elsewhere in the Borough).</p> <p>- To describe, and as necessary provide the policy framework to enable, how the town and district centres in the Borough might need to flex/evolve/grow in future to provide for the future needs of residents of strategic growth areas in adjoining districts. Likewise in respect of employment provision.</p>	
<p>Leicestershire County Council</p> <p>Wednesday 15th May, 2024</p>	<p>Local Transport Plan</p>	<p>The next Local Transport Plan</p> <p>We are currently preparing our next Local Transport Plan (LTP4). The emerging LTP4 will seek to decarbonise the transport network, this will be achieved through providing viable alternatives to motorised based travel, provide alternative fuels and enable travel choice for our transport network users. The aim being to work collaboratively with communities, partners and key stakeholders providers to minimise the impact and reduce the emissions created by our transport networks to benefit the environment and health and wellbeing of our communities. We would welcome the opportunity to discuss how best to reflect our LTP4 in the Local Plan.</p>	<p>Noted.</p> <p>The Council has included appropriate reference(s) and inclusion of the objectives of the emerging Local Transport Plan (LTP4) in the Regulation 19 Pre-Submission Draft Plan.</p> <p>The Council will continue to liaise with Leicestershire County Council, via its duty to cooperate, as this Plan continues to emerge.</p>
<p>Marine Maritime Organisation</p> <p>Friday 3rd May, 2024</p>		<p>The MMO is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are: marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing grants. Marine Planning and Local Plan development Under delegation from the Secretary of State for Environment, Food and Rural Affairs (the marine planning authority), the</p>	<p>Noted.</p>

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		<p>MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the Mean High Water Springs (MHWS) mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of MHWS, there will be an overlap with terrestrial plans, which generally extend to the Mean Low Water Springs (MLWS) mark. To work together in this overlap, the Department of Environment, Food and Rural Affairs (Defra) created the Coastal Concordat. This is a framework enabling decision-makers to co-ordinate processes for coastal development consents. It is designed to streamline the process where multiple consents are required from numerous decision-makers, thereby saving time and resources. Defra encourage coastal authorities to sign up as it provides a road map to simplify the process of consenting a development, which may require both a terrestrial planning consent and a marine licence. Furthermore, marine plans inform and guide decision-makers on development in marine and coastal areas.</p> <p>Under Section 58(3) of Marine and Coastal Access Act (MCAA) 2009 all public authorities making decisions capable of affecting the UK marine area (but which are not for authorisation or enforcement) must have regard to the relevant marine plan and the UK Marine Policy Statement. This includes local authorities developing planning documents for areas with a coastal influence. We advise that all marine plan objectives and policies are taken into consideration by local planning authorities when plan-making. It is important to note that individual marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach.</p>	

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		<p>Local authorities may also wish to refer to our online guidance and the Planning Advisory Service: soundness self-assessment checklist. We have also produced a guidance note aimed at local authorities who wish to consider how local plans could have regard to marine plans. For any other information please contact your local marine planning officer. You can find their details on our gov.uk page.</p> <p>See this map on our website to locate the marine plan areas in England. For further information on how to apply the marine plans and the subsequent policies, please visit our Explore Marine Plans online digital service.</p> <p>The adoption of the North East, North West, South East, and South West Marine Plans in 2021 follows the adoption of the East Marine Plans in 2014 and the South Marine Plans in 2018. All marine plans for English waters are a material consideration for public authorities with decision-making functions and provide a framework for integrated plan-led management.</p>	
<p>National Highways</p> <p>Tuesday 14th May, 2024</p>	<p>Transport-related Comments</p>	<p>Sustainability</p> <p>We acknowledge that the Preferred Options (Reg 18B) Draft Local Plan has a specifically focus on policies to address the issues of climate change by reduction in carbon emissions, improving sustainable modes of transport and encouraging modal shift to these, development of energy efficient buildings, etc. We also note that the Council is currently preparing its Climate Change Strategy. National Highways supports the opportunities to meet net-zero ambitions, as we seek to identify opportunities to work with stakeholders to reduce</p>	<p>The Council takes note of the suggestion that in the case of the larger site(s) allocations, some of which 'may' be cross-boundary with neighbouring authorities, appropriate assessments in line with the Circular may be needed to determine the extent of their potential impacts on the Strategic Road Network (SRN).</p>

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		<p>the impact of carbon emissions on the environment.</p> <p>Housing and employment requirements</p> <p>We note that the Leicester and Leicestershire Housing and Employment Needs Assessment (HENA) of 2022, has identified that the Borough has a total need of 4.3 hectares of employment land, which equates to 1.3 hectares of Offices as well as 3.1 hectares of Industrial and Distribution. Further given the lack of market interest in the 8+ hectares allocated in the current Local Plan to 2031 and the reduced projected need of 4.3 hectares up to 2041, the Council's strategy for the emerging Plan period will be to retain and roll forward the current Local Plan employment allocations. Therefore, no further land will be allocated for employment development.</p> <p>We also note that, within the Leicester & Leicestershire Authorities - Statement of Common Ground relating to Housing and Employment Land Needs (June 2022), the proportion of Leicester City's unmet housing need attributed to the Borough area, is 52 homes per year. When combining this apportionment with the Council's standard method housing need figure of 188 new homes per year, subject to evidence, the Council will make provision for 240 new homes per year or 5,040 new homes over the 21 year plan period.</p> <p>A total of 32 Site Options are set out as currently available for consideration by the Council which, would have potential capacity for approximately 5,600 new homes (as submitted).</p>	

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		<p>12.1.11 However, we acknowledge that none of the sites submitted have yet been assessed for their appropriateness, because the Council has not fully developed the suite of evidence that would underpin the New Local Plan and its growth areas. As an example, evidence relating to the South Leicestershire Transport Assessment, or wider Leicester and Leicestershire Strategic Transport Assessment is not yet finalised. However, we understand that Oadby and Wigstone BC are involved in discussion with neighbouring authorities regarding development of the South Leicestershire Joint Transport Evidence Base, which would support the respective emerging Local Plans.</p> <p>Reviewing the list of Site Options, these would support varying levels of housing development. In the case of the larger sites, some of which are cross-boundary with neighbouring authorities, appropriate assessed in line with the Circular may be needed to determine the extent of their potential impacts on the SRN.</p>	
<p>Natural England</p> <p>Thursday 9th May, 2024</p>	<p>All Sites</p>	<p>All the allocations should incorporate opportunities for Green Infrastructure and biodiversity enhancement as identified by the Oadby & Wigston Green Infrastructure Study and evidence emerging from the Leicestershire & Rutland Local Nature Recovery Strategy.</p> <p>We also recommend that reference is made to the Green Infrastructure Framework: Principles & Standards (Green Infrastructure Home (naturalengland.org.uk)). This recently launched framework provides detailed information and up to date guidance on the provision of Green Infrastructure and will better support planning for good quality GI within developments.</p>	<p>The Council has sought to incorporate opportunities for green infrastructure and biodiversity enhancement for all emerging site allocations.</p> <p>The Council has referenced the Green Infrastructure Framework: Principles & Standards.</p> <p>The Council has ensured that it the biodiversity net gain requirements for the development, on and where appropriate, off-site, are set out accordingly. The Council will ensure that this is calculated using the</p>

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		<p>Any site for allocation in the local plan should clearly set out the biodiversity net gain requirements for the development including both on-site and where appropriate off-site provision. The Statutory Biodiversity Metric must be used to calculate the BNG requirements.</p>	<p>Statutory Biodiversity Metric.</p>
<p>The Coal Authority</p> <p>Wednesday 3rd April 2024</p>	<p>General</p>	<p>If you are a non-coalfield Authority</p> <p>The Coal Authority have no comments to make regarding planning applications or planning policies in areas which lie outside of the coalfield and therefore we will not provide a formal response to any consultations received. You can check if you are a coalfield Authority here.</p>	<p>Noted.</p>

Chapter 1 – Introduction

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
<p>Leicester City Council</p> <p>Wednesday 15th May, 2024</p>	<p>General transport issues</p>	<p>At this point in time, there is insufficient evidence to advise whether (on not) additional growth can be accommodated in transport terms and what (if any) specific transport measures are required to achieve is. However, the City Highway Authority look forward to continuing working with Oadby and Wigston Borough Council (and other south Leicestershire local authorities and Leicestershire County Council as Local Highway Authority) with the development of a transport evidence base to underpin its Plan.</p> <p>Leicester City Council seeks to have a greater involvement to fully understand the transport related impacts and the best way to seek to manage future growth to address any transport issues on the City’s transport system. These adverse impacts may include the A6 (London Road), A426, A5199, A47 (east and west), A50 and A5460.</p> <p>Any impacts identified, the City Council will expect the final Local Plan to provide a robust policy basis for dealing with cumulative and cross boundary impacts of growth, including where it impacts on the City’s transport system.</p> <p>The Council is supportive of the role walking, wheeling, cycling and bus travel, which is presented in the Plan, as this can play an important part in reducing traffic congestion and supporting sustainable growth in Oadby and Wigston. Given the short distances from the locations of development proposed to the City of Leicester, it is important to provide good quality alternatives to the car for those residents wishing to access Leicester for</p>	<p>The Council has engaged the City Council and seeking to mitigate any cross-boundary implications from the outset.</p> <p>In accordance with the duty to co-operate, all of the Leicester and Leicestershire Authority’s enjoy a positive and collaborative approach to strategic planning matters and it is important that this aligned approach continues to ensure sustainable delivery of emerging growth in each Authority area.</p> <p>The Council will seek to deliver infrastructure improvements on the strategic and local walking and cycling network as part of any detailed site-specific Masterplanning and off-site mitigation.</p> <p>The Council notes Leicester City Council’s support of the continued safeguarding of a Potential Transport Route between the Borough and the City.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>employment, leisure, and other opportunities. Securing high quality public transport links into the city is essential to support future growth, and contributions towards public transport infrastructure improvements are likely to be expected to support and enhance any new / extended services required.</p> <p>The Council has a strategy of removing any 'bus pinch points' on key bus routes in the city in order to facilitate better bus journey times, and bus journey reliability, therefore making buses a more attractive mode of transport.</p> <p>Finally, the Plan would need to consider if traffic calming measures to deter 'rat running' would be appropriate as well as road safety measures to alleviate any accident 'hotspot' areas and contributions towards improvements to the City Council's urban traffic control systems to enable a more efficient and responsive movement of traffic around the city.</p> <p>Leicester has a designated Air Quality Management Area (road traffic is the main source of pollution) and encouraging residents to travel by sustainable modes of transport into Leicester, would support the reduction of pollution from road traffic as well as being an effective way of increasing physical activity. We are supportive of the opportunities to encourage the use of low emission vehicles. Improvements of strategic and local walking and cycling links would be sought, connecting to the city, which would need to be considered as part of any detailed site-specific master planning.</p>	

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		<p>The Council is supportive of the safeguarding of a Potential Transport Route. The route has been included as part of the Strategic Transport Assessment testing of strategic highway intervention schemes that maybe required to facilitate any of the Strategic Growth Plan spatial options by 2051. Clearly, further work would need to be undertaken to understand any potential of a route.</p>	
<p>Leicestershire County Council</p> <p>Wednesday 15th May, 2024</p>	<p>Summary Comments</p>	<p>i) Given Leicester City’s declaration of unmet need only runs to 2036, the approach to ‘roll-over’ the apportioned figure of 52 homes per year for the entire plan period (to 2041) is considered sensible. However, it needs to be borne in mind that it is likely that the unmet housing need figure for the borough will increase in the 2036 to 2041 period which would mean provision would need to be made in the new Local Plan for more than the 52 dwellings per annum (as agreed to in the L&L SoCG on the apportionment of unmet housing and employment need to 2036) over and above the standard method figure for the borough (standard method figure in L&L SoCG 168 dwellings per annum). It is suggested that the ‘final’ version requires an additional chapter/section explaining (in broad terms) how the meeting of the City’s and (in all likelihood) O&W’s putative future unmet need will be addressed through the pivoting of the Housing Market Area’s spatial strategy to that of the Strategic Growth Plan (SGP) vision. This would also enable threads to be pulled together in respect of our other comments made elsewhere across the document in respect of the SGP.</p> <p>ii) There is no reference to the South Leicestershire Local Plan Making Statement of Common Ground (as per our Cabinet report of December 2021).</p>	<p>i) The Council will keep the position under review</p> <p>ii) The Council has referred to the South Leicestershire Local Plan Making Statement of Common Ground within the Regulation 19 Pre-Submission Draft Plan.</p> <p>iii) Appropriate reference and explanation of the role that the South East Leicestershire Transport Study (SELTS) is included within the Regulation 19 Pre-Submission Draft Plan.</p> <p>iv) Appropriate reference and explanation of the South Leicestershire Transport Assessment and to the wider Leicester and Leicestershire Strategic Transport Assessment is included within the Regulation 19 Pre-Submission Draft Plan.</p> <p>v) The Council has strengthened references to the Strategic Growth Plan and to the role that the Borough’s New Local Plan can play in facilitating the initial ‘pivot’ towards the SGP spatial distribution with regards to key strategic (and cross-boundary) development clusters in the ‘Priority Growth Corridor’.</p> <p>vi) The recommendation for the Local Plan spatial</p>

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		<p>iii) The South East Leicestershire Transport Study (SELTS) work is published evidence underpinning the current Local Plan, so it surprising that this draft Plan does not pick up on that and explain how that is carried forward.</p> <p>iv) The “<i>South Leicestershire Transport Assessment</i>” (SLTA) and “<i>wider Strategic Transport Assessment</i>” (L&L STA) are referred to in paragraph 1.4.8 without any accompanying (or prior) explanation of the respective purposes, context of and distinction between these two pieces of work – i.e. that the SLTA is derived from the SoCG referred to in point (ii) above and reflective of the cross-boundary nature of transport issues/growth impacts across the South Leics area, whereas the L&L STA is a HMA piece of work to inform future decisions on and implementation of the SGP. The absence of such explanation risks confusing anyone who is not directly involved in these pieces of work.</p> <p>v) Within the SGP section of this chapter (paras 1.9.1. to 1.9.5.) the 'bespoke' wording around the SGP's implications for O&W Borough is very muted and low-key - i.e. limited to a vague reference in the third bullet point of para 1.94. It is suggested that this fails to sufficiently set the scene for the important role this Local Plan could play in facilitating the initial 'pivot' towards the SGP spatial distribution with regards to key strategic (and cross-boundary) development clusters in the 'Priority Growth Corridor' within/surrounding the Borough and how the role of the Borough's main town/district centres may evolve in light of this.</p>	<p>strategy to focus growth on a small number of relatively large sites, as opposed to a strategy that scatters development of growth across a large number of smaller sites throughout the Borough is welcomed. The Council has endeavoured to strengthen references to the role of the site allocations within the Borough to achieve the vision of the Strategic Growth Plan, as well as to maximise the opportunity to secure meaningful infrastructure to mitigate the impact of new development and population growth.</p> <p>vii) As suggested, the Borough of Oadby and Wigston does not have any Town or Parish Councils and therefore there are currently no Neighbourhood Plans within the Borough. The Council has included text to strengthen the explanation of the positive role that Neighbourhood Planning can play in the locality.</p>

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		<p>vi) The importance of larger, more strategic, sites within the borough to aid the pivot towards the Strategic Growth Plan (SGP) needs to be strengthened. The SGP is referred to in the new Local Plan but it is considered that the role of larger sites as allocations within the Borough to achieve the vision of the SGP is underplayed. By allocating few larger sites in the Borough the opportunity to secure infrastructure will be maximised.</p> <p>vii) The document seldom mentions Neighbourhood Plans, and when it is, this has only been done when referring to national text. Whilst it is recognised that there are currently no Neighbourhood Plan groups within the Borough of Oadby & Wigston, it would be a positive addition to include references to encouraging and supporting future Neighbourhood Planning Forums being developed in area, especially in the absence of Town and Parish Councils.</p>	

Chapter 2 – Spatial Portrait

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
<p>Leicestershire County Council</p> <p>Wednesday 15th May, 2024</p>	<p>Spatial Portrait</p>	<p>No reference is made to the South East Leicestershire Transport Study (SELTS) study and its outcomes, including issues of cross-boundary rural rat-running to/from the Borough and through settlements such as Stoughton.</p>	<p>Noted.</p> <p>Appropriate reference and explanation of the role that the South East Leicestershire Transport Study (SELTS) has and will continue to play is included within the Regulation 19 Pre-Submission Draft Plan.</p>

Chapter 3 – Vision and Spatial Objectives

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
<p>Canal and River Trust</p> <p>Monday 13th May, 2024</p>	<p>Spatial Objective 15</p>	<p>Comment.</p> <p>Spatial Objective 15 seeks to promote appropriate regeneration of Kilby Bridge. As the canal forms an important feature in Kilby Bridge, it could help to provide a focus for suitably scaled development and/or regeneration proposals.</p> <p>It is important that any development proposals close to the canal carefully consider how the character and appearance of the canal is affected and ensure that its value as a designated heritage asset is protected.</p> <p>However, it is also important to consider the positive role the canal can play in supporting new development by creating an attractive backdrop and offering an accessible open space.</p> <p>It is important that development proposals consider whether there are potential opportunities to provide new or improved access to the canal to encourage greater use of the canal as a leisure and recreational resource that can benefit the local community.</p>	<p>Noted.</p>
<p>Environment Agency</p> <p>Thursday 20th June, 2024</p>	<p>Vision and Spatial Objectives</p>	<p>We support and welcome the wording of the Vision. We welcome the spatial objectives, in particular objectives 10, 11 and 12.</p>	<p>Support welcomed.</p>
<p>House Builders</p>	<p>Spatial Objective 7</p>	<p>Spatial Objective 7 is in relation to growth of the urban areas, this looks to make the efficient use of land and plan</p>	<p>Support welcomed.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Federation Wednesday 15th May, 2024		for suitable and well-located housing which meets identified need. This is generally supported by the HBF.	
House Builders Federation Wednesday 15th May, 2024	Spatial Objective 8	Spatial Objective 8 is in relation to a balanced housing market, the HBF considers that it is appropriate to include an objective relation to providing a balanced housing market and to providing housing opportunities that meet the housing needs of the entire local community across their lifetime, and that this should include a mix of type, tenure and affordability.	Support welcomed.
Leicestershire County Council Wednesday 15 th May, 2024	Vision	Whilst the Strategic Growth Plan is referenced in the Introduction, it is considered that this should also be set out in the Vision, capturing the intent of pivoting the delivery of growth to the spatial strategy set out in the Strategic Growth Plan to 2050. It is pleasing to see references towards net zero, climate change and health, however there could be a specific mention of the importance of infrastructure, such as new schools, and related mitigation of any adverse impacts of new growth including the conservation and/or reuse of valuable resources.	Noted.
Leicestershire County Council Wednesday 15 th May, 2024	Spatial Objective 3	The objective (number 3) to encourage the use of Oadby District Centre by Students from the Leicester University Manor Road Campus aligns well with proposals to substantially improve facilities, especially for cyclists, on the A6 corridor.	Noted.

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<p>Leicestershire County Council</p> <p>Wednesday 15th May, 2024</p>	<p>Spatial Objective 5</p>	<p>For Spatial Objective 5 (Improved employment opportunities), minerals and waste safeguarding should potentially be a consideration.</p>	<p>The Council considers reference to this would be better suited to Spatial Objective 11: High quality and sustainable design.</p> <p>The final sentence of the Objective has been amended to read:</p> <p><i>'All development will be required to respect local history, character, and vernacular, whilst incorporating measures to conserve energy, minimise flood risk, achieve sustainable energy generation, encourage active travel, safeguard minerals, and minimise and reuse waste'.</i></p>
<p>Leicestershire County Council</p> <p>Wednesday 15th May, 2024</p>	<p>Spatial Objective 6</p>	<p>In respect of objective 6 (Accessible transport links), opportunities to significantly improve the Borough's highway network beyond what has already been identified through SELTS are likely to be constrained, and as per the overarching comments the greater focus should be on seeking to create a more sustainable and active pattern of travel within the Borough, based around delivery of the South of Leicester Cycling and Walking Infrastructure Plan approved in October 2023.</p> <p>In the more longer-term, as and when strategic growth comes forward in the Strategic Growth Plan Priority Growth Corridor, there would be opportunities to explore how orbital road infrastructure required to open-up/serve the Corridor could have benefits in terms of providing alternative routes for traffic that currently travels through the Borough.</p>	<p>Noted.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
<p>Leicestershire County Council</p> <p>Wednesday 15th May, 2024</p>	<p>Spatial Objective 7</p>	<p>With regard to objective 7 (Growth of the urban areas):</p> <p>a. It is suggested that this is strengthened to reference at least accessibility for walking and cycling (including linkages to the wider Local Cycling and Walking Infrastructure Plan network)</p> <p>b. Preference would be for reference to highways impacts to be consistent with wording in NPPF (See also overarching comments at the end about inconsistent use of terminology.)</p>	<p>Spatial Objective 7 has been amended to read:</p> <p><i>'Make the most efficient use of the Borough's limited land and plan for suitable and well-located housing and employment which meets identified needs, as well as increase and enhance accessibility to a high quality cycling, walking and wheeling network (linking to the latest version of the Local Cycling and Walking Infrastructure Plan for the area). Allocation growth areas will have appropriate access to and will not have an unacceptable impact on highway safety on significant detrimental impacts on the current highway network'.</i></p>
<p>Leicestershire County Council</p> <p>Wednesday 15th May, 2024</p>	<p>Spatial Objective 9</p>	<p>It is suggested that there should be an additional objective under the "Healthy Empowered Communities" sub-heading concerning <i>"supporting/contributing towards the Leicester and Leicestershire Housing Market Area's (HMA) transition towards the long-term spatial vision set out through the Strategic Growth Plan"</i>. Notwithstanding the relatively smaller scale/more constrained nature of growth opportunities in the Borough compared to other areas of the HMA, the draft local plan nevertheless identifies potential opportunities to develop key sites (and clusters thereof) that would form part of/key gateways to potential wider/cross-boundary strategic development clusters within the SGP's Priority Growth Corridor. Additionally, the "Protected Transport Route" referenced later in the document could have a role in facilitating such opportunities both within and without the Borough.</p> <p>Regarding Objective 9 (Healthy Lifestyles), it is suggested</p>	<p>The Council considers reference to the Strategic Growth Plan would be better suited to Spatial Objective 8: A balanced housing market.</p> <p>An additional sentence has been added to the Objective, to read:</p> <p><i>... 'These growth areas will contribute towards the Leicester and Leicestershire Housing Market Area's (HMA) transition towards the long-term spatial vision set out through the Strategic Growth Plan for Leicester and Leicestershire'.</i></p> <p>The Title of Spatial Objective 9 has been changed to 'Enabling Healthy lifestyles Choices'.</p>

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		<p>that this is amended to 'Enabling Health Choices'. There is an emerging public health evidence base to suggest the word 'lifestyles' is a problematic word because it implies their individual choices and behaviours solely responsible for health outcomes this perspective overlooks the influence of social, economic and environmental factors on health. Public Health would advocate for more inclusive language such as 'health choices' or 'health practices' which would emphasise the broader context in which individual choices are made.</p>	
<p>Leicestershire County Council</p> <p>Wednesday 15th May, 2024</p>	<p>Spatial Objective 10</p>	<p>Objective 10 (Climate Change) could be broadened in scope by amending thus: "...a sustainable pattern of development and activity,..."</p>	<p>The second sentence of Spatial Objective 10 has been amended to read:</p> <p><i>'This will be achieved by promoting a sustainable pattern of development and activity, ...'</i></p>
<p>Leicestershire County Council</p> <p>Wednesday 15th May, 2024</p>	<p>Spatial Objective 11</p>	<p>It is suggested that Objective 11 (High quality and sustainable design) should be broadened to state that proposals should also be developed with long-term maintenance implications/arrangements in mind: avoiding schemes/treatments that are liable to deteriorate prematurely and/or create unaffordable maintenance liabilities such as to mean that the 'high quality' cannot be sustained.</p> <p>Suggest adding to the Vision, the part highlighted bold and underlined, to include waste prevention.</p> <p><i>...The Borough will progress towards net zero and be resilient to climate change through adaptation and mitigation measures whilst reducing its carbon footprint</i></p>	<p>The Council does not consider the amendment to Spatial Objective 11 to be appropriate in the context of referencing the need to refer to long-term maintenance implications / arrangements. This could be said for all forms of new development and therefore it is not appropriate to only refer to it in this context.</p> <p>The Vision has been amended to reflect the suggested change, as set out below:</p> <p><i>'... The Borough will progress towards net zero and be resilient to climate change through adaptation and mitigation measures whilst reducing its carbon footprint</i></p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p><i>through energy efficiency measures, waste prevention and nature-based solutions....</i></p> <p>Suggest adding the part highlighted in blue to spatial objective 11 to include the reuse of the waste le. recovered aggregates for a more circular approach to design.</p> <p><i>...All new development within the Borough, whether it is new build or conversion, will be required to illustrate the highest standards of design and construction. Design will also be a key component in ensuring that streets are safe from crime and anti-social behaviour and promote social inclusion and community cohesion. All development will be required to respect local history, character, and vernacular, whilst incorporating measures to conserve energy, minimise flood risk, achieve sustainable energy generation, encourage active travel, and minimise and reuse waste...</i></p>	<p><i>through energy efficiency measures, waste prevention and nature-based solutions’.</i></p> <p>The final sentence of the Spatial Objective 11 has been amended to read:</p> <p><i>‘All development will be required to respect local history, character, and vernacular, whilst incorporating measures to conserve energy, minimise flood risk, achieve sustainable energy generation, encourage active travel, safeguard minerals, and minimise and reuse waste’.</i></p>

Chapter 4 – Spatial Strategy (Policies 1, 2 and 3)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
<p>Charnwood Borough Council</p> <p>Friday 10th May, 2024</p>	<p>Policy 1: Spatial Strategy for Development with the Borough</p>	<p><u>Housing requirement</u></p> <p>It is noted that the proposed plan period runs from 2020 to 2041, which includes the period covered by the agreed Leicester & Leicestershire Authorities - Statement of Common Ground relating to Housing and Employment Land Needs June 2022 (SoCG), and the Leicester and Leicestershire Strategic Growth Plan 2031 to 2050 (SGP).</p> <p>Charnwood Borough Council welcomes the proposed approach to housing provision which seeks to meet Local Housing Need for Oadby and Wigston together with accommodating unmet housing need from Leicester City up to 2036, as agreed through the SoCG. Charnwood Borough Council will continue to work with Oadby and Wigston and other partners in the Housing Market Area on the implementation of the SGP for the period after 2031, but the proposed housing requirement appears a reasonable basis for the plan whilst strategic work progresses.</p> <p><u>Employment Land Provision</u></p> <p>Charnwood Borough Council notes that the planned employment land provision of 8 hectares is in excess of the 4 hectares recommended through the jointly prepared Housing and Economic Needs Assessment. Charnwood Borough Council are therefore satisfied that the draft Local Plan provides for an appropriate amount of employment land.</p>	<p>Support welcomed.</p>

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		We will continue to work with Oadby and Wigston Borough Council as preparation of its Local Plan continues.	
House Builders Federation Wednesday 15 th May, 2024	Policy 1: Spatial Strategy for Development with the Borough	<ol style="list-style-type: none"> 1. The Council propose that this policy will provide a broad indication of the overall scale of development in the Borough. It is also intended that it will deliver the regeneration of the centres of Oadby, Wigston and South Wigston, with new development concentrated in the built-up urban areas and only utilising greenfield sites where necessary. However, the Council also identify that it would not be prudent to accommodate all new housing development within the Borough's urban areas and neither would this be the best approach to meeting housing needs across the Borough as a whole. 2. The Council set out that the proportion of Leicester City's unmet housing need attributed to the Borough is 52 dwellings per annum (dpa). They also set out that the Council's standard method identified local housing need is 188dpa. This is based on the Leicester and Leicestershire Housing & Economic Needs Assessment (LLHENA) from June 2022. It is noted that this is now a little out of date and that the Standard Method currently identifies a minimum Local Housing Need (LHN) of 198dpa¹. The LLHENA Housing Distribution Paper suggests that difference between Leicester's LHN and their supply generates an unmet need for Leicester of around 18,700 dwellings to 2036, 	These issues have been in the Regulation 19 Pre-Submission Draft Plan.

¹ MHCLG Household Projections 2014 2024: 22,279, 2034: 23,638, average change 135.9. Median workplace-based affordability ratio 11.3 (2023, release 25 March 2024). Adjustment factor: $((11.3-4)/4) \times 0.25 + 1 = 1.45625$.

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		<p>equivalent to 1,169dpa. The paper considers redistribution based on the functional relationship to Leicester, adjustments to support future economic growth, implied stock growth, adjustments to support deliverability and to manage commuting and adjustments based on the current plan provision and land supply. This has led to the paper proposing a housing requirement 240dpa for Oadby and Wigston. The Council have stated that they will make provision for 240dpa or 5,040 new homes over the 21-year plan period.</p> <p>3. The Council have highlighted that they are still to gather evidence and to assess the sites that have been submitted. And only once this evidence has been gathered will the Council be able to determine the full extent of the need for growth and the impacts of growth. The HBF considers that it is important that the Council gathers the appropriate evidence and uses this to support their proposed policies.</p> <p>4. The HBF considers that it is important that the spatial distribution of sites follows a logical hierarchy, provides an appropriate development pattern and supports sustainable development within all market areas.</p> <p>5. The HBF considers that the Council should consider the housing requirement to ensure that it reflects the local housing need identified by the standard method and gives consideration to the circumstances where a higher figure would be</p>	

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		<p>appropriate. The NPPF² states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method set out in the PPG. The PPG sets out the method for calculating the minimum annual local housing need figure³. As set out above, the HBF considers that this may need to be updated to reflect the latest evidence. The PPG⁴ also sets out when it might be appropriate to plan for a higher housing need figure than the standard method, these include where there are growth strategies for the area, where there are strategic infrastructure improvements, where an authority is taking unmet need from a neighbouring authority, and where previous levels of housing delivery, or previous assessments of need are significantly greater than the outcome from the standard method. The HBF strongly recommends that the Council considers all of these circumstances not just in relation to the need for addressing unmet needs.</p> <p>6. The HBF also notes that the LLHENA identifies an affordable housing need within Oadby and Wigston of 69 affordable home ownership dwellings per annum and 139 rented affordable dwellings per annum. This would be a significant proportion of the proposed housing requirement. It is noted that the PPG⁵ states that an increase in the total housing figures included in the plan may need to</p>	

² NPPF December 2023 Paragraph 61

³ PPG ID:2a-004-20201216

⁴ PPG ID: 2a-010-20201216

⁵ PPG ID: 2a-024-20190220

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>be considered where it could help deliver the required number of affordable homes. Therefore, the HBF considers that the Council should also be taking this affordable housing requirement into consideration as part of their housing requirement.</p>	
<p>Leicester City Council Wednesday 15th May, 2024</p>	<p>Policy 1: Spatial Strategy for Development with the Borough</p>	<p>Leicester City Council welcomes that Oadby and Wigston Borough Council have incorporated provision for 52 dwellings per annum in respect of Leicester's unmet need up to the end of Leicester's Plan Period in 2036, which is in line with the agreed Statement of Common Ground.</p> <p>In relation to paras. 1.4.6 and 1.4.7 of the Preferred Options Plan and as was discussed at our duty to cooperate meeting of 30 April 2024, it is not considered justifiable to roll forward the Borough's apportionment of Leicester's City's unmet need beyond 2036 on the basis of the existing statement of common ground. The city's estimated unmet need of approximately 10,000 dwellings for the years 2036-2041 derives from the approved and agreed Strategic Growth Plan (SGP).</p> <p>The SGP should inform preparation of the local plans of the Leicester and Leicestershire LPAs, and the figure of 550 dpa for City delivery post 2036 is considered to be an appropriate starting point for calculation of future unmet need requirements. It is accepted by the City that further capacity work and refinement will be needed once the city's own Plan position has been confirmed for our local plan at Examination this summer. Agreement between all relevant parties will be required to be reached on unmet need to facilitate progression of this and other local plans in the year ahead and it is recommended that a joint</p>	<p>Council has set out its approach in the Regulation 19 Pre-Submission Draft Plan and will keep the position under review as the situation evolves.</p>

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		<p>dialogue to secure a consensus with relevant partner Councils is initiated as a priority.</p> <p>It is also worth noting that there has been a recent change to the affordability ratio standard methodology housing calculation which has implications for Leicester's and Oadby and Wigston's housing need. We expect this to be reflected in the next stage of Oadby and Wigston's plan.</p> <p>Once the Leicester Local Plan 2020-2036 has been adopted, it will be immediately reviewed with evidence commissioned to predict the city's housing need beyond 2036.</p> <p>The Strategy proposed for higher density in the town centre is also welcomed to create sustainable development. Any proposed site allocations and densities around Leicester city borders will need careful design and master planning to ensure Impacts on city properties are minimised.</p> <p>Connectivity across borders is sensitively handled to secure a well coordinated development with the city. Whilst it is appreciated that site allocations have not yet been assessed for appropriateness, the City Council would welcome any further clarification of which sites may come forward within the Plan Period together with more details of your capacity assessment work.</p> <p>We will continue to support Oadby and Wigston Borough Council with the delivery of these sites and our sites through cross boundary cooperation but note this will need to be subject to appropriate consultation within the city boundary as well as within Oadby.</p>	

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<p>Leicestershire County Council</p> <p>Wednesday 15th May, 2024</p>	<p>Policy 1: Spatial Strategy for Development with the Borough</p>	<p>Given Leicester City’s declaration of unmet need only runs to 2036, the approach to ‘roll-over’ the apportioned figure of 52 homes per year for the entire plan period (to 2041) is considered sensible. However, it needs to be borne in mind that it is likely that the unmet housing need figure for the borough will increase in the 2036 to 2041 period which would mean provision would need to be made in the new Local Plan for more than the 52 dwellings per annum (as agreed to in the L&L SoCG on the apportionment of unmet housing and employment need to 2036) over and above the standard method figure for the borough (standard method figure in L&L SoCG 168 dwellings per annum).</p> <p>Additionally:</p> <p>i) The wording of the policy approach for New Homes appears to be in contradiction to the wording of para 1.4.2, i.e. “...<i>the Borough being highly constrained from an infrastructure and land availability point of view...</i>” Vs. “...<i>has a healthy supply of development land</i>”. In terms of context/scene setting from the outset, the sentiments of the Policy wording should be reflected much earlier in the Plan.</p> <p>ii) See previous comments about referring to the “<i>South Leicestershire Transport Assessment</i>” and “<i>wider Strategic Transport Assessment</i>” without any accompanying (or prior) explanation of the respective purposes, context of and distinction between these two pieces of work</p> <p>iii) In respect of the policy approach for New Jobs, it is suggested that the ‘final’ policy should sign-post the need</p>	<p>Council has set out it’s approach in the Regulation 19 Pre-Submission Draft Plan and will keep the position under review as the situation evolves.</p> <p>i) The context of the wording of paragraph 1.4.2 is referring to the current adopted Local Plan (planning for growth up to 2031) and the Council’s latest 5-Year Housing Land Supply position. Whereas, the wording in the context of the emerging Policy is referring to the prospect of planning for growth in the Borough up to 2041. Therefore, no change is needed in this instance.</p> <p>ii) Appropriate reference and explanation of the South Leicestershire Transport Assessment and to the wider Leicester and Leicestershire Strategic Transport Assessment is included within the Regulation 19 Pre-Submission Draft Plan.</p> <p>iii) The Council has incorporated some potential flexibility to the Policy in the context of new jobs and employment land, in order to provide towards / for meeting the needs of strategic growth in neighbouring districts, if applicable.</p> <p>The Council has ensured a healthy buffer is included in its overall calculations to meet its housing need up to 2041.</p>

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		<p>for potential future flexibility in employment land requirements in order to provide towards/for meeting the needs of strategic growth in neighbouring districts.</p> <p>The need to utilise a full suite of evidence to underpin the new Local Plan and its growth areas is noted and that site allocations will evolve in future iterations of the Plan.</p> <p>Minerals and Waste safeguarding is an important consideration.</p> <p>Comments from an LCC Landowner perspective With regard to housing number we would expect that in addition to Standard method numbers plus the City's unmet need allocation there would be an additional allowance of 10-15% to provide flexibility.</p>	
<p>Melton Borough Council</p> <p>Tuesday 14th May, 2024</p>	<p>Policy 1: Spatial Strategy for Development with the Borough</p>	<p>Melton Borough Council supports Oadby and Wigston Borough Council's ambition to prepare a new Local Plan and welcomes the continuation of positive cross-boundary working on strategic planning matters in line with the Duty to Cooperate. These comments are provided to assist Oadby and Wigston Borough Council's work.</p> <p>Given the geographical location of Oadby and Wigston borough, its settlements and their limited relation to Melton borough, the local plan is considered unlikely to result in significant cross-boundary impacts. A more informed position on any cross-boundary impacts will be formed as in due course as the local plan progresses.</p> <p>It is difficult to make commentary in relation to housing delivery targets and site allocations as the evidence base is not sufficiently advanced. At this stage we wish to</p>	<p>Support welcomed.</p>

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		<p>support proposals in the plan to address cross-boundary housing requirements, and meet the apportionment of Leicester City's unmet housing need as agreed in the Leicester & Leicestershire Authorities - Statement of Common Ground relating to Housing and Employment Land Needs (June 2022).</p> <p>The new local plan proposes to cover the period to 2041, as such further discussions between local authorities across the Housing Market Area about the post-2036 position in relation to the City's unmet needs would be helpful as a Duty to Cooperate priority.</p> <p>We agree that the HENA is an appropriate basis for formulating employment land need in Leicester and Leicestershire. The Council is seeking to provide employment land opportunities well in excess (8.22 hectares) of the identified need (4.1 hectares), conforming with the HENA approach agreed across Leicester and Leicestershire Authorities whilst allowing for an element of headroom for churn and choice within the market.</p>	
<p>North West Leicestershire District Council</p> <p>Tuesday 7th May, 2024</p>	<p>Policy 1: Spatial Strategy for Development with the Borough</p>	<p>New Homes</p> <p>North West Leicestershire District Council welcomes and supports your Council's intention to provide some 240 new homes per year through your new Local Plan. This figure comprises 188 dwellings to meet your standard method requirements and 52 homes to contribute to Leicester City's unmet need. This latter figure is agreed in the Leicester & Leicestershire Authorities - Statement of Common Ground relating to Housing and Employment Land Needs (June 2022).</p>	<p>Support welcomed.</p>

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		<p>We note that this commitment is 'subject to evidence' (1st paragraph, page 23). This version of the plan does not contain site allocations. Candidate sites are listed in Appendix 1 of the consultation document but detailed site assessments have not yet been completed. There is also further work to do on infrastructure requirements, including for transport.</p> <p>Any shortfall below the figure agreed in the SoCG would need to be explained and justified. NWL may object to a plan that provides for less than 240 dwellings/year if the Borough Council has not rigorously explored reasonable ways to achieve the full requirement within the borough. This would be necessary to demonstrate that the plan is 'positively prepared' (NPPF paragraph 35).</p> <p>New jobs The consultation document reports that there is a need for 4.1 Ha of employment land comprising 1.0 Ha B1 use (now Class E(g)) and 3.1 Ha for B2/B8 (small) use. There is 5 Ha with outline planning permission and 3.22Ha on existing allocated sites which the Council proposes to roll forward into the new plan. Together these will exceed the evidence requirements. NWL supports the approach of meeting your employment needs in full with a margin for flexibility.</p>	
<p>House Builders Federation</p> <p>Wednesday 15th May, 2024</p>	<p>Policy 2: Regeneration Schemes and Large Scale Change</p>	<p>This policy states that when large scale change of either 100 homes or more or 5 hectares or more is proposed the Council will require the production of a masterplan, development brief, design code, phasing plan and transport assessment.</p>	<p>The first paragraph of Policy 2 has been amended to read '<i>When large scale change of either 100 homes or more, 1,500 squares metres of floorspace or more, or of 5 hectares or more is proposed, to ensure that any cumulative impact is mitigated proportionately, the Council will require, at least, the production of a masterplan, development brief, design code and</i></p>

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		<p>The HBF considers that the Council may want to consider the wording of this proposed policy, is the Council suggesting that all of these documents need to be produced for every development of more than 100 homes or could it be one of these documents, or a mix of these documents and the HBF considers that it would be appropriate for this evidence to be proportionate to the scale of the development.</p> <p>The NPPF⁶ is also clear that Travel Plans are only required for developments that will generate significant amounts of movement, and therefore a transport assessment may not be required for every development that has 100 homes or more, if the transport generated is not significant. A Transport Statement may be more appropriate, and again the HBF would recommend that the Council considers the wording of the policy in relation to this to ensure it is in line with the NPPF, and that it is appropriately flexible and proportionate to the development.</p>	<p><i>phasing plan</i>'.</p> <p>Text refers to appropriate transport assessment, no change considered necessary.</p>
<p>Leicestershire County Council</p> <p>Wednesday 15th May, 2024</p>	<p>Policy 2: Regeneration Schemes and Large Scale Change</p>	<p>This comment should be read in conjunction with the overarching comments with regard to the role that this Plan needs to play in terms of pivoting to the delivery of Strategic Growth Plan spatial vision.</p> <p>Whilst growth in O&W will not be (in relative terms) of a strategic scale, certain locations have the potential to abut such in other districts (i.e. coming forward in the SGP Priority Growth Corridor in Harborough), and thus locations in O&W have the potential to act as a 'gateway' to the Corridor. The text and list needs to reflect the need</p>	<p>The Council has amended Policy wording to reflect sentiments relating to the Borough's growth options having the potential to adjoin or have a cross-boundary relationship with neighbouring Authority areas strategic development sites.</p>

⁶ NPPF December 2023 Paragraph 117

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>for cross-boundary coordination, masterplanning and assessment (including in respect of transport) as might be necessary.</p> <p>Further to this, the importance of ‘permeability’ through the borough to enable communities in Oadby and Wigston Borough, Harborough District and Blaby District to access key services in the City (ie. Leicester Royal Infirmary (A&E), Leicester General and the Glenfield Hospital), the City Centre (for retail, cultural and leisure) and employment locations (City Centre in addition to employment sites, including large employment sites beyond the borough eg Troon Way in the north-east of the City). Strategic movements within, and cross boundary movements into and across the borough with the City and Harborough and Blaby Districts, are crucial.</p> <p>It is suggested that there is reference to the potential requirement for proposals to submit a Health Impact Assessment (HIA) screening statement.</p> <p>Minerals and waste safeguarding is an important consideration in the determination of any large-scale proposals of this nature.</p>	
<p>House Builders Federation</p> <p>Wednesday 15th May, 2024</p>	<p>Policy 3: Infrastructure and Developer Contributions</p>	<p>This policy states that developer contributions secured from new development will be used by the Council to deliver the infrastructure required to facilitate sustainable growth. It goes on to state that the Council will only consider any variation to the requirements set out in this policy in exceptional circumstances, and in such cases, it must be robustly demonstrated to the Council by the applicant that this would be unviable based on a PPG-</p>	<p>Noted.</p> <p>Alternate wording has not been put forward and therefore, the Council consider the current wording to be appropriate.</p> <p>The Council has prepared an Infrastructure Delivery Plan (IDP) and a Whole Plan Viability Assessment of the Plan.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>compliant developer funded viability assessment agreed with the Council (through an open book approach).</p> <p>The HBF considers that the Council should reflect on the wording of this policy, much of the proposed text appears to be a statement of intent rather than a policy. Development can only be required to mitigate its own impact and cannot be required to address existing deficiencies in infrastructure or services. It is therefore essential for the Infrastructure Development Plan (IDP) to clearly show the existing and known deficiencies in the current infrastructure, before reaching any conclusion on the cumulative effects of new development, and any contribution that is needed from new development to mitigate any additional individual and/or cumulative impacts.</p> <p>Without an up-to-date Viability Assessment the HBF is not able to comment on whether the text in relation to Exceptional Circumstances is appropriate. However, the HBF would generally recommend that a policy includes the opportunity for negotiation around policy requirements for site specific reasons, to reflect viability challenges identified in the Viability Assessment or to reflect changes in viability since the undertaking of the Viability Assessment.</p>	<p>As drafted, the Policy already allows for negotiation in the second clause of the 'exceptional circumstances' wording. No change required.</p>
<p>Leicestershire County Council</p> <p>Wednesday 15th May, 2024</p>	<p>Policy 3: Infrastructure and Developer Contributions</p>	<p>The reference in the supporting text to cross-boundary contributions and liaison with Leicestershire County Council over impact upon infrastructure within the Borough is welcomed.</p> <p>The supporting text and policy wording needs to be made more inclusive in transport terms, i.e. to embrace not just</p>	<p>Support welcomed.</p> <p>The list at paragraph 4.6.4 has been updated to explicitly include reference to walking, cycling and wheeling.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>physical infrastructure but revenue measures (e.g. travel educational and promotional activities), too. Achieving greater levels of sustainable and active travel is reliant on a combination of infrastructure and revenue based activities.</p> <p>Reflecting the overarching comments, opportunities should be explored to embed in the supporting text and policy references to the South of Leicester Local Cycling and Walking Infrastructure Plan and SELTS.</p> <p>The list at paragraph 4.6.4 should explicitly include reference to walking, cycling and wheeling.</p> <p>Paragraph 4.6.5 should also include the reference for the IDP potentially needing to evolve to encompass measures and infrastructure required in the Borough to support and enable growth across a wider area, including in the SGP Priority Growth Corridor and vice-versa.</p> <p>Logically, the Cross Boundary Contributions section should appear higher up in this chapter.</p> <p>We would welcome the opportunity to discuss widening the scope of the third paragraph of the policy to talk also about infrastructure / measures that improve transport connectivity to promote health improvements and tackle climate change.</p> <p>The policy paragraph in respect of cross-boundary impacts is weaker than the relevant section of the supporting text (our highlighting), i.e. (policy) <i>“Developments occurring within the Borough (or within neighbouring local authorities) which have cross boundary</i></p>	<p>Greater emphasis on the need for strategic planning and infrastructure are incorporated, however, references to the role of the Strategic Growth Plan, and specific evidence relating to Transport, are incorporated in Policy 1 and introductory chapters of this Plan.</p> <p>Paragraph 4.6.5 has been updated to include reference for the Infrastructure Delivery Plan to potentially evolve in order to encompass measures and infrastructure required in the Borough to support and enable growth across a wider area, including in its role of delivering strategic infrastructure.</p> <p>The third paragraph of the Policy has been amended to reflect comments.</p> <p>Paragraph 4.6.20 has been amended to read ‘... developments occurring within the Borough (or within neighbouring local authorities) which have cross-boundary impacts development that has an impact upon infrastructure within the Borough may will be required to contribute towards the provision of and / or make financial contributions towards necessary mitigation measures to accommodate that additional demand’.</p> <p>The Exceptional Circumstances Section will be applied consistently throughout the Plan.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p><i>impacts will be taken into account when developer contributions are being negotiated and agreed”. Vs. (para 4.6.20) “...development that has an impact upon infrastructure within the Borough will be required to contribute towards the provision of and / or financial contribution towards necessary mitigation measures to accommodate that additional demand”</i></p> <p>The Exceptional Circumstances section seems to be an unusual inclusion in a Local Plan policy, and it's not consistently applied to all policies throughout the Plan.</p>	
<p>NHS Property Services</p> <p>Friday 3rd May, 2024</p>	<p>Policy 3: Infrastructure and Developer Contributions</p>	<p>Draft Policy 3 sets out the overarching policy for ensuring development makes a positive contribution to sustainable growth through the delivery of appropriate infrastructure in a timely manner. NHSPS welcomes the recognition of health infrastructure as essential infrastructure, with an expectation that development proposals will make provision to meet the cost of healthcare infrastructure made necessary by the development.</p> <p>In areas of significant housing growth, appropriate funding must be consistently leveraged through developer contributions for health and care services to mitigate the direct impact of growing demand from new housing.</p> <p>Additionally, the significant cumulative impact of smaller housing growth and the need for mitigation must also be considered by the Plan.</p> <p>We also emphasise the importance of effective implementation mechanisms so that healthcare infrastructure is delivered alongside new development, especially for primary healthcare services as these are the</p>	<p>The Council and the LLR ICB meet quarterly to discuss all relevant matters and will continue to do so.</p> <p>The Council has prepared an Infrastructure Delivery Plan (IDP) and is updating its Developer Contributions Supplementary Planning Document. The Council will take this representation into account and engage with the Leicester, Leicestershire and Rutland Integrated Care Board (ICB) and NHS Property Services as part of its work on these two aspects of the evidence to inform the Regulation 19 Pre-Submission Draft Plan.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>most directly impacted by population growth associated with new development.</p> <p>The NHS, Council and other partners must work together to forecast the health infrastructure and related delivery costs required to support the projected growth and development across the Local Plan area. NHSPS recommend that the Local Plan have a specific section in the document that sets out the process to determine the appropriate form of developer contributions to health infrastructure. This would ensure that the assessment of existing healthcare infrastructure is robust, and that mitigation options secured align with NHS requirements.</p> <p>The Local Plan should emphasise that the NHS and its partners will need to work with the Council in the formulation of appropriate mitigation measures. NHSPS recommends that the Council engage with the relevant Integrated Care Board (ICB) to add further detail within the Local Plan and supporting evidence base (Infrastructure Delivery Plan) regarding the process for determining the appropriate form of contribution towards the provision of healthcare infrastructure where this is justified.</p> <p>As a starting point, we suggest the following process:</p> <ul style="list-style-type: none"> • Assess the level and type of demand generated by the proposal. • Work with the ICB to understand the capacity of existing healthcare infrastructure and the likely impact of the proposals on healthcare infrastructure capacity in the locality. 	

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<ul style="list-style-type: none"> • Identify appropriate options to increase capacity to accommodate the additional service requirements and the associated capital costs of delivery. • Identify the appropriate form of developer contributions. <p>Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development. Where new development creates a demand for health services that cannot be supported by incremental extension or internal modification of existing facilities, this means the provision of new purpose-built healthcare infrastructure will be required to provide sustainable health services.</p> <p>Options should enable financial contributions, new-on-site healthcare infrastructure, free land/infrastructure/property, or a combination of these.</p> <p>It should be emphasised that the NHS and its partners will need to work with the Council in the formulation of appropriate mitigation measures.</p>	
Oadby Civic Society 13.05	Policy 3: Infrastructure and Developer Contributions	<p>Comment.</p> <p>Oadby Civic Society would urge the Council to not only assess Developer Contributions on major developments but to also carry out detailed assessments of the feasibility for the necessary support facilities to be actually provided including schools, retail and medical care, a duty which we understand the Council is beholden to carry out.</p> <p>It should be noted that many Primary Schools are rapidly having to build on their external spaces in order to provide</p>	Council relies on advice from county council and integrated care board on the feasibility of expansion.

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>additional classrooms; this is not compatible with healthy lifestyles.</p> <p>For these reasons Oadby Civic Society has responded on the advantages of placing residential development on Option Sites OAD/006 and OAD/015.</p>	

Chapter 5 – Combating Climate Change (Policies 4, 5, 6, 7, and 8)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Leicestershire County Council Wednesday 15 th May, 2024	Policy 4: Sustainable Development	Minerals and waste safeguarding is an important consideration in making sure that development is sustainable and does not impact on the ability of communities to meet their future needs for minerals or for waste management development. As a minor editorial point, the first part of paragraph 5.2.3 doesn't read very well.	An additional bullet has been added to Paragraph 5.2.2 to read: <i>'- safeguarding minerals and reusing waste'</i> . Paragraph 5.2.3 has been amended to read <i>'In order for the Government to realise its commitment of becoming a net zero targets emitter, carbon emissions must be minimised. In order to do this, each local community needs to help and play its part'</i> .
NHS Property Services Friday 3rd May, 2024	Policy 4: Sustainable Development	Draft Policy 4 seeks that all development proposals in the Borough must contribute to the achievement of sustainable development. NHSPS fully support policies that promote carbon neutral development, and the securing of financial contributions where on-site carbon mitigation requirements cannot be met. In considering the implementation of policies related to net zero, we would highlight that NHS property could benefit from carbon offset funds. This would support the NHS to reach the goal of becoming the world's first net zero healthcare provider.	Support welcomed.
Environment Agency Thursday 20th	Policy 5: Climate Change	We welcome the inclusion of this section and the commentary provided within it. Role of the Local Plan	Support welcomed.

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
June, 2024		<p>We are pleased to see that the various ways in which the Local Plan can assist in addressing the impacts of climate change has been recognised.</p> <p>Policy text</p> <p>We welcome the wording of the policy. It can be a good idea to divide the policy wording into sections, in this case 3. Whilst we support all the bullet points throughout the policy there is one instance where it is not immediately clear why the point has been put under the heading it has – this is the inclusion of biodiversity net gain under ‘Maximising carbon sequestration’.</p>	
<p>House Builders Federation</p> <p>Wednesday 15th May, 2024</p>	Policy 5: Climate Change	<p>This proposed policy states that development proposals are expected to reduce the amount of energy used in construction and operation of buildings and improve energy efficiency to contribute to achieving net zero.</p> <p>The HBF supports the Council in seeking to reduce the amount of energy used and to improve energy efficiency. However, the HBF considers that the Council should ensure that this policy is only implemented in line with the December 2023 Written Ministerial Statement which states that ‘a further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise.</p> <p>Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes’.</p>	<p>Support welcomed.</p> <p>Policy wording does not advocate going beyond building regulations standards. Further reference to the latest building regulations included to reiterate this.</p> <p>Reference to BNG has been removed from the Policy.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>It goes on to state that ‘the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale.</p> <p>Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale’.</p> <p>The HBF considers as such it would be appropriate to make reference to the Future Homes Standard and the Building Regulations as the appropriate standards for development. The Council will also be aware that the Future Homes and Buildings Standards: 2023 consultation has been undertaken covering Part L (conservation of fuel and power), Part F (ventilation) and Part O (overheating).</p> <p>It goes on to state that development must incorporate green infrastructure into the public realm and must achieve an overall net gain for biodiversity commensurate with the scale of the development.</p> <p>The HBF is concerned about the need to incorporate green infrastructure into the public realm, and consider that the Council may want to include more flexibility in this policy around the location of the green infrastructure.</p>	

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>The HBF is also concerned around the inclusion of policy text around biodiversity net gain. The HBF considers that there is potential for confusion and contradiction here, and the HBF considers that this element of the policy should be removed. BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Therefore, developers must deliver a biodiversity net gain of 10%, there is no need for further policy in relation to an overall net gain in biodiversity commensurate with the scale of the development.</p> <p>The PPG is clear that there is no need for individual Local Plans to repeat national BNG guidance. It is HBF's opinion that the Council should not deviate from the Government's requirement for 10% biodiversity net gain as set out in the Environment Act.</p> <p>The policy also states that development must be designed to adapt to and mitigate the impacts of climate change and reduce vulnerability, particularly in terms of overheating, flood risk and water supply.</p> <p>The HBF considers that the Council may need to provide more detail as to how this will be determined in order for more detailed comments to be provided. But for example, the HBF would suggest that as there is already building regulations in relation to overheating it is not necessary for this to be considered within planning policy for an individual dwelling, although there may be potential for it to be a consideration in relation to the potential layout of the development.</p>	

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<p>Leicestershire County Council</p> <p>Wednesday 15th May, 2024</p>	<p>Policy 5: Climate Change</p>	<p>It is suggested that this section of the Plan should include reference to the Government’s Transport Decarbonisation Plan.</p> <p>As an editorial point, the end of paragraph 5.4.1 doesn’t reflect the generally accepted evidence on climate change, i.e. it should read “...<i>temperatures could will continue to rise...</i>”.</p> <p>The list at paragraph 5.4.9 could also include reference to the provision of EV charging.</p> <p>With regard to the policy wording in respect of maximising carbon sequestration, the County Council has been undertaking a piece of work in respect of ‘Value of Trees’ and the opportunity would be welcomed to explore whether it might be appropriate to reference that work in either the policy or the policy’s supporting text.</p> <p>We welcome the mention of the circular economy and using our resources better, recycling and reducing waste and the waste hierarchy. There could perhaps also be a recognition here that minerals sites restoration can play a part in climate change mitigation, including carbon storage and flood mitigation.</p> <p>We suggest the following changes to the text, highlight in bold and underlined:</p> <ul style="list-style-type: none"> • 5.4.9 Climate change strategy referenced ‘<i>Resources and Waste – support action to move towards a more circular economy by using our resources more efficiently better, recycling and reducing waste; preventing, reducing, reuse and recycling waste;</i>’ 	<p>Paragraph 5.4.7 (under International / National Response) now includes reference to the Government’s Transport Decarbonisation Plan.</p> <p>The last sentence in paragraph 5.4.1 has been amended to read ‘<i>Unless greenhouse gas emissions are vastly reduced, temperatures will could continue to rise globally</i>’.</p> <p>Bullet 2 under 5.4.9 has been amended to incorporate the role that EV Charging can play.</p> <p>Paragraph 5.4.9 has been amended as recommended. It will read ‘<i>Resources and Waste – support action to move towards a more circular economy by using our resources better, recycling, reusing and reducing waste</i>’;</p> <p>Policy 5, bullet 4, has been amended to read ‘<i>Development must follow the waste hierarchy to prevent, minimise, reuse, and recycle waste during the construction phase and to encourage greater levels of recovery and recycling over the lifetime of the development.</i>’</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<ul style="list-style-type: none"> • Policy 5: Climate Change (Strategic) ...<i>‘Development must follow the waste hierarchy to prevent, minimise, reuse, and recycle waste during the construction phase and to encourage greater levels of recovery and recycling over the lifetime of the development.’</i> 	
<p>McCarthy and Stone</p> <p>Tuesday 14th May, 2024</p>	<p>Policy 5: Climate Change</p>	<p>Comment.</p> <p>Whilst we support the Council’s aim to reduce the amount of energy used and to improve energy efficiency, the Council should ensure that any requirement is ‘stepped’ in line with Government targets and the proposed changes to the building regulations.</p> <p>This approach is confirmed and would be consistent with within the Ministerial Statement (statement no : Statement UIN HCWS123 available from Written statements - Written questions, answers and statements - UK Parliament) released on 13th December 2023. The ministerial statement confirms that with respect to the net zero goal....</p> <p><i>‘The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government’s commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose</i></p>	<p>Policy wording does not advocate going beyond building regulations standards.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p><i>local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale’ and ‘To be sound, local plans must be consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, including this one’.</i></p>	
Natural England 09.05	Policy 5: Climate Change	<p>Support.</p> <p>Natural England supports this policy and is pleased to note that nature-based solutions are mentioned within the policy wording under the heading Maximising carbon sequestration, and also within the explanatory text. We also acknowledge that climate change features throughout the Plan as it is interlinked with many policy areas including biodiversity recovery, green infrastructure, health and flooding.</p>	Support welcomed.
Environment Agency 20.06	Policy 6	<p>We welcome the inclusion of this section and the commentary provided within it.</p> <p>Policy text We welcome the wording of the policy. We would however recommend that a 5th bullet point is added to the list of mitigation and adaptation measures which the FRA must identify:</p> <p>Where possible, how the development will lead to an overall reduction in flood risk elsewhere.</p>	<p>Support welcomed.</p> <p>The 4th bullet in the Policy has been amended to state:</p> <p><i>‘The localised and cumulative risk of flooding can be fully mitigated through careful design and engineering methods including (but not limited to) natural flood risk or other on-site flood management infrastructure leading to an overall reduction of flood risk elsewhere’.</i></p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
HBF 15.05	Policy 6: Flood Risk and Sustainable Water Management	<p>This policy states that all development must be able to robustly demonstrate that water is readily available to support the proposed scale of growth, and that clear management arrangements and funding for ongoing maintenance of water availability and quality over the lifetime of the development is known.</p> <p>The HBF opposes the requirement for applicants to assess or demonstrate the capacity of the water company to connect a development with water services (e.g. the supply of fresh water and the treatment of wastewater).</p> <p>HBF also rejects the requirement for applicants to demonstrate water neutrality, as the legal responsibility for the supply of water services falls to the water company.</p> <p>These are not land use planning matters. They are matters managed under a separate statutory regime. Matters relating to water and sewerage infrastructure and its availability and/or network capacity are both controlled by separate, dedicated legislation, i.e., s37 (water) and s94 (sewerage) of the Water Industry Act 1991. Second, the planning process should not be used as a route to subjugate established primary legislation.</p> <p>The ability of the water companies to support the development requirements of the Local Plan is, however, a legitimate matter for the local authority to assess as part of preparing the local plan. The local authority is required to do so through the preparation of the evidence to support the local plan, including a statutory Sustainability Appraisal and an Infrastructure Delivery Plan. The purpose of this preparatory work is to ensure that the local</p>	Policy amended to delete reference to water quality but developments can help with management.

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>plan is deliverable by taking into account constraints, such as those defined in NPPF⁷.</p> <p>As competent authorities, water companies, are told under the Water Industry Strategic Environmental Requirements technical document (WISER) that, in order to comply with their obligations under the Habitats Regulations, they must take account of predicted growth in housing development in their business plans and maintain and upgrade their wastewater systems in that light. As statutory consultees to the local plan process, water companies have more than sufficient time to predict, plan and provide the requisite infrastructure.</p> <p>Housebuilders are required contribute financially towards the construction of infrastructure for water services through the payment of connection charges to water companies. There is no need for a Local Plan to put any further requirements on to the developer in relation to water management.</p>	
Leicestershire CC 15.05	Policy 6: Flood Risk and Sustainable Water Management	<p>Reference to following the guidance from Leicestershire County Council in its role as the Lead Local Flood Authority, is welcomed.</p> <p>There are no particular comments on the flood risk/drainage elements of Policy 6. It is goes some way to strengthen national policy and steer developers towards LLFA engagement.</p> <p>Minerals sites through their restoration can play an important role in combatting climate change (which also</p>	Support welcomed.

⁷ NPPF Dec 2023 Paragraph 20(b)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		could include flood storage) and this policy can acknowledge the role of the District in helping wider schemes. This links to both the Climate Emergency and strategic green infrastructure ideas.	
Environment Agency 20.06	Policy 7	<p>We welcome the inclusion of this section and the commentary provided within it.</p> <p>In accordance with our position statement J4 in "The Environment Agency's approach to groundwater protection", we help planning authorities and local communities understand the problem of groundwater pollution from land contamination. We encourage them to acknowledge the need to reduce and manage groundwater pollution as part of sustainable development in their strategies and plans.</p> <p>We note the references made to 1) addressing existing sources of contamination (Policy 6, above) and 2) preventing new pollution (Policy 7). We support this wording, and which align with the principles set out in NPPF paragraphs 180 and 189 which we regularly reference when being consulted on development proposals on brownfield sites.</p> <p>We only have one recommended change be made to reflect the wording of the Policy text:</p> <p>5.8.1 "... Pollution can come from many sources, including light, noise, air, land, water, odour and vibrations, all of which can have a damaging effect on the local environment, amenities and health and wellbeing of residents and visitors."</p>	Change to 5.8.1 has been included.

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Leicestershire CC 15.05	Policy 7: Preventing Pollution	<p>We welcome that the proposed policy seems to encompass the NPPF 'agent of change' principle and that this will help to ensure that the continued use or expansion of extant minerals and waste sites are not prejudiced by the introduction of sensitive uses in the vicinity, however it is noted that the policy as currently drafted does not encompass air quality.</p>	<p>Noted.</p> <p>Reference to 'air quality' has been incorporate into Policy 7.</p>
Environment Agency 20.06	Policy 8: Renewable and Low Carbon Energy	<p>We welcome the inclusion of this section.</p> <p>While the Environment Agency do not favour particular renewable schemes over others, we are supportive of technologies and approaches that:</p> <ul style="list-style-type: none"> ● consider environmental risks early and comprehensively. ● minimise the impacts and risks to people and our environment – air, land, and water; and, ● are fit for the future, including resilience to the impacts of climate change. 	<p>Support welcomed.</p>
HBF 15.05	Policy 8: Renewable and Low Carbon Energy	<p>This policy states that all new homes must incorporate renewable and low carbon energy production equipment into its building fabric to meet at least 10% of the predicted total annual energy requirements of the building and its occupants.</p> <p>The HBF considers that this requirement is unnecessary and should be deleted. The HBF recognises that there may be potential for renewable energy generation on-site, however, it may be more sustainable and efficient to use larger scale sources rather than small-scale, it is also noted this policy also takes no account of the fact that over time energy supply from the national grid will be</p>	<p>Policy allows for non-compliance in exceptional circumstances and encourages renewable schemes which can then feed into the energy grid.</p>

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		decarbonised.	
Leicestershire CC 15.05	Policy 8: Renewable and Low Carbon Energy	<p>Whilst the Borough's restricted land availability probably renders it unlikely that any larger scale renewable energy sites are likely to come forward, nevertheless it might be worth considering inclusion of reference to suitability of access for installation of and possible future upscaling of equipment in the policy criteria list.</p> <p>There is an obvious opportunity here for waste developments to contribute to renewable energy production which can be included in the supporting text to the policy. This could explain that where appropriate and feasible there may be opportunity for decentralised energy development where it could be supplied by a major producer of heat/energy/steam such as a waste site.</p>	Noted.

Chapter 6 – Housing (Policies 9, 10, 11, 12, and 13)

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Oadby Civic Society 13.05	Policy 10	<p>Support.</p> <p>Oadby Civic Society supports the policy as written with the target densities as set out in the document.</p> <p>Maintaining these densities will enable the Borough to achieve its target housing expansion with minimum land uptake, thereby preserving the maximum open space and countryside for healthy lifestyles, climate change and biodiversity.</p>	Support welcomed.
NHS Property Services 03.05	Policy 9	<p>In undertaking further work on local housing needs, we suggest the Council consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff.</p> <p>Housing affordability and availability can play a significant role in determining people’s choices about where they work, and even the career paths they choose to follow. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have</p>	Access to affordable housing is a function of income, not profession.

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		<p>access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services. We recommend that the Council:</p> <ul style="list-style-type: none"> • Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners. • Ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments, and any other relevant evidence base studies that inform the local plan (for example employment or other economic policies). • Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers. 	
McCarthy Stone 14.05	Policy 9	<p>We note that the preferred options seeks a variable affordable housing requirement of between 10% and 30% depending on the location of the proposal. We also note that the consultation has been published without the supporting evidence of an up-to-date viability study and that this is confirmed in paragraphs 4.6.9 and 4.6.10 of the preferred options Local Plan. It is therefore difficult to ascertain if any of the options put forward are <u>realistic or deliverable</u>.</p> <p>Although we appreciate this consultation is a relatively early stage of plan production, we advise that by limiting scrutiny of the Local Plan Viability Assessment the Council is reducing the opportunities for comment on a crucial element of the evidence base that will inform policy and</p>	The Council has undertaken a Whole Plan Viability Assessment as part of the suite of evidence to support its Pre-Submission Plan. The Council is satisfied that its proposed position is justified.

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		<p>deliverability directly and the Local Plan would be less robust as a consequence.</p> <p>The Council will be aware of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that “<i>The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan</i>” (Paragraph: 002 Reference ID: 10-002-20190509). The evidence underpinning the council’s policy requirements should therefore be robust and be used to form deliverable and realistic policies.</p> <p>In addition, the viability of specialist older persons’ housing is more finely balanced than ‘general needs’ housing and we are strongly of the view that the older person’s housing typologies should be robustly assessed separately in the forthcoming Local Plan Viability Assessment that still needs to be undertaken to inform the plan. This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that: “<i>A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period.</i> If this is not done, the delivery of much needed specialist housing for older people may be significantly delayed with protracted discussion about other policy areas such as affordable housing policy requirements which are wholly inappropriate when considering such housing need.</p>	

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		<p>We would direct the Council towards the Retirement Housing Consortium paper entitled 'A briefing note on viability' prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2016 ('RHG Briefing Note') available from https://retirementhousinggroup.com/rhg/wp-content/uploads/2017/01/CIL-viability-appraisal-issues-RHG-February-2016.pdf. The RHG Briefing Note establishes how sheltered housing and extra care development differs from mainstream housing and looks at the key variables and assumptions that can affect the viability of specialist housing for older people. These key variables include unit size, unit numbers and GIA, non-saleable communal space, empty property costs, external build cost, sales values, build costs, marketing costs and sales periods and significantly variable benchmark land values. We are also aware and that the RHG Briefing Note is being updated and indeed we are informing that process. This update is needed given the changed circumstances since 2016.</p> <p>In presenting this submission, it is also relevant to note that McCarthy Stone which has traditionally developed retirement housing schemes for the middle market where it has proved more viable to do so, is, through its new "Evolve" housing concept better able to develop in lower value areas, where the market and planning conditions are right, thereby addressing a housing need for older people who have until now, not had this beneficial housing option available to them. The first of these schemes is now underway at Failsworth, Oldham.</p>	

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		<p>The council must therefore ensure that an up to date viability assessment is undertaken to inform the future plan. The new viability assessment must include a number of typologies that includes older person's housing and if older person's housing is found to be not viable an exemption must be provided within the plan in order to prevent protracted conversations at the application stage over affordable housing provision.</p>	
<p>McCarthy Stone 14.05</p>	<p>Policy 12</p>	<p>Object.</p> <p>Policy 12 Housing choices aims to deliver a mix of dwelling types, tenures and sizes that meets identified needs. With respect to specialist housing for older people it appears to want to achieve this via providing <i>'flexible, vibrant, socially inclusive and adaptable accommodation choices to help meet the diverse needs of the existing and future community, as well as to be able to respond to the changing needs of occupants over time'</i></p> <p>Government's policy, as set out in the revised NPPF, is to boost significantly, the supply of housing. Paragraph 60 reads:</p> <p><i>"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."</i></p> <p>The revised NPPF looks at delivering a sufficient supply of homes, Paragraph 63 identifies within this context, that the size, and type and tenure of housing needed for different groups in the community should be assessed and</p>	<p>Policy wording allows and encourages a mix of specialist housing types meeting specific evidenced need.</p>

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		<p>reflected in planning policies including older people. This now includes those who require retirement housing, housing-with-care and care homes.</p> <p>In June 2019 the PPG was updated to include a section on Housing for Older and Disabled People, recognising the need to provide housing for older people. Paragraph 001 Reference ID: 63-001-20190626 states:</p> <p><i>“The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking”</i> (emphasis added).</p> <p>Paragraph 003 Reference ID: 63-003-20190626 recognises that:</p> <p><i>“the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support.”</i></p> <p>Thus, a range of provision needs to be planned for. Paragraph 006 Reference ID: 63-006-20190626 sets out:</p>	

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		<p><i>“plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require.”</i></p> <p>Therefore, the Local Plan should recognise that housing for older people has its own requirements and cannot be successfully considered against criteria for adaptable and accessible general family housing.</p> <p><u>Need for Housing for Older People</u> It is well documented that the UK has an ageing population. Life expectancy is greater than it used to be and as set out above by 2032 the number of people in the UK aged over 80 is set to increase from 3.2 million to 5 million (ONS mid 2018 population estimates).</p> <p>It is generally recognised (for example, within the Homes for Later Living Report September 2019). That there is a need to deliver <u>30,000 retirement and extra care houses a year</u> in the UK to keep pace with demand.</p> <p>The age profile of Oadby and Wigston can be drawn from the 2018 population projections from the Office for National Statistics. This advises that there were 12,264 persons aged 65 and over in 2018, accounting for 21.5% of the total population of the Council area. This age range is projected to increase by 2,989 individuals, or 24.4%, to 15,253 between 2018 and 2043. The population aged 65 and over is expected to increase to account for 24.6% of the total population of the Borough by 2043.</p>	

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		<p>In 2018 there were 3,993 persons aged 80 and over, individuals who are more likely to be frail and in need of long-term assistance. The number of people in this age range is forecasted to increase by 2,110 individuals, or 52.8%, to 6,103 between 2018 and 2043. The population aged 80 and over is anticipated to represent a higher proportion of Oadby and Wigston's residents, accounting for 7.0 % of the total population in 2018 and increasing to 9.8% by 2043.</p> <p>The Plan is supported by the Housing and Economic Needs Assessment entitled 'Leicester and Leicestershire Housing and Economic Needs Assessment, Final report, Icen, April 2022'. This identifies at table 11.21 the specialist older persons housing need for the Borough to 2041. This identifies that 661 units of housing with support and 389 of housing with care are needed to 2041, the majority of these in the market sector rather than the affordable sector.</p> <p>It is therefore clear there will be a significant increase in older people and the provision of suitable housing and care to meet the needs of this demographic rather than purely just adaptable homes should be a priority of the emerging Local Plan.</p> <p><u>Benefits of Housing for Older People</u></p> <p>Older Persons' Housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can</p>	

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		<p>all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources.</p> <p><u>Economic</u> A report “‘<i>Healthier and Happier’ An analysis of the fiscal and wellbeing benefits of building more homes for later living”</i> by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. The analysis showed that:</p> <ul style="list-style-type: none"> • ‘Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year. • Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year. • On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.’ <p>A further report entitled <i>Silver Saviours for the High Street. How new retirement properties create more local economic value and more local jobs than any other type of residential housing</i> (February 2021) found that retirement properties create more local economic value and more local jobs than any other type of residential development. For an average 45 unit retirement scheme, the residents generate £550,000 of spending a year, £347,000 of which</p>	

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		<p>is spent on the high street, directly contributing to keeping local shops open.</p> <p>As recognised by the PPG, Retirement housing releases under-occupied family housing and plays a very important role in recycling of housing stock in general. There is a 'knock-on' effect in terms of the whole housing chain enabling more effective use of existing housing. In the absence of choice, older people will stay put in properties that are often unsuitable for them until such a time as they need expensive residential care. A further Report "<i>Chain Reaction</i>" <i>The positive impact of specialist retirement housing on the generational divide and first-time buyers (Aug 2020)</i>" reveals that about two in every three retirement properties built, releases a home suitable for a first-time buyer. A typical Homes for Later Living development which consists of 40 apartments therefore results in at least 27 first time buyer properties being released onto the market.</p> <p><u>Social</u> Retirement housing gives rise to many social benefits:</p> <ul style="list-style-type: none"> • Specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack in adaptations such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder • Retirement housing helps to reduce anxieties and worries experienced by many older people living in housing which does not best suit their needs by 	

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		<p>providing safety, security and reducing management and maintenance concerns.</p> <ul style="list-style-type: none"> The Housing for Later Living Report (2019) shows that on a selection of wellbeing criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing into housing specifically designed for later living. <p><u>Environmental</u> The proposal provides a number of key environmental benefits by:</p> <ul style="list-style-type: none"> Making more efficient use of land thereby reducing the need to use limited land resources for housing. Providing housing in close proximity to services and shops which can be easily accessed on foot thereby reducing the need for travel by means which consume energy and create emissions. Providing shared facilities for a large number of residents in a single building which makes more efficient use of material and energy resources. <p><u>Recommendations</u> The 2018 population projections from the Office for National Statistics shows a large increase in the population over the age of 65. For this reason and the requirements of the PPG, the Council should ensure specialist housing to meet the needs of older people, including sheltered housing (retirement living), extra care housing and care homes are addressed and that older person's housing is not confused with wheelchair accessible housing, Lifetime Homes or other specialised housing.</p>	

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		<p>The best approach towards meeting the diverse housing needs of older people is for the plan to:</p> <ul style="list-style-type: none"> • Identify the older person’s housing need. • Allocate specific sites to meet the needs of older people that are in the most sustainable locations close to key services. • Include a standalone policy actively supporting the delivery of specialist older people’s housing with good access to services and facilities for older people. <p>Developers of older person’s housing schemes should not be required to demonstrate need given the significant need identified and the many benefits that such developments bring and if a quantum is specified this should be regarded as a target and not a ceiling. Given also that such developments “help reduce costs to the social care and health systems” (PPG refers), requirements to assess impact on healthcare services and/or make contributions should be avoided.</p> <p>While we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided that, we hope, will provide a useful reference for the Council:</p> <p><i>“The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations.</i></p> <p><i>The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances by providing appropriate housing choice, particularly retirement</i></p>	

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		<p><i>housing and Extra Care Housing/Housing with Care. The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities.”</i></p>	
Leicestershire CC 15.05	Policy 9	<p>It is noted that the Housing and Economic Needs Assessment (HENA) referenced as evidence for the need for affordable housing, covers the period to 2036, whereas the new Plan is intended to run 2041. Required provision is likely to be increased in this 5 year period.</p> <p>From an LCC Landowner perspective</p> <p>I would support the “exceptional circumstances” provisions in Policy 9 – Affordable Housing</p>	HENA provides an annual need figure that will be used unless/until superceded by more up to date information,
Leicestershire CC 15.05	Policy 11	<p>Para 6.6.4 <i>Oadby and Wigston will continue to have a zero need for both permanent sites and transit pitches -</i></p> <p>Whilst the need for permanent pitches has always been low (due to the difficulty in identifying families living in the area and the lack of existing pitches) the need for Transit sites is different.</p> <p>It could be argued that there is not an authority anywhere in England that does not require access to Transit pitches. What it should say is that whilst there is evidence of transient families moving through the area or visiting relatives that would require access to transit pitches, that these pitches need not necessarily be developed in Oadby and Wigston, there are opportunities for Oadby and Wigston to contribute towards countywide provision of Transit pitches which would enable all the planning authorities in Leicestershire share one or a number of Transit sites/pitches.</p>	Paragraph 6.6.4 amended to reflect sentiment of suggested change.

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		<p>We would suggest rewording this paragraph to reflect this, by saying <i>It is expected that the borough of Oadby and Wigston will continue to have a zero identified need for both permanent sites and although there is a very limited need for transit pitches the authority will continue to support a county wide approach to Transit provision that could accommodate any families wishing to visit the area.</i></p> <p>Minerals and waste safeguarding is also important in this case to ensure that sensitive uses (GRT sites) are not introduced into the vicinity of the existing minerals or waste sites. This could cause amenity issues for residents of the new sites or complaints arising should applications be made to intensify activity at the existing minerals and waste sites.</p> <p>The development of a site in a mineral safeguarding area could also sterilise the mineral resource beneath or adjacent to the site and would therefore be contrary to Policy M11 of the LMWLP without a Mineral Assessment.</p> <p>This should therefore form a consideration in the assessment of suitable sites.</p>	
Leicestershire CC 15.05	Policy 12	<p>As on observation, with regard to paragraph 6.8.10, it seems a bit odd for the draft Plan to get to page 56 before presenting what is quite a significant piece of evidence about the Borough's age profile and for this not to be reflected in the Plan's objectives.</p> <p>In respect of the draft policy wording:</p>	<p>Census data on age of population in Section 2 pg 12.</p> <p>Paragraph 6.8.17 and Policy 12 updated to include reference to the value of locating new specialist housing near to LTN/120 compliant infrastructure.</p> <p>Self and Custom Housebuilding is supported in this Policy, although not required. Therefore, no change</p>

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		<p>it is suggested that the identification of sites to cater for older people's housing needs should have regards to 'proximity to existing and proposed LTN 1/20 compliant cycle/wheeling infrastructure', on the basis that such infrastructure would serve modes of travel aimed at older people with limited mobility (mobility scooters etc.) - i.e. the 'wheeling' part of cycling and wheeling. Likewise, provision of older people's housing within larger sites would similarly benefit from being located in proximity to any onsite LTN 1/20 facilities that are to be provided.</p> <ul style="list-style-type: none"> • It is suggested that the location of affordable housing provision within sites should have regard to any existing or proposed active travel or passenger transport provision within or surrounding the site, given that affordable dwellings are less likely to have access to a private car than market housing and therefore will be more reliant on such modes to provide essential access to key jobs and services/facilities. <p>For those sites that are eligible to accommodate a proportion of dwellings that meet Part M4(3) of the building regulations, it is suggested that the policy stipulates the need for consideration of the location of such dwellings within the site for transport/accessibility purposes, namely:</p> <ul style="list-style-type: none"> - Proximity to existing/proposed passenger transport and/or LTN 1/20 compliant cycle infrastructure (on the basis that such infrastructure would serve modes of travel aimed at target occupants of such dwellings (mobility scooters etc. - i.e. the 'wheeling' part of cycling and wheeling). 	<p>needed.</p> <p>Support for the inclusion of M4(2) and M4(3) noted and welcomed.</p>

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		<ul style="list-style-type: none"> - Potentially grouping such dwellings together/in close proximity on the basis that occupants of such dwellings are more likely to have wider supported transport and/or social care needs – grouping together may have logistical/operational efficiency and carbon reduction benefits (e.g. potential to combine pick-ups/drop-offs for supported transport). • If significant quantities of custom/self-build plots are to be included as part of wider allocations/permitted development sites (as proposed through the draft policy), it will be important to ensure that this is taken into account in setting trigger points for infrastructure delivery and/or contributions – i.e. if reaching a trigger point is reliant on delivery of at least some self/custom build housing, there could be an increased risk that this will never happen? <p>Conversely exclusion of self/custom build housing from the setting of trigger points could mean a considerable number of new homes coming forward without the delivery of the necessary infrastructure/ contributions being triggered for the site as a whole.</p> <ul style="list-style-type: none"> • In the final paragraph of the section that talks about Retention of Existing Homes, the criteria relating to the conversion of dwellings into smaller units of self-contained accommodation should also include impacts on on-street parking. <p>It is considered that incorporating M4(2) and M4(3) standards into new developments can significantly enhance the accessibility and adaptability of housing</p>	

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		<p>stock, addressing the needs of a diverse and potentially aging population.</p> <p>Comments from a LCC Landowner perspective In relation to Self-Build I would expect to see a provision enabling units to revert back to market housing if no uptake in say a 6-12 month period.</p>	
Leicestershire CC 15.05	Policy 13	<p>In respect of the draft policy wording, in the first paragraph the criteria should also include impacts on on-street parking.</p> <p>The 'agent of change' principle is also important to ensure that where urban infill development takes place the proposals take account of any existing mineral or waste infrastructure in the vicinity and ensure that the infill development does not prejudice its continued use.</p>	Policy 13 updated to refer to ' <i>the consideration of on or off-street parking provision</i> '.
HBF 15.05	Policy 9	<p>This policy states that the Council requires the provision of affordable homes on all major developments, with Oadby providing 30% affordable housing, Wigston (including Kilby Bridge) providing 20% and South Wigston 10%. It goes on to state that the type, tenure and mix of affordable homes will be negotiated at the time of the proposal being determine. It also states that at least 10% of the total number of homes to be provided must be available for affordable home ownership and at least 25% of all affordable homes will be sought as First Homes.</p> <p>The HBF also notes that the LLHENA identifies an affordable housing need within Oadby and Wigston of 69 affordable home ownership dwellings per annum and 139 rented affordable dwellings per annum. The HBF supports</p>	Plan has been subject to whole plan viability testing.

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		<p>the need to address the affordable housing requirements of the borough. The NPPF is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability and deliverability. The Council should be mindful that it is unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery. As the Council has not provided a Viability Assessment during this consultation it is not possible for the HBF to comment on the soundness or suitability of this policy.</p>	
HBF 15.05	Policy 10	<p>This policy looks for development to be provided at a density of at least 50 dwellings per hectare (dph) where they are located within the town centre boundary of Wigston or the district centre boundaries of Oadby and South Wigston, and at a density of at least 40dph on sites that are located outside of the town centre boundary of Wigston and the district centre boundaries of Oadby and South Wigston.</p> <p>The HBF supports the efficient use of land and understands the inclusion of a density policy. The HBF considers that the inclusion of a level of flexibility to take account of site specific circumstances is appropriate.</p> <p>The HBF considers that it is important to ensure that the density requirements do not compromise the delivery of homes in sustainable locations to meet local needs. The Council will need to ensure that consideration is given to</p>	<p>Support welcomed.</p> <p>Policy offers flexibility to reflect individual site circumstances.</p>

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		<p>the full range of policy requirements as well as the density of development, this will include the provision of M4(2) and M4(3) standards, the NDSS, the provision of cycle and bin storage, the mix of homes provided, the availability of EV Charging and parking, any implications of design coding and the provision of tree-lined streets, tree replacement and canopy proportions, highways requirements, Biodiversity Net Gain, and Building Regulations requirements in relation to heating and energy and the Future Homes Standard.</p>	
HBF 15.05	Policy 12	<p>This policy states that the Council expects all applications for new residential development to contribute towards delivering a mix of dwelling types, tenures and sizes to meet the identified needs of the Borough. Table 2 within the policy sets out housing mix as identified in the LLHENA. The policy also states that the Council will support the development of bungalows, ground floor accommodation, specialist care accommodation, elderly care accommodation and retirement accommodation that meets an identified need and is proposed in appropriate sustainable locations.</p> <p><u>Requirements of Specific Groups</u></p> <p>The policy goes on to state that all new build homes will be expected to comply with M4(2) standards, and that all major residential development proposals to deliver 10% of market homes and 20% of affordable homes to comply with M4(3) standards.</p>	<p>Support welcomed.</p> <p>Council will be publishing evidence on local needs to justify the Policy approach.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG. The PPG identifies the type of evidence required to introduce a policy requiring the M4 standards, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Oadby and Wigston which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommends that an appropriate transition period is included within the policy.</p> <p>The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances, and the ability to provide step-free access. If the policy is to be retained it will need to be amended to include these considerations.</p> <p>The Council should also note that the Government response to the Raising accessibility standards for new homes states that the Government proposes to mandate</p>	

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. M4(3) would continue to apply as now where there is a local planning policy is in place and where a need has been identified and evidenced.</p> <p>The Council should also be aware that Part M Building Regulations Standard M4(3) Category 3: Wheelchair User Dwellings (or equivalent replacement standards) can be split into two different provisions. M4(3)(2a) where provision made must be sufficient to allow simple adaptation of the dwellings to meet the needs of occupants who use wheelchairs and M4(3)(2b) where the provision made must be sufficient to meet the needs of occupants who use wheelchairs. There are very different costs between the M4(3)(2a) and M4(3)(2b) standards and they will need to be considered by the Council. It should also be noted that optional requirement M4(3)(2b) applies only where the planning permission under which the building work is carried out specifies that it shall be complied with and that local plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.</p> <p><u>Internal and External Space Standards</u></p>	

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>This policy states that new dwellings across all tenures will be expected to meet as a minimum the Government's Nationally Described Space Standards (NDSS).</p> <p>The NDSS as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis. PPG identifies the type of evidence required to introduce such a policy. It states that '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. The Council will need robust justifiable evidence to introduce the NDSS, based on the criteria set out above. The HBF considers that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional.</p>	

Chapter 7 – Commercial Development (Policies 14, 15 and 16)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Leicestershire CC 15.05	Policy 14	<p>NB: This comment should be read in conjunction with comments on Policy 15: Retail and Related Policies.</p> <p>Reflecting on where many of the employment sites are located in the Borough they tend to be close to the main centres (notably the Magna Road industrial estate in South Wigston); thus it might be necessary for the coordinated redevelopment of such sites for retail purposes in order for existing town and district centres to be able to flex/expand to support/provide for strategic growth beyond the Borough’s boundaries in the Strategic Growth Plan Priority Corridor.</p> <p>Oadby is noted as an attractive place for employers with often an emphasis on a ‘local’ market offer and the need to allocate employment land in the borough for dedicated ‘start-up’ and/or ‘grow-on’ space to assist business expansion.</p>	Retail evidence does not suggest there will be a need for such an approach.
Leicestershire CC 15.05	Policy 15	<p>The borough is fortunate to have three town centres (Oadby, Wigston and South Wigston) providing retail and other services mostly serving communities within the borough.</p> <p>All three town centres have differing roles, with all forming hubs of activity and hubs for transport connections for communities. There is scope in the future for these town centres to play an enhanced role, widening their offer and broadening their appeal to existing and new communities in the Borough and within Harborough District and Blaby District.</p>	<p>Support welcomed.</p> <p>On-street parking considerations would be addressed via consultation with Leicestershire Highways Authority and interpretation of the Leicestershire Highways Design Guide as part of a planning application.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>Furthermore, the presence of a railway station at South Wigston provides potential for increased passenger rail use to the west (Coventry and Birmingham) as well as to the north and south on the Midland mainline.</p> <p>Policies to support attractive, well-functioning town, district and local centres are welcomed and help minimise the need for external travel to other places (especially by car). In the wider context of the Strategic Growth Plan strategic spatial vision, this is a particular part of the Plan's text and policy that should reflect the possible/potential need for the extent and nature of the district and town centres to flex/evolve/expand/adapt, etc. to meet the needs of residents of strategic scale development in adjoining districts (most notably Harborough in the Strategic Growth Plan Priority Growth Corridor).</p> <p>In respect of the policy wording on Taxi and Hire Vehicles, the criteria should also include impacts on on-street parking.</p>	
Leicestershire CC 15.05	Policy 16	<p>In respect of the policy wording, criteria two should also include impacts on on-street parking.</p> <p>In addition to the assessment criteria outlined we would be keen for the inclusion of criteria that considers health related criteria such as levels of deprivation and health profiles. Percentage of adults (aged 18 plus) classified as overweight or obese in Oadby and Wigston is significantly higher than the England average. Rates have varied a lot in Oadby and Wigston since 2015/16, however they are on the rise and worsening since 2019/20.</p>	<p>On-street parking considerations would be addressed via consultation with Leicestershire Highways Authority and interpretation of the Leicestershire Highways Design Guide as part of a planning application.</p> <p>Authorities which have tried to restrict takeaways on health grounds have had limited success.</p>

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		<p>There are MSOAs of concern from the Health Inequalities JSNA showing MSOA particularly vulnerable to health inequalities within the Borough: Wigston Town and South Wigston are indicated as areas of concern which also appear to correspond to areas with a higher number of fast food outlets (including related to their proximity to schools).</p> <p>We would support a policy that considers planning applications screened against health criteria and are able to work with the planning team to ensure a robust evidence based to underpin this policy.</p>	

Chapter 8 – Transport and Community Infrastructure (Policies 17, 18, 19, 20, 21 and 22)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Canal & River Trust 13.05	Policy 17	<p>Policy 17 seeks to encourage and support an improved and integrated transport network which has a greater emphasis on sustainable and active travel options. The Canal & River Trust considers that encouraging sustainable modes of travel and improved connectivity is important, particularly where such connectivity is achieved by providing opportunities for active travel. Canal towpaths are an important traffic free route for walking/cycling for both leisure and utility walkers and provide a valuable link between urban and rural areas and achieving their wider use can help to support delivery of Spatial Objective 6.</p> <p>Towpaths offer a safe, convenient and attractive walking and cycling network which links with the wider walking and cycling network across the Plan area and increasing its use and improving its accessibility will help to promote the health and well-being of local communities, consistent with the aims of Spatial Objective 9. Towpaths should therefore be considered as an integral element of the infrastructure needed to encourage and achieve greater connectivity, and to provide sustainable travel options for people to use.</p> <p>We consider that Policy 17 could specifically highlight the role that the canal towpath can play and explicitly encourage improved access to towpaths and the identification of opportunities to create links between towpaths and other walking and cycling routes and improvements to towpath surfaces to further facilitate year-round use by both walkers and cyclists wherever possible.</p>	<p>Opportunities to improve access to towpaths and the identification of opportunities to create links between towpaths and other walking and cycling routes and improvements to towpath surfaces to further facilitate year-round use by both walkers and cyclists wherever possible will be included as a local infrastructure investment opportunity in the Council's Infrastructure Delivery Plan.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Canal & River Trust 13.05	Policy 18	<p>Policy 18 supports measures to amongst other things, promote improved accessibility and enhance the pedestrian environment.</p> <p>As noted in relation to Policy 17, canal towpaths offer a safe, convenient and attractive walking and cycling network which links with the wider walking and cycling network across the Plan area and increasing its use and improving its accessibility will help to promote the health and well-being of local communities, consistent with the aims of the NPPF.</p> <p>Towpaths should therefore be considered as an integral element of the infrastructure needed to encourage and achieve greater connectivity, and to provide sustainable travel options for people to use. Achieving this will help to support the delivery of Spatial Policy 6.</p> <p>We consider that Policy 18 could specifically highlight the role that the canal towpath can play and explicitly encourage improved access to towpaths and the identification of opportunities to create links between towpaths and other walking and cycling routes and improvements to towpath surfaces to further facilitate year-round use by both walkers and cyclists wherever possible.</p>	<p>Opportunities to improve access to towpaths and the identification of opportunities to create links between towpaths and other walking and cycling routes and improvements to towpath surfaces to further facilitate year-round use by both walkers and cyclists wherever possible will be included as a local infrastructure investment opportunity in the Council's Infrastructure Delivery Plan.</p>
Canal & River 13.05	Policy 19	<p>Policy 19 supports the improvement of the health and wellbeing of residents by encouraging healthy lives and creating healthy communities that tackle the cause of ill health, inequity and inequality.</p>	<p>Opportunities to improve access to towpaths and the identification of opportunities to create links between towpaths and other walking and cycling routes and improvements to towpath surfaces to further facilitate</p>

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		<p>The Canal & River Trust considers that the health and wellbeing of local communities is an important consideration, and new development should always be required to consider how it can help to maximise opportunities for people to pursue healthier and more active lifestyles. We believe that the canal network can play a valuable role in encouraging people to be more active.</p> <p>The mental health benefits from being able to regularly access green spaces and particularly to be able to spend time by water are well-documented and canal towpaths offer a safe, convenient and attractive walking and cycling network which links with the wider walking and cycling network across the Plan area, often providing readily accessible links between urban and rural areas. Increasing its use and improving its accessibility will help to promote the health and well-being of local communities, consistent with the aims of Spatial Objective 9.</p> <p>Canals can offer a real opportunity for supporting and promoting healthier lifestyles and helping to improve the physical and mental wellbeing of local communities by encouraging people to be more active, whether through leisure and recreation (including activities such as canoeing as well as walking or cycling along towpaths) or offering a more active travelling option via towpaths that is a sustainable alternative to using private motor cars to access services and facilities. Canals provide a free-to-use resource that can benefit the whole community and it is important that nearby new development seeks to maximise the opportunities presented by them.</p>	<p>year-round use by both walkers and cyclists wherever possible will be included as a local infrastructure investment opportunity in the Council's Infrastructure Delivery Plan.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>The supporting text to Policy 19 acknowledges that the encouragement of walking and cycling is an important element of achieving healthier lifestyles for local residents and further notes that where there is potential to do so, new development should contribute towards, amongst other things, the improvement of canal towpaths (para. 8.6.8). The Trust agrees with this and considers that it is particularly important to consider the potential to secure developer contributions towards upgrading towpaths to help facilitate their wider use and also to ensure that they can cope with increased wear and tear from greater footfall.</p> <p>In order to fully realise their potential as walking and/or cycling routes, canal towpaths need to be in good condition, and increased use often leads to increased maintenance liabilities. Where new development is likely to result in an increase in use of the canal towpath, the Trust considers there is a case to consider the improvements that will be needed to the canal infrastructure to achieve this, whether through improving the towpath surface to make it more durable or improving existing, or providing new access points, including facilitating easier access for people with restricted mobility.</p> <p>As a charity, the Trust considers that developers should contribute towards such improvements to our infrastructure to offset the likely increase in maintenance liabilities that will otherwise be incurred by us. We consider therefore that it is appropriate to identify this as a requirement where new development is likely to lead to increased use of the towpath, whether as a route to access services or facilities or as a recreational resource, or where the Council wishes to encourage greater use of</p>	

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		the towpath as an active travel option.	
Oadby Civic Society 13.05	Policy 17	<p>Oadby Civic Society supports the policy as written in the document.</p> <p>The Society is in agreement with the necessity for large scale development (as defined in Policy 2: Regeneration and Large Scale Change page 26) to produce an appropriate transport assessment and Travel Plan.</p>	Support welcomed.
NHS Property Services 03.05	Policy 19	<p>Draft Policy 19 sets out the Council's commitment to making sure that new developments promote healthier lifestyles and improve overall health and wellbeing.</p> <p>NHSPS support the inclusion of policies that support healthy lifestyles, and the requirement for Health Impact Assessment on major developments. There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities.</p> <p>The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health.</p> <p>Identifying and addressing the health requirements of existing and new development is a critical way of ensuring the delivery of healthy, safe, and inclusive communities. On this basis, we welcome the inclusion of a comprehensive policy on health and wellbeing in the Local Plan, and encourage the Council to engage with the NHS on this matter ahead of the Regulation 19 document being prepared.</p>	Support welcomed.

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<p>NHS Property Services 03.05</p>	<p>Policy 21</p>	<p>Draft Policy 21 focuses on the provision of new community facilities and redevelopment of existing community facilities. NHSPS supports the provision of sufficient, quality community facilities but does not consider the proposed policy approach to be effective in its current form.</p> <p>Where healthcare facilities are included within the Local's Plan definition of community facilities, policies aimed at preventing the loss or change of use of community facilities and assets can potentially have a harmful impact on the NHS's ability to ensure the delivery of essential facilities and services for the community.</p> <p>The NHS requires flexibility with regards to the use of its estate to deliver its core objective of enabling excellent patient care and support key healthcare strategies such as the NHS Long Term Plan. In particular, the disposal of sites and properties which are redundant or no longer suitable for healthcare for best value (open market value) is a critical component in helping to fund new or improved services within a local area.</p> <p>Requiring NHS disposal sites to explore the potential for alternative community uses and/or to retain a substantial proportion of community facility provision adds unjustified delay to vital reinvestment in facilities and services for the community.</p> <p>All NHS land disposals must follow a rigorous process to ensure that levels of healthcare service provision in the locality of disposals are maintained or enhanced, and proceeds from land sales are re-invested in the provision of healthcare services locally and nationally. The decision</p>	<p>As drafted, the first paragraph of the Policy allows for a degree of flexibility, taking account of specific circumstances. Therefore, no change required.</p>

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		<p>about whether a property is surplus to NHS requirements is made by local health commissioners and NHS England. Sites can only be disposed of once the operational health requirement has ceased.</p> <p>This does not mean that the healthcare services are no longer needed in the area, rather it means that there are alternative provisions that are being invested in to modernise services.</p> <p>Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be accepted that a facility is neither needed nor viable for its current use, and policies within the Local Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land. To ensure the Plan is positively prepared and effective, NHSPS are seeking the following modification (<i>shown in italics</i>) to Draft Policy 21 to ensure the principle of alternative uses for NHS land and property will be fully supported:</p> <p>Proposed Modification to Draft Policy 21:</p> <p><i>Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, there will be no requirement to retain any part of the site in an alternative community use.</i></p>	

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Natural England 09.05	Policy 19	<p>Natural England welcomes this policy particularly the acknowledgement that green infrastructure (GI) contributes to improving health and well-being.</p> <p>We suggest that bullet point e could add reference to access to nature as an additional benefit of GI: e) Extend opportunities to maintain and improve health and wellbeing through increasing access to, protecting and improving green and blue infrastructure that encourage greater participation in physical activities; increases opportunities for social interaction in the community; and access to nature.</p>	Support welcomed. Bullet 'e' has been amended to reflect the thrust of this comment.
Natural England 09.05	Policy 22	<p>Natural England welcomes this policy and acknowledges that green infrastructure has been referenced within the wording.</p> <p>We suggest you may want to refer to Natural England's Accessible Greenspace Standards to determine open space needs based on size, proximity capacity and quality. The Environmental Improvement Plan has highlighted an initial focus on access to green and blue spaces within 15 minutes' walk from home.</p>	Council's emerging evidence on open space will be used to guide development standards in the Regulation 19 Pre-Submission Draft Plan.
McCarthy Stone 14.05	Policy 19	<p>Policy 19 requires the submission of a Health Impact Assessment for planning applications for major development.</p> <p>The Council should note that there is a common misconception that older person's housing places an additional burden on healthcare infrastructure and therefore rather than requiring applicants of older person's schemes to show that there is capacity in healthcare systems and to show that the scheme will not have a health impact, the policy should instead recognise the</p>	As drafted, the Policy allows for a degree of flexibility, taking account of specific circumstances. Therefore, no change required.

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		<p>health benefits that delivering older people's housing can bring to individuals.</p> <p>Older Persons' Housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources.</p> <p>A report "<i>Healthier and Happier' An analysis of the fiscal and wellbeing benefits of building more homes for later living</i>" by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. The analysis showed that:</p> <ul style="list-style-type: none"> • 'Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year. • Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year. • On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream 	

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		<p>housing to housing specially designed for later living.'</p> <p>In addition, specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment.</p> <p>Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack in adaptations such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder.</p> <p>Recommendation: Therefore, for the plan to be in line with national policy and effective the following wording should be added to para 2 of the policy to recognise the health benefits of older persons housing.</p> <p>Specialist Housing for older people has a number of health benefits and proposals for such schemes will not be required to submit a Health Impact Assessment.</p>	
Leicester City 15.05	Policy 17	<p>Keen to work with Council to address cross boundary impacts on the transport network of any site allocations.</p> <p>Supportive of safeguarding of potential transport route.</p>	<p>Support welcomed.</p> <p>The Council has and will continue to engage proactively under the duty to co-operate and to ensure any cross-boundary impacts are considered and agreed as part of the emerging evidence to support the two authorities respective Development Plans.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Leicester City 15.05	Policy 18	Supportive of approach towards active travel.	Support welcomed.
Leicestershire CC 15.05	Policy 17	<p>It is considered that given the spatial nature and character of the borough and the associated proximity of town centres to communities, O&W Borough provides the greatest scope for active travel and modal shift in comparison to other Leicestershire districts. Embracing this positive attribute of the Borough to realise its potential in sustainability terms is strongly encouraged.</p> <p>Overall, this part of the draft Plan largely feels very generic in terms of promoting sustainable development, encouraging active travel etc. Against the backdrop of the Leicestershire Cycling and Walking Strategy and the South of Leicester LCWIP there is the opportunity to build a powerful story around enabling a sustainable Borough, especially if the more ‘development control’ type policies of the Plan were able to reference use of the Active Travel England (ATE) assessment toolkit to assess planning applications.</p> <p>The Text and Policy as appropriate need to reflect the South of Leicester Local Cycling and Walking Infrastructure Plan and SELTS, (South East Leicester Transport Strategy), including in respect of the rationale behind the outcomes of the study, including the orbital element; similarly to include reference to LTN 1/20 Cycle Infrastructure, the Leicestershire Cycling and Walking Strategy, the South of Leicester Local Cycling and Walking Infrastructure Plan and to the Rights of Way Improvement Plan (ROWIP); and additionally to embrace the use of developer contributions not just to fund (capital) infrastructure works, but revenue measures, too (such as</p>	<p>Paragraphs 8.2.1, 8.2.2, 8.2.3 and 8.2.4 have been amended.</p> <p>Reference to Active Travel England has been incorporated into the Policy.</p> <p>The supporting text to the Policy has been expanded to explain the context of the Potential Transport Route in Oadby. However, the Policy text remains unchanged as it is written to explain that the PTR designation will be retained and protected, unless it can be demonstrated that the positive community impacts of developing the route for alternative uses demonstrably outweighs the benefits of retaining the route for sustainable transport uses in the future.</p>

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		<p>promotional and educational in respect of active travel) The end of paragraph 8.2.1 should be amended to add reference to health.</p> <p>It would be helpful if paragraph 8.2.2 was amended to include explicit reference to external (to a development) walking, cycling and wheeling connectivity to facilities and services.</p> <p>It is suggested that the final sentence of paragraph 8.2.3 should be amended along the following lines (new text in bold): <i>"In consultation with the Local Highway Authority and in accordance with the Leicestershire Highway Design Guide (or any equivalent standards/guidance that may supersede this in future)..."</i></p> <p>In respect of paragraph 8.2.4, as per the overarching comments opportunities to significantly improve the Borough's highway network beyond what has already been identified through SELTS are likely to be constrained. Additionally, Highways England are now National Highways.</p> <p>It is suggested that the paragraph be rephrased along the following lines (new text in bold): <i>"The Council will work together with the County Council as the local highway authority, National Highways, public transport operators, developers and other relevant bodies to ensure that the transport network has sufficient and appropriate capacity to manage the growth planned in the Borough and connect effectively with neighbouring areas"</i>.</p> <p>Reflecting comment i), the wording of the draft policy should be strengthened to specifically reference that the</p>	

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>ATE toolkit is included in the Borough Council's planning application validation checklist and that it will expect applicants to use it, alongside giving due consideration to the Leicestershire Highways Design Guide.</p> <p>It is noted that a 'community impacts' qualification has been included in the draft policy wording in respect of safeguarding the Potential Transport Route. Furthermore the wording refers to "<i>retaining the route for sustainable transport uses</i>" (as opposed to transport uses in general), in contrast to the current adopted Local Plan wording, which is silent (and thereby more flexible) on the particular modes of travel that may benefit from the potential route.</p> <p>Discussions about why these qualifications have been included and what their potential consequences might be, would be welcomed.</p>	
Leicestershire CC 15.05	Policy 18	<p>Comments i) to iii) in respect of draft Policy 17 apply (with the exception that the draft policy references the Local Cycling and Walking Infrastructure Plan), which perhaps highlights the extent of overlap with this draft policy. Additionally in respect of the draft policy wording:</p> <p>i) It is suggested that it should include reference to the Leicestershire Highway Design Guide, e.g. through modifying the anti-penultimate bullet point: "<i>...ensure the design of streets, parking areas, other transport elements and the content of associated standards</i></p> <p>i <i>reflects current national and local guidance, including the National Design Guide, and the National Model Design Code and the Leicestershire Highways Design Guide;...</i>"</p>	<p>Noted.</p> <p>Policy amended to include reference to the Leicestershire Highways Design Guide. The penultimate bullet has also been amended for clarity.</p>

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		<p>ii) Whilst welcoming reference to public transport services in the first criteria, it is not a form of active travel as per the policy's title.</p> <p>iii) The way in which the penultimate bullet point is worded suggests that it is intended to be targeted towards development/developers, however it actually places the 'expectation to enable and contribute' on OWBC given that it is prefaced with "<i>the Council will</i>" (as opposed to "<i>Development will</i>").</p> <p>See also comments around Policy 17.</p>	
Leicestershire Cc 15.05	Policy 19	<p>In respect of Policy item h), whilst it is perhaps the intention to use the phrase "low traffic neighbourhoods" (LTNs) as a general term, LTNs are a specific. Their use has proved highly controversial elsewhere in the country and the Government has recently strengthened national guidance, in essence to seek to limit their 'inappropriate' introduction. It may be wise to delete the specific reference to LTNs from the draft policy wording.</p> <p>Section 8.6.3 focuses on a document named as Leicestershire Joint Strategic Needs Assessment with the strategic priorities of best start in life, staying healthy, safe, and well, living being supported well, and dying well. This may have meant to refer to the Leicestershire Joint Health and Wellbeing Strategy. The strategic priorities of best start in life, staying healthy, safe, and well, living being supported well, and dying well are all within the Leicestershire Joint Health & Wellbeing Strategy https://www.lsr-online.org/uploads/leicestershire-joint-health-and-wellbeing-strategy.pdf?v=1710856564</p>	Reference to low traffic neighbourhoods removed. Reference to the Leicestershire Joint Health and Wellbeing Strategy has been included.

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		<p>There is a JSNA being published in subject-specific chapters throughout a three-year time period (2022-2025). Currently the following JSNA chapters are available: Demography, End of Life Care and Support, Inequalities, Children & Young People Mental Health, Oral Health, Substance Misuse, Alcohol Misuse.</p> <p>The Policy 19 Section incorporates suggestions made by Public Health at Leicestershire County Council and TCPA.</p> <p>There are additional supporting text information within the attached 'SP4 Improving Health and Wellbeing' document which could be included within Policy 19 if useful. Public Health team at Leicestershire County Council will look forward to continuing working closely with the planning team at Oadby and Wigston Borough Council.</p> <p>It is important to remember that the protection of human health and the environment are important elements of the Waste Framework Directive which are delivered by local planning authorities. NPPG is clear that Article 4: Waste Hierarchy and Article 13: Protection of human health and the environment are the responsibility of all planning authorities, not just waste planning authorities.</p>	
Leicestershire CC 15.05	Policy 20	<p>The County Council is currently developing an EV Strategy and would welcome the opportunity to discuss how this might be reflected in the 'final' Local Plan and the varying / respective roles that it, the Leicestershire Highways Design Guide and the Local Plan might have in establishing the policy framework for the delivery of public charge points in new developments.</p> <p>The policy refers to provisions for EV charging in all new development, but could be clearer regarding the</p>	<p>Reference to Leicestershire's Highways Design Guide (or equivalent) allows flexibility to include other relevant guidance that may become readily available in due course.</p>

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		introduction and retrofitting in existing residential and non-residential development.	
Leicestershire CC 15.05	Policy 21	Text within paragraph 8.10.3 could specifically refer to both mental and physical health being positively impacted by these sorts of facilities.	Noted.
Leicestershire CC 15.05	Policy 22	<p>As per LCC's comments in the previous Regulation 18 consultation, it is considered that the requirements for open space, sport and recreational facilities could be improved by requiring open space to be prominent within new development (i.e. at the centre or front of developments, not at the rear or other edges of development which could lessen the impact and use of such spaces), and should be designed to encourage and accommodate use/users across the life-course and those facing inequality around access and use – providing high quality multi-functional spaces.</p> <p>There are recommendations made in the Make Space for Girls – safer parks guidance that would be useful to include within this section – the recommendations support creating recreational spaces that are feel safer and more inclusive to girls and women as well providing spaces across the life course for different age groups. See - https://www.makespaceforgirls.co.uk/resources/safer-parks-for-women-and-girls-guidance</p>	The Policy has been amended to incorporate reference to creating safe and welcoming spaces for all user groups.
HBF 15.05	Policy 19	This policy states that proposals for major development or development located in an identified area of concern in the Leicestershire Joint Strategic Needs Assessment (2023) or other development likely to have a potentially significant health impact in relation to its use and/or location will be	This Policy ensures a proportionate approach will be taken by requiring the submission of a Health Impact Assessment Screening Statement on all major developments coming forward. For developments where the initial screening assessment indicates more

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		<p>required to submit a Health Impact Assessment (HIA) Screening Statement.</p> <p>The HBF generally supports plans that set out how the Council will achieve improvements in health and well-being. In preparing its local plan the Council should normally consider the health impacts with regard to the level and location of development. Collectively the policies in the plan should ensure health benefits and limit any negative impacts and as such any development that is in accordance with that plan should already be contributing positively to the overall healthy objectives of that area.</p> <p>The PPG sets out that HIAs are ‘a useful tool to use where there are expected to be significant impacts’ but it also outlines the importance of the local plan in considering the wider health issues in an area and ensuring policies respond to these. As such Local Plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. Consequently, where a development is in line with policies in the local plan a HIA should not be necessary. Only where there is a departure from the plan should the Council consider requiring a HIA. In addition, the HBF considers that any requirement for a HIA should be based on a proportionate level of detail in relation the scale and type of development proposed. The requirement for HIA for all major developments without any specific evidence that an individual scheme is likely to have a significant impact upon the health and wellbeing of the local population is not justified by reference to the PPG. Only if a significant adverse impact on health and</p>	<p>significant health impacts, a more comprehensive, in-depth Health Impact Assessment will then be required.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		wellbeing is identified should a HIA be required, which sets out measures to substantially mitigate the impact.	
HBF 15.05	Policy 20	<p>This policy states that all new development must ensure that there is suitable provision of car parking spaces and Electric Vehicle charging facilities. The HBF considers that the provision of electric vehicle charging capability is unnecessary as Part S of the Building Regulations now provides the requirements for Electric Vehicle charging in residential developments, including where exceptions may apply.</p> <p>The policy goes on to state that car parking provision and associated facilities in all new developments must accord with the standards set out in the Leicestershire Highway Design Guide (or equivalent) and the latest edition of the Building Regulations. The HBF does not consider it appropriate to require a development to accord with the standards set out in the Leicestershire Highway Design Guide (or equivalent), as any requirements within these documents will not have been tested and examined in the same way as the Local Plan and should not therefore be elevated to having the same weight as the development plan. The policy also does not need to require development to accord with the latest edition of the Building Regulations, these are a statutory instrument in their own right.</p>	<p>In order to ensure all applicants are aware of the need to refer the Building Regulations, reference to them will be retained.</p> <p>The Leicestershire Highways Design Guide has been subject to consultation, so has weight as a material consideration. Therefore, reference to this will also be retained.</p>

Chapter 9 – Design and The Built Environment (Policies 23, 24, 25, 26, 27, 28 and 29)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Canal & River Trust 13.05	Policy 24	<p>The supporting text to Policy 24 builds on the importance afforded to canal towpaths by Policy 19 by including specific reference to canal towpaths when advocating the importance of connecting new developments to existing routes (para. 9.4.14).</p> <p>We suggest that towpaths merit specific reference within the text of Policy 24 (4) to further reinforce this.</p>	<p>Policy 24 is a high level design policy that does not spell out finer details for any of the ten criteria. The Council have developed a Design Code, as part of which, many of the finer details in these representations have been considered and implemented.</p>
Swifts & Planning Group 15.05	Policy 24	<p>Please add a design code as follows:</p> <p>Swift bricks to be installed in all new-build developments including extensions, in accordance with best-practice guidance such as BS 42021 or CIEEM. Photographic evidence of installation to be provided. Artificial nest cups for house martins may be proposed instead of swift bricks where recommended by an ecologist.</p> <p>In more detail, the reason for this is:</p> <p>The National Model Design Code Part 2 Guidance Notes (2021) recommends bird bricks (Integrating Habitats section on page 25, and Creating Habitats section on page 26).</p> <p>To ensure the early inclusion of swift bricks on the drawings for an integrated design process and reliable installation on site.</p>	<p>Policy 24 is a high level design policy that does not spell out finer details for any of the ten criteria. The Council have developed a Design Code, as part of which, many of the finer details in these representations will be considered.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>Swifts bricks are the only integral boxes which meet BS 42021 as all small bird species can safely use them (swifts may become trapped in starling boxes for example).</p> <p>National planning guidance NPPG 2019 Natural Environment paragraph 023 highlights the value of swift bricks.</p> <p>Swift bricks are considered a universal nest brick suitable for a wide range of small bird species including swifts, house sparrows and starlings (e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42: https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf).</p> <p>Swift bricks are significantly more beneficial than external bird boxes as they are a permanent feature of the building, have zero maintenance requirements, are aesthetically integrated with the design of the building, and have improved thermal regulation with future climate change in mind.</p> <p>Therefore, swift bricks should be included in all developments following best-practice guidance (which is available in BS 42021:2022 and from CIEEM (https://cieem.net/resource/the-swift-a-bird-you-need-to-help/)).</p> <p>The UK Green Building Council (UKGBC) is a membership-led industry network and they have produced a document entitled: "The Nature Recovery & Climate Resilience Playbook" (Version 1.0, November</p>	

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>2022) https://ukgbc.org/resources/the-nature-recovery-and-climate-resilience-playbook/ This document is designed to empower local authorities and planning officers to enhance climate resilience and better protect nature across their local area, and includes a recommendation (page 77) which reflects guidance throughout this document: "Recommendation: Local planning Authorities should introduce standard planning conditions and policies to deliver low cost/no regret biodiversity enhancement measures in new development as appropriate, such as bee bricks, swift boxes [and bricks] and hedgehog highways."</p>	
Oadby Civic Society 13.05	Policy 27	<p>Oadby Civic Society supports the policy as written in the document as the Society considers it very important to protect the built environment.</p> <p>RECOMMENDATION:</p> <p>The Society understands that under the Government's Permitted Development Rights it is currently permissible to install PV panels on any elevation of a building within a Conservation Area.</p> <p>The whole purpose of the Policy is to safeguard against improper or damaging development. Care has to be given to the scale, appearance and materials in such developments, but to have PV panels installed totally destroys the control that should be applied.</p> <p>The Society would urge the Council to adopt a Supplementary Planning Guidance to overcome this deficiency in the Government legislation</p>	Support welcomed. SPD cannot overwrite Govt legislation

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		The Society would also urge this to be extended to Listed Buildings if they are equally exempt from PV panel installations under the Government legislation.	
Natural England 09.05	Policy 24	<p>Natural England generally supports this policy and welcomes the references to enhancing nature and making net gains for biodiversity.</p> <p>However, we suggest that reference should be made within this policy of the Natural England Green Infrastructure Planning and Design Guide 2023 which provides evidence based practical guidance on how to plan and design good green infrastructure. It complements the National Model Design Code and National Design Guide and can be used to help planners and designers develop local design guides and codes with multifunctional green infrastructure at the heart. This will help to inspire the creation of healthier, nature-rich, climate resilient and thriving places to live, learn, work and play. We suggest that the GI design guide should be included in the list of supporting evidence.</p>	<p>Support welcomed.</p> <p>Reference to the Green Infrastructure Planning and Design Guide (2023) has been included in bullets under 9.4.12.</p>
Leicestershire CC 15.05	Policy 23	<p>NB: This comment should be read in conjunction with the overarching comments with regard to Beautiful and high quality development.</p> <p>i) It would be good to include something about how areas of public realm should be safely accessible/negotiable by all appropriate road users, including those with visual impairments.</p> <p>ii) Neither the text nor the draft policy make reference to long term maintenance and the costs and liabilities that can arise.</p>	<p>The Council's Developer Contributions Supplementary Planning Document includes all detail regarding long term maintenance regimes for infrastructure, as well as the associated costs and liabilities that can arise.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		Reference to the Leicestershire & Rutland Historic Environment Record is welcomed.	
Leicestershire CC 15.05	Policy 24	<p>NB: See overarching comments with regard to the role that this Plan needs to play in securing beautiful and high quality development.</p> <p>It is suggested that section 4 of the draft policy and paragraph 9.4.14 of the supporting text should refer to the route network identified through the South of Leicester LCWIP (and its future successors).</p> <p>In relation to section 7 of the draft policy (and in particular bullet points 4 and 5 within this section), please see our previous comments for Policy 12 in respect of locational choices for older persons housing, affordable housing and M3 standard wheelchair accessible dwellings.</p> <p>In relation to section 10 of the draft policy, it is suggested that the second bullet point should be expanded along the following lines (new text in bold and underlined): <i>“Create attractive public spaces for the present and future generations through integrating well-designed places that are robust, durable, and easy to look after, with maintenance responsibilities that are clearly defined for all parts of a development and appropriate funding and/or delivery agreements in place to ensure that such responsibilities are fulfilled in practice”.</i></p> <p>We welcome mention of the use of recycled aggregate in the supporting text and the need for storage of waste in the policy text. We also welcome the minimisation of the need for resources in the policy text and the use of high-quality materials suitable for context. Perhaps the</p>	<p>Policy 24 is a high level design policy that does not spell out finer details for any of the ten criteria. The Council has developed a Design Code, as part of which, many of the finer details in these representations will be considered.</p> <p>Section 10, bullet 2, has been amended.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		supporting text could mention local vernacular and the use of natural stone.	
Leicestershire CC 15.05	Policy 25	With regard to the potential for the Borough to act as a 'gateway' to strategic growth in the Strategic Growth Plan Priority Corridor, it may be necessary for this policy to provide flexibility to allow for the provision of infrastructure to access such.	Noted.
Leicestershire CC 15.05	Policy 26	It is understood that the Canal & River Trust are trying to make more of waterways (e.g. Kilby Bridge area), and it is noted that O&W Borough has some significant natural assets.	Noted.
Leicestershire CC 15.05	Policy 27	This may also be an opportunity to talk of local vernacular and natural stone.	Noted.
Leicestershire CC 15.05	Policy 28	<p>We welcome the supporting text's mention of reducing construction waste and re-use and recycling as much as possible and use of the waste hierarchy.</p> <p>We also welcome the mention of minimising or re-using waste in the policy text and also its mention of provision for waste collection and recycling and encouraging the use of locally sourced, reclaimed, recycled or low environmental impact products in design and construction and provision of facilities for effective waste management in the operation of development.</p> <p>There is one suggested amendment to the policy text (see bold underlined text):</p> <p>Policy 28: Sustainable Design and Construction (Non-Strategic) ...'<i><u>Development must demonstrate how carbon</u></i></p>	Support welcomed. Policy amended.

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<i>emissions have been addressed and minimised including through materials sourcing, development design and layout, the energy hierarchy, water cycle, waste hierarchy and waste management solutions (during and post-construction).</i>	
Environment Agency 20.06	Policy 23	We welcome the acknowledgement that all public realm redevelopment or improvements must contribute towards reducing carbon emissions and therefore impact on climate change.	Support welcomed.
Environment Agency 20.06	Policy 28	<p>We welcome the inclusion of this section and the commentary provided within it.</p> <p>We support policies that drive up standards for sustainable construction. LPAs can set higher energy performance standards than Building Regulations in their Local Plans, under specific conditions, please see this link for further information.</p> <p>We encourage rainwater capture and reuse policies, particularly at development scale for development types where this will reduce greenhouse gas emissions and support water resources.</p> <p>We wish to emphasise the importance of integrating green and blue infrastructure, including SuDS, to address climate impacts. Benefits from this infrastructure include reducing the need for both cooling and heating of buildings, and in turn associated greenhouse gas emissions.</p> <p>Tree planting, green walls and roofs should be encouraged. These provide multi-functional benefits</p>	<p>Support welcomed.</p> <p>The suite of policies in 'Chapter 9: Design and the Built Environment' ensure that all of these suggestions are incorporated into the Plan.</p>

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		including carbon sequestration, reducing exposure to poor air quality, wellbeing and biodiversity gains, flood resilience, and shading and cooling of buildings.	

Chapter 10 – Natural Environment (Policies 30, 31, 32, 33, 34, 35 and 36)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Canal & River Trust 13.05	Policy 30	<p>The canal network within the Borough is an important element of its strategic green/blue infrastructure and in addition to being a blue infrastructure asset in its own right, it also provides a valuable link between other areas of green and blue infrastructure.</p> <p>Policy 30 rightly highlights the role that green/blue infrastructure can play in encouraging healthy and active lifestyles through connectivity between green infrastructure assets, including public rights of way, bridleways, cycleways and waterways.</p> <p>We recommend that canal towpaths should be specifically referenced within Policy 30 in this respect.</p>	<p>Policy 30 is a high-level strategic policy that does not spell out finer details for any of the identified features.</p>
The Woodland Trust 11.04	Policies 30, 31 and 35	<p>Specifically, we would like to see the LP expand on these environmental principles in the following ways.</p> <p>1. Protection of valued habitats must be at the heart of the LP. In particular, irreplaceable habitats, including ancient and veteran trees, must be protected from loss and damage. To achieve this, the LP should:</p> <ul style="list-style-type: none"> • Give weight to the relevant LNRS, as it is refined, which should identify ancient woodland sites, to ensure that development is not allocated in close proximity to ancient woodland. • For veteran trees, the LP should encourage them to be recorded on the Ancient Tree Inventory,² and to consider locations where it might be suitable to place a 	<p>Policy 30 is a high-level strategic policy that does not spell out finer details for any of the identified features.</p> <p>Policy 31: Policy does protect irreplaceable habitats. LNRS still being developed by Leicestershire County Council and the Borough Council is liaising over this.</p> <p>Position around BNG is evolving and likely to change further. The Policy approach is in-line with National Legislation.</p> <p>Policy 35: Amendments incorporated.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>Tree Preservation Order on any ancient, veteran or notable trees recorded. In addition, the LP should encourage a buffer zone³ to exceed the minimum distances stipulated in planning advice.</p> <ul style="list-style-type: none"> • For non-ancient and veteran trees, adopt the Bristol Tree Replacement Standard⁴ with respect to felling and specify replacement trees be planted no more than 12 times the distance of the original tree's trunk diameter, to correspond with root extent area. • The LP must go beyond minimum requirements for BNG and be an example of best practice. • The LP should require development projects to deliver 20 per cent BNG.⁵ • Consideration should be given to the quantum of other investment sources (public and private) which will be needed in order to meet these targets. <p>The LP should require BNG units to be maintained for a minimum of 50 years, not just the 30 set out in the Environment Act. ▪ This is particularly important for woodland creation, as it takes many decades for new woods to reach maturity and their full ecological potential.</p> <ul style="list-style-type: none"> ▪ BNG should deliver a rich mix of habitats including native woodland, informed by LNRSeS. ▪ Habitat creation funded through other mechanisms (such as public funds) should also be maintained in the long term. <p>1 The LP should give strong weight to LNRSeS for development site allocation at a local level.</p> <p>2 This will be essential to embed avoidance of impacts to existing sensitive natural assets, by providing a</p>	

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>'spatial' element to site allocation decisions. It is vital that development is allocated in a way which protects important sites for nature, maintains ecological integrity and maximises potential enhancements from land in recovery.</p> <p>3 Once a site has been allocated in a local plan, it is more likely to receive planning permission, so it is essential to embed ecologically coherent criteria for spatial prioritisation at the framework level.</p> <p>4 LNRSes should also be used to inform priority locations for the provision of green infrastructure, and habitat creation and enhancement through BNG.</p> <p>1 The LP should set standards for high-quality green infrastructure for development.</p> <p>2 Everyone should be able to see three trees from their home.</p> <p>3 Similarly, no one should be more than 300 metres from the nearest natural green space, with safe and accessible routes.</p> <p>4 Consideration should also be given to the Woodland Trust's Access to Woodland Standard which aspires that everyone should have a small wood of at least two hectares in size and a larger wood of at least 20 hectares in size within four kilometres of where they live.</p> <p>5 A strong tree retention standard⁶ for responsible development must also be embraced, ensuring the preservation of trees and their ecological benefits. This standard will require a thorough tree survey during initial site investigations, categorising trees by their health and quality (A, B, C or U), and submitting a clear Tree Retention Plan. Additionally, it will mandate the creation of</p>	

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>a Tree Protection Plan, safeguarding tree root systems and establishing construction exclusion zones (CEZs).</p> <p>In summary, we consider that the Environmental Principles must be treated as a foundational component of the LP. As part of incorporating the principles, the LP must support the protection of sensitive natural assets, such as ancient and veteran trees; be an exemplar of emerging BNG practice; and set high standards for the retention and provision of trees within developments.</p>	
Swifts & Planning Group 15.05	Policy 30	<p>Object.</p> <p>In summary, please consider endangered urban wildlife such as red-listed bird species which inhabit buildings in Oadby & Wigston.</p> <p>Therefore, please add to the policy: Swift bricks to be installed in new developments including extensions, in accordance with best practice guidance such as BS 42021 or CIEEM which require at least one swift brick per home on average for each development. Artificial nest cups for house martins may be proposed instead of swift bricks where recommended by an ecologist.</p> <p>In more detail, the reason for this is that bird boxes/ bricks and other species features are excluded from the DEFRA Biodiversity Net Gain metric and many Green Infrastructure definitions, so require their own clear policy.</p> <p>The Government's response in March 2023 to the 2022 BNG consultation stated that: "We plan to keep species features, like bat and bird boxes, outside the scope of the biodiversity metric... [and] allow local planning authorities to consider what conditions in relation to those features</p>	Policy 30 is a high-level strategic policy that does not spell out finer details for any of the identified features.

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		<p>may be appropriate" (page 27, https://consult.defra.gov.uk/defra-net-gain-consultation-team/technicalconsultation_biodiversitymetric/).</p> <p>Swift bricks are the only type of bird box specifically mentioned as valuable to wildlife in national planning guidance, along with bat boxes and hedgehog highways (NPPG Natural Environment 2019 paragraph 023). The National Model Design Code Part 2 Guidance Notes (2021) also recommends bird bricks (Integrating Habitats section on page 25, and Creating Habitats section on page 26).</p> <p>Swift bricks are considered a universal nest brick suitable for a wide range of small bird species including swifts, house sparrows and starlings (e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42: https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf).</p> <p>Swift bricks are significantly more beneficial than external bird boxes as they are a permanent feature of the building, have zero maintenance requirements, are aesthetically integrated with the design of the building, and have improved thermal regulation with future climate change in mind.</p> <p>Therefore, swift bricks should be included in all developments following best-practice guidance (which is available in BS 42021:2022 and from CIEEM</p>	

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		<p>(https://cieem.net/resource/the-swift-a-bird-you-need-to-help/).</p> <p>The UK Green Building Council (UKGBC) is a membership-led industry network and they have produced a document entitled: "The Nature Recovery & Climate Resilience Playbook" (Version 1.0, November 2022) https://ukgbc.org/resources/the-nature-recovery-and-climate-resilience-playbook/ This document is designed to empower local authorities and planning officers to enhance climate resilience and better protect nature across their local area, and includes a recommendation (page 77) which reflects guidance throughout this document: "Recommendation: Local planning Authorities should introduce standard planning conditions and policies to deliver low cost/no regret biodiversity enhancement measures in new development as appropriate, such as bee bricks, swift boxes [and bricks] and hedgehog highways."</p> <p>Many other Local Authorities are including detailed swift brick requirements in their Local Plan, such as Tower Hamlets Local Plan Regulation 18 stage (paragraph 19.70, page 311 - https://talk.towerhamlets.gov.uk/17424/widgets/82097/documents/50138), which follows the exemplary swift brick guidance implemented by Brighton & Hove since 2020, and Wiltshire Local Plan Regulation 19 stage, which requires an enhanced number of 2 swift bricks per dwelling (policy 88: Biodiversity in the built environment, page 246 - "As a minimum, the following are required within new proposals: 1. integrate integral bird nest bricks (e.g., swift bricks) at a minimum of two per dwelling;" https://www.wiltshire.gov.uk/article/8048/Current</p>	

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p><u>-consultation-Reg-19</u>), and Cotswold District Council are proposing three swift bricks per dwelling in their current Local Plan consultation (Policy EN8 item 6, and paragraph 0.8.4, https://www.cotswold.gov.uk/planning-and-building/planning-policy/local-plan-update-and-supporting-information/), so such an enhanced level should also be considered.</p>	
Swifts & Planning 15.05	Policy 31	<p>Existing nest sites for building-dependent species such as swifts and house martins should be protected, as these endangered red-listed species which are present but declining in Oadby & Wigston return annually to traditional nest sites. Mitigation should be provided if these nest sites cannot be protected.</p> <p>This is because nesting sites in buildings are excluded from the Biodiversity Net Gain methodology so need their own clear policy.</p>	Policy 31 is a high-level strategic policy that does not spell out finer details for any of its policy aims.
Oadby Civic Society 13.05	Policy 33	<p>Oadby Civic Society totally supports Policy 33 and its clear objectives which the Society considers essential to maintain separation between settlements, particularly between Oadby and Wigston.</p> <p>Maintenance of Green Wedges not only provides separation between settlements, but also enhances the Council's ability to address healthy lifestyles, climate change and biodiversity.</p> <p>The Green Wedge between Oadby and Wigston also provides an environmental extension to the Country Park.</p> <p>RECOMMENDATION Oadby Civic Society would recommend that the new Local Plan 2021-2041 extends the Oadby and Wigston Green Wedge to the South as far as Newton Lane in order to</p>	Support welcomed. Changes to/extent of green wedge will reflect suitability of sites proposed for development.

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		<p>maintain the principle of settlement separation when there is pressure for residential expansion within the Borough and failing to extend the Green Wedge could lead to the possibility of development linking up with a southern “pincer movement”.</p> <p>This proposal would affect some of the Site Options in the Wigston area such as: WIG/004, WIG/005, WIG/007, WIG/008.</p>	
Natural England 09.05	Policy 30	<p>Support. Natural England supports this policy and welcomes the positive approach to Green Infrastructure provision that it sets out. We are also pleased that GI features throughout the Plan which will ensure that the multi-functional benefits of the provision of good quality GI can be fully realised.</p> <p>We welcome the reference within the explanatory text to Natural England’s Green Infrastructure Framework: Principles and Standards. We suggest that your authority may want to apply the National GI Standards locally that will help deliver good GI networks for people and nature by including them within the local plan. These include - Accessible Greenspace Standard, Urban Nature Recovery Standard, Urban Greening Factor, Urban Tree Canopy Cover Standard. These standards can provide the output measures so that developers have certainty over what green infrastructure is needed on site. They can be included as site specific and area-based requirements in site allocation policies.</p> <p>To help the GI standards to be delivered local authorities could set green infrastructure targets. These should include delivery levels over time for instance, the % of</p>	<p>Support noted.</p> <p>A new Green and Blue Infrastructure Study has been completed and will be published as evidence to support the Regulation 19 Pre-Submission Draft Plan.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>people having good quality publicly accessible greenspaces within 15 minutes' walk from home by 2030.</p> <p>We advise that your authority adopts the recommended standards where relevant and provides further detail to local standards where required.</p> <p>We suggest you may want to refer to the Council's Green Infrastructure Plan (2018) or if there is an intention to update this (Oadby and Wigston Borough (oadby-wigston.gov.uk)).</p>	
Natural England 09.05	Policy 31	<p>Object. Natural England welcomes this policy but suggests the following:</p> <p>Within the explanatory text of this policy we suggest that there should be greater reference to the Nature Recovery Network (NRN). This is a major commitment in the UK Government's 25-Year Environment Plan which intends to improve, expand and connect habitats to address wildlife decline and provide wider environmental benefits for people. By creating more wildlife-rich places that are bigger, better and joined-up the three challenges of biodiversity loss, climate change, and public health and well-being can be addressed. As part of this work Local Nature Recovery Strategies (LNRS) will agree priorities and work with partners and stakeholders to map actions for nature recovery where they will have the greatest environmental benefit. We advise that Policy 31 provides a specific reference to the Local Nature Recovery Strategy (LNRS) for Leicestershire & Rutland as it develops (For further information - The Nature Recovery Network -</p>	<p>Support welcomed.</p> <p>This is an emerging and evolving area the Regulation 19 Pre-Submission draft plan has been amended to reflect a more up to date position.</p>

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		<p>GOV.UK (www.gov.uk) and What a Local Nature Recovery Strategy is Leicestershire County Council</p> <p>The Local Nature Recovery Strategy (LNRS) will play a key role in biodiversity net gain by determining the ‘strategic significance’ multiplier within the statutory biodiversity metric. While the LNRS is being prepared, it is important that local authorities state which alternative strategy landowners and developers should refer to when planning for biodiversity net gain. This could include your draft LNRS or existing biodiversity action plans. The statutory Biodiversity Metric user guide includes a full list of possible alternative strategies.</p> <p>It may be useful to explain that registered offsite biodiversity gains should be sited locally to the development impact (i.e. within the Borough or National Character Area).</p> <p>Please note that now that BNG has become mandatory the metric will be known as the Statutory Biodiversity Metric therefore this section of the policy text could be changed as follows: “ <i>..demonstrated via a Biodiversity Net Gain Plan using the Statutory Biodiversity Metric and provide details of the long-term maintenance and management of the net gain</i>”</p>	
Natural England 09.05	Policy 33	<p>Support.</p> <p>Natural England supports this policy and the intention to retain and enhance the role that the Green Wedges play towards the Green Infrastructure Network and biodiversity.</p> <p>We suggest that there may also be a role for Green Wedges in providing areas for Biodiversity Net Gain off-set sites, which may be a way to further enhance and</p>	Support welcomed. Suggested approach would be consistent with BNG guidance and local plan.

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		enrich biodiversity and contribute to the green infrastructure network.	
Natural England 02.07	Policy 31	<p>'How to use district level licensing information in plan-making</p> <p>District level licensing risk zone maps can help you protect great crested newts in your area.</p> <p>You should:</p> <ul style="list-style-type: none"> • discourage development in red zones • encourage development away from amber zones where possible • explain the risk zones to developers and their agents so they know their survey needs and licensing options early on <p>The risk zone maps can also help you protect great crested newts when you draw up local, neighbourhood and other plans.'</p> <p>I've checked our most recent plan responses, and I was wrong, we haven't mentioned DLL yet, so I've looked into it and have the following comments:</p> <p>There's no need for a specific policy to cover DLL, the bottom line remains that impacts to GCN will need to be licenced, as normal & as per the Wildlife and Countryside Act (1981) and the Conservation of Habitats and Species Regulations (2017).</p> <p>In your Biodiversity policy explanation, explaining what DLL is, is likely the key. As DLL is still quite new, including mention of it within the plan will make developers aware of it if they haven't come across it before.</p> <p>DLL is always optional for developers, as they can opt to use traditional mitigation licencing if they wish; it is</p>	Noted. Feel better addressed through development management process.

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		ultimately their decision which route they take. We need to be careful about endorsing one approach over another but setting out the differences and opportunities of DLL (i.e. no survey requirement, time saving, strategic mitigation approach) can help to inform that choice.	
Leicestershire CC 15.05	Policy 30	There may be the opportunity to join development into more strategic GBI delivered by mineral or waste site restoration which could be mentioned here.	Paragraph 10.2.1 acknowledges the role that GBI can play at a strategic level.
Leicestershire CC 15.05	Policy 32	Clarity/confirmation would be welcomed as to whether Policy 17, when taken together with the National Planning Policy Framework's guiding principles, is sufficient to mitigate any risk of the Potential Transport Route being identified as a Local Green Space.	The supporting text to this Policy sufficiently explains the role and rationale behind LGS designation.
Leicestershire CC 15.05	Policy 33	The Green Wedge, an effective and successful planning policy tool in the borough, City and other districts adjacent to Leicester, needs to be considered for expansion into Harborough District (also possibly Blaby District) to help shape and define existing and new communities, and to provide access to and visual benefits from green space	The Council have undertaken a Green Wedge Review as part of the suite of evidence to support the Regulation 19 Pre-Submission Draft Plan.
Leicestershire CC 15.05	Policy 34	With regard to the potential for the Borough to act as a 'gateway' to strategic growth in the Strategic Growth Plan Priority Corridor, it may be necessary for this policy to provide flexibility to allow for the provision of infrastructure to access such.	Reference to the strategic role of the Countryside has been included in the supporting text to this Policy.
Leicestershire Cc 15.05	Policy 35	The County Council has been undertaking a piece of work in respect of 'Value of Trees' and the opportunity would be welcomed to explore whether it might be appropriate to reference that work in either the policy or the policy's supporting text.	Noted. Can be discussed via duty to cooperate meetings.

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Highcroft Householders Association 08.06	Policy 33	<p>Highcroft Park is a small community owned park, which sits behind Park Crescent, Glen Way, and Ashtree Road in Oadby.</p> <p>The park is owned and managed by the Highcroft Householders Association, (HHA) a registered charity established in 1957.</p> <p>The park was designated as a Local Green Space in 2018, and is also registered with Oadby and Wigston Borough Council as an Asset of Community Value.</p> <p>Residents discussed the new Local Plan at our AGM on the 7th June and wish to register as part of the planning consultation process, strong support for the Highcroft Park to continue with the designation of a Local Green Space.</p>	A Local Green Space Review has been carried out and has been published as evidence to support the Regulation 19 Pre-Submission Draft Plan.
HBF 15.05	Policy 31	<p>This policy states that in accordance with the latest National Guidance, all new developments must provide a minimum 10% net gain in biodiversity. It suggests that the net gain must be measurable; accessible by the public, on site in the first instance or through biodiversity off-setting if necessary; demonstrated via a Biodiversity Net Gain Plan using the most up to date biodiversity accounting metric developed by DEFRA.</p> <p>In light of all the new guidance on Biodiversity Net Gain (BNG) that has recently been published, the Council will need to ensure its approach to BNG to ensure it fully reflects all the new legislation, national policy and guidance. The HBF has been involved in a significant amount of work, being led by the Future Homes Hub, on</p>	Since Biodiversity net gain is now mandatory, Local Plans do not need to repeat National Policy.

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		<p>BNG preparedness for some time and note the final version of DEFRA BNG Guidance was published on 12th Feb 2024 and the final version of the PPG published on Feb 14th 2024. The HBF understands that both may be further refined once mandatory BNG is working in practice, to reflect any early lessons learnt. The HBF notes that there is a lot of new information for the Council to work through and consider the implications of, in order to ensure that any policy on BNG policy so that it complies with the latest policy and guidance now this has been finalised. It is important that mandatory BNG does not frustrate or delay the delivery of much needed homes.</p> <p>The PPG is clear that there is no need for individual Local Plans to repeat national BNG guidance. It is HBF's opinion that the Council should not deviate from the Government's requirement for 10% biodiversity net gain as set out in the Environment Act. There are significant additional costs associated with biodiversity gain, which should be fully accounted for in the Council's viability assessment.</p> <p>Although the national policies requiring 10% BNG cannot be subject to site specific viability discussion, any policy requirements over 10% can be. Any policy seeking more than 10% BNG needs to reflect this position. The PPG is also clear that plan makers should not seek a higher percentage than the statutory objective for 10% BNG, unless justified. Therefore, the HBF recommends that the policy is amended to state '10%' rather than 'a minimum of 10%'.</p>	

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		<p>The HBF notes that BNG has been designed as a post permission matter to ensure that the 10% BNG will be met for the development granted permission. Schedule 14 of the Environment Act sets out that a general condition will be applied to every planning permission (except those exempt from BNG) that a BNG Plan should be submitted and approved by the LPA before commencement of development. Therefore, the Council cannot require a final BNG Plan to be provided at application stage. This is particularly the case for large sites where development will be phased. The PPG now includes additional Guidance on how phased development should be considered, which the Council will need to consider and accommodate when revising this BNG policy. The PPG clearly sets out what information an applicant must submit as part of a planning application, and as planning policy does not need to repeat this guidance, the HBF recommends that this section of the policy be deleted.</p> <p>The HBF notes that the lack of flexibility in the policy and considers that the Council may want to review this. The HBF also considers that it would be appropriate to differentiate between the purchase of off-site units, and purchase of national credits as per the biodiversity gain hierarchy.</p> <p>The HBF recommends that that Council work closely with the HBF, PAS, DEFRA and others with expertise in BNG</p>	

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		to ensure that the policy is amended appropriately to reflect the latest position.	
HBF 15.05	Policy 35	<p>This policy states that any trees or hedgerows removed should, where practical and appropriate, be replaced on a greater than 1:1 basis to retain and enhance levels of canopy coverage and contribute to on-site biodiversity net gain. It goes on to state that all major developments in LSOAs with a canopy coverage score of under 16.5% will be required to provide a minimum on site canopy coverage of at least 16.5%.</p> <p>The HBF is concerned by the potential tree replacement strategy and tree canopy policy provided, this could have significant potential implications in terms of viability of the development, not only due to the tree provision costs but also in terms of efficient land use, site layout and highways considerations. The HBF considers that it will be important for the Council to gather appropriate evidence in relation to this policy that considers its practical implementation, and how it sits alongside other plan requirements.</p>	The Council has both a GBI Study and also a Whole Plan Viability Assessment to assess if this Policy approach is appropriate and viable.
Forestry Commission 14.05	Policy 31	<p>The Forestry Commission encourages local authorities to consider the role of trees in delivering planning objectives as part of a wider integrated landscape approach.</p> <p>For instance through:</p> <ul style="list-style-type: none"> The inclusion of green infrastructure (including trees and woodland) as a requirement in and around new development. With the Government aspirations to plant 30,000 ha of woodland per year across the UK by 2025. The Forestry Commission is seeking to ensure that tree 	This Policy reflects advice of NPPF. The importance of ancient woodland, ancient trees, veteran trees is acknowledged and therefore, Policy 31 has been strengthened to reflect this position.

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		<p>planting is a consideration in every development not just as compensation for loss.</p> <ul style="list-style-type: none"> Promoting the use of home grown timber used in construction as a sustainable building material, therefore reducing the embodied carbon emissions of new builds. In line with the Government's 25 Environment Plan (Page 47), the "Timber in construction" roadmap and the Net Zero Strategy. <p>Policy 31 – Protecting Biodiversity and Geodiversity (Strategic) – Irreplaceable Habitats</p> <p>We note the inclusion of text from paragraph 186 (c) of the National Planning Policy Framework, stating:</p> <p><i>“Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons (and a suitable compensation strategy exists)”</i></p> <p>With supporting conditions for when loss would apparently be permitted. However, as Ancient woodland, ancient trees and veteran trees are irreplaceable, you should not consider proposed compensation measures as part of your assessment of the merits of a development proposal.</p> <p>We particularly refer you to further technical information set out in Natural England and Forestry Commission's Standing Advice on Ancient Woodland – plus supporting</p>	

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		Assessment Guide and “Keepers of Time” – Ancient and Native Woodland and Trees Policy in England.	
Environment Agency 20.06	Policy 30	<p>We welcome the inclusion of this section and the commentary provided within it. We do request though the following change in wording:</p> <p>10.1.1 Amend wording to include <i>extend</i> i.e., “Seeks to maintain, preserve, enhance and extend the green and blue...”</p>	<p>Support welcomed.</p> <p>Amendment incorporated.</p>
Environment Agency 20.06	Policy 31	<p>We welcome the inclusion of this section and the commentary provided within it. We do request though the following change in wording:</p> <p>10.3.1 This policy must ensure that biodiversity is protected, conserved, enhanced, and created (i.e., through biodiversity net gain). We therefore don’t consider it appropriate to state here that the policy only “Seeks to protect biodiversity... and also seek net gains <i>where possible and appropriate...</i>” Rather, this sentence should read “Seeks to protect, conserve, enhance and increase all important biodiversity and geodiversity in the Borough area, but also and seek net gains where it is possible and appropriate to do so.”</p> <p>10.4.1 Consideration should be given to include “loss of connectivity” in the list of possible indirect impacts to highlight this as a major risk factor for biodiversity.</p>	<p>Support welcomed.</p> <p>Amendment incorporated.</p>

Chapter 11 – Monitoring and Implementation (Policy 37)

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HBF15.05	Policy 37	<p>This policy states that the Council will monitor progress towards the achievement of indicators and targets set out in the Monitoring Framework. It suggests that where policy specific targets have not been met actions listed in the Framework will apply. It also sets out that the Council will review whether the Plan needs updating at least once every five years taking account of changing circumstances and relevant changes in national policy.</p> <p>The HBF considers this is more of a statement of intent rather than a policy and does not appear to serve a clear purpose, and whilst it is useful to have the information set out, the HBF does not consider it is necessary for this to be policy.</p> <p>Monitoring The HBF recommends that the Council include an appropriate monitoring framework which sets out the monitoring indicators along with the relevant policies, the data source and where they will be reported, this should also include the targets that the Plan is hoping to achieve and actions to be taken if the targets are not met. The HBF recommends that the Council provide details as to how the plan will actually be monitored, and identifies when, why and how actions will be taken to address any issues identified.</p>	<p>The Regulation 19 Pre-Submission Draft Plan has been updated to include a Monitoring Framework setting out proportionate monitoring indicators along with the relevant policies, the data source and where they will be reported. The framework includes targets that the Plan is hoping to achieve and actions to be taken if the targets are not met. The framework sets out how these will be monitored, and identifies when, why and how actions will be taken to address any issues identified.</p>

Appendix 1 – Oadby Site Options (OAD/001 – OAD/015)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Oadby Civic Society 13.05	OAD/002	<p>Object. Site Options OAD/002, OAD/009, OAD/010, OAD/011</p> <p>Oadby Civic Society objects to these sites being designated for Residential use as they form a significant part of the Oadby, Thurnby and Stoughton Green Wedge.</p> <p>The Society is totally opposed to any land use in a Green Wedge which does not comply with the conditions set out in Policy 33.</p> <p>The Society is totally supportive of the Green Wedge Policy 33, (see separate response), and would urge the Council to maintain this principle with the consequential land use implications.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Oadby Civic Society 13.05	OAD/009	<p>Object. Site Options OAD/002, OAD/009, OAD/010, OAD/011</p> <p>Oadby Civic Society objects to these sites being designated for Residential use as they form a significant part of the Oadby, Thurnby and Stoughton Green Wedge.</p> <p>The Society is totally opposed to any land use in a Green Wedge which does not comply with the conditions set out in Policy 33.</p> <p>The Society is totally supportive of the Green Wedge Policy 33, (see separate response), and would urge the Council to maintain this principle with the consequential land use implications.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Oadby Civic	OAD/010	Object.	

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Society 13.05		<p>Site Options OAD/002, OAD/009, OAD/010, OAD/011</p> <p>Oadby Civic Society objects to these sites being designated for Residential use as they form a significant part of the Oadby, Thurnby and Stoughton Green Wedge.</p> <p>The Society is totally opposed to any land use in a Green Wedge which does not comply with the conditions set out in Policy 33.</p> <p>The Society is totally supportive of the Green Wedge Policy 33, (see separate response), and would urge the Council to maintain this principle with the consequential land use implications.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Oadby Civic Society 13.05	OAD/011	<p>Object.</p> <p>Site Options OAD/002, OAD/009, OAD/010, OAD/011</p> <p>Oadby Civic Society objects to these sites being designated for Residential use as they form a significant part of the Oadby, Thurnby and Stoughton Green Wedge.</p> <p>The Society is totally opposed to any land use in a Green Wedge which does not comply with the conditions set out in Policy 33.</p> <p>The Society is totally supportive of the Green Wedge Policy 33, (see separate response), and would urge the Council to maintain this principle with the consequential land use implications.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Oadby Civic Society 13.05	OAD/007	<p>Object.</p> <p>Site Option OAD/007</p> <p>Oadby Civic Society objects to this site being designated for Residential use as this site forms an intrinsic part of the</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option,</p>

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		<p>Green Wedge separating Oadby from Wigston and which was enhanced at the last Local Plan review.</p> <p>Additionally, the access to the site would need to be via the existing road infrastructure which is not designed for additional development, and we understand has been rejected previously by County Highways. There is difficulty already in using the existing roads in this vicinity, particularly at peak school times.</p> <p>The land slopes to the south meaning that any foul drainage would have to be pumped which would render the site development uneconomic.</p>	<p>including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Oadby Civic Society 13.05	OAD/012	<p>Object. Site Options OAD/012, OAD/013</p> <p>Oadby Civic Society is opposed to any loss of car parking on both these sites serving the centre of Oadby. Loss of parking would be very detrimental to the viability of Oadby town Centre.</p> <p>For any development to take place whilst maintaining all the car parking would necessitate raised deck parking to compensate for loss of spaces and to accommodate the additional parking required by the development.</p> <p>This would be economically unviable in development terms. Even building over the existing spaces would still require additional spaces for the development itself, still registering the site development uneconomic.</p> <p>In order to ensure that no parking is lost, the Society considers these 2 sites should be excluded from potential</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		development sites.	
Oadby Civic Society 13.05	OAD/013	<p>Object. Site Options OAD/012, OAD/013</p> <p>Oadby Civic Society is opposed to any loss of car parking on both these sites serving the centre of Oadby. Loss of parking would be very detrimental to the viability of Oadby town Centre.</p> <p>For any development to take place whilst maintaining all the car parking would necessitate raised deck parking to compensate for loss of spaces and to accommodate the additional parking required by the development.</p> <p>This would be economically unviable in development terms. Even building over the existing spaces would still require additional spaces for the development itself, still registering the site development uneconomic.</p> <p>In order to ensure that no parking is lost, the Society considers these 2 sites should be excluded from potential development sites.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Oadby Civic Society 13.05	OAD/006	<p>Comment. Site Options OAD/006, OAD/015, WIG/002</p> <p>Oadby Civic Society supports the Policy 33-Green Wedges and the importance of no residential building in the Green Wedges. This puts pressure on sites outside of the Green Wedges for necessary development, regrettably land designated as Countryside.</p> <p>To avoid residential development in the Green Wedges, the Society would suggest that major development would</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>be better located in the above identified sites in the Countryside.</p> <p>Option Site WIG/002: This would be an extension of the current Residential Allocation with managed effect on the environment, particularly if Oadby Civic Society's recommendation under Policy 33 response extends the Oadby and Wigston Green Wedge to the South as far as Newton Lane.</p> <p>Option Sites OAD/006 and OAD/015: These 2 sites together with the possibility of joint collaboration with Harborough DC would be of sufficient size to warrant a comprehensive development plan that would not only include residential provision but also schools and a Local Centre (possibly including a Doctor's surgery). This would enable these sites to be capable of providing the mix of accommodation so badly needed with particular reference for the need for more elderly provision such as flats and bungalows which would only be viable if support facilities were to hand. There is no means of providing additional bungalows close to the existing Town Centres.</p>	
Oadby Civic Society 13.05	OAD/015	<p>Site Options OAD/006, OAD/015, WIG/002</p> <p>Oadby Civic Society supports the Policy 33-Green Wedges and the importance of no residential building in the Green Wedges. This puts pressure on sites outside of the Green Wedges for necessary development, regrettably land designated as Countryside.</p> <p>To avoid residential development in the Green Wedges, the Society would suggest that major development would</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish</p>

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		<p>be better located in the above identified sites in the Countryside.</p> <p>Option Site WIG/002: This would be an extension of the current Residential Allocation with managed effect on the environment, particularly if Oadby Civic Society's recommendation under Policy 33 response extends the Oadby and Wigston Green Wedge to the South as far as Newton Lane.</p> <p>Option Sites OAD/006 and OAD/015: These 2 sites together with the possibility of joint collaboration with Harborough DC would be of sufficient size to warrant a comprehensive development plan that would not only include residential provision but also schools and a Local Centre (possibly including a Doctor's surgery). This would enable these sites to be capable of providing the mix of accommodation so badly needed with particular reference for the need for more elderly provision such as flats and bungalows which would only be viable if support facilities were to hand. There is no means of providing additional bungalows close to the existing Town Centres.</p>	<p>background evidence to underpin its approach.</p>
Leicestershire CC 15.05	OAD/006 & OAD/015	<p>As the Lead Local Flood Authority, it is noted that OAD/006 and OAD/015 are within the upstream catchment of the Washbrook.</p> <p>There are properties at risk of flooding from the Washbrook, in Oadby, including significant flooding last summer. OAD/006 has already received a number of planning approvals. If the much larger OAD/015 were to become an allocated site, it would be prudent for local</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>planning policy to include additional requirements for flood alleviation.</p> <p>OAD/015 is not included within the current draft SFRA we have reviewed. We are in contact with OWBC to ensure they consult with us if it is added to the draft.</p>	
Leicester City Council 15.05	OAD/005	<p>Leicester City Council would like to express concern about any potential development of site OAD/005, Land North of Palmerston Way.</p> <p>As we recall, a previous pre-application highlighted several issues with the site including flood risk and access complications. The City Council requests to be kept informed with the progress of this site during the plan production process.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p> <p>The two Authorities can discuss this Site, together with any other cross-boundary matters, as part of the ongoing Duty to Co-operate meetings.</p>
Environment Agency 20.06	OAD/005	<p>Historic Landfill. A small proportion of historic (closed) landfill Land off Leicester Road, Oadby (EAHLD28292) underlies the eastern portion of the red outline.</p> <p>The site should therefore be considered to have a history of potentially contaminating uses. Any planning application submission must include evidence which demonstrates any pollution risk to controlled waters during the construction phase, and for the lifetime of the development, has been investigated and that any necessary remediation will be carried out.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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Environment Agency 20.06	OAD006	<p>Historic Landfill. A large proportion of the Northern part of the site is underlain with historic (closed) landfill Windrush Drive, Oadby (EAHLD28297).</p> <p>The site should therefore be considered to have a history of potentially contaminating uses. Any planning application submission must include evidence which demonstrates any pollution risk to controlled waters during the construction phase, and for the lifetime of the development, has been investigated and that any necessary remediation will be carried out.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Environment Agency 20.06	OAD010	<p>Site underlain by a Secondary A Superficial aquifer and Secondary (undifferentiated) bedrock and is therefore sensitive from a controlled waters perspective.</p> <p>Proposals for the site include a cemetery. When cemeteries are proposed special considerations and guidance needs to be followed regarding the protection of controlled waters: Cemeteries and burials: groundwater risk assessments - GOV.UK (www.gov.uk).</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Environment Agency 20.06	OAD011	<p>Site underlain by a Secondary A Superficial aquifer and Secondary (undifferentiated) bedrock and is therefore sensitive from a controlled waters perspective. Proposals for the site include a cemetery. When cemeteries are proposed special considerations and guidance needs to be followed regarding the protection of controlled waters: Cemeteries and burials: groundwater risk assessments - GOV.UK (www.gov.uk).</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Environment Agency 20.06	OAD014	<p>Flood Zone. The Southern portion of the site is impacted by Flood Zones 2 and 3 and which is associated with the Wash Brook, an ordinary watercourse.</p> <p>Historic Landfill. The Southern edge of the site is underlain with historic (closed) landfill Oadby Civic Amenity Site (EAHLD28304). The site should therefore be considered to have a history of potentially contaminating uses. Any planning application submission must include evidence which demonstrates any pollution risk to controlled waters during the construction phase, and for the lifetime of the development, has been investigated and that any necessary remediation will be carried out.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Environment Agency 20.06	OAD015	<p>This is a cross-boundary site with Harborough District Council. The proposal is for a significant amount of new housing (circa 3,000). There is an ordinary watercourse (the Wash Brook) running through the site. Whilst the latest information available to the Environment Agency shows the site to lie within Flood Zone 1, to have greater certainty of the current flood risk and to ensure development would not pose an increase in flood risk downstream, we would recommend that hydraulic modelling of the ordinary watercourse is undertaken.</p> <p>The Environment Agency has modelled information for the River Sence aspect of the application site (Leicestershire Tributaries (Upper Sence), JBA, 2021). The Environment Agency would request to review any modelling subsequently undertaken.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

Appendix 1 – Wigston Site Options (WIG/001 – WIG/014)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Oadby Civic Society 13.05	WIG/003	<p>Object. Site Options WIG/003, WIG/004, WIG/006, WIG/007, WIG/008, WIG/010</p> <p>Oadby Civic Society is totally opposed to any residential development in a Green Wedge as this contravenes the conditions set out in Policy 33. (see separate response on Policy 33).</p> <p>Sites within the Wigston area that are totally affected by this are: WIG/003, WIG/006, and WIG/010.</p> <p>Sites that are not wholly in the Green Wedge, but fall partly within it and are therefore affected are: WIG/004, WIG/007 and WIG/008.</p> <p>The Society would urge the Council to reject these sites for consideration as future housing development land.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Oadby Civic Society 13.05	WIG/004	<p>Object. Site Options WIG/003, WIG/004, WIG/006, WIG/007, WIG/008, WIG/010</p> <p>Oadby Civic Society is totally opposed to any residential development in a Green Wedge as this contravenes the conditions set out in Policy 33. (see separate response on Policy 33).</p> <p>Sites within the Wigston area that are totally affected by this are: WIG/003, WIG/006, and WIG/010.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>Sites that are not wholly in the Green Wedge, but fall partly within it and are therefore affected are: WIG/004, WIG/007 and WIG/008.</p> <p>The Society would urge the Council to reject these sites for consideration as future housing development land.</p>	
Oadby Civic Society 13.05	WIG/006	<p>Object. Site Options WIG/003, WIG/004, WIG/006, WIG/007, WIG/008, WIG/010</p> <p>Oadby Civic Society is totally opposed to any residential development in a Green Wedge as this contravenes the conditions set out in Policy 33. (see separate response on Policy 33).</p> <p>Sites within the Wigston area that are totally affected by this are: WIG/003, WIG/006, and WIG/010.</p> <p>Sites that are not wholly in the Green Wedge, but fall partly within it and are therefore affected are: WIG/004, WIG/007 and WIG/008.</p> <p>The Society would urge the Council to reject these sites for consideration as future housing development land.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Oadby Civic Society 13.05	WIG/007	<p>Object. Site Options WIG/003, WIG/004, WIG/006, WIG/007, WIG/008, WIG/010</p> <p>Oadby Civic Society is totally opposed to any residential development in a Green Wedge as this contravenes the conditions set out in Policy 33. (see separate response on Policy 33).</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>Sites within the Wigston area that are totally affected by this are: WIG/003, WIG/006, and WIG/010.</p> <p>Sites that are not wholly in the Green Wedge, but fall partly within it and are therefore affected are: WIG/004, WIG/007 and WIG/008.</p> <p>The Society would urge the Council to reject these sites for consideration as future housing development land.</p>	<p>its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Oadby Civic Society 13.05	WIG/008	<p>Object. Site Options WIG/003, WIG/004, WIG/006, WIG/007, WIG/008, WIG/010</p> <p>Oadby Civic Society is totally opposed to any residential development in a Green Wedge as this contravenes the conditions set out in Policy 33. (see separate response on Policy 33).</p> <p>Sites within the Wigston area that are totally affected by this are: WIG/003, WIG/006, and WIG/010.</p> <p>Sites that are not wholly in the Green Wedge, but fall partly within it and are therefore affected are: WIG/004, WIG/007 and WIG/008.</p> <p>The Society would urge the Council to reject these sites for consideration as future housing development land.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Oadby Civic Society 13.05	WIG/010	<p>Object. Site Options WIG/003, WIG/004, WIG/006, WIG/007, WIG/008, WIG/010</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option,</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>Oadby Civic Society is totally opposed to any residential development in a Green Wedge as this contravenes the conditions set out in Policy 33. (see separate response on Policy 33).</p> <p>Sites within the Wigston area that are totally affected by this are: WIG/003, WIG/006, and WIG/010.</p> <p>Sites that are not wholly in the Green Wedge, but fall partly within it and are therefore affected are: WIG/004, WIG/007 and WIG/008.</p> <p>The Society would urge the Council to reject these sites for consideration as future housing development land.</p>	<p>including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Oadby Civic Society 13.05	WIG/002	<p>Site Options OAD/006, OAD/015, WIG/002</p> <p>Oadby Civic Society supports the Policy 33-Green Wedges and the importance of no residential building in the Green Wedges. This puts pressure on sites outside of the Green Wedges for necessary development, regrettably land designated as Countryside.</p> <p>To avoid residential development in the Green Wedges, the Society would suggest that major development would be better located in the above identified sites in the Countryside.</p> <p>Option Site WIG/002: This would be an extension of the current Residential Allocation with managed effect on the environment, particularly if Oadby Civic Society's recommendation under Policy 33 response extends the Oadby and Wigston Green Wedge to the South as far as Newton Lane.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>Option Sites OAD/006 and OAD/015: These 2 sites together with the possibility of joint collaboration with Harborough DC would be of sufficient size to warrant a comprehensive development plan that would not only include residential provision but also schools and a Local Centre (possibly including a Doctor's surgery).</p> <p>This would enable these sites to be capable of providing the mix of accommodation so badly needed with particular reference for the need for more elderly provision such as flats and bungalows which would only be viable if support facilities were to hand. There is no means of providing additional bungalows close to the existing Town Centres.</p>	
Environment Agency 20.06	WIG009	Flood Zone. The Eastern-most portion of the site is affected by Flood Zones 2 and 3.	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Environment Agency 20.06	WIG015	Flood Zone. Moderate sized portions of the site adjacent to the ordinary watercourse are affected by Flood Zones 2 and 3.	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
			its approach. In addition, the Council will publish background evidence to underpin its approach.

Appendix 1 – South Wigston Site Option (SWIG/001)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Environment Agency 20.06	SWIG001	<p>Historic Landfill. According to our records the site is underlain with 2 historic (closed) landfill’s Wigston Landfill (EAHLD28324) and Magna Road, Wigston (EAHLD28323). The site should therefore be considered to have a history of potentially contaminating uses. Any planning application submission must include evidence which demonstrates any pollution risk to controlled waters during the construction phase, and for the lifetime of the development, has been investigated and that any necessary remediation will be carried out.</p> <p>Sites operating with a Permit issued by the Environment Agency. The site is adjacent to: Metal Recycling Site (vehicle dismantler), Nigel Gordon Roe (EA/EPR/WP3193CJ); Household, Commercial & Industrial Waste Transfer Station, Leicester Scrap Processors and Suppliers Limited (EA/EPR/UP3490CD).</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

Appendix 1 – Oadby and Wigston (Cross-Settlement) Site Options (O&W/001 and O&W/002)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Forestry Commission 14.05	O&W/001 and O&W/002	<p>We note that the residential/leisure sites formerly the Glen Course Golf Course has a number of woodlands on site, a few of these (approx. 4.12ha) are lowland mixed deciduous woodland on the Priority Habitat Inventory (England).</p> <p>This recognises that under the UK Biodiversity Action Plan they were recognised as being the most threatened and requiring conservation action. The UK Biodiversity Action Plan has now been superseded by the UK Post-2010 Biodiversity Framework but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 “Duty to conserve and enhance biodiversity” and Sect 41 – “List of habitats and species of principle importance in England”.</p> <p>Fragmentation is one of the greatest threats to lowland mixed deciduous woodland. Woodlands can suffer loss or deterioration from nearby development, from buildings or roads, through damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic. Also from increasing disturbance to wildlife from noise and light pollution. Fragmentation can have a huge negative impact on the ability of the biodiversity (flora and fauna We note that the residential/leisure sites formerly the Glen Course Golf Course has a number of woodlands on site, a few of these (approx. 4.12ha) are lowland mixed deciduous woodland on the Priority Habitat Inventory (England).</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>This recognises that under the UK Biodiversity Action Plan they were recognised as being the most threatened and requiring conservation action. The UK Biodiversity Action Plan has now been superseded by the UK Post-2010 Biodiversity Framework but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 “Duty to conserve and enhance biodiversity” and Sect 41 – “List of habitats and species of principle importance in England”.</p> <p>Fragmentation is) to respond to the impacts of climate change.</p> <p>There would be an opportunity if development were to occur, to join up the fragmented woodlands to perhaps create some larger woodland blocks to ensure maximum gains to increase habitat connectivity and benefit biodiversity across the whole site.</p> <p>We would expect to see careful consideration of any impacts and any weightings which might be applied to any assessment of development on the site.</p>	

Sustainability Appraisal and Habitat Regulations Assessment

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
<p>Natural England</p> <p>Thursday 9th May, 2024</p>	<p>HRA</p>	<p>Support.</p> <p>Natural England welcomes the opportunity to comment on the Habitats Regulations Assessment of the Oadby & Wigston Local Plan.</p> <p>We are satisfied that the Screening Report follows accepted methodology and is in line with appropriate legislation and guidance. We also acknowledge that policies that may have a Likely Significant Effect on a European Site were identified, and an Appropriate Assessment carried out accordingly in relation to disturbance from recreation.</p> <p>Natural England agrees with the conclusion of the HRA that the Local Plan (Preferred Options consultation) will have no adverse effects on the integrity of any Habitat Sites either alone or in combination.</p>	<p>Support welcomed.</p>
<p>Natural England</p> <p>Thursday 9th May, 2024</p>	<p>SA and HRA</p>	<p>In accordance with paragraph 181 of NPPF, the local plans should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the Sustainability Appraisal and Habitat Regulations Assessment, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes.</p>	<p>Noted.</p>

APPENDIX 3 – LOCAL RESIDENTS REPRESENTATIONS (WITH OFFICER RESPONSES)

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General Comments

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Local Resident, 14 th May 2024	Petition to the Draft Local Plan	<p>Manor Road Extension, Oadby - Local Residents Petition to emerging Draft Local Plan (Regulation 18b)</p> <p>Local neighbours to Manor Road Extension - see link - https://chnq.it/TmLmFs7yzZ</p> <p>Text from petition:</p> <p>Halt the Proposed Local Plan in Oadby to Preserve our Green Spaces</p> <p>We, the undersigned residents of Oadby, express our profound concern regarding the proposed housing plans outlined in the document accessible at https://www.oadby-wigston.gov.uk/files/documents/draft_local_plan_reg_18b_preferred_options_document/OWBC%20Reg%2018B%20PO%20Draft%20Local%20Plan%20-%20Spring%202024.pdf</p> <p>Specifically, we are troubled by the potential impact on the Manor Road Extension sites, including OAD/002, OAD/009, OAD/010, and OAD/111, with particular emphasis on Copse Close (OAD/002).</p> <p>We fear that the proposed development poses a significant threat to our community's infrastructure, green spaces, and overall environment.</p> <p>Our green spaces are not only crucial for the preservation of wildlife and biodiversity, including bats and badgers, but also for the health and well-being of our</p>	<p>Noted.</p> <p>At midday, Wednesday 15 May, 2024, number of signatures recorded: 92 people</p> <p>At 07:15, Thursday 9th January, 2025, number of signatures recorded: 1,525 people.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>community. Furthermore, the strain on our already burdened infrastructure may lead to increased traffic congestion on Manor Road Extension and Copse Close, endangering pedestrian safety. Additionally, the lack of sufficient schools and new medical facilities in the area raises concerns about accommodating the influx of new residents.</p> <p>Oadby has long been cherished for its harmonious blend of urban living and nature preservation. However, this delicate balance is now at risk due to the proposed housing plan. Access to green spaces has been shown to significantly contribute to mental health improvement, especially during these challenging times.</p> <p>We call upon the Oadby and Wigston Borough Council to reconsider this proposal, taking into account the concerns of residents who value Oadby's unique character, defined by its green spaces and well-maintained infrastructure.</p> <p>We urge you to join us in safeguarding the future of our community by signing this petition against the proposed housing plan in Oadby.</p> <p>Additionally, we are concerned about the potential effects on our Green policy due to the limited availability of green spaces, loss of biodiversity, and impact on recreational activities. Moreover, there are worries about the increased risk of flooding, as evidenced by incidents such as the flooding on Gartree Road (B582) following the Stoughton Park development. These incidents highlight the need for careful consideration of environmental factors in any development plans.</p>	

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		Thank you for your support in protecting the essence of our community.	
Local Resident, 21 st May 2024	General to housebuilding and taking on Leicester City's unmet need	<p>I am writing to you to express my total objection to these proposals. Oadby and Wigston is already over developed and the impact further development would have on the community, services, the environment and general living conditions is not one that has been thought through and is definitely not wanted. I don't remember this being discussed when the Borough Council were seeking re-election. Your primary obligation is surely to the residents of the Borough. I understand there is no legal requirement to provide this and therefore no obligation so what are the reasons for even suggesting this? As one of the highest taxed Boroughs and certainly not the poorest when you look at the housing stock in the area, it always amazes me that budgets are seen as needing to continually rise. I mention this because I cannot but wonder that the main reason behind this is seen as financial. This is short term when considering what would be lost and never be restored.</p> <p>I will be contacting Neil O'brien to advocate strongly against this short sighted plan. Leicester City have enough brown field sites and with all the city retail closures and no enticement to encourage new brands to the centre these offer plenty of opportunities for conversion of these units into domestic living spaces with minimum cost and as an urban landscape very little change to the environment.</p>	<p>The Council is committed to ensuring that residents of the Borough have access to appropriate local services and facilities. The New Local Plan will be a key factor in ensuring that such facilities and services are realised in the longer term. The Council is also required by Government, to provide new homes that meet local needs. Unmet housing needs from neighbouring local authorities can form part of local housing needs.</p> <p>Paragraph 24 of the National Planning Policy Framework (NPPF) states that 'Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries'. Housing need is a cross boundary matter for all local authority areas within the Leicester and Leicestershire Housing Market Area, therefore cannot be ignored.</p> <p>The NPPF further states at paragraph 26 states that 'effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>Please make sure my objection is logged and counted. As elected officials this is not what your constituents voted for and do not want.</p>	<p>could be met elsewhere’.</p> <p>NPPF paragraph 67 goes onto state that ‘strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment...’.</p> <p>In 2022, Local Authorities within the Leicester and Leicestershire Housing Market Area agreed a Statement of Common Ground (SoCG) in relation to Leicester City’s declared unmet housing and employment needs. As part of this SoCG, the Council agreed the principle of accommodating a portion of Leicester City’s unmet housing need. Unless evidence suggests otherwise, the Council will be required through the SoCG to accommodate a portion of Leicester City’s unmet housing need within the New Local Plan.</p> <p>It is clear from the above, that the Council has a duty to take account of the unmet housing needs of other local authority areas. The ability for the Council to accommodate additional unmet housing needs of neighbouring local authorities will be evidence led. The Council has prepared the necessary evidence, which has informed the Regulation 19 Pre-Submission Draft Plan.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Local Resident, 13 th May 2024	General to housebuilding, taking on Leicester City's unmet need and the green wedge	<p>I am writing to express my concerns regarding the Regulation 18B preferred options for the Oadby and Wigston local plan. This plan, as it stands, threatens to systematically eradicate green spaces and countryside in and around Oadby, with long-lasting negative implications for the area's character. Of particular concern is the proposal to fill the gap between Oadby and Wigston with housing developments, as well as the extensive development planned around the edges of Oadby.</p> <p>The communication regarding this plan has been severely lacking, to the extent that many residents of Oadby remain unaware of its gravity and importance. I strongly urge an extension of the consultation period to facilitate proper communication, including leaflet drops and emails to residents of Oadby and Wigston.</p> <p>Furthermore, the premise upon which the house building aspect of this plan is built is flawed. A significant portion of the proposed 5,040 homes for Oadby and Wigston over the next 21 years are not intended to meet local needs. Rather, they result from the council's decision to accept overspill housing from Leicester city, despite the absence of a legal requirement to do so. Moreover, there are numerous derelict brownfield sites within the city of Leicester that have yet to be explored for development potential.</p> <p>My objections pertain specifically to the areas designated as Oad/002, Oad/009, Oad/010, and Oad/111, which form part of the Oadby portion of the Oadby, Thurnby, and Stoughton green wedge. As outlined in Policy 33, green wedges are vital green spaces within the Borough. The green wedge in Oadby serves several important functions, including preventing the merging of Oadby with Leicester and providing a crucial link in the Borough's</p>	<p>The Council is committed to ensuring that residents of the Borough have access to appropriate local services and facilities. The New Local Plan will be a key factor in ensuring that such facilities and services are realised in the longer term. The Council is also required by Government, to provide new homes that meet local needs. Unmet housing needs from neighbouring local authorities can form part of local housing needs.</p> <p>Paragraph 24 of the National Planning Policy Framework (NPPF) states that '<i>Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries</i>'. Housing need is a cross boundary matter for all local authority areas within the Leicester and Leicestershire Housing Market Area, therefore cannot be ignored.</p> <p>The NPPF further states at paragraph 26 states that '<i>effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere</i>'.</p> <p>NPPF paragraph 67 goes onto state that '<i>strategic policy-making authorities should establish a housing</i></p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>green infrastructure network.</p> <p>Policy 33 commits to retaining these areas as open and undeveloped. However, the proposed site allocations listed above directly contradict this commitment, as they comprise the majority of the green wedge. The preferred options outlined in the Regulation 18B local plan would effectively decimate this green wedge, with only the university playing fields remaining untouched. This would have profoundly negative repercussions for the local area.</p> <p>These playing fields serve as an essential green area, providing recreational space for walkers, runners, and wildlife enthusiasts. They are home to a diverse range of species, and their destruction would represent a significant loss to the biodiversity and character of Oadby.</p> <p>In conclusion, I strongly object to the proposed options outlined in the Regulation 18B preferred plan for Oadby and Wigston. I urge the council to reconsider these plans and to prioritize the preservation of green spaces and countryside for the benefit of current and future generations.</p>	<p><i>requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment...’.</i></p> <p>In 2022, Local Authorities within the Leicester and Leicestershire Housing Market Area agreed a Statement of Common Ground (SoCG) in relation to Leicester City’s declared unmet housing and employment needs. As part of this SoCG, the Council agreed the principle of accommodating a portion of Leicester City’s unmet housing need. Unless evidence suggests otherwise, the Council will be required through the SoCG to accommodate a portion of Leicester City’s unmet housing need within the New Local Plan.</p> <p>It is clear from the above, that the Council has a duty to take account of the unmet housing needs of other local authority areas. The ability for the Council to accommodate additional unmet housing needs of neighbouring local authorities will be evidence led. The Council has prepared the necessary evidence, which has informed the Regulation 19 Pre-Submission Draft Plan.</p>
Local Resident, 20 th May 2024	General to housebuilding on currently	I am writing with concern following release of details of potential sites for housing development in the Borough.	The Council is committed to ensuring that residents of the Borough have access to appropriate local services and facilities. The New Local Plan will be a key factor

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	designated green wedge and taking on Leciester City's unmet need	<p>I note with dismay that approximately 1000 homes are to be built as Leicester City Council cannot fulfil their obligations. I understand their is no legal requirement to do so. Why accept this when open space and countryside is a stretched resource as it is? Oadby and Wigston risks becoming only a mere urban suburb of Leicester, losing its character as Borough with mixed land use.</p> <p>I write with particular concern for the proposed sites which, if developed, would join Oadby and Wigston together, disregarding the provisions of the green wedge in earlier Local Plans. Such development would strangle Brocks Hill Country Park from existing countryside in the Borough, impacting the fauna present, possibly degrading a valuable natural resource. What impact study has been completed in this respect? Not only are they a link for wildlife from Brocks Hill to the wider rural countryside, the fields concerned are used for leisure and recreation, providing a link to Brocks Hill, the Grand Union Canal and Wistow. To build on these would change the character forever. The nature of the landscape is already being challenged by developed to the south of Newton Lane and North of the golf course.</p> <p>I look forward to following as plans develop and such considerations above being taken into account.</p>	<p>in ensuring that such facilities and services are realised in the longer term. The Council is also required by Government, to provide new homes that meet local needs. Unmet housing needs from neighbouring local authorities can form part of local housing needs.</p> <p>Paragraph 24 of the National Planning Policy Framework (NPPF) states that <i>'Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries'</i>. Housing need is a cross boundary matter for all local authority areas within the Leicester and Leicestershire Housing Market Area, therefore cannot be ignored.</p> <p>The NPPF further states at paragraph 26 states that <i>'effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere'</i>.</p> <p>NPPF paragraph 67 goes onto state that <i>'strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing</i></p>

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			<p><i>need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment...’.</i></p> <p>In 2022, Local Authorities within the Leicester and Leicestershire Housing Market Area agreed a Statement of Common Ground (SoCG) in relation to Leicester City’s declared unmet housing and employment needs. As part of this SoCG, the Council agreed the principle of accommodating a portion of Leicester City’s unmet housing need. Unless evidence suggests otherwise, the Council will be required through the SoCG to accommodate a portion of Leicester City’s unmet housing need within the New Local Plan.</p> <p>It is clear from the above, that the Council has a duty to take account of the unmet housing needs of other local authority areas. The ability for the Council to accommodate additional unmet housing needs of neighbouring local authorities will be evidence led. The Council has prepared the necessary evidence, which has informed the Regulation 19 Pre-Submission Draft Plan.</p> <p>The Council has commissioned a Phase 1 Habitat Survey.</p>
Local Resident, 20 th May 2024	General to housebuilding	Why are the council intending to build more houses in our borough. For a start the road structure cannot support the amount of cars in the area now. The schools are full to bursting and from the plans it looks like there is no plan to expand or build more. We need more green spaces not more houses.	Under the Government’s objective to significantly boost the supply of homes, the Council is required by Government to provide new homes that meet local needs.

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			<p>Paragraph 61 of the National Planning Policy Framework (NPPF 2023), states that <i>'To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area'</i>.</p> <p>The Leicester & Leicestershire Housing & Economic Needs Assessment (HENA 2022) was commissioned by all of the local authorities in Leicestershire to inform preparation of local plans across the region. This document is the evidence base outlining Oadby and Wigston Borough Council's housing need, economic growth and employment land needs for the new Local Plan period.</p>
Local Resident, 7 th May 2024	General to housebuilding	<p>ONS Household numbers for O&W show 21003 for 2020 and 22753 for 2041 i.e. an increase of 1750.</p> <p>Houses to accommodate these 1750 households have probably already been built since 2020 taking account of developments at Stoughton Grange, Cottage Farm and in Wigston.</p> <p>Therefore, there is no need to build on car parks, good agricultural land or anywhere else.</p> <p>There is also no need to accept overspill from Leicester as there are plenty of brown field sites there.</p>	<p>The Council is committed to ensuring that residents of the Borough have access to appropriate local services and facilities. The New Local Plan will be a key factor in ensuring that such facilities and services are realised in the longer term. The Council is also required by Government, to provide new homes that meet local needs. Unmet housing needs from neighbouring local authorities can form part of local housing needs.</p> <p>Paragraph 24 of the National Planning Policy Framework (NPPF) states that <i>'Local planning authorities and county councils (in two-tier areas) are</i></p>

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			<p><i>under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries'. Housing need is a cross boundary matter for all local authority areas within the Leicester and Leicestershire Housing Market Area, therefore cannot be ignored.</i></p> <p><i>The NPPF further states at paragraph 26 states that 'effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere'.</i></p> <p><i>NPPF paragraph 67 goes onto state that 'strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment...'</i></p> <p><i>In 2022, Local Authorities within the Leicester and Leicestershire Housing Market Area agreed a Statement of Common Ground (SoCG) in relation to Leicester City's declared unmet housing and employment needs. As part of this SoCG, the Council</i></p>

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			<p>agreed the principle of accommodating a portion of Leicester City's unmet housing need. Unless evidence suggests otherwise, the Council will be required through the SoCG to accommodate a portion of Leicester City's unmet housing need within the New Local Plan.</p> <p>It is clear from the above, that the Council has a duty to take account of the unmet housing needs of other local authority areas. The ability for the Council to accommodate additional unmet housing needs of neighbouring local authorities will be evidence led. The Council has prepared the necessary evidence, which has informed the Regulation 19 Pre-Submission Draft Plan.</p>
Local Resident, 13 th May 2024	General to housebuilding	I was devastated to learn about the Council's plan to build on the green wedge between Oadby and Wigston. This contravenes to the Council's long standing commitment to preserve the green wedge, consequently my wife and I would like to register or opposition to the scheme. We were also disappointed to learn that there are plans to build on the public car parks in Wigston. This will continue to drive shoppers to Fosse park to the detriment of our local retail facilities.	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 2 nd May 2024	General to housebuilding	<p>Our views:</p> <ol style="list-style-type: none"> 1. We STRONGLY object to the plans and all policies under this consultation. 2. As residents of Oadby, we do NOT want anymore houses built on our lovely countryside. You have already 	<p>Under the Government's objective to significantly boost the supply of homes, the Council is required by Government to provide new homes that meet local needs.</p> <p>Paragraph 61 of the National Planning Policy Framework (NPPF 2023), states that '<i>To determine the</i></p>

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		<p>built a huge estate on the boarder of Oadby and Great Glen and this is enough.</p> <p>3. We strongly object on environmental grounds. We need to protect our countryside, not further pollute our environment by building more houses.</p> <p>4. We strongly object on the basis that we already do not have the infrastructure in Oadby to cope with more people and houses. You already cannot get a GP appointment or a school place for the numbers we already have living here.</p> <p>5. We really wanted our children to grow up near the countryside. On one hand you want to plant more trees to help the environment and on the other, destroy our countryside. Such a contradiction.</p> <p>On a personal note, we are appalled by the management at Oadby and Wigston borough council and feel let down by your actions and management over the last few years. Not only have you introduced car park charges, you've now increased them. You have other 'consultations' to reduce waste disposal amongst many other disappointing decisions that have been made. All of this decline is a direct result of mismanagement at the council due to a deficit created by employment tribunal payouts and now you want to further destroy our wonderful area by building thousands of houses. We are so disappointed.</p>	<p><i>minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area'.</i></p> <p>The Leicester & Leicestershire Housing & Economic Needs Assessment (HENA 2022) was commissioned by all of the local authorities in Leicestershire to inform preparation of local plans across the region. This document is the evidence base outlining Oadby and Wigston Borough Council's housing need, economic growth and employment land needs for the new Local Plan period.</p>
Local Resident, 11 th May 2024	General to housebuilding	I am generally supportive of more housing in the District but with greater emphasis on smaller housing for first time buyers and the next step up in the housing ladder. In my opinion there has been too much emphasis on detached housing, partly as means of subsidising affordable housing. I would prefer to see more developments comprising principally well styled town houses, semi detached houses and bungalows (including	Plan contains a number of policies that will influence the design of new residential areas.

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		<p>specialist retirement schemes), even if this means sacrificing some of the affordable housing. Over time decent sized semi detached houses have proved to provide good homes from first purchase through to retirement at a reasonable purchase price and a reasonable running cost.</p> <p>Communal car parking areas set away from the housing should be avoided. They become neglected and are not used for the originally intended purpose. Jelson Homes did a lot of these in the 1970's and 50 years on they are a poorly maintained and generally a mess. There are good examples at the end of Creaton Road and adjoining the footpath from the end of Creaton Road through to Alport way.</p> <p>The upside of the Meadow Way/Kelmarsh Avenue area is the ample open space for children to play and for adults to walk, away from the spine roads and through the development. More recent developments have sacrificed space for higher density but at a cost of the fitness and well being of the residence. The difference between the Meadow Way development and the new developments off Newton Lane is stark.</p> <p>Flat developments will have communal landscaping and car parking which needs to be properly managed. Development should be conditional on the transfer of the freehold by the developer to a management company that is owned by the buyers of the flats. If the flats are sold on say 99 year renewable leases so the value of the owners flat is protected, and the owners have a vested interest in maintaining the common areas. The managing</p>	

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		<p>agent is then appointed/reappointed by the flat owners at the AGM of the management company.</p> <p>As far as roads and communal areas are concerned I firmly believe it should be the responsibility of the County Highways and the District Council to maintain these and not divest the role to private management companies.</p> <p>I accept there is a need for more housing in the District and it is logical for some of it to be in the valley either side of Newton Lane. However I do believe it is important to maintain an area of separation between Oadby and Wigston, avoiding development of the higher ground to the south of the Brocks Hill County Park and in a westerly direction to the south of Gartree High School.</p>	
Local Resident, 13 th May 2024	General to housebuilding	<p>1. The proposed massive increase in the number of new homes included in the plan some six thousand is far in excess of the already bursting infrastructure i.e. roads, schools, doctors, dentists and leisure facilities. The proposal to build on all the main car parks and gaps between Oadby & Wigston would merely turn the whole area into a dormitory town.</p> <p>2. The density of development with two and three storey properties on ridiculously small plots with gardens so small that planting trees or parking cars becomes virtually impossible provides nothing for the occupants merely bigger profits for the contractors.</p> <p>Whilst I appreciate we need more housing and new homes stimulates the economy, people buying new carpets, curtains and the like the quality of life for people after the builder has moved off site should also be a paramount consideration. I would ask that the current</p>	<p>The Council is committed to ensuring that residents of the Borough have access to appropriate local services and facilities. The New Local Plan will be a key factor in ensuring that such facilities and services are realised in the longer term. The Council is also required by Government, to provide new homes that meet local needs. Unmet housing needs from neighbouring local authorities can form part of local housing needs.</p> <p>Paragraph 24 of the National Planning Policy Framework (NPPF) states that <i>'Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries'</i>. Housing need is a</p>

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		<p>density be reduced from the new Meadows development off of Newton Lane. Six thousand houses is too much and Leicester City Council should not be expecting O&W to take the one thousand plus homes which they say cannot accommodate.</p> <p>Leicester city like many other cities is fast becoming a ghost town with major shops closing, the city, if it has a future may have to become a centre for leisure and for people that want to live close to the cafes and bars etc., the younger generation they should concentrate on building quality homes on brown field sites, converting the many vacant shops in to homes. They should use more imagination and not just expect O&W to burden their responsibility.</p> <p>3. Parklands at Oadby is a wonderful facility and although I do not use the sport's facilities I enjoy the walks. The car park is very often full which shows how much the people of O&W make use of the facility. Imagine a further six thousand homes and what chance you could ever stand of parking or using the facilities. To accommodate the massive expansion planned for Wigston I would like to see Parklands Oadby connected by a wide grass area with trees, a play area, small lake, nature ramble area etc., an extension to Parklands connecting Newton Lane, Wigston. Give something back to Wigston make it a place where people want to live. It may mean moving the proposed development one field further out, but surely the benefits would provide the borough with a marvellous asset.</p> <p>The Parklands extension could be financed by being a requirement when planning consent is given to contractors to contribute towards its initial cost. A cafe on the site similar to the one at Parklands could also help</p>	<p>cross boundary matter for all local authority areas within the Leicester and Leicestershire Housing Market Area, therefore cannot be ignored.</p> <p>The NPPF further states at paragraph 26 states that <i>'effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere'</i>.</p> <p>NPPF paragraph 67 goes onto state that <i>'strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment...'</i></p> <p>In 2022, Local Authorities within the Leicester and Leicestershire Housing Market Area agreed a Statement of Common Ground (SoCG) in relation to Leicester City's declared unmet housing and employment needs. As part of this SoCG, the Council agreed the principle of accommodating a portion of Leicester City's unmet housing need. Unless evidence suggests otherwise, the Council will be required</p>

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		<p>finance a portion of the cost and fees from a car park and council tax on the cafe plus, maybe grants could help with maintenance. Take a trip to Market Harborough and have a walk though Welland Park, see how the people of Market Harborough and surrounding towns and villages will travel to enjoy a wonderful facility and make Market Harborough a place where people want live, don't turn Oadby and Wigston into one big housing estate with roads choked with polluting queuing traffic.</p> <p>4. It would seem that the development linking Oadby & Wigston would be better started from the Oadby side as construction traffic on the narrow Newton Lane causes major problems. The current new Meadows development has already caused Meadow Way to be used as a rat run race track with cars travelling at excessive speeds. On the other hand the Oadby end of the proposed development is served by a dual carriageway linked to the ring road.</p> <p>In summary Just in case my comments are viewed as just some old seventy five year old NIMBY I will probably never see the the development completed and where I live I will not see the new development, neither do I back onto open country side earmarked for development I merely would like to see O&W remain a place where people want to live as I have done all of my life and would like to think my grandchildren would feel the same.</p>	<p>through the SoCG to accommodate a portion of Leicester City's unmet housing need within the New Local Plan.</p> <p>It is clear from the above, that the Council has a duty to take account of the unmet housing needs of other local authority areas. The ability for the Council to accommodate additional unmet housing needs of neighbouring local authorities will be evidence led. The Council has prepared the necessary evidence, which has informed the Regulation 19 Pre-Submission Draft Plan.</p>
Local Resident, 7 th May 2025	General comment	Council tax UP! Business rates UP! Parking charges UP! Business closures in Oadby & Wigston UP!	The Council is committed to ensuring that residents of the Borough have access to appropriate local services and facilities. The New Local Plan will be a key factor in ensuring that such facilities and services are

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		<p>Harassment of local car mechanics (Little Dale Rd) UP!</p> <p>Bin collections (soon to be) DOWN! Maintenance of green spaces DOWN!</p> <p>And soon, courtesy of YOUR vote to accept overspill housing from The City of Leicester...</p> <p>Local farming (food supply) output DOWN! Local wildlife habitat DOWN! The quality of life in Oadby & Wigston DOWN! Access to parking and what remains of the Oadby & Wigston high streets DOWN!</p> <p>Your acceptance of City of Leicester housing is a new low. And, given the increasingly abject rate of return being provided to the residents of Oadby and Wigston, an especially unintelligent move on your part.</p> <p>And I say this as someone who is trying to help you here!</p> <p>Unless you actually want to go down in local history as THE Council that ruined Oadby & Wigston, and unless you actually want to be turfed out of office, I strongly suggest, for everybody's benefit (yours and ours) that you reverse course on both the overspill housing and your hitherto attitude towards taxing and spending other people's money.</p>	<p>realised in the longer term. The Council is also required by Government, to provide new homes that meet local needs. Unmet housing needs from neighbouring local authorities can form part of local housing needs.</p> <p>Paragraph 24 of the National Planning Policy Framework (NPPF) states that <i>'Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries'</i>. Housing need is a cross boundary matter for all local authority areas within the Leicester and Leicestershire Housing Market Area, therefore cannot be ignored.</p> <p>The NPPF further states at paragraph 26 states that <i>'effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere'</i>.</p> <p>NPPF paragraph 67 goes onto state that <i>'strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for</i></p>

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			<p><i>neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment...’.</i></p> <p>In 2022, Local Authorities within the Leicester and Leicestershire Housing Market Area agreed a Statement of Common Ground (SoCG) in relation to Leicester City’s declared unmet housing and employment needs. As part of this SoCG, the Council agreed the principle of accommodating a portion of Leicester City’s unmet housing need. Unless evidence suggests otherwise, the Council will be required through the SoCG to accommodate a portion of Leicester City’s unmet housing need within the New Local Plan.</p> <p>It is clear from the above, that the Council has a duty to take account of the unmet housing needs of other local authority areas. The ability for the Council to accommodate additional unmet housing needs of neighbouring local authorities will be evidence led. The Council has prepared the necessary evidence, which has informed the Regulation 19 Pre-Submission Draft Plan.</p>
Local Resident, 14 th May 2024	General to housebuilding and infrastructure	<p>Re local plan</p> <p>I disagree with the local plan as there is no provision to make any new build to have compulsory energy efficient with solar panels and water recycling, plus transportation links and road network needs . There is no provision for Green spaces, allotments or parks and cycling routes. You say doctors and schools will be provided but never are and the existing traffic problems around existing schools will be made worse. As the existing council carparks are part of the plan it will only be detrimental to</p>	<p>Comment noted.</p> <p>The Council is committed to ensuring that residents of the Borough have access to appropriate local services and facilities. The New Local Plan will be a key factor in ensuring that such facilities and services are realised in the longer term.</p> <p>Regulation 18B policies 8, 22 and 30 discuss renewable and low carbon energy, open space,</p>

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		the Town centre's with more business leaving so people will have to travel further afield to shop	outdoor sport and recreational facilities, and green and blue infrastructure.
Local Resident, 15 th May 2024	New Local Plan Reg18B	General objection to New Oadby and Wigston Local Plan Reg18B.	Noted.
Local Resident, 12 th May 2024	Strategic Growth Plan	General: The Strategic Growth Plan was approved in 2018. This may need to be revisited. Wigston and Oadby Borough Council is one of the smallest councils by area in the country. The restrictions of its current boundaries presents difficulties in accommodating more development. Representations need to be made to strategic partners (and government) about the difficulties presented by boundary constraints.	Noted.
Local Resident, 13 th May 2024	General to development (housebuilding and infrastructure)	We are opposed to much of the development plans as the local infrastructure is already encountering problems; from congested road networks (especially at "key" times, ie. rush hour and school times), to GP surgeries all offering poor service due to the amount of people using the facilities, schools are over-subscribed, also the loss of green-field space and impact to natural wildlife/ecology, plus the loss of parking in Oadby which has already brought local retailers to the point of extinction and the parade being no more than a few charity shops, barbers and nail bars.	Noted.
Local Resident, 1 st May 2024	General to housebuilding in Town centres	I recently seen plans to build new housing in Wigston. I think its a great idea. You should build multistory modern flats behind sainsburys Wigston carparks, but create also a multi-storey carpark to make up for the lost spaces. This would also create more footfall and a more appealing area to park our cars. Currently the carparks are a state, mismatched and not very accessible (particularly walking between sainsburys and B&M carparks.	Noted.

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		I am sure these plans would be better received than building more on green belt land.	
Local Resident, 14 th May 2024	General	<p>I'm writing to you in objection to the recent council's plan for the borough. I'm fully convinced that this plan is disadvantageous to every citizen of Oadby and Wigston.</p> <p>I would like firstly to point out that the council has agreed to take on over 1,000 extra houses from Leicester city, which I was told is not a legal requirement. If that is the case it was a decision going directly against the wishes of the local residents.</p> <p>The plans remove almost entirely two important elements – car parks and green spaces. Oadby village has been deeply affected by the car park charges and now any life in the centre of Oadby will disappear entirely with little to no space to park. It will also make it more dangerous for pedestrians as people who still choose to go to Oadby village will need to park on the residential streets.</p> <p>Should this plan go ahead there will be almost no green areas left within Oadby and Wigston borough. I cannot understand how are we to combat global warming, while we allow more fields and woods to be turned into residential areas. Especially considering some of the areas allocated for building are well established green areas, with plenty of wildlife living there.</p> <p>Net zero is now a legal requirement. If we are to achieve that we need to stop building houses on grazing fields. We are not doing nearly enough to protect the green areas – instead this council has opted in to destroying more of it, by accepting extra housing requirements. We</p>	<p>The Council is committed to ensuring that residents of the Borough have access to appropriate local services and facilities. The New Local Plan will be a key factor in ensuring that such facilities and services are realised in the longer term. The Council is also required by Government, to provide new homes that meet local needs. Unmet housing needs from neighbouring local authorities can form part of local housing needs.</p> <p>Paragraph 24 of the National Planning Policy Framework (NPPF) states that '<i>Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries</i>'. Housing need is a cross boundary matter for all local authority areas within the Leicester and Leicestershire Housing Market Area, therefore cannot be ignored.</p> <p>The NPPF further states at paragraph 26 states that '<i>effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere</i>'.</p>

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		<p>should be trying to do preserve the green areas we have.</p> <p>The proposed council plans, outlines affordable housing - In one of the recent areas that was developed - Cottage farm by Bloor Homes - the prices are upwards of £300,000. This is not an affordable price for vast majority of our nation, and the proposed will not be any different.</p> <p>Current infrastructure of the borough are already at the breaking point. There are not enough schools, GPs or aforementioned car parks. No specifics are mentioned if the required services will be added to accommodate such a substantial increase in citizens.</p> <p>Lastly I remember in late 2022 early 2023 when there was a public forum about Oadby Grange development, councillor Samia Haq stated that she would, and I quote 'fight tooth and nail' against the proposal by Mulberry Homes. Now I can see that she signed her name under a plan that would submit not only Oadby Grange but also surrounding fields to the residential development.</p> <p>For the reasons above I am strongly objecting to the current local plan.</p>	<p>NPPF paragraph 67 goes onto state that '<i>strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment...</i>'.</p> <p>In 2022, Local Authorities within the Leicester and Leicestershire Housing Market Area agreed a Statement of Common Ground (SoCG) in relation to Leicester City's declared unmet housing and employment needs. As part of this SoCG, the Council agreed the principle of accommodating a portion of Leicester City's unmet housing need. Unless evidence suggests otherwise, the Council will be required through the SoCG to accommodate a portion of Leicester City's unmet housing need within the New Local Plan.</p> <p>It is clear from the above, that the Council has a duty to take account of the unmet housing needs of other local authority areas. The ability for the Council to accommodate additional unmet housing needs of neighbouring local authorities will be evidence led. The Council has prepared the necessary evidence, which has informed the Regulation 19 Pre-Submission Draft Plan.</p>

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Local Resident, 15 th May 2024	General to housebuilding in Oadby / general to flooding from developments	<p>All of the fields surrounding Oadby that you are proposing could be built on were saturated beyond capacity as recently as January this year. The ground was so saturated it caused more flooding of roads and houses than at any other time in my 35 years living in Oadby. If you build on any more of these sites how much worse will it be next time?</p> <p>Of particular concern is the Wash Brook, over the last two years it has regularly overtopped into gardens on Wigston Road. There is not satisfactory action taking to make sure the brooks banks are maintained properly or that that maintenance is not causing problems for other people up or down stream. I am also very concerned by the impact of clearing work taken next to the washbrook near parklands and believe that any building on that land will affect the absorbtion of rain water in havy downpours. To tarmac over any of that land would cause major problems for residents upstream.</p> <p>Also building more houses in oadby before building extra roads would be a very porr decision. Please send your council representatives to drive around oadby at school pick up time or from oadby, through stouhgton road to shady lane, and past the general. These roads cannot cope with the massive developments you have already allowed. Roads first then development!!!</p>	<p>Comment noted.</p> <p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 1 st May 2024	General to housebuilding and infrastructure	<p>Dear Sirs, I hope you study carefully the proposed planning of extensive housing developments in Oadby especially. We need all the green space we have to be maintained as is for as long as possible. Too many more houses with no infrastructure whatsoever will cause mayhem to all concerned but especially the wild life. I hope you agree to not building on every spare piece of</p>	<p>Policies in Chapter 10 discuss the Council's approach to green and blue infrastructure and protecting biodiversity. The Government's Biodiversity Net Gain strategy also requires developers to increase a site's existing biodiversity value by 10%.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>green space which apparently include the car parks!! nature reserves and every bit of breathable land that is left. Think very carefully otherwise Oadby will be simply consumed into Leicester city which has slowly gone downhill over the last 50 years. The centre of Oadby has hardly any shops and if the car parks disappear no-one will go there so eventually all the shops will disappear and Oadby will become nothing but houses everywhere with people living like rats in cages. You can make it a desirable area with correct planning so please make sure you consider very carefully before sending in the bulldozers to dig up the green spaces.</p>	
<p>Local Resident, 15th May 2024</p>	<p>General to housebuilding</p>	<p>I currently live on the Wigston Meadows and am saddened to hear of the potential plan to build houses on all the green areas around here. Houses do not need to be built on the fields between Wigston and Oadby! These areas are lovely to get out in for a walk, to clear the head and protect individuals' mental health. It's nice to still see farmers using these and for nature to still be here! No more housing is needed. If the city needs more housing then why can't they build more flat blocks etc in the city. People live in this area to stay as far out of the city as possible, but if you continue to build houses on the fields around here, we'll be getting closer to the city, which I know people do not want.</p> <p>I hope this decision is thought through carefully and the actual residents who live here are thought of!</p>	<p>Noted.</p>
<p>Local Resident, 2nd May 2024</p>	<p>General to housebuilding</p>	<p>I strongly object to this plan :</p>	<p>The Council is committed to ensuring that residents of the Borough have access to appropriate local services and facilities. The New Local Plan will be a key factor</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>It seems every bit of green space in Oadby and Wigston is earmarked for development</p> <p>Oadby and Wigston is already full of development and not supported with Schools, Doctors, Effective bus service</p> <p>Some of the land indicated is owned by other organisations eg Co-op and not within the boundary of Oadby</p> <p>I understand over 1000 homes planned are not for local need but as a result of the Council voting to accept overspill housing from the City of Leicester. There is no legal requirement to take on this extra housing</p> <p>More brownfield sites should be used and building upwards</p> <p>The document states up to 6000 new homes to be built – this is far too many for the current schools and infrastructure</p> <p>It seems the main car parks are affected and the green space between Oadby and Wigston and Oadby and the countryside – indeed there would be development all around Oadby</p> <p>I strongly object to this plan for Oadby and Wigston, especially in Oadby as stated above. I am very surprised the council has made this proposal</p> <p>I should be happy to discuss my response in more detail</p>	<p>in ensuring that such facilities and services are realised in the longer term. The Council is also required by Government, to provide new homes that meet local needs. Unmet housing needs from neighbouring local authorities can form part of local housing needs.</p> <p>Paragraph 24 of the National Planning Policy Framework (NPPF) states that <i>‘Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries’</i>. Housing need is a cross boundary matter for all local authority areas within the Leicester and Leicestershire Housing Market Area, therefore cannot be ignored.</p> <p>The NPPF further states at paragraph 26 states that <i>‘effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere’</i>.</p> <p>NPPF paragraph 67 goes on to state that <i>‘strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing</i></p>

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			<p><i>need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment...’.</i></p> <p>In 2022, Local Authorities within the Leicester and Leicestershire Housing Market Area agreed a Statement of Common Ground (SoCG) in relation to Leicester City’s declared unmet housing and employment needs. As part of this SoCG, the Council agreed the principle of accommodating a portion of Leicester City’s unmet housing need. Unless evidence suggests otherwise, the Council will be required through the SoCG to accommodate a portion of Leicester City’s unmet housing need within the New Local Plan.</p> <p>It is clear from the above, that the Council has a duty to take account of the unmet housing needs of other local authority areas. The ability for the Council to accommodate additional unmet housing needs of neighbouring local authorities will be evidence led. The Council has prepared the necessary evidence, which has informed the Regulation 19 Pre-Submission Draft Plan.</p>
Local Resident, 6 th May 2024	General to development on Town Centre / car park Site Options	<p>Town Centre Site Options</p> <p>Objection</p> <p>No building should take place on the town’s car parks. If we have to have more homes then the new residents should be encouraged to shop locally therefore the town centre car parks will be even more important.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for</p>

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			its approach. In addition, the Council will publish background evidence to underpin its approach.
Local Resident, 15 th May 2024	General to development on Town Centre / car park Site Options	<p>Town Centre Site Options</p> <p>Objection</p> <p>I strongly object to the proposed new planning of homes to be built on existing car parks in wigston and also the proposed new dwellings in the wigston area.</p> <p>The reason I object is that we need the car parks to bring customers to the wigston area and also any further dwellings will impact on the facilities already in place.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

Chapter 1 – Introduction

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Local Resident, 14 th May 2024	Introduction Paras: 1.4.4 1.4.9 1.6.1 1.6.2 Corporate Objectives	<p>Introduction</p> <p>General Comment</p> <p>1.1. The 2021 18A Issues and Options had a brilliant sentence in the introduction at para 1.4.: “.....<i>the Council is seeking to ensure that there is a balanced strategy that encourages sustainable development and growth across the Borough area, whilst helping to tackle climate change and protecting those areas that most need it.</i>” That was the most important statement for the whole set of documents, the highlighted part being the most vital. We can’t find it anywhere in the current 18B version. Bring it back as close to the first paras as meaningfully possible. The Council needs to stand up, proudly, by setting the aim of the Local Plan to achieve that balance as so clearly stated.</p> <p>1.2. Current para 1.4.4.is poor since it makes no reference at all to climate change and protecting those areas that most need it. There is nil balance between the conflicting challenges of growth versus protecting those areas that most need it, as in the 18A sentence quoted above. Since this section is ‘setting out the stall’ for the overall plan, this para needs amending to ensure there is a balanced statement of intent. Otherwise those areas that most need protection are left at risk of being lost either when site proposals are assessed, or through challenge of any site refusal.</p> <p>1.3. Current para 1.4.9. fails to reference that any growth area will need to satisfy the requirements set out in Chapter</p>	<p>Having considered the suggestion, the Council has made some, but not all, changes. Where it has not taken on the suggestion, this is because the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.</p> <p>The Council has no statutory duty to consult on the Spatial Objectives as they are decided on a corporate level. Spatial Objective 10, Climate change, discussed the need to mitigate and adapt to climate change, and Spatial Objective 12, Conserving and enhancing green and blue infrastructure discusses the natural environment and landscape. Leicestershire County Council are the lead authority for the Local Nature Recovery Strategy. This document will be subject to public consultation as and when it evolves. Additionally, Oadby and Wigston Borough Council has published its Climate Change Strategy 2024.</p>

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		<p>5 Climate Change Policies, and the Chapter 10 Policies 30-36 protecting the natural environment.</p> <p>1.2. SA/SEA and HRA paras 1.6.1 and 1.6.2. It's important to point out that with each new Local Plan the SA/SEA and habitats assessments are ever more watered down and ineffective. It's ridiculous that the HRA now only looks at only European designated sites: locally important sites disappeared from assessments long ago, followed by regionally important sites, then Nationally designated SSSIs and SINCs. Re Environmental assets the SA also only looks @ national and local sites for biodiversity and geodiveristy. Means most of the Borough's natural assets are totally ignored. From our point of view that means it isn't an assessment of sustainability at all, but instead appears to give free reign for almost any site to be deemed by the SA as ok for 'presumed development'. (see separate comments on LUC SA Report). We see this as an indictment of the bodies that should be protecting habitats, especially Natural England.</p> <p>1.3. Corporate Objectives. We can't remember seeing a public consultation on the Corporate Objectives. We view it as shameful that there isn't an objective dedicated to mitigating climate change and protecting the natural environment. Since the 3 quoted objectives only apply to 2024, presumably there will be a review and updated objectives. Will there be public consultation? Will there be an objective re climate change and environmental protection?</p>	

Chapter 2 – Spatial Portrait

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Local Resident, 14 th May 2024	Spatial Portrait	<p>Spatial Portrait</p> <p>General comment and support for para 2.1.4</p> <p>2.1. Good acknowledgement of local characteristic in final sentence of para 2.1.4. Para 2.1.4.</p> <p>2.2. Please amend 2.5.2. by adding in explicit reference to ‘...parks and Local Green Spaces.’ as opposed to the current ‘...parks and open spaces.’ The para should reflect the designated status and protection in the wording of Policy 32, in line with the references to Brockshill and the Green Wedges.</p>	The Council has made the suggested change.

Chapter 3 – Vision and Values

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Local Resident, 14 th May 2024	Vision and spatial objectives, particularly: Objectives 10,11,12,13 and 14	<p>Vision and Spatial Objectives</p> <p>General comment</p> <p>3.1. Last para of the Vision needs strengthening with increased examples to include Green Wedges, Local Green Space, Trees, Woodlands and Hedgerows. That is a logical reflection of the protections set out in the Chapter 10 policies.</p> <p><u>Objective 10</u>: Could be strengthened with reference to protecting, managing, and enhancing the green and blue assets that play an essential role in mitigating climate change.</p> <p><u>Objective 11</u>: The last sentence should incorporate the first sentence of Objective 12, without brackets, to read: <i>“All development will be required to respect local history, character, the natural environment and landscape including Local Green Spaces, ancient woodland, and veteran trees as well as conserving and enhancing the Borough’s biodiversity.”</i></p> <p><u>Objective 12</u>. The first sentence about development really needs to be taken out of Objective 12 completely. It fits much better incorporated into Objective 11, as suggested above. If it’s left in Objective 12, it completely de-values the rest of the otherwise really good commitment to protection, management, and enhancement. It’s noticeable that the objectives 13 for heritage, and 14 for Green wedges and Countryside don’t make any reference to development, so why should this one? If ‘green and blue infrastructure’ is going to stand any</p>	Having considered the suggestion, the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government’s aim to keep Plans to an appropriately shorter length than previous Plans.

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>chance of surviving presumed development the objective needs to be as strong as possible.</p> <p><u>Objectives 13 + 14:</u> These don't mention development, and hence give a sense of stronger commitment to protecting heritage, Green Wedges, and the Countryside. So why not be equally strong in Objective 12 re GBI policies, as suggested above?</p>	

Chapter 4 – Spatial Strategy (Policies 1, 2 and 3)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Local Resident, 14 th May 2024	Policy 1	<p>Policy 1</p> <p>Support</p> <p>Included in Policy 1 is the broad indication of the overall scale of development needed within the Borough. Based on the Leicester and Leicestershire Authorities – Statement of Common Ground relating to Housing and Employment Land Needs, there is need for 5,040 new homes to be built in the Borough over the 21 year Plan period. This includes a figure of 52 homes per year attributable to Leicester City’s unmet housing needs. I would want to support these figures.</p> <p>The need for new homes in the City is currently very high. Just one indicator of this is that in April, there were 400 families and 100 single people living in temporary accommodation in the City because there was insufficient permanent accommodation available. Leicester is a very built-up City and the evidence provided by the City Council shows that it would not be possible to identify all the land needed to meet the current housing needs. There have been social media comments that the City should make greater use of brownfield sites. Many brownfield sites have been brought back into use but these can be very costly schemes often requiring public subsidy which is seldom available. Many are commercially unviable to the private housebuilder.</p> <p>The relationship between the City and a Borough like Oadby and Wigston is also important. The Borough relies on the City for many jobs, shops, hospitals, universities,</p>	Support welcomed.

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>other educational establishments, cultural and recreational facilities, sports clubs etc. All of these uses take up huge amounts of land meaning that there are fewer sites for housing than would otherwise be the case. If the residents of the Borough make use of all these facilities then it seems only reasonable that the Borough makes some provision for helping to provide housing sites for some City residents.</p>	
<p>Local Resident, 12th May 2024</p>	<p>Spatial Strategy</p>	<p>Spatial Strategy</p> <p>General comment</p> <p>Page 23: says that there is capacity for 5600 homes. However these have not yet been assessed for their appropriateness. The Council has not yet developed evidence in relation to transport assessments. Only when the suite of evidence has been assessed will the Council know the infrastructure needed and the new annual home provision target. Yet an annual housing target is now being set.</p> <p>It is stated that there is a requirement of 188 homes per year, subject to evidence, plus the unmet needs of the City of 52 homes per year. This leads the Council to an (estimated) figure of 5040 over the plan period. I suggest we need more solid evidence about the housing demand before allocating sites in the local plan. We are already 4.5 years into the plan period. How many homes have been provided to date and does this affect the provision requirements up to 2041?</p>	<p>Under the Government's objective to significantly boost the supply of homes, the Council is required by Government to provide new homes that meet local needs.</p> <p>Paragraph 61 of the National Planning Policy Framework (NPPF 2023), states that '<i>To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area</i>'.</p> <p>The Leicester & Leicestershire Housing & Economic Needs Assessment (HENA 2022) was commissioned by all of the local authorities in Leicestershire to inform preparation of local plans across the region. This document is the evidence base outlining Oadby and Wigston Borough Council's housing need, economic growth and employment land needs for the new Local Plan period.</p> <p>Information on yearly completions is available in the Residential Land Availability Assessment (RLA) which</p>

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			is published on the Council's website. An updated assessment of provision will be provided at the Regulation 19 stage.
Local Resident, 13 th May 2024	Policy 1	<p>Policy 1</p> <p>General comment</p> <p>New homes</p> <p>The provision of 5040 new homes in the Borough represents a 20% increase in the number of houses. Meeting the City's unmet need (quantity not stated) is 20% of the total. What is the justification for this?</p> <p>"The new Local Plan will take account of Leicester City Council's declared unmet needs, unless evidence suggests that these levels of growth cannot be accommodated within the Borough area." Are the same criteria used (a) to determine the City's unmet needs and (b) to determine whether the Borough can accommodate them? If not, why not?</p> <p>What advantages to the Borough accrue from acceding to the City's request, or disadvantages of refusing them?</p> <p>New Jobs</p> <p>Employment Land</p> <p>Council is "seeking to provide" twice as much employment land as it needs, inter alia "to provide choice within the market". Does this mean that developers can have only half of the available and can choose which half, or could they take all of it?</p>	<p>The Council is committed to ensuring that residents of the Borough have access to appropriate local services and facilities. The New Local Plan will be a key factor in ensuring that such facilities and services are realised in the longer term. The Council is also required by Government, to provide new homes that meet local needs. Unmet housing needs from neighbouring local authorities can form part of local housing needs.</p> <p>Paragraph 24 of the National Planning Policy Framework (NPPF) states that '<i>Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries</i>'. Housing need is a cross boundary matter for all local authority areas within the Leicester and Leicestershire Housing Market Area, therefore cannot be ignored.</p> <p>The NPPF further states at paragraph 26 states that '<i>effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere</i>'.</p>

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			<p>NPPF paragraph 67 goes onto state that <i>‘strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment...’</i>.</p> <p>In 2022, Local Authorities within the Leicester and Leicestershire Housing Market Area agreed a Statement of Common Ground (SoCG) in relation to Leicester City’s declared unmet housing and employment needs. As part of this SoCG, the Council agreed the principle of accommodating a portion of Leicester City’s unmet housing need. Unless evidence suggests otherwise, the Council will be required through the SoCG to accommodate a portion of Leicester City’s unmet housing need within the New Local Plan.</p> <p>It is clear from the above, that the Council has a duty to take account of the unmet housing needs of other local authority areas. The ability for the Council to accommodate additional unmet housing needs of neighbouring local authorities will be evidence led. The Council has prepared the necessary evidence, which has informed the Regulation 19 Pre-Submission Draft Plan.</p>

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			Employment wording is to offer a range of sites for different types of employment.
Local Resident, 13 th May 2024	Policy 1	<p>Policy 1</p> <p>Objecting</p> <p>I live on the Morwoods and my house backs onto the Washbrook.</p> <p>I have observed over the last few years that the Washbrook is running higher and higher during periods of heavy rainfall which we are getting more frequently due to climate change.</p> <p>There have been two flooding events in the last two years including the heaviest on June 22, 2023 when four houses were flooded along The Morwoods and several back gardens including mine were fully submerged and covered in waste and sewage overflows.</p> <p>My neighbours and I have looked into this problem and believe that one of the key causes is significant new housebuilding in an already high density area leading to the Washbrook (and other local watercourses) having to handle significant extra drainage needs.</p> <p>As such I object to any new housebuilding in the areas proposed in the plan that would lead to any further load on the Washbrook.</p> <p>New houses should be built in areas that have a lower density of housing and therefore less demand on natural drainage infrastructure.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

Chapter 5 – Combating Climate Change (Policies 4, 5, 6, 7, and 8)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Local Resident, 14 th May 2024	Chapter 5	<p>Chapter 5, Combating Climate Change</p> <p>General comment</p> <ul style="list-style-type: none"> • Highly significant that Chapter 5, Combating Climate Change, now takes precedence after the Spatial Strategy, above all other policies – (14 pages and 5 policies, in comparison to 1 policy and 4 pages in the 2011-31 Plan). • There needs to be an explicit Policy referencing the enormous importance of trees, soils, and natural green space, in mitigating climate change. They are the Borough’s most valuable assets in achieving any climate change objective. Deeply worrying that there isn’t such a policy – there needs to be, to show clear commitment to protection of the Borough’s natural assets as set out in Chapter 10 Policies 30 – 36. Combating climate change cannot be achieved by new development and technical fixes – as in the currently listed policies. 	Having considered the suggestion, the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government’s aim to keep Plans to an appropriately shorter length than previous Plans.
Local Resident, 14 th May 2024	Policy 5	<p>Policy 5</p> <p>General comment</p> <ul style="list-style-type: none"> • At top, in Relevant Spatial Objectives, need to add Spatial Objective 14 Green Wedges and Countryside. Amazed it was left out. • In the Supporting Text, it’s good that there are references to the importance of natural assets in mitigating and adapting to climate change (e.g. 5.4.6, 5.4.9, 5.4.12.). But those references aren’t carried 	Having considered the suggestion, the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government’s aim to keep Plans to an appropriately shorter length than previous Plans.

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		<p>through anywhere in the actual policy wording - so their importance is rendered null and void.</p> <ul style="list-style-type: none"> • Every single policy statement starts with the word 'development' and refers exclusively to development. Development can only destroy the majority of the green space, trees and soils that are actually mitigating climate change before they get built on. The plan is supposed to be about controlling development. The way this Policy is worded should be looked at again. Current wording makes it even more vital that it is balanced by a specific Policy in Chapter 5 re commitment to protection of natural assets for the vital role they play in combatting climate change. 	
Local Resident, 14 th May 2024	Policy 6	<p>Policy 6</p> <p>General comment</p> <ul style="list-style-type: none"> • At top, in Relevant Spatial Objectives, need to add Spatial Objective 14 Green Wedges and Countryside. 	Having considered the suggestion, the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.
Local Resident, 14 th May 2024	Policy 6	<p>Policy 6</p> <p>General comment / Objecting</p> <p>I am a resident of Oadby and have lived in the Borough for much of my life. For the last 44 years I have lived in The Morwoods.</p> <p>The main concerns I have relate to the impact of the proposed developments on the flood risk this poses to the houses, including my home, which borders the Washbrook.</p>	<p>The Council has worked with statutory bodies and stakeholders to collect the evidence its needs for site selection. One of these is a strategic flood risk assessment that has helped inform site selection.</p> <p>Additionally, policy 3 Infrastructure and Developer Contributions seeks to require new development to include water and drainage facilities.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>Recent developments (many large scale) in Oadby have already had a detrimental impact on houses built on the lower areas of Oadby. We are declared high risk. Although it seems that any large-scale regeneration requires flood protection schemes there is no such protection for existing houses. Whilst developments are encouraged away from high-risk flood areas this will not make any difference to the already vulnerable houses along the Washbrook.</p> <p>Developments of any kind will have an impact on waste water. All surface water runs into the Washbrook. Whilst some green space will be preserved and houses will have small gardens when initially built it is inevitable that gardens will be concreted over for car parking. Whilst individually this will not seem to matter when all front gardens are concreted over the water has nowhere to go other than into the Washbrook. There needs to be a much more robust policy around changes such as this.</p> <p>Flood risks, and the history of floods in our Borough, are well documented and all the information and history is recorded by the Leicestershire County Council as the Lead Flood Authority (LLFA)</p> <p>My understanding is that the LLFA's formal flood investigation is ongoing, and the LLFA are continuing to prepare a bid for a Wash Brook catchment study. I also understand that the LLFA have also recently commented on Oadby & Wigston's draft Strategic Flood Risk Assessment, which will inform the updated Local Plan. It would be prudent to wait for the Washbrook Catchment study to be undertaken and take into account the findings for all proposed developments.</p>	

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		<p>Other related issues to flooding (infrastructure) – LCC Highways are still waiting for Severn Trent Water (STW) to confirm they had finished sewer investigations, prior to starting the review of highway gullies on the Morwoods.</p> <p>On June 22nd 2023 a sewer was overwhelmed and caused flooding down The Morwoods and sewage spilled into The Washbrook. Four houses along The Morwoods were flooded, as were a number of gardens, and, despite this being many months ago, not all houses are yet habitable. This causes much stress and anxiety and needs to be avoided again at all costs.</p> <p>For all these reasons the Application stage 3 detailed flood risk impact statement must include mitigation of flood risk and infrastructure planning for houses built in high flood risk areas. Oadby & Wigston Borough Council, in my view, have a duty to do so and prevent developments where this risk cannot be mitigated.</p>	
Local Resident 13 th May 2024	Policy 6	<p>Policy 6</p> <p>General comment</p> <p>I live on the Morwoods and my house backs onto the Washbrook.</p> <p>I have observed over the last few years that the Washbrook is running higher and higher during periods of heavy rainfall which we are getting more frequently due to climate change.</p> <p>There have been two flooding events in the last two years including the heaviest on June 22, 2023 when four houses</p>	<p>The Council has worked with statutory bodies and stakeholders to collect the evidence its needs for site selection. One of these is a strategic flood risk assessment that has helped inform site selection.</p> <p>Additionally, policy 3 Infrastructure and Developer Contributions seeks to require new development to include water and drainage facilities.</p>

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		<p>were flooded along The Morwoods and several back gardens including mine were fully submerged and covered in waste and sewage overflows.</p> <p>My neighbours and I looked into the causes of this and we have come to the conclusion that this is due to 4 main factors.</p> <p>1) Significant housebuilding in the area without sufficient new drainage infrastructure has resulted in more water draining into the Washbrook and other local water courses.</p> <p>2) Poor maintenance of the existing (very old) drainage infrastructure by organisations such as Severn Trent Water.</p> <p>3) Increased building of driveways over lawns and concreting of back gardens across much of Oadby.</p> <p>4) The Riparian Rights approach leaves the responsibility of clearing the Washbrook to individual residents although this watercourse serves as drainage for a very large area across Oadby. This results in significant waste debris building up within the Washbrook and similar water courses creating further flooding risk issues.</p> <p>Given all these factors, we believe that it is critically important that the local plan pays significant attention to ensuring the following.</p> <p>1) Any new housebuilding must be contingent on a significant improvement of the existing drainage infrastructure, and planning permission only granted if</p>	

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		<p>developers commit to putting adequate new infrastructure in place.</p> <p>2) The Riparian Rights approach needs to be reconsidered and replaced with something that makes the maintenance of water courses the responsibility of the council or similar authorities.</p> <p>3) Most urgently, the existing drainage infrastructure must be reviewed and upgraded to take into account not only current needs (wastewater, rainfall, etc) but also potential increases to drainage need due to climate change in the future.</p>	
<p>Local Residents, 14th May 2024</p> <p>(group of 3 people submitted this same comment on individual forms but sent through all three on same email)</p>	<p>Policy 6</p>	<p>Policy 6</p> <p>General comment</p> <p>Copied below from the local plan document coloured blue</p> <p>Policy 6: Flood Risk and Sustainable Water</p> <p>5.5.1 Development should be directed towards the areas of lowest flood risk first. Where this is not possible, within the site the most vulnerable development should be located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location. All sources of flood risk should be considered. You talk about the areas for development being at the lowest area of flood risk but what about the existing areas of housing whose risk of flooding will significantly increase, particularly those on the Washbrook flood plain.</p> <p>5.6.1 Flooding occurs from a range of sources and as a result of climate change flood events</p>	<p>The Council has worked with statutory bodies and stakeholders to collect the evidence its needs for site selection. One of these is a strategic flood risk assessment that has helped inform site selection.</p> <p>Additionally, policy 3 Infrastructure and Developer Contributions seeks to require new development to include water and drainage facilities.</p> <p>Any applications will have to be in line with the sequential approach as currently set out in the NPPF.</p>

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		<p>are likely to become more frequent and more severe impacting local communities and the environment. It is therefore important that development is safe and resilient and does not increase flooding elsewhere. Development can present opportunities to reduce flood risk through natural flood management techniques and the use of Sustainable Drainage Systems (SuDS) which also have the potential to provide a range of multifunctional benefits.</p> <p>You talk about reducing risk through flood management and the introduction of SUDS for new developments, but what about SUDS for the existing houses on the Washbrook floodplain who have not benefited from any SUDS whist Oadby is being covered in concrete?</p> <p>What measures are being taken in this regard. The silence on this matter in your consultation document is shocking.</p> <p>5.6.2 In line with national planning policy, development should be directed towards the areas of lowest flood risk first. Where this is not possible, within the site the most vulnerable development should be located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location. What are these over riding reaons? All sources of flood risk should be considered.</p> <p>5.6.3 The exception test may have to be applied in relation to development proposals. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set</p>	

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		<p>out in national planning guidance.</p> <p>5.6.4 The proactive management of flood risk is one of the most important ways of managing the potential impacts of climate change that would have an effect of the Borough's water environment. Examples of these likely recurring events may include:</p> <ul style="list-style-type: none"> • Increased flood risk due to wetter winters and more frequent destructive storms; • Strain on water availability due to drier, longer summers; and • Expectation that rain storms will be heavier and more prolonged. Where heavy rain cannot be absorbed fast enough by land this leads to localised flooding and potential flash floods. This is not potential, there is proof and evidence that flash floods occur in Oadby on the Washbrook flood plain. I have been reporting this for 8 years to the LLFA. Further building in Oadby will worsen the impact of flash flooding. <p>Are you aware that last June 2023 the flash flooding overwhelmed 5 residences on the Morwoods with devastating consequences.</p> <p>How can these proposals continue without taking this into consideration.</p> <p>A local study of the Washbrook and the consequences of continued development on areas that will impact the flood plain MUST be understood before more building takes place.</p> <p>I know that surface water run off from all over Oadby runs into the Washbrook and overwhelms it. Where are the surface water run off proposals in your local plan proposals? Where are the impacts upon the existing Victorian sewage system in these proposals? The old</p>	

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		<p>Oadby sewage system we know is NOT FOT FOR PURPOSE and which took over 1 year to replace simply the main pipe running from The Parade to the A6 junction. The rest of it cannot cope either!</p> <p>This plan needs an extensive analysis of this, without this, going ahead with the building is criminal and irresponsible. I challenge you to show me evidence to the contrary.</p> <p>5.6.5 The Council has commissioned consultants to prepare its Level 1 and 2 Strategic Flood Risk Assessment (expected 2024) and this is being prepared in liaison with Oadby & Wigston Borough Council Regulation 18B Preferred Options New Local Plan – Consultation Draft statutory consultees including the Environment Agency and Lead Local Flood Authority, as well as in accordance with the requirements of the National Policy.</p> <p>5.6.6 The aim of the emerging Strategic Flood Risk Assessment is to provide sufficient information for the application of the Sequential Test and to identify whether application of the Exception Test is likely to be necessary. The Strategic Flood Risk Assessment involves a broad scale assessment of areas at risk of flooding within the Borough, be it fluvial or other forms of flooding and includes advice on sustainable drainage techniques and other flood risk solutions. The Study also predicts likely increased flooding risk in the Borough due to relevant factors, including climate change.</p> <p>Please can you include this risk assessment in the consultation process. I wish to see the professional</p>	

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		<p>assessment of flood risk on those properties that border the Washbrook and that sit on the flood plain.</p> <p>5.6.7 Within the Borough there are two main occurrences of Flood Zone 2 and 3; one along the River Sence corridor (which is a tributary of the River Soar), adjacent to the Grand Union Canal to the south of the Borough; and, one along the Wash Brook corridor which flows west to east between north Wigston and Oadby.</p> <p>5.6.8 Blue and Green Infrastructure (BGI) and Natural Flood Management (NFM) can capture flood flows and provide additional flood storage, which is a form of climate change adaptation. New wetland habitat also provides additional biodiversity benefits. These measures would be especially valuable upstream of communities at flood risk such as the community along the Wash Brook and the community at Wigston Harcourt. These comments are very generalised and do not specify in any way what flood flow protection and flood storage will be provided for properties downstream where there is a considerable risk of increased flooding. SUDS for existing housing MUST be part of this local plan if it is to go ahead in any meaningful manner.</p> <p>5.6.9 The only main river in the Borough recognised by the Environment Agency is the River Sence in the south of the Borough. However, there is also recognised flood risk from the Wash Brook ordinary watercourse and the Evington Brook main river to the North (outside of the Borough's boundary). There is a 'Community at Risk of flooding' on the</p>	

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		<p>Wash Brook What is this? You do not explain? This need to be provided. and also a 'Community at Risk of flooding' at Wigston Harcourt, from an ordinary watercourse and which is a tributary of the River Sence.</p> <p>5.6.10 The Strategic Flood Risk Assessment will help to inform the spatial development strategy for the Borough and is the basis upon which the Sequential and Exception Tests will be applied. This is very vague. When will this take place?</p> <p>There is significant flood risk for housing on the flood plain of the Washbrook coupled with the related Victorian infrastructure. All the surface water in the Washbrook catchment will head to the Brook either via the Brook, the road surfaces, or the sewer pipes.</p> <p>Sewage pipes cannot cope and burst, sending effluent into the Brook as well as other pollutants.</p> <p>The LLFA will be undertaking a study of The Washbrook as it runs through Oaddy and there should be no development in the catchment area until that is completed.</p> <p>New housing residents will quickly increase hard surface water run off, by extending property and introducing hard standing in gardens - none of which will be included in developers flood risk calculation / mitigation data. Nor will this be challenged because of the rules on permitted development.</p> <p>In addition – certain addition to vehicle traffic (likely 2/3/4 cars per house, given the socio-economic profile of Oadby residents) - and on the lack of employment opportunity and public transportation within the borough, necessitating car travel to work / schools.</p>	

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		<p>Roads in Oadby are inadequate for the volume of traffic, particularly on the Wigston Road and no doubt all the new families will be driving their children to school at Gartree, Manor and Beauchamp. How can this be countenanced??</p> <p>If Oadby expands to its boundary then Harborough will be likely to develop the other side of the boundary, but the increased traffic and service demands etc would be detrimental to Oadby residents.</p> <p>The removal of green space - wellbeing of Oadby residents etc., and the resulting change to the character and profile of the previously green and leafy borough.</p> <p>The loss of trees and natural habitat for wildlife. Do planners fail to understand the consequences of cutting down old trees? Where do the birds go? The pollinators?</p> <p>Please could you explain to me how this development of Oadby into a concrete car park will help out natural environment? Our wellbeing? Our mental health?</p> <p>In fifty years time when our children are exposed to extremely high temperatures, flash flooding and worse, where are the trees that given them shelter and drink the water from the earth?</p> <p>This local plan is short sighted and unsustainable. OWBC needs to stand up and fight for our green spaces, it needs to show central government why this plan is unrealistic and unworkable based on proper evidence and careful argument.</p>	
Local Resident, 14 th May 2024	Policy 7	<p>Policy 7</p> <p>General comment</p> <ul style="list-style-type: none"> • This has to be a strategic target. • At top, in Relevant Spatial Objectives, need to add Spatial Objective 12 Conserving and enhancing green 	<p>Having considered the suggestion, the Council has made some, but not all, changes. Where it has not taken on the suggestion, this is because the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.</p>

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		<p>and blue infrastructure, and Objective 14 Green Wedges and Countryside. Both are essential objectives to help mitigate air pollution.</p> <ul style="list-style-type: none"> • In the supporting text Para 5.8.1 correctly includes reference to air pollution. Para 5.8.2. could strengthen that by S • In Policy text especially important to put in stronger Policy reference to trees and natural green space given that para 2.4.1. correctly refers to the Borough's roads suffering, "<i>..from significant congestion, particularly at peak times.</i>" The Borough's annual ASR reports also show pollution levels of the Borough's roads and should be referenced as evidence for protection of existing trees and green space as natural mitigation measures in this Policy 7. • The Policy text could be strengthened in a similar way to refer to new trees and landscaping in new development. • The penultimate paragraph in the policy text needs air pollution added in. 	

Chapter 6 – Housing (Policies 9, 10, 11, 12, and 13)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Local Resident, 15 th May 2024	Policy 12	<p>Policy 12</p> <p>General Comment</p> <p>Need to mention the protection of the Green Wedges provided by Policy 33.</p>	<p>Having considered the suggestion, the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.</p>
Local Resident, 12 th May 2024	Policy 12	<p>Policy 12</p> <p>General comment</p> <p>Page 54 Policy 12: Need to mention the protection of the Green Wedges afforded by Policy 33.</p>	<p>Having considered the suggestion, the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.</p>
Local Resident, 14 th May 2024	Policy 13	<p>Policy 13</p> <p>General Comment</p> <p>Add Objective 14 Green Wedge and countryside for Policy 13</p>	<p>Having considered the suggestion, the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.</p>

Chapter 7 – Commercial Development (Policies 14, 15 and 16)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Local Resident, 14 th May 2024	Policy 15	<p>Policy 15</p> <p>General Comment</p> <p>Add Objective 14 Green Wedge and countryside for Policy 15</p>	<p>Having considered the suggestion, the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.</p>
Local Resident, 14 th May 2024	Policy 15	<p>Policy 15</p> <p>Objecting</p> <p>The principle of ensuring that retail and other associated uses are located in existing town and district centres makes sense. Reference is made on page 67 to retail development being supported in “defined policy areas” but it is not clear if these refer to the District Centre boundaries or the Primary Shopping Areas as shown on the adopted Policies Map. Bearing in mind that the need for new retail floorspace is substantially less than it was a few years ago (as referenced in paragraph 4.7.4. because of the growth of online shopping and the effects of the pandemic), I would maintain that any new retail development should be focused in Primary Shopping Areas. There are already a large number of vacant retail units in these areas so there is no logic in adding to this number.</p>	<p>Having considered the suggestion, the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.</p>
Local Resident, 12 th May 2024	Policy 16	<p>Policy 16</p> <p>General comment</p> <p>Page 63 Policy 16: It appears only a limited provision will</p>	<p>Noted.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>be made for new employment sites within the Borough. This means that most of those occupying any new housing allocations are likely to have to commute outside the Borough.</p>	

Chapter 8 – Transport and Community Infrastructure (Policies 17, 18, 19, 20, 21 and 22)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Local Resident, 12 th May 2024	Policy 17	<p>Policy 17</p> <p>General comment</p> <p>Page 74 Policy 17: It would have been useful to have had a plan of the existing transport network as new development should preferably be sited close to principal transport corridors. Although it is stated that there will be consultation with National Highways, as there are no trunk roads or motorways within the Borough it seems unlikely that they will have an interest. The main impact will be on City and County roads.</p> <p>Reference is made to a Potential Transport Route. What is this and what is its status?</p>	The Potential Transport Route is the route of the former East Leicestershire bypass. This scheme does not have funding but the idea of a transport route is still supported and so the Council remains supportive of this in the Plan.
Local Resident, 14 th May 2024	Policy 18	<p>Policy 18</p> <p>General comment</p> <p>Add Objective 14 Green Wedge and countryside for Policy 18</p>	The Council has made the suggested change.
Local Resident, 14 th May 2024	Policy 19	<p>Policy 19</p> <p>General comment</p> <p>Add Objectives 10 Climate Change, and 12 Conserving and enhancing green and blue infrastructure for Policy 19</p>	Having considered the suggestion, the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.
Local Resident, 14 th May 2024	Policy 19	<p>Policy 19</p> <p>General comment</p>	Having considered the suggestion, the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to

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		<p>Para 8.5.1 only refers to what new development has to do. That doesn't reflect the Supporting Text which sets out an overarching Policy for all aspects of Council decision making – not just for new development. That's covered well in seven paras 8.6.1 – 8.6.6 and para 8.6.10. There are then three paras, 8.6.7 – 8.6.9, on ensuring new development contributions. That's a good balance. Could it be better reflected in the opening para 8.5.1? E.g. change the last sentence to:</p> <p><i>The policy sets out a range of health-related issues that the Council and its partners will address. The Council will ensure that all new development contributes to providing opportunities for healthy lifestyles, or show why health related issues cannot be addressed in this particular case.</i></p> <p>Relevant Spatial Objectives: need to include Objective 10 Climate Change and Objective 12 Conserving and enhancing green and blue infrastructure, because of the importance of trees and green spaces in reducing local air temperature, and mitigating air pollution. Also important to include Objective 13 Enhancing local heritage. Those 3 Objectives cover essential elements that contribute to an area being an attractive place to live.</p> <p>Supporting Text: The NPPF quote used in Para 8.12.1 in Policy 22 is an excellent opener for supporting text and could very valuably be used here, too.</p> <p>Policy Text: Important to add requirement for any HIA to include impact of loss of any existing open space and trees, and any loss of designated Green Wedge, Countryside, or Local Green Space.</p>	<p>keep Plans to an appropriately shorter length than previous Plans.</p>
<p>Local Resident, 12th May 2024</p>	<p>Policy 20</p>	<p>Policy 20</p> <p>General comment</p>	<p>The Policy makes reference to electric vehicle charging facilities, e-bikes are electric vehicles. The Council therefore believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		Page 80 Policy 20: Should mention secure cycle parking, charging of electric cycles.	government's aim to keep Plans to an appropriately shorter length than previous Plans.
Local Resident, 14 th May 2024	Policy 22	<p>Policy 22</p> <p>General Comment</p> <p>Para 8.11.1 and Relevant Objectives very good. The 8.12.1 quote is also an excellent opener to the Supporting text and applies equally in Policy 19.</p> <p>Re Policy Text</p> <ul style="list-style-type: none"> * Add 4th criterion to first bullet list: “..where they are protected by Policies 32, 33 and 34.” * The policy wording currently focuses almost exclusively on outdoor sports or recreational facilities. Yet the Borough’s own past evidence base included reference to residents using informal open space more than formal facilities. There should be more reference to informal green space, including mention of Green Wedge, Countryside and Local Green Space. 	Having considered the suggestion, the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.

Chapter 9 – Design and The Built Environment (Policies 23, 24, 25, 26, 27, 28 and 29)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Local Resident, 14 th May 2024	Policy 24	<p>Policy 24</p> <p>General comment</p> <p>Add Objective 14 Green Wedge and countryside for Policy 24</p>	<p>Having considered the suggestion, the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.</p>
Local Resident, 14 th May 2024	Policy 25	<p>Policy 25</p> <p>General comment</p> <p>Good inclusion of Spatial Objectives. Re Policy Text Suggest strengthening last sentence with addition as follows (indicated in bold only for clarity): <i>Development proposals that have an adverse impact on local character, nationally or locally designated areas or features of landscape and cultural significance will not be permitted.</i> If it only covers nationally designated all the locally designated sites are at maximum risk of being lost or spoilt by being encroached.</p>	<p>Having considered the suggestion, the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.</p>
Local Resident, 14 th May 2024	Policy 26	<p>Policy 26</p> <p>General comment</p> <p>Relevant Spatial Objectives need to include Objective 12 Conserving and enhancing green and blue infrastructure, and Objective 14 Green Wedges and Countryside. That is consistent with the good Policy Text list of heritage assets which quite rightly specifies inclusion of significant natural environmental features of historic importance locally</p>	<p>Having considered the suggestion, the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Local Resident, 14 th May 2024	Policy 27	<p>Policy 27</p> <p>General comment</p> <p>Add Objective 9 Healthy lifestyles in Policy 27</p>	<p>Having considered the suggestion, the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.</p>

Chapter 10 – Natural Environment (Policies 30, 31, 32, 33, 34, 35 and 36)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Local Resident, 14 th May 2024	Chapter 10	<p>Chapter 10, Natural Environments</p> <p>General comment</p> <ol style="list-style-type: none"> 1. Loss of the current 2011-2031 Chapter heading “Protected Places” is a retrograde step. <ol style="list-style-type: none"> 1. It’s been a brilliant solution in the current 2011-31 Plan, bringing all the Borough’s at risk assets together under one cohesive heading. 2. “Protected Places” states an essential commitment for the Chapter 10 natural assets, especially given the dramatically increased importance of mitigating climate change. 3. We understand from Ed that Government reforms to the Local Plan system (18B para 1.8.3.- 1.8.6.) will use three, simpler, designations of: growth; redevelopment or renewal; protection. The title “Protected Places” therefore provides a good fit to, “..ensure that any new national requirements are incorporated into the plan making process as appropriate.” (18B para 1.8.6.) 4. “Protected Places” gives clarity and strength to the Council’s aims, and was endorsed by the Inspectorate in 2018. Put it back – it’s too good to lose! 2. Green assets now all grouped together is way better than at the 2021 Issues and Options stage. 3. We strongly disagree with any of the Chapter 10 policies being defined as non-strategic. It’s a strategic challenge to protect them because they’re under threat from presumed development. A Google search brings these definitions: “Strategic”: <i>“relating to the identification of</i> 	<p>Having considered the suggestion, the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.</p>

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		<p><i>long-term or overall aims and interests and the means of achieving them</i> “Non-Strategic”: “<i>not helping to achieve a plan</i>”. The NPPF makes clear that strategic policies should make sufficient provision for: “<i>conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.</i>” (Part 02 para 4.9.d) in Borough’s 2021 Issues and Options papers). So there’s nothing to stop all the Chapter 10 policies being strategic. They should be. Ed has reasoned that it’s about whether a Policy is overarching and applies to the whole Borough, as opposed to referring to just parts of the Borough. We disagree strongly: if a Policy isn’t Strategic, it can be argued that it isn’t about the overall aims of the Plan. Otherwise, how withstand a challenge from any developer? Developers could argue that if a policy isn’t <i>strategic</i>, a proposed site is “<i>not helping to achieve the plan</i>”, so can’t be important enough to protect in achieving the Borough’s “<i>overall aims and interests</i>”. We could lay bets that’s exactly the arguments any lawyer would use to challenge refusal of development site proposals – thereby overturning the protections set out in Policies 32 - 36.</p> <p>4. In addition, all the Policies 30-36 need to be designated as Strategic because of the enormous importance of all those environmental assets in mitigating climate change. This 18B draft has, quite rightly, a vastly increased focus on Combating Climate Change. Policy 5 Climate Change is strategic. It can’t be achieved without designating all the Chapter 10 policies as strategic.</p>	
Local Resident, 14 th	Chapter 10	Chapter 10	

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
May 2024		<p>General comment / Objection</p> <p>I am a resident of Oadby and have lived in the Borough for much of my life. For the last 44 years I have lived in The Morwoods.</p> <p>The main concerns I have relate to the impact of the proposed developments on the environment including biodiversity, green and blue infrastructure (GBI), green spaces, green wedges (potentially) and the countryside. Also, the impact on health and wellbeing of the residents of Oadby and Wigston.</p> <p>Proposals that cause loss of or harm to any part of the green and blue infrastructure network will not be supported unless the need for and benefits of the development demonstrably outweigh any adverse impacts. It seems to me that all proposals will be supported if we are to meet the need of 240 houses per year until 2041 and so the developments will take priority regardless of their impact. Is this correct?</p> <p>Where adverse impacts on green and blue infrastructure are unavoidable, development will only be supported if suitable mitigation measures for the network are provided. Nearly all of the proposed developments will impact green spaces and will cause harm. In almost all cases the adverse impact will be felt. How will this be addressed? How will harm to biodiversity be compensated for? If it cannot then the development must be rejected.</p> <p>It is important that the following is addressed and included.</p> <p><i>“GBI has a vital role in promoting healthy and safe communities that can improve the wellbeing of a</i></p>	<p>As discussed in the introduction, taking account of the Regulation 18B Site Options available to the Council, there is capacity for up to 6,000 new homes in the Borough. This is more than the required number of homes left to build, taking account of the housing need between 2020-2041 and the homes already built and those committed as of Spring 2024. The Council will not permit any development that will cause loss or harm to green and blue infrastructure, unless the need for and benefits of the development demonstrably outweigh any adverse impacts.</p> <p>The Government introduced a Biodiversity Net Gain requirement that seeks that all new major development improves existing biodiversity on a site by 10%. Developers will be held accountable to this and any associated monitoring fees.</p> <p>Brocks Hill CP is too large to meet Govt criteria for a local green space.</p> <p>Policy 35 included in plan to boost tree coverage.</p> <p>Part of Council’s evidence base is a strategic flood risk assessment which has helped inform the site selection process.</p>

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		<p><i>neighbourhood with opportunities for recreation, exercise, social interaction, experiencing and caring for nature, community food-growing and gardening, all of which can bring mental and physical health benefits. GBI can help to reduce health inequalities in areas of socio-economic deprivation and meet the needs of families and an ageing population.”</i></p> <p>Local Green Space</p> <p><i>The NPPF suggests that local communities should be given the opportunity to identify green areas of particular importance to them through local and neighbourhood plans. It also suggests that the designation would have a high degree of protection from new development due to its local importance. Importantly, national planning policy makes it clear that this designation should be consistent with wider planning policy for the area and should complement investment in the provision of new homes, employment opportunities and other essential services.”</i></p> <p>Although not included currently do not under any circumstances include any part of Brocks Hill Nature Park as a potential site for development (of any kind). This meets the Local Green Space criteria and should be designated as such in the Local Plan</p> <p>Interestingly, and I quote, <i>“the Tree Equity Score, launched in Winter 2023, shows that the Borough of Oadby and Wigston has an average canopy coverage of 14.8%, ranging from 7% in parts of South Wigston to 33% in parts of Oadby. The Borough’s average canopy cover is therefore lower than The Environmental Targets (Woodland and Trees Outside</i></p>	

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		<p><i>Woodland) (England) Regulations 2023 target of reaching 16.5% canopy cover by 2050.”</i></p> <p>Oadby and Wigston Borough Council don't seem to have a very good record in preventing the loss of trees and hedgerows with the destruction of hedges and trees around Brocks hill / Parklands and the recent destruction of the area on Washbrook Lane. The figures above are revealing and it would be good if the residents of Oadby and Wigston could count on the council to be more active (not reactive – once a tree is gone it's gone) and place more importance on retaining what we have as well as making sure the planting of trees, to replace the trees lost but also to increase the number of trees, is a must, not an ask, in all developments being proposed.</p> <p>It's concerning to note that the Local Plan will mean that all the proposed developments in total will completely wipe out any green spaces of any significance. How is this equal for the residents of Oadby and Wigston? How is this good for health and wellbeing (although health and wellbeing features in the Local Plan it is difficult to see how, if any, importance is attached to it).</p> <p>Developments of any kind will have an impact on waste water. All surface water runs into the Washbrook. Whilst some very small green space will be preserved and houses will have small gardens when initially built it is inevitable that gardens will be concreted over for car parking. Whilst individually this will not seem to matter when all front gardens are concreted over the water has nowhere to go other than into the Washbrook. There needs to be a much more robust policy around changes such as this.</p>	

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		<p>Flood risks, and the history of floods in our Borough, are well documented and all the information and history is recorded by the Leicestershire County Council as the Lead Flood Authority (LLFA)</p> <p>Any development must reduce and manage flood risk and drought through managing water run-off and providing sustainable urban drainage solutions and also take into account the effects of the development downstream.</p> <p>My understanding is that the LLFA's formal flood investigation is ongoing, and the LLFA are continuing to prepare a bid for a Wash Brook catchment study. I also understand that the LLFA have also recently commented on Oadby & Wigston's draft Strategic Flood Risk Assessment, which will inform the updated Local Plan. It would be prudent to wait for the Washbrook Catchment study to be undertaken and take into account the findings for all proposed developments.</p> <p>For this reason alone, the Application stage 3 detailed flood risk impact statement must include mitigation of flood risk and infrastructure planning for houses built in high flood risk areas. Oadby & Wigston Borough Council, in my view, have a duty to do so and prevent developments where this risk cannot be mitigated.</p>	
Local Resident, 14 th May 2024	Policy 30	<p>Policy 30</p> <p>General comment</p> <p>Good inclusions <u>Supporting text</u> The term Green and Blue Infrastructure seems to have come from Natural England, so not the Council's responsibility, but</p>	Having considered the suggestion, the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.

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		<p>it's really dire. Since the Council seems to have to use the term, protection of these natural assets needs to be strengthened re the following points:</p> <ul style="list-style-type: none"> • The para 10.2.1 definition refers to a '<i>strategically planned and delivered network... of spaces, natural features, and the connections between them....etc</i>'. That seems worryingly loose and could be interpreted to argue against the protections in Policies 32-36. The whole point about natural assets is that they aren't planned – it's protecting them from development that requires the strategic planning. • Paras 10.2.5. to 10.2.7. make an apparent distinction between '<i>strategic GBI</i>' and '<i>more local GBI</i>'. Unfortunately those paragraphs yet again adopt a hierarchy between apparently 'important' GBI, and other GBI that really doesn't seem to matter so much because it's only local. But being 'local' makes it all the more important for the spatial objectives 9, 10, 12, and 14. Given that Policies 30 – 36 are there to protect each of the natural assets it's deeply unhelpful to then make some kind of hierarchy and thereby risk weakening those very same protections. • Para 10.2.6. also introduces additional confusion, as countryside, and green wedges are termed as strategic in 10.2.6. – but their Policies 33 and 34 are non-strategic. • In our view, all the natural assets in Chapter 10 Policies need to be designated as GBI – without any distinction between strategic and local. That can be easily done by 10.2.5. – 10.2.7 being simplified to one para citing all the natural assets protected by Policies 30 – 36, and cross referencing their vital contribution to Chapter 5 Climate Change policies. <p><u>Policy Text</u></p>	

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		<p>Good that arrangements for funding, management and maintenance are included. But there is a major question re who carries the costs. The Council will be well aware of the major problems in new build lease arrangements for communal land. No idea how, as a Council, that can be mitigated – but it ends up that the developers don't do the funding, but pass the costs on as a major problem for residents of such sites.</p>	
<p>Local Resident, 14th May 2024</p>	<p>Policy 30</p>	<p>Policy 30</p> <p>General comment</p> <p>The Local Plan suffers from several contradictions with respect to the strategic importance of green & blue infrastructure and residential development. Oadby and Wigston has precious little greenfield land, and even less established woodland. This was not the case a few decades ago, but it is a fact today. The United Kingdom is in a nature crisis, with woodland bird populations declining at record rates, in part caused by reduced food available. Insect populations are down, stressing birds and other wildlife. Our green and blue infrastructure set away from development offers wildlife the relative quiet, and darkness during the night. It is disappointing to see no mention of a Local Nature Recovery Strategy in this Local Plan – our borough's commanding document on how land use will change over coming decades. Surely, for the success of nature recovery ambitions these must be considered alongside options for residential development.</p> <p>There are locally important habitats that are under pressure from current residential development, poor farming practices and outdated land management on the south of the borough.</p>	<p>Policy 2 Regeneration and Large Scale Change states that development of large scale change must contribute towards objectives within Local Nature Recovery Strategies.</p>

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		<p>Coincident here are the land options Wigston Meadows Phase 3 and land west of Welford Road – Kilby Bridge. The Local Plan does not address the existing pressures to the green infrastructure, but instead presents a future of nature being elsewhere, and not in Oadby and Wigston borough. Development in this environ will lead to further fragmentation of green spaces, and conflicts with Policy 30’s statement on ecological connectivity. Poor decisions on land have been made for too long, and a new Local Plan is an opportunity for ambition and leadership on the natural environment within our boundary.</p> <p>The blue infrastructure in the south of the borough (River Sence and Grand Union Canal) is under pressure from agricultural runoff and bank erosion. The area is a well established flood plain, and several fields flood during winter months, resulting in transient ponds in field corners. This causes significant reduction in crop yields repeatedly, and pollutes waterways. The possibility of new development close to the Grand Union Canal will be detrimental to the broader challenges of flooding in this area, harming landscape character and not helping with temporary impasses to public rights of way downstream. Impacts to nature extend beyond the red line boundaries of these options, and this has not been addressed within the Local Plan.</p>	
Local Resident, 14 th May 2024	Policy 31	<p>Policy 31</p> <p>General comment</p> <p>This policy sums up the climate change denial that is shot through Government policy, the NPPF and the way Natural England and the Environment Agency have, in our view, caved in and just work to comply with the Government agenda of growth, growth, and more growth. We know the</p>	Having considered the suggestion, the Council has made some, but not all, changes. Where it has not taken on the suggestion, this is because the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.

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		<p>Council has to work in the same frameworks. You'll also know we've been calling out this Alice in Wonderland nonsense for ever. My heart sank when I read this policy, and we've said this before, but it STILL needs saying.</p> <ol style="list-style-type: none"> 1. Biodiversity and geodiversity cannot can be created. It grows, naturally, where it is, because of the right fine-tuned mix of circumstances and time. Lots of undisturbed time. 2. It's loss can't be mitigated or compensated – when it's gone, it's gone. 3. The idea that there's some hierarchy of what is important is nonsense. It gets defined as important because it's rare. It's rare because the rest of it, that once existed, doesn't any longer. It's been destroyed, or can't survive any longer because of destruction all round it. 4. If we don't recognise the stuff that isn't yet rare, AND PROTECT IT, it will, sure as heck, become rare. 5. Even the 'designated' stuff isn't being fully protected – open to depletion by a thousand cuts.... <p>14th May 2024: https://www.independent.co.uk/climate-change/news/wwf-nature-climate-change-committee-mps-yougov-b2512316.html WWF, RSPB, The Wildlife Trusts and Woodland Trust sound alarm. 19% of British species vanished since 1970's, 1 in 6 now on precipice. Britain now one of the most nature-depleted countries in the world. https://inews.co.uk/news/every-uk-political-party-failing-tackle-crisis-nature-3050643/</p> <p>Full credit – good – that in the Supporting text you've included the paragraphs on non-designated sites and habitats. If you can beef them up even more, do so. If you can carry that through to the Policy Text more, do so. Pull out every stop that, might, just might, protect the fragility of</p>	

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		<p>the ecosystems that don't have a designation. You have their future in your hands – so do all you can, and more.</p> <p><u>Relevant Spatial Objectives</u> Have to include Objective 10 Climate Change</p> <p><u>Policy Text</u> Good to see the following paras: <i>“Development that results in the loss or deterioration of an irreplaceable habitat (such as ancient woodland, ancient or veteran trees, and ancient hedgerows) will only be permitted for wholly exceptional reasons where:</i> <i>a) The need and benefits of the development in that location clearly outweigh the loss; and,</i> <i>b) It has been robustly demonstrated that the irreplaceable habitat cannot be retained within the proposed scheme; and</i> <i>c) Appropriate compensation measures are provided on site (off site where this is proven not feasible). The scale and quality of the compensation measures required will be commensurate to the loss or deterioration of the irreplaceable habitat, including long term management and maintenance.”</i> And <i>“Planning conditions or obligations</i> <i>“Where appropriate, the Council will use planning conditions or obligations to provide appropriate enhancement and site management measures, and where impacts are unavoidable, mitigation or compensatory measures. Proportionate monitoring fees will be required from the applicant to cover all costs incurred by the Council over the lifetime of all relevant obligations, for example, for the monitoring of schemes on-site or off-site over the 30- year lifetime of those obligations.”</i></p> <p>Need to challenge the SA site assessment criteria in SA Appendix C – see separate submission form.</p>	

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Local Resident, 15 th May 2024	Policy 31	<p>Policy 31</p> <p>Objection</p> <p>Chapter 10 Natural Environment Policy 31: The policies to protect and enhance biodiversity are welcome, but the Local Plan currently overlooks biodiversity which inhabits buildings, e.g. red-listed endangered bird species such as swifts, house sparrows, and house martins, which are also overlooked by the DEFRA biodiversity net gain metric calculation so do need their own clear policy. This is supported by national planning guidance NPPG Natural Environment 2019 paragraph 023, which in particular mentions the value of swift bricks.</p> <p>Policy 31 (or Policy 30 Green Infrastructure if deemed more appropriate there): Swift bricks are a universal nest brick for small bird species, and should be installed in all new-build developments including extensions, in accordance with best-practice guidance such as BS 42021:2022 or CIEEM. Swift bricks are a significantly better option than external boxes due to their long lifetime, no maintenance requirements, improved thermal regulation, and aesthetic integration. Artificial nest cups for house martins may be proposed instead of swift bricks where an ecologist specifically recommends it.</p> <p>Policy 31: Existing nest sites should also be protected and retained, as these are not given any value by the DEFRA biodiversity net gain metric calculation. Building-dependent species return to traditional nest sites year after year, and find it difficult to locate a new site if they lose it.</p> <p>The more detailed reasons for these additions are: National Design Code also recommends bird bricks, to</p>	<p>The Council notes that paragraph 023 of the NPPG (2019) was deleted along with paragraphs 022, 024, 025, 026, 027 and 028 due to separate guidance being provided on biodiversity net gain. Planning system enables protection of trees of value does not apply to nests. Wildlife-friendly development is likely to evolve as biodiversity net gain evolves.</p>

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		<p>ensure that swift bricks are included at an early design stage for effective integration into the building design and reliable installation on site.</p> <p>Swifts are an important species in Leicestershire with a substantial number of older buildings and suitable areas for foraging, and the RSPB Swift Mapper website (https://www.swiftmapper.org.uk/) demonstrates that they are recorded nesting throughout the county. Other birds which will inhabit swift bricks are also present, such as house sparrows which are also endangered.</p> <p>Leicestershire has positive planning guidance for Swift Alert Areas, but this will not help swifts move into new areas and also does not reflect swift bricks being universal nest bricks for a range of small bird species.</p> <p>Other local authorities are bringing through Local Plan policies which support swift bricks, such as Wiltshire Regulation 19 stage which requires two swift bricks per dwelling (policy 88 on page 246: https://www.wiltshire.gov.uk/article/8048/Current-consultation-Reg-19)</p>	
Local Resident, 14 th May 2024	Policy 31	<p>Policy 31</p> <p>General comment</p> <p>Add Objective 10 Climate change in Policy 31</p>	The Council has made the suggested change.
Local Resident, 4 th May 2025	Policy 31	<p>Policy 31</p> <p>General comment</p> <p>The following should be included in Policy 31.</p>	Having considered the suggestion, the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.

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		<p>Include protection of footpaths, bridleways and greenways to policy to enable protection of biodiversity and free movement of wildlife between areas of habitat.</p> <p>Ensure that areas surrounding public rights of way are not developed or altered to the detriment of free and unhindered movement of wildlife and that free movement of fauna and flora is encouraged and protected.</p> <p>Reason:</p> <p>Proposed area OAD/006 includes the Bridleway section of Gorse Lane and footpaths leading to Fludes Lane and to Stretton Church. It also bounds natural woodland and open countryside with a diverse population of mammals, birds and insects that use these historic pathways to navigate between the areas. Preservation of these pathways is integral to the preservation of the wildlife. Development or alteration to these rights of ways will reduce and Biodiversity and Geodiversity.</p>	
Local Resident, 14 th May 2024	Policy 32	<p>Policy 32</p> <p>General comment</p> <p>Please include documents listed below and sent in the accompanying email as evidence supporting submission for redesignation of all 12 South Wigston Local Green Spaces currently designated in the 2011-2031 Adopted Local Plan Local Green Space Re-submission 18B Form 2024 STAG Paper 1 Local Green Space June 2016 STAG Forum Slides 8 June 2016 STAG Forum Talk 8 June 2016</p>	Having considered the suggestion, the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.

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		<p>We understand a review of all currently designated Local Green Spaces is scheduled for the next phase of Local Plan preparation. This response and accompanying documents are to inform that review. We understand from Ed Morgan (phone call 12 April '24) that as far as he's aware there's nothing of significance in the new Government requirements that would indicate we have to provide any additional evidence, as nothing has changed in the criteria.</p> <p>IF UPDATED EVIDENCE OF COMMUNITY COMMITMENT IS NEEDED PLEASE ADVISE IN TIME FOR THIS TO BE ORGANISED AND SUBMITTED</p> <p>Comments on the Policy Heading and Policy Text heading.</p> <p>Policy needs to be strategic. We are repeating this point here as well as in the comments on Chapter 10 – because it's so important, and shouldn't get lost for this specific Policy – least of all after we've spent so many years of our lives working on it. We strongly disagree with any of the Natural Environment policies in Chapter 10 being defined as non-strategic. Protecting them is a strategic challenge precisely because they are under threat from presumed development. (The Chapter 10 Title should also be "Protected Places" as in the 2021 18A version) A Google search brings the following definitions:</p> <p>"Strategic": <i>"relating to the identification of long-term or overall aims and interests and the means of achieving them"</i></p> <p>"Non-Strategic": <i>"not helping to achieve a plan"</i></p> <p>The NPPF makes clear that strategic policies should make sufficient provision for: <i>"conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation."</i> (Part 02 para 4.9.d in Borough's 2021 Issues and Options papers) If the</p>	

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		<p>Council refuses a proposal to develop a Local Green Space, the developer could challenge on the grounds that the policy isn't <i>strategic</i>, ergo - the area can't be important enough to protect in the Borough's overall aims and objectives. The NPPF doesn't stop the Council putting all the Chapter 10 natural asset policies as Strategic. They should do so.</p> <p>What the policy needs to do Para 10.5.1 is a good clear statement of intent. Relevant Spatial Objectives Must include Objective 10: Climate Change Supporting Text and Policy Text</p> <ol style="list-style-type: none"> 1. It's good that this is the same as in the current 2011-2031 adopted Local Plan. We view it as essential that it shouldn't be weakened in any way to lessen the current protection from development. It took enormous work collating evidence, and attending the March 2018 Planning Inspector's Hearing, for the wording of the policy strengthened in the 2011-2031 Local Plan. Local people shouldn't have to work so hard to protect natural green space that they value. The stronger wording in the current 18B consultation draft should stay as it is. 2. However, there is one caveat to the points made in para 1. Above. Climate change is a greater risk since 2016. Pressures for increased house building are also greater – as reflected in the Borough's now target of 6,000 homes. The Donnelly/Paragon site will now also be at greater risk due to a major fire and likely redevelopment. Those three specific pressures increase the importance of protecting green space and mature trees from development. <p>We think it is vital to respond to that increased pressure by strengthening the Policy Text by adding an additional paragraph, as in Policy 30 Green Wedge, as follows: <i>"Any proposal that has an adverse impact on the Local Green</i></p>	

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		<p><i>Space will only be permitted where there is a robust and justified need which outweighs these impacts and where a Landscape Character Assessment has been undertaken to ensure that all detrimental impacts that a development may cause have been addressed and can be mitigated.”</i></p> <p>18B Draft Local Plan: Formal submission of South Wigston sites for re-designation as Local Green Space. Designated Sites This is to re-submit the following 12 South Wigston sites for formal re-designation in the new Local Plan, in line with the current designations in the 2011-2031 Plan.</p> <ol style="list-style-type: none"> 1. Wigston Railway Triangle – was a SINC with unimproved grassland, ridge and furrow, wetland, and heathland habitat with one part graded as being of District level ecological value. 2. Donnelly Call Centre frontage on Saffron Rd. Leaseholder changed to Paragon. Ownership, as far as we know, still Drapers Property Ltd. Under much greater threat after the 2023 fire and subsequent site clearance. 3. DEFRA site frontage on Saffron Rd and Tigers’ Rd 4. Territorial Army frontage on Tigers Rd 5. Service Master frontage on Tigers Rd Leaseholder now changed. Ownership, as far as we know, still Drapers Property Ltd. 6. Crete Avenue Green – which also shows signs of once being ridge and furrow. 7. The copse and ‘kick about’ to the West of Ladysmith Rd and Hindoostan Avenue 8. Green Space with protected trees on corner of Ladysmith Rd and Hindoostan Avenue 9. Salvation Army frontage on Saffron Rd 10. Salvation Army green space on South of rear entrance to the site on Ladysmith Rd 	

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		<p>11. Green Space on corner of Namur Rd and Eastern exit of Aisne Rd 12. Grounds and protected trees to rear of Territorial Army on Tigers' Rd N.B. Numbers above are sequential, but different to Appendix 1 and 2 of Nov 2017 Local Green Space Nominated Sites Assessment as 2 sites were not designated: SW2 Rear of Marstown Avenue – deleted by Inspector report March 2019. SW7 Rear of Donnelly site – Council decision not to designate</p> <p>Supporting Evidence In June 2016 significant supporting evidence was submitted, and the areas above confirmed by the Inspectorate as consistent with the NPPF criteria (paragraph 77 of the then extant NPPF). PLEASE CARRY FORWARD ALL EVIDENCE SUBMITTED IN JUNE 2016. The full evidence is listed in the STAG Local Green Space submission Paper 1 – re-submitted here together with a Local Green Space talk and Slides to the South Wigston Residents' Forum. These were sent electronically to Adrian Thorpe on 12 June 2016 @11:03 and 11:07. Additional supporting evidence provided to the Council in June 2016 was as follows: * Hard copy Maps 1-6 showing the Proposed Local green Spaces together with significant data on historical significance. * 23 or more letters and emails from local residents supporting the submission * Minutes of the Forum meeting 8 June 2016 recording full support of Councillors for the submission, and unanimous support of all residents attending.</p>	

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		<p>* Hard copy of STAG submissions One and Two for Site Allocations Call Exercise and supporting evidence – carried forward as back-up evidence of what was then over 15 years of community commitment to protecting the green spaces, by agreement with Adrian Thorpe.</p> <p>IF UPDATED EVIDENCE OF COMMUNITY COMMITMENT IS NEEDED PLEASE ADVISE IN TIME FOR THIS TO BE ORGANISED AND SUBMITTED</p> <p>Update evidence supporting this re-submission Proximity to the community and evidence that the community views it as special This is a compact, unique part of South Wigston with rich wildlife and historical significance. The trees and green spaces are embedded in a densely populated area and make our lives better because of its beauty, its history, the wildlife, its recreational uses, and peoples’ long personal connections. Evidence submitted to the Council in 2016 shows how important these areas are to local residents. Local people have worked to protect these areas for over 25 years, including:</p> <ul style="list-style-type: none"> * surveying Saffron Road trees for the 1997 TPO, * residents stopping an illegal felling on the “Officers’Mess” site in 2000 * replanting trees on that site in 2005 joined by the councillors and MP * working to protect the many mature trees planted in the late 20th century by the then Glen Parva Grange estate through increased TPO designation * attendance of local residents at Development Control meetings, and an Inspector’s Appeal Hearing, to give voice to the importance of retaining TPO trees that are under threat. * 6 unsuccessful submissions to the Forward Plans team to protect the Local green Spaces: Feb and Aug 2007; Nov 	

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		<p>2009; April 2010 – attendance at Inspector’s Hearing; June 2013 – 2 submissions. * 2016 Local Green Space submission – mainly successful * 2018 Inspector’s Hearing – attendance to make a successful case for strengthening the wording of the Local Green Space policy.</p> <p>The 2013 and 2016 evidence carried forward with this re-submission remains substantively relevant, and is updated here. Quite simply, these areas make people’s lives better through informal recreation, contributing to their health through reducing the noise and pollution from the heavy traffic on Saffron Road, and making them feel better because the area is so beautiful and rich with wildlife. These designated spaces fit the Government criteria perfectly of being small, local tracts of land - <i>‘where the green area is demonstrably special to a local community and holds a particular local significance.’</i> Local residents have worked tirelessly to protect their open green spaces for more than a quarter of a century. These aren’t just spaces on a map, but an irreplaceable part of our lives, and the lives of all the creatures we share them with. They need to be kept for generations to come.</p> <p>Why the area is special Beauty and Tranquility Look at the slides, re-submitted alongside this re-submission. Read what people said in their 2016 letters about how the natural beauty of the area made them want to live here, and how it enhances their lives. Those personal connections with the beauty of an area don’t diminish over time, if anything they increase – especially if the area is under threat. Beauty isn’t about data or hard-edged evidence – it is balm to the soul and gives a gentle, natural softening to our lives. Its</p>	

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		<p>very quietness is part of the beauty - and an enormous part of why the Council needs to be strong in the forefront of protecting it.</p> <p>The 2016 Paper 1 submission makes a strong case for the beauty of the area, endorsed by quotes from a Planning Appeal decision. The points made in Paper 1 still stand – please carry those forward as evidence (not withstanding that past Council Landscape Character Assessment and previous Local Plan to 2010 have been superseded.). The area is under much greater pressure since 2016 due to specific local changes and the growing challenge of combatting climate change. Those changes make the importance of the Local Green Space even greater.</p> <ol style="list-style-type: none"> 1. The prison on Tigers' Road has more than doubled in size with increased traffic. It is now a much more obvious and uglier presence along the whole of the eastern edge of the area with significant light pollution at night. It also meant a very significant loss of open grassland, a pond and very substantial numbers of felled mature trees. Those areas have now been covered by buildings and tarmac, with a commensurate loss of mitigation of climate change. 2. The Saffron Rd. Donnelly/Paragon call centre will be redeveloped following the major fire in 2023. The Local Green Space frontage, and TPO trees, will be at particular risk in this case. 3. Climate change is a far greater issue. The 2011-2031 Local Plan has 4 pages and 1 policy compared to the 18B draft with a whole chapter of 14 pages and 5 policies. Green Space and trees are essential elements in mediating climate change. See separate section below. <p>Trees and open green space are part of a whole landscape – separate one from the other and the beauty is diminished. The areas of open parkland and landscape frontages</p>	

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		<p>enhance the beauty of the area – softening the institutional buildings, and acting as a green corridor for wildlife. The beauty of an area isn't damaged unless it is allowed to be. The open areas that were submitted and designated in 2019 when the current 2011-2031 Plan was adopted still remain and enhance the beauty of this area. It is in the Council's power to ensure their future is protected</p> <p>Historical significance. The area has an important history. Please re-read the section in Paper 1 from 2016 – all of which still stands (not withstanding that references to past Council policies and plans have been superseded). The 2016 Paper 1 outlines significant historical background in terms of: the Leicestershire regiment; the Rolleston and Monsell family Glen Parva Grange estate and remaining gate cottages; the 1950s 'army estate' built on the site of the Monsell family manor and grounds; the 'Officers' Mess' on what is now the Salvation Army site; and the previous Council designation of 'Significant Open Urban Space' to that site as giving '...'<i>visual break in the street scene acting as "green lungs" even where access is restricted</i>' ...and providing..... '<i>landscape of considerable quality and amenity value.</i>' (p.18 of Local Plan extant to 2010).</p> <p>Some of the letters submitted to the Council in 2016 in support of protecting the Local Green Spaces are of particular importance – carried forward as part of this re-submission. Do please re-read them. Some residents wrote memories of playing in cornfields here, before the Fairfield estate was built, and a deep personal connection with an area they have known for decades.</p> <p>Recreational Value</p>	

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		<p>The accessible Local Green Spaces in the ex-army base are used by people from all round the area for walking, playing, or just sitting and relaxing. The wide range of uses, and where people come from locally to use the space is outlined in the carried forward Paper 1.</p> <p>A range of national data shows an increase in both leisure walking, and dog ownership since the 2020 Covid pandemic. In line with those national trends, there has been noticeably higher use of the open space on the ex-army base for dog walking, walking generally, and people playing, or sitting to enjoy the tranquility: no surprise for such an easily reached and beautiful area of open ground and trees. The Council's own survey findings for their 2011 Open Space and Recreation Strategy, show use of informal space as much more common and frequent than use of formal sport or leisure facilities. That is especially important for people who have built walking into their lives, having found its benefits during the pandemic.</p> <p>The 18B Spatial Portrait shows the Borough's population has average higher density, older population, and higher levels of unemployment and social deprivation than nationally. That makes protection of access to informal green space even more important as a major contributor to Policy 19 of promoting health and well being. It costs nothing, and the beauty of the open spaces and mature trees through the changing seasons, and varied light and shade, keeps the local area attractive and helps improve peoples' physical health and mental well being.</p> <p>Many of the designated Local Green Spaces are not accessible for recreational use. The Council itself has recognised the importance of green space for peoples' well-</p>	

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		<p>being – even if it isn’t directly accessible. To quote the Council’s own 2011 Open Space Strategy: <i>“A sense of ‘closeness to nature’ with its attendant benefits for people is something that is all too easily lost in urban areas..... Although many natural spaces may not be ‘accessible’ in the sense that they cannot be entered and used by the general community, they can be appreciated from a distance, and contribute to visual amenity.”</i> The importance of that quote hasn’t changed. (The explicit references are in the supporting evidence for the STAG 2013 submissions pages 7+8.)</p> <p>Climate Change Local Green Spaces are vital to this Strategic objective. Some basic data A) The Feb ‘24 global surface temperature ranked warmest in the 175-year record at 1.4°C (2.52°F). NOAA Climate.gov) B) According to NCEI's statistical analysis, there is a 55% chance that 2024 will rank as the warmest year on record and a 99% chance that it will rank in the top five. (National Centre for Environmental Information March 2024 Global Climate Change Report) C) In April 2024 the Met Office predicted 2024 could be the hottest year on record, with temperatures potentially breaching the 1.5°C threshold. D) Global warming has passed an unwelcome milestone according to data released by the EU Climate Monitor in February 2024. The average temperature worldwide was more than the 1.5C threshold during the previous 12 months.</p> <p>Importance of protecting and retaining mature trees and natural greenspace Trees are major contributors in combating climate change. Nearly all the designated Local Green Spaces are well planted with varied species of mature trees.</p>	

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		<p>https://www.woodlandtrust.org.uk/trees-woods-and-wildlife/british-trees/how-trees-fight-climate-change/ Just as importantly, grassland and soils are major contributors to combat global warming.</p> <p>https://www.plantlife.org.uk/wp-content/uploads/2023/08/Grasslands-as-a-Carbon-Store.pdf https://phys.org/news/2022-08-fresh-grasslands-carbon.html Where natural vegetation is lost to new development and replaced by hard surfaces and buildings, that is not only a loss of the natural carbon sink that was there before, but the new development actually magnifies the effects of global warming. Heat is retained in hard surfaces during the day and continues to re-emit that heat into the air overnight – thereby creating circular increase in the ambient temperature. In larger developments with increased roads, traffic, and use of carbon energy through human activity, this can create what’s called ‘the urban heat island’ effect.</p> <p>https://education.nationalgeographic.org/resource/urban-heat-island/ The combined effects of loss of natural green space and mature trees, and replacing them with new housing and related infrastructure is the worst possible policy for combatting climate change. The areas of Local Green Space, Countryside, and Green Wedges are the most important and valuable assets that the Borough has to combat climate change and protect the health and well being of local residents.</p> <p>Richness of wildlife Wildlife habitats have a tipping point whereby erosion of existing sites renders survival of declining species impossible. One of the key strengths of the South Wigston Local Green Spaces is that they are close and relatively</p>	

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		<p>interconnected to still support a significantly diverse range of wildlife – with many species declining and at risk.</p> <p>Bird species. In the past 25 years, several species in this part of the Borough have declined dramatically and some disappeared completely. Significantly, we do still have several species identified by the British Trust for Ornithology Birds of Conservation Concern 2021. That’s really important. Local species changes since 2016 are as follows:</p> <p>BTO red list:</p> <ul style="list-style-type: none"> i) Starling, mistle thrush, yellow wagtail, lesser spotted woodpecker, linnet: all were here, but declined and have now disappeared completely. ii) Greenfinch newly on red list as most at risk – but still here, currently almost daily. <p>Fieldfare – still a winter visitor here but in vastly reduced numbers.</p> <p>BTO amber list:</p> <ul style="list-style-type: none"> i) Grey wagtail – was common here, now gone. ii) Bullfinch, Song Thrush – were common here, now only very occasional iii) Redwing – were common winter visitors here, now much rarer and smaller numbers. ii) 6 birds on the amber list are still here and common. That is vitally important. They are: Tawny Owl, Dunnock, Wren, Wood pigeon, Stock Dove, and Sparrowhawk <p>The open spaces and treescape are essential to the survival of those birds that are still here and common and, even more importantly, to help those in decline to survive, and maybe even grow in number. That certainly won’t be possible if the open spaces are lost to development.</p> <p>Mammals</p> <p>The heavy traffic on Saffron Road and disappearance of front gardens to hard standing have made the small tracts of Local Green Space even more vital for mammals to survive in the</p>	

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		<p>area. There are several urban foxes, and a badger has been seen in the past 3 years, although both are at major risk from traffic and, potentially, human cruelty. Woodmice are common in some parts of the area and vital to the survival of the 'at risk' Tawny Owls. The area still supports a very few remaining hedgehogs – now identified as a species vulnerable to extinction. Around 8-10 years ago, hedgehogs were fairly common here. There is a very healthy population of bats which are dependent on the mature treescape for roosts, and the open green space to catch insect prey each summers' evening.</p> <p>https://www.ceh.ac.uk/alarming-decline-small-mammals-uk https://www.mammal.org.uk/wp-content/uploads/2020/07/MS_RL20_England.pdf</p> <p>Insects</p> <p>The area supports a wide range of insects, including varied species of butterfly, hoverfly, solitary bees, bumblebees, damsel flies, crane flies, dragonflies and beetles. The variety of insect life is highly dependent on a very precarious balance of mixed habitats including proximity to the canal and River Sence, open grassland, some unmanaged scrub and shrubs, mature trees, and a few remaining green gardens.</p> <p>Amphibia</p> <p>The area used to support frogs, newts and toads. They may have been dependent on a small pond, and unmanaged areas of wet land on the prison site which has been cleared since 2020. Sadly the frogs and newts seem to have disappeared since the prison re-development. There is still a very occasional toad sighting during winter hibernation.</p> <p>Although none of the areas of Local Green Space are extensive tracts of land, they do still remain relatively interconnected through the mature trees and remaining gardens on Saffron Road, and the treeline and areas of scrub</p>	

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		<p>along the prison boundary from the railway line up through to Sturdee Rd park. It is as an interconnected whole that the protection of the Local Green Spaces is so vital to the survival of the range of species – many now recognised as endangered. It's up to the Council to arrest the decline, and protect these essential habitats for the remaining species to survive into the future.</p> <p>Conclusion All of the above, in combination with the carried forward 2016 evidence, make an irrefutable case fulfilling the NPPF criteria for Local Green Space designation of all the listed sites.</p> <p>The Council's 2021 Issues and Options consultation had a brilliant sentence in the Introduction. <i>"1.4 Similar to the current Local Plan, the Council is seeking to ensure that there is a balanced strategy that encourages sustainable development and growth across the Borough area, whilst helping to tackle climate change and protecting those areas that most need it."</i></p> <p>The community has fought to protect these Local green Spaces for over 25 years. Only the Council stands between their being protected, or put to the bulldozer and lost for ever. In our view that would be degradation of the Council's duty of, "protecting those areas that most need it."</p>	
Local Resident, 14 th May 2024	Policy 32	<p>Policy 32</p> <p>General comment</p> <p>Add Objective 10 Climate change in Policy 32</p>	Having considered the suggestion, the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.

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Local Resident, 13 th May 2024	Policy 33	<p>Policy 33</p> <p>Supporting</p> <p>I am supporting Policy 33 Green Wedges as I feel it is essential to maintain the green wedge between Oadby & Wigston as it has many benefits for the community in terms of health and also in terms of biodiversity.</p>	Support welcomed.
Local Resident, 6 th May 2024	Policy 33	<p>Policy 33</p> <p>Objection</p> <p>The community of Sutton Close and Tilton Drive, including many other surrounding neighbours strongly object the proposed plan for building residential dwellings (OAD/007)</p> <p>Policy 33 by the council does not allow permission to build residence on the green wedge. Building housing here is going against this council policy. This policy should be supported by all the current residents.</p> <p>Policy 33 green wedge should be maintained between Oadby and wigston.</p> <p>Allows the environmental park to be supported and maintains a Healthy lifestyle, biodiversity. Wildlife corridors. The council should stand by Policy 33, instead of allowing any potential development on the green wedge which goes against the policy itself.</p> <p>Countryside rather than green wedge is where development is better.</p>	Support welcomed.

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Local Resident, 14 th May 2024	Policy 33	<p>Policy 33</p> <p>Support</p> <p>I wish to support strongly Policy 33 on Green Wedges. Since the 1980's, this policy has been fundamental in helping to prevent the merging of urban areas, protecting wildlife habitats, encouraging biodiversity and facilitating access to recreational areas.</p> <p>The list of uses considered to be acceptable within Green Wedges as set out on page 121 of the New Local Plan Consultation Draft makes sense and should continue to be the essence of the Green Wedge policy. The list quite rightly does not include residential development. So, any sites submitted for potential residential development as part of Regulation 18B Site Options process would not conform to policy and should not therefore be considered as appropriate residential sites.</p> <p>My understanding is that the potential supply of housing land including existing commitments and an allowance for windfall sites and conversions would be sufficient to meet identified need without any new residential development on Green Wedge land.</p>	Support welcomed.
Local Resident, 14 th May 2024	Policy 33	<p>Policy 33</p> <p>General comment</p> <p>Add Objective 9 Healthy lifestyles, and objective 10 Climate change in Policy 33</p>	Having considered the suggestion, the Council has made some, but not all, changes. Where it has not taken on the suggestion, this is because the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than

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Local Resident, 10 th May 2024	Policy 33	<p>Policy 33</p> <p>Support</p> <p>It is woeful to get rid of our beautiful countryside and build on it. There should be no residential buildings on designated Green Wedges in line with your Policy 33 on Green Wedges which I support. With the ever-increasing demand for homes, the importance of maintaining Green Wedge spaces also increases. It is imperative to maintain a green wedge between Oadby and Wigston which keeps both towns' identities intact. It also provides a 'green lung' between the urban area and the countryside and prevents merging of urban areas. Green wedges also bring valuable added benefits of health and biodiversity.</p> <p>I also fully support proposals that retain and enhance public access into the Borough's Green Wedges, as well as proposals that retain and enhance the role that the Green Wedges play in the Borough's Green Infrastructure Network and its biodiversity.</p>	<p>previous Plans.</p> <p>Support welcomed.</p>
Local Resident, 14 th May 2024	Policy 33	<p>Policy 33</p> <p>General comment / Objection</p> <p>I am a resident of Oadby and have lived in the Borough for much of my life. For the last 44 years I have lived in The Morwoods.</p> <p>The main concerns I have relate to the impact of the proposed developments on the infrastructure and the already over-burdened services, including education, health provision (It is very rare that I am able to access GP appointments and</p>	<p>One of the driving aims behind the plan is to encourage larger scale development so it can provide the supporting infrastructure new development requires. One of the pieces of evidence is a strategic flood risk assessment that has helped inform potential site allocations.</p>

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		<p>have lately relied upon 111 for health-related matters), loss of green spaces and recreation and the road network to name a few. Looking at the already highly densely populated borough of Oadby and Wigston (by the council's own admission we are one of the most highly populated boroughs outside of London) it is hard to see how any further developments can mitigate against any further burden or loss.</p> <p>Where would the roads be built to accommodate the already clogged and busy roads? There is a real issue in Oadby with parking, parking on the streets, parking on main roads on double yellow lines, parking illegally on pavements and double yellow lines in the town centres. I note some parking has been identified for development which will only increase this behaviour. Maybe developers could fund the appointment of more Traffic Wardens, that would be one way to mitigate what will only be a growing problem.</p> <p>How will the loss of green spaces, green wedges, countryside and climate change be mitigated against? Planting a few trees will not make much difference and will in no way compensate for the permanent loss of all of these. There has to be better provision than that.</p> <p>It will be interesting to see the Infrastructure Delivery Plan when this is available.</p> <p>With the proposed developments taking away what remains the green of Oadby my request is that Oadby and Wigston Borough Council do not compromise on any of these areas, do not consider any exceptions and demand that developers are kept to their plans once agreed.</p>	

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		<p>Water and drainage facilities and flood protection schemes. Flooding is a major problem in Oadby and it can't all be about sustainable growth. There has to be consideration of the existing communities of Oadby.</p> <p>My understanding is that the LLFA's formal flood investigation is ongoing, and the LLFA are continuing to prepare a bid for a Wash Brook catchment study. I also understand that the LLFA have also recently commented on Oadby & Wigston's draft Strategic Flood Risk Assessment, which will inform the updated Local Plan. It would be prudent to wait for the Washbrook Catchment study to be undertaken and take into account the findings for all proposed developments.</p>	
Local Resident, 13 th May 2024	Policy 33	<p>Policy 33</p> <p>Support</p> <p>I support the council policy 33 to maintain the green wedge between Oadby and Wigston.</p> <p>This is because;</p> <ol style="list-style-type: none"> 1) It is reducing the impact of climate change which we are all working hard to reduce, especially for the future generations. 2) The impact on wildlife and biodiversity in the area would be huge. For example having seen the impact from our neighbour cutting down one tree, we went from seeing a lot of birds to not so many. Therefore I can only imagine the negative impact it would have on 	Support welcomed.

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		<p>the wildlife and biodiversity if the green wedge was taken away.</p> <p>3) The wellbeing of locals: Oadby is looked upon a place where there is a lot of green in the area - providing great relaxing walks. This helps with positive mental health. By taking this away and by having lots of roads/houses and less greenery, makes it more chaotic and could have an impact on wellbeing of people in the area.</p>	
Local Resident, 12 th May 2024	Policy 33	<p>Policy 33</p> <p>General comment</p> <p>Page 120 Policy 33: What is the difference between Green Wedge and Green Belt? Government policy is that the Green Belt should be protected except in exceptional circumstances. The Council should commit to protecting the existing Green Wedges particularly the one between Wigston and Oadby. In the supporting text for Policy 33 it states “For the purposes of this Plan the Council may need to release areas of green wedge to provide land for future development. To ensure that the most appropriate areas are released, the Council will undertake a Green Wedge Review”. This provides a loophole to develop within the Green Wedge. The Council needs to strongly commit to preserving the Green Wedges.</p> <p>The rural separation between Wigston and Oadby needs to be maintained. The Green Wedge commands a high position in the landscape. Any development here would be a significant feature seen over a wide area. Once lost the</p>	<p>Green belt is a national designation carried forward by local plans. There is no green belt in Leicestershire. Green Wedge is a local Leicestershire designation that does not have the weight of support given to green belt.</p> <p>Having considered the suggestion, the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.</p>

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		<p>character of the Borough will be changed forever.</p> <p>Add to Policy 33 : The Council remains committed to the retention of the Green Wedges throughout the Plan period. Priority will be given to other green field sites should the need arise</p>	
Local Resident, 6 th May 2024	Policy 33	<p>Policy 33</p> <p>Support</p> <p>I am writing to support Policy 33 that states that no residential building should be built on green wedge site - OAD/007 is a green wedge that separates the Oadby and Wigston settlement. In addition to this it maintain a Healthy environment, protecting biodiversity, and wildlife corridors. Especially as the green wedge land behind Sutton Close and Tilton Drive links to the environment park. Allows the environmental park to be supported and maintains a Healthy lifestyle for all the species found in the nature park.</p> <p>Similarly, sites - WIG/003, WIG/004, WIG/006, WIG/008, WIG/010 are also green wedge.</p> <p>All these sights should be left alone and out of residential development plans. The residential development should be in the countryside.</p> <p>Policy 33 by the council should be supported and no residential building work should take place in these regions.</p>	Support welcomed.
Local Resident, 14 th	Policy 33	Policy 33	Having considered the suggestion, the Council has made some, but not all, changes. Where it has not

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May 2024		<p>General comment</p> <p>Heading and Policy Text Heading</p> <p>Policy needs to be strategic. We are repeating this point here as well as in the comments on Chapter 10 – because it’s so important, and shouldn’t get lost for this specific Policy.</p> <p>We strongly disagree with any of the Natural Environment policies in Chapter 10 being defined as non-strategic. Protecting them is a strategic challenge precisely because they are under threat from presumed development. The Chapter 10 Title should also be “Protected Places” as in the 2021 18A version.</p> <p>A Google search brings the following definitions:</p> <p>“Strategic”: <i>“relating to the identification of long-term or overall aims and interests and the means of achieving them”</i> “Non-Strategic”: <i>“not helping to achieve a plan”</i></p> <p>The NPPF makes clear that strategic policies should make sufficient provision for: <i>“conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”</i> (Part 02 para 4.9.d) in Borough’s 2021 Issues and Options papers) If the Council refuses a proposal to develop in a Green Wedge, the developer could challenge on the grounds that the policy isn’t <i>strategic</i>, ergo - the area can’t be important enough to protect in the Borough’s overall aims and objectives. The NPPF doesn’t stop the Council putting all the Chapter 10 natural asset policies as Strategic. They should do so.</p> <p>What the policy needs to do</p>	<p>taken on the suggestion, this is because the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.</p>

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		<p>10.7.1. Is pretty good.</p> <p>Relevant Spatial Objectives</p> <p>Need to include Objective 9 Healthy Lifestyles and Objective 10 Climate Change</p> <p>Supporting Text and Policy Text</p> <p>Seems to be generally as strong as the Council can manage given the juggernaut of 'presumed development'.</p>	
<p>Local Resident, 14th May 2024</p>	<p>Policy 33</p>	<p>Policy 33</p> <p>Support</p> <p>I support this policy to maintain the green wedge between Oadby & Wigston as:</p> <ul style="list-style-type: none"> • Removing the green wedge would be going against the council policy 33 to reduce the green wedge. • The green wedge in the area was a big contributing factor which attracted us to purchase our property. • Removal of any green areas would have a detrimental effect on wildlife/nature. Green spaces are a feel good factor which has lots of health and wellbeing benefits for all residents. • Having additional traffic through Sutton Close will increase pollution, therefore increasing health issues of residents. 	<p>Support welcomed.</p>

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		<ul style="list-style-type: none"> Taking away green spaces will contribute towards an increase in Carbon Footprints. This will compromise health, cleaner air, water and food and will reduce biodiversity. 	
Local Resident, 12 th May 2024	Policy 33	<p>Policy 33</p> <p>Support</p> <p>The council have been very effective in protecting the Green Wedge and I fully support this policy, which plays an important part in protecting biodiversity and the wellbeing of wildlife, and in reducing the human impact on the climate.</p>	Support welcomed.
Local Resident, 14 th May 2024	Policy 33	<p>Policy 33</p> <p>Support</p> <ol style="list-style-type: none"> I support this policy as removing the green wedge would be going against the council policy 33 to reduce the green wedge. Sutton Close is a close and is not meant for a through road leading to the proposed new housing estate. Removal of any green areas would have a detrimental effect and reduce wildlife/nature. Green spaces are a feelgood factor which has lots of health and wellbeing benefits for residents young and old. The proposed development goes against policy 33 and does not go out into the countryside but adjoins existing housing. 	Support welcomed.

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		4) Impact on wildlife and biodiversity linked to the green wedge, it goes against this and impact of climate change by the decrease in green spaces.	
Local Resident, 6 th May 2024	Policy 33	<p>Policy 33</p> <p>Support</p> <p>We are writing to support Policy 33 that states that no residential building should be built on green wedge</p> <p>Site - OAD/007 is a green wedge that separates the Oadby and Wigston settlement. In addition to this it maintain a Healthy environment, protecting biodiversity, and wildlife corridors. Especially as the green wedge land behind Sutton Close and Tilton Drive links to the environment park. Allows the environmental park to be supported and maintains a Healthy lifestyle for all the species found in the nature park.</p> <p>Similarly, sites - WIG/003, WIG/004, WIG/006, WIG/008, WIG/010 are also green wedge.</p> <p>All these sights should be left alone and out of residential development plans. The residential development should be in the countryside.</p> <p>Policy 33 by the council should be supported and no residential building work should take place in these regions.</p> <p>Thank you for taking time to consider our application.</p>	Support welcomed.
Local Resident, 12 th	Policy 33	Policy 33	Support welcomed.

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May 2024		<p>Support</p> <p>I wholeheartedly support the Green Wedge policy of the council, and recognise the significant part this plays in supporting biodiversity, ensuring a green lung for the borough, and a wildlife corridor linking Brocks Hill Park to the countryside.</p>	
Local Resident, 13 th May 2024	Policy 33	<p>Policy 33</p> <p>Support</p> <p>I'm supporting the council policy 33, which does not allow permission to build residence on the green wedge. Building housing here is going against this council policy.</p>	Support welcomed.
Local Resident, 13 th May 2024	Policy 33	<p>Policy 33</p> <p>Support</p> <p>Support council policy 33 to maintain green wedge</p>	Support welcomed.
Local Resident, 10 th May 2024	Policy 33	<p>Policy 33</p> <p>Support</p> <p>I Completely support the Objectives of this Policy which I consider vital to maintain the principle as set out in the document.</p> <p>I consider it is vital to maintain a Green Wedge between the settlements of Oadby and Wigston at all costs.</p>	Support welcomed.

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		The maintenance of this Green Wedge not only provides separation of the two settlements, but also enhances a physical extension to the Country Park and at the same time improves the Council's ability to address healthy lifestyles, climate change and biodiversity.	
Local Resident, 14 th May 2024	Policy 34	<p>Policy 34</p> <p>General comment</p> <p>Add Objective 9 Healthy lifestyles, and objective 10 Climate change in Policy 34</p>	Having considered the suggestion, the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.
Local Resident, 14 th May 2024	Policy 34	<p>Policy 34</p> <p>General comment</p> <p><u>Heading and Policy Text Heading</u></p> <p>Policy needs to be strategic. We are repeating this here as well as in comments on Chapter 10, because it's so important, and shouldn't get lost for this specific Policy. We strongly disagree with any of Natural Environment policies in Chapter 10 being non-strategic. Protecting them is a strategic challenge precisely because they are under threat from presumed development. The Chapter 10 Title should also be "Protected Places" as in the 2021 18A version. A Google search brings the following definitions:</p> <p>"Strategic": <i>"relating to the identification of long-term or overall aims and interests and the means of achieving them"</i> "Non-Strategic": <i>"not helping to achieve a plan"</i></p> <p>The NPPF makes clear that strategic policies should make sufficient provision for: <i>"conservation and enhancement of the</i></p>	Having considered the suggestion, the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.

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		<p><i>natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.</i>" (Part 02 para 4.9.d) in Borough's 2021 Issues and Options papers) If the Council refuses a proposal to develop in the Countryside, the developer could challenge on the grounds that the policy isn't <i>strategic</i>, ergo - the area can't be important enough to protect in the Borough's overall aims and objectives. The NPPF doesn't stop the Council putting all the Chapter 10 natural asset policies as Strategic. They should do so.</p> <p><u>What the policy needs to do</u></p> <p>10.9.1. First sentence is fine. Second sentence should be strengthened as, for example, 10.7.1 for Green wedges, as follows: "<i>Policy needs to ensure protection of the countryside.</i>"</p> <p><u>Relevant Spatial Objectives</u></p> <p>Need to include Objective 9 Healthy Lifestyles and Objective 10 Climate Change</p> <p><u>Supporting Text and Policy Text</u></p> <p>Could be valuably strengthened with additional paragraphs as in other Chapter 10 policies e.g. as follows:</p> <p><i>"Development that results in the loss or deterioration of Countryside will only be permitted for wholly exceptional reasons where:</i></p>	

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		<p><i>a) there is a robust and justified need and benefits of the development in that location clearly outweigh the loss; and</i></p> <p><i>b) a Landscape Character Assessment has been undertaken to ensure that all detrimental impacts that a development may cause have been addressed and can be mitigated; and</i></p> <p><i>c) It has been robustly demonstrated that any irreplaceable habitat such as trees and hedgerows cannot be retained within the proposed scheme; and ^[L]_[SEP]</i></p> <p><i>d) Appropriate compensation measures are provided on site (off site where this is proven not feasible). The scale and quality of the compensation measures required will be commensurate to the loss or deterioration of the irreplaceable habitat, including long term management and maintenance.”</i> <i>“Planning conditions or obligations</i> <i>“Where appropriate, the Council will use planning conditions or obligations to provide appropriate enhancement and site management measures, and where impacts are unavoidable, mitigation or compensatory measures. Proportionate monitoring fees will be required from the applicant to cover all costs incurred by the Council over the lifetime of all relevant obligations, for example, for the monitoring of schemes on-site or off-site over the 30- year lifetime of those obligations.”</i> <i>“Arrangements and funding for the management and maintenance of green and blue infrastructure over the long term should be identified and implemented. Where appropriate, the Council will seek to secure this via planning obligations, in accordance with the Council’s latest Developer Contributions Supplementary Planning Document.”</i></p>	
Local Resident, 7 th	Policy 34	Policy 34	Having considered the suggestion, the Council believes it has addressed the topic within the Plan

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May 2024		<p>Objection</p> <p>I wish to raise an objection to Policy 34 regarding the protection and management of countryside areas within the Oadby and Wigston Borough. While I understand the importance of safeguarding these areas for their intrinsic value and the multiple contributions they make to society, I believe there are aspects of the policy that require further consideration and revision.</p> <p>Firstly, the policy emphasises the protection of countryside areas from development, which is commendable. However, it falls short in providing clear guidelines on how to balance this protection with the need for sustainable development. While it mentions permitting development where a justifiable need can be demonstrated, it lacks specificity on what constitutes a justifiable need and how it aligns with broader sustainability goals.</p> <p>Furthermore, the policy's emphasis on promoting high-quality management methods is vague and lacks actionable measures. It is crucial to define specific management practices and mechanisms to ensure the preservation of the countryside's openness, beauty, and intrinsic character. Without clear guidelines, there is a risk of inconsistent implementation and inadequate protection of these valuable landscapes.</p> <p>Additionally, while the policy mentions supporting improvements to green infrastructure, such as enhanced access for pedestrians, cyclists, and those with mobility difficulties, it does not provide concrete strategies or commitments to achieve these improvements. Without a detailed plan for enhancing green infrastructure, there is a</p>	<p>and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>risk of neglecting crucial aspects of countryside management, such as biodiversity conservation and recreational opportunities.</p> <p>In summary, while Policy 34 acknowledges the importance of protecting and enhancing countryside areas, it lacks specificity and actionable measures to achieve these objectives effectively. I urge the council to revise the policy to include clear guidelines on sustainable development, actionable strategies for countryside management, and commitments to enhancing green infrastructure. By doing so, we can ensure the long-term preservation and enjoyment of these invaluable landscapes for current and future generations.</p>	
Local Resident, 14 th May 2024	Policy 35	<p>Policy 35</p> <p>General comment</p> <p><u>Headline comments.</u></p> <p>1. It really shouldn't have taken so long for trees, woodlands and hedgerows to be given a formal policy in the plan. We view it as an indictment of a Borough that claimed for years to be 'green'. We were even told by Council officers that the Borough's Tree Strategy couldn't warrant Policy status because it would then need greater compliance, monitoring, and enforcement.</p> <p>2. As far as we can see, it isn't that the Borough has now decided to provide better Policy protection for trees and hedgerows, but, rather, that this Policy appears to be in place because of changes in the NPPF, the new 2023 Regulations, and the 2023 Tree Equity Score. If we are wrong, we apologise for our cynicism. It's the natural result of 20+ years</p>	Having considered the suggestion, the Council believes it has addressed the topic within the Plan and that there is no need for further repetition on the matter. This is in line with the government's aim to keep Plans to an appropriately shorter length than previous Plans.

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		<p>of dedicating so much voluntary time trying to protect the treescape, and often failing. Our experience has been of officers and councillors who often haven't used the powers of protection they have through the TPO system, and haven't demonstrated commitment to ensuring we keep the protected tree canopy we have and replant what we lose. That has been in the face of evidence of non-compliance with the legislation and the PPG. From our perspective, TPO protections have only been reliably followed and enforced for a few years during the tenure of Tony Boswell, Henry Pearson, and Steve Robshaw between around 2015 - 2017.</p> <p>3. Any Policy is only as strong as the officers implementing it, and ensuring compliance through sound follow up and enforcement, and, just as importantly, the Councillors holding them to account. In our decades of experience, the Council track record on protecting and enhancing the tree canopy is not good. It needs to improve dramatically if we are to keep the treescape we have, let alone improve it by replanting, and new planting, with guaranteed funding, maintenance, and management through conditions which are actually enforced.</p> <p><u>Heading and Policy Text Heading</u> Policy needs to be strategic. We are repeating this here as well as in the comments on Chapter 10 – because it's so important, and shouldn't get lost for this Policy. We strongly disagree with any of the Natural Environment policies in Chapter 10 being defined as non-strategic. Protecting them is a strategic challenge precisely because they are under threat from presumed development. The Chapter 10 Title should also be "Protected Places" as in the 2021 18A version. A Google search brings the following definitions:</p>	

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		<p>“Strategic”: <i>“relating to the identification of long-term or overall aims and interests and the means of achieving them”</i></p> <p>“Non-Strategic”: <i>“not helping to achieve a plan”</i></p> <p>The NPPF makes clear that strategic policies should make sufficient provision for: <i>“conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”</i> (Part 02 para 4.9.d) in Borough’s 2021 Issues and Options papers) If the Council refuses a proposal to fell, trees, woodland or hedgerows, the developer could challenge on the grounds that the policy isn’t <i>strategic</i>, ergo - the area can’t be important enough to protect in the Borough’s overall aims and objectives. The NPPF doesn’t stop the Council putting all the Chapter 10 natural asset policies as Strategic. They should do so.</p> <p><u>What the Policy needs to do:</u></p> <p>This needs strengthening. Suggest amending to remove the words <i>“..take the opportunity to..”</i> Their inclusion actually weakens the intention of the Policy. Add in commitment of the Policy contributing to the future, and the importance for health and wellbeing. It should read: <i>“Promoting trees woodland and hedgerows provides society with multiple benefits. The policy will need to protect what exists and improve provision for the future to help mitigate climate change, contribute to peoples’ health and well being, and provide for biodiversity.”</i></p> <p><u>Relevant Spatial Objectives</u></p> <p>Need to add in Objective 9 Healthy lifestyles, Objective 13 Enhancing Local Heritage and Objective 14 Green Wedges.</p> <p><u>Supporting Text</u></p> <p>There need to be additional paragraphs with stronger commitment to actually do things to improve the Borough’s poor tree canopy indicated in para 10.12.4. Without actually</p>	

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		<p>committing to actions the Borough will take, the target of reaching canopy cover of 16.5% by 2050 is just empty words. At minimum, the text should include:</p> <ol style="list-style-type: none"> 1. A paragraph committing to protection of those trees in Conservation Areas, and those covered by TPOs, that includes full implementation of the powers of protection, replanting, and enforcement, for all trees covered by the relevant tree legislation and PPG. 2. A paragraph committing to implementing additional TPOs in those areas with currently higher TPO canopy in order to ensure their future health and longevity. 3. A paragraph committing to planting new trees in the Borough's streets, open spaces, parks, and gardens with relevant TPO coverage, funding and arrangements for maintenance and management. This should be through working with community groups, residents, and partner organisations such as County Highways, the Woodland Trust, and the Tree Council, to source funding, suitable tree stocks, etc and to maximise local 'ownership' of improved tree canopy for the future. <p>Without such commitments as in those 3 suggestions, however can any target for improved canopy be even approached, let alone reached? Just as importantly, in our view, if compliance with the tree protection legislation and PPG doesn't improve, it could be reasonably argued that the Council is in dereliction of its duty to protect the health and longevity of the protected trees we currently have.</p> <p><u>Policy Text: Objections and suggestions</u> Overall, we view this as weak and lacking commitment to preserving the trees, woodland, and hedgerows that are on proposed sites for development. It leaves way too many loopholes for developers to just bulldoze. There is also no</p>	

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		<p>commitment to actively improve the tree canopy in the rest of the Borough – ‘encouraging’, as in the last para of the text will achieve nothing.</p> <p>We think the policy text should be completely re-written taking account of the following points, and showing stronger commitment to protection for the future.</p> <p><u>Policy Text</u></p> <p>1. There needs to be a policy commitment to issue TPOs, and formal relevant hedgerow protection, on any site proposed for development. It has to be very early in the process of assessment of suitability, before any approval in principle - otherwise the usual risk is that trees and hedgerows just get bulldozed. No idea how that needs to be worded. But the Council has to find ways to ensure protection is put in place, to prevent such destruction.</p> <p>2. The Policy Text offers no-where near as much protection as, for example, Policy 30 for green and blue infrastructure, Policy 31 for Biodiversity and geodiversity, or Policy 33 Green Wedges. Those policies set out a range of requirements on developers for robust evidence before any loss can be agreed, mitigation, fees, and future funding management and maintenance. None of those vital issues are even mentioned in this text for trees, woodland, and hedgerows. Why not? Are they less important for climate change, health and well being, biodiversity? No. So why don't they have the same robust protections to ensure longevity? Look at the following examples from this same 18B draft Plan:</p> <p>From Policy 33 Green Wedge:</p> <p><i>“Any proposal that has an adverse impact on the Green Wedge will only be permitted where there is a robust and justified need which outweighs these impacts and where a Landscape Character Assessment has been undertaken to</i></p>	

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		<p><i>ensure that all detrimental impacts that a development may cause have been addressed and can be mitigated.”</i></p> <p>From Policy 31 Biodiversity and geodiversity</p> <p><i>“Development that results in the loss or deterioration of an irreplaceable habitat (such as ancient woodland, ancient or veteran trees, and ancient hedgerows) will only be permitted for wholly exceptional reasons where:</i></p> <p><i>a) The need and benefits of the development in that location clearly outweigh the loss; and</i></p> <p><i>b) It has been robustly demonstrated that the irreplaceable habitat cannot be retained within the proposed scheme; and</i></p> <p><i>c) Appropriate compensation measures are provided on site (off site where this is proven not feasible). The scale and quality of the compensation measures required will be commensurate to the loss or deterioration of the irreplaceable habitat, including long term management and maintenance.”</i></p> <p>Also in the same Policy 31</p> <p><i>“Planning conditions or obligations</i></p> <p><i>“Where appropriate, the Council will use planning conditions or obligations to provide appropriate enhancement and site management measures, and where impacts are unavoidable, mitigation or compensatory measures. Proportionate monitoring fees will be required from the applicant to cover all costs incurred by the Council over the lifetime of all relevant obligations, for example, for the monitoring of schemes on-site or off-site over the 30- year lifetime of those obligations.”</i></p> <p>Similar funding and longevity measures are in Policy 30 for green and blue infrastructure.</p> <p><i>“Arrangements and funding for the management and maintenance of green and blue infrastructure over the long term should be identified and implemented. Where appropriate, the Council will seek to secure this via planning obligations, in accordance with the Council’s latest Developer Contributions Supplementary Planning Document.”</i></p>	

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		<p>In our view, the Policy Text should be re-written to include requirements on developers as in your own example policy wording above, for: robust evidence and assessment criteria before any loss can be agreed; mitigation; fees; future funding, management, and maintenance etc. Your own wording as above can be used to give trees, woodland, and hedgerows which are not formally designated stronger protection from the bulldozer.</p> <p>3. The Policy Text is almost entirely about new development. There's no strong commitment to saving what we have, and planting and protecting new trees throughout the Borough as a whole. The final paragraph 'encouraging' tree planting is nowhere near strong enough for what is needed. The text should include the 3 paragraphs as suggested in the Supporting Text comments above. Otherwise the Policy is just words, but doesn't actually commit to any tangible actions and monitoring to improve the Borough's tree canopy as a whole.</p>	

Chapter 11 – Monitoring and Implementation (Policy 37)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received

Appendix 1 – Oadby Site Options (OAD/001 – OAD/015)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Local Resident, 9 th May 2024	OAD/002	<p>Land South of Gartree Road</p> <p>Objecting</p> <p>I Object on the above planning reference number.</p> <p>The area will have full impact in the area</p> <ul style="list-style-type: none"> • local character (including landscape setting); • safe, connected and efficient streets; • a strong network of green spaces (including parks) and public places; • crime prevention; • high quality architecture; • access, inclusion and health; • efficient use of natural resources; • cohesive and vibrant neighbourhoods; • air quality and air quality management; • sustainable construction; and, • climate change. <p>As you can see the impact which has happened and is happening after the houses which were built in the Stoughton area which is affecting all routers to outer oadby.</p> <p>This points were stated on the Stoughton development but see the impact its having now, so in short words its all talk and writing and nothing has been taking seriously and into consideration and this is always the case.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local	OAD/002	Land South of Gartree Road	The Council has undertaken considerable work to

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Residents, (family of 6), 15 th May 2024		<p>Objecting</p> <p>We are taking legal advice, as we have fully redone our house with balconies to appreciate the view hence why we purchased the property. We do not want to see houses behind our house on MANOR ROAD EXTENSION. From behind Gartree road.</p> <p>We want preserve the beautiful countryside behind us and so our neighbourhood doesn't become a large building site in the medium term, and a congested gateway to a large housing estate in the longer term.</p>	<p>inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 11 th May 2024	OAD/002	<p>Land South of Gartree Road</p> <p>Objecting</p> <ul style="list-style-type: none"> - Along with multiple local residents of Oadby, I strongly object to these plans to convert active farmland into a major housing estate. There are numerous reasons for this objection. - All local residents will appreciate the significant eyesore, traffic disturbance, and recurrent flooding caused by the already unnecessary housing development at the corner of Gartree Road and Stoughton Road. Daily traffic on Stoughton Road is at a standstill at peak hours and there have been increased road traffic collisions on Gartree Road due to the increase in traffic. Similarly, the catchment population of the Copse Close schools has increased, causing more congestion on residential streets and anti-social behaviour to the local residents, which has been reported to the schools and police regularly. Adding another mass housing estate will simply compound this problem. 	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<ul style="list-style-type: none"> - First and foremost, Oadby simply does not have a need for additional housing capacity. The capacity problems affecting the City of Leicester do not need to be remedied by destroying green farmlands in Oadby. 1000 additional homes are being built beyond the needs of our local region, and there are far more sites further afield that would have a lower impact upon existing residents and infrastructure. - The proposed land is currently a working farm and houses numerous wildlife including badgers, foxes, rabbits, and birds (including owls). Destroying this land would destroy the local ecosystem for these animals. Utilising brownfield land elsewhere (rather than greenfield) is a far less destructive option. - Adding demand upon local schools and roads will simply lead to a reduction in quality of education and traffic congestion, resulting in more accidents and impaired quality of life for the residents of Oadby. The resultant deadlock on Gartree Road and Stoughton Road will spill over to the mini roundabouts of Copse Close and Manor Road Extension, causing major disruption to local businesses and schools, as well as local residents and their daily commutes. - Local infrastructure including plumbing will suffer significantly as there is already mass flooding on Gartree Road whenever there is rain. Furthermore, the proposed farmland forms part of the natural rainwater drainways from Copse Close and Manor Road Extension, so building upon it will simply exacerbate this unfixable problem. - The public rights of way are popular exercise routes for local residents and their pets; destroying these walkways with low quality housing would disrupt the local greenspace for residents as there are no other local parks in the vicinity of this part of Oadby. - In summary, I strongly object to this portion - and indeed all greenfield expansions - in the region, as these are simply 	

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		unnecessary and will place immense burden upon already stretched local infrastructure and amenities.	
Local Resident, 14 th May 2024	OAD/002	<p>Land South of Gartree Road</p> <p>Objecting</p> <p>I am writing to comment specifically on the following submissions as Site Options.</p> <ul style="list-style-type: none"> • OAD/002, Land South of Gartree Road, Oadby • OAD/009, Land South of Gartree Road and East of Stoughton Road, Oadby (Primary Masterplan) • OAD/010, Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 1) • OAD/011, Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 2) <p>These submissions would have a very significant impact upon the character of the local area and would result in building on greenfield land which currently forms part of the Oadby and Wigston Green Wedge north of Manor Road Extension and Copse Close.</p> <p>1. Impact on Green Wedge: The submitted sites above directly contradicts the Borough Council's existing environmental plan, which aims to preserve green wedges. The proposed sites above all fall within one of the Green Wedges noted in 2.5.2 of the Spatial Portrait of the Local Plan. These areas are vital for maintaining the character and ecological balance of Oadby.</p> <p>2. Impact on Biodiversity:</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>The submitted sites note the established hedgerows and mature trees and which provide an important habitat for insects, small mammals, and birdlife. The development would have a detrimental effect on biodiversity, disrupting a long-established ecosystem. The Spatial Portrait of the Local Plan notes the patchy level of tree cover across the borough and these proposed developments would significantly damage tree cover.</p> <p>3. Impact on Road Transport. The sites above would lead to increased traffic congestion: The local roads are already facing significant congestion issues, in particular Gartree Road, Stoughton Road and Manor Road have increased in traffic significantly due to recent development in the land opposite and adjacent to Stoughton Grange Farm. Additional housing will only exacerbate the problem. This is already noted in section 2.4.1 of Spatial Portrait of the Local Plan: <i>'Due to this poor access to main arterial routes and the fact that the three routes into Leicester City from the south pass through the Borough, the Borough's roads suffer from significant congestion, particularly at peak times.'</i></p> <p>4. Impact on Local Services. NHS GP & Dental services are already under considerable strain. The creation of a further 600-450 homes within this area would put considerable pressure upon Severn Surgery which is already struggling to cope with the current population. Similarly, Manor High School is highly oversubscribed, despite increasing pupil numbers from August 2024.</p> <p>5. Impact on Farmland & food security. Although beyond the scope of the current local plan, the proposed sites would lead to a direct loss of arable land, which would damage national</p>	

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		<p>food security plans developed in the 2024 Farm to Fork Summit.</p> <p>While I recognise that it is important the Borough Council works to meet local housing need and support much of the plan's aims, Site Options OAD/002, OAD/009, OAD/010, OAD/011 are unsuitable. I note that these will be subject to independent scrutiny by a Planning Inspector following the creation of the Local Plan and I trust that these proposals will be rejected given their negative local impacts.</p>	
<p>Local Resident, 14th May 2024</p>	<p>OAD/002</p>	<p>Land South of Gartree Road</p> <p>Objecting</p> <p>I have been a resident in my property at 21 Manor Road Extension since November 2019. One of the main reasons we bought our property was because of the outstanding views and local public walk ways and wild life including owls, bats, badgers, foxes and muntjacs.</p> <p>When we came to hear of the potential development of 467 dwellings, we were alarmed at the thought of losing the glorious views and the knock-on effect it would have on the local wildlife.</p> <p>Please see my points below which are cause for concerns and my reasons to object the development:</p> <ul style="list-style-type: none"> • It will have a detrimental impact on the wild life and native species of plants by loss of natural habit for animals, which has been presents for hundreds of years, and will have a significant visual impact on the landscape. 	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<ul style="list-style-type: none"> • Has the council investigated for the presence of greater crested newts in this region? These are protected under the Wildlife and Countryside Act and the Conservations of Habitats and Species Regulations 2010. • The construction will last years and will lead to pollution, noise, congestion, traffic and a strain on local amenities, schools and bus services. There are not enough bus routes and frequency of buses, which will lead to more car use and pollution. 467 homes will lead to a minimum increase of 467 cars in this part of Oadby. Local schools are already at maximum capacity with waiting lists for children. GP's (general medical practitioners) are oversubscribed and waiting times are unacceptable, the development of the new homes will add further detriment to GP services. • There will also be a potential increase in crime which is bad enough in Oadby, please see the local crime statistics. • My wife and daughter also suffer from allergies which will only be aggravated by the dust and pollution created by the building work. • We also have a 2 months old baby, who's daytime sleep will be disturbed by construction during the day time. • I understand that the area is often heavily saturated following significant amounts of rainfall and I have noticed flooding in the fields which causes me concern about water drainage and the potential for a water table to be created. As you may be aware, the soil in Leicester has a high quantity of clay in it which drains surface water very poorly. I have noticed more flooding and more houses will lead to less ground being available to take the water and then lead to flooding elsewhere and drain overflow. • In addition, there is a significant safety concern due to the proximity to the local airport. The flight path for take off and landing lies immediately over the proposed development site, over which the plane will be flying at low altitude. This poses 	

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		<p>a serious risk especially as this is a training airport for pilots. In addition, during the construction work I am sure there will be cranes in use, which will be dangerously close to the low flying planes. The construction work itself will create dust and dirt which poses a danger to the low flying planes flying over the area highlighted for development.</p> <ul style="list-style-type: none"> • The development itself will lead to a loss of privacy for all residents of Manor Road Extension and Copse Close as this area was not previously over looked and the development itself will be totally out of character for the appearance of the rest of the area, where homes were built over 70 years ago. • The road infrastructure is very narrow in these parts of Oadby in particular Shady Lane (which is a very heavily used through road between Evington and Oadby), Gartree Road and Stoughton drive. The roads will not be able to cope with increased traffic flow which could 4 Preferred Options (Regulation 18B) Draft Local Plan Consultation (Wednesday 3 April 2024 – Wednesday 15 May 2024) Regulation 18B Preferred Options – Submission Form lead to an increase in road traffic accidents. The traffic flow increase can be demonstrated around the new houses already built around Stoughton Farm Park. Modern housing is built on a much smaller scale and capacity for parking personal cars is much less, this will lead to cars parked on narrow roads and thus create a health and safety risk. • This type of development in Leicester and Leicestershire has already led to less green fields which in turn leads to less leisure and fresh air. Dog walkers are using this field every day. At a time such as COVID lockdown, these are the things which people valued the most. <p>I implore you consider all the above and I would like to make it clear that I am putting forward my firm objection to this construction due to the grounds I have stated. I would like a</p>	

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		full response to all my points.	
Local Resident, 15 th May 2024	OAD/002	<p>Land South of Gartree Road</p> <p>Objecting</p> <p>I object to the development of new builds on fields behind Copse Close and Manor Road extension.</p> <p>My reason of objection are of the following.</p> <ul style="list-style-type: none"> • Impact on local services – need for additional school places and strain on local GP practices with Severn Surgery already struggling. • Impact on traffic with local roads already congested. • Impact on wildlife and hedgerows for insects, small mammals and birdlife. • Impact on footpaths and right of way used for leisure and dog walking. • Loss of green wedge which is part of council's environmental plan. • Housing planned in areas without significant employment for residents. • Change of landscape of Oadby and Leicestershire and potential impact on the value of properties. 	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 17 th May 2024	OAD/002	<p>Land South of Gartree Road</p> <p>Objecting</p> <p>My husband and I would like to object to the above plan</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>There is already flooding on Gartree road since the building of new houses near Shady lane and this plan is likely to worsen this.</p> <p>There does not seem to be any thought to improve infrastructure namely roads and drainage and schools and we fear this will worsen traffic congestion as well as increase risk of flooding. The daily commute to and from work will lengthen.</p> <p>Loss of the green areas will affect people's mental health as well</p>	<p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
<p>Local Resident, May 2024 (Note - this comment has been submitted 8 times by 8 individual persons)</p>	<p>OAD/002</p>	<p>Land South of Gartree Road</p> <p>Objecting</p> <p>I am writing to formally object to the proposed housing development as part of the 2021-2041 Local Plan, which includes building on the green space behind Copse Close (Oad/002), where I reside. Specifically my objection relates to Oad/002, Oad/009, Oad/010, Oad/111 and Oad/002 is grounded on the following points:</p> <ol style="list-style-type: none"> 1. **Loss of Green Wedge**: The proposed development directly contradicts the council's environmental plan, which aims to preserve green wedges. These areas are vital for maintaining the character and ecological balance of Oadby. 2. **Impact on Footpaths & Right of Way**: The green space in question is a popular area for dog walking and leisure activities. Building on this land would deprive the community 	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>of a valuable recreational resource and disrupt the existing footpaths and rights of way.</p> <p>3. **Impact on Wildlife**: The hedgerows and green spaces serve as an important habitat for insects, small mammals, and birdlife. The development would have a detrimental effect on biodiversity, disrupting the ecosystem that has thrived here for years.</p> <p>4. **Increased Traffic Congestion**: The local roads are already facing significant congestion issues. Additional housing will only exacerbate the problem, leading to longer travel times and reduced road safety.</p> <p>5. **Strain on Local Services**: Our local services, particularly educational institutions and GP practices, are under strain. Severn Surgery is already struggling to cope with the current population. The additional residents would further overwhelm these services, especially the need for more school places.</p> <p>6. **Lack of Employment Opportunities**: The housing is planned for areas that do not have significant employment opportunities. This could lead to increased commuting and its associated problems, rather than fostering a self-sustaining community.</p> <p>I strongly request the council to consider these objections seriously and recognise the negative impacts such a development would have on the community of Oadby and the local environment. I urge you to uphold the principles of sustainable development and reject the proposed plan.</p>	
Local	OAD/002	Land South of Gartree Road	The Council has undertaken considerable work to

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Resident, 16 th May 2024		<p>Objecting</p> <p>Deeply concerned with recent plans to develop new houses in above area. This area is fast becoming very congested with recent developments in this area & strongly object to new plans to make it worse</p>	<p>inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 11 th May 2024	OAD/002	<p>Land South of Gartree Road</p> <p>Objecting</p> <p>This local plan represents the systematic large scale eradication of green space and countryside around Oadby, and will have a permanent detrimental effect on the character of Oadby including the gap between Oadby and Wigston filled in with housing, and development all around the edge of Oadby.</p> <p>The communication of this has incredibly poor, to the point of dishonesty, with many Oadby residents still being unaware despite the gravity and importance of this consultation. I request that the consultation period is extended to allow proper communication, including leaflet drop/ email to Oadby and Wigston residents.</p> <p>In addition, the house building aspect of this plan is built on a false premise. Over 1000 of the 5,040 homes proposed to be built in Oadby and Wigston over the 21 years of the plan are NOT for local need, but the result of the council voting to accept overspill housing from Leicester city, despite there</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p> <p>The Council is committed to ensuring that residents of the Borough have access to appropriate local services and facilities. The New Local Plan will be a key factor in ensuring that such facilities and services are realised in the longer term. The Council is also required by Government, to provide new homes that meet local needs. Unmet housing needs from neighbouring local authorities can form part of local housing needs.</p> <p>Paragraph 24 of the National Planning Policy Framework (NPPF) states that '<i>Local planning</i></p>

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		<p>being no legal requirement to do this and there being many more currently derelict brownfield sites in the City which have not yet been explored.</p> <p>This response relates to Oad/002, Oad/009, Oad/010 and Oad/111, which are part of the Oadby portion of the Oadby, Thurnby and Stoughton green wedge.</p> <p>As stated in Policy 33, green wedges are valuable areas of green land within the Borough. In 2017 Oadby and Wigston council stated that:</p> <ul style="list-style-type: none"> • The part of the green wedge that is situated within the Borough of Oadby and Wigston prevents the merging of Oadby with parts of Leicester around the golf course that branch out towards the village of Stoughton. • The green wedge plays a key role in the green infrastructure network of the Borough and ensures there is a continuous network running from Leicester City to the countryside areas of the Borough and Harborough District beyond. • The green wedge boundary is distinctly defined; it is very much urban one side, open green wedge (and its associated 37 infrastructure) the other. • The green wedge spans local authority boundaries with Leicester City and Harborough District and provides a 'green lung' stretching from the more inner city urban areas of Leicester City to the open countryside areas of the Borough and Harborough District. • As well as providing access to the countryside for the Borough's human population, the green wedge is a key part of the Borough's green infrastructure network which enables species 	<p><i>authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries</i>'. Housing need is a cross boundary matter for all local authority areas within the Leicester and Leicestershire Housing Market Area, therefore cannot be ignored.</p> <p>The NPPF further states at paragraph 26 states that <i>'effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere'</i>.</p> <p>NPPF paragraph 67 goes onto state that <i>'strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment...'</i></p> <p>In 2022, Local Authorities within the Leicester and Leicestershire Housing Market Area agreed a Statement of Common Ground (SoCG) in relation to Leicester City's declared unmet housing and</p>

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		<p>to use features within all elements of the Borough's rural and urban landscape.</p> <p>Policy 33 states that the Council will retain these areas as open and undeveloped. However site allocations listed above contradicts this as they form the bulk of this green wedge. The Regulation 18b local plan proposes several options which in effect eliminates this green wedge in almost its entirety, except for the majority of the University playing fields. This would have a significantly detrimental effect on the local area.</p> <p>These fields are an essential green lung that are used by walkers, runners and wildlife enthusiasts where they act as an open and undeveloped recreational resource. They host a wide range of species including bats, badgers, deer, stoats, kestrels, buzzards and red kites. The destruction of this countryside would represent a historic and catastrophic change to the character of Oadby.</p>	<p>employment needs. As part of this SoCG, the Council agreed the principle of accommodating a portion of Leicester City's unmet housing need. Unless evidence suggests otherwise, the Council will be required through the SoCG to accommodate a portion of Leicester City's unmet housing need within the New Local Plan.</p> <p>It is clear from the above, that the Council has a duty to take account of the unmet housing needs of other local authority areas. The ability for the Council to accommodate additional unmet housing needs of neighbouring local authorities will be evidence led. The Council has prepared the necessary evidence, which has informed the Regulation 19 Pre-Submission Draft Plan.</p>
Local Resident, 15 th May 2024	OAD/002	<p>Land South of Gartree Road</p> <p>Objection</p> <p>I did, eventually find the maps and aerial photographs relating to the sites that have been offered for development. I note that the ones in Oadby, notably, OAD 002; OAD 009; OAD 0010; OAD 0015 constitute a very large proportion of the green wedge between the Borough and the city, which the plan expressly says is very important. I do not think this land should be build on as it provides an essential "green lung" for the local population.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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Local Resident, 7 th May 2024	OAD/004	<p>Land North of Manor Road, Oadby</p> <p>Objection</p> <p>I am writing to formally object to the proposed housing development in front of my property at 2 Manor Close. While I understand the need for new housing, there is no need here. I have several concerns about the impact of this development on my quality of life and the surrounding area.</p> <p>Firstly, the proposed development will significantly obstruct my views and access to natural light, affecting my daily living conditions. The aesthetic change to the landscape will diminish the visual appeal of the area and negatively impact property values.</p> <p>Secondly, the increased population density from the new development will likely lead to additional traffic congestion on our roads. This may result in safety issues for residents, particularly for children and elderly individuals who walk or cycle in the area.</p> <p>Thirdly, I am concerned about the potential environmental impact of the construction process and the ongoing development. The increase in noise, dust, and other pollutants will disrupt the peaceful atmosphere of the neighbourhood.</p> <p>Lastly, I worry about the strain on local infrastructure, including schools, healthcare facilities, and utilities. The proposed development could put undue pressure on these resources, affecting the overall quality of life for existing residents.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		I urge the council to reconsider and reject this proposal to minimise the impact on current residents.	
Local Resident, 14 th May 2024	OAD/004	<p>Land North of Manor Road, Oadby</p> <p>Objection</p> <p>I am writing to formally object to the proposed housing development in front of my property at 3 Manor Close. While I understand the need for new housing, there is no need here. I have several concerns about the impact of this development on my quality of life and the surrounding area.</p> <p>Firstly, the proposed development will significantly obstruct my views and access to natural light, affecting my daily living conditions. The aesthetic change to the landscape will diminish the visual appeal of the area and negatively impact property values.</p> <p>Secondly, the increased population density from the new development will likely lead to additional traffic congestion on our roads. This may result in safety issues for residents, particularly for children and elderly individuals who walk or cycle in the area.</p> <p>Thirdly, I am concerned about the potential environmental impact of the construction process and the ongoing development. The increase in noise, dust, and other pollutants will disrupt the peaceful atmosphere of the neighbourhood.</p> <p>Lastly, I worry about the strain on local infrastructure, including schools, healthcare facilities, and utilities. The proposed development could put undue pressure on these</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>resources, affecting the overall quality of life for existing residents.</p> <p>I urge the council to reconsider and reject this proposal to minimise the impact on current residents.</p>	
<p>Local Resident, 7th May 2024</p>	<p>OAD/004</p>	<p>Land North of Manor Road, Oadby</p> <p>Objection</p> <p>I am writing to formally object to the proposed housing development in front of my property at 2 Manor Close. While I understand the need for new housing, there is no need here. I have several concerns about the impact of this development on my quality of life and the surrounding area.</p> <p>Firstly, the proposed development will significantly obstruct my views and access to natural light, affecting my daily living conditions. The aesthetic change to the landscape will diminish the visual appeal of the area and negatively impact property values.</p> <p>Secondly, the increased population density from the new development will likely lead to additional traffic congestion on our roads. This may result in safety issues for residents, particularly for children and elderly individuals who walk or cycle in the area.</p> <p>Thirdly, I am concerned about the potential environmental impact of the construction process and the ongoing development. The increase in noise, dust, and other pollutants will disrupt the peaceful atmosphere of the neighbourhood.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>Lastly, I worry about the strain on local infrastructure, including schools, healthcare facilities, and utilities. The proposed development could put undue pressure on these resources, affecting the overall quality of life for existing residents.</p> <p>I urge the council to reconsider and reject this proposal to minimise the impact on current residents.</p>	
<p>Local Resident, 10th May 2024</p>	<p>OAD/004</p>	<p>Land North of Manor Road, Oadby</p> <p>Objection</p> <p>I am writing to express my strong opposition to the proposed plans for the development of dwellings on the horse paddocks within our community. As a resident deeply invested in the well-being and integrity of our neighbourhood, I urge the council to reconsider these plans due to the numerous adverse effects they would have on our community and its residents.</p> <ol style="list-style-type: none"> 1. Increase in Traffic: The construction of additional dwellings would inevitably lead to a significant increase in traffic congestion on our already narrow roads. These roads are ill-equipped to handle the current volume of traffic, let alone the influx that would result from this development. This congestion not only poses a danger to residents but also compromises the accessibility of emergency vehicles, potentially endangering lives in critical situations. 2. Loss of View: Many of us chose to purchase homes in this area for the breathtaking views it offers. The 	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>proposed development threatens to obstruct these views, which were a significant factor in our decision to settle here. The loss of these views not only diminishes the aesthetic appeal of our neighbourhood but also undermines the investments we have made in our homes.</p> <p>3. Narrow Roads for Emergency Traffic: The narrow roads in our community already present challenges for emergency vehicles. The increased traffic resulting from the proposed development would exacerbate these challenges, potentially delaying response times and endangering lives in emergency situations.</p> <p>4. Noise: The introduction of more residents into the area would inevitably lead to an increase in noise pollution. This not only disrupts the peace and tranquility that we cherish but also has detrimental effects on our physical and mental well-being.</p> <p>5. Increase of Crime: The proposed development also raises concerns about an increase in crime. With more people comes a higher likelihood of disturbances and antisocial behaviour, threatening the safety and security of our community.</p> <p>6. Shading and Lighting: The shading and lighting from the new dwellings could negatively impact the surrounding properties, affecting the natural sunlight and ambiance that we currently enjoy. This could have adverse effects on both our physical and mental well-being.</p>	

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		<p>7. Dangerous Traffic Conditions for Elderly and Younger Children: The increase in traffic resulting from the development poses a significant threat to the safety of vulnerable individuals such as the elderly and young children. Our narrow roads are already hazardous, and the additional traffic would only heighten the risk of accidents and injuries.</p> <p>8. Impact on Mental Health: Finally, I must emphasise the profound impact that this development would have on the mental health of my family. My wife suffers from chronic claustrophobia, and the open space surrounding our home provides her with a sense of calm and safety. The prospect of having a house built directly opposite ours would undoubtedly trigger her condition, leading to severe distress and anxiety. This, in turn, would have a ripple effect on our family dynamics and well-being.</p> <p>Considering these compelling concerns, I urge the local council to reconsider the proposed plans for development on the horses' paddocks. Instead, I implore you to explore alternative solutions that prioritize the preservation of our community's unique character, safety, and the mental well-being of its residents.</p> <p>Thank you for considering the perspectives and concerns of the residents in your decision-making process. I trust that you will make the decision that is in the best interest of our community and its future generations.</p>	

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Local Resident, 7 th May 2024	OAD/004	<p>Land North of Manor Road, Oadby</p> <p>Objection</p> <p>I am writing to formally object to the proposed housing development in front of my property at 9 Manor Close. While I understand the need for new housing, there is no need here. I have several concerns about the impact of this development on my quality of life and the surrounding area.</p> <p>Firstly, the proposed development will significantly obstruct my views and access to natural light, affecting my daily living conditions. The aesthetic change to the landscape will diminish the visual appeal of the area and negatively impact property values.</p> <p>Secondly, the increased population density from the new development will likely lead to additional traffic congestion on our roads. This may result in safety issues for residents, particularly for children and elderly individuals who walk or cycle in the area.</p> <p>Thirdly, I am concerned about the potential environmental impact of the construction process and the ongoing development. The increase in noise, dust, and other pollutants will disrupt the peaceful atmosphere of the neighbourhood.</p> <p>Lastly, I worry about the strain on local infrastructure, including schools, healthcare facilities, and utilities. The proposed development could put undue pressure on these resources, affecting the overall quality of life for existing residents.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>I urge the council to reconsider and reject this proposal to minimise the impact on current residents.</p> <p>Thank you for your attention to this matter. I look forward to your prompt response and consideration of my objection</p>	
Local Resident, 7 th May 2024	OAD/004	<p>Land North of Manor Road, Oadby</p> <p>Objection I am writing to formally object to the proposed housing development in front of my property at 3 Manor Close. While I understand the need for new housing, there is no need here. I have several concerns about the impact of this development on my quality of life and the surrounding area.</p> <p>Firstly, the proposed development will significantly obstruct my views and access to natural light, affecting my daily living conditions. The aesthetic change to the landscape will diminish the visual appeal of the area and negatively impact property values.</p> <p>Secondly, the increased population density from the new development will likely lead to additional traffic congestion on our roads. This may result in safety issues for residents, particularly for children and elderly individuals who walk or cycle in the area.</p> <p>Thirdly, I am concerned about the potential environmental impact of the construction process and the ongoing development. The increase in noise, dust, and other pollutants will disrupt the peaceful atmosphere of the neighbourhood.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>Lastly, I worry about the strain on local infrastructure, including schools, healthcare facilities, and utilities. The proposed development could put undue pressure on these resources, affecting the overall quality of life for existing residents.</p> <p>I urge the council to reconsider and reject this proposal to minimise the impact on current residents.</p>	
Local Resident,	OAD/004	<p>Land North of Manor Road, Oadby</p> <p>Objection</p> <p>Re. Land North of Palmerston Way – Institutional or similar style use.</p> <p>I have taken a comprehensive approach in the inclusion of the number of recipients in this communication to ensure that the issues are highlighted to the correct audience and so these people can then ensure that the issues can be mitigated, and the impact on residents minimised.</p> <p>We have been made aware of the <i>Oadby and Wigston Council Local Plan changes</i>, noting for the record that no communication has been received by residents through <i>official channels</i>, but just chance word of mouth. This is very disappointing, as while the proposed development would be within the Oadby and Wigston boundary, the impacts would be felt very strongly in the Knighton ward of the city.</p> <p>The site is currently fenced off and unused. It has a number of mature trees and a Silver birch woodland. It acts as a haven for wildlife, including Badgers and Foxes, and a noise buffer between the busy A6 / Palmerston Way road systems and the residents of South Knighton. Geographically it follows the slope of the road and filters water down into a small brook, that then winds its way, often underground, through South Knighton. The brook is a <i>known flood risk</i> and several</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>times in 2023 it flooded and impacted residents and roads in South Knighton along its course.</p> <p>The area around the site is a known traffic hot spot with large traffic jams a daily occurrence, complicated further by the location of the Racecourse, the Shell Petrol Station, and the Nursery on the corner of the London Road and Shanklin Drive. The Racecourse is now increasing the number of events that it holds including concerts and weddings. This is known to increase the noise levels, parking congestion in the surrounding areas and the frequency of littering.</p> <p>Given the location of the land and the distance from the main population of Oadby and Wigston, the site will require people to use their cars to get there, adding to the pollution and congestion issues already experienced in this area. If the carpark is full, where do the other visitors park? In addition to this, any development will require access, and this will again add to the already significant levels of congestion and parking issues, requiring multiple new sets of traffic lights and changes to road layouts.</p> <p>The main concern is a serious one, and with five million homeowners or 1 in 6 properties in the UK now at the risk of flooding, it is one that any Developer / Development / Local Planning Team needs to consider, to ensure that no risk and subsequent clean-up cost is passed onto the residents. Given the <i>Institutional or similar style use</i> classification, it would be quite logical to assume that the development will be a building of significant scale and size, requiring acres of parking space. The development and car park combined will have a significant concrete footprint. It is known that this can then increase flooding risk as water is not drained off into the ground. With the existing risk of flooding from the brook, adding to this risk could have serious consequences for the residents in South Knighton.</p>	

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		I would implore you to give your serious thoughts and consideration to the above.	
Local Resident, 15 th May 2024	OAD/006	<p>Land at Oadby Grange</p> <p>Objection</p> <p>The site OAD 006 looks as if it is the site that was the subject of a planning proposal that was rejected on the grounds that it was contrary to the existing local plan, and therefore hostile. It should therefore not be put into the new local plan as there is clear local opposition to it.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 21st May 2024	OAD/006	<p>Land at Oadby Grange</p> <p>Objection</p> <p>I lives in oadby windrush drive door number 92 last week I received the letter From you guys your have a plan to make something in ur back garden when searched in google I didn't find any information what you will make there because actually it's too much effecting ur live there's very nice special in the morning the birds singing and the people is going for walks it's really nice it's like park also manner high school kids going for walk because there football field near there please don't make anything else except park and play area for kids also ur garden will be very dark if there's build houses no I asked my neighbours they also not happy we all suggest if there will be park and play grounds kids it will be nice thanks</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 10 th	OAD/006	<p>Land at Oadby Grange</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its</p>

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
May 2024		<p>Objection</p> <p>My goodness what a shock and surprise Oadby wanting to build 600 new houses at the back of Manor Road Extension Copse Close and Manor School.</p> <p>We haven't got enough facilities for the homes already have, not enough doctors schools police to sort the burglaries out, or Roads wide enough for all the traffic, with every junction a nightmare at rush hours.</p> <p>Please get this sorted before taking our little list of green space, where people get enjoyment to walk play and relax.</p> <p>Up to Gartree Road which is now getting very very busy since the new buildings at traffic coming from Great Glen as well. Please consider the housing plas are not viable until other things are sorted first.</p>	<p>decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 15 th May 2024	OAD/006	<p>Land at Oadby Grange</p> <p>Objection</p> <p>I strongly object to the proposal of building residential dwelling on this greenfield land at Oadby Grange off Florence Wragg way/Bluebell Close. This will lead to loss of greenbelt land, woodland and wildlife and the loss of drainage land has the potential to increase the risk of flooding to the area. Other concerns for the local area are increase in traffic, pollution and noise, and increased demand on already stretched services such as GP surgeries and schools.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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Local Resident, 15 th May 2024	OAD/006	<p>Land at Oadby Grange</p> <p>Objection</p> <p>Re: Page 150-151 Land at Oadby Grange - proposal to build residential dwellings</p> <p>I strongly object to the proposal of building residential dwelling on this greenfield land at Oadby Grange off Florence Wragg way/Bluebell Close. This will lead to loss of greenbelt land, woodland and wildlife and the loss of drainage land has the potential to increase the risk of flooding to the area. Other concerns for the local area are increase in traffic, pollution and noise, and increased demand on already stretched services such as GP surgeries and schools.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 15 th May 2024	OAD/007	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>I object to the proposed development of the land south of Sutton Close, Tilton Drive and the Oadby schools (Brocks Hill Primary School, Gartree High School & Beauchamp College) with regards to a number of issues detailed below</p> <ol style="list-style-type: none"> 1. The land, with current use as farm land for the production of crops, makes up part of the Green Wedge (Council policy 33) which seeks to ensure that there is wedge of green land between Oadby and Wigston to act as a Green Lung of the Borough. The council policy states that development should radiate from the centres of Oadby and Wigston thus maintaining a green wedge with all the associated 	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>benefits for residents and wildlife that live in these areas.</p> <p>2. This farm land currently supports a wide variety of wildlife which contributes to the valuable biodiversity of the Borough with the associated benefits. This is what the Borough's green wedge policy is for, it allows for the free movement of wildlife between existing sites of high biodiversity such as the country parks and the wider surrounding greenbelt. The value of this green space to the residents who live on its perimeter was particularly noted during the pandemic as it allowed residents access to green spaces which dramatically promoted their physical and mental health and wellbeing. This is something that the Council has an obligation to actively achieve through its planning. Should this green wedge be lost to housing development the detrimental impact to the biodiversity may be hugely significant and irreversible together with a negative impact to the Borough's plan to reduce climate change.</p> <p>3. Access to the site would only be practicable via the existing Cottage Farm development as the current roads of Brair Walk, Briar Meads and Sutton Close are overwhelmed and totally unsuitable to larger vehicles and additional traffic such as buses and delivery vehicles which this development of up to 170 dwellings would undoubtedly bring. The suggestion that access to the development via either Sutton Close or Tilton Drive is wholly impracticable as these roads are too narrow to convey the type and volume</p>	

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
		<p>of traffic needed. Also Briar Walk & Briar Meads that feed Sutton Close and Tilton Drive are already at breaking capacity at school drop off and collection times with vehicles parking half on pavements on both sides of the road making entrance and egress of the area at these times very dangerous and at sometimes temporarily impossible. If the proposed development was to be accessed in this way it would only compound the problem as well as the development would not be accessible for a bus route as the existing roads are totally unsuitable as they are too narrow for 2 such vehicles to pass one another.</p> <p>4. The proposed site would also completely surround the 3 previously mention schools preventing them for any future expansion of their existing footprint. This would mean that there would be a higher demand on these schools, resulting in the potential of an increase in the size of role requiring additional building on current playing fields.</p>	
Local Resident, 15 th May 2024	OAD/007	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>I object to the proposed development of the land south of Sutton Close, Tilton Drive and the Oadby schools (Brocks Hill Primary School, Gartree High School & Beauchamp College) on a number of grounds detailed below.</p> <p>1. The land, with current use as farm land for the production of crops, makes up part of the Green Wedge (Council policy 33) which seeks to ensure that there is wedge of green land between Oadby and</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>Wigston to act as a Green Lung of the Borough. It would be detrimental to the Borough and its residents if this Green Wedge is developed for housing and there was unbroken development between the A50 in Wigston and A6 at Cottage farm.</p> <p>2. This farm land currently supports a wide variety of wildlife which is an extremely valuable resource and contributes considerably to the biodiversity of the whole Borough. This is a prime example of the Borough green wedge policy in action as it benefits the wildlife in establishing corridors for free movement between existing sites of high biodiversity such as Brocks Hill Park. The value of this green space to the residents who live on its perimeter is difficult to quantify but it has been shown that it dramatically promotes both physical and mental health and wellbeing, which again the Council has a duty to consider and achieve through its planning. Should this green wedge be lost to housing development the detrimental impact to the biodiversity may be hugely significant and irreversible.</p> <p>3. Access to the site would only be practicable via the existing Cottage Farm development since that infrastructure currently exists and can take the volume of traffic including both residents and service vehicles (buses, waste collection, delivery trucks) efficiently and safely to and from major routes via the A6. The suggestion which has been rumoured that access to the development via either Sutton Close or Tilton Drive is wholly impracticable as these roads are too</p>	

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		<p>narrow to convey the type and volume of traffic needed. Also Briar Walk & Briar Meads that feed Sutton Close and Tilton Drive are already at breaking capacity at school drop off and collection times with vehicles parking half on pavements on both sides of the road making entrance and egress of the area at these times very dangerous and at sometimes temporarily impossible. If the proposed development was to be accessed in this way it would only compound the problem as well as the development would not be accessible for a bus route as the existing roads are totally unsuitable as they are too narrow for 2 such vehicles to pass one another.</p> <p>4. The proposed site would also completely surround the 3 previously mention schools preventing them for any future expansion of their existing footprint. This would mean that there would be a higher demand on these schools, resulting in the potential of an increase in the size of role requiring additional building on current playing fields.</p>	
Local Resident, 13 th May 2024	OAD/007	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>There are 500+ housing already being built on Cottage Farm Phase 1 & 2.</p> <p>Schools, Doctors, Dentists, Sewage & Water and transport are not adequate at the moment for existing houses so will not cope with more houses.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>This Green Wedge is important for the environment, wildlife as well as peoples wellbeing and it is not good to join urban environments together.</p> <p>There would definitely be problems with access via Sutton Close as the road is not wide enough for Construction Lorries and it would not be safe for the children living in the close.</p> <p>My house is on the boundary of the Green Wedge and it is important to let you know that the land of the Green Wedge is about 3ft lower than my garden.</p> <p>Hopefully my objections will also be raised by other people and will be taken into account.</p>	
<p>Local Resident, 14th May 2024</p>	<p>OAD/007</p>	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>I am strongly objecting to the preferred development option indicated above.</p> <p>Being a resident of Oadby for over 24years, I have enjoyed its scenic greenfield areas for maintaining great mental health and enjoying its abundance of wildlife.</p> <p>I understand housing is needed but to build on a Green wedge is going against everything why these areas were introduced allowing clean air through the borough and combatting pollution.</p> <p>It has always been OWBC policy to promote green spaces until recently where greater consideration should be given to such areas.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>This site is surrounded by hedges and wildlife and has no highway access so the routing of a new road through the already narrow residential roads is just not viable.</p> <p>With the development of Cottage Farm well under way, the infrastructure will struggle to cope with the growing population of the area.</p> <p>Hope these points are considered and the local residents can continue to enjoy the green spaces offered in the area.</p>	
<p>Local Resident, email on 13th May 2024 and then letter on 29th May 2024</p>	<p>OAD/007</p>	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>This area needs to be continued to be designated as Green wedge as per the council policy 33 for well being of local resident and the wild life. Any development will have serious detrimental impact on local community including on mental health and physical wellbeing.</p> <p>Further objection received: Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>I am objecting to the proposed planning for the following reasons.</p> <p>1. Any development of housing in the area will have enormous damage to the current green belt / green wedge which is currently being designated. This will also go against the current Council policy to protect and promote green field / green wedges for local community wellbeing and to reduce green house gases. This is also an area for local community</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>wellbeing current one for walk and relaxation. Development will add stress and will impact community welfare.</p> <p>2. Any new development will have major impact on the local infrastructure, which is already under huge constrain. The local community will be impacts from traffic and crippling infrastructure, more pressure on school and health facilities.</p> <p>3. this goes against the OW Council own policy to protect and preserve the green wedge area. The Council need to protect this area and continue to designate this area as green wedge till 2040. The community needs it for wellbeing.</p>	
<p>Local Resident, 6th May 2024</p>	<p>OAD/007</p>	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>We are submitting this form to object to the current site submission for site “OAD/007”, we would like to object on the following grounds:</p> <p>Policy 33 by the council does not allow permission to build residence on the green wedge. Building residential estate on this site is going against this council’s policy. Site OAD/007 is the green wedge land behind Sutton Close and Tilton Drive that separates the Oadby and Wigston settlement; hence, there should be no residential development on this land. All the Oadby development plans proposed for the future, should not be allowed and should go out of Oadby and should be developed in the countryside. Furthermore, building on green wedge linked to the country parks – Site OAD/007, which sustain biodiversity and a healthy lifestyle for all the species in it. It is a corridor for wildlife linked to the environment park. It is It also reduced the impact of climate change. It is very</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>important that this land is not used for residential development.</p> <p>Our next concern is that the inadequate road access. The road on Sutton Close is 4.5 meter in width, which can barely have two cars get through it at the best of the times. Also, destroying a house on Sutton Close to build a through way on a narrow busy road is unethical and will cause many traffic and accident issues in the residence. These roads get extremely congested during school times. This issue remains in all of the road network in the area. Briar meads and all the roads leading off this. We as residents of these roads will be directly affected as we stay on the close, but as there is no direct access to the estate to A6 (other than going through cottage farm or Briar mead and then Ash tree or Rosemead Drive) this means Briar Meads, Ash Tree Road, Rosemead Drive and Oadby-Wigston road as well as the cottage farm residents will be affected. Lots of sites suggested by landowners for development suggests a loop from cottage farm development to A50 in Wigston, all going through narrow residential, already congested streets rather than direct access of A6. This should not be permitted. Everyone who lives off these roads will be affected. Not just at peak times but traffic pollution will always affect everyone. New development will further congest narrow and busy road network in the area. This will cause residents unduly stress.</p> <p>We would like to express our concerns about overcrowded school. Schools are already adding an additional class group to each year starting with foundation as a result such as Brocks Hill Primary school is physically expanding. . This is due to cottage farm and grange farm developments and intake of learners from these new developments. If the residential estate get built in the green wedge, OAD/007 the</p>	

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		<p>schools in the area will get boxed in and will have no physical space to expand. This will result in overcrowded school with no space for learners to move. Densely populating this region further, causes further overcrowding in schools which are already oversubscribed or full to their capacity. It also puts more pressure on school due to increase in intake of learners. This could also be the case for doctors' surgeries too.</p> <p>Moreover, due the slope of the land the foul drainage will have to be pumped uphill. This would be highly uneconomical project to undertake.</p> <p>Countryside residential development rather than using green wedge in congested areas will be better.</p> <p>Thank you for taking the time is considering are objection to the recent call for sites proposal.</p>	
Local Resident, 10 th may 2024	OAD/007	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>We object to the proposal for the site south of Sutton Close to be allowed to have dwellings be built as Sutton Close is too narrow for it to be used to access the proposed land. Along with this, Briarmeads and the surrounding roads are already very congested and difficult to access especially at school drop off and collection times. Even without this proposed development I would be very concerned if emergency services needed to get close to any homes near the schools or even the schools themselves and any development of the land will only add to this congestion.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>In addition to the above, we are surprised to hear that Oadby & Wigston Council would allow development of this land and go against their own Green Wedge policy. O&W council should make sure developments go into the countryside rather than utilising this green wedge land.</p>	
<p>Local Resident, 6th May 2024</p>	<p>OAD/007</p>	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>This development would add severe congestion around the surrounding residential roads, e.g. Tilton Drive, Sutton Close, etc. It would disrupt the peaceful area currently around these roads and streets, add more noise and pollution, cause more chaos and congestion.</p> <p>The current infrastructure, just about copes with the present population. Most residents cannot get a doctor's appointment, find difficulty parking especially during school drop off & pick up times, and during school events like parents evenings, open days, & other events.</p> <p>My objection to this development is based on the reality of problems up ahead if this development is allowed to progress any further.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
<p>Local Resident, 6th May 2024</p>	<p>OAD/007</p>	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>I strongly object against the development of a new residential dwelling site to happen behind Sutton Close. We as the community of people living on the road & nearby all have made a general consensus to object due to the following reasons:</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification</p>

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		<ol style="list-style-type: none"> 1) OVERCROWDING 2) SUTTON CLOSE IS ALREADY VERY NARROW 3) OVERFLOW INTO SCHOOLS 4) IT GOES AGAINST PROTECTING GREEN WEDGE & NOTABLY POLICY 333 5) BUILD ON IT, WILL SEVERLEY IMPACT WILDLIFE 6) DRAINAGE ISSUES <p>Sutton Close is already over-crowded. We see a lot of cars parking due to school traffic. Building a road through 8 Sutton Close, will cause hell. Please do the right thing and do not let it proceed!</p>	<p>for its approach. In addition, the Council will publish background evidence to underpin its approach..</p>
<p>Local Resident, 10th May 2024</p>	<p>OAD/007</p>	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>I object to this site being designated for Residential use as this site forms an intrinsic part of the Green Wedge separating Oadby from Wigston and which was enhanced at the last Local Plan review.</p> <p>Additionally, the access to the site would need to be via the existing infrastructure which is not designed for additional development. There is difficulty already in using the existing roads in this vicinity, particularly at peak school times.</p> <p>The land slopes to the south meaning that any foul drainage would have to be pumped which would render the site development uneconomic.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach..</p>
<p>Local Resident, 6th</p>	<p>OAD/007</p>	<p>Land South of Sutton Close, Oadby</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its</p>

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May 2024		<p>Objection</p> <p>Policy 33 by the council does not allow permission to build residence on the green wedge. Building residential estate on this site is going against this council's policy. Site OAD/007 is the green wedge land behind Sutton Close and Tilton Drive that separates the Oadby and Wigston settlement; hence, there should be no residential development on this land. All the Oadby development plans proposed for the future, should not be allowed and should go out of Oadby and should be developed in the countryside. Furthermore, building on green wedge linked to the country parks – Site OAD/007, which sustain biodiversity and a healthy lifestyle for all the species in it. It is a corridor for wildlife linked to the environment park. It is It also reduced the impact of climate change. It is very important that this land is not used for residential development.</p> <p>My next concern is that the inadequate road access. The road on Sutton Close is 4.5 meter in width, which can barely have two cars get through it at the best of the times. Also, destroying a house on Sutton Close to build a through way on a narrow busy road is unethical and will cause many traffic and accident issues in the residence. These roads get extremely congested during school times. This issue remains in all of the road network in the area. Briar meads and all the roads leading off this. We as residents of these roads will be directly affected as we stay on the close, but as there is no direct access to the estate to A6 (other than going through cottage farm or Briar mead and then Ash tree or Rosemead Drive) this means Briar Meads, Ash Tree Road, Rosemead Drive and Oadby-Wigston road as well as the cottage farm residents will be affected. Lots of sites suggested by landowners for development suggests a loop from cottage</p>	<p>decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p> <p>.</p>

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		<p>farm development to A50 in Wigston, all going through narrow residential, already congested streets rather than direct access of A6. This should not be permitted. Everyone who lives off these roads will be affected. Not just at peak times but traffic pollution will always affect everyone. New development will further congest narrow and busy road network in the area. This will cause residents unduly stress.</p> <p>I would like to express our concerns about overcrowded school. Schools are already adding an additional class group to each year starting with foundation as a result such as Brocks Hill Primary school is physically expanding. . This is due to cottage farm and grange farm developments and intake of learners from these new developments. If the residential estate get built in the green wedge, OAD/007 the schools in the area will get boxed in and will have no physical space to expand. This will result in overcrowded school with no space for learners to move. Densely populating this region further, causes further overcrowding in schools which are already oversubscribed or full to their capacity. It also puts more pressure on school due to increase in intake of learners. This could also be the case for doctors' surgeries too.</p> <p>Moreover, due the slope of the land the foul drainage will have to be pumped uphill. This would be highly uneconomical project to undertake.</p> <p>Countryside residential development rather than using green wedge in congested areas will be better.</p> <p>Thank you for taking the time in considering my objection to the recent call for sites proposal.</p>	
Local	OAD/007	Land South of Sutton Close, Oadby	The Council has undertaken considerable work to

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Resident, 11 th May 2024		<p>Objection</p> <p>I am writing to express my strongest objection to the proposed housing development planned for the area behind Sutton Close, designated as Site OAD007. This development poses a significant threat to the well-being of residents, the local wildlife, and the delicate biodiversity of the area.</p> <p>Unacceptable Impact on Residents:</p> <p>Strained Infrastructure: The current infrastructure in Sutton Close is already stretched thin. The influx of new residents will inevitably overload our existing roads, parking facilities, and essential services like waste collection and sewage systems. This will result in traffic congestion, parking nightmares, and potential service disruptions, significantly impacting the quality of life for all residents.</p> <ul style="list-style-type: none"> • Loss of Peace and Tranquility: The proposed development will destroy the current sense of peace and tranquility enjoyed by residents of Sutton Close. The increased noise and activity from construction and new residents will disrupt the serenity of the neighborhood <p>Devastating Consequences for Wildlife and Biodiversity</p> <ul style="list-style-type: none"> • Habitat Destruction: The development will undoubtedly lead to the destruction of vital wildlife habitat. This will displace numerous animal species, potentially forcing them into already stressed ecosystems or endangering them altogether • Loss of Biodiversity: The area behind Sutton Close likely boasts a rich tapestry of plant and animal life. 	<p>inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>This development will disrupt this delicate balance, leading to a loss of biodiversity and a negative impact on the overall health of the local environment.</p> <p>Demand for a Comprehensive Plan:</p> <p>This project, in its current form, prioritizes profit over the well-being of the community and the environment. We, the residents of Sutton Close, demand a comprehensive plan that addresses the concerns outlined above. This includes:</p> <ul style="list-style-type: none"> • Infrastructure Upgrade: A thorough assessment of the existing infrastructure and a concrete plan for its upgrade to accommodate the increased demand from the new development. • Reduced Density: Exploring alternative development plans with a reduced housing density to minimize the impact on residents and the environment. • Environmental Impact Assessment: A comprehensive and independent environmental impact assessment to understand and mitigate the potential damage to wildlife and biodiversity. <p>We urge you to reconsider this proposal and prioritize the well-being of the community and the environment. We are prepared to take further action to ensure our voices are heard.</p>	
Local Resident, 21 st April	OAD/007	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>These are our OBJECTIONS regarding land to the south of Sutton Close / Tilton Drive, Oadby, being earmarked for building:</p>	The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.

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		<p>1. This is high yield farm land which needs to be retained and protected for future generations. Within our borough, vast areas of valuable agricultural land have already been lost to residential development.</p> <p>2. The wooded area / spinney to the south of Sutton Close provides essential habitats for animals, birds and amphibians and must therefore be left undisturbed.</p> <p>3. The green wedge provides a natural boundary between the towns of Oadby and Wigston, allowing residents from both locations access to open countryside for their health and well being.</p> <p>4. There is no vehicular access to this land, from either Sutton Close or Tilton Drive. This would require demolition of residential properties.</p>	<p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
<p>Local Resident, 6th May 2024</p>	<p>OAD/007</p>	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>I strongly object to this development, since it would cause logistical & environmental problems throughout the residential roads : Tilton Road, Sutton Close, Briar Meads.</p> <p>I walk to school, and it's congested especially during start & finish times. I'm having to walk around numerous parked cars, frequently I have to walk on the road to avoid other pedestrians & adding more houses will only add to the pressure, resulting in an accident, potentially fatal.</p> <p>I enjoy the natural beauty at the rear of houses, looking out to green fields is a treasure to protect, & not to sell it off to the</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		highest bidder. We need to look after our ecological environment for us young people, protect the varied wildlife that inhabit the green fields & keep it away from being built upon	
Local Resident, 4 th May 2024	OAD/007	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>I am objecting to site option OAD/007, Land South of Sutton Close, Oadby as identified in the Oadby and Wigston Borough Council (OWBC) document; New Local Plan (2020 – 2041), Regulation 18B Preferred Options, Consultation Draft, Spring 2024</p> <p>OWBC - Policy 10: Housing Density The proposed 50 - 170 homes would not meet the OWBCs effective and efficient housing density policy of between 40 and 50 homes per hectare. In order to meet this policy, the proposed development would need to be closer to 360 homes at minimum, which would exacerbate all concerns raised in this document.</p> <p>OWBC - Policy 5: Climate Change This policy has a conservation objective stating “Green infrastructure, including trees, woodland and hedgerows will have a major role to play in this, helping to mitigate the impacts of high temperatures, reduce flood risk, and maintain / restore biodiversity”. This development proposal would seem to disregard this policy commitment, especially at a time where the climate is front and centre of public attention.</p> <p>OWBC - Policy 31: Protecting Biodiversity and Geodiversity This land supports a wide range of wildlife and forms an</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>important wildlife corridor between the adjacent fields including Coombe Park and the larger Brocks Hill Country Park. The water course on the southern boundary is also likely to support much of the wildlife, which would be impacted with the proposed development.</p> <p>OWBC - Policy 32: Local Green Space Apart from being agricultural land, its access to adjacent fields provides many walkers and families with opportunities to explore the countryside. The ease of access and popularity helps many residents maintain healthy lifestyles and improve their mental health. Whilst providing a beautiful view and rural feel, it is also very popular with local wildlife and is frequently visited by a wide range of birds and other wildlife.</p> <p>OWBC - Policy 33: Green Wedges With the ever increasing demand for homes, the importance of maintaining Green Wedge spaces also increases. These “Green Lungs” as described in the OWBC policy are also designed to prevent the merging of new and existing housing developments, this proposal would therefore seemingly contravene the OWBC policy.</p> <p>Highways The previous attempt to redevelop the land was rejected by OWBC back in April 2018 citing “no potential for highway access onto roads classified as A or B roads.” and “The highway layout of the existing residential estate would not be appropriate for enabling access to large scale growth”. Both of these concerns still stand, with Sutton Close and roads leading out of the estate already being unsuitable for the volumes of traffic at peak times.</p> <p>It should also be noted that Brocks Hill Primary School is in</p>	

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		<p>consultation, due to increased demand from new developments, for adding an additional class of 30 children to each of the 7 years. This would result in an additional 200+ children attending the school, and bring with it further demand on the highways in the surrounding area.</p> <p>Schooling As mentioned, Brockhill Primary School is looking to expand its intake of children, and will ultimately lead to Gartree High School and Beauchamp College also increasing their intake. The proposed development would inhibit the schools ability to expand outside of its current boundaries since this new proposed development would merge existing and planned estates together, boxing the schools in forever.</p>	
Local Resident, 12 th May 2024	OAD/007	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>I wish to object to the planned development to the land south of Sutton Close Oadby. Not only is the proposed for a through road illogical, it will make the current traffic problems during school terms insurmountable. What is currently a close will become a rat run for dropping off children before parking in the area, making traffic situation impossible.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 12 th May 2024	OAD/007	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>I want to enter my objection in relation to site option OAD/007, Land South of Sutton Close, Oadby as identified in the Oadby and Wigston Borough Council (OWBC) document; New Local Plan (2020 – 2041), Regulation 18B Preferred Options, Consultation Draft, Spring 2024. There should be no</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-</p>

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		<p>residential buildings on this GREEN WEDGE.</p> <p>Firstly, I refer to OWBC - Policy 10: Housing Density. This proposed 50 - 170 homes would NOT meet the OWBCs housing density policy of between 40 and 50 homes per hectare. In order to meet this policy, the proposed development would need to be closer to 360 homes at minimum, which would exacerbate all concerns raised in this document. We should be protecting what wildlife and natural habitat we have left as most of it is on the decline.</p> <p>Secondly, I refer to OWBC - Policy 33: Green Wedges. It is very important to maintain Green Wedges space in the face of ever-increasing housing demands. These “Green Lungs” as described in the OWBC policy are also designed to prevent the merging of new and existing housing developments, this proposal would therefore seemingly contravene the OWBC policy.</p> <p>Thirdly I refer to the subject of Roads and Other Infrastructure - The previous attempt to redevelop the land was rejected by OWBC in April 2018 citing “no potential for highway access onto roads classified as A or B roads.” and “The highway layout of the existing residential estate would not be appropriate for enabling access to large scale growth”. Both of these concerns still stand, with Sutton Close and roads leading out of the estate already being utterly unsuitable for the volumes of traffic at peak times. It should also be noted that Brocks Hill Primary School is in consultation, due to increased demand from new developments, for adding an additional class of 30 children to each of the 7 years. This would result in an additional 200+ children attending the school, and bring with it further demand on the highways in the surrounding area. It’s shocking that you want to keep</p>	<p>Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>allowing these homes, but you don't think about the infrastructure at all. You should first build all infrastructures like schools and surgeries and proper roadworks etc.</p>	
<p>Local Resident, 13th May 2024</p>	<p>OAD/007</p>	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>These comments are regarding Site Reference OAD/007 - Greenfield Land - South of Sutton Close, Oadby.</p> <p>My Key objections are:</p> <p>It is important to keep this site as a Green Wedge to support residence health by limiting pollution affecting their health, keeping the natural environment and stopping developments affecting the wonderful wildlife in this area.</p> <p>The Green Wedge also plays a part in stopping Oadby and Wigston being joined together by potential housing developments. It has footpaths and bridleways that provide public access.</p> <p>Planning permission has been given already for 500+ new homes on Cottage Farm Development Phase 1 & 2. This increase in housing is already affecting the local infrastructure ie transport systems, water & sewage systems, the schools and doctors. These services would not cope with any additional Housing Developments gaining permission to build.</p> <p>I understand that the proposed access to this site would be via Sutton Close, in my opinion Sutton Close is not wide enough to take additional cars and lorry's. I am very</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>concerned about the problems we would have to access our homes.</p> <p>There are a number of families that live on Sutton close who have children that play safely in Sutton Close, this development if agreed would affect that.</p> <p>Finally, I have lived here nearly forty years and paid a premium price for my home for the benefits of access to the countryside and outstanding views and I feel the value of my property would go down if this was allowed to go ahead.</p>	
Local Resident, 14 th May 2024	OAD/007	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>I object to the new housing development in this area for several reasons, here are my main objections.</p> <ol style="list-style-type: none"> 1. This will increase the traffic flow near Brocks hill school which is already terrible. I have witnessed several people at their final tether whilst trying to drive through the build up at school starting and finishing times. Each time being over an hour of terrible parking, near accidents and some road rage. Many parents don't park correctly and block the road, it takes a long time and a lot of patience to get through this area. With increase of traffic there will be an accident. 2. This is a lovely green area which include a woodland area full of wildlife. There are woodpeckers and several other types of wildlife which can be seen or heard on a trip down to this area. There is a small brook that runs through the area which encourages 	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>wildlife and is a lovely area for walkers to go and people do go their often, I am one of them. I do not want to walk through houses that is not pleasant. There is no other woodland type area in walking distance from my house.</p> <ol style="list-style-type: none"> <li data-bbox="629 443 1379 687">3. We have already had wild areas and calm destroyed by a housing development very close next to Coombe Park. This has caused those lovely little birds that used to next in the field (sorry don't know their type) to lose their habitat, it has also increased traffic and business to the area. I feel like this is enough new development for this area to have to cope with now. <li data-bbox="629 695 1379 863">4. The cul-de-sac leading on to the area is a lovely peaceful area and this have a much heavier traffic load, my neighbours have bought these houses because it is a peaceful quiet area. This impact is unfair. <li data-bbox="629 871 1379 1158">5. People going to Brocks Hill Park/ environmental centre go for the large open space and often extend their walks onto these fields down the footpaths. This is good for relaxation which many people need more than ever. It will spoil these long walks for many. The hiking and walking clubs in this area often use these walks and would be very upset with taking away this countryside. <li data-bbox="629 1166 1379 1374">6. The schools would have houses at the back of them rather than the open spaces good for the students. Many young people have asthma now which is exasperated by traffic. Do we want more build up near the schools which a large number of children are attending? NO. 	

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Local Resident, 13 th May 2024	OAD/007	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>Re estate planning on land behind Sutton Close and Tilton Drive. This land is a green wedge that separates Oadby and Wigston Building houses here is against council policy and should not be permitted.</p> <p>Difficulties using narrow roads. Sutton Close is very narrow and is already overrun by school traffic and horrendous parking and with the proposed extension to Brocks Hill School this will lead to very congested roads. Increase in school capacity will cause problems for residents of Sutton Close</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 13 th May 2024	OAD/007	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>I am objecting to Appendix 1 site options OAD/007 as I do not feel that it is good for the community to have houses built in the green wedge. This should be preserved. Additionally, I do not feel that there is adequate road access in this area. At present, during school drop-off and pick-up times, there is already too much traffic in the area. Building more houses will make the traffic situation worse.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 6 th May 2024	OAD/007	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>I strongly oppose this development as the area surrounding does not have the infrastructure that will support this</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been</p>

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		<p>development.</p> <p>As it is the roads – Briar meads, Howden road, Ash Tree road & Rosemead roads are always really congested around school drop off/ pick up times. The Development OAD 008 has already happened, and we can see there are no additional accesses to schools, leaving Ash tree road congested during School pick up and Drop off times Also not to mention Health services are super stretched we are not being able to get a Doctor’s appointment now, what will happen with all these new additional housing? We also do not have any recreational facilities for Kids. Instead of adding these facilities , we are actually adding more houses!</p> <p>The Council need to think about Expanding Roads, Having Paths leading to schools from the new developments, Having additional Doctor’s surgeries and Infrastructure to support all these additional housing. Recreational Facilities for kids.</p>	<p>considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
<p>Local Resident, 14th May 2024</p>	<p>OAD/007</p>	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>1) This is going against the council policy 33 as it will reduce the green wedge between Oadby and Wigston.</p> <p>2) Sutton close is too narrow to accommodate a through road to the proposed development.</p> <p>3) The increase in traffic will have an adverse impact on Sutton Close and the surrounding area. This is particularly relevant at school pick up/drop off time. It is already hazardous and chaotic</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>4) The value of our property will decrease by having a new estate built nearby and having a through road from Sutton Close.</p> <p>5) It will have impact on wildlife and biodiversity by building on green wedge and going against policy 33.</p> <p>6) It will have impact on health and wellbeing as it will be taking away green area. Increase in traffic will lead to more noise and pollution.</p>	
Local Resident, 13 th May 2024	OAD/007	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>I object for the following reasons...</p> <p>The transport links for the new estate are already struggling with the school traffic. Because of the no parking zones in front of the three schools, parents park all along Briar Meads and at times Sutton Close. This means it is very difficult navigating the road and at times , comes to a standstill. Also further down Briar Meads at the junction of Ash Tree Rd and the junction at Rosemead become significantly congested. It means getting out of this part of Oadby challenging. It also means that as people are in a rush and trying to navigate difficult roads, it becomes dangerous for pedestrians, especially those with pushchairs and wheelchairs who at times, have to go on the road due to parked cars covering the pavements. This is also dangerous for young children walking. This is a problem that will be compounded by the fact that Brocks Hill is due to increase the school size creating an even bigger problem. If the new estate is built,</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>this will significantly add to the problem.</p> <p>The road entering Sutton Close is a lot narrower than the average road and it can be challenging driving past another vehicle at the same time. If two vans were to pass, it may not be wide enough. With the possibility of upwards of 170 houses, the risk of cars passing in this area is greater and could further add to congestion. This would also be a problem with access for large vehicles being used for the building work.</p> <p>From what I understand, foul drainage would need to be pumped up hill which is a very uneconomical option and therefore not very environmentally friendly.</p> <p>Another issue is that by building this development, the potential expansion of Brocks Hill, Gartree and Beauchamp wouldn't be possible. The land as it stands is vacant but building an estate here would mean the schools capacity is limited. The schools are already oversubscribed and removing the option of expansion is a big mistake.</p> <p>Further comment received by same resident:</p> <p>With urbanisation growing, the effect on our environment is greater than ever. It is clear that housing is needed for our growing population but this should be balanced with the effect it would have on the local wildlife. We are located right next to Brock Hill Country Park and the location of the proposed development site is home to significant wildlife. With the proposed plans, the habitats of many animals could be disrupted or even destroyed. This would come at the detriment of the local wildlife and the local ecosystem. It is quite possible that the disruption and closeness to Brocks Hill</p>	

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		<p>Country Park could scare off local wildlife.</p> <p>Policy 33 outlines the requirement to keep settlements separate. The proposed plans would be reducing this green wedge reducing the distance between Oadby and Wigston. This would remove once again wildlife and green spaces. It would also reduce the amount of absorbant ground increasing the risk of flooding. With other proposed plans, the gap between the two towns could be completely removed.</p> <p>With climate change being hot on the counties agenda, the proposed site would be adding to this and removing quality green space. This would further add to the towns carbon footprint.</p>	
<p>Local Resident, 10th May 2024</p>	<p>OAD/007</p>	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>I am objecting to site option OAD/007, Land South of Sutton Close, Oadby as identified in the Oadby and Wigston Borough Council (OWBC) document; New Local Plan (2020 – 2041), Regulation 18B Preferred Options, Consultation Draft, Spring 2024. An ill-considered plan to get rid of our beautiful countryside and cover it in bricks and concrete. There should be no residential buildings on this GREEN WEDGE.</p> <p>I would draw your attention to OWBC - Policy 10: Housing Density. This proposed 50 - 170 homes would NOT meet the OWBCs housing density policy of between 40 and 50 homes per hectare. In order to meet this policy, the proposed development would need to be closer to 360 homes at minimum, which would exacerbate all concerns raised in this</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>document.</p> <p>We should be protecting what wildlife and natural habitat we have left as most of it is on the decline. It's a shame you have earmarked this Oadby farmland where I know a lot of people go walking and/or take their dogs for a walk every day along the paths on the edges of the farmland.</p> <p>Roads and Other Infrastructure - The previous attempt to redevelop the land was rejected by OWBC in April 2018 citing "no potential for highway access onto roads classified as A or B roads." and "The highway layout of the existing residential estate would not be appropriate for enabling access to large scale growth". Both of these concerns still stand, with Sutton Close and roads leading out of the estate already being utterly unsuitable for the volumes of traffic at peak times. It should also be noted that Brocks Hill Primary School is in consultation, due to increased demand from new developments, for adding an additional class of 30 children to each of the 7 years. This would result in an additional 200+ children attending the school, and bring with it further demand on the highways in the surrounding area.</p> <p>It's shocking that you want to keep allowing these homes, but you don't think about the infrastructure at all. Where are the infrastructure plans for this proposed development. You should first build all infrastructures like schools and surgeries and proper roadworks etc. Where are all the children that live on the "new Meadows" going to go to school?. The existing schools and doctors surgeries are already full to capacity.</p> <p>Leicester City Centre has plenty of empty spaces with empty buildings effectively 'doing nothing' and yet, they want to bleed into Oadby Wigstons footprint. Why can't Leicester build on their empty spaces as there are so many abandoned</p>	

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		factories which could be developed into Apartments. It needs to renovate the brownfield sites. The City should take a leaf from Manchester, Sheffield and Leeds and build their own houses.	
Local Resident, 14 th May 2024	OAD/007	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>I wish to object to the planned Sutton Close option regarding the development of the land South of Sutton Close and Tilton Drive. The proposal to use Sutton Close as an access point to the new housing area is illogical, and impractical. Sutton Close is precisely that, a Close, which is a reason that we purchased our house over forty years ago. The proposal would only make further traffic problems in the area, which at school times is a major bugbear in the area. The proposal is untenable, with such a narrow road possibly leading to an area which more traffic from the a6 could be inclined to be used as a "rat run". Has anyone from the Council been to see the mayhem in the area at school times, which would be acerbated by such usage of the roads, along with the Brock's Hill School's increase?</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 15th May 2024	OAD/007	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>I am objecting to site option OAD/007, Land South of Sutton Close as identified in the Oadby and Wigston Borough Council document</p> <p>OWBC – Policy 5: Climate Impact The policy has a conservation objective pertaining to Green</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification</p>

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		<p>infrastructure, including trees, woodlands and mitigating the impacts of high temperatures . This will be impacted and the policy will disregard this policy</p> <p>OWBC – Policy 32: Local Green Space Along with it being a farmland, its access to the fields provide many walkers with opportunities to go for long walk enjoying nature and also for wildlife to flourish</p> <p>Schooling: Brocks Hill School is also looking to expand its intake by 30 children this year. This would eventually mean that Gartree and Beauchamp college will also have to increase their intake to make sure the children around are accommodated. With the proposed expansion of the new houses it would mean that the schools and college have no space to expand their premises and will not help in future when the capacity for the schools intake will have to be increased to meet the demands</p>	<p>for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
<p>Local Resident, 16th May 2024</p>	<p>OAD/007</p>	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>I object to OAD/007.</p> <p>This is because;</p> <ol style="list-style-type: none"> 1) This is against the current council policy 33 that there shouldn't be any development residential property on the green wedge separating Oadby and Wigston. 2) The roads are already narrow and so can be difficult getting in and out both ways if there are car's parked on the street, luckily with it being a close at the moment this is rare. However if there were more cars 	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>needing to go through it would make it very difficult. Especially during peak times and school pick up/drop off times. For example, it is 4.5 meters and not even 5 meters.</p> <p>3) Children in the local area are already struggling to get into the schools closest to us, if that is the case then how will the schools be able to cope with even more children needing to attend? Especially if the building blocks the school in and they have no room for expansion? If they increase the size of the classes would this increase the congestion?</p> <p>4) The waste on the area they are looking to develop would need to be pumped uphill which would mean it is not economical.</p> <p>5) It would create more traffic not just on the current close but also the roads to come out onto the main roads - e.g. briar meads, rosemead, ashtree etc. This is already chaotic and difficult especially with a lot of roads being windy or with speed bumps. The area would become less desirable to live in.</p> <p>6) If the area became less desirable to live in, it could impact the house prices.</p> <p>7) Being in a close increases the house price in itself. By changing this, it impacts every house owner on the close as their house value would depreciate compared to the price they paid for the property which is not great.</p>	

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		<p>8) By taking away the green wedge, it impacts the wildlife and biodiversity in the area - it could also have a negative impact on the mental health of those living in the area as the calm green space that was there is now more built up areas.</p>	
<p>Local Resident, 14th May 2024</p>	<p>OAD/007</p>	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>I object for a through road (access) to be built from Sutton Close for the following reasons:</p> <ul style="list-style-type: none"> • We bought this house due to it being a quiet cul de sac. This proposal will greatly increase the amount of traffic through Sutton Close. • This will have an adverse effect on the value of our property. This will devalue our property and make it difficult to sell in the future. • It will constantly be busy and noisy with additional traffic using Sutton Road as a through road/short cut. This would mean more vehicles are likely to be parked on the street. There is always congestion here due to the schools and colleges and afraid this will become more dangerous for school children, mums walking with pushchairs with small children etc. • Sutton Close is a narrow street and becomes very busy during school times. This will make it more unsafe for all residents, children etc. There is already a lot of traffic here due to the schools and colleges and this will add to the congestion already present on 	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>our street. It will cause additional danger/havoc during school times.</p> <ul style="list-style-type: none"> • This would have an adverse effect on people’s health due to pollution created by extra traffic/vehicles as well as having a negative impact on climate change and carbon footprints. • Additional traffic will compromise the health and wellbeing of residents with pollution. Going out and walking around the green spaces in Oadby is very relaxing and calming which is a big factor to promoting positive mental health, especially with everyone leading stressful lives. 	
Local Resident, 10 th May 2024	OAD/007	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <ol style="list-style-type: none"> 1. At the Public consultation meetings at Beauchamp Academy, the question was asked by my good self if the green wedge between Oadby and Wigston. It was confirmed to the meeting that under the council policy number 33 is that the green wedge would be maintained to give Oadby and Wigston separate identities. That said the majority of land of OAD 007 would fall into this category 2. Access to OAD 007 would be of concern due to the narrow road way of Sutton Close and Tilton Drive. The traffic situation on Briarmeads is already of concern to residence particularly during School term and pick up times. With the additional housing the 	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>situation would get worse and could lead to accidents involving pedestrians and vehicles.</p> <ol style="list-style-type: none"> 3. Existing services would need to be upgraded. The sewer system on the Briarmeads estate has been an issue for sometime and Severn Trent Water are already aware of an issue on Sutton Close that has yet to be sorted. Although gas supplies will not be an issue by the time this 20 year plan has come to an end, Electricity supplies will be an issue. Although there is a sub transformer at the end of Tilton drive a huge upgrade would be needed to supply additional properties. 4. The majority of properties backing onto OAD 007 are slightly above the level of the field concerned will action be taken to prevent any land slippage? 5. Increased rain water running off the land from road ways and storm drains going into the brook adjacent to OAD 007 causing flooding issues with the climate change predicted in the future. 6. The loss of habitat for wildlife with the removal of hedges. 7. Loss of enjoyment of the land for residents of Sutton Close and Tilton Drive and for the wider community who use Brockshill Country Park to gain access to the countryside. 	
Local Resident, 12 th May 2024	OAD/007	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>I object on the grounds that:</p>	The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.

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		<ul style="list-style-type: none"> <li data-bbox="629 261 1379 831">• The Briar Meads estate does not have the necessary capacity to support a new housing development feeding off the existing road network. Local residents are already significantly impacted by parental traffic from the 3 schools on The Ridgeway/Howdon Road. If these schools were being built today, they would never be situated in the middle of residential streets. As a result, it is already difficult for residents to access their homes for an hour at each end of the school day, and there are many near misses as parents and residents try to negotiate through roads narrowed by inconsiderate parking which already reaches as far as Sutton Close. Additional traffic from the new development – which is likely to also peak at these times – would increase the likelihood of gridlock and accidents. <li data-bbox="629 879 1379 1193">• Creating the key route in and out of the development via Sutton Close (and potentially out through Tilton Drive), which is a narrow road without space to widen the roadway, would be a significant mistake. If it was absolutely essential for the development to go ahead, accessing this via Cottage Farm rather than the existing estate would be the logical approach, with pedestrian access instead, particularly into the schools. <li data-bbox="629 1241 1379 1409">• The development is situated on the green wedge, which plays a significant role in supporting biodiversity, ensuring safe open land for wildlife travelling to and from Brocks Hill Park, and reducing the impact of the borough on the climate. The 	<p data-bbox="1406 293 2078 424">The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>council's commitment to the green wedge has been excellent, and I would encourage councillors to continue to support this policy.</p>	
<p>Local Resident, 12th May 2024</p>	<p>OAD/007</p>	<p>Land South of Sutton Close, Oadby</p> <p>Objection</p> <p>I have 3 reasons for objecting:</p> <ol style="list-style-type: none"> 1. This development stretches into the green wedge, and would have a significant impact on biodiversity and the wildlife corridor which stretches out into the countryside. Oadby and Wigston are to be commended for the way in which they have championed the green agenda and protected green wedges, and all their hard work would be undermined by a development on the green wedge which would also increase the impact of the borough on climate change. 2. The plan to approach this land via Sutton Close is alarming. Traffic at the start and end of the school day along Briar Meads, Briar Walk and The Ridgeway/Howden Road is already a major concern, with over 3400 children and young people departing at the same time and many parents choosing to drive to drop off and collect, against the strong advice of the schools. Parking already reaches the Sutton Close/Briar Meads junction, and with Brocks Hill due to add another 180 places (30 per year group) it is inevitable that Sutton Close and the continuing loop round Briar Meads will become very congested and 	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>difficult to drive through due to parental parking. Sutton Close is a narrow road which does not have sufficient breadth to become the main route into a new housing development.</p> <p>3. IF the plan to build was to go ahead despite being on the green wedge, a far better approach would be to bring traffic to the land via the A6 and Cottage Farm. It seems likely the council will be under pressure to create a arch wrapping round the existing developments of O&W, spreading from Cottage Farm through to the new housing in Wigston off the A50. If this becomes a necessity, the existing housing estate, with its 3 large schools, does not have the capacity to take traffic for the new development, whereas Section 106 funding could be used to ensure that all new traffic approaches from beyond the existing estate. It would also be essential to create pedestrian back routes into the schools to allow easy access for families and to support the school travel plans.</p>	
Local Resident, 15 th May 2024	OAD/008	<p>Half of Glen Gorse Golf Course</p> <p>Objection</p> <p>The site of Glen Gorse golf course as a development site, if it went ahead, would lose a unique opportunity. This beautiful, landscaped area of land could be linked up with Brockshill country park, thus creating a proper country park, much needed as part of the green infrastructure.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 15 th	OAD/009	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Primary Masterplan)</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its</p>

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May 2024		<p>Objection</p> <p>I did, eventually find the maps and aerial photographs relating to the sites that have been offered for development. I note that the ones in Oadby, notably, OAD 002; OAD 009; OAD 0010; OAD 0015 constitute a very large proportion of the green wedge between the Borough and the city, which the plan expressly says is very important. I do not think this land should be build on as it provides an essential “green lung” for the local population.</p> <p>The site of Glen Gorse golf course as a development site, if it went ahead, would lose a unique opportunity. This beautiful, landscaped area of land could be linked up with Brockshill country park, thus creating a proper country park, much needed as part of the green infrastructure.</p>	<p>decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Residents (family of 6), 15 th May 2024	OAD/009	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Primary Masterplan)</p> <p>Objection</p> <p>We are taking legal advice, as we have fully redone our house with balconies to appreciate the view hence why we purchased the property. We do not want to see houses behind our house on MANOR ROAD EXTENSION. From behind Gartree road.</p> <p>We want preserve the beautiful countryside behind us and so our neighbourhood doesn’t become a large building site in the medium term, and a congested gateway to a large housing estate in the longer term.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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Local Resident, 15 th May 2024	OAD/009	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Primary Masterplan)</p> <p>Objection</p> <p>I strongly object to further homes being built on the land behind Manor Road Extension and Copse Close and south of the University of Leicester playing fields. When we moved to Manor Rd Extension over 25 years ago we were told that no houses can be built on that land as it is water logged.</p> <p>The new houses already built at the junction of Shady Lane and Gartree Road already cause flooding on the stretch of Gartree Road between the Spire Hospital and Shady Lady. Since the construction of those houses, every time there is heavy rain there is flooding on that stretch of Road and nothing has been done to address the problem. Building further houses on the nearby land will only exacerbate the problem.</p> <p>There are plenty of brownfield sites available and we do not need any more of the countryside concreted around Stoughton Rd and Gartree Road.</p> <p>There is already congestion getting out of Oadby and there are not enough public services like GPs and schools to accommodate the extra population.</p> <p>Also why have we not been told about this planning as we only found out by chance when it was too late to attend any consultation meetings. We feel there has been a deliberate lack of information sent out about this proposed planning and this is being done for the council to avoid objections</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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Local Resident, 2 nd May 2024	OAD/009	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Primary Masterplan)</p> <p>Objection</p> <p>In particular I strongly object to the proposal for the area behind Manor Road Extension, Copse Close This land is regularly used agricultural land and owned by the Co-op. There is already substantial building / new estate in this area The land behind Copse Close is actually in Stoughton not Oadby Please do not build on the green space we have – use brown field space</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 16 th May 2024	OAD/009	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Primary Masterplan)</p> <p>Objection</p> <p>I have reservations regarding the new local plan potential impact on our home, particularly regarding privacy and enjoyment. Additionally, I worry about the proposed development's effect on our community's infrastructure, green spaces, flooding, biodiversity, and adherence to environmental policies like 'net zero' and 'net game'.</p> <p>Furthermore, I am apprehensive about the potential impact on my house's market value.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 6 th May 2024	OAD/009	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Primary Masterplan)</p> <p>Objection</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on</p>

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		<p>Hello I totally disagree with the plans .I have been a resident living in this house for the 20 years .</p> <p>The plans will destroy the land at rear of Copse Close and Manor Road Extension. There will a lot of traffic as it is the traffic problems are bad at school times . The beauty land at rear will be destroyed with houses . Already we seen new houses going up in this area. Which is Causing problems.</p> <p>The house prices will be affected and the area will be populated.</p> <p>I there for strongly recommend this plan does Not go ahead.</p> <p>Please therefore consider this plans carefully.</p>	<p>each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
<p>Local Resident, 14th May 2024</p>	<p>OAD/009</p>	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Primary Masterplan)</p> <p>Objection</p> <p>I am writing to comment specifically on the following submissions as Site Options.</p> <ul style="list-style-type: none"> • OAD/002, Land South of Gartree Road, Oadby • OAD/009, Land South of Gartree Road and East of Stoughton Road, Oadby (Primary Masterplan) • OAD/010, Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 1) • OAD/011, Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 2) 	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>These submissions would have a very significant impact upon the character of the local area and would result in building on greenfield land which currently forms part of the Oadby and Wigston Green Wedge north of Manor Road Extension and Copse Close.</p> <p>1. Impact on Green Wedge: The submitted sites above directly contradicts the Borough Council's existing environmental plan, which aims to preserve green wedges. The proposed sites above all fall within one of the Green Wedges noted in 2.5.2 of the Spatial Portrait of the Local Plan. These areas are vital for maintaining the character and ecological balance of Oadby.</p> <p>2. Impact on Biodiversity: The submitted sites note the established hedgerows and mature trees and which provide an important habitat for insects, small mammals, and birdlife. The development would have a detrimental effect on biodiversity, disrupting a long-established ecosystem. The Spatial Portrait of the Local Plan notes the patchy level of tree cover across the borough and these proposed developments would significantly damage tree cover.</p> <p>3. Impact on Road Transport. The sites above would lead to increased traffic congestion: The local roads are already facing significant congestion issues, in particular Gartree Road, Stoughton Road and Manor Road have increased in traffic significantly due to recent development in the land opposite and adjacent to Stoughton Grange Farm. Additional housing will only exacerbate the problem. This is already noted in section 2.4.1 of Spatial Portrait of the Local Plan: <i>'Due to this poor access</i></p>	

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		<p><i>to main arterial routes and the fact that the three routes into Leicester City from the south pass through the Borough, the Borough's roads suffer from significant congestion, particularly at peak times.'</i></p> <p>4. Impact on Local Services. NHS GP & Dental services are already under considerable strain. The creation of a further 600-450 homes within this area would put considerable pressure upon Severn Surgery which is already struggling to cope with the current population. Similarly, Manor High School is highly oversubscribed, despite increasing pupil numbers from August 2024.</p> <p>5. Impact on Farmland & food security. Although beyond the scope of the current local plan, the proposed sites would lead to a direct loss of arable land, which would damage national food security plans developed in the 2024 Farm to Fork Summit.</p> <p>While I recognise that it is important the Borough Council works to meet local housing need and support much of the plan's aims, Site Options OAD/002, OAD/009, OAD/010, OAD/011 are unsuitable. I note that these will be subject to independent scrutiny by a Planning Inspector following the creation of the Local Plan and I trust that these proposals will be rejected given their negative local impacts.</p>	
Local Resident, 12 th May 2024	OAD/009	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Primary Masterplan)</p> <p>Objection</p>	The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.

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		<p>I would like to raise a very serious objection to the proposed development on this site/fields on the following grounds.</p> <p>I'll be raising issues over:</p> <ul style="list-style-type: none"> • loss of green wedge & access to countryside • loss of biodiversity / protecting precious habits and established hedgerows • loss of food security by building on farm land • lack of local resources regarding GPs & schools • issues with local road transport and distance from public transport • failure to meet local need in terms of affordable housing • failure to meet local need in terms of type of housing- greatest need are bungalows, assessable housing & sheltered housing given age profile older than Leicester & national average .destroying green fields and fresh air producing environmental in a very congested area. .no requirement for further development in this part of the county. . unnecessary political influences and cause for ethnic split and bias to already good harmonies society .for the wellbeing on the users of the residents and users of the ramblers. <p>very very bad decision/proposal and irresponsible of the oadby & wigston council.</p>	<p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
<p>Local Resident, 14th May 2024</p>	<p>OAD/009</p>	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Primary Masterplan)</p> <p>Objection</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been</p>

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		<p>I have been a resident in my property at 21 Manor Road Extension since November 2019. One of the main reasons we bought our property was because of the outstanding views and local public walk ways and wild life including owls, bats, badgers, foxes and muntjacs.</p> <p>When we came to hear of the potential development of 600 dwellings, we were alarmed at the thought of losing the glorious views and the knock-on effect it would have on the local wildlife.</p> <p>Please see my points below which are cause for concerns and my reasons to object the development:</p> <ul style="list-style-type: none"> • It will have a detrimental impact on the wild life and native species of plants by loss of natural habit for animals, which has been presents for hundreds of years, and will have a significant visual impact on the landscape. • Has the council investigated for the presence of greater crested newts in this region? These are protected under the Wildlife and Countryside Act and the Conservations of Habitats and Species Regulations 2010. • The construction will last years and will lead to pollution, noise, congestion, traffic and a strain on local amenities, schools and bus services. There are not enough bus routes and frequency of buses, which will lead to more car use and pollution. 600 homes will lead to a minimum increase of 600 cars in this part of Oadby. Local schools are already at maximum capacity with waiting lists for children. GP's (general medical practitioners) are oversubscribed and waiting times are unacceptable, the development of the new homes will add further detriment to GP services. • There will also be a potential increase in crime which is bad enough in Oadby, please see the local crime statistics. 	<p>considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<ul style="list-style-type: none"> • My wife and daughter also suffer from allergies which will only be aggravated by the dust and pollution created by the building work. • We also have a 2 months old baby, who's daytime sleep will be disturbed by construction during the day time. • I understand that the area is often heavily saturated following significant amounts of rainfall and I have noticed flooding in the fields which causes me concern about water drainage and the potential for a water table to be created. As you may be aware, the soil in Leicester has a high quantity of clay in it which drains surface water very poorly. I have noticed more flooding and more houses will lead to less ground being available to take the water and then lead to flooding elsewhere and drain overflow. • In addition, there is a significant safety concern due to the proximity to the local airport. The flight path for take off and landing lies immediately over the proposed development site, over which the plane will be flying at low altitude. This poses a serious risk especially as this is a training airport for pilots. In addition, during the construction work I am sure there will be cranes in use, which will be dangerously close to the low flying planes. The construction work itself will create dust and dirt which poses a danger to the low flying planes flying over the area highlighted for development. • The development itself will lead to a loss of privacy for all residents of Manor Road Extension and Copse Close as this area was not previously over looked and the development itself will be totally out of character for the appearance of the rest of the area, where homes were built over 70 years ago. • The road infrastructure is very narrow in these parts of Oadby in particular Shady Lane (which is a very heavily used through road between Evington and Oadby), Gartree Road and Stoughton drive. The roads will not be able to cope with increased traffic flow which could 4 Preferred Options 	

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		<p>(Regulation 18B) Draft Local Plan Consultation (Wednesday 3 April 2024 – Wednesday 15 May 2024) Regulation 18B Preferred Options – Submission Form lead to an increase in road traffic accidents. The traffic flow increase can be demonstrated around the new houses already built around Stoughton Farm Park. Modern housing is built on a much smaller scale and capacity for parking personal cars is much less, this will lead to cars parked on narrow roads and thus create a health and safety risk.</p> <ul style="list-style-type: none"> • This type of development in Leicester and Leicestershire has already led to less green fields which in turn leads to less leisure and fresh air. Dog walkers are using this field every day. At a time such as COVID lockdown, these are the things which people valued the most. <p>I implore you consider all the above and I would like to make it clear that I am putting forward my firm objection to this construction due to the grounds I have stated. I would like a full response to all my points.</p>	
Local Resident, 15 th May	OAD/009	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Primary Masterplan)</p> <p>Objection</p> <p>I object to the building on green space which you acknowledge will effectively destroy the wildlife and landscape. It will also seriously devalue any of the homes along Manor Road Extension.</p> <p>My family home is on this road, and one of the main reasons for purchasing was because of the beautiful views. My parents who own the property were also informed it is waterlogged.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>You have already created flooding issues by building close to this site, and this will only add to the problem, and create even more traffic.</p> <p>Oadby does NOT have the infrastructure or facilities to accommodate more people.</p>	
Local Resident, 15 th May 2024	OAD/009	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Primary Masterplan)</p> <p>Objection</p> <p>I Nilesh Patel of 20 Copse Close, Oadby, Leicester. LE2 4FB – object to the development of new builds on fields behind Copse Close and Manor Road extension.</p> <p>My reason of objection are of the following.</p> <ul style="list-style-type: none"> • Impact on local services – need for additional school places and strain on local GP practices with Severn Surgery already struggling. • Impact on traffic with local roads already congested. • Impact on wildlife and hedgerows for insects, small mammals and birdlife. • Impact on footpaths and right of way used for leisure and dog walking. • Loss of green wedge which is part of council’s environmental plan. • Housing planned in areas without significant employment for residents. • Change of landscape of Oadby and Leicestershire and potential impact on the value of properties. 	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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Local Resident, 17 th May 2024	OAD/009	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Primary Masterplan)</p> <p>Objection</p> <p>My husband and I would like to object to the above plan</p> <p>There is already flooding on Gartree road since the building of new houses near Shady lane and this plan is likely to worsen this.</p> <p>There does not seem to be any thought to improve infrastructure namely roads and drainage annd schools and we fear this will worsen traffic congestion as well as increase risk of flooding. The daily commute to and from work will lengthen.</p> <p>Loss of the green areas will affect people’s mental health as well</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 16 th May 2024	OAD/009	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Primary Masterplan)</p> <p>Objection</p> <p>Deeply concerned with recent plans to develop new houses in above area.</p> <p>This area is fast becoming very congested with recent developments in this area & strongly object to new plans to make it worse</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 14 th May 2024	OAD/009	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Primary Masterplan)</p> <p>Objection</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on</p>

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		<p>My Family and I have lived here since 1985 and before that on Tamer Road since 1974.</p> <p>Have made every effort to grow trees and enhance greenery in the garden. Been composting at home for ever and doing every thintg to help save the environment.</p> <p>The green fields at the back of my house, here with the copse is the best for all the wild life and creatures and insects. All the birds and the owl I hear every day.</p> <p>If we wanted congestion, no Drs appointment's, No fresh air, we woud have lived in the city.</p> <p>Eventully the town centres will die with lack of parking, shops will close as we have seen in Oadby,</p> <p>Please leave the green fields and the habitat alone.</p>	<p>each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
<p>Local Resident, 11th May 2024</p>	<p>OAD/009</p>	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Primary Masterplan)</p> <p>Objection</p> <p>This local plan represents the systematic large scale eradication of green space and countryside around Oadby, and will have a permanent detrimental effect on the character of Oadby including the gap between Oadby and Wigston filled in with housing, and development all around the edge of Oadby.</p> <p>The communication of this has incredibly poor, to the point of dishonesty, with many Oadby residents still being unaware despite the gravity and importance of this consultation. I request that the consultation period is extended to allow proper communication, including leaflet drop/ email to Oadby and Wigston residents.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p> <p>The Council is committed to ensuring that residents of the Borough have access to appropriate local services and facilities. The New Local Plan will be a key factor in ensuring that such facilities and services are realised in the longer term. The Council is also required by Government, to provide new homes that meet local needs. Unmet housing needs from</p>

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		<p>In addition, the house building aspect of this plan is built on a false premise. Over 1000 of the 5,040 homes proposed to be built in Oadby and Wigston over the 21 years of the plan are NOT for local need, but the result of the council voting to accept overspill housing from Leicester city, despite there being no legal requirement to do this and there being many more currently derelict brownfield sites in the City which have not yet been explored.</p> <p>This response relates to Oad/002, Oad/009, Oad/010 and Oad/111, which are part of the Oadby portion of the Oadby, Thurnby and Stoughton green wedge.</p> <p>As stated in Policy 33, green wedges are valuable areas of green land within the Borough. In 2017 Oadby and Wigston council stated that:</p> <ul style="list-style-type: none"> • The part of the green wedge that is situated within the Borough of Oadby and Wigston prevents the merging of Oadby with parts of Leicester around the golf course that branch out towards the village of Stoughton. • The green wedge plays a key role in the green infrastructure network of the Borough and ensures there is a continuous network running from Leicester City to the countryside areas of the Borough and Harborough District beyond. • The green wedge boundary is distinctly defined; it is very much urban one side, open green wedge (and its associated 37 infrastructure) the other. • The green wedge spans local authority boundaries with Leicester City and Harborough District and provides a 'green lung' stretching from the more inner city urban 	<p>neighbouring local authorities can form part of local housing needs.</p> <p>Paragraph 24 of the National Planning Policy Framework (NPPF) states that '<i>Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries</i>'. Housing need is a cross boundary matter for all local authority areas within the Leicester and Leicestershire Housing Market Area, therefore cannot be ignored.</p> <p>The NPPF further states at paragraph 26 states that '<i>effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere</i>'.</p> <p>NPPF paragraph 67 goes onto state that '<i>strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment...</i>'.</p>

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		<p>areas of Leicester City to the open countryside areas of the Borough and Harborough District.</p> <ul style="list-style-type: none"> As well as providing access to the countryside for the Borough's human population, the green wedge is a key part of the Borough's green infrastructure network which enables species to use features within all elements of the Borough's rural and urban landscape. <p>Policy 33 states that the Council will retain these areas as open and undeveloped. However site allocations listed above contradicts this as they form the bulk of this green wedge. The Regulation 18b local plan proposes several options which in effect eliminates this green wedge in almost its entirety, except for the majority of the University playing fields. This would have a significantly detrimental effect on the local area.</p> <p>These fields are an essential green lung that are used by walkers, runners and wildlife enthusiasts where they act as an open and undeveloped recreational resource. They host a wide range of species including bats, badgers, deer, stoats, kestrels, buzzards and red kites. The destruction of this countryside would represent a historic and catastrophic change to the character of Oadby.</p>	<p>In 2022, Local Authorities within the Leicester and Leicestershire Housing Market Area agreed a Statement of Common Ground (SoCG) in relation to Leicester City's declared unmet housing and employment needs. As part of this SoCG, the Council agreed the principle of accommodating a portion of Leicester City's unmet housing need. Unless evidence suggests otherwise, the Council will be required through the SoCG to accommodate a portion of Leicester City's unmet housing need within the New Local Plan.</p> <p>It is clear from the above, that the Council has a duty to take account of the unmet housing needs of other local authority areas. The ability for the Council to accommodate additional unmet housing needs of neighbouring local authorities will be evidence led. The Council has prepared the necessary evidence, which has informed the Regulation 19 Pre-Submission Draft Plan.</p>
Local Resident, 9 th May 2024	OAD/009	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Primary Masterplan)</p> <p>Objection</p> <p>I Object on the above planning reference number.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p>

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		<p>The area will have full impact in the area</p> <ul style="list-style-type: none"> • local character (including landscape setting); • safe, connected and efficient streets; • a strong network of green spaces (including parks) and public places; • crime prevention; • high quality architecture; • access, inclusion and health; • efficient use of natural resources; • cohesive and vibrant neighbourhoods; • air quality and air quality management; • sustainable construction; and, • climate change. <p>As you can see the impact which has happened and is happening after the houses which were built in the Stoughton area which is affecting all routers to outer oadby.</p> <p>This points were stated on the Stoughton development but see the impact its having now, so in short words its all talk and writing and nothing has been taking seriously and into consideration and this is always the case.</p>	<p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
<p>Local Resident, 9th May 2024</p>	<p>OAD/010</p>	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 1)</p> <p>Objection</p> <p>Object on the above planning reference number.</p> <p>The area will have full impact in the area</p> <ul style="list-style-type: none"> • local character (including landscape setting); 	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish</p>

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Local Residents (family of 6), 15 th May 2024	OAD/010	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 1)</p> <p>Objection</p> <p>We are taking legal advice, as we have fully redone our house with balconies to appreciate the view hence why we purchased the property. We do not want to see houses behind our house on MANOR ROAD EXTENSION. From behind Gartree road.</p> <p>We want preserve the beautiful countryside behind us and so our neighbourhood doesn't become a large building site in</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach..</p>

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		the medium term, and a congested gateway to a large housing estate in the longer term.	
Local Resident, 14 th May 2024	OAD/010	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 1)</p> <p>Objection</p> <p>I am writing to comment specifically on the following submissions as Site Options.</p> <ul style="list-style-type: none"> • OAD/002, Land South of Gartree Road, Oadby • OAD/009, Land South of Gartree Road and East of Stoughton Road, Oadby (Primary Masterplan) • OAD/010, Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 1) • OAD/011, Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 2) <p>These submissions would have a very significant impact upon the character of the local area and would result in building on greenfield land which currently forms part of the Oadby and Wigston Green Wedge north of Manor Road Extension and Copse Close.</p> <p>1. Impact on Green Wedge: The submitted sites above directly contradicts the Borough Council's existing environmental plan, which aims to preserve green wedges. The proposed sites above all fall within one of the Green Wedges noted in 2.5.2 of the Spatial Portrait of the Local Plan. These areas are vital for maintaining the character and ecological balance of Oadby.</p> <p>2. Impact on Biodiversity:</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>The submitted sites note the established hedgerows and mature trees and which provide an important habitat for insects, small mammals, and birdlife. The development would have a detrimental effect on biodiversity, disrupting a long-established ecosystem. The Spatial Portrait of the Local Plan notes the patchy level of tree cover across the borough and these proposed developments would significantly damage tree cover.</p> <p>3. Impact on Road Transport. The sites above would lead to increased traffic congestion: The local roads are already facing significant congestion issues, in particular Gartree Road, Stoughton Road and Manor Road have increased in traffic significantly due to recent development in the land opposite and adjacent to Stoughton Grange Farm. Additional housing will only exacerbate the problem. This is already noted in section 2.4.1 of Spatial Portrait of the Local Plan: <i>'Due to this poor access to main arterial routes and the fact that the three routes into Leicester City from the south pass through the Borough, the Borough's roads suffer from significant congestion, particularly at peak times.'</i></p> <p>4. Impact on Local Services. NHS GP & Dental services are already under considerable strain. The creation of a further 600-450 homes within this area would put considerable pressure upon Severn Surgery which is already struggling to cope with the current population. Similarly, Manor High School is highly oversubscribed, despite increasing pupil numbers from August 2024.</p> <p>5. Impact on Farmland & food security. Although beyond the scope of the current local plan, the proposed sites would lead to a direct loss of arable land, which would damage national</p>	

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		<p>food security plans developed in the 2024 Farm to Fork Summit.</p> <p>While I recognise that it is important the Borough Council works to meet local housing need and support much of the plan's aims, Site Options OAD/002, OAD/009, OAD/010, OAD/011 are unsuitable. I note that these will be subject to independent scrutiny by a Planning Inspector following the creation of the Local Plan and I trust that these proposals will be rejected given their negative local impacts.</p>	
Local Resident, 14 th May 2024	OAD/010	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 1)</p> <p>Objection</p> <p>I have been a resident in my property at 21 Manor Road Extension since November 2019. One of the main reasons we bought our property was because of the outstanding views and local public walk ways and wild life including owls, bats, badgers, foxes and muntjacs.</p> <p>When we came to hear of the potential development of 380 dwellings and a cemetery, we were alarmed at the thought of losing the glorious views and the knock-on effect it would have on the local wildlife.</p> <p>Please see my points below which are cause for concerns and my reasons to object the development:</p> <ul style="list-style-type: none"> • It will have a detrimental impact on the wild life and native species of plants by loss of natural habit for animals, which 	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>has been presents for hundreds of years, and will have a significant visual impact on the landscape.</p> <ul style="list-style-type: none"> • Has the council investigated for the presence of greater crested newts in this region? These are protected under the Wildlife and Countryside Act and the Conservations of Habitats and Species Regulations 2010. • The construction will last years and will lead to pollution, noise, congestion, traffic and a strain on local amenities, schools and bus services. There are not enough bus routes and frequency of buses, which will lead to more car use and pollution. 380 homes will lead to a minimum increase of 380 cars in this part of Oadby. Local schools are already at maximum capacity with waiting lists for children. GP's (general medical practitioners) are oversubscribed and waiting times are unacceptable, the development of the new homes will add further detriment to GP services. • There will also be a potential increase in crime which is bad enough in Oadby, please see the local crime statistics. • My wife and daughter also suffer from allergies which will only be aggravated by the dust and pollution created by the building work. • We also have a 2 months old baby, who's daytime sleep will be disturbed by construction during the day time. • I understand that the area is often heavily saturated following significant amounts of rainfall and I have noticed flooding in the fields which causes me concern about water drainage and the potential for a water table to be created. As you may be aware, the soil in Leicester has a high quantity of clay in it which drains surface water very poorly. I have noticed more flooding and more houses will lead to less ground being available to take the water and then lead to flooding elsewhere and drain overflow. • In addition, there is a significant safety concern due to the proximity to the local airport. The flight path for take off and 	

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		<p>landing lies immediately over the proposed development site, over which the plane will be flying at low altitude. This poses a serious risk especially as this is a training airport for pilots. In addition, during the construction work I am sure there will be cranes in use, which will be dangerously close to the low flying planes. The construction work itself will create dust and dirt which poses a danger to the low flying planes flying over the area highlighted for development.</p> <ul style="list-style-type: none"> • The development itself will lead to a loss of privacy for all residents of Manor Road Extension and Copse Close as this area was not previously over looked and the development itself will be totally out of character for the appearance of the rest of the area, where homes were built over 70 years ago. • The road infrastructure is very narrow in these parts of Oadby in particular Shady Lane (which is a very heavily used through road between Evington and Oadby), Gartree Road and 4 Preferred Options (Regulation 18B) Draft Local Plan Consultation (Wednesday 3 April 2024 – Wednesday 15 May 2024) Regulation 18B Preferred Options – Submission Form Stoughton drive. The roads will not be able to cope with increased traffic flow which could lead to an increase in road traffic accidents. The traffic flow increase can be demonstrated around the new houses already built around Stoughton Farm Park. Modern housing is built on a much smaller scale and capacity for parking personal cars is much less, this will lead to cars parked on narrow roads and thus create a health and safety risk. • This type of development in Leicester and Leicestershire has already led to less green fields which in turn leads to less leisure and fresh air. Dog walkers are using this field every day. At a time such as COVID lockdown, these are the things which people valued the most. • I find it morbid to think of a cemetery being built opposite my home and have to see this and funeral processions everyday 	

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		<p>from my home. This area is very visible from where my home is. The cemetery will lead to increase congestion during the day and also on weekend due to funeral processions and visitors. In turn, increasing the risk of road traffic accidents on the narrow road in this part of Oadby.</p> <p>I implore you consider all the above and I would like to make it clear that I am putting forward my firm objection to this construction due to the grounds I have stated. I would like a full response to all my points.</p>	
Local Resident, 15 th May 2024	OAD/010	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 1)</p> <p>Objection</p> <p>I Nilesh Patel of 20 Copse Close, Oadby, Leicester. LE2 4FB – object to the development of new builds on fields behind Copse Close and Manor Road extension.</p> <p>My reason of objection are of the following.</p> <ul style="list-style-type: none"> • Impact on local services – need for additional school places and strain on local GP practices with Severn Surgery already struggling. • Impact on traffic with local roads already congested. • Impact on wildlife and hedgerows for insects, small mammals and birdlife. • Impact on footpaths and right of way used for leisure and dog walking. • Loss of green wedge which is part of council’s environmental plan. 	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<ul style="list-style-type: none"> • Housing planned in areas without significant employment for residents. • Change of landscape of Oadby and Leicestershire and potential impact on the value of properties. 	
Local Resident, 17 th May 2024	OAD/010	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 1)</p> <p>Objection</p> <p>My husband and I would like to object to the above plan</p> <p>There is already flooding on Gartree road since the building of new houses near Shady lane and this plan is likely to worsen this.</p> <p>There does not seem to be any thought to improve infrastructure namely roads and drainage and schools and we fear this will worsen traffic congestion as well as increase risk of flooding. The daily commute to and from work will lengthen.</p> <p>Loss of the green areas will affect people's mental health as well</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 16 th May 2024	OAD/010	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 1)</p> <p>Objection</p> <p>Deeply concerned with recent plans to develop new houses in above area.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification</p>

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		This area is fast becoming very congested with recent developments in this area & strongly object to new plans to make it worse	for its approach. In addition, the Council will publish background evidence to underpin its approach.
Local Resident, 11 th May 2024	OAD/010	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 1)</p> <p>Objection</p> <p>This local plan represents the systematic large scale eradication of green space and countryside around Oadby, and will have a permanent detrimental effect on the character of Oadby including the gap between Oadby and Wigston filled in with housing, and development all around the edge of Oadby.</p> <p>The communication of this has incredibly poor, to the point of dishonesty, with many Oadby residents still being unaware despite the gravity and importance of this consultation. I request that the consultation period is extended to allow proper communication, including leaflet drop/ email to Oadby and Wigston residents.</p> <p>In addition, the house building aspect of this plan is built on a false premise. Over 1000 of the 5,040 homes proposed to be built in Oadby and Wigston over the 21 years of the plan are NOT for local need, but the result of the council voting to accept overspill housing from Leicester city, despite there being no legal requirement to do this and there being many more currently derelict brownfield sites in the City which have not yet been explored.</p> <p>This response relates to Oad/002, Oad/009, Oad/010 and Oad/111, which are part of the Oadby portion of the Oadby, Thurnby and Stoughton green wedge.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach. The Council is committed to ensuring that residents of the Borough have access to appropriate local services and facilities. The New Local Plan will be a key factor in ensuring that such facilities and services are realised in the longer term. The Council is also required by Government, to provide new homes that meet local needs. Unmet housing needs from neighbouring local authorities can form part of local housing needs.</p> <p>Paragraph 24 of the National Planning Policy Framework (NPPF) states that '<i>Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries</i>'. Housing need is a cross boundary matter for all local authority areas within the Leicester and Leicestershire Housing Market Area, therefore cannot be ignored.</p>

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		<p>As stated in Policy 33, green wedges are valuable areas of green land within the Borough. In 2017 Oadby and Wigston council stated that:</p> <ul style="list-style-type: none"> • The part of the green wedge that is situated within the Borough of Oadby and Wigston prevents the merging of Oadby with parts of Leicester around the golf course that branch out towards the village of Stoughton. • The green wedge plays a key role in the green infrastructure network of the Borough and ensures there is a continuous network running from Leicester City to the countryside areas of the Borough and Harborough District beyond. • The green wedge boundary is distinctly defined; it is very much urban one side, open green wedge (and its associated 37 infrastructure) the other. • The green wedge spans local authority boundaries with Leicester City and Harborough District and provides a 'green lung' stretching from the more inner city urban areas of Leicester City to the open countryside areas of the Borough and Harborough District. • As well as providing access to the countryside for the Borough's human population, the green wedge is a key part of the Borough's green infrastructure network which enables species to use features within all elements of the Borough's rural and urban landscape. <p>Policy 33 states that the Council will retain these areas as open and undeveloped. However site allocations listed above contradicts this as they form the bulk of this green wedge.</p>	<p>The NPPF further states at paragraph 26 states that <i>'effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere'</i>.</p> <p>NPPF paragraph 67 goes onto state that <i>'strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment...'</i></p> <p>In 2022, Local Authorities within the Leicester and Leicestershire Housing Market Area agreed a Statement of Common Ground (SoCG) in relation to Leicester City's declared unmet housing and employment needs. As part of this SoCG, the Council agreed the principle of accommodating a portion of Leicester City's unmet housing need. Unless evidence suggests otherwise, the Council will be required through the SoCG to accommodate a portion of Leicester City's unmet housing need within the New Local Plan.</p>

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		<p>The Regulation 18b local plan proposes several options which in effect eliminates this green wedge in almost its entirety, except for the majority of the University playing fields. This would have a significantly detrimental effect on the local area.</p> <p>These fields are an essential green lung that are used by walkers, runners and wildlife enthusiasts where they act as an open and undeveloped recreational resource. They host a wide range of species including bats, badgers, deer, stoats, kestrels, buzzards and red kites. The destruction of this countryside would represent a historic and catastrophic change to the character of Oadby.</p>	<p>It is clear from the above, that the Council has a duty to take account of the unmet housing needs of other local authority areas. The ability for the Council to accommodate additional unmet housing needs of neighbouring local authorities will be evidence led. The Council has prepared the necessary evidence, which has informed the Regulation 19 Pre-Submission Draft Plan.</p>
Local Resident,	OAD/010	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 1)</p> <p>Objection</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 15 th May 2024	OAD/010	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 1)</p> <p>Objection</p> <p>I did, eventually find the maps and aerial photographs relating to the sites that have been offered for development. I note that the ones in Oadby, notably, OAD 002; OAD 009; OAD 0010; OAD 0015 constitute a very large proportion of the green wedge between the Borough and the city, which the</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish</p>

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		plan expressly says is very important. I do not think this land should be build on as it provides an essential “green lung” for the local population.	background evidence to underpin its approach.
Local Residents (family of 6), 15 th May 2024	OAD/011	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 2)</p> <p>Objection</p> <p>We are taking legal advice, as we have fully redone our house with balconies to appreciate the view hence why we purchased the property. We do not want to see houses behind our house on MANOR ROAD EXTENSION. From behind Gartree road.</p> <p>We want preserve the beautiful countryside behind us and so our neighbourhood doesn’t become a large building site in the medium term, and a congested gateway to a large housing estate in the longer term.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 14 th May 2024	OAD/011	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 2)</p> <p>Objection</p> <p>I am writing to comment specifically on the following submissions as Site Options.</p> <ul style="list-style-type: none"> • OAD/002, Land South of Gartree Road, Oadby • OAD/009, Land South of Gartree Road and East of Stoughton Road, Oadby (Primary Masterplan) • OAD/010, Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 1) • OAD/011, Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 2) 	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>These submissions would have a very significant impact upon the character of the local area and would result in building on greenfield land which currently forms part of the Oadby and Wigston Green Wedge north of Manor Road Extension and Copse Close.</p> <p>1. Impact on Green Wedge: The submitted sites above directly contradicts the Borough Council's existing environmental plan, which aims to preserve green wedges. The proposed sites above all fall within one of the Green Wedges noted in 2.5.2 of the Spatial Portrait of the Local Plan. These areas are vital for maintaining the character and ecological balance of Oadby.</p> <p>2. Impact on Biodiversity: The submitted sites note the established hedgerows and mature trees and which provide an important habitat for insects, small mammals, and birdlife. The development would have a detrimental effect on biodiversity, disrupting a long-established ecosystem. The Spatial Portrait of the Local Plan notes the patchy level of tree cover across the borough and these proposed developments would significantly damage tree cover.</p> <p>3. Impact on Road Transport. The sites above would lead to increased traffic congestion: The local roads are already facing significant congestion issues, in particular Gartree Road, Stoughton Road and Manor Road have increased in traffic significantly due to recent development in the land opposite and adjacent to Stoughton Grange Farm. Additional housing will only exacerbate the problem. This is already noted in section 2.4.1 of Spatial Portrait of the Local Plan: <i>'Due to this poor access</i></p>	

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		<p><i>to main arterial routes and the fact that the three routes into Leicester City from the south pass through the Borough, the Borough's roads suffer from significant congestion, particularly at peak times.'</i></p> <p>4. Impact on Local Services. NHS GP & Dental services are already under considerable strain. The creation of a further 600-450 homes within this area would put considerable pressure upon Severn Surgery which is already struggling to cope with the current population. Similarly, Manor High School is highly oversubscribed, despite increasing pupil numbers from August 2024.</p> <p>5. Impact on Farmland & food security. Although beyond the scope of the current local plan, the proposed sites would lead to a direct loss of arable land, which would damage national food security plans developed in the 2024 Farm to Fork Summit.</p> <p>While I recognise that it is important the Borough Council works to meet local housing need and support much of the plan's aims, Site Options OAD/002, OAD/009, OAD/010, OAD/011 are unsuitable. I note that these will be subject to independent scrutiny by a Planning Inspector following the creation of the Local Plan and I trust that these proposals will be rejected given their negative local impacts.</p>	
Local Resident, 14 th May 2024	OAD/011	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 2)</p> <p>Objection</p>	The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been

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		<p>I have been a resident in my property at 21 Manor Road Extension since November 2019. One of the main reasons we bought our property was because of the outstanding views and local public walk ways and wild life including owls, bats, badgers, foxes and muntjacs. When we came to hear of the potential development of 500 dwellings and a cemetery, we were alarmed at the thought of losing the glorious views and the knock-on effect it would have on the local wildlife. Please see my points below which are cause for concerns and my reasons to object the development:</p> <ul style="list-style-type: none"> • It will have a detrimental impact on the wild life and native species of plants by loss of natural habit for animals, which has been presents for hundreds of years, and will have a significant visual impact on the landscape. • Has the council investigated for the presence of greater crested newts in this region? These are protected under the Wildlife and Countryside Act and the Conservations of Habitats and Species Regulations 2010. • The construction will last years and will lead to pollution, noise, congestion, traffic and a strain on local amenities, schools and bus services. There are not enough bus routes and frequency of buses, which will lead to more car use and pollution. 500 homes will lead to a minimum increase of 500 cars in this part of Oadby. Local schools are already at maximum capacity with waiting lists for children. GP's (general medical practitioners) are oversubscribed and waiting times are unacceptable, the development of the new homes will add further detriment to GP services. <ul style="list-style-type: none"> • There will also be a potential increase in crime which is bad enough in Oadby, please see the local crime statistics. • My wife and daughter also suffer from allergies which will only be aggravated by the dust and pollution created by the building work. 	<p>considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<ul style="list-style-type: none"> • We also have a 2 months old baby, who's daytime sleep will be disturbed by construction during the day time. • I understand that the area is often heavily saturated following significant amounts of rainfall and I have noticed flooding in the fields which causes me concern about water drainage and the potential for a water table to be created. As you may be aware, the soil in Leicester has a high quantity of clay in it which drains surface water very poorly. I have noticed more flooding and more houses will lead to less ground being available to take the water and then lead to flooding elsewhere and drain overflow. • In addition, there is a significant safety concern due to the proximity to the local airport. The flight path for take off and landing lies immediately over the proposed development site, over which the plane will be flying at low altitude. This poses a serious risk especially as this is a training airport for pilots. In addition, during the construction work I am sure there will be cranes in use, which will be dangerously close to the low flying planes. The construction work itself will create dust and dirt which poses a danger to the low flying planes flying over the area highlighted for development. • The development itself will lead to a loss of privacy for all residents of Manor Road Extension and Copse Close as this area was not previously over looked and the development itself will be totally out of character for the appearance of the rest of the area, where homes were built over 70 years ago. • The road infrastructure is very narrow in these parts of Oadby in particular Shady Lane (which is a very heavily used through road between Evington and Oadby), Gartree Road and 4 Preferred Options (Regulation 18B) Draft Local Plan Consultation (Wednesday 3 April 2024 – Wednesday 15 May 2024) Regulation 18B Preferred Options – Submission Form Stoughton drive. The roads will not be able to cope with increased traffic flow which could lead to an increase in road 	

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		<p>traffic accidents. The traffic flow increase can be demonstrated around the new houses already built around Stoughton Farm Park. Modern housing is built on a much smaller scale and capacity for parking personal cars is much less, this will lead to cars parked on narrow roads and thus create a health and safety risk.</p> <ul style="list-style-type: none"> • This type of development in Leicester and Leicestershire has already led to less green fields which in turn leads to less leisure and fresh air. Dog walkers are using this field every day. At a time such as COVID lockdown, these are the things which people valued the most. • I find it morbid to think of a cemetery being built opposite my home and have to see this and funeral processions everyday from my home. This area is very visible from where my home is. The cemetery will lead to increase congestion during the day and also on weekend due to funeral processions and visitors. In turn, increasing the risk of road traffic accidents on the narrow road in this part of Oadby. <p>I implore you consider all the above and I would like to make it clear that I am putting forward my firm objection to this construction due to the grounds I have stated. I would like a full response to all my points.</p>	
Local Resident, 15 th May 2024	OAD/011	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 2)</p> <p>Objection</p> <p>I Nilesh Patel of 20 Copse Close, Oadby, Leicester. LE2 4FB – object to the development of new builds on fields behind Copse Close and Manor Road extension.</p> <p>My reason of objection are of the following.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<ul style="list-style-type: none"> • Impact on local services – need for additional school places and strain on local GP practices with Severn Surgery already struggling. • Impact on traffic with local roads already congested. • Impact on wildlife and hedgerows for insects, small mammals and birdlife. • Impact on footpaths and right of way used for leisure and dog walking. • Loss of green wedge which is part of council’s environmental plan. • Housing planned in areas without significant employment for residents. • Change of landscape of Oadby and Leicestershire and potential impact on the value of properties. 	
Local Resident, 17 th May 2024	OAD/011	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 2)</p> <p>Objection</p> <p>My husband and I would like to object to the above plan</p> <p>There is already flooding on Gartree road since the building of new houses near Shady lane and this plan is likely to worsen this.</p> <p>There does not seem to be any thought to improve infrastructure namely roads and drainage and schools and we fear this will worsen traffic congestion as well as increase risk of flooding. The daily commute to and from work will lengthen.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		Loss of the green areas will affect people's mental health as well	
Local Resident, 16 th May 2024	OAD/011	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 2)</p> <p>Objection</p> <p>Deeply concerned with recent plans to develop new houses in above area. This area is fast becoming very congested with recent developments in this area & strongly object to new plans to make it worse</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 1 th May 2024	OAD/011	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 2)</p> <p>Objection</p> <p>This local plan represents the systematic large scale eradication of green space and countryside around Oadby, and will have a permanent detrimental effect on the character of Oadby including the gap between Oadby and Wigston filled in with housing, and development all around the edge of Oadby. The communication of this has incredibly poor, to the point of dishonesty, with many Oadby residents still being unaware despite the gravity and importance of this consultation. I request that the consultation period is extended to allow proper communication, including leaflet drop/ email to Oadby and Wigston residents. In addition, the house building aspect of this plan is built on a false premise. Over 1000 of the 5,040 homes proposed to be built in Oadby and Wigston over the 21 years of the plan are</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach. The Council is committed to ensuring that residents of the Borough have access to appropriate local services and facilities. The New Local Plan will be a key factor in ensuring that such facilities and services are realised in the longer term. The Council is also required by Government, to provide new homes that meet local needs. Unmet housing needs from neighbouring local authorities can form part of local housing needs.</p>

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		<p>NOT for local need, but the result of the council voting to accept overspill housing from Leicester city, despite there being no legal requirement to do this and there being many more currently derelict brownfield sites in the City which have not yet been explored.</p> <p>This response relates to Oad/002, Oad/009, Oad/010 and Oad/111, which are part of the Oadby portion of the Oadby, Thurnby and Stoughton green wedge.</p> <p>As stated in Policy 33, green wedges are valuable areas of green land within the Borough. In 2017 Oadby and Wigston council stated that:</p> <ul style="list-style-type: none"> • The part of the green wedge that is situated within the Borough of Oadby and Wigston prevents the merging of Oadby with parts of Leicester around the golf course that branch out towards the village of Stoughton. • The green wedge plays a key role in the green infrastructure network of the Borough and ensures there is a continuous network running from Leicester City to the countryside areas of the Borough and Harborough District beyond. • The green wedge boundary is distinctly defined; it is very much urban one side, open green wedge (and its associated 37 infrastructure) the other. • The green wedge spans local authority boundaries with Leicester City and Harborough District and provides a 'green lung' stretching from the more inner city urban areas of Leicester City to the open countryside areas of the Borough and Harborough District. • As well as providing access to the countryside for the Borough's human population, the green 	<p>Paragraph 24 of the National Planning Policy Framework (NPPF) states that '<i>Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries</i>'. Housing need is a cross boundary matter for all local authority areas within the Leicester and Leicestershire Housing Market Area, therefore cannot be ignored.</p> <p>The NPPF further states at paragraph 26 states that '<i>effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere</i>'.</p> <p>NPPF paragraph 67 goes onto state that '<i>strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment...</i>'.</p>

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		<p>wedge is a key part of the Borough's green infrastructure network which enables species to use features within all elements of the Borough's rural and urban landscape.</p> <p>Policy 33 states that the Council will retain these areas as open and undeveloped. However site allocations listed above contradicts this as they form the bulk of this green wedge. The Regulation 18b local plan proposes several options which in effect eliminates this green wedge in almost its entirety, except for the majority of the University playing fields. This would have a significantly detrimental effect on the local area.</p> <p>These fields are an essential green lung that are used by walkers, runners and wildlife enthusiasts where they act as an open and undeveloped recreational resource. They host a wide range of species including bats, badgers, deer, stoats, kestrels, buzzards and red kites. The destruction of this countryside would represent a historic and catastrophic change to the character of Oadby.</p>	<p>In 2022, Local Authorities within the Leicester and Leicestershire Housing Market Area agreed a Statement of Common Ground (SoCG) in relation to Leicester City's declared unmet housing and employment needs. As part of this SoCG, the Council agreed the principle of accommodating a portion of Leicester City's unmet housing need. Unless evidence suggests otherwise, the Council will be required through the SoCG to accommodate a portion of Leicester City's unmet housing need within the New Local Plan.</p> <p>It is clear from the above, that the Council has a duty to take account of the unmet housing needs of other local authority areas. The ability for the Council to accommodate additional unmet housing needs of neighbouring local authorities will be evidence led. The Council has prepared the necessary evidence, which has informed the Pre-Submission Draft Plan.</p>
Local Resident, 9 th May 2024	OAD/011	<p>Land South of Gartree Road and East of Stoughton Road, Oadby (Variant Option 2)</p> <p>Objection</p> <p>I Object on the above planning reference number.</p> <p>The area will have full impact in the area</p> <ul style="list-style-type: none"> • local character (including landscape setting); • safe, connected and efficient streets; • a strong network of green spaces (including parks) and public places; 	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<ul style="list-style-type: none"> • crime prevention; • high quality architecture; • access, inclusion and health; • efficient use of natural resources; • cohesive and vibrant neighbourhoods; • air quality and air quality management; • sustainable construction; and, • climate change. <p>As you can see the impact which has happened and is happening after the houses which were built in the Stoughton area which is affecting all routers to outer oadby.</p> <p>This points were stated on the Stoughton development but see the impact its having now, so in short words its all talk and writing and nothing has been taking seriously and into consideration and this is always the case.</p>	
Local Resident, 14 th May 2024	OAD/012	<p>Land at East Street Car Park, Oadby (Brooksby Square)</p> <p>Objection</p> <p>I would want to object to the inclusion of Site Option OAD/012 (land at East Street Car Park, Oadby) in this document. There is no need for any further retail development or indeed office development and residential needs can be met elsewhere in the Borough. The East Street car park should remain as a car park to meet the considerable parking needs of surrounding commercial and community uses. I support the fact that the proposed use states that least the same number of existing public car parking spaces have to be retained. However, this requirement in itself would fundamentally affect the viability of any proposals for other</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>uses rendering them non deliverable. It would therefore make sense for this Site Option to be deleted.</p> <p>A similar argument would apply to Site Option OAD/013 (land at Sandhurst Street Car Park, Oadby). This should also be deleted from the document.</p>	
<p>Local Resident, 4th May 2024</p>	<p>OAD/015</p>	<p>Land South of Gartree Road and North of the A6, Oadby</p> <p>Objection</p> <ul style="list-style-type: none"> - Homes are not needed for Oadby, over a 1/5th of the proposed housing is overspill for Leicester - There are plenty of brownfield sites that could be developed instead the green land is proposed to be built on - This will have a devastating affect on biodiversity and build over the last few parts of untouched land within Oadby - Leicester should build on brownfield sites and build upwards - There is no legal requirement for Oadby to take this overspill from Leicester - There are not enough primary school places available to support this level of development at this site with all schools oversubscribed - This will make Florence Wragg Way a through road increasing traffic, noise and disturbance for residents - The overrunning of the planet's natural limits and the unsustainable use of its resources should be considered as one challenge - Human activity must be managed within Earth's natural limits 	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<ul style="list-style-type: none"> - Land is held in trust and managed by human society for its own needs and the needs of other species and future generations; its use should enhance the richness of life - Land management is crucial in securing the protection, regeneration, and restoration of nature 	
Local Resident, 9 th May 2024	OAD/015	<p>Land South of Gartree Road and North of the A6, Oadby</p> <p>Objection</p> <p>I Object on the above planning reference number.</p> <p>The area will have full impact in the area</p> <ul style="list-style-type: none"> • local character (including landscape setting); • safe, connected and efficient streets; • a strong network of green spaces (including parks) and public places; • crime prevention; • high quality architecture; • access, inclusion and health; • efficient use of natural resources; • cohesive and vibrant neighbourhoods; • air quality and air quality management; • sustainable construction; and, • climate change. <p>As you can see the impact which has happened and is happening after the houses which were built in the Stoughton area which is affecting all routers to outer oadby.</p> <p>This points were stated on the Stoughton development but see the impact its having now, so in short words its all talk</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		and writing and nothing has been taking seriously and into consideration and this is always the case.	
Local Resident, 15 th May 2024	OAD/015	<p>Land South of Gartree Road and North of the A6, Oadby</p> <p>Objection</p> <p>I did, eventually find the maps and aerial photographs relating to the sites that have been offered for development. I note that the ones in Oadby, notably, OAD 002; OAD 009; OAD 0010; OAD 0015 constitute a very large proportion of the green wedge between the Borough and the city, which the plan expressly says is very important. I do not think this land should be build on as it provides an essential “green lung” for the local population.</p> <p>The site of Glen Gorse golf course as a development site, if it went ahead, would lose a unique opportunity. This beautiful, landscaped area of land could be linked up with Brockshill country park, thus creating a proper country park, much needed as part of the green infrastructure.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 6 th May 2024	Sites Eats of Oadby resulting in extension to Gorse Lane	<p>Possibly both OAD/006 and OAD/015</p> <p>Objection</p> <p>I object to the proposed extension to Gorse Lane on the grounds that there are a diverse amount of wildlife, hedges and trees living on the Bridle path which will be lost forever, also it has been my understanding that the hedges and trees have a preservation order against them. Surely the easiest and most obvious way through to the proposed development would be to extend Florence Wragg Way.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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Local Resident, 13 th May 2024	Sites Eats of Oadby resulting in extension to Gorse Lane	<p>Possibly both OAD/006 and OAD/015</p> <p>Objection</p> <p>I also note that one aspect of the plan seems to show that Gorse Lane would be extended to provide vehicular access to the proposed development in the fields towards Stretton, if this is correct that would mean existing residential properties having a road build behind them plus the loss of the bridle path (that is though to be originally Saxon/Roman from memory) which is currently restricted to motorised vehicles - the impact to local housing and damage to wildlife by this action cannot be under-estimated as there is many species of birds, deer, badgers, foxes, etc, etc - Am I reading this correctly?</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

Appendix 1 – Wigston Site Options (WIG/001 – WIG/014)

Consultee and Date Received	Specific Policy or Section	Subject and body of comment received	Officer response to comment received
Local Resident, 6 th May 2024	WIG/003	<p>Land North of Denbydale, Wigston</p> <p>Objection</p> <p>Policy 33 by the council does not allow permission to build residence on the green wedge. Building housing here is going against this council's policy, hence, there should be no residential development on this land. Development of house should go out from Wigston green wedge (this area should not be developed in), instead the development should happen in the countryside.</p> <p>Other concern here is the inadequate road network in the area. Lots of sites suggested by landowners for development suggests a loop from cottage farm development to A50 in Wigston, all going through narrow residential, already congested streets rather than direct access of A6. This should not be permitted. Everyone who lives off these roads will be affected. Not just at peak times but traffic pollution will always affect everyone. New development will further congest narrow and busy road network in the area. This will cause residents unduly stress.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 6 th May 2024	WIG/003	<p>Land North of Denbydale, Wigston</p> <p>Objection</p> <p>We are Submitting this form to object to the current site submission for sites "WIG/003, WIG/004, WIG/006, WIG/008, WIG/010", we would like to object on the following grounds:</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification</p>

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<p>Local Resident, 13th May 2024</p>	<p>WIG/003</p>	<p>Land North of Denbydale, Wigston</p> <p>Objection</p> <p>I am objecting to Appendix 1 site options WIG/003 as I do not feel that it is good for the community to have houses built in the green wedge. This should be preserved.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
<p>Local Resident, 12th May 2024</p>	<p>WIG/003</p>	<p>Land North of Denbydale, Wigston</p> <p>Objection</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on</p>

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Local Resident, 6 th May 2024	WIG/003	<p>Land North of Denbydale, Wigston</p> <p>Objection</p> <p>I am writing to support Policy 33 that states that no residential building should be built on green wedge site - OAD/007 is a green wedge that separates the Oadby and Wigston settlement. In addition to this it maintain a Healthy environment, protecting biodiversity, and wildlife corridors. Especially as the green wedge land behind Sutton Close and Tilton Drive links to the environment park. Allows the environmental park to be supported and maintains a Healthy lifestyle for all the species found in the nature park.</p> <p>Similarly, sites - WIG/003, WIG/004, WIG/006, WIG/008, WIG/010 are also green wedge.</p> <p>All these sights should be left alone and out of residential development plans. The residential development should be in the countryside.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 6 th May 2024	WIG/004	<p>Land North of Newton Lane, Wigston</p> <p>Objection</p> <p>I am writing to support Policy 33 that states that no residential building should be built on green wedge site -</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p>

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Local Resident, 15 th May 2024	WIG/006	<p>Land off Denbydale and Rosedale Road, Wigston</p> <p>Objection</p> <p>Preserving the Green Wedges, such as the one stretching between Wigston and Oadby, is crucial for maintaining the natural beauty and ecological balance of the area. These green spaces provide a sanctuary for wildlife, offer opportunities for outdoor recreation, and contribute to the overall well-being of the community. By safeguarding these precious areas, the Council not only ensures a sustainable environment for current residents but also secures a legacy for future generations to enjoy. It is a responsibility that should be taken seriously and with a long-term vision in mind.</p> <p>Wigston and Oadby Borough Council ranks among the country's smallest councils in terms of area. The limitations imposed by its existing boundaries make it challenging to accommodate further development.</p> <p>The preservation of the rural gap between Wigston and Oadby is crucial to maintaining the natural beauty and charm of the area. The Green Wedge serves as a vital green space, offering a respite from urban development and providing a habitat for local vegetation and wildlife. Its scenic charm adds to the unique character of the Borough, offering residents and visitors a place to connect with nature and enjoy the peaceful surroundings.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>By safeguarding the Green Wedge, we not only protect the environment but also uphold the heritage and identity of the region. The open green spaces act as a buffer, preventing urban sprawl and maintaining the distinct separation between communities.</p> <p>Page 74 Policy 17</p> <p>One solution to this issue could be to promote sustainable development practices that prioritise locating new developments closer to principal transport corridors. By strategically placing new sites in convenient locations, we can help alleviate the traffic pressures on minor roads like Newton Lane and minimise the risk of high traffic through rural areas such as Newton Harcourt and Wistow. This approach not only supports road safety but also helps maintain the natural beauty and coherence of the Green Wedge.</p>	
Local Resident, 13 th May 2024	WIG/006	<p>Land off Denbydale and Rosedale Road, Wigston</p> <p>Objection</p> <p>I am objecting to Appendix 1 site options WIG/006 as I do not feel that it is good for the community to have houses built in the green wedge. This should be preserved.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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<p>Local Resident, 13th May 2024</p>	<p>WIG/008</p>	<p>Land at Newton Lane, Wigston</p> <p>Objection</p> <p>I am objecting to Appendix 1 site options WIG/008 as I do not feel that it is good for the community to have houses built in the green wedge. This should be preserved.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification</p>

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<p>Local Resident, 6th May 2024</p>	<p>WIG/008</p>	<p>Land at Newton Lane, Wigston</p> <p>Objection</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been</p>

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		<p>We are Submitting this form to object to the current site submission for sites “WIG/003, WIG/004, WIG/006, WIG/008, WIG/010”, we would like to object on the following grounds:</p> <p>Policy 33 by the council does not allow permission to build residence on the green wedge. Building housing here is going against this council’s policy, hence, there should be no residential development on this land. Development of house should go out from Wigston green wedge (this area should not be developed in), instead the development should happen in the countryside.</p> <p>Other concern here is the inadequate road network in the area. Lots of sites suggested by landowners for development suggests a loop from cottage farm development to A50 in Wigston, all going through narrow residential, already congested streets rather than direct access of A6. This should not be permitted. Everyone who lives off these roads will be affected. Not just at peak times but traffic pollution will always affect everyone. New development will further congest narrow and busy road network in the area. This will cause residents unduly stress.</p> <p>Thank you for taking time to consider our objections.</p>	<p>considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 6 th May 2024	WIG/010	<p>Land North of Glen Gorse Golf Course, Wigston</p> <p>Objection</p> <p>We are Submitting this form to object to the current site submission for sites “WIG/003, WIG/004, WIG/006, WIG/008, WIG/010”, we would like to object on the following grounds:</p> <p>Policy 33 by the council does not allow permission to build residence on the green wedge. Building housing here is going against this council’s policy, hence, there should be no</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish</p>

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		<p>residential development on this land. Development of house should go out from Wigston green wedge (this area should not be developed in), instead the development should happen in the countryside.</p> <p>Other concern here is the inadequate road network in the area. Lots of sites suggested by landowners for development suggests a loop from cottage farm development to A50 in Wigston, all going through narrow residential, already congested streets rather than direct access of A6. This should not be permitted. Everyone who lives off these roads will be affected. Not just at peak times but traffic pollution will always affect everyone. New development will further congest narrow and busy road network in the area. This will cause residents unduly stress.</p> <p>Thank you for taking time to consider our objections.</p>	<p>background evidence to underpin its approach.</p>
<p>Local Resident, 6th May 2024</p>	<p>WIG/010</p>	<p>Land North of Glen Gorse Golf Course, Wigston</p> <p>Objection</p> <p>Policy 33 by the council does not allow permission to build residence on the green wedge. Building housing here is going against this council's policy, hence, there should be no residential development on this land. Development of house should go out from Wigston green wedge (this area should not be developed in), instead the development should happen in the countryside.</p> <p>Other concern here is the inadequate road network in the area. Lots of sites suggested by landowners for development suggests a loop from cottage farm development to A50 in Wigston, all going through narrow residential, already congested streets rather than direct access of A6. This</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>should not be permitted. Everyone who lives off these roads will be affected. Not just at peak times but traffic pollution will always affect everyone. New development will further congest narrow and busy road network in the area. This will cause residents undue stress.</p>	
<p>Local Resident, 13th May 2024</p>	<p>WIG/010</p>	<p>Land North of Glen Gorse Golf Course, Wigston</p> <p>Objection</p> <p>I am objecting to Appendix 1 site options WIG/010 as I do not feel that it is good for the community to have houses built in the green wedge. This should be preserved.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
<p>Local Resident, 6th May 2024</p>	<p>WIG/010</p>	<p>Land North of Glen Gorse Golf Course, Wigston</p> <p>Objection</p> <p>I am writing to support Policy 33 that states that no residential building should be built on green wedge site - OAD/007 is a green wedge that separates the Oadby and Wigston settlement. In addition to this it maintain a Healthy environment, protecting biodiversity, and wildlife corridors. Especially as the green wedge land behind Sutton Close and Tilton Drive links to the environment park. Allows the environmental park to be supported and maintains a Healthy lifestyle for all the species found in the nature park.</p> <p>Similarly, sites - WIG/003, WIG/004, WIG/006, WIG/008, WIG/010 are also green wedge.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>All these sights should be left alone and out of residential development plans. The residential development should be in the countryside.</p>	
<p>Local Resident, 12th May 2024</p>	<p>WIG/011</p>	<p>Land Adjacent to Newton Lane, Wigston</p> <p>Objection</p> <p>These are large sites threatening the coherence of the Green Wedge and adding to the already large developments at Wigston Meadows. This will add to traffic pressures on Newton Lane. There is a particular threat that rat running will occur on the rural roads through Newton Harcourt and Wistow with traffic seeking access to the A6 corridor (in Harborough) This is likely to have road safety implications. It would be preferable if development was located closer to principal transport corridors to reduce the impact on minor roads. There are limited housing site options being considered which in turn limits choice. If the current level of provision is to be pursued the Council could have proposed more options. I would suggest the significant area east of the roundabout north of Kilby Bridge as one potential option. The current size of the district and the constraints of the existing boundaries limits the number of options that can be considered. Radical solutions need to be considered including seeking a change to the district boundary or discussing with Harborough the possibility of additional new sites in their area. I am specifically thinking about sites west of the roundabouts at Great Glenn, or South of Kilby Bridge, accessed from the Husband Bosworth road. Alternatively the Council should declare that it cannot fit a quart into a pint pot and reduce its housing provision. Sustainable development is a key objective. I have not read the Strategic Plan</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

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		<p>documentation. Within the Strategic Plan area I assume most of the new employment sites will be sited close the M1, M69 and north of Leicester, in Charnwood and North West Leicestershire where the transport network is more developed. In that case new housing development needs to be situated close to these sites to reduce the need for long commuter car journeys. In relation to the housing allocation for the Borough is it known where most commuter journeys will be? If most of those journeys are heading to the west or north of Leicester then the proposed housing developments are not in a sustainable location. Arbitrary boundaries should not be an obstacle to good sustainable planning. If in reality the aim of strategic partners is to arbitrarily share the development needs of the strategic area, that is not the right approach to provide sustainable development.</p>	

Appendix 1 – South Wigston Site Option (SWIG/001)

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Appendix 1 – Oadby and Wigston (Cross-Settlement) Site Options (O&W/001 and O&W/002)

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Local Resident, 15 th May 2024	O&W/001	<p>Glen Gorse Golf Course</p> <p>Objection</p> <p>The site of Glen Gorse golf course as a development site, if it went ahead, would lose a unique opportunity. This beautiful, landscaped area of land could be linked up with Brockshill country park, thus creating a proper country park, much needed as part of the green infrastructure.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>
Local Resident, 15 th May 2024	O&W/002	<p>Glen Gorse Golf Course and Highfield Farm</p> <p>Objection</p> <p>The site of Glen Gorse golf course as a development site, if it went ahead, would lose a unique opportunity. This beautiful, landscaped area of land could be linked up with Brockshill country park, thus creating a proper country park, much needed as part of the green infrastructure.</p>	<p>The Council has undertaken considerable work to inform the site selection analysis to inform its decisions on the preferred site allocations. As part of this work, account of all representations submitted on each Site Option, including this one, has been considered.</p> <p>The Council will set out in the Regulation 19 Pre-Submission Draft Plan its rationale and justification for its approach. In addition, the Council will publish background evidence to underpin its approach.</p>

Sustainability Appraisal and Habitat Regulations Assessment

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Local Resident, 14 th May 2024	Appendix C	<p>Sustainability Appraisal, Appendix C</p> <p>Objection</p> <p>The statement in Column 1: SA Objectives, theoretically, indicates intention to protect Green Wedge, Local Green Space, and Countryside from development.</p> <p>The three bullet points in Column 2: SA sub-objectives appear to be a bit more specific. Third bullet point needs to be strengthened, as follows: <i>“Protection and enhancement of nationally and locally designated sites, including Green Wedges and Local Green Spaces.”</i> That then needs following through to amend the third column wording to the same levels of protection for Green Wedges and Local Green Space.</p> <p>The reason this needs changing is that the current Column 3 makes clear that the SA will only consider protection of biodiversity and geodiversity designated sites. There are hardly any such sites in the Borough. So that leaves virtually every green space in the Borough wide open to any SA of proposed sites judging every bit of green space just fine for development.</p> <p>Surely it should be the Borough that decides what level of protection is set for the natural environment in assessing any site proposal? We do have Green Wedges and Local Green Spaces. They are locally designated Sites. At the moment, it looks as if any SA of a proposed site would</p>	Comments have been addressed by LUC in their latest iteration of the SA.

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		<p>simply ignore the designations of Local Green Spaces and Green Wedges.</p> <p>If the Council leaves the current wording, it looks as if an outside consultancy, LUC, sets the criteria for any SA. So why have a Local Plan or policies to protect the natural environment at all?</p>	