

# OADBY AND WIGSTON BOROUGH COUNCIL EMERGING NEW LOCAL PLAN

## Issues and Options (Regulation 18A)

### Statement of Consultation



**March 2023**



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# 1. Introduction

## Purpose of this Document

- 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 new Local Plan Issues and Options (Regulation 18A) documents (and the accompanying Sustainability Appraisal Scoping Report) between midday Friday, 3 September 2021 and midday Friday, 29 October 2021.
- 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 new 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 will continue to inform the preparation of the emerging draft new Local Plan.

## Why is this Document needed?

- 1.4 Paragraph 15 and 16 of the of the National Planning Policy Framework (2021) 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 planmakers 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 2019. 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 new 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.

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

- 1.15 This Statement of Consultation outlines who the Borough Council consulted and how the Regulation 18A Issues and Options (Key Challenges) 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 18B Preferred Options Consultation Draft. This statement is supported by a comprehensive appendix highlighting the comments received at the Regulation 18A Issues and Options (Key Challenges) consultation, as well as the Council's response to those comments received.

## **2. Regulation 18A Issues and Options (Key Challenges) Local Plan Consultation**

Consultation Dates: Friday, 3 September 2021 to Friday, 29 October 2021

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 new 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 New Local Plan preparation process (Regulation 18) was very much focused on identifying the key issues and challenges that may exist within the Borough area over the next Plan period, and how the New Local Plan will respond to these issues and challenges. The New Local Plan Issues and Options consultation was made up of a suite of documents, each looking at a specific topic area:

### **Regulation 18A Issues and Options Topic Areas**

- Part 01. New Local Plan Issues & Options - Introduction and Next Steps
- Part 02. New Local Plan Issues & Options - Overarching Policy Areas
- Part 03. New Local Plan Issues & Options - Strategic Housing
- Part 04. New Local Plan Issues & Options - Employment
- Part 05. New Local Plan Issues & Options - Economy
- Part 06. New Local Plan Issues & Options - Green Infrastructure
- Part 07. New Local Plan Issues & Options - Environment and Sustainability
- Part 08. New Local Plan Issues & Options - Infrastructure
- Part 09. New Local Plan Issues & Options - Local Housing
- Part 10. New Local Plan Issues & Options - Design and Character
- Part 11. New Local Plan Issues & Options - Economy Retail and Leisure
- Part 12. New Local Plan Issues & Options - Health and Wellbeing
- Part 13. New Local Plan Issues & Options - Local Services
- Part 14. New Local Plan Issues & Options - Heritage
- Part 15. New Local Plan Issues & Options - Masterplanning
- New Local Plan SA Scoping Report 03.09.21

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 above.

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 key issues that the Plan should address. Consultation documentation suggested possible content for the Local Plan and stakeholders were invited to express whether these were supported and/or whether there were



any issues that were missing or should be excluded. The Council asked local people, businesses, organisations and statutory consultees to comment.

- 2.5 Each of the topic areas (separated into Topic documents) outlined what the Council considers to be the key issues and challenges that the Borough area is likely to face over the coming years. In addition, a number of potential options for tackling the issues and challenges highlighted are also set out. Further, a number of questions were posed to the reader in each topic area. The issues, challenges, potential options and questions posed, were by no means a definitive list; they were very much an initial highlighting of the Council's considerations and stakeholders were encouraged to submit further suggestions they consider are things or topics that have been missed.
- 2.6 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.
- 2.7 Each Topic document contained key challenges and potential options, set out in clear and distinct topic areas, as well as whether the Council considers the issue or challenge to be of a strategic nature or a non-strategic nature. Each challenge or issue topic area was set out in a consistent manner, and followed the format below:
- **What the government says** – gave a summary of what national government says about the topic area, for example national policy contained within the NPPF and guidance principles set out within the National Planning Practice Guidance (NPPG).
  - **What the Council says** – gave a summary of the Councils thoughts on the topic area.
  - **Potential options** – set out a number of potential options for tackling the issues or challenges that have been highlighted.
  - **Questions** – posed questions to the reader that are pertinent to the potential options posed.

### **Who was invited at this stage and how**

- 2.8 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 New 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) 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 18A Issues and Options Consultation Exhibitions**

Venue	Date
Wigston Leisure Centre, Wigston	Thursday, 16 September 2021, between 12 noon and 3pm.
The Parade, Oadby	Friday, 24 September 2021, between 10am and 1pm.
Blaby Road Park pavilion, South Wigston	Wednesday, 29 September 2021, between 10am and 1pm.
Bell Street, Wigston	Friday, 8 October 2021, between 1pm and 4pm.
Parklands Leisure Centre, Oadby	Tuesday, 12 October 2021, between 10am and 1pm.

South Leicestershire College, South Wigston	Wednesday, 13 October 2021, between 10am and 1pm.
Parklands Leisure Centre, Oadby	Tuesday, 19 October 2021, between 5pm and 8pm

### What were the main issues raised by the consultees?

2.9 Overall, approximately 30 submissions were sent into the Council regarding the Regulation 18A Issues and 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 100 people throughout the exhibitions.

2.10 The key topics and issues that stakeholders commented on in each topic area were:

- **Part 02. Overarching Policy Areas (Strategic Challenges)**
  - The Plan period and cooperation
  - Where should development go?
- **Part 03. Strategic Housing (Strategic Challenges)**
  - Housing need
  - Housing density
  - Affordable housing
  - Gypsy and traveller need
  - Older persons housing
- **Part 04. Employment (Strategic Challenges)**
  - Employment need
  - Identified Employment Areas (new and existing)
- **Part 05. Economy (Strategic Challenges)**
  - Retail hierarchy
  - Retail need
  - Town and district centres and their boundaries
  - Local centres
- **Part 06. Green Infrastructure (Strategic Challenges)**
  - Green infrastructure
  - Green wedges
  - Countryside
  - Sustainable drainage and surface water
  - Flood risk
- **Part 07. Environment and Sustainability (Strategic Challenges)**
  - Habitats and biodiversity
  - Climate change
- **Part 08. Infrastructure (Strategic Challenges)**
  - Highway capacity
  - Highway infrastructure need
  - Sustainable transport

- Developer contributions
- Viability
- High quality communications
- Education
- Walking and cycling infrastructure
- Public transport
- **Part 09. Local Housing (Local Challenges)**
  - First homes
  - Technical housing standards
  - Self and custom build
  - Sustainable homes
  - Housing choices
  - Urban infill
- **Part 10. Design and Character (Local Challenges)**
  - High quality design
  - High quality construction and use of materials
  - Landscape and character
  - Local green spaces
  - Design codes
  - Renewable and low carbon energy production
  - Public realm
  - Shop fronts (including shutters)
- **Part 11. Economy Retail and Leisure (Local Challenges)**
  - Cafes, restaurants etc (night time economy and dwell time)
  - Delivering retail
  - Local impact threshold
  - Primary and secondary frontages
  - Tourism
- **Part 12. Health and Wellbeing (Local Challenges)**
  - Open space, sport and recreation facilities
  - Built leisure facilities
  - Built health facilities
  - Health impact assessments
- **Part 13. Local Services (Local Challenges)**
  - Car parking and electric vehicle car parking
  - Community facilities
  - Cemetery and burial space
- **Part 14. Heritage (Local Challenges)**
  - Conservation areas
  - Listed buildings and locally listed buildings
- **Part 15. Masterplanning (Local Challenges)**
  - Large scale change and place making
- **New Local Plan SA Scoping Report – 3<sup>rd</sup> September 2021**

- 2.11 Appendix A contains a comprehensive set of the representations received during the Regulation 18A Issues and Options Local Plan Public Consultation, together with the Council's Officer responses.

**How will the key issues raised be addressed in the emerging Preferred Options Local Plan Consultation draft?**

- 2.12 As set out in Appendix A, a plethora of representations were received as part of the Regulation 18A Issues and 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 Initial Call for Sites that was undertaken in 2020.
- 2.13 The emerging New 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 new 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.
- 2.14 All sites received to date via the Call for Sites exercises in 2020 and 2021 will also be taken into account accordingly. The Council is currently undertaking evidence gathering at both a strategic and local level and the findings of these studies will inform policies related to growth, including that related to the consideration and assessment of specific sites put forward for new growth opportunities.
- 2.15 The Council would like to thank everyone who has taken the time to read through the Issues and 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 New Local Plan continues to progress.

## Appendix A - Representations received during the Regulation 18A Issues and Options Local Plan Public Consultation 2021 (with Officer Responses)

This Appendix incorporates representations from the following stakeholders (listed alphabetically):

- [Active Together](#)
- [Avison Young – on behalf of Jelson Ltd](#)
- [Barton Willmore \(now Stantec\) on behalf of The Co-operative Group](#)
- [Blaby District Council \(BDC\)](#)
- [Blaby Parish Council](#)
- [CCG - Leicester, Leicestershire and Rutland Clinical Commissioning Groups \(LLR CCG\)](#)
- [DLP Planning Limited on behalf of Bowbridge Land Ltd](#)
- [Environment Agency](#)
- [Forestry Commission](#)
- [Gladman Developments Ltd](#)
- [Harborough District Council \(HDC\)](#)
- [Hinckley and Bosworth Borough Council \(HBBC\)](#)
- [House Builders Federation \(HBF\)](#)
- [Historic England](#)
- [Leicester City Council](#)
- [Leicestershire County Council](#)
- [Leicestershire Police](#)
- [Local Resident\(s\)](#)
- [Mather Jamie Ltd on behalf of Wheatcroft Properties Ltd](#)
- [National Highways](#)
- [Natural England](#)
- [NHS Property Services Ltd](#)
- [Pegasus Group on behalf of David Wilson Homes](#)
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- [Severn Trent](#)
- [Westernrange Limited and Jelson Homes Limited](#)
- [Wigston Civic Society](#)
- [Zeph's Café, Oadby](#)

**Appendix A: Representations received during the Regulation 18A Issues and Options Local Plan Public Consultation 2021 (with Officer Responses)**

Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Active Together	30 <sup>th</sup> September 2021	<p><b>General physical activity considerations and comments</b></p> <p>The following identifies general considerations relating to physical activity and the development of the Oadby and Wigston Local Plan.</p>	<p>Noted.</p> <p>The Council would like to thank Active Together for taking time to read through the consultation document and for responding to the consultation.</p>
Active Together	30 <sup>th</sup> September 2021	<p><b>Location of development:</b></p> <p>There is increasing focus on the development of walkable communities, 20-minute neighbourhoods etc., which would appear to provide opportunity to reduce dependence on private vehicles – providing an opportunity for more sustainable travel, and as a result increase physical activity, health and wellbeing. This can result in a knock-on effect on other areas such as the environment and economy. The TCPA have articulated this potential in its publication on <a href="#">20-minute neighbourhoods</a>.</p> <p>Approaches such as this would seem to support the economic, social and environmental objectives of planning and could result in a positive impact on levels of physical activity. We would support any opportunities to embrace such approaches and outcomes across Oadby &amp; Wigston.</p> <p>Housing density can have an impact upon people’s physical activity levels. Higher density development can support the development of walkable communities; however, it is crucial that this doesn’t result in reduced access to formal and informal open space or other opportunities to be active. A</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, Policy and Guidance.</p> <p>The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take place.</p> <p>The specific recommendations will be taken into consideration as the preparation of the emerging new Local Plan document continues to progress.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p>balance should therefore be struck which allows for the development needed, while ensuring that design and quality of development maximises opportunities for people to be active – which includes creation of high-quality, safe spaces for people to engage in formal and informal recreation, active travel, play, social engagement etc.</p>	
Active Together	30 <sup>th</sup> September 2021	<p><b>Local Health Inequalities, Obesity and Physical Activity</b></p> <p>A significant health inequalities gap is present across Oadby &amp; Wigston (<a href="#">further information</a>). Considering this challenge, health and wellbeing must be given significant strength within the local plan in order for any development to be considered sustainable. In doing so, the council will be well positioned to ensure the local plan makes a positive difference to people’s lives as stated in paragraph 1.9. and as required by the social objective of planning.</p> <p>The percentage of adults classified as overweight or obese for Oadby and Wigston in 2019/20 is 56.4%. Whilst better than the England value of 62.8%, this remains over half of the local population (<a href="#">Oadby &amp; Wigston District Health Profile, 2021</a>).</p> <p>The percentage of physically active adults for Oadby and Wigston in 2019/20 is 52.9%. This is the lowest figure of all Leicestershire local authority areas and significantly lower than the England value of 61.4% (Sport England Active Lives Data).</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, Policy and Guidance.</p> <p>The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan, including Public Health, to ensure that the creating healthy communities is embedded within the new Local Plan.</p> <p>The specific recommendations will be taken into consideration as the preparation of the emerging new Local Plan document continues to progress.</p>



**Appendix A: Representations received during the Regulation 18A Issues and Options Local Plan Public Consultation 2021 (with Officer Responses)**

Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p>The following rows articulate several opportunities to maximise physical activity levels, which in turn may contribute toward local health improvement and decreasing (or avoiding increasing) levels of excess weight or obesity.</p>	
Active Together	30 <sup>th</sup> September 2021	<p><b>Active Travel</b></p> <p>The percentage of adults cycling for travel at least three days per week for Oadby and Wigston in 2018/19 was 2.0%, compared to the England value of 3.1% (<a href="#">Oadby &amp; Wigston District Health Profile, 2021</a>).</p> <p>Connecting homes, workplaces, educational settings and leisure/recreational places with good quality, safe, direct, well-lit, active travel infrastructure with good natural surveillance – including appropriate supporting infrastructure (such as cycle storage in all of these locations, quality wayfinding/signposting) – could improve rates of cycling in the borough and contribute to improvements on health and physical activity levels.</p> <p>Prioritisation of active forms of travel (i.e., walking, cycling, scooting) to encourage mode shift carries the potential to improve health, provide environmental and air quality benefits, reduce congestion etc. should be a factor in the development of the local plan – providing appropriate policies and guidance to maximise the potential benefits of active travel.</p>	<p>Noted, the Council will look to strengthen the Local Plan in terms of enabling active travel and design.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, Policy and Guidance.</p> <p>The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take place.</p> <p>The specific recommendations will be taken into consideration as the preparation of the emerging new Local Plan document continues to progress.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		In addition, development of 'walkable communities' – providing places to live, work, learn and play within reasonable walkable distance will make active forms of travel a more attractive and realistic proposition.	
Active Together	30 <sup>th</sup> September 2021	<p><b>Formal Sport and Recreation:</b></p> <p>Growth should provide (or where appropriate, contribute toward) appropriate sport and recreational facilities, as per locally identified needs (such as playing pitch strategies, built facilities strategies etc.), to ensure residents of new development can be accommodated either on site or via proportionate contribution to appropriate off-site provision.</p>	<p>Noted, the Council will undertake a review of the current Open Space Local Plan policy to and update its current evidence to ensure that the right types and amount of open</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, Policy and Guidance.</p> <p>The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take place.</p> <p>The specific recommendations will be taken into consideration as the preparation of the emerging new Local Plan document continues to progress.</p>
Active Together	30 <sup>th</sup> September 2021	<p><b>Informal Play:</b></p> <p>Efforts should be made to ensure the designs of homes, neighbourhoods and public spaces provide safe places to play – including but not limited to formal play/park provision, creating a playable environment for children and young people. Opportunities to enable physical activity should not be</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, Policy and Guidance.</p> <p>The Council will seek to engage and work in</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		solely limited to formal provision, which misses the opportunity to encourage doorstep play.	<p>partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take place.</p> <p>The specific recommendations will be taken into consideration as the preparation of the emerging new Local Plan document continues to progress.</p>
Active Together	30 <sup>th</sup> September 2021	<p><b>Access to Open Spaces:</b></p> <p>Open spaces support the health and wellbeing of communities but must be appropriately located and designed to maximise use. Such spaces should be in a prominent position and provide spaces to accommodate and encourage use across a life course and for a range of uses, with community consultation encouraged to maximise the impact.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, Policy and Guidance.</p> <p>The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take place.</p> <p>The specific recommendations will be taken into consideration as the preparation of the emerging new Local Plan document continues to progress.</p>
Active Together	30 <sup>th</sup> September 2021	<p><b>Healthy Place Making Platform:</b></p> <p>The locally-developed <a href="#">Healthy Place Making</a> platform has been developed to provide a resource for planners, developers and other interested parties to find information on how to create healthier places, along with the opportunity to create bespoke project boards to help influence place making. Use of</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, Policy and Guidance.</p> <p>The Council will seek to engage and work in</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p>this (and other appropriate resources and tools) should be encouraged to assist in the development of places that consider health and wellbeing at the forefront of design and function.</p>	<p>partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take place.</p> <p>The specific recommendations, in particular the '<i>Health Place Making</i>' platform, will be taken into consideration as the preparation of the emerging new Local Plan document continues to progress.</p>
Active Together	30 <sup>th</sup> September 2021	<p><b>Health and Wellbeing:</b></p> <p>This section of the draft local plan identifying the four key areas of Open space, sport and recreation, built leisure facilities, Built health facilities, Health impact assessments. It should also be recognised within this section that a variety of other design elements, natural and built infrastructure etc. that have a significant impact upon health and wellbeing (i.e., design of homes, streets, workplaces, schools, public spaces).</p> <p>Active Together, in partnership with public health, planning and other colleagues across Leicestershire, Leicester and Rutland have developed an online toolkit to support and promote health within new developments (<a href="http://www.healthyplacemaking.co.uk">www.healthyplacemaking.co.uk</a>). This provides a database/toolkit of design guidance, evidence base, best practice and other resources that promote and support the development of health within placemaking across a range of themes. Opportunities to encourage use of this (and other best practice such as Sport England's Active Design, building for a Healthy Life etc.) in the design of new developments is</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, Policy and Guidance.</p> <p>The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take place.</p> <p>The specific recommendations, in particular the '<i>Health Place Making</i>' platform, will be taken into consideration as the preparation of the emerging new Local Plan document continues to progress.</p>

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		encouraged to deliver greater health and wellbeing outcomes for residents.	
Active Together	30 <sup>th</sup> September 2021	<p><b>Direct Responses to Local Plan Questions</b></p> <p>The following considers the questions raised within the local plan consultation documents, considering those which may have a bearing on physical activity outcomes for residents across the borough.</p>	Noted.
Active Together	30 <sup>th</sup> September 2021	<p><b>Green infrastructure:</b></p> <p><b><i>Do you think that the Council should maintain the current Local Plan policy position relating to Green Infrastructure, in the new Local Plan, with minor wording amendments to ensure that it is up-to-date with current national planning policy and guidance?</i></b></p> <p>Policy 8 states new development should contribute towards the creation of new, multi-functional green space, but could strengthen the focus on creating space which contributes to health and wellbeing (benefits of green space highlighted earlier in the chapter).</p> <p>Reference to ensuring the position of green space is prominent within development (visually accessible space in prime location to encourage use by proximity to residences and other facilities/services) may help in maximising the benefits of these spaces and avoid development which locates green space at the edges, out of sight and failing to secure the</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, Policy and Guidance.</p> <p>The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take place.</p> <p>The specific recommendations will be taken into consideration as the preparation of the emerging new Local Plan document continues to progress.</p>

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		potential benefits around sustainable movement, and physical activity across the life course.	
Active Together	30 <sup>th</sup> September 2021	<p><b>Open space, sport &amp; recreation:</b></p> <p><b><i>Should the Council 'roll forward' the current policy approach set out in current Local Plan Policy 9 – Open Space, Sport and Recreation Facilities, ensuring that it is up to date with current national planning policy and guidance?</i></b></p> <p><b><i>Do you consider that there are more appropriate options relating to the delivery of open space, sport and recreation facilities in relation to new development?</i></b></p> <p>Recognition within the local plan chapter around benefits to public health, well-being and quality of life are a positive within the existing local plan. The coronavirus pandemic has highlighted this even more, with increased use of many open spaces throughout the country. This should therefore be maintained, and where possible further strengthened / emphasised, within the new Local Plan.</p> <p>Use of the Playing Pitch Strategy is referenced with respect to quantity requirement for outdoor sports space. This is welcome considering the quality work undertaken by Oadby &amp; Wigston Borough Council in creating the Playing Pitch Strategy recently.</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p>

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		<p>Policy 9 sets out several requirements for open space, sport and recreational facilities which are welcome, however these 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 – providing high quality multi-functional spaces.</p>	
Active Together	30 <sup>th</sup> September 2021	<p><b>Built leisure facilities:</b></p> <p><b><i>Should the Council draft a new Policy to address Built Leisure Facilities needs in the Borough, taking account of up to date national planning policy and guidance, as well as local evidence?</i></b></p> <p><b><i>Should the Council only apply the Policy principles and guidance set at a national level?</i></b></p> <p>The policy includes reference to the Playing Pitch strategy to support identification of need for pitches, but a similar assessment for sports facilities is not present for the borough. Such assessment would be valuable in helping to identify needs and shortfalls, including demand associated with new development. We would recommend such strategy is undertaken to enable reference to be included within the Local Plan and to help inform future priorities in relation to built sports facilities.</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p>

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Active Together	30 <sup>th</sup> September 2021	<p><b>Built health facilities:</b></p> <p><b><i>Should the Council ‘roll forward’ the current policy approach set out in Local Plan Policy 46 – Infrastructure and Developer Contributions?</i></b></p> <p><b><i>Should the Council draft a new Policy to address Built Health Facility needs in the Borough?</i></b></p> <p><b><i>Should the Council only apply the Policy principles and guidance set at a national level?</i></b></p> <p>There are examples nationally of built health facilities being co-located with physical activity provision (such as leisure centres, open spaces etc.) to allow for greater connection between health and physical activity. It would be welcome to see exploration of this in new developments encouraged (subject to appropriate evidence bases and consultation / agreement with the relevant health authorities) to explore how the borough could examine the potential benefits of co-location. This could simplify the opportunity to promote and deliver increasingly active lifestyles to deliver greater health outcomes.</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p> <p>The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take place.</p>
Active Together	30 <sup>th</sup> September 2021	<p><b>Health impact assessments:</b></p> <p><b><i>Should the Council ‘roll forward’ the current Local Plan policy relating to Health Impact Assessments (Policy 5) with wording amendments where necessary?</i></b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, Policy and Guidance.</p>



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		<p><b><i>Should the Council remove the policy approach and only apply the policy principles and guidance set at a national level through the National Planning Policy Framework and the National Planning Practice Guidance?</i></b></p> <p>The National Planning Policy Framework recognises Healthy Impact Assessments (HIA) as useful in assessing health needs and impacts, and therefore use of such assessment – and continuation of current policy – is welcome. It’s important that there is clarity in why actions have been taken and how development location, design, function etc. are expected to impact upon health.</p> <p>Included within the aforementioned <a href="http://www.healthyplacemaking.co.uk">www.healthyplacemaking.co.uk</a>, is a locally-developed online Health Impact Assessment tool, produced by Active Together - in partnership with Leicestershire and Leicester public health teams and local authorities across Leicestershire and Leicester - which allows for pro-active consideration of the health impact of new development. An additional benefit is that this will be open to ongoing review and development based on best practice and will sit on the platform alongside a library of materials and guidance exploring how to create healthier places. Reference to the platform, and opportunity for the HIA tool specifically to be used to achieve the requirement set out in Policy 5, is encouraged to ensure high quality and comprehensive HIAs are developed.</p>	<p>The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take place.</p> <p>The specific recommendations will be taken into consideration as the preparation of the emerging new Local Plan document continues to progress.</p>

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<p>Avison Young – on behalf of Jelson Ltd</p>	<p>29<sup>th</sup> October 2021</p>	<p><b>1. Introduction</b></p> <p>1.1 Avison Young is instructed by Jelson Ltd ('Jelson') to prepare representations to the Regulation 18 Issues and Options consultation document published by Oadby and Wigston Borough Council in respect of its New Local Plan. Specifically, Jelson wishes to make representations in respect of land that it owns at Newton Lane, Wigston.</p> <p>1.2 The Council adopted its current Local Plan in 2019. It has now begun the process of preparing its 'New Local Plan'. It carried out a Call for Sites in 2020 (see below). The current consultation seeks views on 'Issues and Options' for the new plan to tackle. We understand from the Council's Local Development Scheme that a 'draft Local Plan' will be published in May / June 2022, and a 'Pre-Submission' version will follow in May / June 2023. Examination of the Plan is forecast for August 2023, with adoption to follow in December of that year. Accordingly, the current consultation represents an early stage in the process of preparing the New Local Plan.</p> <p>1.3 The consultation is structured around a series of topic papers, which each pose a series of questions. Jelson does not comment on all of those, but instead focusses on issues of strategic housing and environmental matters (which are both relevant to the land that it is promoting for development).</p> <p>1.4 The Council is also consulting on a Sustainability Appraisal Scoping Report. We have reviewed this and provide our representations on behalf of Jelson in this document.</p> <p>1.5 Finally, we note that the Council is undertaking a further Call for Sites. With Jelson having already made submissions to the previous call in 2020, it has not made a submission to the current process.</p>	<p>Noted.</p> <p>The Council would like to thank Avison Young for taking time to read through the consultation document and for responding to the consultation on behalf of Jelson Ltd.</p>
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		<p>1.6 Jelson made three submissions to the Council's Call for Sites in 2020 in relation to its interests at Newton Lane, which can be categorised as follows.</p> <p>i) The entirety of Jelson's land at Newton Lane, which extends to circa 40.6 hectares and has capacity for approximately 1,000 to 1,300 dwellings – the Council has ascribed this reference number WIG/004.</p> <p>ii) A discrete part of Jelson's land at Newton Lane, referred to as 'Land North of Denbydale', which extends to circa 2.3 hectares and has capacity for approximately 50 to 60 dwellings – the Council has ascribed this reference number WIG/003.</p> <p>iii) A further discrete part of Jelson's land at Newton Lane, which incorporates WIG/003 and a parcel to the north of it. This site is referred to as 'Land off Denbydale and Rosedale Road', extends to circa 8.3 hectares and has capacity for approximately 150 to 155 dwellings – the Council has ascribed this site reference number WIG/006.</p> <p>1.7 These representations are made in respect of WIG/003, WIG/004 and WIG/006 collectively. Please note that Westernrange Ltd has an interest in land adjoining WIG/004. Westernrange has also submitted representations to the Council, jointly with Jelson, and these promote the development of a conjoined site comprising of WIG/004 and the Westernrange Lane. Those representations are supported by Jelson.</p>	

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		<p>1.8 With these introductory points in mind, the remainder of these representations is structured as follows.</p> <ul style="list-style-type: none"> <li>• Section 2 describes the land that Jelson is promoting for development.</li> <li>• Section 3 sets out our representations in respect of strategic plan-making matters (and in particular those relating to housing need, supply and delivery).</li> <li>• Section 4 sets out our representations in respect of matters relating to Green Wedges.</li> <li>• Section 5 sets out our representations on a handful of other matters raised by the Council.</li> <li>• Section 6 comments briefly on the Council’s Sustainability</li> </ul> <p>1.9 It is important to note that where Jelson does not comment on a specific question, that is because it currently has no specific observations to make. Jelson does, though, reserve the right to comment on matters not raised in this document during subsequent consultations, as the Council’s evidence base evolves, and draft policies begin to emerge.</p>	
Avison Young – on behalf of Jelson Ltd	29 <sup>th</sup> October 2021	<p><b>Jelson’s Land at Newton Lane</b></p> <p><b>Site Description</b></p> <p>2.1 Jelson, is promoting the allocation of land to the south-east of Wigston for residential development in the New Local Plan. As noted in Section 1, it has made three submissions to the Council’s Call for Sites illustrating the different scale of development that may be achievable on its land, and the</p>	<p>Noted.</p> <p>All sites received to date via the Call for Sites process in 2020 and 2021 will be taken into account accordingly.</p> <p>The Council are currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will</p>

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		<p>Council has assigned reference numbers to each of those permutations. For the purposes of this commentary, we take 'the site' to be the full extent of Jelson's ownership (i.e. WIG/004).</p> <p>2.2 The site comprises agricultural land. There are groups of mature trees and hedges along its boundaries of the site, and a handful of trees planted within it, but otherwise it is 'open'. The site gently slopes from west to east. A single public right of way bisects the site from west to east.</p> <p>2.3 The proposed allocation site is bounded on its northern and north-western sides by agricultural land, beyond which lie, to the north, Brocks Hill Country Park, and to the north-west, by the urban edge of Oadby. To the east of the site is agricultural land and countryside. The southern boundary is formed by Newton Lane, beyond which is new residential development ('Wigston Meadows') delivered by David Wilson Homes.</p> <p>2.4 The site is bounded on its western side largely by the rear gardens of residential properties and the built-up area of Wigston. Accordingly, we conclude that the site is well-related to the urban area.</p>	<p>inform policies related to housing, including that related to the consideration and assessment of specific sites put forward for new growth opportunities.</p>
Avison Young – on behalf of Jelson Ltd	29 <sup>th</sup> October 2021	<p><b>Flood Risk</b></p> <p>2.5 Flood Maps published by Government indicate that the site is entirely within Flood Zone 1, and so is at low risk of flooding.</p>	Noted.

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		Furthermore, the maps indicate that the site is not located close to any areas of greater flood risk.	
Avison Young – on behalf of Jelson Ltd	29 <sup>th</sup> October 2021	<p><b>Listed Buildings and Other Heritage Assets</b></p> <p>2.6 A review of Historic England’s records indicates that there are no statutorily listed buildings, or other designated heritage assets, on the site, or in close proximity to it.</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to heritage.</p>
Avison Young – on behalf of Jelson Ltd	29 <sup>th</sup> October 2021	<p><b>Transport and Highways</b></p> <p>2.7 Newton Lane connects to Welford Road some 1 kilometre to the west of the site. Welford Road provides a direct vehicular route to Wigston town centre (located circa 1.2 kilometres from the site) and Leicester City Centre (located circa 6.5 kilometres to the north) (measurements taken from the mid-point of the proposed allocation site).</p> <p>2.8 There is a bus stop approximately 430 metres from the southern boundary of the site, located on Guthlaxton Way, which is accessed from Newton Lane. There are also a number of bus stops on Meadow Way, approximately 120 metres from the western boundary of the site.</p> <p>2.9 The nearest railway station to the site is South Wigston station, approximately 4.2 kilometres to the west of the site. South Wigston is served by a route which provides access to the principal centres of</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery and highways.</p>

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		<p>Leicester and Birmingham (which provide connections to, inter alia, London, Derby, Nottingham and Cambridge), in addition to local rail stations in Leicestershire.</p> <p>2.10 We conclude on this basis that there is generally a good level of accessibility to public transport in Wigston.</p>	
Avison Young – on behalf of Jelson Ltd	29 <sup>th</sup> October 2021	<p><b>Local Facilities</b></p> <p>2.11 There are a number of shops and facilities located in Wigston town centre, including convenience stores operated by Sainsbury’s, Aldi, Iceland and Farmfoods, and a range of service sector uses.</p> <p>2.12 Leicester City Centre, as the principal centre in the County, comprises a comprehensive range of convenience and comparison shopping facilities, as well as healthcare facilities and employment opportunities.</p>	Noted.
Avison Young – on behalf of Jelson Ltd	29 <sup>th</sup> October 2021	<p><b>Education Facilities</b></p> <p>2.13 The nearest primary school to the site is Glenmere Community Primary School, which is located circa 0.8 kilometres from the site (measured from the centre). The Meadows Community Primary School, which is located circa 0.9 kilometres from the site, and All Saints Primary School, circa 1.6 kilometres from the site, provides additional primary education provision. The nearest secondary school is Gartree High School, which is located circa 0.9 kilometres from the site. There is further provision at Wigston Academy, circa 2</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to education.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take</p>

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		kilometres from the site. On this basis, we conclude that there is available access to both primary and secondary education facilities in Wigston.	shape.
Avison Young – on behalf of Jelson Ltd	29 <sup>th</sup> October 2021	<p><b>Current Policy Designations</b></p> <p>2.14 The western part of the site is located within the Oadby and Wigston Green Wedge, which is, principally, intended to maintain separation between the two aforementioned towns. The remainder of the site is located in the countryside.</p>	<p>Noted.</p> <p>The Council will review all existing designations, including Green Wedges, as part of the emerging Local Plan.</p>
Avison Young – on behalf of Jelson Ltd	29 <sup>th</sup> October 2021	<p><b>Proposed Allocation</b></p> <p>2.15 Jelson proposes the allocation of its land for residential development. In due course, it will wish to test with the Council the merits of each of WIG/003, WIG/004 and WIG/006 and the contribution that they can make to meeting housing need in the Borough.</p>	<p>Noted.</p> <p>All sites received to date via the Call for Sites process in 2020 and 2021 will be taken into account accordingly.</p> <p>The Council are currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing, including that related to the consideration and assessment of specific sites put forward for new growth opportunities.</p> <p>As part of this work, the Council has already and will continue to seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions will continue to take shape.</p>



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Avison Young – on behalf of Jelson Ltd	29 <sup>th</sup> October 2021	<p><b>3. Representations on Strategic Matters (Over-Arching Policy Areas and Housing)</b></p> <p>3.1 We begin by providing some general commentary on strategic housing matters that are relevant to plan-making in Leicestershire. Having done so, we then turn to provide Jelson’s responses to the questions posed by the Council in the ‘Overarching Policy Areas’ and ‘Housing (Strategic Challenges)’ documents. We take these matters together because of the inter-relationship between the two.</p>	Noted.
Avison Young – on behalf of Jelson Ltd	29 <sup>th</sup> October 2021	<p><b>General Commentary on Strategic Matters</b></p> <p>3.2 In February 2017 Leicester City Council declared that it was unlikely to be able to meet its objectively- assessed housing needs. However, it did not quantify the scale of that unmet need. At the time that Oadby and Wigston’s current Local Plan was examined in April 2018, the unmet arising from Leicester was still to be declared.</p> <p>3.3 In the context of that, the current OWBC Local Plan does not make any contribution towards unmet needs arising in the housing market area (HMA). Policy 47 of the adopted Plan does, though, set out the circumstances in which the Council will review its Plan.</p> <p>3.4 The first is a commitment to commence a review of the Plan no later than five years from the date of adoption, in</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, Policy and Guidance.</p> <p>The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take place.</p> <p>The specific recommendations will be taken into consideration as the preparation of the emerging new Local Plan document continues to progress.</p>

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		<p>accordance with the requirements of the National Planning Policy Framework (NPPF). The second is where there are “significant and persistent shortfalls in the delivery of housing, employment, other development, and / or infrastructure”. The third is where another authority in the Leicester and Leicestershire Housing Market Area declares an evidenced unmet need, and cooperation between authorities in the HMA concludes that OWBC should accommodate some of that unmet need.</p> <p>3.5 Since the adoption of the current Local Plan, there have been two significant changes in Government policy relating to the calculation of housing need. The first is the introduction of the ‘standard methodology’ for calculating local housing need (LHN), via changes made to the NPPF and Planning Practice Guidance (PPG) in 2018 (after the examination of the current Plan). The second is the amendment that Government made to the standard methodology in December 2020, which introduced the ‘Cities and Urban Centres Uplift’; this obliges a closed list of urban authorities to apply an uplift of 35% to their LHN. Leicester is currently included on that list and so the uplift applies to its calculations of LHN.</p> <p>3.6 In September 2020 Leicester City Council carried out consultation on a ‘Draft (Regulation 18) Local Plan’, which concluded that it had an unmet need of 7,742 dwellings in the period up to 2036. However, that pre-dated the introduction of the cities and urban centres uplift, we understand that the unmet need arising in Leicester is now in excess of 16,500 dwellings.</p>	

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		<p>3.7 The NPPF was most recently updated in July 2021. Like previous versions, it retains the ‘presumption in favour of sustainable development’, although the wording of it has been amended. The 2021 NPPF sets out the ‘presumption’ at Paragraph 11, and says, in relation to plan-making that, (inter alia), “strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:</p> <p>i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or</p> <p>ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”.</p> <p>3.8 Footnotes to Paragraph 11 confirm firstly that unmet needs should be confirmed through statements of common ground, and secondly that the policies referred to in i) comprises of a specific, closed list.</p> <p>3.9 The emphasis on accommodating unmet needs also carries through to the tests of soundness that all development plans need to meet, and which are found at Paragraph 35 of the NPPF. We do not need to repeat the tests in full, but we do note that in order for a plan to be positively prepared, it must,</p>	

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		<p>“as a minimum”, seek 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>3.10 Section 5 of the NPPF addresses itself to the delivery of new homes. It confirms that Government’s objective is “significantly boosting the supply of homes”. Paragraph 61 states that strategic planning policies,</p> <p>“should be informed by a local housing need assessment, conducted using the standard method... unless exceptional circumstances justify an alternative approach, which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring authorities should also be taken into account in establishing the amount of housing to be planned for.” (Our emphasis)</p> <p>3.11 It is with these general points in mind that Jelson notes the Council’s commentary in paragraphs 4.3 to 4.9 of the housing topic paper, which, in summary, say:</p> <ul style="list-style-type: none"> <li>• that the standard method generates a need of 180 dwellings per annum (dpa) for Oadby and Wigston;</li> <li>• that the LHN represents a 22% increase over the need figure in the adopted Plan (148 dpa);</li> <li>• that the Council “has consistent struggles to meet its housing requirement in full”; and</li> </ul>	

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		<p>• that “due to the nature of the Borough area, it is not expected that any of Leicester City’s unmet need could be provided within the Borough area, however this has yet to be determined”.</p> <p>3.12 The Council uses those points to generate three ‘options’ for the Plan, which are:</p> <ul style="list-style-type: none"> <li>• continue to rely on a need figure of 148 dpa; or</li> <li>• prepare the new plan using the LHN of 180 dpa; or</li> <li>• use the outputs of a housing and economic needs assessment (HENA) before selecting a need figure to base the plan on.</li> </ul> <p>3.13 In a similar vein, the Council’s ‘Overarching Policy Areas’ topic paper concludes that the Borough “compact and highly urbanised” and that this means that there is only a finite amount of urban land available for redevelopment, so that there is almost certainly a need for future growth to be accommodated on greenfield sites. The paper goes on to say that “the Council considers that the Local Plans should identify a mix of sites for development, rather than ‘putting all its eggs in one basket’”.</p> <p>3.14 This then leads the Council to present three broad options for the distribution of growth across the Borough in the new plan. These are reproduced as follows.</p> <ul style="list-style-type: none"> <li>• “Concentrate new development within the existing urban areas, particularly the town and district</li> </ul>	

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		<p>centres, until such land has been fully utilised, only then will greenfield land be used for development.</p> <ul style="list-style-type: none"> <li>• Focus new development towards the greenfield areas of the Borough only, for example many of which that have been put forward for consideration to the Council and are included in the 'Call for Sites: Site Collation and Initial Assessment'.</li> <li>• Take a balanced approach to the location of new development with a mix of urban development and greenfield land development."</li> </ul>	
Avison Young – on behalf of Jelson Ltd	29 <sup>th</sup> October 2021	<p><b>Jelson’s Responses to the Council’s Questions</b></p> <p>3.15 Having regard to the general commentary given above, Jelson responds to the specific questions posed by the Council in the following way.</p>	Noted.
Avison Young – on behalf of Jelson Ltd	29 <sup>th</sup> October 2021	<p><b>Over-arching Policy Areas</b></p> <p><i>Is the suggested Local Plan time period of ‘date of adoption to the year 2041’ appropriate?</i></p> <p>3.16 Paragraph 22 of the NPPF says that “Strategic policies should look ahead over a minimum 15 year period from adoption”. The Council’s current LDS anticipates that the Plan will be adopted in December 2023. If that were the case, then a plan period to 2041 would mean the Plan would span 18 years. This would be consistent with Paragraph 22.</p>	Noted.

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		<p>3.17 Jelson’s only observation therefore is that, if there is any significant delay to the preparation of the Plan, which gives rise to a likelihood of adoption taking place much later than 2023, then the Council should give consideration at that point to extending the proposed plan period.</p>	
<p>Avison Young – on behalf of Jelson Ltd</p>	<p>29<sup>th</sup> October 2021</p>	<p><b><i>Which of the proposed options illustrated above should be used in determining the location of new development within the Borough area?</i></b></p> <p>3.18 The options are those that we have set out in Paragraph 3.14 above. Jelson recognises that the NPPF encourages strategic policies to make use of brownfield land when seeking to accommodate housing need (Paragraph 119), but the Council itself acknowledges that the ‘compact’ nature of the Borough means there is only a finite amount of urban land available, and that greenfield development is required to contribute to new growth in the Borough. Indeed, when preparing its Core Strategy (2010) and the current Local Plan (2019), it was necessary for the Council to make large-scale allocations (or ‘Directions for Growth’, as they have been known), on greenfield sites in both Oadby and Wigston.</p> <p>3.19 Given that the LHN for the Borough, calculated using the standard method, is 180 dpa (and which the Council itself notes represents a step-up from the current adopted target of 148 dpa), then Jelson concludes that, for the Council to meet its LHN, it will need to continue to direct a significant proportion of growth to suitable greenfield sites.</p>	<p>Noted.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council’s Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>The Council will also undertake evidence gathering in terms of infrastructure and transport at a strategic and local level and the findings of these studies (and all evidence base) will inform policies related to housing and new development, including that related to the consideration and assessment of specific sites put forward for new growth opportunities.</p> <p>As part of this work, the Council has already begun and will continue to regularly engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions will continue to take shape.</p>

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		<p>3.20 To that end, Jelson’s land is free from constraints and is owned by a willing developer. It is in a sustainable location and plainly suitable for residential development. As Jelson noted in its submissions to the 2020 Call for Sites, its land (in whichever configuration) is likely to be able to begin delivering dwellings within five years, thereby assisting the Council in providing the housing that will be required by the new Plan.</p>	<p>For example, 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.</p> <p>The Local Plan will consider a variety of sites by size and location to determine the best options for delivering the Borough’s housing requirement.</p> <p>All sites received to date via the Call for Sites process in 2020 and 2021 will be taken into account accordingly.</p>
<p>Avison Young – on behalf of Jelson Ltd</p>	<p>29<sup>th</sup> October 2021</p>	<p><b>Housing</b></p> <p><b><i>Is there any robust evidence to suggest that the Council should continue to use the current housing requirement of 148 new homes per year?</i></b></p> <p>3.21 The NPPF is clear that the standard method should be used to calculate housing need and that a variation should only be pursued in ‘exceptional circumstances’. That clearly sets a high bar. The Council has alluded to pressures on the supply of land for housing, but has not yet carried out any assessment of capacity to examine how much land is available to accommodate new housing. No exceptional circumstances have been demonstrated to justify a departure from the LHN figure of 180 dpa.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, Policy and Guidance.</p> <p>The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take place.</p> <p>The specific recommendations will be taken into consideration as the preparation of the emerging new Local Plan document continues to progress.</p>



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Avison Young – on behalf of Jelson Ltd	29 <sup>th</sup> October 2021	<p><b><i>Should the Council use the housing need figure of 180 homes per year calculated using the standard method?</i></b></p> <p>3.22 Yes, because Paragraph 61 of the NPPF makes clear that the expectation is that LHN, calculated using the standard method, will provide the basis for setting a housing target in a development plan (with unmet needs arising elsewhere to then be factored in). Similarly, Paragraph 11 of the NPPF directs that development plans should meet objectively-assessed needs “as a minimum” in order to be sound. The criteria for doing anything other than that require either (i) specific policies in the NPPF to provide a “strong reason” or (ii) for adverse impacts to outweigh benefits in a way that is both significant and demonstrable. The thrust of the NPPF is clearly directed towards use of the standard method.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will also inform policies related to housing.</p>
Avison Young – on behalf of Jelson Ltd	29 <sup>th</sup> October 2021	<p><b><i>What should the Council do if the HENA outcomes suggest that there should be a diversion from the standard method?</i></b></p> <p>3.23 Jelson reserves its view on this until such time that the HENA has been published and its conclusions are understood. Nevertheless, we note that the NPPF establishes that the test for departing from the standard method is the demonstration of exceptional circumstances.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and</p>

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			<p>local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Avison Young – on behalf of Jelson Ltd	29 <sup>th</sup> October 2021	<p><b><i>What do you consider is the evidenced housing need for the Borough area?</i></b></p> <p>3.24 The most up-to-date assessment of need is the LHN calculation of 180 dpa. As above, no other evidence currently exists to indicate a departure from this.</p>	Noted.
Avison Young – on behalf of Jelson Ltd	29 <sup>th</sup> October 2021	<p><b><i>Should the Borough be taking any of Leicester City's declared unmet housing need?</i></b></p> <p>3.25 The 'presumption' in the NPPF directs that development plans should accommodate unmet needs arising in other authority areas. That emphasis is repeated in the tests of soundness, which say that in order for a plan to be positively prepared, it must be informed by agreements that will enable unmet need to be accommodated.</p> <p>3.26 Consequently, if the Plan were not to make any provision for unmet need arising in Leicester, there is a risk that it will not be positively prepared, and therefore unsound. There is a</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>Local planning authorities in the Housing Market</p>

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		<p>risk also that the Plan may be in conflict with the ‘presumption’ in Paragraph 11 of the NPPF.</p> <p>3.27 The Council will, of course, be under a duty to co-operate with its neighbours. As part of that it will need to demonstrate that is engaged in “effective and ongoing” working with the other authorities in the HMA to assess the potential for accommodating a proportion of the unmet need arising in Leicester. Whilst it is not a duty to agree, it will be necessary for the engagement that the Council carries out to generate critical outputs, and which will make clear how the issues of unmet need in Leicester are going to be dealt with. To that end, Jelson notes that Statement of Common Ground that was prepared by the Leicester and Leicestershire authorities in March 2021, and which sets out the evidence base that is being commissioned to inform an apportionment of unmet needs within the HMA.</p>	<p>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.</p>
<p>Avison Young – on behalf of Jelson Ltd</p>	<p>29<sup>th</sup> October 2021</p>	<p><b>4. Representations on Green Wedges</b></p> <p>4.1 Part of WIG/004 is located in the Green Wedge (with the remainder located in the countryside). The Green Wedge encapsulates WIG/003 and WIG/006 as well. When preparing the current adopted Plan, the Council carried out a Green Wedge Review. It used this to make some changes to the boundaries of the Green Wedges in the Borough. Principally, those changes facilitated: i) the release of the Stoughton Grange Direction for Growth; and ii) the creation of a new area of Green Wedge to the south of the Cottage Farm Direction for</p>	<p>Noted.</p> <p>The Council will test various options during the course of preparing the Local Plan. A review of Green Wedges will be undertaken in the course of preparing the emerging new Local Plan. Therefore, this representation will be taken into account by the Council when reviewing the current Green Wedge Review.</p>

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		<p>Growth, with a small part of that new designation encroaching onto the northern part of Jelson’s land.</p> <p>4.2 We promoted Jelson’s land for allocation during the preparation of the current adopted Plan. At the time, we expressed concern about the robustness of the Green Wedge Review that had been undertaken by the Council. Our primary concern was that the Review failed, at a micro-level, (i.e. at a finer grain of detail than the three broad sub-areas that the Review identified) to consider what the impact on the performance of the Green Wedges would be if parts of it were released for development.</p> <p>4.3 We also made submissions to the Examination of the current Plan regarding the wording of Policy 42, noting that the Policy was in danger of placing a blanket ban on built development. Whilst the Policy was amended during the course of the Examination, its effect is only to allow built development where that is associated with the specific types of uses that the Policy says are acceptable in the Green Wedges.</p> <p>4.4 The Council’s Green Infrastructure topic paper comments on the role of Green Wedges in the Borough, and says that they are, “extremely important; they play major roles in shaping the character of the environment and help stimulate leisure and tourism whilst improving residents and visitors quality of life”.</p>	

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		<p>4.5 The Council then outlines two options for policies relating to Green Wedges. We reproduce these as follows.</p> <ul style="list-style-type: none"> <li>• “Continue with the existing policy approach and retain the Green Wedge designations, as set out in the Council’s current Local Plan and its evidence base.</li> <li>• Consider whether or not to undertake a Green Wedge Review in order to establish whether or not to retain, create new or amend the boundaries of the existing Green Wedges in order to take account of the new Local Plan proposed site allocations and any other factual updates”.</li> </ul> <p>4.6 Having regard to the general points made on the previous page, we turn to answer the specific questions posed by the Council.</p> <p><b><i>Should the Council ‘roll forward’ the current Local Plan policy relating to Green Wedges with minor wording amendments to ensure that it is up-to-date with current national planning policy and guidance?</i></b></p> <p>4.7 Jelson remains of the view that Policy 42 adopts an overly-restrictive approach to Green Wedges, whereas the NPPF encourages a more balanced approach (i.e. an assessment of benefits versus harm). In the context of the scale of LHN that the Council needs to plan for, and the prospect of needing to make a contribution towards unmet need arising from Leicester, we think that the Council should take the opportunity to consider an amendment to its policy on Green Wedges, that would allow for development to be permitted in circumstances</p>	

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		<p>where it can be demonstrated that it would not have an unacceptable adverse impact on the stated objectives of the Green Wedges or where the benefits of allowing the development would outweigh the harm that would be caused by it.</p> <p><b><i>Should the Council consider whether or not to undertake a Green Wedge Review in order to establish whether or not to retain, create new or amend the boundaries of the existing Green Wedges in order to take account of the new Local Plan proposed site allocations and any other factual updates?</i></b></p> <p>4.8 In order for the Plan to be positively prepared, effective and justified (and to be based on an appropriate strategy), and therefore sound, it will need to be based on robust evidence. Given the scale of growth that the Council is likely to need to plan for, we anticipate that it will need to look to land that is currently in the Green Wedge to accommodate new growth. It does not follow, though, that this would irresistibly lead to harmful outcomes. It would be possible, for example, to deliver new residential development on Jelson’s land at Newton Lane whilst maintaining separation between the urban areas of Oadby and Wigston.</p> <p>4.9 It is for this reason that we encourage the Council to update its evidence base around Green Wedges in order to ensure that it takes decisions based on the most up-to-date available analysis, and to demonstrate that its Plan is sound. It will be important, though, for any review of the Green Wedges</p>	

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		<p>to:</p> <p>a) carry out an analysis of each Green Wedge, broken down into sectors as necessary / appropriate, determining the extent to which the land performs one of more of the roles expected of the Green Wedge; and</p> <p>b) assess the extent to which the boundaries of the Green Wedge could be amended without compromising the ability of the designations to satisfy their stated objectives.</p>	
<p>Avison Young – on behalf of Jelson Ltd</p>	<p>29<sup>th</sup> October 2021</p>	<p><b>Representations on Other Matters</b></p> <p>5.1 In this section, we set out Jelson’s representations on a selection of the issues and questions posed in the other topic papers that make up the Council’s consultation document.</p> <p><b>Infrastructure Paper</b></p> <p>5.2 The Council observes that the Borough accommodates three arterial routes into, and out of, the city of Leicester, and that this gives rise to significant congestion across the local highway network. The Council goes on to say that new development “adds pressure” to the network. This leads it to set out some options for policy mechanisms to secure contributions to the delivery of highways infrastructure, reproduced as follows.</p> <ul style="list-style-type: none"> <li>• “Set out in Local Plan Policy that all residential developments that meet the ‘large site’ threshold of 10 or</li> </ul>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery and highways.</p> <p>The Council is aware of the extreme shortages in funding for infrastructure. We are committed to seeking to deliver the most sustainable developments and as part of that decision process; we must seek to investigate by engaging with all partners to seek innovative ways of ensuring that the necessary infrastructure to support growth is in place.</p>

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		<p>more dwellings, must provide contributions to support the delivery of local / strategic highway infrastructure solutions.</p> <ul style="list-style-type: none"> <li>• Set out in Local Plan Policy that all residential developments regardless of size will be required to provide contributions to support the delivery of local / strategic highway infrastructure solutions.</li> <li>• No policy wording encouraging or requiring the provision of contributions to support the delivery of local / strategic highway infrastructure solutions”.</li> </ul> <p>5.3 Jelson does not agree with a blanket approach that requires all development to contribute to highways infrastructure improvements, because there is a risk that some developments would not generate impacts that require mitigation but would nevertheless be expected to contribute towards infrastructure. That would be in conflict with the statutory tests found in Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended), which require contributions to be directly related to the development, necessary to make it acceptable in planning terms and fairly and reasonably related in scale and kind.</p> <p>5.4 The starting point should instead be for the Council to plan for development in sustainable locations where there will be alternatives to travelling by private car. Jelson’s land at Newton Lane is located in a sustainable location adjacent to the urban area, and close to existing bus stops, thereby meaning there is good access to the public transport network from the site (as we describe in Section 2).</p>	



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		<p>5.5 With these points in mind, we turn to answer some of the Council's questions on infrastructure matters.</p> <p><b><i>Should the Council require all development to provide contributions to support the delivery of local / strategic highway infrastructure solutions?</i></b></p> <p><b><i>Should the Council encourage applicants to provide contributions to support the delivery of local/strategic highway infrastructure solutions?</i></b></p> <p>5.6 We take these two questions together. As we have indicated in our commentary above, the Plan should support the provision of contributions towards infrastructure where there is a demonstrable impact arising on the network from a development and where infrastructure improvements are necessary to mitigate that impact. This approach will ensure compliance with CIL Regulation 122. As part of the plan-making process, the Council will assess Borough-wide impacts associated with planned growth and will therefore be able to identify where infrastructure improvements may be required and which developments may need to contribute to them.</p>	
Avison Young – on behalf of Jelson Ltd	29 <sup>th</sup> October 2021	<p><b>Local Housing</b></p> <p>5.7 In this topic paper, the Council, amongst other things, asks for views on how the new Plan should tackle self and custom build. The adopted Plan includes a Policy (Policy 14) that generally supports proposals for self and custom build plots.</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing. This will include measuring the demand for self-build in the Borough</p>

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		<p>5.8 The Council says that the new Plan could continue that approach, or it could adopt an alternative approach where all major development is required to provide a proportion of self and custom build plots. We recall that earlier iterations of the adopted Plan proposed such an approach, but that it was removed from allocation policies during the course of the Examination.</p> <p>5.9 Jelson would support continuation of the current approach of having a general policy that supports self and custom build development. This will ensure that where development proposals include such plots (which would, we expect, be driven by where there is demand for them), they can be delivered. The alternative approach would require delivery with no evidence of demand, and this would not be supported.</p> <p><b><i>Should the Council ‘roll forward’ the current policy approach set out in Local Plan Policy 14 – Self Build and Custom Build, ensuring that it is up to date with current national planning policy and guidance?</i></b></p> <p>5.10 For the reasons given above, the answer is ‘yes’.</p>	<p>and how any needs determined can best be enabled within the Borough.</p>
<p>Avison Young – on behalf of Jelson Ltd</p>	<p>29<sup>th</sup> October 2021</p>	<p><b>6. Comments on the Sustainability Appraisal Scoping Report</b></p> <p>6.1 We have reviewed on behalf of Jelson the Scoping Report prepared by the Council. The Scoping Report indicates that the Sustainability Appraisal will:</p>	<p>Noted.</p> <p>The Local Plan’s Sustainability Appraisal must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>

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		<p>a) comprise of 21 sustainability objectives; and                      b) carry out an assessment of options for growth, policies and site allocations against those objectives.</p> <p>6.2 At this stage, Jelson has no specific observations to make on the 21 objectives that have been chosen to form the basis of the assessment. Its general comment is that it will be important for the Council to ensure that the Sustainability Appraisal considers all reasonable alternatives and options for assessment, so that it comprises a robust piece of evidence to inform the new Plan.</p> <p>6.3 Jelson may wish to comment on the outputs of the Sustainability Appraisal that accompany subsequent versions of the Plan, as it progresses through its preparation.</p>	<p>The specific recommendations to improve and strengthen the relevant aspects of the Sustainability Appraisal element of the Local Plan preparation have been noted and will be considered accordingly.</p>

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<p>Barton Willmore (now Stantec) on behalf of The Co-operative Group</p>	<p>20<sup>th</sup> October 2021</p>	<p><b>LPA SITE REF: OAD/003 (Call for Sites)</b></p> <p><b>The Site</b></p> <p>The Site which forms the basis of this ongoing promotion extends to approximately 6.07 hectares and effectively wraps around the Spire Leicester Hospital site and eastwards into the existing Stoughton Grange Direction for Growth Allocation, to the south of Gartree Road in the north-east of the Borough.</p> <p>The Site comprises two distinct land parcels, the first and largest, to the west is irregular in shape and wraps around the Spire Leicester Hospital. It provides a frontage to Gartree Road, to the west of the hospital access, and is bounded by residential properties to the west and south, which front Gartree Road, The Broadway and The Fairway. A number of trees and hedgerows line the periphery of this parcel. The second parcel, to the east, is broadly triangular in shape and again has a frontage to Gartree Road to the north. The entirety of this parcel lies within the Stoughton Grange Direction for Growth Allocation, and is therefore currently allocated for development, but does not form part of the residential development site currently being brought forward by Bellway Homes under outline planning permission 18/00178/OUT and reserved matters approval 19/0523/REM. The eastern extent of this parcel is defined by the 'Proposed Transport Route' that is allocated within the adopted Local Plan to protect the desired route of the Eastern District Distributer Road (EDDR). The Road has no funding and there is no timetable for its delivery; but it has remained an ambition to date.</p> <p>The Site is entirely greenfield and undeveloped. In policy terms, the parcel which wraps around the hospital is "white land", in that it lies within the Council's urban boundary, and the Leicester Principal Urban Area (PUA), but is unallocated. As stated above, the triangular land parcel to the east of the</p>	<p>Noted.</p> <p>The Council would like to thank Barton Willmore (now Stantec) for taking time to read through the consultation document and for responding to the consultation on behalf of The Co-operative Group).</p> <p>The Local Plan will consider a variety of sites by size and location to determine the best options for delivering the Borough's housing requirement.</p> <p>All sites received to date via the Call for Sites process in 2020 and 2021 will be taken into account accordingly.</p>
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		Site forms part of a wider Direction for Growth Allocation, where the principle of development is already accepted.	
Barton Willmore (now Stantec) on behalf of The Co-operative Group	20 <sup>th</sup> October 2021	<p><b>Promotion and Future Development Opportunity</b></p> <p>Policy 47 of the Local Plan requires that the Council undertakes a full or partial review of the Plan within 5 years of adoption; i.e. by 2024. This review could commence sooner in the event that this is triggered by the Plan’s monitoring framework. Should this review reveal that additional land is required to meet the Borough’s housing needs, the Council will need to consider an appropriate location for this land release. The lack of available brownfield land opportunities in the Borough means that this is likely to come from Greenfield land release and we consider that the Co-op’s land holdings identified by this submission provides an excellent opportunity to deliver a significant number of homes in a sustainable location.</p> <p>It is also pertinent to recognise that, whilst the Council’s housing requirement for the new Local Plan is not yet known, it is likely to represent an uplift on the previous figure, particularly given the likely requirement to absorb some of Leicester City’s unmet housing need. Again, the extent of this is not clear currently, but it is apparent that the Council will need to seek suitable and sustainably located greenfield sites in order to meet the Borough’s and, in part, Leicester’s housing need over the next Plan period.</p>	<p>Noted.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council’s Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>The Council will also undertake evidence gathering in terms of infrastructure and transport at a strategic and local level and the findings of these studies (and all evidence base) will inform policies related to housing and new development, including that related to the consideration and assessment of specific sites put forward for new growth opportunities.</p> <p>As part of this work, the Council has already begun and will continue to regularly engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions will continue to take shape.</p> <p>For example, Local planning authorities in the Housing Market Area (HMA) have mechanisms in place that enable joint working and addressing such</p>

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		Notwithstanding this, our Client considers that their land interest adjacent to Spire Hospital presents the opportunity to deliver housing to meet the increased future needs within the urban area and is of a scale such that it has minimal infrastructure requirements, meaning that it can be delivered early within the Plan period.	matters under the Duty to Co-operate and regular reviews of a Statement of Common Ground.
Barton Willmore (now Stantec) on behalf of The Co-operative Group	20 <sup>th</sup> October 2021	<p><b>Regulation 18 Issues and Options Consultation</b></p> <p><b>Part 2 – Overarching Policy Areas (Strategic Challenges)</b></p> <p><b><i>Is the suggested Local Plan time period of ‘date of adoption to the year 2041’ appropriate?</i></b></p> <p>Our Client notes at paragraphs 4.5 and 4.6 of the Issues and Options Document (the “I&amp;O Document”) that the new Local Plan will cover a period up to 2041, with adoption of the Plan anticipated in 2023, thus resulting in a Plan period of 18 years. Our Client considers that this is technically sufficient in order to align with the provisions of Paragraph 22 of the National Planning Policy Framework 2021 (NPPF), which sets out that Plans should look ahead over a minimum 15 year period from adoption.</p> <p>In addition to the above, our Client welcomes the Council’s recognition that whilst brownfield land is a focus for development, there will come a point where greenfield land is required, noting that the development needs of the Borough will not be met through urban regeneration alone. This highlights the need for sustainable, substantial greenfield sites to be allocated for development as part of the new Local Plan,</p>	Noted.

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		and our Client remains firmly of the view that their land interest adjacent to Spire Hospital is a wholly appropriate location for future housing development.	
Barton Willmore (now Stantec) on behalf of The Co-operative Group	20 <sup>th</sup> October 2021	<p><b>Part 3 – Housing (Strategic Challenges)</b></p> <p><b><i>Is there any robust evidence to suggest that the Council should continue to use the current housing requirement of 148 new homes per year set out within the current Local Plan?</i></b></p> <p>No, whilst it is apparent that the Council considers it has sufficient land available to deliver 148 new homes per annum, the prevailing indication is that the Housing and Employment Needs Assessment (HENA), which is yet to be published, will indicate that an approximate 22% uplift in the housing requirement is necessary (resulting from the Standard Methodology, and as indicated within the Consultation Document). The Council also states that the delivery of housing in the Borough is a “consistent challenge” owing to the compact nature of the Borough, suggesting that even if the Council was to maintain its current housing requirement, greenfield land would likely be required to sustain this level of growth, owing to the finite nature of brownfield land within the Borough.</p> <p>In addition, there are no environmental or infrastructure constraints that would prevent the Council from meeting an increased housing requirement over the new Plan period.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will also inform policies related to housing.</p>

**Appendix A: Representations received during the Regulation 18A Issues and Options Local Plan Public Consultation 2021 (with Officer Responses)**

Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Barton Willmore (now Stantec) on behalf of The Co-operative Group	20 <sup>th</sup> October 2021	<p><b><i>Should the Council use the housing need figure of 180 new homes per year calculated by the Standard Method?</i></b></p> <p>Paragraph 60 of the NPPF indicates that, to determine the number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the Standard Method, unless there are exceptional circumstances that justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. Therefore, the Standard Method requirement is to be treated as a starting point, and that the requirement should also consider the unmet need of neighbouring authorities, including the City of Leicester.</p> <p>Further clarity on this will be provided following the publication of the HENA, and our Client urges the Council to publish this document as soon as possible in order that the Policy incorporates the appropriate approach from the outset. It is clear, however, that even an uplift to 180 dwellings per annum will necessitate the release of greenfield land in sustainable locations citing the “constant challenge” the Council readily accepts in delivering the current, lower requirement.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will also inform policies related to housing.</p>
Barton Willmore (now Stantec) on behalf of The	20 <sup>th</sup> October 2021	<p><b><i>What should the Council do if the HENA outcomes suggests that there should be a diversion from the Standard Method?</i></b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations,</p>



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Co-operative Group		As stated above, the NPPF indicates that the level of housing need should be informed by a local housing needs assessment. The HENA, which is currently being prepared, is considered to represent such an assessment, and its preparation is welcomed by our Client. Whilst the early indications are that the findings of the HENA will align with the Standard Method figure of 180 dwellings per annum, it has not yet been published, and so its findings are not yet known. If, however, it transpires that a different level of need is appropriate and sound, also having regard to the unmet need of neighbouring authorities, other demographic trends or market signals, then the Council would need to be satisfied that these represent the exceptional circumstances required to justify any deviation from the Standard Method.	<p>policy and guidance.</p> <p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Barton Willmore (now Stantec) on behalf of The Co-operative Group	20 <sup>th</sup> October 2021	<p><b><i>Should the Borough area be taking any of Leicester City's declared unmet housing need?</i></b></p> <p>Our Client acknowledges that Oadby and Wigston is a compact borough, and recognises the challenges that it faces in meeting its own development needs. It is important to note, however, that Leicester also faces significant challenges in meeting its housing needs and faces similar challenges in delivering the level of housing it requires, albeit the extent of this is much greater owing to it being a city centre and a focus for growth and the absence of an ability to turn to major areas</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies</p>

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		<p>of undeveloped greenfield land on the edge of the existing settlement. The related housing need, and in particular affordable housing needs, do not disappear, however. Therefore, this being the case it is important that all of Leicestershire Borough's play their part in assisting Leicester and so our Client considers that Oadby should assist in meeting the unmet need.</p> <p>It is noted that a Statement of Common Ground is currently being prepared to establish how the unmet need will be met and where, although this is yet to be published. It is essential that this be published as soon as possible to ensure that the Plan is reactive to this, and to provide greater clarity and certainty that the need will be met. It is noted that Oadby has a functional relationship with the City of Leicester, more so than some of the other Leicestershire Boroughs, and so Oadby and Wigston may be better placed to absorb some of this need than other Boroughs, for example Harborough.</p> <p>In releasing sustainable and suitable greenfield sites for development the Borough can ensure that it can meet its own increasing housing need, whilst also assisting Leicester City's unmet need.</p>	<p>related to all aspects of the Plan.</p> <p>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.</p>
Barton Willmore (now Stantec) on behalf of The Co-operative Group	20 <sup>th</sup> October 2021	<p><b><i>Should the Council 'roll forward' the current Local Plan policy relating to housing density ensuring that it is up-to-date with national policy and guidance?</i></b></p> <p>Our Client recognises the Council's success in achieving development which meets the minimum density targets in the Borough and considers that rolling-forward this requirement</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms</p>

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		<p>should allow this success to continue. Notwithstanding this, and as stated above, the Council is facing an uplift in housing requirement of approximately 22% and already admits challenges in meeting its existing, lower housing requirement.</p> <p>The Council would need to ensure that any increase in density would accord with the prevailing character of the area within which a development site lies, and so suitable caveats may be required in this respect, but it is recognised that there are a number of substantial properties in very large plots across the Borough, and so new development could not realistically be expected to mirror this.</p>	<p>of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p>
<p>Barton Willmore (now Stantec) on behalf of The Co-operative Group</p>	<p>20<sup>th</sup> October 2021</p>	<p><b><i>Should the Council require applicants to provide older persons housing and / or accommodation, on all development sites regardless of size?</i></b></p> <p>Whilst our Client welcomes encouragement to the provision of older persons housing on development sites, they do not consider that it should be a requirement for all development sites. There are a number of reasons for this, including that certain sites may not be attractive or suitable for older persons housing, owing to their location or physical characteristics. It would also be unrealistic to force developments of low numbers (for example single units or single figure developments) to provide older persons housing as it may impact upon viability.</p> <p>Furthermore, there is no evidence available to provide an up-to-date figure on the need for such housing. Whilst it is accepted that the population in the Borough is aging, this does</p>	<p>Noted.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>In addition to this, the Council will also undertake a whole plan viability assessment, as well gather evidence for other aspects of the plan relating to infrastructure and housing choices. The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the emerging new Local Plan and by doing so, these discussions can begin to take place.</p>

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		<p>not necessarily translate into an increased need in older persons housing. The awaited HENA may provide some clarity in this regard.</p> <p>Notwithstanding this, however, there may be instances where older persons housing can be accommodated on a development, or indeed where market signals indicate such housing would be attractive. In such circumstances said development is to be encouraged, and our Client notes the capacity for their land interest at Spire Hospital, Oadby to accommodate such housing if deemed necessary. This would not however prejudice our Client's position that the land in question would also be suitable for market and affordable housing, as stated elsewhere within this document.</p>	
Barton Willmore (now Stantec) on behalf of The Co-operative Group	20 <sup>th</sup> October 2021	<p><b>Part 6 – Green Infrastructure (Strategic Challenges)</b></p> <p><b><i>Do you think that the Council should maintain the current Local Plan policy position relating to Green Infrastructure, in the new Local Plan, with minor wording amendments to ensure that it is up-to-date with current national planning policy and guidance?</i></b></p> <p>Our Client notes that the approach outlined within the question above is the only option that the Council is considering in respect of Green Infrastructure. Our Client does not object to this but would request that any future policy in respect of Green Infrastructure is worded such that it provides for a balancing exercise to ensure that any impacts on Green Infrastructure are weighed against the benefits of a scheme.</p>	<p>Noted.</p> <p>The recommendation to review and consider the wording of the Green Infrastructure Policy carefully is noted and will be given consideration in due course.</p>

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		Set against the context of uplifted housing needs and existing challenges in finding sufficient land, it is important that the Council does not have its “hands tied” when considering the provision of new development on greenfield sites across the Borough.	
Barton Willmore (now Stantec) on behalf of The Co-operative Group	20 <sup>th</sup> October 2021	<p><b>Part 9 – Housing (Local Challenges)</b></p> <p><b><i>Do you consider that ‘First Homes’ will be of genuine benefit to the local communities within the Borough area?</i></b></p> <p>Yes. Our Client recognises that, in broad terms, Oadby and Wigston is an affluent Borough. Particularly with regard to Oadby, it is clear that a provision of First Homes and affordable homes will allow local first-time buyers to remain local, where they may not otherwise be able to afford a home in Oadby. Our Client also recognises, however, that such provision can often impact upon development viability, and so it is important to ensure that any policy provision in this respect provides suitable flexibility should scheme viability become a concern (demonstrated through evidence). It is clear however that the larger developments are often better placed to deliver affordable homes and the provision of such is fully supported by our Client.</p> <p>In addition, our Client notes that the development of their land interest adjacent to Spire Hospital has the potential to deliver affordable dwellings as part of a wider development, this being a significant benefit of the scheme, heightened by the</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing and in particular affordable housing, (including ‘First Homes’).</p> <p>In particular, evidence will indicate whether current levels of affordable housing are still appropriate.</p>

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		affluence of the area and the need for affordable homes in this location.	
Barton Willmore (now Stantec) on behalf of The Co-operative Group	20 <sup>th</sup> October 2021	<p><b><i>Should the Council 'roll forward' the current policy approach set out in Local Plan Policy 14 – Self Build and Custom Build, ensuring that it is up to date with current national planning policy and guidance?</i></b></p> <p>Our Client is content with the Council's intention to roll-forward Local Plan Policy 14 but considers it important that the policy retains suitable flexibility in the delivery of self-build housing, should site-specific matters arise that preclude its delivery. This approach was deemed to be sound by the Inspector who presided over the Examination of the adopted Local Plan.</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing. This will include measuring the demand for self-build and custom build in the Borough and how any needs determined can best be enabled within the Borough.</p>
Barton Willmore (now Stantec) on behalf of The Co-operative Group	20 <sup>th</sup> October 2021	<p><b>Which of the above potential options [sustainable home requirements] do you consider to be the most appropriate?</b></p> <p>Our Client recognises and supports the need for sustainable homes, as well as the need for them to incorporate suitable infrastructure for the future. Indeed, our Client is also supportive of the potential sustainability measures which have been mooted within the I&amp;O Document. These being:</p> <ul style="list-style-type: none"> <li>• Solar photovoltaic energy producing technology</li> <li>• Electric vehicle charging points</li> <li>• Ground and / or air source heat pumps</li> <li>• Wind energy producing technology</li> <li>• Water energy producing technology</li> </ul>	<p>Noted.</p>

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		<ul style="list-style-type: none"> <li>• Grey water recycling</li> </ul> <p>Our Client considers that all of the above measures have a role to play in the delivery of sustainable homes, but it is important to recognise that not all measures will be appropriate or necessary for all sites. A suitable assessment at the planning application stage will reveal how best a site can deliver sustainable design.</p>	
Barton Willmore (now Stantec) on behalf of The Co-operative Group	20 <sup>th</sup> October 2021	<p><b>Part 10 – Design and Character (Local Challenges)</b></p> <p><b><i>Should the Council be producing a criteria based policy, and if so, what criteria / design principles should be included?</i></b></p> <p>Our Client has no specific objection to the incorporation of a criteria based policy within the Local Plan, although they would urge caution as to the level of detail specified within the Policy. Any criteria-based policy would need to be carefully worded so as to not be over-prescriptive. This has the potential to impact on the viability of otherwise acceptable schemes but also can have the potential to stifle creativity. It may hinder a development’s ability to be locally distinctive or to incorporate modern design. It is important therefore that any policy, whilst setting out broad criteria for developments to achieve, should also be sufficiently flexible, both to account for any limitations influenced by scheme viability but also give developers confidence to “push the envelope” where appropriate, to foster high quality, distinctive development.</p>	<p>Noted.</p> <p>The Council is currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to design and character.</p> <p>The recommendation to review and consider the inclusion of a criteria-based Policy carefully is noted and will be given consideration in due course.</p>

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		The above response also applies to the questions posed within the I&O document in respect of Design Codes.	
Barton Willmore (now Stantec) on behalf of The Co-operative Group	20 <sup>th</sup> October 2021	<p><b>Should all new development be required to make use of the highest quality methods of construction and use the highest quality materials, and seek to refuse development proposals that do not provide this.</b></p> <p>As above, our Client welcomes the Council’s intention to seek development of the highest quality, and does not object to the principle of all new developments being required to provide high quality materials. It is important to ensure that any policy requirements in this regard are not overly prescriptive so as to stifle development viability. We would recommend that any policy incorporate suitable caveats to ensure that otherwise acceptable developments are not precluded from coming forward as a result of overly stringent material requests.</p> <p>The Council should also be wary of using policy terms that could be lost in translation. For example, before referring to the need to use the ‘highest quality materials’, it should ask itself what this actually means and how will this be expressed either in the policy or within its supporting text. How will the Council determine what the highest quality materials or methods of construction are? We advise that the Council consults with the development industry in relation to such matters before determining whether to pursue such a policy.</p>	<p>Noted.</p> <p>The Council is currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to design.</p> <p>The recommendation to review and consider the wording in relation to the Council seeking ‘<i>highest quality materials</i>’ is noted and will be given consideration in due course.</p>
Barton Willmore (now	28 <sup>th</sup> October	<b>REPRESENTATIONS ON BEHALF OF THE CO-OPERATIVE GROUP</b>	Noted.



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Stantec) on behalf of The Co-operative Group	2021	<p>Within previous submissions, our Client submitted its land to the south of Gartree Road for consideration as a future housing allocation, but also indicated the potential for the incorporation of additional land owned by the University of Leicester, to form a wider land parcel. Since the previous submissions were made back in November 2020, the Co-op and the University have progressed positive discussions around the potential to combine their respective land holdings in order to explore the combined development opportunity that this presents. As a result, our Client is hereby pleased to submit the wider holding, incorporating the land to the South of Gartree Road and that to the east of Stoughton Road (the “Site”), for the Council’s consideration as part of the evolving Local Plan, as an exciting opportunity to deliver a sustainable and high quality area for growth. The nature of the Site, and the opportunities it affords, are set out in further detail below as well as within the promotional and technical material which is enclosed alongside this submission. This comprises the following documents:</p> <ul style="list-style-type: none"> <li>• Vision Document, prepared by Barton Willmore;</li> <li>• Drainage Investigations and Strategy Note, prepared by Pegasus;</li> <li>• Transport Technical Note, prepared by Eddisons;</li> <li>• Phase 1 Ecological Appraisal and Ecological Technical Note, prepared by Rachel Hacking Ecology;</li> <li>• Position Statement from the University of Leicester;</li> <li>• Preliminary Arboricultural Appraisal, prepared by Middlemarch Environmental; and</li> </ul>	<p>The Council would like to thank Barton Willmore (now Stantec) for taking time to read through the consultation document and for responding to the consultation on behalf of The Co-operative Group.</p> <p>The Local Plan will consider a variety of sites by size and location to determine the best options for delivering the Borough’s housing requirement.</p> <p>All sites received to date via the Call for Sites process in 2020 and 2021 will be taken into account accordingly. Please note that all of the submitted supporting documents (listed) will also be taken into consideration as part of this process.</p>

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		<ul style="list-style-type: none"> <li>• Residential Suitability Assessment – Ground Conditions, prepared by WSP</li> </ul> <p><b>The Site</b></p> <p>The Site which forms the basis of this promotion extends to approximately 33.65 hectares and is predominantly used as agricultural land currently, with a small parcel (approximately 0.3 hectares), to the east of Stoughton Road and south of the main site of the University of Leicester’s Stoughton Road Playing Fields, forming a University football pitch, which is an annex to the main Playing Fields. The Site is located to the south of Gartree Road and east of Stoughton Road and is located to the north-east of the Borough. The full extent of the Site is set out within the enclosed Vision Document which accompanies this letter and is provided in support of the submission.</p> <p>The Site comprises four distinct land parcels, defined by strong hedgerow boundaries and sporadic trees. There are also a number of trees located to the north of the Site adjacent with the boundary with the Playing Fields and along the southern boundary of the Site, adjacent to the rear gardens of the residential properties on Launde Road and Copse Close. As described above, one of the aforementioned land parcels is occupied by one of the University’s football pitches.</p> <p>The Site for which this submission is based comprises greenfield land and, in technical terms is constraint free. In adopted planning policy terms, the entire Site lies within the</p>	

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		designated Green Wedge, as defined by the adopted Oadby and Wigston Local Plan (2019). In addition, the northernmost land parcel, which adjoins Gartree Road to the north, is allocated in the adopted Local Plan for a cemetery use. This, along with the Green Wedge designation, is discussed in more detail below.	
Barton Willmore (now Stantec) on behalf of The Co-operative Group	28 <sup>th</sup> October 2021	<p><b>Promotion and Future Development Opportunity</b></p> <p>Policy 47 of the Local Plan requires that the Council undertakes a full or partial review of the Plan within 5 years of adoption, i.e. by 2024. This review could commence sooner in the event that this is triggered by the Plan’s monitoring framework. Should this review reveal that additional land is required to meet the Borough’s development needs, the Council will need to consider an appropriate location for this land release. The lack of available brownfield land opportunities in the Borough means that additional development land would largely come from Greenfield land release, and we consider that the Co-op’s and University of Leicester’s land holdings identified by this submission provides an excellent opportunity to deliver a significant number of homes in a sustainable location.</p> <p>It is also pertinent to recognise that, whilst the Council’s housing requirement for the new Local Plan is not yet known, it is likely to represent an uplift on the previous figure, based on a) the need identified by using the Standard Method for calculating housing need, and b) the potential requirement to absorb some of Leicester City’s unmet housing need. Again,</p>	<p>Noted.</p> <p>The Council will review all existing designations, including Green Wedges, as part of the emerging Local Plan.</p>

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		<p>the extent of this is not clear currently, but it is apparent that the Council will need to seek suitable and sustainably located greenfield sites in order to meet market and affordable housings need over the next Plan period.</p> <p>Our Client recognises, however, that the Site is presently designated as a Green Wedge in the adopted Local Plan and so it is pertinent to consider how the Site performs against the Green Wedge criteria prescribed by Policy 42 of the adopted Local Plan, this is set out below.</p>	
<p>Barton Willmore (now Stantec) on behalf of The Co-operative Group</p>	<p>28<sup>th</sup> October 2021</p>	<p><b>Green Wedge Assessment, Land East of Stoughton Road and South of Gartree Road</b></p> <p><b>Green Wedge Objective:</b> <b>Prevent the merging of settlements</b></p> <p><b>Commentary:</b> The development of the Site will not result in the merging of settlements because there are no settlements directly north or east of the Site, with the exception of Stoughton village, which is located approximately 600 metres to the north-east of the Site, leaving a significant undeveloped separation.</p> <p>Furthermore, Gartree Road, immediately north of the Site is a clear and defensible boundary which will prohibit any encroachment towards Stoughton village. The Site is enclosed by built development to the south and the west meaning that it is enclosed on three sides by existing built development and urban form.</p>	<p>Noted.</p> <p>The Council will review all existing designations, including Green Wedges, as part of the emerging New Local Plan.</p> <p>Therefore, this representation and the supporting submissions will be taken into account by the Council when reviewing the current Green Wedge Review.</p>

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		<p>To the east of the Site there is again a clear defensible, landscaped field boundary beyond which is extensive countryside. It should also be noted that the development of the Site would not extend beyond the existing eastern extents of Oadby, meaning that development would result in “rounding off” of the existing settlement form.</p> <p><b>Green Wedge Objective: Guide development form</b></p> <p><b>Commentary:</b> This is not defined by Policy 42, but it is taken as meaning that the Green Wedge provides a barrier to development and defines the settlement boundary.</p> <p>As above, the Site adjoins existing development to the south and west and will assimilate into its surroundings in this regard. Whilst the Stoughton Road Playing Fields are predominantly a “green” use, the physical characteristic is very much urban as a result of the maintained form of the landscape and the presence of built infrastructure in the form of the pavilion, car parking and approved flood lighting (permission ref: 19/00421/FUL). The Site also benefits from clear and defensible boundaries to the north (i.e. Gartree Road) and to the east by a strong field boundary. As a result, the development of the Site would retain strong boundaries and would not facilitate further gradual encroachment into the countryside. It is considered that the existing built-form in the vicinity of the Site has been influenced by the piecemeal</p>	

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		<p>release of field parcels over time, rather than being defined by the Green Wedge itself; evidenced by the recent review of Green Wedge boundaries in this area through the adoption of the current Local Plan.</p> <p><b>Green Wedge Objective:</b>  <b>Provide a ‘green lung’ between the urban area and the countryside</b></p> <p><b>Commentary:</b>                      Policy 42 does not provide a definition of ‘green lung’. Notwithstanding this however the development of the Site would include a suitable landscaping scheme which would provide both visual and environmental benefits representing a net gain in biodiversity terms. The development would also provide new green corridors and areas of open space, as well as the enhancement of the existing Public Rights of Way, maintaining the site’s contribution to the ‘green lung’. In addition, it would not undermine the function of the remaining Green Wedge area, which would not be significantly eroded, or the environmental benefits of the neighbouring countryside. We also consider that the Site does not currently represent a parcel of undeveloped land in an otherwise built-up location, which one would normally expect of a “green lung”. It is a location where the existing settlement meets undeveloped countryside.</p> <p><b>Green Wedge Objective:</b>  <b>Act as a recreational resource</b></p>	

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		<p><b>Commentary:</b>            Other than its visual appearance the existing Site, which is private agricultural land, offers very little as a recreational resource, with the exception of public footpaths D16, which is within the Site, and Z4, which lies adjacent to the Site. These footpaths, however, are not heavily utilised.</p> <p>The development of the Site would enhance the aforementioned public footpaths and would, through the provision of public open space (as well as areas of play for children), provide improvements in terms of recreation provision and over and above that which the Site currently offers.</p> <p>The development of the Site would see the relocation of an existing University football pitch, and this is a privately owned facility. Furthermore, as illustrated in the Vision Document, the proposed redevelopment will see the pitch re-located, rather than lost.</p> <p>Any recreational resource that the Site offers now, could therefore be maintained through the Site’s development.</p> <p>...</p> <p>Taking the above in the round, the Site is considered to perform poorly against the Green Wedge objectives prescribed by Policy 42, meaning that its allocation for development would clearly be justified. Whilst not undermining the purpose of the remaining Green Wedge land the development of the</p>	

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		<p>Site could facilitate enhancements to the benefit of local residents, including the provision of dedicated public open space and play areas, ecological and landscape enhancements as well as improvements to existing Public Rights of Way and the settlement edge. Accordingly, it is considered that the development of this modest area of Green Wedge land would be permissible. We acknowledge that the Council would undertake its own Green Wedge Assessment in due course as part of the Local Plan evidence base, and trust that the above comments will be taken into consideration.</p>	
<p>Barton Willmore (now Stantec) on behalf of The Co-operative Group</p>	<p>28<sup>th</sup> October 2021</p>	<p><b>Concept Masterplan</b></p> <p>Having regard to the above, and in order to support this submission, the Co-op has commissioned the preparation of a Vision Document to illustrate the Site’s potential for a residential-led development. The document provides an assessment of the Site’s constraints and opportunities, informed by a number of sources, including the technical appraisals that accompany this submission, and presents an Illustrative Concept Masterplan to demonstrate how a residential-led development could come forward.</p> <p><i>Primary Masterplan Proposal</i></p> <p>The Primary Concept Masterplan is residential led, with residential properties proposed across the component land parcels across the Site. The proposal incorporates two vehicular access points from Stoughton Road as well as a</p>	<p>Noted.</p> <p>The Local Plan will consider a variety of sites by size and location to determine the best options for delivering the Borough’s housing requirement.</p> <p>All sites received to date via the Call for Sites process in 2020 and 2021 will be taken into account accordingly.</p>



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		<p>third from Gartree Road, in addition to pedestrian and cycle routes across the Site.</p> <p>Utilising a density of 35dph, as set out in Policy 12 of the OWBC Local Plan, the Masterplan provides for approximately 600 dwellings, in addition to part of the site, adjacent to Stoughton Road, being identified for commercial or community use. The proposal also indicates the re-location of the existing private University football pitch to a location in the north of the Site, and to the west of the existing Playing Fields, providing convenient access. Furthermore, the masterplan has adopted a landscape-led approach that retains and enhances the existing field boundaries, utilising the topography of the Site to form SUDs attenuation ponds and providing extensive areas of public open space and green infrastructure, equivalent to approximately 14.2 hectares.</p> <p><i>Variant Options</i></p> <p>The Co-op acknowledge that the easternmost land parcel is currently allocated in the adopted Local Plan as a future cemetery. Notwithstanding this, it has never been developed as such and, through evidence commissioned by the Co-op, which is enclosed with this letter, may not be suitable for such a use given the underlying ground conditions in the area. As such, the Primary Masterplan Option discussed above represents the preferred option for the Site's future development owing to its location adjoining the existing urban area and its sustainability credentials. This is also coupled with</p>	

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		<p>the lack of evidence owing to the need for such a cemetery in the area.</p> <p>Notwithstanding this, should it be demonstrated (via suitable and robust evidence) that justifies the provision of a cemetery in this location, and that the aforementioned ground constraints can be overcome, our Client has prepared two further masterplan variant options of the Concept Masterplan. These are discussed in greater detail below.</p> <p><i>Variant Option 1</i>            Variant Option 1 provides for residential development within the southern parcels, and incorporates a large cemetery area of land to the north-east of the Site. This option also includes the relocation of the existing University football pitch as discussed for the Primary Option. The development indicates two vehicular access points from Stoughton Road, as well as two vehicular access points from Gartree Road, one serving the main residential development with the other serving the proposed cemetery.</p> <p>The proposal again utilises an approximate residential density of 35 dph, providing for approximately 380 dwellings. As with the Primary Option, the development incorporates an area to the west of the site for commercial or community uses.</p> <p><i>Variant Option 2</i></p> <p>Variant Option two sits in between the Primary Option and Variant Option 1 in terms of the development proposed. It</p>	

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		<p>proposes a smaller cemetery area with residential development to the south and west. It proposes the same development densities as the two previous options, as well as the proposed commercial and community uses. The Option could deliver approximately 500 dwellings.</p> <p>Each of the aforementioned Options provide for extensive landscaping and public open space, as well as enhancements to the existing Public Rights of Way which run through the Site, new links to the surrounding footpath network, the potential for the provision of a local commercial or community uses, as well as the re-location of the University football pitch. Access to the development is secured from Gartree Road, at the north of the Site, as well as from Stoughton Road to the west of the Site. The Site would adjoin the existing settlement to the west and south, and would bolster the boundary to the east with new planting, providing a strong, defensible boundary to the settlement and surrounding Green Wedge.</p> <p>As can be seen from this submission, the Co-op's land interest, in combination with that of the University of Leicester, represents an excellent opportunity for a comprehensive, sustainable development, well-connected to the existing settlement that will make a meaningful contribution to meeting the development needs of the Borough as well as providing a multitude of other benefits.</p> <p><i>Benefits to the University of Leicester</i></p>	

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		<p>Notwithstanding the clear benefits the proposal would bring in terms of market and affordable housing, the proposed masterplan also has the potential to offer significant benefits to the University of Leicester through additional investment and improved facilities. In order to justify this point, this submission is also accompanied by a Position Statement from the University. This confirms that existing facilities, which were constructed in the early 1990's, are no longer fit for purpose and in need of investment to secure their future. The University also confirm that the development of their land as indicated within this submission will bring forward opportunities to improve said facilities, which would otherwise be challenging without the capital investment that the development would facilitate.</p> <p>As such, the proposed development presents an opportunity to deliver significant benefits for the University, its students and the wider community, over and above the clear benefits of delivering much needed housing.</p>	
Barton Willmore (now Stantec) on behalf of The Co-operative Group	28 <sup>th</sup> October 2021	<p><b>Regulation 18 Issues and Options Consultation</b></p> <p><b>Part 2 – Overarching Policy Areas (Strategic Challenges)</b></p> <p><b><i>Is the suggested Local Plan time period of 'date of adoption to the year 2041' appropriate?</i></b></p> <p>We note at paragraphs 4.5 and 4.6 of the Issues and Options Document (the "I&amp;O Document") that the new Local Plan will cover a period up to 2041, with adoption of the Plan</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>

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		<p>anticipated for 2023, thus resulting in a Plan period of 18 years. This is considered to be technically sufficient in order to align with the provisions of Paragraph 22 of the National Planning Policy Framework 2021 (NPPF), which sets out that Plans should look ahead over a minimum 15 year period from adoption.</p> <p>Notwithstanding this, however, it is noted that the current Plan covers a period up to 2031, and so the new Local Plan would only cover an additional 10 years beyond that already planned for. The document also confirms that the Evidence for the new Local Plan will be prepared on the basis of a Plan period to 2041.</p> <p>This being the case, our Client considers that it would be pertinent to consider an extension to the Plan period, to a minimum of 2046, in order to ensure that it will Plan for at least an additional 15 years beyond that already planned for. This would provide greater clarity and certainty on how the Borough's future development needs will be met and the locations where significant development will be delivered. It is also important to acknowledge that, within the updates to the NPPF in June 2021, paragraph 22 was updated to include the following text:</p> <p><i>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 within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.</i></p>	

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		<p>Whilst it may not be necessary to cover a 30-year period for Oadby and Wigston, the updated text above clearly highlights the emphasis the Government is placing on long-term clarity in relation to future, large scale developments.</p> <p>In addition to the above, our Client welcomes the Council's recognition that whilst brownfield land is a focus for development, there will come a point where greenfield land is required, noting that the development needs of the Borough will not be met through urban regeneration alone. This highlights the need for sustainable, large-scale greenfield sites to be allocated for development as part of the new Local Plan, and our Client remains firmly of the view that their land interest at Gartree Road and Stoughton Road (incorporating the University land), is a wholly appropriate location for future housing development.</p>	
Barton Willmore (now Stantec) on behalf of The Co-operative Group	28 <sup>th</sup> October 2021	<p><b>Part 3 – Housing (Strategic Challenges)</b></p> <p><b><i>Is there any robust evidence to suggest that the Council should continue to use the current housing requirement of 148 new homes per year set out within the current Local Plan?</i></b></p> <p>No. Whilst it is apparent that the Council considers it has sufficient land available to deliver 148 new homes per annum, the prevailing indication is that the Housing and Employment Needs Assessment (HENA), which is yet to be published, will indicate that at least an approximate 22% uplift in the housing</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, Policy and Guidance.</p> <p>The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take place.</p> <p>The specific recommendations will be taken into</p>

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		<p>requirement is necessary (based upon the Standard Methodology as set out within the Council’s consultation document). The Council also states that the delivery of housing in the Borough is a “consistent challenge” owing to the compact nature of the Borough, suggesting that even if the Council was to maintain its current housing requirement, greenfield land would likely be required to sustain this level of growth, owing to the finite nature of brownfield land within the Borough.</p> <p>In addition, there are no environmental or infrastructure constraints that would prevent the Council from meeting an increased housing requirement by releasing further greenfield land, including land currently in the Green Wedge and Open Countryside, over the new Plan period.</p>	<p>consideration as the preparation of the emerging new Local Plan document continues to progress. For example, the Council is currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will also inform policies related to housing.</p>
<p>Barton Willmore (now Stantec) on behalf of The Co-operative Group</p>	<p>28<sup>th</sup> October 2021</p>	<p><b><i>Should the Council use the housing need figure of 180 new homes per year calculated by the Standard Method?</i></b></p> <p>Paragraph 60 of the NPPF indicates that, to determine the number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the Standard Method, unless there are exceptional circumstances that justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. Therefore, the Standard Method requirement is to be treated as a starting point, and that the requirement should</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, Policy and Guidance.</p> <p>The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take place.</p> <p>The specific recommendations will be taken into consideration as the preparation of the emerging new Local Plan document continues to progress.</p>

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		<p>also consider the unmet need of neighbouring authorities, including the City of Leicester.</p> <p>Further clarity on this will be provided following the publication of the HENA. It is clear however that, even an uplift to 180 dwellings per annum will necessitate the release of greenfield land in sustainable locations citing the “constant challenge” the Council readily accepts in delivering the current, lower requirement.</p>	<p>For example, the Council is currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will also inform policies related to housing.</p>
<p>Barton Willmore (now Stantec) on behalf of The Co-operative Group</p>	<p>28<sup>th</sup> October 2021</p>	<p><b><i>What should the Council do if the HENA outcomes suggests that there should be a diversion from the Standard Method?</i></b></p> <p>As stated above, the NPPF indicates that the level of housing need should be informed by a local housing needs assessment. The HENA, which is currently being prepared, is considered to represent such an assessment. Whilst the early indications are that the findings of the HENA will align with the Standard Method figure of 180 dwellings per annum, it has not yet been published, and so its findings cannot be pre-judged. If however, it transpires that a different level of need is appropriate and sound, also having regard to the unmet need of neighbouring authorities, other demographic trends or market signals, then the Council would need to be satisfied that these represent the exceptional circumstances required to justify any deviation from the Standard Method. In our opinion, the Borough is not faced with any significant environmental or infrastructure constraints that are so severe as to justify a lower growth figure and the resultant significant harm that</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by</p>



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		would arise from failing to meet market and affordable housing needs. Such harm would impact greatly upon the Borough's residents and upon its economy.	doing so, these discussions can begin to take shape.
Barton Willmore (now Stantec) on behalf of The Co-operative Group	28 <sup>th</sup> October 2021	<p><b><i>Should the Borough area be taking any of Leicester City's declared unmet housing need?</i></b></p> <p>Our Client acknowledges that Oadby and Wigston is a compact borough, and recognises the challenges that it faces in meeting its own development needs within existing settlement boundaries. It is important to note, however, that Leicester also faces significant and greater challenges in meeting its housing needs and faces similar challenges in delivering the level of housing it requires, albeit the extent of this is much greater owing to it being a major city and a focus for growth and the absence of an ability to turn to significant areas of undeveloped greenfield land on the edge of the existing settlement. The related housing need, and in particular affordable housing needs, do not disappear, however. Therefore, this being the case it is important that all of the Leicestershire Boroughs play their part in assisting Leicester and so our Client considers that Oadby should assist in meeting the unmet need, at least to a degree.</p> <p>It is noted that a Statement of Common Ground is currently being prepared to establish how the unmet need will be met and where; although this is yet to be published. It is essential that this be published as soon as possible to ensure that the Plan is reactive to this, and to provide greater clarity and certainty that the need will be met. It is noted that Oadby and</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>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.</p>

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		<p>Wigston has a functional relationship with the City of Leicester, more so than some of the other Leicestershire Boroughs, and so Oadby and Wigston may be better placed to absorb a proportionate level of this need than other Boroughs, for example Harborough.</p> <p>In releasing sustainable and suitable greenfield sites for development, the Borough can ensure that it can meet its own increasing housing need, whilst also assisting Leicester City's unmet need.</p>	
<p>Barton Willmore (now Stantec) on behalf of The Co-operative Group</p>	<p>28<sup>th</sup> October 2021</p>	<p><b><i>Should the Council 'roll forward' the current Local Plan policy relating to housing density ensuring that it is up-to-date with national policy and guidance?</i></b></p> <p>Our Client recognises the Council's success on achieving development which meets the minimum density targets in the Borough, and considers that rolling-forward this requirement should allow this success to continue. Notwithstanding this, and as stated above, the Council is facing an uplift in housing requirement of approximately 22% and already admits challenges in meeting its existing, lower housing requirement.</p> <p>The Council would need to ensure that any increase in density would accord with the prevailing character of the area within which a development site lies, and so suitable caveats may be required in this respect; but it is recognised that there are a number of substantial properties in very large plots across the Borough, and so new development could not realistically be expected to mirror this.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p>

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Barton Willmore (now Stantec) on behalf of The Co-operative Group	28 <sup>th</sup> October 2021	<p><b>Part 6 – Green Infrastructure (Strategic Challenges)</b></p> <p><b><i>Do you think that the Council should maintain the current Local Plan policy position relating to Green Infrastructure, in the new Local Plan, with minor wording amendments to ensure that it is up-to-date with current national planning policy and guidance?</i></b></p> <p>Our Client notes that the approach outlined within the question above is the only option that the Council is considering in respect of Green Infrastructure. Our Client does not object to this but would request that any future policy in respect of Green Infrastructure is worded such that it provides for a balancing exercise to ensure that any impacts on Green Infrastructure are weighed against the benefits of a scheme. Set against the context of uplifted housing needs and existing challenges in finding sufficient land, it is important that the Council does not have its “hands tied” when considering the provision of new development on greenfield sites across the Borough.</p>	<p>Noted.</p> <p>The recommendation to review and consider the wording of the Green Infrastructure Policy carefully is noted and will be given consideration in due course.</p>
Barton Willmore (now Stantec) on behalf of The Co-operative Group	28 <sup>th</sup> October 2021	<p><b><i>Should the Council ‘roll forward’ the current Local Plan policy relating to Green Wedges with minor wording amendments to ensure that it is up-to-date with current national planning policy and guidance?</i></b></p> <p>The Borough’s Green wedges derive from a County-wide designation dating back to 1987. They are not explicitly detailed within the NPPF but, in the Council’s view, fall within</p>	<p>Noted.</p> <p>The Council will test various options during the course of preparing the Local Plan. A review of Green Wedges will be undertaken in the course of preparing the emerging new Local Plan.</p>

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		<p>the provisions of paragraph 20 of the NPPF, which states that strategic policies should set out an overall strategy for the pattern, scale and quality of development and make provision for a number of matters, including 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.</p> <p>Whilst our Client does not object to the overall objectives of the Green Wedge, they consider that the Green Wedges should be considered in the context of other material factors, including a pressing need for housing land across the Borough. To that end, our Client welcomes the proposed review of the Green Wedge as indicated at paragraph 4.16 of Part 6 of the I&amp;O Document. It is important that, in the context of finding additional housing land, in a Borough which readily accepts that finding sufficient land is a challenge, any Green Wedge policy should provide a mechanism for development on Green Wedge land where it fails to perform an adequate function as such, or where there are other material factors that would justify development within the Green Wedge.</p> <p>Notwithstanding the above, it is important to be mindful however that the Green Wedges do not have the permanence of Green Belt designations, and so should be reviewed in the preparation of new local plans, to foster the ability to respond to local development needs.</p>	

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Barton Willmore (now Stantec) on behalf of The Co-operative Group	28 <sup>th</sup> October 2021	<p><b><i>Should the Council consider whether or not to undertake a Green Wedge Review in order to establish whether or not to retain, create new or amend the boundaries of the existing Green Wedges in order to take account of the new Local Plan proposed site allocations and any other factual updates?</i></b></p> <p>Yes. As stated previously, initial findings indicate that the Council will face an uplift in housing requirement of at least 22% and that finding sufficient land to deliver the current, lower, housing requirement remains challenging owing to the constraints of the Borough.</p> <p>The Green Wedge designations clearly provide an important role given the compact nature of the Borough, as is set out by the Council within the I&amp;O Document. Our Client notes that the Council states that it will continue to maintain the Green Wedge designations within the Borough area through retaining related planning policy set out in the new Local Plan. This does not however preclude a review of the existing Green Wedge boundaries, as is indicated within the I&amp;O Document. It follows therefore, that given the need to identify greenfield sites for development in order to address the Borough's growing housing needs, that sites which are found to perform poorly as Green Wedge and/or fail to provide the prescribed functions (set out in Local Plan policy 42), that land and sites should be considered for release from the Green Wedge, and allocated for development. Policy designations must be supported by a robust evidence base, therefore where land</p>	<p>Noted.</p> <p>The Council will test various options during the course of preparing the Local Plan. A review of Green Wedges will be undertaken in the course of preparing the emerging new Local Plan. Therefore, this representation and the supporting submissions will be taken into account by the Council when reviewing the current Green Wedge Review.</p>

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		<p>does not clearly perform a function of the designation, that designation should be removed.</p> <p>As set out above, our Client considers that the land south of Gartree Road and east of Stoughton Road performs poorly as an area of Green Wedge and does not make a meaningful contribution to its purposes as set out in Policy 42. As such it is not considered to warrant such a designation and, given the material benefits that the development of the Site could bring, including the significant contribution to meeting the Borough's housing needs, the Site would be suitable for removal from the Green Wedge and allocated for residential development.</p> <p>This being the case, our Client fully supports the Council's intention to undertake a review of the Green Wedge.</p>	
Barton Willmore (now Stantec) on behalf of The Co-operative Group	28 <sup>th</sup> October 2021	<p><b>Part 9 – Housing (Local Challenges)</b></p> <p><b><i>Do you consider that 'First Homes' will be of genuine benefit to the local communities within the Borough area?</i></b></p> <p>Yes. Our Client recognises that, in broad terms, Oadby and Wigston is an affluent Borough. Particularly with regard to Oadby, it is clear that a provision of First Homes and affordable homes will allow local first-time buyers to remain local, where they may not otherwise be able to afford a home in Oadby. Our Client also recognises, however, that such provision can often impact upon development viability, and so it is important to ensure that any policy provision in this respect provides suitable flexibility should scheme viability become a</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing and in particular affordable housing, (including 'First Homes').</p> <p>In particular, evidence will indicate whether current levels of affordable housing are still appropriate.</p>

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		<p>concern (demonstrated through evidence). It is clear however that the larger developments are often better placed to deliver affordable homes and the provision of such is fully supported by our Client.</p> <p>In addition, our Client notes that the development of their land interest at Gartree Road and Stoughton Road, which will deliver a significant number of dwellings, will also, as part of the development, provide a significant number of affordable dwellings, this being a significant benefit of the scheme, heightened by the affluence of the area and the need for affordable homes in this location.</p>	
Barton Willmore (now Stantec) on behalf of The Co-operative Group	28 <sup>th</sup> October 2021	<p><b><i>Should the Council ‘roll forward’ the current policy approach set out in Local Plan Policy 14 – Self Build and Custom Build, ensuring that it is up to date with current national planning policy and guidance?</i></b></p> <p>Our Client is content with the Council’s intention to roll-forward Local Plan Policy 14, but considers it important that the policy retains suitable flexibility in the delivery of self-build housing, should site-specific matters arise that preclude its delivery. This approach was deemed to be sound by the Inspector who presided over the Examination of the adopted Local Plan.</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing. This will include measuring the demand for self-build and custom build in the Borough and how any needs determined can best be enabled within the Borough.</p>
Barton Willmore (now Stantec) on behalf of The Co-operative	28 <sup>th</sup> October 2021	<p>Which of the above potential options [sustainable home requirements] do you consider to be the most appropriate? Our Client recognises and supports the need for sustainable homes, as well as the need for them to incorporate suitable infrastructure for the future. Indeed, our client is also</p>	Noted.

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Group		<p>supportive of the potential sustainability measures which have been mooted within the I&amp;O Document. These being:</p> <ul style="list-style-type: none"> <li>• Solar photovoltaic energy producing technology</li> <li>• Electric vehicle charging points</li> <li>• Ground and / or air source heat pumps</li> <li>• Wind energy producing technology</li> <li>• Water energy producing technology</li> <li>• Grey water recycling</li> </ul> <p>Our Client considers that all of the above measures have a role to play in the delivery of sustainable homes, but it is important to recognise that not all measures will be appropriate or necessary for all sites. A suitable assessment at the planning application stage will reveal how best a site can deliver sustainable design.</p>	
Barton Willmore (now Stantec) on behalf of The Co-operative Group	28 <sup>th</sup> October 2021	<p><b>Part 10 – Design and Character (Local Challenges)</b></p> <p><b><i>Should the Council be producing a criteria based policy, and if so, what criteria / design principles should be included?</i></b></p> <p>Our Client has no specific objection to the incorporation of a criteria based policy within the Local Plan, although they would urge caution as to the level of detail specified within the Policy. Any criteria-based policy would need to be carefully worded so as to not be over-prescriptive. This has the potential to impact on the viability of otherwise acceptable schemes but also can have the potential to stifle creativity. It may hinder a</p>	<p>Noted.</p> <p>The Council is currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to design and character.</p> <p>The recommendation to review and consider the inclusion of a criteria-based Policy carefully is noted and will be given consideration in due course.</p>



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		<p>development’s ability to be locally distinctive or to incorporate modern design. It is important therefore that any policy, whilst setting out broad criteria for developments to achieve, should also be sufficiently flexible, both to account for any limitations influenced by scheme viability but also give developers confidence to “push the envelope” where appropriate, to foster high quality, distinctive development.</p> <p>The above response also applies to the questions posed within the I&amp;O Document in respect of Design Codes.</p>	
<p>Barton Willmore (now Stantec) on behalf of The Co-operative Group</p>	<p>28<sup>th</sup> October 2021</p>	<p><b><i>Should all new development be required to make use of the highest quality methods of construction and use the highest quality materials, and seek to refuse development proposals that do not provide this.</i></b></p> <p>As above, our Client welcomes the Council’s intention to seek development of the highest quality, and does not object to the principle of all new developments being required to provide high quality materials. It is important to ensure that any policy requirements in this regard are not overly prescriptive so as to stifle development viability. We would recommend that any policy incorporate suitable caveats to ensure that otherwise acceptable developments are not precluded from coming forward as a result of overly stringent material requests.</p> <p>The Council should also be wary of using policy terms that could be lost in translation. For example, before referring to the need to use the ‘highest quality materials’, it should ask itself what this actually means and how will this be expressed</p>	<p>Noted.</p> <p>The Council is currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to design.</p> <p>The recommendation to review and consider the wording in relation to the Council seeking ‘highest quality materials’ is noted and will be given consideration in due course.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p>either in the policy or within its supporting text? How will the Council determine what the highest quality materials or methods of construction are? We advise that the Council consults with the development industry in relation to such matters before determining whether to pursue such a policy.</p>	
<p>Barton Willmore (now Stantec) on behalf of The Co-operative Group</p>	<p>28<sup>th</sup> October 2021</p>	<p><b>Part 13 - Local Services (Local Challenges)</b></p> <p><b>Should the Council ‘roll forward’ the current Local Plan policy relating to the Oadby Cemetery Allocation with wording amendments to ensure that it is up-to-date with current national planning policy and guidance?</b></p> <p><b><i>Should the Council remove the current Local Plan policy relating to the Oadby Cemetery Allocation?</i></b></p> <p><b><i>Do you consider that the Council should be allocating land for cemetery and / or burial space in the new Local Plan?</i></b></p> <p>Our Client’s combined response to these questions is set out below.</p> <p>As identified previously, part of our Client’s land interest at Oadby is currently allocated within the adopted Local Plan as a cemetery; although, to date, no such use, or a planning application to facilitate such a use, has been brought forward on the land. We also note that there is no evidence to support the existing allocation within the adopted Local Plan evidence base – either in terms of need or location. As part of our</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery.</p> <p>The Council will also review all existing designations, including Cemetery designations that are incorporated within Green Wedges, as part of the emerging Local Plan and evidence base production.</p>

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		<p>Client's earlier representations to the Plan, in November 2020, it was identified (and supported by evidence) that site investigations have revealed that due to the presence of shallow groundwater, the northern parcel of the Site is unlikely to be suitable to serve as a cemetery and there is no realistic or viable solution that would remedy this position. Accordingly, it may not be possible for the Site to be used as a cemetery in accordance with the current Local Plan allocation.</p> <p>On this basis, our Client remains of the view that the land should not remain allocated for cemetery use if it is neither suitable or needed in this location. It is noted however that, in allocating the Site as a cemetery, the Council accept that the Site is suitable for some development, and so, in the context of the pressing housing need detailed above, our Client considers that the Site would represent an appropriate candidate for allocation for residential development. The WSP document, submitted in support of our Client's land promotion, makes clear that the ground conditions which cast a doubt over the potential for a cemetery use do not prevent its development for housing.</p> <p>On the basis of the information currently available, in order for the retention of a cemetery allocation in the existing location in the new Local Plan to be sound, the Council must demonstrate through robust evidence that there is a need for a new cemetery location of the scale proposed, and that there are no suitable locations elsewhere having regard to its intended catchment. Furthermore, the Council must also demonstrate that the prevailing ground conditions at the site are suitable for</p>	

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		<p>cemetery use, having regard to the evidence that our Client has made available to date. If the Council is able to provide the necessary evidence, we draw attention to the potential variant options for delivering a cemetery on the Co-op's land set out within the enclosed Vision Document.</p>	
Blaby District Council (BDC)	28 <sup>th</sup> October 2021	<p>Blaby District Council welcomes the opportunity to comment on the emerging new Local Plan for the Borough of Oadby and Wigston. We recognise the challenges faced in preparing a new Local Plan in the current climate; with the difficulties of not only a global pandemic, but an unknown planning system future, to contend with.</p> <p>It is positive to see high regard given to matters such as climate change and infrastructure provision to name a few. We look forward to working with Oadby and Wigston Borough Council as the plan progresses.</p> <p>We set out below the sections of the Issues and Options document that the Council has specific comments on, a brief overview of the issue, and the response.</p>	<p>Noted.</p> <p>The Council would like to thank Blaby District Council for taking time to read through the consultation document and for responding.</p>
Blaby District Council (BDC)	28 <sup>th</sup> October 2021	<p><b>Overarching Policy Areas</b></p> <p>It is proposed that the new Local Plan has a Plan period that runs up to the year 2041 to ensure at least a 15 year lifespan and potential for clarity over a longer time period.</p> <p>The Borough Council indicates that it will engage with all Leicester and Leicestershire local authorities (including</p>	<p>Noted.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p>Leicestershire County Council), in particular, its direct neighbours of Leicester City, Blaby District and Harborough District. Under the Duty to Cooperate, the Council will cooperate with all relevant stakeholders and will produce a number of Statements of Common Ground that will be signed off by all relevant partner organisations.</p> <p>The Borough Council is considering the following options in terms of where new development should be located:</p> <ul style="list-style-type: none"> <li>• Concentrating new development within the existing urban areas, particularly the town and district centres, until such land has been fully utilised, only then will greenfield land be used for development.</li> <li>• Focusing new development towards the greenfield areas of the Borough only.</li> <li>• Taking a balanced approach to the location of new development with a mix of urban development and greenfield land development.</li> </ul> <p><i>BDC Comments: The preferred approach to the overarching policy areas is reasonable subject to the comments made in relation to the scale of growth for housing and employment. The approach to joint working with the Leicester and Leicestershire local authorities is supported.</i></p>	
Blaby District Council (BDC)	28 <sup>th</sup> October 2021	<p><b>Sites</b></p> <p>Paragraphs 4.14 to 4.16 indicate that the Borough Council carried out a 'Call for Sites' exercise in 2020. A number of</p>	<p>Noted.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p>sites were submitted, and these will help the Council to identify potential sites for consideration for development, through the production of the new Local Plan. Details of the sites and some initial assessment can be found on the Borough Council's website.</p> <p><i>BDC Comments: Some sites may have cross boundary implications even if the specific sites do not cross boundaries, particularly in relation to transport infrastructure but also other infrastructure such as schools and healthcare. Blaby District is in the early stages of preparing a new Local Plan and has made no decisions about the locational strategy or site options to be included in its Local Plan. Where there are cross boundary sites a comprehensive approach should be taken. Blaby District strongly encourage a dialogue to explore such sites so that any impacts can be fully assessed, and any future masterplan properly considers the cross boundary impacts.</i></p>	<p>local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>The Council will also undertake evidence gathering in terms of infrastructure and transport at a strategic and local level and the findings of these studies (and all evidence base) will inform policies related to housing and new development, including that related to the consideration and assessment of specific sites put forward for new growth opportunities.</p> <p>As part of this work, the Council has already begun and will continue to regularly engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions will continue to take shape.</p> <p>For example, Local planning authorities (including Blaby District Council, BDC) 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.</p>
Blaby District Council (BDC)	28 <sup>th</sup> October 2021	<b>Strategic Housing Need</b>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p>Paragraphs 4.3 and 4.4 of the document confirms that Leicester and Leicestershire local planning authorities are working collaboratively to plan for long term housing needs of the Leicester &amp; Leicestershire Housing Market Area (HMA). In particular, it notes that Leicester City Council has indicated that it will be unable to deliver its full housing need. All local authorities within Leicester and Leicestershire are working together to produce a Statement of Common Ground that will address the issue of Leicester City’s unmet need.</p> <p>The Borough Council state that “Due to the nature of the Borough area, it is not expected that any of Leicester City’s unmet need could be provided within the Borough area, however this has yet to be determined”. This statement is later explained that due to the urban compact nature of the Borough, it is a consistent challenge for the Council to provide sufficient housing to meet local community needs.</p> <p><i>BDC Comments: The Borough of Oadby and Wigston Council are aware that a number of strategic evidence based studies are being prepared to inform a Leicester and Leicestershire wide Statement of Common Ground to consider the distribution of Leicester’s unmet housing and employment land need. The SOCG is due to be signed by all the Local Planning Authorities in Leicester and Leicestershire. This work recognises the potential significant uplift in Leicester’s unmet housing need as a result of the Government’s announcement on the standard methodology in December 2020.</i></p>	<p>with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<i>The Borough of Oadby and Wigston Council will be aware that this work will inform whether or not the Borough is expected to make provision for a portion of Leicester’s unmet housing need.</i>	
Blaby District Council (BDC)	28 <sup>th</sup> October 2021	<p><b>Employment Land Growth</b>            Paragraphs 4.3, 4.4 and 4.8 recognise the need for local planning authorities to work collaboratively in terms of planning for economic growth across Leicester and Leicestershire. In particular, paragraph 4 indicates that a Statement of Common Ground is being prepared to address the issue of Leicester City’s unmet employment land need.</p> <p>However, the Borough Council state that “Due to the nature of the Borough area, it is not expected that any of Leicester City’s unmet need could be provided within the Borough area, however this has yet to be determined.”</p> <p>Paragraph 4.6 indicates that over recent years, the Borough has not seen significant demand for large scale or strategic employment growth. Paragraph 4.8 recognises that a Leicester and Leicestershire wide evidence study is being carried out to inform the scale of future employment land needs.</p> <p><i>BDC Comments: The Borough Council recognises the need to work with other local planning authorities in Leicester and Leicestershire in terms of meeting Leicester’s unmet employment land need. The Council is aware that a number of strategic evidence based studies are being prepared to inform a Leicester and Leicestershire wide Statement of Common</i></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p>



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		<p><i>Ground to consider the distribution of Leicester's unmet housing and employment land need. The SOCG is due to be signed by all the Local Planning Authorities in Leicester and Leicestershire.</i></p> <p><i>The Borough of Oadby and Wigston Council will be aware that this work will inform whether or not the Borough is expected to make provision for a portion of Leicester's unmet employment land need.</i></p>	
Blaby District Council (BDC)	28 <sup>th</sup> October 2021	<p><b>Joint Evidence Base</b></p> <p>There are sections within the documents on the economy, green infrastructure, environment and sustainability and infrastructure. These identify potential evidence studies to inform the Local Plan in terms of:</p> <ul style="list-style-type: none"> <li>• Retail need and hierarchy</li> <li>• Habitats and biodiversity</li> <li>• Climate change</li> <li>• Infrastructure.</li> </ul> <p><i>BDC Comments: These are areas where joint working on the evidence base would be beneficial in terms of informing cross boundary strategic matters and cost sharing. BDC encourages a dialogue to explore joint working on these strategic matters and other matters as appropriate.</i></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p>

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<b>Name of person / body submitting comment</b>	<b>Date on which comment was received</b>	<b>Comment received</b>	<b>Officer response to comment received</b>
Blaby Parish Council	15 <sup>th</sup> September 2021	Thank you for your letter dated the 3rd September 2021 with regards to the Planning Policy Public Consultation, I can confirm that Blay Parish Council do not have any comments to make on this document.	Noted.  The Council would like to thank Blaby Parish Council for taking time to read through the consultation document and for responding.

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<p>CCG - Leicester, Leicestershire and Rutland Clinical Commissioning Group (LLR CCG)</p>	<p>28<sup>th</sup> October 2021</p>	<p>The LLR CCGs are supportive of the vision set out in the plan and would want to work collectively with you to understand in more detail how the local NHS can contribute to its delivery. Many of the themes identified in the plan will impact upon the wider determinants of health and as a result population health outcomes. We would therefore welcome working together to maximise opportunities to improve the health and wellbeing of the population.</p> <p>We would welcome:</p> <ul style="list-style-type: none"> <li>• Actions to support the development of community identity; maximising opportunities for residents to come together to create community cohesion and support each other.</li> <li>• Sufficient green space and local recreational facilities that enable residents to access physical activity with ease.</li> <li>• That new developments are designed in such a way to enhance physical and mental health and wellbeing.</li> <li>• Designs that support the reduction in carbon emissions, as this has a direct impact on some resident's health</li> </ul> <p>As well as the above generic comments it is 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> <p>As a catch all we would seek to apply for s106 contributions for all developments within your borough to maximise opportunities to expand Primary Care services to support the population growth. We will continue to work collaboratively with yourselves via our quarterly meetings to plan and support the impacts across the district due to housing growth.</p>	<p>Noted.</p> <p>The Council would like to thank LLR CCG for taking time to read through the consultation document and for responding to the consultation.</p> <p>As the emerging new Local Plan continues to be prepared, the Council will continue to regularly engage with LLR CCG to ensure that all infrastructure supply and demand needs are taken into consideration and where necessary, are taken into account as part of emerging relevant Policy, infrastructure delivery evidence, and supporting guidance.</p>
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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
DLP Planning Limited on behalf of Bowbridge Land Ltd	12 <sup>th</sup> November 2021	Bowbridge Land Ltd welcomes the opportunity to be involved in the creation of policies that will form part of the New Local Plan.	Noted.  The Council would like to thank DLP Planning Limited for taking time to read through the consultation document and for responding to the consultation on behalf of Bowbridge Land Ltd.
DLP Planning Limited on behalf of Bowbridge Land Ltd	12 <sup>th</sup> November 2021	<p><b>Background</b></p> <p>By way of background, Bowbridge Land Ltd has an interest in the land to the north of the Cottage Farm Direction of Growth Area (as allocated in Policy 21 of the current adopted Local Plan (2019)).</p> <p>The land does not benefit from direct frontage access to the adopted highway network, being bound on its northern border by existing residential properties and Brocks Hill Primary and Gartree High School, its eastern most point by Coombe Park recreational grounds, its southern boundary by agricultural fields and land forming part of the Cottage Farm Direction of Growth Area and its western boundary also by agricultural fields.</p> <p>As part of the Council's previous Local Plan preparation process, this land was promoted for residential development through a Call for Sites submission, however, was discounted by the Council due to there being no formalised access arrangements and a lack of clarity over deliverability of a site access, despite it scoring better than many other proposed allocations.</p>	Noted.  The Local Plan will consider a variety of sites by size and location to determine the best options for delivering the Borough's housing requirement.  All sites received to date via the Call for Sites process in 2020 and 2021 will be taken into account accordingly.

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		<p>Representations were subsequently made to the Main Modifications consultation in respect of the now adopted Local Plan. As part of these representations, a transport technical note was submitted, demonstrating that there is in-principal agreement to achieve an appropriate single point of access via Sutton Close, but that there is also capacity to provide an access via land at Cottage Farm, utilising the new access junction on the A6 Glen Road. The incorporation of this later access would assist in the delivery of the site for residential development and provide greater flexibility in terms of the form and scale of development proposed.</p> <p>Notwithstanding this, the site was not included as a housing allocation in the now adopted Local Plan, nor was it removed from the Green Wedge.</p> <p>Further to this, the site was promoted for residential development through the Council's most recent Call for Sites process (September/November 2020), and a virtual meeting to discuss the site submission was held between DLP Planning Ltd and the Council on 19 March 2021. The Council published its Call for Sites: Site Collation and Initial Assessment in Spring 2021 and this confirms that <i>"the site will be assessed further through the Local Plan process. However, in order for the Council to fully determine the sites capacity in the future, more certainty over the access arrangement(s) for the site will be required."</i></p>	

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		<p>These representations provide comment in relation to the various issues and options proposed within the consultation document relating to housing strategies, and also provide an update on the current position in relation to the land to the north of the Cottage Farm Direction of Growth Area including detail about certainty over the access arrangements.</p>	
<p>DLP Planning Limited on behalf of Bowbridge Land Ltd</p>	<p>12<sup>th</sup> November 2021</p>	<p><b>Representations on the Issues and Options</b></p> <p><b>Overarching Policy Areas (Strategic Challenges)</b></p> <p><b><i>Question: Which of the proposed options illustrated above should be used in determining the location of new development within the Borough area?</i></b></p> <p>The Council sets out three options for determining the location of new development in the Borough; (1) concentrate new development within the existing urban areas and until such land has been fully utilised, only then will greenfield land be used for development; (2) focus new development towards the greenfield areas of the Borough only; or (3) take a balanced approach with a mix of urban and greenfield land development.</p> <p>Bowbridge Land Ltd recognises the need for development within the existing urban areas, but notes that appropriate incremental suburban/rural development is also required. These priorities will ensure a broad range of sites in terms of the location and types of dwelling are provided, ensuring the needs of the different sectors of the population are met. As</p>	<p>Noted.</p>

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		<p>such, the Council should take a balanced approach to development, with a mix of urban and greenfield land development.</p> <p>Development of sites in suburban greenfield locations has the potential to utilise sustainable and well connected plots on the edge of existing settlements to meet the housing requirements for families. This type of land is often available for development in a timely manner and as such can help to contribute towards the Council's immediate housing need. It is therefore important that deliverable greenfield sites such as the land to the north of the Cottage Farm Direction of Growth Area are included in the Local Plan strategy, alongside urban development sites.</p>	
DLP Planning Limited on behalf of Bowbridge Land Ltd	12 <sup>th</sup> November 2021	<p><b>Housing (Strategic Challenges)</b></p> <p><b><i>Question: Is there any robust evidence to suggest that the Council should continue to use the current housing requirement of 148 new homes per year set out within the current Local Plan?</i></b></p> <p>There is no robust evidence to suggest that the Council should continue to use the current housing requirement figure of 148 new homes per annum as set out in the adopted Local Plan. As confirmed in the National Planning Policy Framework (NPPF, 2021), 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</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping</p>

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		<p>can be met over the plan period (paragraph 66). The determination of the minimum number of homes needed should be informed by a Local Housing Needs (LHN) assessment using the Government’s standard methodology unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals (paragraph 61).</p>	<p>to inform policies related to all aspects of the Plan.</p>
<p>DLP Planning Limited on behalf of Bowbridge Land Ltd</p>	<p>12<sup>th</sup> November 2021</p>	<p><b>Question: Should the Council use the housing need figure of 180 new homes per year calculated by the Standard Method?</b></p> <p>As outlined above, the NPPF expects strategic policy-making authorities to follow the standard method in this guidance for assessing LHN (paragraph 61). Further, the National Planning Practice Guidance (NPPG) confirms that there is an expectation that the standard method will be used, and that any other method will be used only in exceptional circumstances (Paragraph: 003 Reference ID: 2a-003-20190220).</p> <p>The NPPG sets out the standard methodology for calculating LHN using demographic data (based on 2014 MHCLG Sub National Household Projections (SNHP)), an affordability adjustment (based on the latest ONS affordability ratios) and a Cities &amp; Urban Centres uplift of 35% (Paragraph: 004 Reference ID: 2a-004-20201216). Using the standard methodology, the minimum LHN for Oadby &amp; Wigston is 180 dwellings per annum based on 2014 SNHP, 2021 as the current year and 2020 affordability ratio of 9.35. As set out in</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p> <p>The Council is currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will also inform policies related to housing.</p>



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		<p>the NPPG, the LHN is calculated at the start of the plan-making process, but this number should be kept under review and when appropriate revised until the Local Plan is submitted for examination (Paragraph: 008 Reference ID: 2a-008-20190220). The minimum LHN may change as inputs are variable.</p>	
<p>DLP Planning Limited on behalf of Bowbridge Land Ltd</p>	<p>12<sup>th</sup> November 2021</p>	<p><b>Question: What should the Council do if the HENA outcomes suggests that there should be a diversion from the Standard Method?</b></p> <p>The NPPG confirms that the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates (Paragraph: 010 Reference ID: 2a-010-20201216).</p> <p>As set out in the NPPG (Paragraph: 010 Reference ID: 2a-010-20201216), circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:</p> <ul style="list-style-type: none"> <li>• Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);</li> </ul>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>

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		<ul style="list-style-type: none"> <li>• Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or</li> <li>• An authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.</li> </ul> <p>On this basis, when preparing the Housing and Economic Needs Assessment (HENA), the Council should consider whether such circumstances, as listed above, exist.</p>	
DLP Planning Limited on behalf of Bowbridge Land Ltd	12 <sup>th</sup> November 2021	<p><b><i>Question: Should the Borough area be taking any of Leicester City's declared unmet housing need?</i></b></p> <p>The Council should be working collaboratively with other Leicester &amp; Leicestershire Housing Market Area (L&amp;LHMA) authorities to meet Leicester's unmet housing need. As noted above, paragraph 66 of the NPPF confirms strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need <u>and any needs that cannot be met within neighbouring areas can be met over the plan period</u> (DLP emphasis).</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>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.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
DLP Planning Limited on behalf of Bowbridge Land Ltd	12 <sup>th</sup> November 2021	<p><b><i>Question: Should the Council ‘roll forward’ the current Local Plan policy relating to housing density ensuring that it is up-to-date with national policy and guidance?</i></b></p> <p>Adopted Policy 12 sets out varying approaches to density across the Borough; within the town centre density should be at least 50 dwellings per hectare (dph); outside of the town centre, but within the Leicester PUA it should be at least 40 dph; and elsewhere it should be at least 30 dph.</p> <p>To note, paragraph 125 of the NPPF confirms that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. It goes on to confirm that in these circumstances, (a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible; (b) it may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and (c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework.</p> <p>Whilst the current approach appears sensible as it will allow the creation of mixed and balanced communities, if there is an existing or anticipated shortage of land for meeting identified housing needs, then in accordance with the NPPF these density targets should be reviewed. Further, it is important that</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council’s Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p>

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		<p>local planning policy is not restrictive in terms of density, particularly given the NPPF seeks the efficient use of land. As such, there should be no maximum prescribed density targets, rather it is for individual sites to demonstrate that they can be delivered appropriately with respect to technical considerations, amenity and outlook, for example.</p>	
<p>DLP Planning Limited on behalf of Bowbridge Land Ltd</p>	<p>12<sup>th</sup> November 2021</p>	<p><b>Question: What do you consider to be the most appropriate affordable housing target(s) for the Borough area?</b></p> <p>An up to date, robust HENA should be undertaken to establish the Borough's affordable housing needs and establish whether an update to the affordable housing percentage targets is required when considered against the adopted Local Plan policy.</p> <p>The requirement for affordable housing needs to be kept under review and is inextricably linked to the LHN, the range of housing sites allocated, the appropriate density of development on allocated sites and individual site circumstances.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p>
<p>DLP Planning Limited on behalf of Bowbridge Land Ltd</p>	<p>12<sup>th</sup> November 2021</p>	<p><b>Green Infrastructure (Strategic Challenges)</b></p> <p><b>Question: Should the Council 'roll forward' the current Local Plan policy relating to Green Wedges with minor wording amendments to ensure that it is up-to-date with current national planning policy and guidance?</b></p>	<p>Noted.</p> <p>The Council will test various options during the course of preparing the Local Plan. A review of Green Wedges will be undertaken in the course of preparing the emerging new Local Plan.</p>

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		<p>In respect of the current adopted Local Plan, the Inspector asked for amendments to Policy 42 to enable greater flexibility to the forms of development that would be acceptable and in accordance with the objectives of Green Wedges. On behalf of our client, an objection was made to Modification MA9 as it was not considered to go far enough to satisfy the Inspectors request to enable greater flexibility. Evidence was presented to the Examination for the removal of land adjacent to the Cottage Farm Direction of Growth Area, to the rear of Sutton Close from the Green Wedge. Notwithstanding this, the land in question was not removed from the Green Wedge.</p> <p>It is therefore still maintained that this land does not fulfil the stated objectives of the Green Wedge and indeed, represents a logical extension to both the settlement and the allocation in adopted Policy 21. This site could make a valuable contribution to the delivery of sustainable development, being able to deliver housing both in the short and medium term, therefore making an important contribution towards meeting the Borough's future housing needs. A Green Wedge Review should be undertaken, and land releases made where these are shown not to impact adversely on the stated objectives of the Green Wedge. Indeed, this view is supported by paragraph 31 of the NPPF which confirms that the preparation and review of all policies should be underpinned by relevant and up to date evidence.</p>	
DLP Planning Limited on behalf of	12 <sup>th</sup> November 2021	<b><i>Question: Should the Council consider whether or not to undertake a Green Wedge Review in order to establish whether or not to retain, create new or amend the</i></b>	Noted.  The Council will test various options during the

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Bowbridge Land Ltd		<p><b><i>boundaries of the existing Green Wedges in order to take account of the new Local Plan proposed site allocations and any other factual updates?</i></b></p> <p>Please see answer to the question above – a Green Wedge Review should be undertaken, and land releases made where these are shown not to impact adversely on the stated objectives of the Green Wedge.</p>	<p>course of preparing the Local Plan. A review of Green Wedges will be undertaken in the course of preparing the emerging new Local Plan.</p>
DLP Planning Limited on behalf of Bowbridge Land Ltd	12 <sup>th</sup> November 2021	<p><b>Housing (Local Challenges)</b></p> <p><b><i>Question: Should the Council require that all new homes provided within the Borough comply with the Governments Technical Housing Standards?</i></b></p> <p>Footnote 49 of the NPPF confirms that planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified. Further, the NPPG provides guidance on the optional technical housing standards and confirms that local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans (Paragraph: 002 Reference ID: 56-002-20160519).</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council’s Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p>

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		<p>On this basis, if the Council intends to apply optional technical standards for accessible and adaptable housing and / or the Nationally Described Space Standards (NDSS), then this should only be done in accordance with the NPPF and NPPG i.e. a local assessment is required which justifies with credible and robust evidence the need for such standards.</p>	
<p>DLP Planning Limited on behalf of Bowbridge Land Ltd</p>	<p>12<sup>th</sup> November 2021</p>	<p><b><i>Should the Council 'roll forward' the current Policy approach set out in Local Plan Policy 11 – Housing Choices, ensuring that it is up to date with current national planning policy and guidance?</i></b></p> <p>Paragraph 31 of the NPPF confirms that the preparation and review of all policies should be underpinned by relevant and up to date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals. As such, it would not be appropriate to simply roll forward the policy approach to housing mix, and this must instead be reviewed and underpinned by relevant and up to date evidence (i.e. a HENA). In addition, any emerging policy should allow for suitable flexibility to allow housing mix to have regard to market conditions and viability at the relevant time.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p>
		<p><b>Land to the north of the Cottage Farm Direction of Growth Area – Update</b></p> <p>As noted above, land to the north of the Cottage Farm Direction of Growth Area was promoted for residential development as part of the previous Local Plan process, however, it was not allocated for development by the Borough</p>	<p>Noted.</p> <p>The Local Plan will consider a variety of sites by size and location to determine the best options for delivering the Borough's housing requirement.</p> <p>All sites received to date via the Call for Sites</p>

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		<p>Council at the time due to uncertainty regarding the access arrangements. The site has since been promoted through the Council's most recent Call for Sites process, and the Council published its Call for Sites: Site Collation and Initial Assessment in Spring 2021, confirming in respect of this site that "more certainty over the access arrangement(s) for the site will be required." This letter therefore seeks to respond to this requirement, providing an update on the current position with regards to access.</p> <p>To confirm, land to the south east 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</p>	<p>process in 2020 and 2021, including this site (OWBC Ref: OAD/007 – Land South of Sutton Close, Oadby) will be taken into account accordingly.</p>



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		<p>options; either from Sutton Close to the north or via Phase 2B of the development to the south. The northern boundary of the site abuts a number of existing residential properties. These properties are accessed from the short Cul-de-Sac lengths from Sutton Close and Triton Drive. 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 are at advanced stages of finalising the legal agreement 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>If appropriate, a link between the 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. 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 growth aspirations. This development would make an important contribution to meeting</p>	

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		<p>the Borough's identified need for new additional housing and 5 year housing land supply position, in a time of a national housing crisis.</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>	
DLP Planning Limited on behalf of Bowbridge Land Ltd	12 <sup>th</sup> November 2021	<p><b>Conclusion</b></p> <p>We consider that the suggestions set out within these representations are appropriate and will assist in ensuring sustainable, viable and deliverable development within Oadby &amp; Wigston. We trust these will be taken into consideration as the preparation of the New Local Plan progresses.</p>	Noted.

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Environment Agency	4 <sup>th</sup> November 2021	<p>The Environment Agency welcomes the opportunity to comment on the Issues and Options stage of your New Local Plan. We note that a suite of documents have been submitted Part 01 – 15, however the Environment Agency has focused our comments on those aspects for which we have a remit or environmental interest. This has meant that we have only commented on some of the documents and not necessarily answered the specific questions asked.</p> <p>As a general comment we would advocate that all Policies, in order to be relevant and most effective, should be in line with current national, regional and local planning policy and guidance.</p>	<p>Noted.</p> <p>The Council would like to thank the Environment Agency for taking time to read through the consultation document and for responding.</p>
Environment Agency	4 <sup>th</sup> November 2021	<p><b>Part 02 Overarching Policy Areas (Strategic Challenges)</b></p> <p><b><i>Where should development go?</i></b></p> <p>All new development will need to be sustainable from an environmental perspective and this means locating development where:</p> <ul style="list-style-type: none"> <li>• it is at least flood risk and where the development would not increase flood risk elsewhere, by taking a sequential approach in determining where new development should be located.</li> <li>• where the necessary infrastructure is in place such that the development would not cause a risk to water quality (i.e. by ensure the necessary water treatment facilities and infrastructure are in place);</li> </ul>	<p>Noted.</p>

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		<ul style="list-style-type: none"> <li>in the case of development on potentially contaminated land that the necessary remediation works are undertaken to ensure there is no pollution risk to controlled waters.</li> </ul> <p>The proximity of regulated process sites (i.e. those which operate with a Permit from the Environment Agency), e.g. Landfills, Incinerators, composting sites, waste transfer stations, will need to be carefully considered when deciding the location of new sensitive receptor development, e.g. housing. If these two development types are in too close proximity then this could lead to amenity issues for the sensitive development but also an unnecessary burden being put on the operator of the Permitted site.</p>	
Environment Agency	4 <sup>th</sup> November 2021	<p><b>Part 06 Green Infrastructure (Strategic Challenges)</b></p> <p><b>Green Infrastructure</b></p> <p>We agree with the option to maintain the current Local Plan policy position relating to Green Infrastructure with minor wording amendments. We recommend including amendments that state there is a requirement to deliver a minimum 10% net gain. We would also recommend that the policy is more ambitious by stating that net gains above 10% should be sought wherever possible. Reference should also be made to the need to secure any gains for a minimum period of 30 years. Although this information is expected to be included in the proposed New Environment Bill, inclusion here would strengthen the policy.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering in relation to the policy approach toward blue and green infrastructure as part of the preparation of the new Local Plan.</p> <p>The specific recommendations to improve and strengthen the relevant aspects have been noted and will be considered accordingly.</p>

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		<p>We also recommend that the policy is re-worded so that it is referred to as Blue-Green Infrastructure (BGI), making clear that all waterways, canals, rivers, streams and ditches etc. form part of this valuable asset. Mention of Natural Flood Management (NFM) should also be mentioned, for example in Para 4.6 in relation to climate change.</p> <p>BGI and 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 on the Wash Brook and at also the community at Wigston Harcourt. The Environment Agency can provide further advice and guidance if required.</p>	
Environment Agency	4 <sup>th</sup> November 2021	<p><b>Flood Risk</b></p> <p>The only main river of the Environment Agency within Oadby &amp; Wigston Borough Council is the River Sence. 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 Wash Brook 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>Evington Brook to the North has an Environment Agency project, 'Evington Brook Flood Alleviation Scheme'.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering in terms of flood risk and green and blue infrastructure as part of the preparation of the new Local Plan.</p> <p>The specific recommendations to improve and strengthen the relevant aspects have been noted</p>

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		<p>Following on from our comments on BGI and NFM, the Council could consider requiring development sites to provide 'better than greenfield' surface water attenuation. This would reduce the volume of water entering the catchments of the local watercourses, and reduce flood risk downstream. BGI/NFM measures could be used alongside more standard SUDS techniques. This would be especially valuable upstream of the Communities at Risk of flooding in the borough.</p> <p>With regards to flood model data, we do not have hydraulic modelling for the Wash Brook, which is an ordinary watercourse running through the borough. Downstream of the borough boundary it changes into the Saffron Brook Main River, which we do have model data for.</p> <p>We have an Environment Agency hydraulic model for the River Sence which runs through the borough, the 'River Sence Hydraulic Model and Floodplain Mapping, JBA, 2000'. This modelling is due to be updated, and should be available in approximately February 2022. The new Upper Sence model will cover the area from grid reference 465772, 298460 (HOMR) to 458843, 297666 (Crow Mill Bridge).</p> <p>With regards to the Oadby and Wigston Strategic Flood Risk Assessment (SFRA), waiting for this new model data would ensure that the SFRA is not superseded by the new data.</p>	<p>and will be considered accordingly.</p>

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		With regards to the policy approach, we consider that it is valuable for the Local Plan to apply the National Policies at a local level.	
Environment Agency	4 <sup>th</sup> November 2021	<p><b>Part 07 Environment and Sustainability (Strategic Challenges)</b></p> <p><b>Habitats and biodiversity</b></p> <p>We consider that the Council should ‘roll forward’ the current policy approach rather than only apply the policy principals and guidance set at the national level. Doing so strengthens the protective measures and allows the Council to add additional measures to protect non-statutory designated sites in the Borough.</p> <p>As with our comments made regarding Green Infrastructure, the proposed Environment Bill will require all developments to deliver a 10% net gain and it would be worthwhile stating this in your policy wording. We would also recommend including amendments that state there is a requirement to deliver a minimum 10% net gain. We would also recommend that the policy is more ambitious by stating that net gains above 10% should be sought wherever possible. Reference should also be made to the need to secure any gains for a minimum period of 30 years.</p> <p>New developments provide an ideal opportunity to reverse biodiversity loss if opportunities to de-culvert watercourses are realised at an early stage. We recommend including wording</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the preparation of the new Local Plan at both a strategic and local level. The Borough Council will be working alongside the County Council in formulating the evidence for biodiversity net gain.</p> <p>The specific recommendations to improve and strengthen the relevant aspects have been noted and will be considered accordingly.</p>

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		<p>to this effect, indicating that developments that do so would be encouraged and supported. Similarly, developments in/around Water Framework Directive designated waterbodies may seek to deliver gains for the watercourse based on its reasons for failure as per the Humber River Basin Management Plan. This would assist the Council in being able to ensure genuine and demonstrable biodiversity net gain.</p> <p>Use of the Defra Metric is advisable in that it provides an objective and consistent manner in which to assess the habitats on site, their losses and net gains. However, there may be cases where the outputs need to be adjusted. If this is the case, there should be flexibility to allow for this so long as it is clearly justified and agreed by qualified consultees.</p>	
Environment Agency	4 <sup>th</sup> November 2021	<p><b>Climate change</b></p> <p>We wish to provide the following comments which emphasises the importance of considering the issue of climate change in the Plan-making process.</p> <p>Section 19(1A) of the Planning and Compulsory Purchase Act 2004 places a legal duty on local authorities to ensure climate mitigation and adaptation are integrated across all local planning policy. National planning policy in England sets out the expectation that the planning system should deliver development that mitigates climate change, adapts to its impacts and improves biodiversity.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering in relation to climate change as part of the preparation process for the new Local Plan. This evidence work will provide basis for the new Local Plan.</p>



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		<p>The NPPF places emphasis on future development and states that plans should “pro-actively shape places in a way that contributes to radical reductions in greenhouse gas emissions, minimises vulnerability and improves resilience” as well as “making provision for the possible future relocation of vulnerable infrastructure and development”.</p> <p>Revisions to the NPPF in 2021 include a requirement to promote a sustainable pattern of development, by mitigating climate change and adapting to its effects (para 11a). The NPPF also states (para 134) that enhanced local policies and government guidance on design should be given ‘significant weight’.</p> <p>We would particularly advise your Authority to refer to the recent publication <i>The Climate Crisis – A Guide for Local Authorities on Planning for Climate Change</i> (tcpa, RTPI, Third Edition October 2021).</p> <p>We welcome that the Council acknowledges the need for climate change considerations and the role local plans have in the implementation of adaptation and mitigation measures.</p> <p>This policy approach does need to be updated to highlight that the UK government has declared a climate &amp; biodiversity emergency, and also to reference the recently published UK Net Zero strategy.</p> <p>A greater emphasis on the need for adaptation to the impacts of climate change through different aspects of the</p>	

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		<p>development process should be considered. For example, regarding design, the design principles outlined in current Policy 38 for developments of 11 dwellings could be implemented for all developments regardless of scale.</p> <p>Water conservation delivers many sustainability benefits including: conserving water resources, reducing energy use in the treatment and pumping of potable and waste water, efficient use of infrastructure capacity, reduced drought impact, and lower cost to residents.</p> <p>The Council could consider including the Planning Practice Guidance requirement that developments are safe for their lifetime including climate change.</p> <p>We advise that any 'rolling forward' of the current policy approach incorporates changes in line with the above observations.</p>	
Environment Agency	4 <sup>th</sup> November 2021	<p><b>Part 08 Infrastructure (Strategic Challenges)</b></p> <p><b>Viability</b></p> <p>Para 4.35 highlights that infrastructure, services and facilities considerations for all new growth are associated with policies in the Infrastructure Delivery Plan (IDP). Para 4.45 goes onto say that the IDP is to be revisited. We advise that any amendments/updates to the IDP are informed by the 2050 Leicester &amp; Leicestershire growth options study.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will also undertake evidence gathering in terms of infrastructure and environmental planning at a strategic and local level and the findings of these studies (and all evidence base) will inform policies related to new development,</p>

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		<p>Part 08 could include a greater emphasis on strategic planning for development. It would also be appropriate to include a 'water' section in Part 08. The impact which development would have on the water environment will need to be determined – in terms of quality and quantity. Policies would need to ensure that any adverse impacts are avoided / mitigated for. For example, regarding water quality, development and growth must not impact upon the quality of watercourses in the Borough. A deterioration may result from additional discharges from sewage treatment works and overflows from the sewerage network, changes in quality, quantity or rate of flow as a consequence of urbanisation or increased surface runoff. Growth plans should show consideration in consultation with Severn Trent Water Ltd to ensure sewerage infrastructure and the treatment works in the borough are capable of accepting the growth and treating the effluent to a suitable quality standard to ensure no deterioration in quality or flow of receiving water bodies.</p>	<p>including that related to the consideration and assessment of specific sites put forward for new growth opportunities.</p> <p>As part of this work, the Council has already begun and will continue to regularly engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions will continue to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects have been noted and will be considered accordingly.</p>
Environment Agency	4 <sup>th</sup> November 2021	<p><b>Part 09 Housing (Local Challenges)</b></p> <p><b>Sustainable homes</b></p> <p>Regarding Para 4.21 there should be a requirement for the 110 l/p/d water efficiency design standard. This is especially pertinent since the Severn Trent Water area is now classified as an 'area of serious water stress'.</p>	<p>Noted, this will be explored further through the preparation of the New Local Plan.</p>
Environment Agency	4 <sup>th</sup> November 2021	<p><b>Part 10 Design and Character (Local Challenges)</b></p> <p><b>Renewable and low carbon energy production</b></p>	<p>Noted, the Council will be developing its evidence base further in relation to climate change to ensure the new Local Plan is evidence led in relation to the</p>

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		<p>One of the most significant energy uses in the home is for space heating/cooling. Therefore, passive design elements which improve the building envelope to reduce energy loss such as building orientation, building design and insulation can have a significant effect on reducing the energy consumption of a building. These cost-efficient upfront measures should be considered alongside the low-carbon generation technology in this section of the document as a way to maximise energy efficiency.</p> <p>Consideration within developments could also be given to centralised district heating as an energy efficient means of providing space and water heating to multiple properties.</p> <p>I hope and trust you find the above comments useful, and we look forward to being consulted on the next stage of your Plan-making process.</p>	<p>production of renewable and low carbon energy.</p> <p>The specific recommendations to improve and strengthen the relevant aspects have been noted and will be considered accordingly.</p>
Environment Agency	4 <sup>th</sup> November 2021	<p><b>The Borough of Oadby and Wigston New Local Plan Sustainability Appraisal Scoping Report</b></p> <p><b>Plans, Policies and Programmes</b></p> <p>With reference to Chapter 2 Relevant Plans and Policies, only the NPPF appears to have been included. The following is not an exhaustive list, but are some key documents which we strongly advice should be included as part of the evidence base:</p>	<p>Noted.</p> <p>The Local Plan’s Sustainability Appraisal must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The specific recommendations to improve and strengthen the relevant aspects of the Sustainability Appraisal element of the Local Plan preparation have been noted and will be considered</p>

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		<p><i>Abstraction Licence Strategies (also known as CAMS), 2020</i>  This catchment abstraction management strategy (CAMS) sets out how the Environment Agency will manage water resources in the Soar catchment, provides information on how existing abstraction is regulated and details if water is available for further abstraction.</p> <p>The plan details how it protects our requirements under the Water Framework Directive, ensuring no ecological deterioration to our rivers. All the strategies can be found on gov.uk</p> <p><a href="https://www.gov.uk/government/collections/water-abstraction-licensing-strategies-cams-process">https://www.gov.uk/government/collections/water-abstraction-licensing-strategies-cams-process</a>.</p> <p><i>Humber River Basin Management Plan</i>  The Humber River Basin Management Plan (RBMP) was updated in 2015. The plan uses updated information to set out the latest understanding of the pressures facing the water environment in the Humber River Basin District. As before, the Plan has been prepared in accordance with the Water Framework Directive, and this update is the second of a series of six-yearly planning cycles. Pages 89 – 100 provide further information about the changes that have taken place since 2009.</p> <p>The Plan and associated supported documents are available at:</p>	<p>accordingly.</p>

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		<p><a href="https://www.gov.uk/government/collections/river-basin-management-plans-2015#humber-river-basin-district-rbmp-2015">https://www.gov.uk/government/collections/river-basin-management-plans-2015#humber-river-basin-district-rbmp-2015</a>.</p> <p><b>It should be noted that a review and update of the current RBMPs is currently underway. The consultation of the draft new RBMP's is open and runs from 22 October 2021 to 22 April 2022.</b></p> <p><i>The Environment Agency's approach to groundwater protection, 2017</i>                      The Environment Agency previously advised of the Environment Agency's Groundwater Protection: Policy and Practice (GP3). This has now been withdrawn and replaced with 'The Environment Agency's approach to groundwater protection' which can be found on the following link.  <a href="https://www.gov.uk/government/collections/groundwater-protection">https://www.gov.uk/government/collections/groundwater-protection</a>.</p>	
Environment Agency	4 <sup>th</sup> November 2021	<p><b>Flood Risk</b></p> <p><i>Flood and Water Management Act 2010</i>                      The Flood and Water Management Act, 2010 takes forward some of the proposals from the Future Water and Making Space for Water publications and the UK Government's response to Sir Michael Pitt's Review of the Summer 2007 floods.</p> <p>The Act gives the Environment Agency a strategic overview of flood risk management in England and upper tier authorities</p>	Noted, the Borough Council will be undertaking further work in relation to flood risk and updating the Strategic Flood Risk Assessment to inform the preparation of the new Local Plan.

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		<p>responsibility for preparing and putting in place strategies to manage flood risk from groundwater, surface water and ordinary watercourses in their areas.</p> <p>A copy of the Act is available at:</p> <p><a href="http://www.legislation.gov.uk/ukpga/2010/29/pdfs/ukpga_20100029_en.pdf">http://www.legislation.gov.uk/ukpga/2010/29/pdfs/ukpga_20100029_en.pdf</a>.</p> <p><i>National Flood and Coastal Erosion Risk Management Strategy for England</i> The National Flood and Coastal Erosion Risk Management Strategy for England was approved in September 2020. Risk management authorities now have to have regard for this strategy when undertaking activities.</p> <p><a href="https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2">https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2</a>.</p> <p><i>National flood and coastal erosion risk management strategy for England action plan</i> The Flood and Coastal Erosion Risk Management (FCERM) Strategy for England committed the Environment Agency to publish an action plan.</p> <p><a href="https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england-action-plan">https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england-action-plan</a>.</p> <p><i>Climate Change Allowances (2021)</i></p>	

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		<p>There are a range of climate change allowances that can be used based on time periods, and the likelihood of it occurring. An update to the allowances was made in July 2021 (substantial change) and October 2021. From July 2021 the new allowances will need to be used by developers and local authorities for flood risk assessments and strategic flood risk assessments.</p> <p><a href="http://www.gov.uk">Flood risk assessments: climate change allowances - GOV.UK (www.gov.uk)</a>.</p>	
Environment Agency	4 <sup>th</sup> November 2021	<p><b>Waste</b></p> <p><i>Waste (England and Wales) Regulations 2011</i> The Waste (England and Wales) (Amendment) Regulation 2012 were laid before Parliament and the Welsh Assembly on 19 July 2012 and come into force on 1 October 2012. The amended regulations relate to the separate collection of waste. They amend the Waste (England and Wales) Regulation 2011 by replacing regulation 13.</p> <p>Further information can be found at: <a href="https://www.gov.uk/guidance/waste-legislation-and-regulations">https://www.gov.uk/guidance/waste-legislation-and-regulations</a>.</p>	<p>Noted, the new Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The specific recommendations to improve and strengthen the relevant aspects of the new Local Plan have been noted and will be considered accordingly.</p>
Environment Agency	4 <sup>th</sup> November 2021	<p><b>Biodiversity</b></p> <p><i>Nature Recovery Network</i> The Nature Recovery Network (NRN) is a major commitment in the government's 25 Year Environment Plan. By bringing</p>	<p>Noted, the new Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The specific recommendations to improve and</p>



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		<p>together partners, legislation and funding, we can restore and enhance the natural environment.</p> <p><a href="https://www.gov.uk/government/publications/nature-recovery-network">https://www.gov.uk/government/publications/nature-recovery-network</a>.</p> <p><i>25 Year Environment Plan</i> The 25 Year Environment Plan, released in 2018, sets out the government's plan to improve the environment.</p> <p><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf</a>.</p> <p><i>Environment Bill – Ongoing Legislation</i> The Environment Bill is ongoing legislation that is currently going through parliament. It is expected that as part of this bill Biodiversity Net Gain will be mandated for new development.</p>	<p>strengthen the relevant aspects of the new Local Plan have been noted and will be considered accordingly.</p>
Environment Agency	4 <sup>th</sup> November 2021	<p><b>Protection of controlled waters – Groundwater and Sustainable remediation</b></p> <p>Brownfield re-development is discussed, although briefly, within the document and which we welcome. However, sustainable remediation is not mentioned and we consider this omission should be addressed.</p> <p>The following is an extract from the Environment Agency's Land Contamination Risk Management (LCRM) guidance: <a href="#">Land contamination risk management (LCRM) - GOV.UK</a></p>	<p>Noted, the new Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The specific recommendations to improve and strengthen the relevant aspects of the new Local Plan have been noted and will be considered accordingly.</p>

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		<p><a href="http://www.gov.uk">www.gov.uk</a>. This guidance should be referenced in the Scoping Report.</p> <p><u>“Sustainable remediation</u> It is important to consider a sustainable approach to remediation.</p> <p>Remediation has the potential to cause environmental, economic and social impacts. You can demonstrate how you have addressed this by showing:</p> <ul style="list-style-type: none"> <li>• the benefit of doing remediation is greater than its impact</li> <li>• you have used a balanced decision making process to select the optimum remediation solution</li> </ul> <p>The remediation can also have adverse effects on climate change if it is not done correctly. If you select a poor remediation design and implementation, the activities may cause greater adverse effect than the contamination it aims to address.</p> <p>The remediation needs to manage the unacceptable risks in a safe and timely manner. It needs to aim to maximise the overall environmental, social and economic benefits across the whole supply chain.</p> <p>For further details see the <a href="#">UK Sustainable Remediation Forum (SuRF-UK)</a> on the CL:AIRE website.”</p>	
Environment Agency	4 <sup>th</sup> November 2021	<b><u>Baseline information</u></b>	Noted, the new Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.

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		<p>Throughout the document, reference to green infrastructure should be amended to “green <b><i>and blue</i></b> infrastructure” to highlight the importance of the water environment.</p> <p>Para 3.9. There should be additional consideration of <b>all</b> waterways and blue corridors, not just the Grand Union Canal and the River Sence. Blue infrastructure assets should be included with any discussion or consideration of green infrastructure. Rivers, streams, ditches etc. should be considered for their biodiversity benefits in addition to the flood risk and water quality issues highlighted in paragraphs 3.14 - 3.16.</p> <p>Para 3.14. <u>Correction</u> required. The Severn Trent Water area has been reclassified as an ‘area of serious water stress’ for water resources. The new classification can be found online here: <a href="https://www.gov.uk/government/publications/water-stressed-areas-2021-classification">https://www.gov.uk/government/publications/water-stressed-areas-2021-classification</a>.</p> <p>Para 3.14. We advise that the sentence “<i>Opportunities to include green infrastructure into new developments will be important because of the beneficial role it can play in flood risk mitigation</i>” should be amended to:</p> <p>“<i>Opportunities to include green infrastructure into new developments will be important because of the <b>multiple benefits it provides including</b> <del>beneficial role it can play in flood risk mitigation,</del> <b>Biodiversity net gain, amenity value and water quality improvement</b>”.</i></p>	<p>The specific recommendations to improve and strengthen the relevant aspects of the new Local Plan have been noted and will be considered accordingly.</p>

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		<p>Para 3.15. The Borough also contains the WFD waterbody “Wash Brook Catchment (trib of Soar)” which has an overall classification of moderate. The following entry should therefore be added to Table 2:</p> <table border="1" data-bbox="584 564 1391 743"> <thead> <tr> <th>River</th> <th>Overall Biological Quality</th> <th>Overall Physico Chemical Quality</th> <th>Hydro morphological Quality</th> <th>Overall Specific Pollutants Quality</th> </tr> </thead> <tbody> <tr> <td>Wash Brook Catchment (trib of Soar)</td> <td>Moderate</td> <td>Moderate</td> <td>Supports Good</td> <td>Moderate</td> </tr> </tbody> </table> <p>(Catchment Data Explorer link <a href="https://environment.data.gov.uk/catchment-planning/WaterBody/GB104028046910">https://environment.data.gov.uk/catchment-planning/WaterBody/GB104028046910</a>).</p> <p>Paragraph 3.16, regarding flood risk in the Borough, should also mention the Wash Brook.</p>	River	Overall Biological Quality	Overall Physico Chemical Quality	Hydro morphological Quality	Overall Specific Pollutants Quality	Wash Brook Catchment (trib of Soar)	Moderate	Moderate	Supports Good	Moderate	
River	Overall Biological Quality	Overall Physico Chemical Quality	Hydro morphological Quality	Overall Specific Pollutants Quality									
Wash Brook Catchment (trib of Soar)	Moderate	Moderate	Supports Good	Moderate									
Environment Agency	4 <sup>th</sup> November 2021	<p><b><u>Key sustainability issues and likely evolution without the Plan</u></b></p> <p>Para 4.2. In addition to the Protection of the natural environment and species, a key sustainability issue is to make provisions to increase the amount of natural environmental. This would increase the habitat available for protected species and would actively tackle species decline as a result of climate change. It is no longer enough to simply protect what is there.</p>	<p>Noted.</p> <p>The Local Plan’s Sustainability Appraisal must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The specific recommendations to improve and strengthen the relevant aspects of the Sustainability Appraisal element of the Local Plan preparation have been noted and will be considered</p>										

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			accordingly.
Environment Agency	4 <sup>th</sup> November 2021	<p><b><u>Sustainability Framework</u></b></p> <p><b><u>Table 7</u></b></p> <p><b><u>SA Objective 9</u></b> We suggest the heading for this objective does not fully convey the issues it intends to cover, i.e. Water resources <i>and</i> water quality <i>and</i> flood risk. These are all different and distinct areas. We would advise amending the title to “<b>Water Resources and Water Quality</b>” and that it may be appropriate to include flood risk elsewhere, for example as a Sub-Objective of SA Objective 13.</p> <p><b><u>SA Objective 13</u></b> There are two key aspects to addressing climate change: mitigation and adaptation. Both are equally as important. As well as mitigating the effects of climate change development must also be planned in such way that it is resilient (adaptable) to the effects of climate change. Whilst we acknowledge SA Sub-Objective refers to adaptation, the wording of the</p>	<p>Noted.</p> <p>The Local Plan’s Sustainability Appraisal must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The specific recommendations to improve and strengthen the relevant aspects of the Sustainability Appraisal element of the Local Plan preparation have been noted and will be considered accordingly.</p>

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		<p>Objective 13 currently only addresses mitigation. We therefore recommend the wording of Objective 13 is amended to read:</p> <p><b>“To reduce greenhouse gas emissions to mitigate the rate of climate change and to adapt to the effects of climate change.”</b></p> <p>The sustainable distance for the Natural Environment has been given as 1,000m. Whilst this is important for access, the importance of well-connected habitats is far greater. So, rather than having small pockets every 1,000, better biodiversity can be achieved by a bigger, better and better connected site.</p>	
Environment Agency	4 <sup>th</sup> November 2021	<p><b><u>Monitoring</u></b></p> <p>Table 8, point 8. In addition to the <u>numbers</u> or <u>percentages</u> of planning applications that deliver for this target, it would be better to monitor the quantity and quality of what they deliver. For example, if 9/10 small developments each deliver a small pond but the remaining 1 large development delivers a wetland with a series of open water and reedbed habitats etc, then that detailed information captures the true outcome.</p> <p>Monitoring indicator 9: <i>To manage prudently water resources, improve water quality and reduce vulnerability to flooding.</i></p> <p>We consider another indicator could be:</p> <ul style="list-style-type: none"> <li>• <b>Number of waterbodies with improved Water Framework Directive status.</b></li> </ul>	<p>Noted.</p> <p>The Local Plan’s Sustainability Appraisal must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The specific recommendations to improve and strengthen the relevant aspects of the Sustainability Appraisal element of the Local Plan preparation have been noted and will be considered accordingly.</p>

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		We suggest you consider including an indicator for pro-active interventions to reduce flood risk. These could include projects such as Natural Flood Management interventions upstream of urban areas.	

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<p>Forestry Commission</p>	<p>23<sup>rd</sup> November 2022 (outside of consultation period response)</p>	<p>Although the Forestry Commission is not in a position to input into the consultation process for Local Plans, however, we can provide information to assist you in assessing the appropriateness of sites for future development with regard to any which may be near to Ancient Woodland and to highlight opportunities for achieving your renewable energy obligations. Ancient woodlands are irreplaceable. They have great value because they have a long history of woodland cover, with many features remaining undisturbed. This applies both to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS).</p> <p>It is Government policy to refuse development that will result in the loss or deterioration of irreplaceable habitats including ancient woodland, unless “there are wholly exceptional reasons and a suitable compensation strategy exists” (National Planning Policy Framework paragraph 180(c) – update July 2021)</p> <p>We also particularly refer you to further technical information set out in Natural England and Forestry Commission’s <a href="#">Standing Advice</a> on Ancient Woodland – plus supporting <a href="#">Assessment Guide and Case Decisions</a>.</p> <p>As a Non Ministerial Government Department, we provide no opinion supporting or objecting to a policy, an application or site allocation. Rather we are including information on the potential impact that the proposed development would have on the ancient woodland.</p> <p>Please note that with any proposals that impact on the Public Forest Estate then the Forestry Commission is a party to the application.</p> <p>This response provides factual information on related policy which the planning authority may take account of when preparing plans and when making its decision on applications. If the planning authority takes the decision to approve an application which may impact on Ancient Woodland sites we may be able to give further support in developing appropriate conditions in relation to woodland management mitigation or</p>	<p>Noted.</p>
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		<p>compensation measures. Please note however that the Standing Advice states that “<i>Ancient woodland or veteran trees are irreplaceable, so you should not consider proposed compensation measures as part of your assessment of the benefits of the development proposal</i>”.</p> <p>We suggest that you take regard of any points provided by Natural England about the biodiversity of any such woodland.</p> <p>The resilience of existing and new woodland is a key theme of the Forestry Commission’s work to Protect, Improve and Expand woodland in England we will continue to work with Forestry / Woodland owners, agents, contractors and other Stakeholders to highlight and identify, pests and diseases and to work in partnership to enable Woodlands and Forests are resilient to the impacts of Climate Change.</p> <p>Woodfuel and timber supplies continue to be an opportunity for local market growth whilst also enabling woodlands to be brought back into active management.</p> <p>Flood risk: The planting of new riparian and floodplain woodland, can help to reduce diffuse pollution, protect river morphology, moderate stream temperature and aid flood risk management, as well as meet Biodiversity Action Plan targets for the restoration and expansion of wet woodland.</p> <p>The Forestry Commission is keen to work in partnership with Woodland / Forest Stakeholders to develop opportunities for woodland creation to deliver these objectives highlighted above.</p> <p>In the wider planning context the Forestry Commission encourages local authorities to consider <a href="#">the role of trees in</a></p>	

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		<p><a href="#">delivering planning objectives as part of a wider integrated landscape approach</a>. For instance through:</p> <ul style="list-style-type: none"> <li>• the inclusion of <a href="#">green infrastructure</a> (including trees and woodland) in and around new development; and</li> <li>• the use of locally sourced wood in construction and as a sustainable, carbon lean fuel.</li> </ul>	

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Gladman Developments Ltd	26 <sup>th</sup> October 2021	<p><b>Context</b></p> <p>Gladman welcome the opportunity to comment on the Oadby &amp; Wigston Borough Council New Local Plan Issues &amp; Options consultation and request to be updated on future consultations and the progress of the Local Plan.</p> <p>Gladman Developments Ltd specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public.</p> <p>The Council will need to carefully consider its policy choice and ensure that the proposed approach positively responds to the revised National Planning Policy Framework (2021). There will also be a need to take consideration of changing circumstances associated with national planning policy and guidance over the course of the plan preparation period, including the Government’s emerging proposals for the planning system, as set out in the Ministry for Housing, Communities and Local Government (MHCLG) consultations on “Changes to the Current Planning System, August 2020”, “Planning for the Future, August 2020” and “National Planning Policy Framework and National Model Design Code: consultation proposals”.</p>	<p>Noted.</p> <p>The Council would like to thank Gladman Developments Ltd for taking time to read through the consultation document and for responding.</p>
Gladman	26 <sup>th</sup> October	<b>Plan Making</b>	Noted.

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Developments Ltd	2021	<p>The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:</p> <ul style="list-style-type: none"> <li>• Positively Prepared – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</li> <li>• Justified – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.</li> <li>• Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and</li> <li>• Consistent with National Policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</li> </ul>	
Gladman Developments Ltd	26 <sup>th</sup> October 2021	<p><b>Legal Compliance</b></p> <p><b>Duty to Co-operate</b></p> <p>The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>Local planning authorities in the Housing Market Area (HMA) have mechanisms in place that enable</p>

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		<p>constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2020 Sevenoaks District Council Local Plan examination and subsequent Judicial Review, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.</p> <p>Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance (PPG) it is clear that it is intended to produce effective policies on cross-boundary strategic matters.</p> <p>In this regard, Oadby &amp; Wigston must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet any of Leicester City's unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.</p> <p>The revised Framework introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. Planning</p>	<p>joint working and addressing such matters under the Duty to Co-operate and regular reviews of a Statement of Common Ground.</p>

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		<p>guidance sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SoCG), throughout the plan making process. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.</p>	
<p>Gladman Developments Ltd</p>	<p>26<sup>th</sup> October 2021</p>	<p><b>Sustainability Appraisal</b></p> <p>In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.</p> <p>Oadby &amp; Wigston Borough Council should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Oadby &amp; Wigston New Local Plan's</p>	<p>Noted.</p> <p>The Local Plan's Sustainability Appraisal must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>

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		decision-making and scoring should be robust, justified and transparent.	
Gladman Developments Ltd	26 <sup>th</sup> October 2021	<p><b>National Planning Policy Framework</b></p> <p>On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework which was subsequently updated in February 2019 and July 2021. These publications are revisions to the initial 2012 Framework and implemented changes that were informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and Planning for the Future consultation.</p> <p>The revised Framework (2019) introduced a number of major changes to national policy which provide further clarification to national planning policy as well as new measures on a range of matters. Crucially, national policy reaffirms the Government’s commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. In particular, Paragraph 16 of the Framework (2021) states that Plans should:</p> <p>“a) Be prepared with the objective of contributing to the achievement of sustainable development; b) Be prepared positively, in a way that is aspirational but deliverable;</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>

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		<p>c) Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;</p> <p>d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;</p> <p>e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and</p> <p>f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).”</p> <p>To support the Government’s continued objective of significantly boosting the supply of homes, it is important that the Local Plan provides a sufficient amount and variety of land that can be brought forward, without delay, to meet housing needs.</p> <p>In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs assessment defined using the standard method, unless there are exceptional circumstances to justify an alternative approach. Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 67 sets out specific guidance that local planning authorities should take into account when identifying and meeting their housing needs.</p>	



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		<p>While Annex 2 of the Framework (2021) provides definitions for the terms “deliverable” and “developable.</p> <p>Once a local planning authority has identified its housing needs, these needs should be met as a minimum, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. This includes considering the application of policies such as those relating to Green Belt and giving consideration as to whether or not these provide a strong reason for restricting the overall scale, type and distribution of development (paragraph 11b)i.). Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the NPPF), Local Authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full (see Paragraph 35 of the NPPF 2021).</p> <p>The July 2021 revision to the NPPF provides greater focus on the environment, design quality and place-making alongside providing additional guidance in relation to flooding setting out a Flood Risk Vulnerability Classification at Annex 3, the importance of Tree-lined streets and amendments to Article 4 directions. Additionally, Local Plans which have not yet progressed to Regulation 19 stage should ensure that where strategic developments such as new settlements or significant extensions are required, they are set within a vision that looks ahead at least 30 years (See paragraph 22).</p> <p>The amendments coincide with the publication of the National Design Guide and National Model Design Code, a toolkit</p>	

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		<p>which helps local communities to shape local design needs and provide guidance for creating environmentally responsive, sustainable and distinctive places with a consistent and high-quality standard of design.</p>	
<p>Gladman Developments Ltd</p>	<p>26<sup>th</sup> October 2021</p>	<p><b>Planning Practice Guidance</b></p> <p>The Planning Practice Guidance (PPG) was first published by the Government to provide clarity on how specific elements of the NPPF should be interpreted. The PPG has been updated to reflect the changes introduced by the revised NPPF to national planning policy. The most significant changes to the PPG relate to defining housing need, housing supply and housing delivery performance.</p> <p>The Standard Method was introduced by the Government to simplify the process of defining housing need, avoid significant delay in plan preparation and ultimately facilitate the Government’s ambition to achieve 300,000 new homes annually.</p> <p>Revisions to the PPG on the 20th February 2019 confirmed the need for local planning authorities to use the 2014-household projections as the starting point for the assessment of housing need under the standard method.</p> <p>It is also vital to consider the economic impact of COVID-19 and the long-term role that housing will play in supporting the recovery of the economy, both locally and nationally. We support the Council in its positive approach to plan for above</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>

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		<p>the minimum requirement, which will enable Oadby &amp; Wigston to capture a larger proportion of the £7 billion yearly housebuilder contributions. With 218,000 homes predicted not to be built due to COVID-19 from now to 2024/25, it is also imperative that Oadby &amp; Wigston Borough New Local Plan identifies sufficient land to support the delivery of homes.</p> <p>In order for the housing needs for the whole plan period to be met, it will also be essential to provide sufficient headroom within the housing supply. In this regard, Gladman supports the Home Builders Federation’s recommendation that local plan should seek to identify sufficient deliverable sites to provide a 20% buffer between the housing requirement and supply.</p>	
Gladman Developments Ltd	26 <sup>th</sup> October 2021	<p><b>National Planning Policy Consultations</b></p> <p>On the 6th August 2020, Government published the Planning for the Future White Paper setting out proposals for how it is seeking to ‘radically reform’ the planning system. The proposals are seeking to streamline and modernise the planning process.</p> <p>A further consultation on immediate changes to the current planning system closed on 01 October 2020. Of significant note is a proposed revised standard method for calculating local housing need, which proposed to incorporate a percentage of existing stock as the baseline of the calculation.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping</p>

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		<p>In December 2020 the Government published their response to the ‘Changes to the Current Planning System’. This document provides an overview of the consultation responses before highlighting that it has been deemed that the most appropriate approach is to retain the Standard Method in the current form with an additional 35% uplift to the ‘post-cap number’ for 20 local authorities. The Government’s rationale behind this approach is to increase home-building in existing urban areas to make the most of previously developed brownfield land over and above that in the existing standard method.</p> <p>The latest correspondence from Government regarding the revisions to the Standard Method for calculating local housing need will not affect the minimum local housing need which Oadby &amp; Wigston Borough Council should Plan for.</p> <p>In her speech at the State Opening of Parliament in May 2021, the Queen announced that the Government will introduce “laws to modernise the planning system, so that more homes can be built, will be brought forward...”. Notes accompanying the speech confirm that a future Planning Bill will seek to create a simpler, faster, and more modern planning system that ensures homes and infrastructure can be delivered more quickly across England. Timings on the publication of the draft Planning Bill remain uncertain, however, subject to the outcomes of this process, the Government has signalled its intent to make rapid progress toward this new planning system through the swift introduction of new legislation to implement the changes. It will be important that the Council keeps</p>	<p>to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>

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		abreast with the implementation of these changes to determine any potential implications for the Local Plan.	
Gladman Developments Ltd	26 <sup>th</sup> October 2021	<p><b>ISSUES AND OPTIONS CONSULTATION</b></p> <p><b>Overarching Policy Areas (Strategic Challenges)</b></p> <p><b>The Plan period and cooperation</b></p> <p><i>Is the suggested Local Plan time period of ‘date of adoption to the year 2041’ appropriate?</i></p> <p>The proposed plan period will run up to the year 2041 with anticipated adoption set for 2023. This accords with the requirements set out in paragraph 22 of the NPPF, however, Gladman consider that the Council should align the New Local Plan period with the emerging Local Plans of the neighbouring local authorities to provide certainty and clarity in addressing unmet needs from Leicester City.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p>
Gladman Developments Ltd	26 <sup>th</sup> October 2021	<p><b>Who should be the key stakeholders that the Council enters into Statements of Common Ground with?</b></p> <p>Gladman agree with the approach that has currently been taken by Oadby &amp; Wigston in relation to engagement and the agreed Statement of Common Ground (SoCG). It is considered that the Council should continue to engage with all of the Leicester and Leicestershire authorities, including Leicester County Council, in the production of a SoCG and</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>Local planning authorities in the Housing Market Area (HMA) have mechanisms in place that enable joint working and addressing such matters under the</p>

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		collaborative working to address Leicester City's declared unmet need.	Duty to Co-operate and regular reviews of a Statement of Common Ground.
Gladman Developments Ltd	26 <sup>th</sup> October 2021	<p><b>Where should development go?</b>  <b><i>Which of the proposed options illustrated above should be used in determining the location of new development within the Borough area?</i></b></p> <p><b><i>Should all new development incorporate an element of housing, shops, leisure and employment, or should shops and employment remain in designated areas, for example town centres and identified employment areas?</i></b></p> <p>Gladman consider that a balanced approach to the location of new development with a mix of urban development and greenfield land is required to ensure that the housing needs including types and affordable homes are delivered in the borough over the entire plan period.</p> <p>The NPPF promotes an effective use of land and encourages the development of previously-developed or 'brownfield' land, however the difficulties in relation to viability, timescales and availability of such sites much be acknowledged. A balanced approach, of both brownfield sites and greenfield land will ensure that affordable homes and community benefits can be delivered while also helping to make effective use of land in the district.</p> <p>In addition, requiring all new development to be 'mixed-use' in regards to providing an element of housing, shops, leisure and</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>

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		employment may not be appropriate in all locations of the district and on different types of sites. In this regard, the plan should not impose blanket requirements for such a policy but encourage specific sites to deliver uses where identified need exists.	
Gladman Developments Ltd	26 <sup>th</sup> October 2021	<p><b>Environment and Sustainability (Strategic Challenges)</b></p> <p><b>Habitats and Biodiversity</b></p> <p><b><i>Should the Council ‘roll forward’ the current policy approach set out in Local Plan (relevant parts of) Policy 37 – Biodiversity and Geodiversity, ensuring that it is up to date with current national planning policy and guidance?</i></b></p> <p><b><i>In what ways do you consider that the Council could ensure genuine and demonstrable biodiversity net gains on all new development sites?</i></b></p> <p><b><i>Should the Council be making use of Natural England’s Biodiversity Metric, or are there more appropriate ways of calculating biodiversity net gain?</i></b></p> <p>The Council should be aware of and align with the emerging Environment Bill 2019-2021 which is set to impose a mandatory requirement for qualifying new development to deliver a 10% net gain in biodiversity. This requirement is more restrictive than the approach within the current Local</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance, including the Environment Bill.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan, including Biodiversity Net Gain.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>

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		Plan Policy 37 and the Council should consider the implications of continuing their current policy approach.	
Gladman Developments Ltd	26 <sup>th</sup> October 2021	<p><b>Housing (Strategic Challenges)</b></p> <p><b>Housing Need</b></p> <p><i>Is there any robust evidence to suggest that the Council should continue to use the current housing requirement of 148 new homes per year set out within the current Local Plan?</i></p> <p><i>Should the Council use the housing need figure of 180 new homes per year calculated by the Standard Method?</i></p> <p><i>What should the Council do if the HENA outcomes suggests that there should be a diversion from the Standard Method?</i></p> <p><i>What do you consider is the evidenced housing need for the Borough area?</i></p> <p><i>Should the Borough area be taking any of Leicester City's declared unmet housing need?</i></p> <p>National policy guidance is clear that the standard method for calculating local housing need represents the minimum number of homes that a local authority should plan for through the strategic policies of their Plan.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>



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		<p>The PPG further highlights that the Standard Method does not account for the impact of future government policies, changing economic circumstances or other factors which may impact demographic behaviour, before providing circumstances where it be may appropriate to increase housing need which includes unmet need from neighbouring authorities. In addition, it is noted that assessments of need such as Strategic Housing Market Assessment (SHMA) may conclude higher housing needs than the outcome of the Standard Method.</p> <p>Therefore, national planning policy guidance is clear that the minimum housing need figure that should be planned for in Oadby &amp; Wigston at the present moment in time is 180 new homes per annum. Notwithstanding this, the Council should fully investigate the circumstances in the borough over the proposed plan period to ascertain if the Standard Method figure fully meets the objectively assessed housing needs of Oadby &amp; Wigston.</p> <p>In addition, the borough should cooperate with their neighbouring authorities through the SoCG process to ascertain whether they are able to accommodate unmet needs from Leicester which would warrant an uplift to the standard method figure for Oadby &amp; Wigston or even if the borough cannot accommodate their own housing need in the emerging Plan.</p> <p>The unmet housing needs of Leicester has been a prolonged issue in the region and it is vital that these identified needs are</p>	

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		delivered in the near future to ensure real people are able to access housing in their local area.	
Gladman Developments Ltd	26 <sup>th</sup> October 2021	<p><b>Housing (Local Challenges)</b></p> <p><b>First Homes</b></p> <p><i>Is there robust evidence to suggest that the level of discount should be increased within the Borough area?</i></p> <p><i>Do you consider that ‘First Homes’ will be of genuine benefit to the local communities within the Borough area?</i></p> <p>The PPG highlights that First Homes must be discounted by a minimum of 30% against the market value with local authorities able to increase the required discount providing they can demonstrate a need for this.</p> <p>If Oadby &amp; Wigston are seeking to require a higher minimum discount than 30% then this should be fully evidenced and justified through a housing needs assessment and tested through a viability assessment to ensure deliverability.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing and in particular affordable housing, (including ‘First Homes’).</p> <p>In particular, evidence gathered will indicate whether current levels of affordable housing are still appropriate and viable.</p>
Gladman Developments Ltd	26 <sup>th</sup> October 2021	<p><b>Sustainable Homes</b></p> <p><i>Which of the above potential options do you consider to be the most appropriate?</i></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering</p>

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		<p>Gladman consider that the appropriate mechanism to deliver sustainability standards for new homes is through the relevant Building Regulations.</p> <p>Notwithstanding this, if the Council were to pursue alternative requirements, as proposed in paragraph 4.21 of the consultation document, this should be fully justified through clearly evidenced needs considering the standards set out in national policy alongside considering the proposed requirements through a viability assessment.</p>	<p>in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing and in particular Sustainability and design.</p>
Gladman Developments Ltd	26 <sup>th</sup> October 2021	<p><b>Conclusions</b></p> <p><b>Summary</b></p> <p>Gladman welcomes the opportunity to comment on the issues and options that are currently being explored by the Council. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF 2021) and the associated updates that were made to Planning Practice Guidance.</p> <p>Gladman have provided comments on a number of the issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the process of undertaking the new Local Plan.</p> <p>We hope you have found these representations informative and useful towards the preparation of the Oadby &amp; Wigston Borough New Local Plan and Gladman welcome any future</p>	Noted.

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		engagement with the Council to discuss the considerations within forwarded documents.	
Harborough District Council (HDC)	28 <sup>th</sup> October 2021	Please note these are Officer comments.	Noted.  The Council would like to thank Harborough District Council for taking time to read through the consultation document and for responding.
Harborough District Council (HDC)	28 <sup>th</sup> October 2021	<p><b>Part 01: Introduction and next steps</b></p> <p><b>Introduction</b> No comment</p> <p><b>Relationship to other plans, guidance and policies</b> Leicester and Leicestershire have a long history of working together on planning matter.</p> <p>The SGP and ongoing collaborative work are examples of this. HDC welcomes Oadby and Wigston’s commitment to exploring opportunities for joint working on key evidence to support the Local Plan. A shared understanding of development need and impacts, especially where impacts and mitigation needed cross LPA boundaries, will be important to ensure effective management of sustainable new development.</p> <p><b>Promoting sustainable development and combating climate change</b></p>	Noted.

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		<p>HDC supports the importance given to climate change as an issue.</p> <p><b>The key challenges and potential options</b> See detailed comments below</p>	
Harborough District Council (HDC)	28 <sup>th</sup> October 2021	<p><b>Part 02: Overarching Policy Areas</b></p> <p><b>The Plan period and cooperation</b> HDC welcomes the commitment to engaging with the Leicester and Leicestershire local authorities, particularly the borough's direct neighbours, as part of the Duty to Cooperate and to the preparation of Statements of Common Ground where appropriate. Clarity around the new Local Plan's timeframe (to 2041) is also welcomed and supported given that the joint evidence currently underway covers that period.</p> <p><b>Where should development go?</b> HDC looks forward to working with the Council in respect of identifying cross-boundary issues in the selection of an appropriate development strategy.</p>	Noted.
Harborough District Council (HDC)	28 <sup>th</sup> October 2021	<p><b>Part 03: Strategic Housing</b></p> <p><b>Housing Need</b> HDC welcomes the ongoing commitment to joint working across Leicester and Leicestershire on the issue of housing need. We are keen to fully understand any concerns around any constraints to supply and ensure it can be robustly</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>Local planning authorities in the Housing Market</p>

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		<p>evidenced that Oadby and Wigston is making the maximum contribution possible to meeting housing supply, be that its own and/or a contribution to Leicester's unmet need.</p> <p><b>Housing Density</b> HDC is supportive of efforts to ensure the housing density is maximised, ensuring the efficient use of land.</p> <p><b>Affordable housing</b> HDC is supportive of measures to maximise the delivery of affordable housing. Consideration of the local income to local house price ratio is a key component of considering affordability.</p> <p><b>Gypsy and traveller need</b> The housing needs of Gypsy and Travellers is an important consideration for planning policy. HDC welcomes ongoing efforts to work to better understand the needs of this group, and ensure the needs are met where they occur. There is a recognised need for transit pitches in Leicestershire and we would be keen to understand what role Oadby and Wigston could play in helping to meet this need, and the wider housing needs of this community.</p> <p><b>Older persons housing</b> Provision of both housing for older people and working age adults with specialist needs is important. HDC welcomes the focus on this issue and the commitment to joint working through the new HENA for Leicester and Leicestershire which is currently being prepared. The findings of the new HENA will</p>	<p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects of these sections have been noted and will be considered accordingly.</p>

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		need to inform the Local Plan. HDC would welcome further dialogue on how to meet specialist housing where the need for a scheme is generated by people in more than one LPA area.	
Harborough District Council (HDC)	28 <sup>th</sup> October 2021	<p><b>Part 04: Employment</b></p> <p><b>Employment need</b> HDC is supportive of all local authorities within Leicester and Leicestershire working together to assess employment land need. Accordingly, HDC supports the outputs of the HENA being used to specify the employment needs of O&amp;W borough.</p> <p><b>Identified Employment Areas (new and existing)</b> HDC recognises the importance of protecting existing employment areas to enable them to evolve and maintain sustain businesses and jobs. Appropriate protection (by category) is a necessary part of any approach to planning for future employment need to prevent loss or the displacement of B class uses to less sustainable locations or potentially neighbouring districts.</p>	Noted.
Harborough District Council (HDC)	28 <sup>th</sup> October 2021	<p><b>Part 05: Economy</b></p> <p><b>Retail hierarchy</b> Setting a hierarchy and enabling centres to evolve and accommodate a range of main town centre uses in a manner appropriate to their role and function, is supported.</p> <p><b>Retail need</b> No comment</p>	Noted.

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		<p><b>Town and District centre and their boundaries</b> No comment</p> <p><b>Local Centres</b> No comment</p>	
Harborough District Council (HDC)	28 <sup>th</sup> October 2021	<p><b>Part 06: Green Infrastructure</b></p> <p><b>Green infrastructure</b> HDC supports the maintenance of the current Local Plan policy on Green Infrastructure, however any amendments should incorporate relevant requirements of the Environment Bill, as well as current national planning policy guidance.</p> <p><b>Green wedges</b> The changing context around housing need (emerging new HENA outcomes, higher LHN requirement due to city uplift, as yet unquantified unmet need from Leicester City) combined with “consistent struggles to meet its housing requirement in full” (para 4.9 of the consultation document), pose significant challenges. Therefore, it could be beneficial to consider a Green Wedge Review, not only to prioritise areas for protection, but to ensure that the Green Wedges still serve their stated functions. HDC would welcome the opportunity to contribute to any such as review especially where Green Wedges cross our shared boundary.</p> <p><b>Countryside</b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>



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		<p>The current policy defaults to the requirements of the NPPF with regards development in countryside, and whilst effective now, the changing context around housing need combined with “consistent struggles to meet its housing requirement in full” (para 4.9 of the consultation document), pose significant challenges (emerging new HENA outcomes, higher LHN requirement due to city uplift, as yet unquantified unmet need from Leicester City). Therefore, it could be beneficial to consider the introduction of a policy for affordable housing on rural exception sites.</p> <p><b>Sustainable drainage and surface water</b> No comments.</p> <p><b>Flood risk</b> A review and update of the Borough’s existing SFRA is supported; outcomes should be considered with regards to whether the policy should be “rolled forward”, replaced, or removed with a to default to national policy and guidance.</p>	<p>The specific recommendations to improve and strengthen the relevant aspects of these sections have been noted and will be considered accordingly.</p> <p>In addition, the suggestion for collaborative work on cross-boundary issues has also been noted and welcomed. Further discussions will be necessary between OWBC and HDC as the two LPAs emerging new Local Plans progress.</p>
Harborough District Council (HDC)	28 <sup>th</sup> October 2021	<p><b>Part 07: Environment and Sustainability</b></p> <p><b>Habitats and biodiversity</b> No alternative methods to measure BNG to suggest. HDC supports the application of Natural England’s standardised approach, to enable smooth processes, both from a DtC perspective as well as to avoid unnecessary delays / appeals caused by potential challenges to any ‘alternative’ BNG measurement.</p>	Noted.

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p><b>Climate change</b> The Borough's approach to managing climate change through planning could potentially be rolled forward, taking account of up-to-date national planning policy and guidance. HDC supports the importance given to climate change as an issue.</p>	
Harborough District Council (HDC)	28 <sup>th</sup> October 2021	<p><b>Part 08: Infrastructure</b></p> <p><b>Highway capacity</b> HDC are supportive of the decision to await the outcome of the joint Strategic Transport Assessment for Leicester and Leicestershire that will identify strategic transport need for each local authority.</p> <p>HDC also support the idea of working with neighbouring authorities to produce more localised evidence to underpin the new local plan.</p> <p>HDC would prefer the Council and the County Council (as the local highways authority) to be seeking delivery of larger scale transport and highway interventions in an attempt to reduce the current levels of congestion within the Borough area rather than 'shifting' the congestion elsewhere and potentially into neighbouring districts.</p> <p><b>Highway infrastructure need</b> HDC support seeking contributions from sites to support strategic highway infrastructure.</p> <p><b>Sustainable transport</b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, Policy and Guidance.</p> <p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p>HDC support the principle of a local policy that actively promotes and encourages sustainable transport. This could enable extended sustainable transport links to be made between Leicester and Harborough district to follow commuting patterns and ensure they are more viable and deliverable.</p> <p><b>Developer contributions</b> On sites that cross the boundary into Harborough District, HDC would like to be able to spend the relevant proportion of any developer contributions for the benefit of residents of the District. Similarly where the impacts of development cross boundaries mitigation may be required in locations outside of Oadby and Wigston LPA area.</p> <p><b>Viability</b> No comments</p> <p><b>High quality communications</b> No comments.</p> <p><b>Education</b> No comments.</p> <p><b>Walking and cycling infrastructure</b> HDC supports the approach that the Council will continue to work closely with the County Council and neighbouring authorities to ensure that there is both a local and strategic approach to walking and cycling infrastructure. There is</p>	<p>strengthen the relevant aspects of these sections have been noted and will be considered accordingly.</p> <p>In addition, the suggestion for collaborative work on cross-boundary issues has also been noted and welcomed. Further discussions will be necessary between OWBC and HDC as the two LPAs emerging new Local Plans progress.</p>

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		<p>potential to link this issue to the wider health and wellbeing agenda.</p> <p><b>Public transport</b> No comments</p>	
Harborough District Council (HDC)	28 <sup>th</sup> October 2021	<p><b>Part 09: Local Housing</b></p> <p><b>First Homes</b> HDC recognises the challenges the requirement for First Homes presents and the knock-on implications for other affordable housing tenures.</p> <p><b>Technical housing standards</b> HDC would support efforts to ensure new housing is of the right standard including considering the implications of COVID and climate change</p> <p><b>Self and custom build</b> HDC recognises the importance that Government places on the delivery of plots for self-build and custom-house building. The inclusion of a requirement for plots in locations suitable for housing development would be supported, although the geography of Oadby and Wigston and its close relationship to Harborough and Leicester means this may be a cross-boundary issue, as the area of search for people wishing to self-build may not correlate with LPA boundaries.</p> <p><b>Sustainable homes</b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and</p>

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		<p>HDC would support efforts to ensure new housing is of the right standard including considering the implications of COVID and climate change. It is important new housing is future proofed.</p> <p><b>Housing choices</b> The provision of a wide range of housing size types and tenures including for older people and working age adults with specialist needs is important. HDC welcomes the focus on this issue and the commitment to joint working through the new HENA for Leicester and Leicestershire which is currently being prepared. The findings of the new HENA will need to inform the Local Plan. HDC would welcome further dialogue on how to meet specialist housing where the need for a scheme is generated by people in more than one LPA area.</p> <p><b>Urban infill</b> HDC welcomes the ongoing commitment to joint working across Leicester and Leicestershire on the issue of housing need. We are keen to fully understand any concerns around any constraints to supply and ensure it can be robustly evidenced that Oadby and Wigston is making the maximum contribution possible to meeting housing supply, be that its own and/or a contribution to Leicester's unmet need.</p>	<p>strengthen the relevant aspects of these sections have been noted and will be considered accordingly.</p> <p>In addition, the suggestion for collaborative work on cross-boundary issues has also been noted and welcomed. Further discussions will be necessary between OWBC and HDC as the two LPAs emerging new Local Plans progress.</p>
Harborough District Council (HDC)	28 <sup>th</sup> October 2021	<p><b>Part 10: Design and Character</b></p> <p><b>High quality design</b> No comments.</p>	Noted.

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		<p><b>High quality construction and use of materials</b> No comments.</p> <p><b>Landscape and character</b> No comments.</p> <p><b>Local green spaces</b> No comments.</p> <p><b>Design codes</b> No comments.</p> <p><b>Renewable and low carbon energy production</b> No comments.</p> <p><b>Public realm</b> No comments.</p> <p><b>Shop fronts (including shutters)</b> No comments.</p>	
Harborough District Council (HDC)	28 <sup>th</sup> October 2021	<p><b>Part 11: Economy, Retail and Leisure</b></p> <p><b>Cafes, restaurants etc (night time economy and dwell time)</b> No comments</p> <p><b>Delivering retail</b> Given the issues and challenges identified in para. 4.16, HDC considers that an update to the evidence should underpin the</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>Local planning authorities in the Housing Market Area (HMA) have mechanisms in place that enable joint working and addressing such matters under the</p>

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		<p>new Local Plan's approach to delivering retail development. This new evidence would feed into the emerging overall development strategy (i.e. the location of new development) and consider potential cross-boundary impacts.</p> <p><b>Local impact threshold</b> HDC is supportive of the preparation of up-to-date evidence in respect of town centres/retail need. The appropriateness of local thresholds could be reviewed as part of this process.</p> <p><b>Primary and secondary frontages</b> No comments.</p> <p><b>Tourism</b> In developing an appropriate policy approach to promoting tourism, potential cross-boundary impacts and opportunities would need consideration.</p>	<p>Duty to Co-operate and regular reviews of a Statement of Common Ground.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects of these sections have been noted and will be considered accordingly.</p> <p>In addition, the suggestion for collaborative work on cross-boundary issues has also been noted and welcomed. Further discussions will be necessary between OWBC and HDC as the two LPAs emerging new Local Plans progress.</p>
Harborough District Council (HDC)	28 <sup>th</sup> October 2021	<p><b>Part 12: Health and Well-being</b></p> <p><b>Open space, sport and recreation facilities</b> HDC is supportive of an evidence-based approach to s106 contributions, both on-site and off-site, for sport and leisure</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping</p>

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		<p>and recreation where these comply with the CIL tests. We would welcome joint working to consider how best to meet needs arising, including any from beyond the boundaries of Oadby and Wigston. It should be recognised that residents of new development may travel beyond LPA boundaries to access facilities.</p> <p><b>Built leisure facilities</b> HDC is supportive of an evidence-based approach to s106 contributions, both on-site and off-site, for built leisure facilities where these comply with the CIL tests. We would welcome joint working to consider how best to meet needs arising, including beyond the boundaries of Oadby and Wigston. It should be recognised that residents of new development may travel beyond LPA boundaries to access facilities.</p> <p><b>Built health facilities</b> HDC is supportive of an evidence-based approach to s106 contributions, both on-site and off-site, for sport and leisure and recreation where these comply with the CIL tests. We would welcome joint working to consider how best to meet needs arising, including beyond the boundaries of Oadby and Wigston. It should be recognised that residents of new development may travel beyond LPA boundaries to access facilities.</p> <p><b>Health impact assessments</b> HDC supports the use of HIA both to support applications and as a process to help with the development of policy options.</p>	<p>to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects of these sections have been noted and will be considered accordingly.</p> <p>In addition, the suggestion for collaborative work on cross-boundary issues has also been noted and welcomed. Further discussions will be necessary between OWBC and HDC as the two LPAs emerging new Local Plans progress.</p>



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Harborough District Council (HDC)	28 <sup>th</sup> October 2021	<p><b>Part 13: Local Services</b></p> <p><b>Car parking and electric vehicle car parking</b> No comments.</p> <p><b>Community facilities</b> No comments.</p> <p><b>Cemetery and burial space</b> No comments.</p>	Noted.
Harborough District Council (HDC)	28 <sup>th</sup> October 2021	<p><b>Part 14: Heritage</b></p> <p>HDC appreciates that the proximity of the Stoughton Grange direction for growth allocation to HDC's Stoughton Conservation Area has been recognized and that the plan states that all heritage assets will need to be considered and protected through any proposed development in the growth area. HDC welcomes the opportunity for involvement on the protection of the Stoughton Conservation Area.</p> <p><b>Conservation areas</b> HDC supports the Plan's policies 40 (Culture and Historic Environment Assets) and 41 (Development in the Conservation Area) which seek to preserve and enhance the Borough's conservation areas and protect them from unacceptable development. Re-assessment of the existing conservation areas would ensure that they continue to meet the criteria for designation. Such work would provide clear</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects of these sections have been noted and will be considered accordingly.</p> <p>In addition, the suggestion for collaborative work on</p>

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		<p>evidence of any conservation areas no longer worthy of designation.</p> <p><b>Listed buildings and locally listed buildings</b>                      A local list of heritage assets is a way for councils and communities to identify and celebrate the heritage assets which enrich their local area. HDC supports such recognition of the Borough's local heritage assets. To maintain the quality and integrity of the list, HDC would recommend undertaking a review of the Schedule of Locally Listed Buildings to ensure that it still appropriately reflects the unique historic character and cultural identity of the Borough.</p>	<p>cross-boundary issues has also been noted and welcomed. Further discussions will be necessary between OWBC and HDC as the two LPAs emerging new Local Plans progress.</p>
Harborough District Council (HDC)	28 <sup>th</sup> October 2021	<p><b>Part 15: Masterplanning</b></p> <p><b>Large scale change and place making</b>                      No comments.</p>	Noted.
Harborough District Council (HDC)	28 <sup>th</sup> October 2021	<p><b>New Local Plan SA Scoping Report</b></p> <p><b>SA Scoping Report</b>                      No comments.</p>	Noted.

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Hinckley and Bosworth Borough Council (HBBC)	15 <sup>th</sup> October 2021	<p>Thank you for consulting Hinckley and Bosworth Borough Council (HBBC) on the Oadby and Wigston Borough Council (OWBC) Local Plan Issues and Options document. It is noted that the Plan is at an early stage of development and a preferred options document will be consulted on from May to June 2022, following this consultation. We look forward to continuing a positive and productive dialogue between our two authorities and the wider Housing Market Area (HMA) to help progress our plans. Please find below HBBC's response to the Issues and Options document, which addresses key parts which are most relevant to Hinckley &amp; Bosworth borough.</p>	<p>Noted.</p> <p>The Council would like to thank Hinckley and Bosworth Borough Council (HBBC) for taking time to read through the consultation document and for responding.</p>
Hinckley and Bosworth Borough Council (HBBC)	15 <sup>th</sup> October 2021	<p><b>Duty to cooperate: part 02</b></p> <p>HBBC consider that OWBC have engaged constructively, actively, and on an ongoing basis with partners including neighbouring authorities, the County Council, the LLEP (Leicester and Leicestershire Enterprise Partnership), and other relevant bodies. The Strategic Growth Plan is a testament to the joint commitment across Leicester and Leicestershire to plan for long term growth through an agreed, proactive, and collaborative approach.</p> <p>All ten partners are signatories to a Joint Position Statement relating to Leicester's housing and employment land needs, published in September 2020. This sets out how authorities will continue to work together to accommodate a potential unmet need for housing and employment land identified in the draft Leicester Local Plan. In December 2020, the standard</p>	<p>Noted.</p>

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		<p>methodology for calculating housing need was revised and this led to a significant increase in housing need for the city of Leicester (35% uplift). The housing need for the other authorities in Leicestershire remained unchanged. As a result of this significant increase in the housing figure for the City, further additional work is required across the Leicester and Leicestershire Housing Market Area to inform the apportionment of unmet need arising from Leicester.</p> <p>HBBC support the approach set out in part 02, paragraph 4.8, of the document, which states that OWBC will engage with all Leicester and Leicestershire local authorities and produce a number of Statements of Common Ground. A Leicester and Leicestershire Housing Market Area Statement of Common Ground(s) is seen as the most effective method to address strategic cross-boundary housing and employment issues, such as dealing with Leicester City's declared unmet need. A joint Statement is currently being prepared and will be submitted to each local authority within Leicester and Leicestershire for agreement.</p>	
Hinckley and Bosworth Borough Council (HBBC)	15 <sup>th</sup> October 2021	<p><b>Housing Need and growth: Parts 02 and 03</b></p> <p>It is recognised that the local plan for Oadby and Wigston is at an early stage of development and that this consultation document sets out various options for the scale and location of growth in the borough.</p> <p>It is recognised that the borough has particular challenges related to its compact and highly urbanised nature. This</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>Local planning authorities in the Housing Market Area (HMA) have mechanisms in place that enable joint working and addressing such matters under the</p>

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		<p>impacts both the scale and form of future growth in the borough.</p> <p>In terms of housing growth, HBBC would support an approach based on using the Standard Method for calculating housing need as a starting point for establishing a housing requirement for the borough. The Housing and Employment Needs Assessment (HENA) jointly being prepared by the Leicester and Leicestershire authorities will form part of the evidence base for the local plan (and for all the local plans across the Housing Market Area) and should be a consideration when assessing the housing requirement for the borough to move on from the Standard Method housing need start point.</p> <p>With regard to Leicester City's unmet need, this will be a joint duty of cooperation matter for determination between the Leicestershire authorities through the Statement of Common Ground process, as discussed above. It is recognised that the borough's characteristics – in particular its compact size, urbanised nature, and limited greenfield options - will be considerations in the amount of housing the borough could sustainably accommodate during the plan period.</p>	<p>Duty to Co-operate and regular reviews of a Statement of Common Ground.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Hinckley and Bosworth Borough Council (HBBC)	15 <sup>th</sup> October 2021	<p><b>Housing Density: Part 03</b></p> <p>The potential options given are to (1) roll forward the current minimum densities (50dph, 40dph or 30dph depending on location), (2) decrease or increase the densities, and (3) have a single target across the borough area.</p>	<p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>Local planning authorities in the Housing Market Area (HMA) have mechanisms in place that enable</p>

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		<p>In the context of evidence indicating an increasing housing need for the borough, HBBC would be concerned if decreases in density requirements were proposed because this would effectively increase the quantity of land needed to meet the housing need/requirement, and consequently make the task of meeting the housing requirement more challenging.</p>	<p>joint working and addressing such matters under the Duty to Co-operate and regular reviews of a Statement of Common Ground.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
<p>Hinckley and Bosworth Borough Council (HBBC)</p>	<p>15<sup>th</sup> October 2021</p>	<p><b>Employment Need: Part 04</b></p> <p>HBBC supports the approach to assessing employment needs through the joint HENA study. The study will provide a consistent approach to employment needs across the Leicester and Leicestershire area.</p>	<p>Noted.</p>
<p>Hinckley and Bosworth Borough Council (HBBC)</p>	<p>15<sup>th</sup> October 2021</p>	<p><b>Green Infrastructure: Part 06</b></p> <p>HBBC are supportive of the net gain in green infrastructure approach and recognise the need to review the policy to ensure that it is up-to-date with national policy.</p> <p>Have OWBC considered looking at incorporating Building with Nature Standards into the Green Infrastructure Policy?</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping</p>

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		<p>Building with Nature is a framework of Standards for good green infrastructure. It brings together existing guidance and good practice to recognise high-quality green infrastructure at all stages of the development process including policy, planning, design, delivery, and long-term management and maintenance.</p>	<p>to inform policies related to all aspects of the Plan.</p> <p>The specific recommendations to improve and strengthen the relevant aspects of these sections have been noted and will be considered accordingly.</p> <p>Specifically, the Council will be looking at incorporating Building with Nature Standards into the Green Infrastructure Policy.</p>
<p>Hinckley and Bosworth Borough Council (HBBC)</p>	<p>15<sup>th</sup> October 2021</p>	<p><b>Green Wedges: Part 06</b></p> <p>Since Green Wedge policies were introduced in the Leicestershire Structure Plan in 1987, they have remained an important policy tool guiding development across the HMA. HBBC support a strong approach to Green Wedges as a policy tool to prevent the merging of settlements, to guide development form, to provide a green lung into urban areas and to provide a recreational resource. HBBC support the retention of green wedges as a policy tool, although highlight the need to have an up-to-date evidence base which may result in the need for an updated Green Wedge Review to inform the Local Plan.</p>	<p>Noted.</p>
<p>Hinckley and Bosworth Borough Council (HBBC)</p>	<p>15<sup>th</sup> October 2021</p>	<p><b>Habitats and Biodiversity: Part 07</b></p> <p>HBBC support the use of Natural England’s Biodiversity Metric 3.0. The Biodiversity Metric 3.0 can be used to measure gains and losses to biodiversity resulting from development. The</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance, including the Environment Bill.</p>

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		metric has been tested and will ensure consistency across the plan area.	<p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan, including Biodiversity Net Gain.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Hinckley and Bosworth Borough Council (HBBC)	15 <sup>th</sup> October 2021	<p><b>Climate Change: Part 07</b></p> <p>Spatial planning is a key tool in aiding local authority's ability to deliver net zero. Local Planning Authorities in England are bound by a legal duty to ensure that planning policy contributes to the mitigation and adaptation of climate change alongside sustainable development. The climate change agenda should be integrated and embedded into the Local Plan. OWBC should ensure that a place-based approach is taken to deliver the climate change agenda ensuring that local conditions and priorities are met.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance, including the Environment Bill.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan, including tackling Climate Change.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>



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House Builders Federation (HBF)	29 <sup>th</sup> October 2021	<p><b>Introduction</b></p> <p>Thank you for consulting with the Home Builders Federation (HBF) on the above-mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. The HBF submit the following responses to specific questions in the Council's Issues &amp; Options consultation document.</p>	<p>Noted.</p> <p>The Council would like to thank the House Builders Federation (HBF) for taking time to read through the consultation document and for responding.</p>
House Builders Federation (HBF)	29 <sup>th</sup> October 2021	<p><b>OVERARCHING POLICY AREAS (STRATEGIC CHALLENGES)</b></p> <p><i>Is the suggested Local Plan time period of 'date of adoption to the year 2041' appropriate?</i></p> <p>The proposed plan end date of 2041 is appropriate. As set out in the 2021 National Planning Policy Framework (NPPF), strategic policies should look ahead over a minimum 15 years period from the date of adoption, to anticipate and respond to long-term requirements and opportunities (para 22).</p>	<p>Noted.</p>
House Builders Federation	29 <sup>th</sup> October 2021	<p><b><i>Who should be the key stakeholders that the Council enters into Statements of Common Ground (SoCG) with?</i></b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance</p>

**Appendix A: Representations received during the Regulation 18A Issues and Options Local Plan Public Consultation 2021 (with Officer Responses)**

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(HBF)		<p>Oadby &amp; Wigston is part of the Leicester &amp; Leicestershire Housing Market Area (L&amp;LHMA). Leicester has an unmet housing need, which is to be redistributed across the L&amp;LHMA by agreement with neighbouring authorities. The Council should engage in collaborative working with other L&amp;LHMA authorities to produce a SoCG, which sets out the quantum of Leicester's unmet housing needs (based on the revised standard methodology including the Cities &amp; Urban Centres 35% uplift) and where unmet housing needs will be met by neighbouring authorities.</p> <p>To provide communities and other stakeholders with a transparent picture of collaboration, the National Planning Practice Guidance (NPPG) sets out that authorities should have a SoCG available on their website by the time of publication of their Draft Plan. Once published, the Council will need to ensure that any SoCG continues to reflect the most up-to-date position of joint working (ID 61-020-20190315).</p>	<p>with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p>
House Builders Federation (HBF)	29 <sup>th</sup> October 2021	<p><b>HOUSING (STRATEGIC CHALLENGES)</b></p> <p><b>Housing Need</b></p> <p><i><b>Is there any robust evidence to suggest that the Council should continue to use the current housing requirement of 148 new homes per year set out within the current Local Plan?</b></i></p> <p>There is no evidence to suggest that the Council should continue to use the adopted housing requirement figure of 148</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p>dwelling per annum. As set out in the 2021 NPPF, 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 (para 66). The determination of the minimum number of homes needed should be informed by Local Housing Needs (LHN) assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 61).</p>	<p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
House Builders Federation (HBF)	29 <sup>th</sup> October 2021	<p><b><i>Should the Council use the housing need figure of 180 new homes per year calculated by the Standard Method?</i></b></p> <p>The NPPG sets out the standard methodology for calculating the LHN figure using demographic data (based on 2014 MHCLG Sub National Household Projections (SNHP)), an affordability adjustment (based on the latest ONS affordability ratios) and a Cities &amp; Urban Centres uplift of 35% (ID 2a-004-20201216). Using the standard methodology, the minimum LHN for Oadby &amp; Wigston is 180 dwellings per annum based on 2014 SNHP, 2021 as the current year and 2020 affordability ratio of 9.35. As set out in the NPPG, the LHN is calculated at the start of the plan-making process but this number should be kept under review and when appropriate revised until the Local Plan is submitted for examination (ID 2a-008-20190220). The minimum LHN may change as inputs are variable.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
			and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.
House Builders Federation (HBF)	29 <sup>th</sup> October 2021	<p><b><i>What should the Council do if the HENA outcomes suggests that there should be a diversion from the Standard Method?</i></b></p> <p>The NPPG clearly states that the standard methodology is the minimum starting point in determining the number of homes needed. The 2021 NPPF seeks to achieve sustainable development by pursuing economic, social and environmental objectives in mutually supportive ways (para 8). The Council should be seeking to achieve a sustainable balance between employment and housing growth. The NPPG explains that “circumstances” may exist to justify a figure higher than the minimum LHN. The “circumstances” for increasing the minimum LHN are listed in the NPPG including, but not limited to, situations where increases in housing need are likely to exceed past trends because of growth strategies, strategic infrastructure improvements, agreeing to meet unmet need from neighbouring authorities or previous levels of housing delivery / assessments of need, which are significantly greater than the outcome from the standard methodology (ID 2a-010-2001216). When preparing the HENA, the Council should considered whether such “circumstances” exist.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
House Builders	29 <sup>th</sup> October 2021	<p><b><i>Should the Borough area be taking any of Leicester City’s declared unmet housing need?</i></b></p>	Noted.

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Federation (HBF)		Oadby & Wigston is part of the L&LHMA. Leicester has an unmet housing need, which is to be redistributed across the L&LHMA by agreement with neighbouring authorities. The Council should be working collaboratively with other L&LHMA authorities to meet Leicester's unmet housing needs (also see HBF answer above under Overarching Policy Areas).	<p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p>
House Builders Federation (HBF)	29 <sup>th</sup> October 2021	<p><b>Housing density</b></p> <p><b><i>Should the Council 'roll forward' the current Local Plan policy relating to housing density ensuring that it is up-to-date with national policy and guidance?</i></b></p> <p>Adopted Policy 12 – Housing Densities should be reviewed for compliance with the 2021 NPPF and the latest NPPG.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p>
House Builders Federation (HBF)	29 <sup>th</sup> October 2021	<p><b>Should the Council be seeking to increase / decrease the minimum density targets in the new Local Plan?</b></p> <p>If the Council is seeking to increase or decrease minimum density targets, the setting of residential density standards should be undertaken in accordance with the 2021 NPPF</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p>(para 125), whereby in the circumstances of an existing or anticipated shortage of land for meeting identified housing needs then a minimum net density in suitable locations such as town centres and those benefiting from good public transport connections may be appropriate. However, “town cramming” should be avoided, there will be a limited capacity for higher densities and more taller buildings, which will only be appropriate in certain locations. The intensification or densification of housing densities should be in keeping with the character of the surrounding area.</p>	<p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
House Builders Federation (HBF)	29 <sup>th</sup> October 2021	<p><b><i>Should the Council be applying a single density target across the Borough area?</i></b></p> <p>Adopted Policy 12 sets out a differentiated approach of 30, 40 and 50 dwellings per hectare to housing densities across the Borough. The nuanced policy approach to residential densities in adopted Policy 12 is more appropriate than a single housing density target. A single housing density target across the Borough area would be inappropriate as a range of differing densities is needed to ensure development is in keeping with the character of the surrounding area and to provide sufficient variety in house typologies to create balanced communities with the right types of new homes to meet the housing needs of different groups.</p>	Noted.
House Builders Federation (HBF)	29 <sup>th</sup> October 2021	<b>Affordable housing</b>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations,</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p><b><i>Should the Council 'roll forward' the current Local Plan policy relating to affordable housing ensuring that it is up-to-date with national policy and guidance?</i></b></p> <p>Adopted Policy 13 – Affordable Housing should be reviewed for compliance with the 2021 NPPF and the latest NPPG. The qualifying threshold for sites providing affordable housing should reflect the definition of major development set out in the 2021 NPPF. The Council's affordable housing tenure mix should also reflect the 2021 NPPF expectation that at least 10% of homes will be available for affordable home ownership (para 65) and the 24 May 2021 Written Ministerial Statement requirement for 25% of affordable housing to be First Homes with further detail on implementation provided in the latest NPPG.</p>	<p>policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects of these sections have been noted and will be considered accordingly.</p>
House Builders Federation (HBF)	29 <sup>th</sup> October 2021	<p><b><i>Should the Council be applying a single Borough wide percentage target and policy approach?</i></b></p> <p>Adopted Policy 13 sets out a differentiated approach to affordable housing across the Borough with 30% sought in Oadby, 20% in Wigston and in 10% South Wigston. Before seeking to applying a single Borough wide percentage target or an increase or decrease to the adopted minimum affordable housing percentage targets, the Council should undertake robust assessments of affordable housing need and viability.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage</p>

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		<p>The HENA should establish the Borough’s affordable housing needs. As set out in the NPPG, households whose needs are not met by the market, which are eligible for one or more of the types of affordable housing set out in the definition of affordable housing in Annex 2 of the 2021 NPPF, are considered in need of affordable housing (ID 67-005-20190722). Total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments. As set out in the NPPG, an increase in the total housing figures may be considered where it could help deliver affordable housing (ID 2a-024-20190220). It is acknowledged that the Council may not be able to meet all affordable housing needs but a housing requirement above the minimum LHN will make a greater contribution to delivering more affordable housing.</p> <p>In plan-making, viability is inseparable from the deliverability of development. The viability of individual developments and plan policies should be tested at the plan making stage. As set out in the 2021 NPPF, the contributions expected from development including the level &amp; types of affordable housing provision required and other infrastructure should be set out in the Local Plan (para 34). As stated in the 2021 NPPF, development should not be subject to such a scale of obligations that the deliverability of the Local Plan is threatened (para 34). Without a robust approach to viability assessment, the Local Plan will be unsound, land will be withheld from the market and housing delivery targets will not be achieved.</p>	<p>and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects of these sections have been noted and will be considered accordingly.</p>



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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
House Builders Federation (HBF)	29 <sup>th</sup> October 2021	<p><b>Older persons housing</b></p> <p><b><i>Should the Council require applicants to provide older persons housing and / or accommodation, on all development sites regardless of size or on only large development sites that meet the NPPF definition of major development?</i></b></p> <p>A requirement to provide older persons housing on all or only large development sites is inappropriate. Older persons housing is a diverse sector covering extra care, sheltered housing, retirement living, bungalows etc., the Council will have to set out its precise definition of type of older persons housing sought. Not all sites will be able to accommodate such housing because of site size, proposed development typology, site specific circumstances and viability. The Council’s policy approach should be flexible and proportionate to the size of site.</p> <p>A requirement to provide older persons housing on all or only large development sites will affect viability because the financial dynamics of older persons housing are different to general housing. Build costs are higher due to specific design criteria suited to the needs of older people, a greater gross to net floor area for non-saleable shared facilities, elongated construction / sales periods and cashflows as no individual units can be occupied until communal areas are completed, which means substantial upfront investment before any return on capital is received.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p>The Council should ensure that appropriate sites are allocated to meet the housing needs of specifically identified groups of households rather than relying on an overly prescriptive policy approach of specifying housing mixes for individual sites. The Local Plan should ensure that suitable sites are available for a wide range of different types of development across a wide choice of appropriate locations. The Council should consider allocating sites for older persons subject to criteria such as the proximity of sites to public transport, local amenities, health services and town centres.</p>	
House Builders Federation (HBF)	29 <sup>th</sup> October 2021	<p><b><i>Should the Council be considering the housing needs for younger persons as well as the housing needs for older persons?</i></b></p> <p>As set out in the 2021 NPPF, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (para 62). All households should have access to different types of dwellings to meet their housing needs, the Council should be considering the housing needs of both younger and older persons.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects of these sections</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
			have been noted and will be considered accordingly.
House Builders Federation (HBF)	29 <sup>th</sup> October 2021	<p><b>INFRASTRUCTURE (STRATEGIC CHALLENGES)</b></p> <p><b>Viability</b></p> <p><i>Should the Council 'roll forward' the current Local Plan policy relating to Infrastructure and Developer Contributions ensuring that it is up-to-date with national policy and guidance that takes into account the requirement to develop a whole Plan Viability Assessment?</i></p> <p>Adopted Policy 46 - Infrastructure and Developer Contributions should be reviewed for compliance with the 2021 NPPF and the latest NPPG.</p>	Noted.
House Builders Federation (HBF)	29 <sup>th</sup> October 2021	<p><i>Should the Council seek to develop a new Policy approach to meeting its infrastructure and developer contribution needs that takes into account the requirement to develop a whole Plan Viability Assessment?</i></p> <p>As Local Plan preparation progresses, the Council should proactively engage with all key stakeholders including developers to produce a Whole Plan Viability Assessment.</p> <p>In plan-making, viability is inseparable from the deliverability of development. At Examination, viability will be a key issue in</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage</p>

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		<p>determining the soundness of the Local Plan. The viability of individual developments and plan policies should be tested at the plan making stage. As set out in the 2021 NPPF, the contributions expected from development including the level &amp; types of affordable housing provision required and other infrastructure for education, health, transport, flood &amp; water management, open space, digital communication, etc. should be set out in the Local Plan (para 34). As stated in the 2021 NPPF, development should not be subject to such a scale of obligations that the deliverability of the Local Plan is threatened (para 34). Viability assessment should not be conducted on the margins of viability. Without a robust approach to viability assessment, the Local Plan will be unsound, land will be withheld from the market and housing delivery targets will not be achieved.</p> <p>Viability assessment is highly sensitive to changes in its inputs whereby an adjustment or an error in any one assumption can have a significant impact. Most sites should be deliverable at planning application stage without further viability assessment negotiations. Viability negotiations should occur occasionally rather than routinely. Trade-offs between policy requirements, affordable housing and infrastructure provision should not be necessary. However, if the viability of sites is overstated, policy requirements will be set at unrealistic levels. Landowners and developers will have to submit site-specific assessments to challenge assumptions in the Council's Viability Assessment. Such negotiations at planning application stage causes uncertainty for both the Council and</p>	<p>and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects of these sections have been noted and will be considered accordingly.</p>

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		developers, which may result in significant delay to housing delivery or even non-delivery.	
House Builders Federation (HBF)	29 <sup>th</sup> October 2021	<p><b>HOUSING (LOCAL CHALLENGES)</b></p> <p><b>First homes</b></p> <p><i>Is there robust evidence to suggest that the level of discount should be increased within the Borough area?</i></p> <p>Any increase to the 30% level of discount applicable to First Homes within the Borough should be fully justified by robust evidence.</p>	Noted.
House Builders Federation (HBF)	29 <sup>th</sup> October 2021	<p><b>Technical housing standards</b></p> <p><i>Should the Council require that all new homes provided within the Borough comply with the Governments Technical Housing Standards?</i></p> <p>If the Council wishes to apply optional technical standards for accessible &amp; adaptable homes and / or the Nationally Described Space Standard (NDSS), then this should only be done in accordance with the 2021 NPPF (para 130f &amp; Footnote 49) and the latest NPPG (ID 56-005-20150327 – 56-011-20150327 &amp; 56-020-20150327). The Council should provide a local assessment, which justifies with credible and robust evidence its case. The Council should also acknowledge that implementation of the Government’s proposed changes to Part M of the Building Regulations as set</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>

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		out in the “Raising Accessibility Standards for New Homes” consultation (closed on 1 December 2020) will supersede any proposed policy approach to accessible & adaptable homes.	
House Builders Federation (HBF)	29 <sup>th</sup> October 2021	<p><b>Self and custom build</b></p> <p><b><i>Should the Council ‘roll forward’ the current policy approach set out in Local Plan Policy 14 – Self Build and Custom Build, ensuring that it is up to date with current national planning policy and guidance?</i></b></p> <p>Adopted Policy 14 - Self Build &amp; Custom Build Housing should be reviewed for compliance with 2021 NPPF and latest NPPG.</p>	Noted.
House Builders Federation (HBF)	29 <sup>th</sup> October 2021	<p><b><i>Are there any other options available to the Council that would be appropriate?</i></b></p> <p>The Council should continue to support Self &amp; Custom Build Housing as set out in adopted Policy 14. The NPPG sets out the key role that the Council should play in bringing forward suitable land for self &amp; custom build housing (ID 57-025-20210508). The Local Plan should provide a wide range of different self &amp; custom build housing opportunities across the Borough. Appropriate policy mechanism options include the allocation of small and medium scale sites specifically for self &amp; custom build housing and permitting self &amp; custom build outside but adjacent to settlement boundaries on sustainable sites especially if the proposal would round off the developed form.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>

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		<p>The provision of a percentage of self-build &amp; custom build plots on schemes above a certain size would be an inappropriate policy approach, which adds to the complexity and logistics of development. As well as on-site impracticalities, the inclusion of self-build plots will have a fundamental bearing on the development economics of development, these impacts on viability should be tested and additional costs should be fully accounted for in the Council's Viability Assessment.</p>	<p>The specific recommendations to improve and strengthen the relevant aspects of the Council's approach to the delivery of Self and Custom Build plots has been noted and will be considered accordingly.</p>
<p>House Builders Federation (HBF)</p>	<p>29<sup>th</sup> October 2021</p>	<p><b>Sustainable homes</b></p> <p><b><i>Which of the above potential options do you consider to be the most appropriate?</i></b></p> <p>The most appropriate approach is not requiring any further elements of sustainability (solar photovoltaic energy producing technology, Electric Vehicle Charging Points (EVCPs), ground and / or air source heat pumps, wind energy producing technology, water energy producing technology &amp; grey water recycling) to that expected through the Building Control process (also see HBF answer below under Climate Change).</p> <p>With reference to EVCPs, the HBF recognise that electric vehicles will be part of the solution to transitioning to a low carbon future. As set out in the Department of Transport consultation on Electric Vehicle Charging in Residential &amp; Non-Residential Buildings (ended on 7th October 2019), the Government's preferred option is the introduction of a new requirement for EVCPs under Part S of the Building</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>These specific recommendations to improve and strengthen the relevant aspects of the Plan in relation to making homes more sustainable have</p>

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		<p>Regulations. The inclusion of EVCP requirements within the Building Regulations will introduce a standardised consistent approach to EVCPs in new buildings across the country and supersede a policy approach of providing EVCPs as a Local Plan policy requirement. Until the introduction of proposed changes to Part S of the Building Regulations, the HBF consider that the physical installation of active EVCPs is inappropriate. The evolution of automotive technology is moving quickly therefore a passive cable and duct approach is a more sensible and future proofed solution, which negates the potential for obsolete technology being experienced by householders. A passive cable and duct approach means that the householder can later arrange and install a physical EVCP suitable for their vehicle and in line with the latest technologies.</p>	<p>been noted and will be considered accordingly.</p>
<p>House Builders Federation (HBF)</p>	<p>29<sup>th</sup> October 2021</p>	<p><b>Housing choices</b></p> <p><b><i>Should the Council ‘roll forward’ the current Policy approach set out in Local Plan Policy 11 – Housing Choices, ensuring that it is up to date with current national planning policy and guidance?</i></b></p> <p>Adopted Policy 11 – Housing Choices should be reviewed for compliance with the 2021 NPPF and the latest NPPG.</p> <p>As set out in the 2021 NPPF, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned and take into</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by</p>



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		<p>account relevant market signals (para 31). Therefore, in determining the mix, size and type of housing needed, market signals are as important as evidence contained in the HENA. Policy requirements for the mix, size and type of dwellings should not be overly prescriptive. The Council should adopt a flexible policy approach.</p>	<p>doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects of these sections have been noted and will be considered accordingly.</p>
House Builders Federation (HBF)	29 <sup>th</sup> October 2021	<p><b>DESIGN &amp; CHARACTER (LOCAL CHALLENGES)</b></p> <p><b>Design Codes</b> <i>Which of the above potential options relating to local design codes do you consider to be the most appropriate for the Borough area?</i></p> <p>The Council’s potential options for a policy approach on design codes are :-</p> <ul style="list-style-type: none"> <li>• a smaller number of more generic local design codes covering larger areas of the Borough ;</li> <li>• a larger number of local design codes that are more bespoke covering smaller areas of the Borough ;</li> <li>• high level, illustrative &amp; less prescriptive local design codes rather than more detailed &amp; prescriptive local design codes.</li> </ul> <p>The Council’s policy approach on design should accord with the 2019 NPPF, the latest NPPG, the National Design Guide and National Model Design Code. The preferred policy approach should provide specific local guidance rather than just repeating national policy or guidance.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the Council’s approach into taking account of design codes in new developments have been noted and will be considered accordingly.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
House Builders Federation (HBF)	29 <sup>th</sup> October 2021	<p><b>ENVIRONMENT AND SUSTAINABILITY (STRATEGIC CHALLENGES)</b></p> <p><b>Habitats and Biodiversity</b></p> <p><i>Should the Council ‘roll forward’ the current policy approach set out in Local Plan (relevant parts of) Policy 37 – Biodiversity &amp; Geodiversity, ensuring that it is up to date with current national planning policy and guidance?</i></p> <p>Adopted Policy 37 – Biodiversity &amp; Geodiversity should be reviewed for compliance with the 2021 NPPF and the latest NPPG.</p> <p>The Council’s policy approach to biodiversity net gain should align with the Government’s proposals as set out in the Environment Bill including a mandatory national requirement for 10% biodiversity gain, exemptions and transitional arrangements. In the Government’s opinion, 10% strikes the right balance between the ambition for development and reversing environmental decline whilst providing certainty in achieving environmental outcomes, deliverability of development and costs for developers. As set out in the Environment Bill, the Government will introduce exemptions applicable to the most constrained types of development. The Council should apply proportionality in their application of planning policy. Sites without reasonable opportunities to achieve biodiversity net gain should not face risks of delay through rigid or prescriptive requirements. There will be a</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance, including the Environment Bill.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan, including protecting and enhancing the environment.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the Council’s approach into taking account of biodiversity net gain and viability have been noted and will be considered accordingly.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p>targeted exemption for brownfield sites. The Government also intends to make provision for a transition period of two years. The specifics of this transition period will provide clear and timely guidance on understanding what will be required and when. The Government will consider whether residential developments minor (less than 10 dwellings) should be subject to longer transition arrangements or a lower net gain requirement than other types of development.</p> <p>The Government has also confirmed that more work needs to be undertaken to address viability concerns raised by the housebuilding industry in order that biodiversity net gain does not prevent, delay or reduce housing delivery. There are significant additional costs associated with biodiversity gain, which should be fully accounted for in the Council's Viability Assessment.</p>	
House Builders Federation (HBF)	29 <sup>th</sup> October 2021	<p><b><i>Should the Council be making use of Natural England's Biodiversity Metric, or are there more appropriate ways of calculating biodiversity net gain?</i></b></p> <p>The Council should make use of Natural England's Biodiversity Metric, which is used by the Government (DEFRA) to measure changes to biodiversity under net gain requirements established in the Environment Bill.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance, including the Environment Bill.</p>
House Builders Federation (HBF)	29 <sup>th</sup> October 2021	<p><b>Climate change</b></p> <p><b><i>Should the Council 'roll forward' the current policy approach set out in Local Plan (relevant parts of) Policy</i></b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations,</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p><b>38 – Climate Change, Flood Risk &amp; Renewable Low Carbon Energy, ensuring that it is up to date with current national planning policy and guidance?</b></p> <p>Adopted Policy 38 - Climate Change, Flood Risk &amp; Renewable Low Carbon Energy should be reviewed for compliance with the 2021 NPPF and the latest NPPG.</p>	<p>policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
House Builders Federation (HBF)	29 <sup>th</sup> October 2021	<p><b>Should the Council draft a new Policy to address Climate Change and to take account of up to date national planning policy and guidance?</b></p> <p>A review of adopted Policy 38 and / or any new policy approach should reflect the Government’s intention of setting standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Councils specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The Council should not need to set local energy efficiency standards to achieve the shared net zero goal because of the higher levels of energy efficiency standards for new homes proposed in the 2021 Part L uplift and the Future Homes Standard 2025.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance, including the Environment Bill.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p>

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		<p>Today's new homes are already very energy efficient with lower heating bills for residents in comparison to older existing homes. Energy performance data has shown that 8 out of 10 new build dwellings have an A or B energy efficiency rating, compared to only 3% of existing properties. In November 2019, the average new build buyer in England saved £442.32 every year on heating costs compared to owners of existing dwellings.</p> <p>Nevertheless, the HBF recognise the need to move towards greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable. The Government Response to The Future Homes Standard : 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings dated January 2021 provides an implementation roadmap, the Government's aim is for the interim Part L (Conservation of fuel and power), Part F (Ventilation) &amp; Overheating Regulations to be regulated for in late 2021 and to come into effect in 2022. The 2021 Interim Uplift will deliver homes that are expected to produce 31% less CO2 emissions compared to current standards. To ensure as many homes as possible are built in line with new energy efficiency standards, transitional arrangements will apply to individual homes rather than an entire development and the transitional period will be one year. This approach will support successful implementation of the 2021 Interim Uplift and the wider implementation timeline for the Future Homes Standard from 2025. The Future Homes Standard will ensure</p>	

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		<p>that new homes will produce at least 75% lower CO2 emissions than one built to current energy efficiency requirements. By delivering carbon reductions through the fabric and building services in a home rather than relying on wider carbon offsetting, the Future Homes Standard will ensure new homes have a smaller carbon footprint than any previous Government policy. In addition, this footprint will continue to reduce over time as the electricity grid decarbonises.</p> <p>The HBF support the Government's approach to the Future Homes Standard but there are difficulties and risks to housing delivery given the immaturity of the supply chain for the production / installation of heat pumps and the additional load that would be placed on local electricity networks in combination with Government proposals for the installation of EVCPs in new homes. In autumn 2020, the HBF established a Future Homes Task Force to develop workable solutions for the delivery of the home building industry's contribution to meeting national environmental targets and objectives on Net Zero. Early collaborative work is focussed on tackling the challenges of implementing the 2021 and 2025 changes to Building Regulations successfully and cost-effectively as well as providing information, advice and support for Small Medium Enterprise (SME) developers and putting the customer at the centre of thinking. In July 2021, the Future Homes Delivery Plan – Summary of the goals, the shared roadmap &amp; the Future Homes Delivery Hub was published. To drive and oversee the plan, a new delivery Hub supported by involvement from Government was launched in September</p>	

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		<p>2021. The Hub will help facilitate a sector-wide approach to identifying metrics, more detailed targets (where necessary), methods and innovations to meet the goals and collaborations required with supply chains and other sectors. It will incorporate the needs of all parties including the public and private sector and consumers, so that they can all play their part in delivering environmentally conscious homes that people want to live in (also see HBF answer above under Sustainable Homes).</p>	
Historic England	29 <sup>th</sup> October 2021	<p><b>NEW OADBY &amp; WIGSTON LOCAL PLAN - ISSUES AND OPTIONS and SA</b></p> <p>Thank you for the consultation on the above documents in relation to the emerging Plan. We welcome the opportunity to engage at this early stage.</p> <p>You will note that we have provided comments on key areas at this stage and these are made without prejudice to any future comments we may wish to make on the next iteration of the Plan.</p>	<p>Noted.</p> <p>The Council would like to thank the Historic England for taking time to read through the consultation document and for responding.</p>
Historic England	29 <sup>th</sup> October 2021	<p><b>Part 2 - Overarching Policy Areas (Strategic Challenges)</b></p> <p><b><i>Location of new development</i></b></p> <p>In terms of proposed options for growth Historic England has no particular preference, but can advise that the new Plan will need to demonstrate a positive approach to the historic environment.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and</p>

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		<p>We note the Call for Sites: Sites Collation and Initial Assessment document of Spring 2021, and that some sites which are being taken forward for further assessment through the Plan process have the potential to impact on heritage assets.</p> <p>In respect of the historic environment, we recommend that site assessment work follows the five step approach set out in our HEAN 3 advice: <a href="https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/">https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</a></p> <p>Assessment work should also take setting considerations into account: <a href="https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/">https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</a></p> <p>As a general approach to the historic environment in local plans we would also recommend the advice included in GPA1: <a href="https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/">https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/</a></p>	<p>local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the site assessments with regards to the historic environment have been noted and will be considered accordingly.</p>
Historic England	29 <sup>th</sup> October 2021	<p><b>Part 9 - Local housing</b></p> <p><b><i>Sustainable homes</i></b></p> <p>It may be appropriate for the plan to consider the repurposing of existing built fabric and its embodied carbon rather than demolition and new build. This aspect could feed into potential site allocation assessment considerations in relation to non-</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>



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		designated heritage assets as well as site allocation impacts on the character of Conservation Areas.	
Historic England	29 <sup>th</sup> October 2021	<p><b><i>Urban Infill</i></b></p> <p>Historic England recommends that, if the extant Policy is updated and ‘rolled forward’ in the new Plan, any justification text makes it clear that the policy should be read in conjunction with other relevant Plan policies e.g. historic environment.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>
Historic England	29 <sup>th</sup> October 2021	<p><b>Part 10 - Design and Character</b></p> <p><b><i>High quality design AND Design Codes</i></b></p> <p>The National Model Design Code sets out clear design parameters to help local authorities and communities decide what good quality design looks like in their area and Historic England recommends that the new Plan encompasses the characteristics set out in the Code.</p> <p>We would also welcome the inclusion of local design guide production and/or codes within the emerging Plan to ensure local distinctiveness can be sustained and enhanced.</p> <p><b><i>Landscape Character</i></b></p> <p>Historic England would welcome the rolling forward of the existing policy approach set out in Local Plan Policy 44. We would also recommend reviewing whether Historic Landscape Characterisation information can assist in assessment work</p>	<p>Noted.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the Plan with regards to the inclusion of local design guide production and/or codes within the emerging Plan, as well as the use of reviewing whether Historic Landscape Characterisation information can assist in assessment work have been noted and will be considered accordingly.</p>

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		<p>and/or concept/master planning any larger site allocations for new development that may come forward as part of the Plan process:  <a href="https://historicengland.org.uk/research/methods/characterisation/historic-landscape-characterisation/">https://historicengland.org.uk/research/methods/characterisation/historic-landscape-characterisation/</a></p> <p><b>Shop fronts (including shutters)</b></p> <p>Historic England would welcome the rolling forward of an updated, existing policy approach set out in Local Plan 32 - Shop Fronts.</p>	
Historic England	29 <sup>th</sup> October 2021	<p><b>Part 14 - Heritage (Local Challenges)</b></p> <p>Historic England welcomes the Council's proposed approaches to Conservation Areas and Listed Buildings and locally listed buildings and would be happy to discuss matters further with you in due course ahead of the next iteration of the Plan if that would be helpful.</p>	<p>Noted.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Historic England	29 <sup>th</sup> October 2021	<p><b>SA Scoping Report</b></p> <p><b>Table 7: SA Framework and Assumptions - Historic and Heritage Assets</b></p> <p>We have concern in relation to the proposed 800m distance resulting in a negligible outcome since setting can be affected at longer distances. We recommend that the work done on individual site assessment work in relation to the historic environment feeds into the SA considerations. Any uncertain</p>	<p>Noted.</p> <p>The Local Plan's Sustainability Appraisal must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The specific recommendations to improve and strengthen the relevant aspects of the Sustainability Appraisal element of the Local Plan preparation</p>

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		outcomes would indicate that further assessment work is required at the Plan stage. Historic England will be happy to discuss the SA work in due course ahead of the next iteration of the Plan if that would be helpful.	have been noted and will be considered accordingly.
Leicester City Council	29 <sup>th</sup> October 2021	The City council notes that the Issues and Options consultation is an early stage of the plan preparation for Oadby & Wigston Borough Council. At this stage a lot of evidence still needs to be undertaken and/ or updated to inform the direction of policy in the new Local Plan for most topic areas e.g. housing, retail, employment, green wedges etc. However, the City Council has the following comments to make in relation to your consultation document.	Noted.  The Council would like to thank the Leicester City Council for taking time to read through the consultation document and for responding.
Leicester City Council	29 <sup>th</sup> October 2021	<b>Part 01. Introduction and Next Steps - Contents Page</b>  The provision of Health facilities is not addressed in the Infrastructure (Strategic Challenge) section. Instead it is addressed in the Health and Wellbeing (local challenge) document. There are cross boundary issues in relation to health facilities due to proximity of services to the administrative boundary within Oadby & Wigston and the City. In future it would be more appropriate to address health facilities as a “strategic challenge”.	Noted.  As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.  The specific recommendation to improve and strengthen this section of the Plan and to address health facilities as a “strategic challenge” in the emerging Local Plan has been noted and will be considered accordingly.
Leicester City Council	29 <sup>th</sup> October 2021	<b>Parts 02. Overarching Policy Areas</b>	Noted.

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		We welcome the paragraph on duty to cooperate which outlines your commitment to work jointly towards the Statement of Common Ground dealing with the City's unmet need.	
Leicester City Council	29 <sup>th</sup> October 2021	<p><b>Part 03. Strategic Housing</b></p> <p>Welcome the mention of joint working to meet the City's unmet need.</p> <p>Para 4.4 would be better amended to recognise that the Statement of Common Ground is ongoing work. Therefore, recommend the following text be included at the end of the paragraph "... through the ongoing work on the Statement of Common Ground".</p>	<p>Noted.</p> <p>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.</p> <p>The specific wording recommendation has been noted and will be considered accordingly.</p>
Leicester City Council	29 <sup>th</sup> October 2021	<p><b>Part 06. Green Infrastructure</b></p> <p>Good to see the section on shared Green Wedges across boundaries including us. However, it would be good to see a mention of working jointly with us (and others) should they consider proposing any site allocations on the shared green wedges through the local plan process.</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>Local planning authorities in the Housing Market</p>

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			<p>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.</p> <p>The specific recommendations relating to Green Wedges and the shared relationship that they serve between the two administrative areas has been noted and will be considered accordingly moving forwards.</p>
Leicester City Council	29 <sup>th</sup> October 2021	<p><b>Part 11. Economy, Retail and Leisure.</b></p> <p>It is evident from this section that updated evidence is needed to inform the direction of policy. New evidence would take into consideration recent changes in the retailing &amp; leisure sector, including the impact of the pandemic etc, which will influence the amount of new floorspace that is needed in the Borough. A new study would also review the primary and secondary shopping frontages and local impact thresholds to establish if these policy tools are still appropriate and at what levels they should be set at.</p> <p>The introduction of class E will also have a big influence on any new Local Plan policy as it will greatly influence the type uses that are acceptable within shopping centres and those which change of uses no longer need planning permission. It is likely that the new local plan will need to allow for greater flexibility of uses within shopping centre policies.</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations relating to the retailing &amp; leisure sector and the changes to the Use Classes Order (and how this is changing the role of retail centres) has been noted and will be considered accordingly moving forwards.</p>

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Leicester City Council	29 <sup>th</sup> October 2021	<p><b>Part 08. Infrastructure - Strategic Challenges</b></p> <p><b>Highways Capacity</b></p> <p><b>Potential options:</b></p> <ul style="list-style-type: none"> <li>• Seek to deliver larger scale transport and highway interventions, for example, those set out within the Leicester and Leicestershire Strategic Growth Plan, in an attempt to reduce congestion and traffic within the Borough area.</li> <li>• Continue to implement smaller scale isolated remedial works that do not take account of the overall strategic highway network, and which could ‘shift’ congestion rather than mitigating it.</li> </ul> <p><b>Questions:</b></p> <ul style="list-style-type: none"> <li>• <b><i>Should the Council and the County Council (as the local highways authority) be seeking delivery of larger scale transport and highway interventions in an attempt to reduce the current levels of congestion within the Borough area?</i></b></li> </ul> <p>The City Council approved the Strategic Growth Plan (SGP) (along with the other nine partners in Leicestershire) that provides a long-term vision for planned growth in Leicester and Leicestershire. The SGP includes a proposed strategic highway intervention to support the large-scale growth of</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>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.</p> <p>The specific recommendations relating to cross-boundary transport and infrastructure initiatives, as well as the need to consider and prioritise more sustainable transport solutions to align the net zero agenda have been noted and will be considered accordingly moving forwards.</p>

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		<p>additional housing and employment and it is supported to unlock proposed areas of development.</p> <p>However, specifically for movements accessing the city, the City Council supports a sustainable travel led approach for people accessing jobs, facilities, and leisure opportunities within the city, rather than seeking highway and transport interventions to the benefit of the motorist. This is set out in our recently consulted draft Leicester Transport Plan (2021-36).</p> <p><b>• <i>Should the Council and the County Council (as the local highways authority) be accepting that congestion will only ever increase over the Plan period as and when new development comes forward?</i></b></p> <p>The Borough Council and County Council need to be mindful of the government’s agenda to deliver a step change towards more sustainable forms of transport, for example reducing transport’s emissions to reach net zero. The Department for Transport’s “Transport Decarbonisation Plan” (July 2021) supports making public transport, cycling, and walking the natural first choice for all who can make it and seeks to reduce urban road traffic overall. By 2030, the government aims to have half of all journeys in towns and cities cycled or walked.</p> <p>It is strongly advised that the Borough Council aligns its policies and narrative to the national agenda. Developments need to be planned to minimise car use and promote sustainable transport choices and the planning system has an</p>	<p>The Council welcomes partnership working to explore cross-boundary infrastructure solutions, with Leicester City Council and Leicestershire County Council (as the Highways Authority for the County’s administrative area).</p>

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		<p>important role to play in ensuring this is delivered to tackle congestion. Therefore, the Borough Council and County Council should not be accepting that congestion will only ever increase over the Plan period as and when new development comes forward.</p> <p><b>• <i>What transport and highway interventions do you think the Council and the County Council (as the local highways authority) should consider to improve congestion within the Borough area?</i></b></p> <p>Interventions should focus on a sustainable travel led approach. We believe that this generally provides a long-term solution in supporting a sustainable transport strategy as highway interventions for the private car is often a short-term solution to managing congestion.</p> <p>The Borough Council and County Council should focus on making walking, cycling, and using public transport more attractive to use for everyone. For example, specific interventions could include connecting cross boundary cycle and walking routes, improving public transport infrastructure that all provide a good quality alternative to the car. The City Council has secured over £70m of investment from the government’s Transforming Cities Fund (TCF) to deliver greater sustainable transport opportunities by 2023/4. It is envisaged that future schemes post 2023/4 under a similar programme to TCF, will be provided to the south and east of Leicester, extending into the Borough, where appropriate. This will provide an opportunity for partnership working. This will</p>	



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		also maximise opportunities to travel into Leicester sustainably and therefore reduce the need to travel by car.	
Leicester City Council	29 <sup>th</sup> October 2021	<p><b>Highways Infrastructure Need</b></p> <p><b>Potential options:</b></p> <ul style="list-style-type: none"> <li>• Set out in Local Plan Policy that all residential developments that meet the ‘large site’ threshold of 10 or more dwellings, must provide contributions to support the delivery of local / strategic highway infrastructure solutions.</li> <li>• Set out in Local Plan Policy that all residential developments regardless of size will be required to provide contributions to support the delivery of local / strategic highway infrastructure solutions.</li> <li>• No policy wording encouraging or requiring the provision of contributions to support the delivery of local / strategic highway infrastructure solutions.</li> </ul> <p><b>Questions:</b></p> <ul style="list-style-type: none"> <li>• <b><i>Should the Council require all development to provide contributions to support the delivery of local / strategic highway infrastructure solutions?</i></b></li> </ul> <p>Where there is a robust evidence of impact on the highway network, financial contributions should be sought where</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations relating to cross-boundary transport and infrastructure initiatives, as well as the need to consider and prioritise more sustainable transport solutions have been noted and will be considered accordingly moving forwards.</p> <p>The Council welcomes partnership working to explore cross-boundary infrastructure solutions, with Leicester City Council and Leicestershire County Council (as the Highways Authority for the County’s</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p>possible subject to viability, for any adverse impacts on the highway network.</p> <ul style="list-style-type: none"> <li>• <b><i>Should the Council encourage applicants to provide contributions to support the delivery of local / strategic highway infrastructure solutions?</i></b></li> </ul> <p>Where there is a robust evidence of impact on the highway network, financial contributions may be sought for any adverse impacts on the highway network</p> <ul style="list-style-type: none"> <li>• <b><i>What transport and infrastructure solutions do you consider are required so that growth can come forward in the future?</i></b></li> </ul> <p>A sustainable travel led approach, which includes walking, cycling and public transport measures will be required, ensuring that they provide an excellent alternative to using the car. As mentioned previously, the Council is delivering a programme of sustainable transport projects (TCF programme), and for the Borough, this types of transport and infrastructure solutions could include bus priority measures, dedicated commuter cycle routes, provision of safe and attractive walking and cycling routes connecting from the Borough into the city. A specific example of how TCF investment is helping to address some of the cross-boundary challenges in the north west of Leicester is a new bus link between Gorse Hill in Charnwood and Bennion Road in Leicester. This will significantly improve bus journey times and service reliability between Anstey and Beaumont Leys centre</p>	<p>administrative area).</p>

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		<p>and a new park and ride site to the north west of the city. The new link will also benefit cyclists and pedestrians.</p> <p><b>• Which option from the above set of potential options would be the most appropriate for the Borough area?</b></p> <p>Developments need to be assessed on a case by case basis to determine if contributions are required, subject to robust evidence for any adverse impacts on the highway network and the viability of the site.</p>	
Leicester City Council	29 <sup>th</sup> October 2021	<p><b>Sustainable Transport</b></p> <p><b>Potential options:</b></p> <ul style="list-style-type: none"> <li>• Set out in Local Plan Policy that all residential and / or large-scale non-residential developments must provide on-site infrastructure or an off-site contribution to support the delivery of local / strategic sustainable transport solutions.</li> <li>• Continue with existing policy approach, as per the Council’s adopted Local Plan Policy 26: Sustainable Transport and Initiatives, ensuring that it is up to date with national planning policy and guidance.</li> <li>• No policy wording encouraging or requiring the provision of on-site infrastructure or an off-site contribution to support the delivery of local / strategic sustainable transport solutions.</li> </ul> <p><b>Questions:</b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>Local planning authorities in the Housing Market Area (HMA) have mechanisms in place that enable</p>

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		<p>• <b><i>Should the Council continue with existing policy approach (or similar) in the current Local Plan?</i></b></p> <p>The Borough’s adopted Local Plan Policy 26: Sustainable Transport and Initiatives is still supported. It is considered that off-site infrastructure is still critical in encouraging sustainable modes of transport on the highway network. This includes connections into Leicester.</p> <p>Additional on-site infrastructure provisions to be considered, are off street electric vehicle charging infrastructure. The City Council’s draft Leicester Transport Plan supports the uptake of electric vehicles and whilst the electric vehicle charging market is still maturing, consideration should be given this relatively new infrastructure.</p> <p>• <b><i>Should the Council develop a Local Policy requiring that all residential and / or large-scale non-residential developments must provide on-site infrastructure or an off-site contribution to support the delivery of local / strategic sustainable transport solutions?</i></b></p> <p>There may be some developments that require both on-site infrastructure and an off-site contribution. This could be assessed on a case by case basis due to the size and / or impact of the development on the transport and highway network.</p>	<p>joint working and addressing such matters under the Duty to Co-operate and regular reviews of a Statement of Common Ground.</p> <p>The Council welcomes partnership working to explore cross-boundary infrastructure solutions, with Leicester City Council and Leicestershire County Council (as the Highways Authority for the County’s administrative area).</p> <p>The specific recommendations relating to cross-boundary transport and infrastructure initiatives, as well as the need to consider and prioritise more sustainable transport solutions to align the net zero agenda have been noted and will be considered accordingly moving forwards.</p> <p>Support for a specific Policy focusing on Sustainable Transport Solutions is also noted and welcomed, together with the seeking of on and off-site solutions, where robust evidence dictates a need for such solutions.</p> <p>The Council also notes the support to continue safeguarding of the Potential Transport Route (former EDDR) until further evaluation which includes the full EDDR concept / route, has been considered and assessed.</p>

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		<p><b>• <i>Should the Council develop a Local Policy that actively promotes and encourages sustainable transport and discourages the use of the private car?</i></b></p> <p>The City Council is strongly supportive of a Local Policy promoting and encouraging sustainable transport. As mentioned previously, this approach would be aligned to the Government’s recent publications of the Decarbonisation Transport Plan (July 2021) and Gear Change (July 2020).</p> <p>The Policy would further support healthier lifestyles, improve the local environment, and create a more attractive environment for walking and cycling.</p> <p>The Policy would also complement the City Council’s sustainable transport strategy, the ‘Connecting Leicester’ initiative, creating and enhancing sustainable transport connections which has been supported through a successful bid to the government’s Transforming Cities Fund (TCF). The Policy will help to maximise opportunities for sustainable travel.</p> <p><b>• <i>Should the Council promote improved technology and traffic management solutions to address congestion, delays, and air quality issues in the Borough?</i></b></p> <p>A vast array of transport technological innovations is now coming to the fore. One of the most significant applications is the smart management of highway network to increase the efficiency of road space and to prioritise sustainable modes of</p>	

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		<p>transport. The Council strongly supports the promotion of technological advances in transport to help manage traffic flows safely and give priority for buses and cyclists where needed.</p> <p><b>• <i>Should the Council allow for development and accept that junctions and links will continue to operate above capacity?</i></b></p> <p>The Borough Council has similar challenges to Leicester on its highway network such as congestion hotspot areas alongside new growth placing an increasing demand on its transport system.</p> <p>The City's draft Leicester Transport Plan (2021-36) recognises this and views that congestion starts to act as a 'drag' on the local economy. To effectively manage demand for car use, the Council needs to improve sustainable transport choices, remove barriers, and provide incentives to choose public and active transport. Therefore, the approach to accept that junction and links will continue to operate above capacity is not supported.</p> <p><b>• <i>Which option from the above set of potential options would be the most appropriate for the Borough area?</i></b></p> <p>The Council is supportive of the adopted Local Plan Policy 26: Sustainable Transport and Initiatives, with further consideration should be given to the types of sustainable transport interventions in response to recent Government</p>	

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		<p>publications (Decarbonising Transport Plan, July 2021 and Gear Change, July 2020). Also, where there is evidence of impact on the highway and transport network, off site and on-site contributions / infrastructure should be required (subject to viability) to support the delivery of local / strategic transport solutions.</p> <p><b>• <i>Should the Council continue to safeguard the Potential Transport Route (former EDDR) in Oadby? If so, please provide justification / evidence of its need.</i></b></p> <p>The Council supports the continued safeguarding of the Potential Transport Route (former EDDR). The City Council's section of the Eastern District Distributor Road is a long standing Highway Improvement Scheme and we will continue to retain the scheme until such a time that a decision is made that it is no longer required as a measure to address the pressures on traffic and travel movements around the Eastern side of Leicester.</p> <p>The Edwards and Edwards (2017) report, Evidence Study Phase 2: Existing Highway Network Assessment Opportunities and Constraints undertook an assessment on the potential impacts of providing a link between the A6 and Gartree Road. The report highlighted that it was likely to provide benefit to orbital vehicular movements. Therefore, until further evaluation which includes the full EDDR concept / route has been assessed, it would not be appropriate to remove the improvement line.</p>	

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Leicester City Council	29 <sup>th</sup> October 2021	<p><b>“Sites Collation and Initial Assessment” document - Spring 2021</b></p> <p>This document sets out all the sites that were submitted as part of the Borough Council’s call for sites in 25th September 2020 to 20 November 2020. An initial assessment of the sites has been undertaken but does not assess the extent as to whether a site is deemed appropriate or not.</p> <p>However, the City Council notes inclusion of the following sites:</p> <ul style="list-style-type: none"> <li>▪ OAD003* (Spire Hospital, Gartree Rd)</li> <li>▪ OAD004 (Manor Road)</li> </ul> <p>Both of these sites have the potential to prejudice the delivery of the Eastern District Distributor Road. Given the City council’s comments above that it would not be appropriate to remove the improvement line before further evaluation of the full EDDR concept has taken place, we would have strong reservations about potential development on the above sites if they were to prejudice the EDDR scheme being delivered.</p> <p>Site OAD005 (Land North of Palmerston Way) has also been forward for development. The proposed use(s) aren’t clear, but this site is of potential cross-boundary interest to us in terms of how it would be accessed and also the relationship with neighbouring dwellings in our administrative area. There are also flooding cross boundary flooding issues that would require careful consideration. Therefore, the City Council asks</p>	<p>Noted.</p> <p>All sites received to date via the Call for Sites process in 2020 and 2021 will be taken into account accordingly.</p> <p>The Council are currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing, including that related to the consideration and assessment of specific sites put forward for new growth opportunities.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>



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		that you keep us informed of any progress on the above sites and we are of course happy to be involved in discussions.	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>1. Overarching/general comments not related to any of the specific sections/questions set out below</b></p> <p>The comments contained in this response should be read in conjunction with the County Council’s response to the Borough Council’s ‘Call for Sites: Site Collation and Initial Assessment’ in July 2021.</p> <p>The spatial relationship of the borough with the City, Harborough District and Blaby District is unique in Leicestershire, a geographically small borough with strong functional relationships with the adjoining City and parts of Harborough District and Blaby District it occupies an enviable accessible location with significant green spaces, good mix of housing and employment, part of Leicester University, good schools and includes some countryside. It’s uniqueness in terms of character and identity and as a desirable location needs to be retained and enhanced through careful future planned growth.</p> <p>The proposed new end date of the Plan to 2041 enables the proposals of the Strategic Growth Plan (SGP) to be tested and taken on board in the new Local Plan. This entails a shift in emphasis to provide an increased scale of housing and employment in the south and east of the County, including delivering growth in the Priority Growth Corridor to the south and east of the City. As such, it is anticipated that the</p>	<p>Noted.</p> <p>The Council would like to thank the Leicestershire County Council for taking time to read through the consultation document and for responding.</p> <p>The Council will ensure that this response is read in conjunction with the County Council’s response to the Council’s ‘Call for Sites: Site Collation and Initial Assessment’ in July 2021. However, the responses that were received at that time have not been made publicly available because as yet, no evidence or site selection assessment has taken place and therefore, it would not be appropriate to publish that information.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance, including the proposals of the Strategic Growth Plan (SGP), including delivering growth in the Priority Growth Corridor to the south and east of the City.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take</p>

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		<p>emerging new Local Plan will refer to how the growth proposals in the Priority Growth Corridor are linked to future growth in Oadby and Wigston Borough, and it envisaged that the SGP will provide the mechanism for distributing future growth arising from this borough which it cannot accommodate in the future due to being geographically constrained.</p> <p>Other important linkages for the Borough include the City’s Transforming Cities programme and funding, improvements to cycleways and walkways with the City and neighbouring Blaby District and Harborough District and the Bus Service Improvement Plan and associated funding. With links needing to be made with the new Economic Growth Strategy for L&amp;L, the emerging Local Transport Plan and workplace charging levy for the City and the emerging Local Transport Plan for the County.</p> <p>The Local Highway Authority is supportive of the development plan process; whilst providing for the future growth of Leicester and Leicestershire will be challenging in many regards (including in respect of highways and transport), a Plan-led approach offers the greatest opportunities to address those challenges as compared to seeking to deal with the impacts of ad-hoc, ‘unplanned’ growth. Thus, the Local Highway Authority recognises the importance of continuing to deliver growth in a ‘planned’ manner as opposed to ‘unplanned’, and therefore wishes to see the new Local Plan successfully adopted.</p> <p>The Local Highway Authority was closely involved in the Borough Council’s work to develop the evidence base under-</p>	<p>shape.</p> <p>The specific recommendations relating to cross-boundary transport and infrastructure initiatives, as well as the need to consider and prioritise more sustainable transport solutions to align the net zero agenda have been noted and will be considered accordingly moving forwards.</p> <p>Support for a specific Policy focusing on Sustainable Transport Solutions is also noted and welcomed, together with references to the Strategic Growth Plan (and the Priority Growth Corridor); the Transport Decarbonisation Plan; Neighbourhood Plans and Minerals and Waste Planning.</p> <p>References to Covid-19 and its impacts will also be considered and strengthened. As evidence develops, this will also be a consideration in that context.</p> <p>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.</p> <p>The Council welcomes partnership working to explore cross-boundary infrastructure solutions and will proactively seek every opportunity to expand</p>

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		<p>pinning the content of the current Local Plan. It looks forward to having the opportunity to be likewise closely involved in the development of the new Oadby and Wigston Local Plan (new Plan).</p> <p>Given its geographical location, there are likely to be transport interaction between further growth in the Borough and neighbouring administrative areas and vice-versa (indeed, that was a key reason why the South East Leicester Transport Strategy Area (SELTSA) work was initiated in respect of the current Local Plan). This is particularly the case with Leicester City, where maintaining effective transport connectivity to the range of economic and social services and opportunities that it provides will continue to be important for current and future residents of the Borough. In that regard, there may be opportunities to build on measures being delivered by Leicester City Council as part of its Transforming Cities Fund projects.</p> <p>Also, given that the new Plan is proposed to have an end date of 2041, this brings its timeframe in scope with the shift in emphasis of housing distribution at the Housing Market Area level as set out in the Strategic Growth Plan (SGP), including to deliver growth within a Priority Growth Corridor (PGC) around the south and east of Leicester. So, whilst the early reference to the SGP is welcomed in setting the general context in which the new Plan is being developed, the final version of the new Plan perhaps needs to say more about how growth proposals in the PGC might interact with further growth in the Borough. Transport evidence work being undertaken for</p>	<p>and enhance this dialogue to make this Local Plan an effective and robust Policy document for the Borough.</p>

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		<p>the SPG might also demonstrate implications for the Brough's highways and transport system.</p> <p>It is perhaps surprising that the Plan does not acknowledge the ongoing Covid-19 pandemic and current uncertainties over the long-term implications this will have on society, including on transport provision and travel behaviour (encompassing trends such as increased home working). Will the emerging evidence relating to these potential long-term implications be reviewed and incorporated as necessary as the development of the plan progresses?</p> <p>The new Plan could do more to talk about carbon reduction and link to the <a href="#">Transport Decarbonisation Plan</a> where possible.</p> <p>Neighbourhood Plans play an important and valuable role within the planning system. This should be strengthened and supported by robust Neighbourhood Planning policies within the Local Plan. Although Oadby &amp; Wigston have yet to have any groups take up neighbourhood planning this does not mean that this will always be the case going forward. We would welcome the inclusion and importance of NPs being reflected within the Local Plan. Strong policies within neighbourhood plans could be encouraged through wording within the Local Plan to support wider priorities such as climate change. It would be disappointing if this opportunity were to be missed.</p> <p>Minerals and waste safeguarding should form part of the methodology for site selection allocation.</p>	

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		<a href="https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2019/10/3/SUB8-Oadby-Safeguarding-2015.pdf">https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2019/10/3/SUB8-Oadby-Safeguarding-2015.pdf</a>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Part 01. New Local Plan Issues and Options – Introduction and Next Steps</b></p> <p><b>2. Any general comments?</b></p> <p>It is positive to see reference to sustainable development and climate change being a golden thread running through the new Local Plan.</p> <p>Whilst the early reference to the SGP is welcomed in setting the general context in which the new Plan is being developed, the final version of the new Plan perhaps needs to say more about how growth proposals in the PGC might interact with further growth in the Borough. Transport evidence work being undertaken for the SPG might also demonstrate implications for the Borough’s highways and transport system.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Part 02. New Local Plan Issues and Options – Overarching Policy Areas</b></p> <p><b>Plan Period and Cooperation</b></p> <p><b><i>3. Is the suggested Local Plan time period of ‘date of adoption to the year 2041’ appropriate?</i></b></p>	Noted.

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		<p>Yes, to account for any delays in production of the plan, and aligns with time spans of a number of existing/emerging studies. The rationale as presented by the Council seems robust and allows for contingency to be built into the plan preparation time in respect to mitigating any slippage that might occur.</p> <p>Even with delays in the published local plan timetable the proposed end date of 2041 should provide the minimum 15 year plan period and is therefore supported subject to there being a sound body of evidence to support housing numbers and employment needs. The full period should also facilitate larger developments being built out rather than part allocations being held over into the next plan period.</p> <p>In the context of the Local Highway Authority's overarching and general comments in respect of the SGP, this timeframe appears to be appropriate. It will be important to make sure that any traffic modelling work done as part of the evidence base to underpin the new Plan also reflects this date.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>4. Who should be the key stakeholders that the Council enters into Statements of Common Ground with?</b></p> <p>All the other authorities in Leicester and Leicestershire in respect of housing and employment needs and the delivery of strategic infrastructure required to support growth (SGP), National Highways (formerly Highways England), Homes England, health etc depending on the breadth of issues covered in the Statement of Common Ground.</p>	Noted.

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Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Where should development go?</b></p> <p><b><i>5. Which of the proposed options illustrated should be used in determining the location of new development within the Borough area?</i></b></p> <p>The County Council advocates a balanced sustainable approach; a varied portfolio of future sites, where possible close to existing services and facilities providing for the communities within the Borough, ideally embracing the walkable neighbourhoods (20 minute neighbourhoods) concept and enabling the character and identity of the Borough to be enhanced and flourish.</p> <p>Recognising the geographic realities of the Borough, nevertheless the Local Highway Authority's preference would be for the new Plan to seek to locate as much of the Borough's future growth in sustainable locations, i.e. in areas that have close proximity to existing employment, shops, leisure, etc. Where it is necessary to allocate further greenfield sites, these should be in location capable of being served by cycling and walking infrastructure in accordance with the requirements of <a href="#">LTN1/20*</a> and as appropriate viable, sustainable (in financial terms going forward) passenger transport services that reflect the ambitions of the National Bus Strategy '<a href="#">Bus Back Better</a>'. (Note that the Local Highway Authority is currently preparing a Bus Service Improvement Plan (BSIP) which will set out more detail about how, working in collaboration with local bus operators, it will be seeking to improve bus services across</p>	Noted.

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		<p>Leicestershire. The BSIP will be published by no later than 31 October 2021.) * <i>This is the Government's national guide on cycle infrastructure design, which, inter-alia, sets out that in urban areas cyclists and pedestrians must be physically separated and should not share the same space.</i></p> <p>In line with a circular economy which is the Government's ambition to achieve, concentrating development within existing urban areas would utilise resources already in use and maximise the value recovered from them increasing resource productivity.</p> <p>From a public health perspective, a mixture of locations would provide choice for house-buyers, those accessing affordable homes and tenants to make the best choice for their lifestyle and needs. Whilst developing on too much green space reduces the amount that is accessible for residents and visitors and reduces the opportunity from the benefits to physical and mental wellbeing that this affords, well thought-through development allows the opportunity for increased access close to home for those with transport difficulties or mobility issues.</p> <p>From an education perspective, new development should be focused towards the greenfield areas of the Borough, for example many of which that have been put forward for consideration to the Council and are included in the 'Call for Sites: Site Collation and Initial Assessment'. The County Council has already responded to the call for sites options on where schools can expand. Many schools in the borough are</p>	



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		<p>land locked or at capacity. Sites need to be placed near to the schools which can be enlarged or new schools built.</p> <p>Minerals and waste safeguarding should form part of the methodology for site allocation, whether development is on greenfield land or otherwise. Information is available at <a href="https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2019/10/3/SUB8-Oadby-Safeguarding-2015.pdf">https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2019/10/3/SUB8-Oadby-Safeguarding-2015.pdf</a> in map from and Leicestershire County Council should be consulted on development within safeguarding areas or in close proximity to permitted minerals and waste development sites.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>6. Should all new development incorporate an element of housing, shops, leisure and employment, or should shops and employment remain in designated areas, for example town centres and identified employment areas?</b></p> <p>It appears unlikely given the general scale of greenfield areas probably available in the Borough for further development that they will be capable of supporting a sufficient and viable range of shopping, leisure, etc. provision to have any significant impact on the need to travel externally (i.e. developments will be of too small a scale to be truly self-contained communities/sustainable urban extensions). Thus, in line with its response to the previous question, the Local Highway Authority's preference would be for the new Plan to seek to locate as much of the Borough's future housing needs in areas that have close proximity to existing shops, leisure, etc. and to focus on ensuring that high quality provision for cycling and</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>

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		<p>walking is provided between them to prompt travel other than by car. Where development is relatively more 'remote', the Local Highway Authority will expect the new Plan to provide a policy basis for developers still to contribute towards sustainable transport options including electric charging points alongside new build houses and cycling, walking and for passenger transport as appropriate.</p> <p>Designated areas can cause accessibility issues and impact on things such as air quality, financial wellbeing, physical activity and obesity levels (due to car use/lack of ability to use active modes of travel). People can find it difficult to thrive without using a car.</p> <p>There is growing evidence based for the creation of places in which most of people's daily needs can be met within a short walk or cycle, allowing people to become more active, improve their mental and physical health; reduce traffic (and improve the aforementioned air quality) and benefit economically. This can also benefit local shops and businesses and allow people to see more of their neighbours and communities, strengthening community cohesion and social connectivity. See here for more details: <a href="https://www.tcpa.org.uk/the-20-minute-neighbourhood">https://www.tcpa.org.uk/the-20-minute-neighbourhood</a>.</p> <p>The topography of Oadby and Wigston, with its compact nature, gives a good opportunity to explore a more connected place to live through strategic planning, even if areas are designated through focusing on transport and connectivity if carefully planned.</p>	<p>The specific recommendations relating to measures to locate development as close to existing shops, leisure, etc. and to focus on ensuring that high quality provision for cycling and walking is provided between them to prompt travel other than by car is prioritised so that more sustainable transport solutions to align the net zero agenda have been noted and will be considered accordingly moving forwards.</p>

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Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Part 03. New Local Plan Issues and Options – Strategic Housing</b></p> <p><b>Housing Need</b></p> <p><b><i>7. Is there any robust evidence to suggest that the Council should continue to use the current housing requirement of 148 new homes per year set out within the current Local Plan?</i></b></p> <p>The Housing and Employment Needs Assessment (HENA) which is currently being undertaken across Leicester and Leicestershire will provide a solid basis for informing the distribution of future housing requirements in the Borough. This will be available to inform the next proposed stage of Local Plan work on preferred options which is scheduled to be consulted on in May/June 2022.</p> <p>The Local Highway Authority would want to see any decision about future housing numbers under-pinned by robust evidence; this is not just in respect of calculated need, but in respect of whether the area’s highways and transport system would be capable of accommodating the calculated need (which could be influenced by cumulative impacts of growth in neighbouring areas). In the event that there was evidence to suggest that the Borough was unable to meet its calculated need (i.e. it had an unmet need), the Local Highway Authority would expect the Borough to work with Housing Market Area (HMA) colleagues to assess how best that unmet need should</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will also inform policies related to housing.</p> <p>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.</p>

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		<p>be met across the wider HMA, mindful of the direction of travel set out for the future spatial distribution of new housing set out in the Strategic Growth Plan.</p> <p><b>Comments from the County Council as a landowner</b></p> <p>The Council should use the Standard Method figure (plus a buffer of 10% as a minimum, to provide flexibility) plus any additional needs identified in the HENA including any unmet need from Leicester City identified within the SoCG.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>8. Should the Council use the housing need figure of 180 new homes per year calculated by the Standard Method?</b></p> <p>As per the response to question 7, the Local Highway Authority would want to see any decision about future housing numbers under-pinned by robust evidence; this is not just in respect of calculated need, but in respect of whether the area's highways and transport system would be capable of accommodating the calculated need (which could be influenced by cumulative impacts of growth in neighbouring areas). In the event that there was evidence to suggest that the Borough was unable to meet its calculated need (i.e. it had an unmet need), the Local Highway Authority would expect the Borough to work with Housing Market Area (HMA) colleagues to assess how best that unmet need should be met across the wider HMA, mindful of the direction of travel set out for the future spatial distribution of new housing set out in the Strategic Growth Plan.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will also inform policies related to housing.</p> <p>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.</p>

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		<p><b>Comments from the County Council as a landowner</b></p> <p>The Council should use the Standard Method figure (plus a buffer of 10% as a minimum, to provide flexibility) plus any additional needs identified in the HENA including any unmet need from Leicester City identified within the SoCG.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>9. What should the Council do if the HENA outcomes suggests that there should be a diversion from the Standard Method?</b></p> <p>There should be consideration of the HENA evidence and a work through of an option/s which sets out the variation. This can then be considered by partners, other stakeholders, businesses and communities through the next stage of consultation.</p> <p>As per the response to question 7, the Local Highway Local Highway Authority would want to see any decision about future housing numbers under-pinned by robust evidence; this is not just in respect of calculated need, but in respect of whether the area's highways and transport system would be capable of accommodating the calculated need (which could be influenced by cumulative impacts of growth in neighbouring areas). In the event that there was evidence to suggest that the Borough was unable to meet its calculated need (i.e. it had an unmet need), the Local Highway Authority would expect the Borough to work with Housing Market Area (HMA) colleagues to assess how best that unmet need should be met across the wider HMA, mindful of the direction of travel set out for the</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>

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		<p>future spatial distribution of new housing set out in the Strategic Growth Plan.</p> <p><b>Comments from the County Council as a landowner</b></p> <p>The Council should use the Standard Method figure (plus a buffer of 10% as a minimum, to provide flexibility) plus any additional needs identified in the HENA including any unmet need from Leicester City identified within the SoCG.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>10. What do you consider is the evidenced housing need for the Borough area?</b></p> <p>The latest Standard Method should be used as starting point with any deviation from this strongly evidenced. The HENA when completed could provide the evidence to depart from it.</p> <p>As per the response to question 7, the Local Highway Authority would want to see any decision about future housing numbers under-pinned by robust evidence; this is not just in respect of calculated need, but in respect of whether the area's highways and transport system would be capable of accommodating the calculated need (which could be influenced by cumulative impacts of growth in neighbouring areas). In the event that there was evidence to suggest that the Borough was unable to meet its calculated need (i.e. it had an unmet need), the Local Highway Authority would expect the Borough to work with Housing Market Area (HMA) colleagues to assess how best that unmet need should be met across the wider HMA, mindful of the direction of travel set out for the</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will also inform policies related to housing.</p> <p>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.</p>

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		<p>future spatial distribution of new housing set out in the Strategic Growth Plan.</p> <p><b>Comments from the County Council as a landowner</b></p> <p>The Council should use the Standard Method figure (plus a buffer of 10% as a minimum, to provide flexibility) plus any additional needs identified in the HENA including any unmet need from Leicester City identified within the SoCG.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>11. <i>Should the Borough area be taking any of Leicester City's declared unmet housing need?</i></b></p> <p>The findings of the HENA plus further up to date evidence work currently in preparation will inform the response to this question. Given the geographical constraints and urban nature of the Borough there is likely to be limited opportunity in addition to accelerating the delivery of proposals already planned for in the adopted Local Plan. The implications of doing so need to be understood so unintended consequences do not arise.</p> <p>The Local Highway Authority would wish to see options for meeting Leicester City's unmet housing need assessed as to their practical delivery, including in respect of highways and transport. This is not just to establish potential capacity issues and constraints, but to help to provide a robust, coordinated evidence base against which to identify potential solutions to addressing such constraints; ensure that there is a common understanding across the HMA as to what those solutions</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by</p>

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		<p>might be so as to inform, inter-alia and as appropriate, future Local Plan development; and to provide a basis for seeking to secure the delivery of those solutions, be that through national programmes; regional programmes; or locally funded, e.g. by developer contributions.</p> <p><b>Comments from the County Council as a landowner</b></p> <p>The Council should use the Standard Method figure (plus a buffer of 10% as a minimum, to provide flexibility) plus any additional needs identified in the HENA including any unmet need from Leicester City identified within the SoCG.</p>	<p>doing so, these discussions can begin to take shape.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Housing Density</b></p> <p><b><i>12. Should the Council 'roll forward' the current Local Plan policy relating to housing density ensuring that it is up-to-date with national policy and guidance?</i></b></p> <p>Given the geographical realities of the Borough, continuing to seek to maximise density would seem to be appropriate; this can also have benefits in terms of creating a 'critical mass' of residents that is more likely to support viable and sustainable (in financial terms going forward) improvements to passenger transport services that encourage travel other than by private car.</p> <p>Conversely, the significant step change in cycling and walking provision required under LTN1/20 (most notably a general</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>The specific recommendation relating to seeking to deliver a density that ensures sites are attractive to the market (currently 35 - 38 with higher densities in urban areas / district centres) to provide an</p>



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		<p>presumption that separate facilities should be provided for cyclists and for pedestrians in urban areas) appears likely will have some impact on site density (i.e. cycling and walking infrastructure will likely take up more space on a site than hitherto). Additionally, if home working is to form a greater part of peoples' lives in the future, there could be pressure for larger properties that have a dedicated 'office' and greater garden space, which will also impact on density levels.</p> <p>The literature on the impact of housing density on health outcomes is inconclusive. There is a large amount of heterogeneity between studies which makes it difficult to compare studies or investigate pooled effects. Results from studies are often contradictory – what works in one place doesn't necessarily work in another. This suggests that the impacts of housing density are context specific and the design of higher density housing needs to be fit for purpose. Research is somewhat conflicting in the area of housing density and health with different areas and population groups experiencing different outcomes. What is conclusive is that the quality of housing, particularly in areas of high density, is of utmost importance when looking to improve health outcomes. Dense housing can increase feelings of safety and connectivity to be physically active, but design and quality needs to consider health harms associated with noise from proximity to others, lack of community space and proximity to infrastructure associated with air pollution, for example.</p> <p><b>Comments from the County Council as a landowner</b></p>	<p>economic return to both developer and landowner is noted and will be considered accordingly.</p>

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		<p>There should be a general aspiration to set the density at a figure that ensures sites are attractive to the market (currently 35 - 38 with higher densities in urban areas / district centres) provide an economic return to both developer and landowner and therefore deliverable. That said each site needs to be assessed on the basis of known constraints and other overarching policies in setting a target density.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>13. <i>Should the Council be seeking to increase the minimum density targets in the new Local Plan?</i></b></p> <p>As per the response to question 12, given the geographical realities of the Borough, continuing to seek to maximise density would seem to be appropriate; this can also have benefits in terms of creating a ‘critical mass’ of residents that is more likely to support viable and sustainable (in financial terms going forward) improvements to passenger transport services that encourage travel other than by private car. Conversely, the significant step change in cycling and walking provision required under LTN1/20 (most notably a general presumption that separate facilities should be provided for cyclists and for pedestrians in urban areas) appears likely will have some impact on site density (i.e. cycling and walking infrastructure will likely take up more space on a site than hitherto). Additionally, if home working is to form a greater part of peoples’ lives in the future, there could be pressure for larger properties that have a dedicated ‘office’ and greater garden space, which will also impact on density levels.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council’s Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>The specific recommendation relating to seeking to deliver a density that ensures sites are attractive to the market (currently 35 - 38 with higher densities in urban areas / district centres) to provide an economic return to both developer and landowner is noted and will be considered accordingly.</p> <p>In addition, references to the need to consider home working habits, access to green space, and, design</p>

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		<p>If homes are built more densely, thought needs to be taken around access to green space, light and noise impacts and privacy, which can have negative impacts on mental health. Positives are design focus around creating a sense of belonging, inclusion and safety and also creation of 'compact' walkable neighbourhoods.</p> <p>Comments from the County Council as a landowner</p> <p>As per response to question 12.</p>	<p>considerations, are all noted.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>14. <i>Should the Council be seeking to decrease the minimum density targets in the new Local Plan?</i></b></p> <p>As per the response to question 12, given the geographical realities of the Borough, continuing to seek to maximise density would seem to be appropriate; this can also have benefits in terms of creating a 'critical mass' of residents that is more likely to support viable and sustainable (in financial terms going forward) improvements to passenger transport services that encourage travel other than by private car. Conversely, the significant step change in cycling and walking provision required under LTN1/20 (most notably a general presumption that separate facilities should be provided for cyclists and for pedestrians in urban areas) appears likely will have some impact on site density (i.e. cycling and walking infrastructure will likely take up more space on a site than hitherto). Additionally, if home working is to form a greater part of peoples' lives in the future, there could be pressure for larger</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>The specific recommendation relating to seeking to deliver a density that ensures sites are attractive to the market (currently 35 - 38 with higher densities in urban areas / district centres) to provide an economic return to both developer and landowner is noted and will be considered accordingly.</p>

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		<p>properties that have a dedicated 'office' and greater garden space, which will also impact on density levels.</p> <p><b>Comments from the County Council as a landowner</b></p> <p>As per response to question 12.</p>	<p>In addition, references to the need to consider home working habits, access to green space, and, design considerations, are all noted.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>15. Should the Council be applying a single density target across the Borough area? If so, what is the evidence to suggest this is the case?</b></p> <p>As per the response to question 12, given the geographical realities of the Borough, continuing to seek to maximise density would seem to be appropriate; this can also have benefits in terms of creating a 'critical mass' of residents that is more likely to support viable and sustainable (in financial terms going forward) improvements to passenger transport services that encourage travel other than by private car. Conversely, the significant step change in cycling and walking provision required under LTN1/20 (most notably a general presumption that separate facilities should be provided for cyclists and for pedestrians in urban areas) appears likely will have some impact on site density (i.e. cycling and walking infrastructure will likely take up more space on a site than hitherto). Additionally, if home working is to form a greater part of peoples' lives in the future, there could be pressure for larger properties that have a dedicated 'office' and greater garden space, which will also impact on density levels.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>The specific recommendation relating to seeking to deliver a density that ensures sites are attractive to the market (currently 35 - 38 with higher densities in urban areas / district centres) to provide an economic return to both developer and landowner is noted and will be considered accordingly.</p> <p>In addition, references to the need to consider home working habits, access to green space, and, design considerations, are all noted.</p>

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		<p>If density targets vary across the borough this increases the risk of those experiencing higher levels of deprivation and inequality being disproportionately affected by the negative aspects of housing density mentioned above, as lower cost housing is associated with less access to services to keep us healthy. Different types of green space, easily accessible to everyone, no matter what their income, should be a priority in designing high-density residential areas.</p> <p><b>Comments from the County Council as a landowner</b></p> <p>As per response to question 12.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>16. Should the Council be applying maximum density targets?</b></p> <p>Given the geographical realities of the Borough, continuing to seek to maximise density would seem to be appropriate; this can also have benefits in terms of creating a ‘critical mass’ of residents that is more likely to support viable and sustainable (in financial terms going forward) improvements to passenger transport services that encourage travel other than by private car.</p> <p>Conversely, the significant step change in cycling and walking provision required under LTN1/20 (most notably a general presumption that separate facilities should be provided for cyclists and for pedestrians in urban areas) appears likely will have some impact on site density (i.e. cycling and walking infrastructure will likely take up more space on a site than</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council’s Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>The specific recommendation relating to seeking to deliver a density that ensures sites are attractive to the market (currently 35 - 38 with higher densities in urban areas / district centres) to provide an</p>

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		<p>hitherto). Additionally, if home working is to form a greater part of peoples' lives in the future, there could be pressure for larger properties that have a dedicated 'office' and greater garden space, which will also impact on density levels.</p> <p><b>Comments from the County Council as a landowner</b></p> <p>As per response to question 12.</p>	<p>economic return to both developer and landowner is noted and will be considered accordingly.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Affordable Housing</b></p> <p><b><i>17. Should the Council 'roll forward' the current Local Plan policy relating to affordable housing ensuring that it is up-to-date with national policy and guidance?</i></b></p> <p>Yes the current approach updated to reflect national policy and guidance is appropriate.</p> <p>Viability of affordable housing should include the cost for community facilities such as schools and childcare facilities.</p> <p><b>Comments from the County Council as a landowner</b></p> <p>The plan should be guided by the most up to date assessment of need. If evidence of greater need in specific areas of the Borough is available these figures should be applied to those localities. In all cases the proportion of affordable housing delivered should be subject to the viability of the site not being negatively impacted to the extent that the site becomes undeliverable.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects of these sections have been noted and will be considered accordingly.</p>

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Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>18. <i>Should the Council be applying a single Borough wide percentage target and policy approach?</i></b></p> <p>The percentages, if aiming to improve healthy life expectancy and reduce inequality could be based on population need and access to services, not land value.</p> <p><b>Comments from the County Council as a landowner</b></p> <p>As per the response to question 17.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects of these sections have been noted and will be considered accordingly.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>19. <i>Should the Council be seeking to increase the minimum affordable housing percentage targets in the new Local Plan?</i></b></p> <p>With the financial effects of the pandemic prevailing and the end of furlough approaching, the amount should be calculated based on local need.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering</p>

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		<p><b>Comments from the County Council as a landowner</b></p> <p>As per the response to question 17.</p>	<p>as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects of these sections have been noted and will be considered accordingly.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>20. Should the Council be seeking to decrease the minimum affordable housing percentage targets in the new Local Plan?</b></p> <p>As per the response to question 19, with the financial effects of the pandemic prevailing and the end of furlough approaching, the amount should be calculated based on local need.</p> <p><b>Comments from the County Council as a landowner</b></p> <p>As per the response to question 17.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take</p>



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			<p>shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects of these sections have been noted and will be considered accordingly.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>21. Is the Council correct in amending the qualifying threshold to reflect the current definition of 'major development' as set out in the NPPF?</b></p> <p>The difference seems negligible but yes, it makes sense to align this.</p> <p><b>Comments from the County Council as a landowner</b></p> <p>As per the response to question 17.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>22. What do you consider to be the most appropriate affordable housing target(s) for the Borough area?</b></p> <p>This needs to be based on data and need within local records i.e. Housing Register and affordable home applications. The aim should be that the need be met, or as close as possible?</p> <p><b>Comments from the County Council as a landowner</b></p> <p>As per the response to question 17.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage</p>

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			<p>and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects of these sections have been noted and will be considered accordingly.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Gypsy and Traveller Need</b></p> <p><b><i>23. Should the Council 'roll forward' the current Local Plan policy relating to Gypsy and Traveller and Travelling Show People with minor wording amendments ensuring that it is up-to-date with current national planning policy and guidance?</i></b></p> <p>The criteria-based policy in the current plan is still fit for purpose with the necessary updates to the legal definitions. It should be noted that whilst there is no obvious need for the authority to build pitches for Gypsies and Travellers or Travelling Showman, the Criteria based policy should be applied to any private applications brought forward.</p> <p>The policy should retain the flexibility to support with necessary services for health and wellbeing and wider determinants if needed.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendation to retain flexibility has been noted and will be considered accordingly.</p>

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Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>24. <i>The most up-to-date assessment of gypsy, traveller and travelling showpeople in the Borough area is 0 (zero). Do you have any evidence to suggest that there is a housing need for gypsy, travellers and travelling showpeople within the Borough area?</i></b></p> <p>Whilst there is evidence of Gypsy and Traveller families living in Oadby and Wigston and they are nearly always living in conventional housing, there are a number of unauthorised encampments that pass through the borough during the year. Some of those encampments are due to families visiting relatives and consideration should be given to the provision of Transit sites. These do not necessarily need to be within the Borough but nearby and joint provision of transit sites across Leicestershire would alleviate some of the need and issues caused by unauthorised camping.</p> <p>The continued monitoring of need for Gypsy and Traveller families in the future is also supported.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendation to continue monitoring the need has been noted and will be considered accordingly.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Older Persons Housing</b></p> <p><b>25. <i>Should the Council require applicants to provide older persons housing and / or accommodation, on all development sites regardless of size?</i></b></p> <p>Providing suitable housing for the ageing population is an increasing challenge nationally and locally and a variety of housing solutions are required to enable people to live with</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping</p>

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		<p>dignity as they progress into later life stages. The HENA should provide an up to date insight into this issue for Leicester and Leicestershire.</p> <p>It is not known how many small developments (below 10) are approved in the area and how much difference the 10-dwelling cut off point of 'large' sites would make. If this is a sizeable number, then this cut off/trigger to require older people's housing may seem counter intuitive as you have a high projected increase in this age group and relatively low housing provided in the last 5-10 years?</p> <p>The Adults and Communities department would welcome as a commitment to 'whole life' and 'whole community' development. We would wish to see a stated commitment to the highest standards of dementia friendly town planning and property design particularly as there is transferability to other vulnerable adult populations.</p> <p><b>Comments from the County Council as a landowner</b></p> <p>The provision of housing required to meet the needs of older people should be included within the wider breakdown of housing mix for both market and affordable housing in terms of dwelling type, accessibility and affordability and include provision for those requiring supported living.</p>	<p>to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to incorporate commitments to 'whole life' and 'whole community' development, as well as a stated commitment to the highest standards of dementia friendly town planning and property design have been noted and will be considered accordingly.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<b>26. Should the Council require applicants to provide older persons housing and / or accommodation, on only large development sites that meet the NPPF definition of major</b>	Noted.  The Local Plan must be prepared in accordance

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		<p><b>development?</b></p> <p>As per the response to question 25.</p> <p><b>Comments from the County Council as a landowner</b></p> <p>As per the response to question 25.</p>	<p>with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to incorporate commitments to ‘whole life’ and ‘whole community’ development, as well as a stated commitment to the highest standards of dementia friendly town planning and property design have been noted and will be considered accordingly.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>27. Which option from the above set of potential options would be the most appropriate for the Borough area?</b></p> <p>Options that set requirements rather than encouragement afford much more certainty about how to plan to meet the need of the increasing population of older people. To extend healthy life expectancy and reliance on support services, we need to require homes that can be flexible for people as they age, so from the populations mentioned within the NPPF as</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping</p>

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		<p>approaching retirement and those still active, through to the need for adaptations being able to be made (easily). This increases the opportunity for people to say in their own homes and maintain a level of independence, which is strongly associated with increased wellbeing.</p> <p>The Adults and Communities department would welcome as a commitment to ‘whole life’ and ‘whole community’ development. The document makes no reference, to being dementia friendly. We’d like to see a commitment to the highest standards of dementia friendly town planning and property design particularly as there is transferability to other vulnerable adult populations. The document highlights the growth in the older persons population over the timeline of the plan. At present there are no units of affordable Extra Care Housing units in O&amp;W, this results in an over reliance on Registered Care Homes for those who are unable to be supported/cared for in their own homes. LCC has assessed the available data sources and concluded a need for 1500 units of ECH across the county by 2037, there are approx. 330 units at this time. This would indicate a need of approx. 150 units of ECH in O&amp;W by 2037. Extra Care Housing and Supported Living would benefit from being located within close walking distance of the facilities referred to in Section 7. Potential Community, Retail and/or Health Use.</p> <p><b>Comments from the County Council as a landowner</b></p> <p>As per the response to question 25.</p>	<p>to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to incorporate commitments to ‘whole life’ and ‘whole community’ development, as well as a stated commitment to the highest standards of dementia friendly town planning and property design have been noted and will be considered accordingly.</p> <p>In addition, the specific reference to there currently being no units of affordable Extra Care Housing (and Supported Living) in O&amp;W and therefore highlighting the estimated demand up to 2037 of 150 units by 2037 is also a welcomed comment and will duly be taken into consideration.</p>

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Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>28. <i>Should the Council be considering the housing needs for younger persons as well as the housing needs for older persons?</i></b></p> <p>With the longer-term financial impacts of the pandemic uncertain, it would seem sensible to consider housing need for younger people too, who may need access to more flexible/affordable housing before their situation gets to crisis point. Links to access to employment could also be key here for those trying to access first jobs/increased hours/multiple roles/flexible roles around education/apprenticeships/progression/a return to work after ill health.</p> <p>The Strategic Growth Plan mentions a priority around reducing the loss of skills when graduates leave the county after university ends, could consideration around the needs for housing for younger people contribute towards this priority?</p> <p>The Adults and Communities department would support the inclusion of a specific commitment to units of specialist housing offers for working age adults living with vulnerabilities i.e. Learning Disability, Physical Disability, Sensory Impairment and Mental Health problems alongside younger adults transitioning from LCC Children and Family Services to Adult Services i.e. bungalows including wheelchair accessible developments, small developments of single person flats including wheelchair accessibility which could be aimed at supported living. The Adults and Communities department will</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific support for the inclusion of a commitment to deliver units for specialist housing is noted and will be considered accordingly.</p>

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		<p>work with O&amp;WDC on the volume and location of such developments.</p> <p><b>Comments from the County Council as a landowner</b></p> <p>As per the response to question 25.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Part 04 – New Local Plan Issues &amp; Options – Employment</b></p> <p><b>Employment Need</b></p> <p><b><i>29. Should the Council use the outputs of the HENA to specify the employment need of the Borough area or produce an up-to-date Employment Land and Premises Study?</i></b></p> <p>The findings of the HENA should be considered and a view taken as to whether this provides a sufficient basis on which to plan for the employment needs of the Borough. If not an up to date Employment Land and Premises Study should be considered, possibly in collaboration with neighbouring districts and linked to the City given the geographical connectivity of the Borough.</p> <p>The Local Highway Authority would want to see any decision about future employment land needs under-pinned by the most appropriate source of robust evidence; this is not just in respect of calculated need, but in respect of whether the area’s highways and transport system would be capable of accommodating the calculated land need (which could be</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific references to cross-boundary need and Transport evidence is noted and will be factored in as part of any future decision making accordingly.</p>



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		<p>influenced by cumulative impacts of growth in neighbouring areas).</p> <p>In the event that there was evidence to suggest that the Borough was unable to meet its calculated land need, the Local Highway Authority would expect the Borough to work with Housing Market Area (HMA) colleagues to assess how best that unmet need should be met across the wider HMA, mindful of the direction of travel set out for the future spatial distribution of new housing set out in the Strategic Growth Plan.</p> <p>If a more up to date Employment Land study is carried out, then this should take consideration of the impact of the pandemic and potential number of business deaths which will influence premises required.</p> <p><b>Comments from the County Council as a landowner</b></p> <p>It would seem to be a sensible approach to base employment land needs on the most up to date evidence available.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>30. Is there any other method for calculating the Borough's employment need?</b></p> <p>As per the response to question 29, the Local Highway Authority would want to see any decision about future employment land needs under-pinned by the most appropriate source of robust evidence; this is not just in respect of calculated need, but in respect of whether the area's highways</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and</p>

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		<p>and transport system would be capable of accommodating the calculated land need (which could be influenced by cumulative impacts of growth in neighbouring areas).</p> <p>In the event that there was evidence to suggest that the Borough was unable to meet its calculated land need, the Local Highway Authority would expect the Borough to work with Housing Market Area (HMA) colleagues to assess how best that unmet need should be met across the wider HMA, mindful of the direction of travel set out for the future spatial distribution of new housing set out in the Strategic Growth Plan.</p> <p><b>Comments from the County Council as a landowner</b></p> <p>As per response to question 29.</p>	<p>local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific references to cross-boundary needs and Transport evidence is noted and will be factored in as part of any future decision making accordingly.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>31. <i>Where should additional employment land development be located if a need arises?</i></b></p> <p>In general terms, where the impacts on the area's highways and transport system can best be limited. This is both in respect of seeking to limit the number of individual employee trips made by private car and on limiting the impacts of a site's functioning, e.g. impacts of HGVs. See also Local Highway Authority response to question 30.</p> <p>The plan should focus on upgrading or re-using existing stock within existing sectors and if need is identified for more units then try and re-use brownfield sites first rather than new</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over</p>

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		<p>greenfield sites. With the impact of the pandemic being felt on the High Street with an increasing amount of vacant units there may be an opportunity to re-use vacant floorspace for the Creative sector or small makers which would in turn re-vitalise the town centres.</p> <p>From a Public Health perspective, employment land needs to be accessible, for our working age population to have access to 'good work'. Accessibility considerations should focus around bus routes, opportunity to travel actively, type of business and shift patterns and the opportunity to embed the businesses within the local community.</p> <p><b>Comments from the County Council as a landowner</b></p> <p>As per response to question 29.</p>	<p>the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific reference to the need to locate new employment land in sustainable places is noted and will be factored in accordingly.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Identified Employment Areas (new and existing)</b></p> <p><b><i>32. Which of the above potential options would be the most appropriate approach for managing the supply of employment land within the Borough area?</i></b></p> <p>The 'Core', 'Base' and 'Release' categories for the Identified Employment Areas are supported, as they reflects the importance these employment areas play in providing jobs for local communities, help to retain a good mix of uses, and recognises the changing nature of employment land. Could consideration be given to broadening out employment uses, possibly considering work hubs (ICT trouble shooting,</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over</p>

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		<p>meeting/collaboration space etc) to support agile working and business start-ups and the needs of growing businesses.</p> <p>If there is no evidence to suggest the need for a difference of approach, the Local Highway Authority has no particular reason in principle to seek an alternative approach. Where through the planning system proposals come forward within the IEAs that would materially affect the way a particular site or business operated, the Local Highway Authority will continue to assess those under the prevailing requirements of the NPPF and any other relevant national or local policies, regulations, etc. That could mean, notwithstanding the Local Highway Authority's in general principle position, that for particular site proposals it could still be in a position where it would be advising the Local Planning Authority to refuse the proposals on highways and transport grounds.</p> <p><b>Comments from the County Council as a landowner</b></p> <p>Given the limited access available to the Borough and current constraints within strategic infrastructure it is important to create and maintain as broad a mix of employment opportunities as possible. This should include the availability of modern well equipped start-up and progression units that will enable new businesses to be established and grow adding to the long term economic wellbeing of the area.</p> <p>Where possible existing employment areas should be protected subject to them remaining economically viable.</p>	<p>the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific reference to the updated Use Classes Order and in particular, the introductions of Use Class E and its potential impact has been noted and will be factored in accordingly.</p>

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		The employment (and related) policies will need to address Use Class E and how properties within that general use class are to be treated as part of an overall strategy.	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>33. If you consider that the most appropriate approach is to continue to designate Identified Employment Areas, but amend the policy criteria, what criteria do you consider should be used within a new policy approach?</b></p> <p>As per response to question 32.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific reference to the updated Use Classes Order and in particular, the introductions of Use Class E and its potential impact has been noted and will be factored in accordingly.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>34. If you consider that the most appropriate approach is to discontinue each of the Identified Employment Areas within the Borough and have no specific planning policy approach, how do you consider that the Council best</b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations,</p>

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		<p><b><i>protects employment land for B Class employment businesses to locate, evolve and grow?</i></b></p> <p>As per response to question 32.</p>	<p>policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific reference to the updated Use Classes Order and in particular, the introductions of Use Class E and its potential impact has been noted and will be factored in accordingly.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Part 05 – New Local Plan Issues &amp; Options – Economy</b></p> <p><b>Retail Hierarchy</b></p> <p><b><i>35. Do you consider that the existing list of centres, set out within the current Local Plan, is up-to date and relevant?</i></b></p> <p>The existing list of centres is fine, but with the amount of new house building that has happened since the local plan was produced, coupled with the move to on-line shopping and the closure of many bank/building society branches in local</p>	Noted.

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		centres (which was a main reason for visiting the local town centre) it could be argued that the shopper has become more mobile and research is needed into where/how people shop and access local services which could affect the hierarchy.	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>36. Do you consider that the existing list of centres needs amending to reflect changes that have occurred within the Borough area?</b></p> <p>As per response to question 35.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>37. Do you consider that the existing policy wording set out within Local Plan Policy 23 Retail Hierarchy reflects current national planning policy and guidance?</b></p> <p>No comment.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>38. Do you consider that the apparent differences in the Borough's three main centres of Wigston, Oadby and South Wigston are reflected appropriately, for example should both Oadby and South Wigston, be designated 'District' centres, or should the difference between them be better reflected?</b></p> <p>With the issues listed at question 35 above, it could be argued that Wigston is no longer the main settlement and is equal in status to South Wigston and Oadby. Wigston in terms of development sites with its numerous car parks, the largest of which are in the ownership of the Borough Council does represent the greatest opportunity to grow. This could be not</p>	Noted.

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		just in terms of retail but in particular leisure/ restaurants to develop a night-time economy. The offer is currently dominated by takeaways.	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Retail Need</b></p> <p><b><i>39. Which of the above potential options do you consider is / are the most appropriate for the Borough area?</i></b></p> <p>In general, the Local Highway Authority would wish to see new retail provision made in locations that already offer a significant range of shopping facilities and other services, i.e. in existing centres; this approach should help to minimise trip levels both from existing and future developments. However, subject to the scale of any new housing development sites that might be brought forward in the new Plan, it may be appropriate to include some 'local' retail provision on those sites in order to seek to minimise levels of external trip making.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b><i>40. Should the Council be allocating any further sites for retail provision, bearing in mind that the existing allocations have yet to be built out?</i></b></p> <p>As per response to question 39.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b><i>41. Should the Council be concentrating retail development within just one of the three main centres, rather than spread across all three?</i></b></p>	Noted.



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		<p>In addition to the response to question 39, given the need to adapt to Climate change and to encourage shopping through sustainable means i.e. cycling and walking, people should be encouraged to visit their nearest centre.</p> <p>A focus on 20-minute neighbourhoods and walkable communities may restrict access to products such as affordable healthy food for those less able to travel further. This could exacerbate inequality.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>42. <i>Should the Council be promoting a greater mix of uses within its main centres, rather than having a retail dominant approach, taking account of the changing shopping habits of its local communities?</i></b></p> <p>Subject to available evidence, this may be appropriate where it helps to sustain those centres as a point of focus thereby helping to minimise trip levels within the Borough. However, the Local Highway Authority would not wish to see diversification where a new use might lead to a centre becoming a significant generator/attract of new carborne trips, as in general terms the layout of the road networks in the centres are already constrained and so in such circumstances congestion levels would likely increase with potential health and environmental consequences.</p> <p>Further to the response to question 41, the role of the centres as dominated by retail is being eroded by the move to online sales. This has also affected the role of the centres as service hubs with the closure of banks and building societies with the</p>	Noted.

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		<p>move to online banking. The centres need to adapt and become places where people go for experiences such as dining , drinks, small business collaboration units and events – in both the street and artisan markets, which will need to be accompanied with an upgrade in the public realm and creation new multi-use green spaces. Town centres are often the focus for tourism, but other than the Framework Knitters Museum which is located slightly outside Wigston Town Centre there is little to attract visitors to the centres. The Racecourse at Oadby attracts a huge number of visitors who arrive by car or coach and leave without visiting any of the town centres. None of the 3 centres have a hotel (other than the Stage which is outside of Wigston Town centre) so again there is no footfall generated.</p> <p>A walkable neighbourhood would include good access to food retailers and supermarkets, education and health services, financial services (i.e. post office or ban), employment opportunities, public open space and entertainment (such as leisure, culture and entertainment facilities). Whether, due to the nature of the borough, this could be offered within main centres within a '20 minute neighbourhood' timescale would be down to local knowledge. Some of the above options would allow main centres to be a way to connect with others and socialise; another outcome of the pandemic is a risk to social connectivity, in addition to its impact on retail habits.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<b>Town and District centres and their boundaries</b>	Noted.

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		<p><b>43. Should the Council continue with the current tightly drawn boundaries of its town and district centres?</b></p> <p>Yes. This will hopefully attract quality niche shops/eateries which will sustain the town centres and it unlikely that the amount of retail space that is currently available will be required in the future.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>44. If the answer is no to the answer above, how do you consider that the Council should approach town and district centre boundaries?</b></p> <p>Not applicable.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>45. Do you consider that more high quality new housing should be provided within the Borough areas three main centres of Wigston, Oadby and South Wigston?</b></p> <p>As per the response to question 42, subject to available evidence, this may be appropriate where it helps to sustain the role of those centres, i.e. helps to support the continued existence of the 'high street' thereby helping to minimise trip levels within the Borough. However, the Local Highway Authority would not wish to see a circumstance where a new use might lead to a centre becoming a significant generator/attract of new carborne trips, as in general terms the layout of the road networks in the centres are already constrained and so in such circumstances congestion levels would likely increase with potential health and environmental consequences.</p>	Noted.

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Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Local Centres</b></p> <p><b><i>46. Should the Council continue to define local centres and protect them (and enhance where possible) from inappropriate development?</i></b></p> <p>If there is no evidence to suggest the need for a difference of approach, the Local Highway Authority has no particular reason in principle to seek an alternative one. Where through the planning system proposals come forward within the LCs that would materially affect the way a particular site or business operated, the Local Highway Authority will continue to assess those under the prevailing requirements of the NPPF and any other relevant national or local policies, regulations, etc. That could mean, notwithstanding the Local Highway Authority's in general principle position, that for particular site proposals it could still be in a position where it would be advising the Local Planning Authority to refuse the proposals on highways and transport grounds.</p> <p>The recognition of local centres and their significance to local communities is welcomed. The continuation of defining local centres and protecting them from inappropriate development is a positive as a means to reduce the amount of local traffic. If people can walk or cycle to these local centres this should be encouraged rather than going by car into the main Town Centres.</p>	Noted.

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		As discussed earlier, access to services within the community you live is particularly beneficial to health and wellbeing as an important wider determinant of health. Public Health would welcome consideration around the hot food takeaway provision within these centres and also access to low cost healthier foods.	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>47. Should the Council remove the designation and not have policy considerations relating to local centres?</b></p> <p>As per the response to question 46 and from an economic growth perspective, it is not considered that the designation and policy considerations should be removed.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>48. Are there any currently designated Local centres that should be removed?</b></p> <p>As per response to question 47.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>49. Are there any areas within the Borough area that you consider should be designated as Local centres?</b></p> <p>In addition to the response as per question 47, from an economic growth perspective, as large new housing developments come forward, new centres may need to be designated.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Part 06. New Local Plan Issues and Options – Green Infrastructure</b></p> <p><b>Green Infrastructure</b></p>	<p>Noted.</p> <p>The specific reference to the need to investigate or seek to identify what the local barriers are to</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p><b><i>50. Do you think that the Council should maintain the current Local Plan policy position relating to Green Infrastructure, in the new Local Plan, with minor wording amendments to ensure that it is up-to-date with current national planning policy and guidance?</i></b></p> <p>Yes, given the Borough Council's current approach a net gain in Green Infrastructure through the preservation and enhancement of open spaces and assets.</p> <p>The Local Highway Authority recognises the important role that green infrastructure, including green wedges, can play in terms of climate change and in respect of peoples' health and wellbeing. In broad terms, it has no particular objection to this approach, subject to the new Plan ensuring that:</p> <ul style="list-style-type: none"> <li>- provision for essential transport infrastructure will still be an acceptable land use in a green wedge</li> <li>- for green infrastructure provision in new developments, appropriate management and maintenance regimes are put in place such that no liabilities for future maintenance fall to the Local Highway Authority.</li> </ul> <p>The only other consideration that would be welcomed, which may have been referred to but not explicitly within the current policy is the consideration around making green infrastructure accessible to all. So alongside maximising existing and</p>	<p>physically active adults in the Borough is noted. The Council will seek to work in partnership with key organisations and stakeholders to consider this issue in more detail.</p> <p>The other point about making green infrastructure assets more accessible to all is also noted.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p>developing new Green Infrastructure, it's important to look at how those experiencing health inequality would access these country parks, sports pitches and green wedges. We can provide opportunities for people to increase their physical activity, but what do we do around those that aren't current physically active? The percentage of physically active adults for Oadby and Wigston in 2019/20 is 52.9%. This is the lowest figure of all Leicestershire local authority areas and significantly lower than the England value of 61.4% (Sport England Active Lives Data). What barriers do they have? And how can we mitigate these?</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Green Wedges</b></p> <p><b><i>51. Should the Council 'roll forward' the current Local Plan policy relating to Green Wedges with minor wording amendments to ensure that it is up-to-date with current national planning policy and guidance?</i></b></p> <p>Green Wedges have been an effective policy tool in Leicester and Leicestershire for many years and it is recognised that the compact and urban nature of Oadby and Wigston Borough means that Green Wedges are very important locally. Although the longevity of Green wedges is desired they need to be reviewed regularly to ensure that they still meet the criteria for Green Wedges and to explore whether a release of a selected part/s for future development could be undertaken without fundamentally adversely impacting on the form and function of the Green Wedge.</p>	<p>Noted.</p> <p>The Council will review all existing designations, including Green Wedges, as part of the emerging Local Plan.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		As per the Local Highway Authority response to question 50.	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>52. Should the Council consider whether or not to undertake a Green Wedge Review in order to establish whether or not to retain, create new or amend the boundaries of the existing Green Wedges in order to take account of the new Local Plan proposed site allocations and any other factual updates?</b></p> <p>As per response to question 51.</p>	<p>Noted.</p> <p>The Council will review all existing designations, including Green Wedges, as part of the emerging Local Plan.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Countryside</b></p> <p><b>53. Should the Council 'roll forward' the current policy approach set out in current Local Plan Policy 43 – Countryside, ensuring that it is up to date with current national planning policy and guidance?</b></p> <p>The Local Highway Authority would wish to see any policy on this matter in the new Plan cover that development must not have an adverse highway impact.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>54. Are any of the other options set out above appropriate?</b></p> <p>As per response to question 53.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>55. What forms of development do you consider should be allowed in countryside locations of the Borough?</b></p>	Noted.



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		<p>In general terms, the Local Highway Authority would not wish to see forms of development that would become significant trip generators/attractors in the relatively more remote parts of the Borough, as this would likely result in increased levels of carborne trips.</p> <p>In addition to this general comment, even where the CHA recognises that in principle a certain form of development might be appropriate in countryside locations of the Borough, where through the planning system site specific proposals come forward the Local Highway Authority will continue to assess those under the prevailing requirements of the NPPF and any other relevant national or local policies, regulations, etc. This could mean, notwithstanding the Local Highway Authority's in general principle position, that for particular site proposals it could still be in a position where it would be advising the Local Planning Authority to refuse the proposals on highways and transport grounds.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Sustainable drainage and surface water</b></p> <p><b>56. Should the Council 'roll forward' the current policy approach set out in Local Plan (relevant parts of) Policy 39 – Sustainable Drainage and Surface Water, ensuring that it is up to date with current national planning policy and guidance?</b></p> <p>Yes, with minor modifications to text (see bold italicised text):</p>	<p>Noted.</p> <p>The specific wording revisions will be considered accordingly.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p><i>“The Council will require <b>all proposals, including refurbishments</b> (11 or more residential units or 1,000+ square metres of floor area) to <b>incorporate appropriate Sustainable Drainage Systems</b> in accordance with the latest National Standards for Sustainable Drainage Systems”</i> - While this is ideal, there are a number of instances where SuDS could not reasonably be implemented. Paragraph 167 of NPPF advises that development <i>“incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate”</i>. Consideration should be made to amending the wording of this policy to be more in line with the requirements of NPPF. An example of SuDS being unreasonable would be a town centre building seeking a change of use, where there are no changes proposed to external areas or where there is no space externally for SuDS.</p> <p><i>“...and in agreement with the Lead Local Flood Authority (LLFA) for Leicestershire”</i> - Maybe reword to include compliance with any guidance (SPD or similar) the LLFA may have.</p> <p><i>“Where development proposals are received in areas <b>known to be</b> susceptible to surface water flooding issues, appropriate management and mitigation schemes will be required”</i> - consider removing. An FRA should consider all potential risks of flooding, not just known risks.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<b>Flood Risk</b>	Noted.

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		<p><b>57. Should the Council 'roll forward' the current policy approach set out in Local Plan (relevant parts of) Policy 38 – Climate Change, Flood Risk and Renewable Low Carbon Energy, ensuring that it is up to date with current national planning policy and guidance?</b></p> <p>Yes.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>58. Remove the policy approach and only apply the policy principles and guidance set at a national level through the National Planning Policy Framework and the National Planning Practice Guidance?</b></p> <p>No. The policy goes slightly further than NPPF and as such the Lead Local Flood Authority would welcome the retention of this condition.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>59. Do you consider that the Council should be undertaking a full review of the existing Strategic Flood Risk Assessment or review and only up-date the existing study as and where necessary?</b></p> <p>The current SFRA is dated 2014 and serious consideration should be given to updating this. Since 2014 a number of changes have been made to national policy and guidance surrounding surface water management and flood risk.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<b>Part 07. New Local Plan Issues and Options – Environment and Sustainability</b>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p><b>Habitats and Biodiversity</b></p> <p><b><i>60. Should the Council ‘roll forward’ the current policy approach set out in Local Plan (relevant parts of) Policy 37 – Biodiversity and Geodiversity, ensuring that it is up to date with current national planning policy and guidance?</i></b></p> <p>This should be updated to reflect the need to tackle national and local biodiversity action plan species and habitats most in decline. Currently, semi-improved and natural grassland are not mentioned in policy 37 and perhaps should be because grassland is Leicestershire’s habitat most in decline. This would be better supported by higher standards of maintenance expected by Development Companies and new adopted green space as funded through S106 contributions.</p> <p>P111 of the current Local Plan mentions protection of trees that have TPO designations, LCC would support this but also add that Ancient or Veteran/Mature trees that do not have TPOs should also be protected by good design in development. This would ensure that trees with the ability to sequester most carbon and provide habitat for biodiversity are conserved in the landscape. This supports the Leicestershire Tree Management Strategy and the Leicestershire &amp; Rutland BAP and Policy 40 of the current Oadby Wigston Local Plan.</p> <p>The policy needs significant re-wording to take account of the approaching biodiversity net-gain arrangements – expected to</p>	<p>with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p> <p>With regards to the Policy approach on Geodiversity and Biodiversity, the Council is committed to working with Local Authorities in Leicester, Leicestershire and Rutland to develop up to date evidence and understanding of this complex and ever changing aspect of Plan making.</p> <p>The specific recommendations to the wording of the current Local Plan’s Policy wording, or indeed the suggestion to start with a fresh new Policy, will be taken into consideration accordingly.</p>

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		<p>become a mandatory 10% on most developments later this year. As a general point, mitigation is not the same as compensation.</p> <p>If the roll-forward option is pursued however, the following changes in wording are suggested (<b>bold</b>), but it may be better to start again.</p> <p><i>Policy 37 Biodiversity and Geodiversity.</i></p> <p><i>The Council will <del>look to support</del> <b>require development to demonstrate measurable biodiversity net gain in accordance with NPPF policy and national legislation,</b> and:</i></p> <ul style="list-style-type: none"> <li>- <i>Conserve, protect and enhance biodiversity and geodiversity through minimising loss of valued features <b>and priority UK and local BAP habitat</b> in the landscape, such as <b>species-rich grassland, hedgerows, woodland, trees, ponds and wetland, and sites that meet the local criteria for designation as a Local Wildlife Site.</b></i></li> <li>- <i>Conserve and protect irreplaceable <del>woodland habitats,</del> such as ancient woodland or veteran trees.</i></li> </ul> <p><b>– Apply the conservation hierarchy of Avoid-Mitigate-Compensate to all developments that impacts on biodiversity, seeking in the first place to avoid impacts and then to mitigate impacts on priority habitats and</b></p>	

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		<p><b>designated sites, and only resort to compensation for habitat loss when no other options are available.</b></p> <p>- <b>Mitigate-Compensate</b> for any loss of valuable assets through applying measures for reinstatement, replacement or on / off site compensatory work that will enhance or recreate those habitats in circumstances when loss of the original habitat is unavoidable through development, <b>in accordance with legislation and local biodiversity net-gain policy</b>, and,</p> <p>- Explore opportunities to restore, enhance, create or connect with established natural habitats as an integral feature of the proposed scheme.</p> <p>Where development will have known detrimental impacts or cause lasting harm to the natural habitats in that location, <del>the Council will compensate for that loss through effective conditions in the planning decision or by seeking developer contributions to contribute towards off-site mitigation measures.</del> <b>compensation for that loss will be required through application of BNG legislation, and in accordance with Local Nature Recovery Strategy and local policy on BNG.</b></p> <p>Working in collaboration with developers, as well as local and national agencies with ecological and geological expertise, the Council will identify, conserve, protect and enhance natural assets, <b>so that biodiversity net-gain arising from development will contribute towards local regional and national Local Nature Recovery, in accordance with the</b></p>	

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		<p><b><i>appropriate objectives of Local Nature Recovery Strategies <del>habitats and species can thrive and help to create rich biodiversity within the Borough for future generations to enjoy.</del></i></b></p> <p><i>The Council will also protect trees with Tree Preservation Orders associated to them. All proposals must also take account of the guidance set out in the Council's Tree Strategy.</i></p> <p>In the 'What the Council says' text on the consultation document, this text needs some revisions: '<i>. . . the proposal will not be refused from the outset and discussion will take place between the applicant, the Council the County Council, the Woodland Trust, the Environment Agency and Natural England.</i>' The list is too prescriptive, and the inclusive of the Woodland Trust seems inappropriate among the list of statutory bodies and consultees. If charitable and non-governmental organisation are included, then this needs to be a generic category, to ensure that other bodies such as Leics and Rutland Wildlife Trust are on a level footing with Woodland Trust - but it is questioned whether it is an appropriate category of organisation to include.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b><i>61. In what ways do you consider that the Council could ensure genuine and demonstrable biodiversity net gains on all new development sites?</i></b></p> <p>The LPA should be able to refer to supplementary documentation setting out local policies towards BNG and Local Nature recovery; this would identify strategic priorities for</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering</p>

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		<p>BNG and also set out the appropriate local processes for developers to engage with – this will include the biodiversity unit cost and necessary legal mechanisms (likely to be S106, but it is proposed that a new mechanism – the Conservation Covenant – will be made by government).</p> <p>It is strongly recommended that the LPA works in partnership with other LPAs in Leicestershire so that this supplementary document is County-wide in scope to ensure consistency of approach, cost and prioritisation across the county and local authority boundaries. The LPA should identify suitable land within the Borough for BNG offsetting or offsite enhancements, but will also need to consider sites outside the constraints of the borough boundaries for investment in wider County/Regional priorities for Local Nature Recovery. The DEFRA BNG metric does incentivise on-site and local offsite/offset solutions to BNG, but this may not always be possible to achieve.</p>	<p>as part of the new Local Plan at both a strategic and local level.</p> <p>With regards to the Policy approach on Geodiversity and Biodiversity, the Council is committed to working with Local Authorities in Leicester, Leicestershire and Rutland to develop up to date evidence and understanding of this complex and ever changing aspect of Plan making.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b><i>62. Should the Council be making use of Natural England's Biodiversity Metric, or are there more appropriate ways of calculating biodiversity net gain?</i></b></p> <p>A wording correction - the current national metric is DEFRA v.3.0, not NE.</p> <p>The use of this metric is recommended, but it is understood that it is acceptable to use other standard metrics. The only other standard metric the Council is aware of is Warwickshire's, and it is appropriate to use this in our area,</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p> <p>With regards to the Policy approach on Geodiversity</p>



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		<p>but others may be developed over time that are preferable to use than the current two options. Therefore it would be sensible to allow some flexibility here – e.g. “Use of DEFRA’s BNG metric in latest versions available, or (with prior agreement of the LPA) use of another national, regional or local standard metric .” The risk of using different metric is that the BNG currency – the ‘biodiversity unit’ – may not carry the same value as DEFRA’s; this is something that would need to be investigated by the LPA if an alternative metric is used, to ensure consistency and fairness of approach and to maintain or improve standards set by DEFRA.</p> <p>The Council should set a target for Nature Recovery under new net gain policy that pushes planned development to achieve more than a minimum of 10% Net Gain. Development can play a significant role in combatting the decline in biodiversity. On sites that are already poor in biological diversity net gain will be easily achieved. However, these sites could also contribute much more than a minimum but offer opportunities for exemplar case studies of green infrastructure and biodiversity net gain opportunity. Encouraging good design in development by providing information on case studies and design guidance around ensuring biodiverse developments may help the introduction of higher targets for net gain.</p>	<p>and Biodiversity, the Council is committed to working with Local Authorities in Leicester, Leicestershire and Rutland to develop up to date evidence and understanding of this complex and ever changing aspect of Plan making.</p> <p>The specific wording correction regarding DEFRA rather than Natural England in relation to the host of Metric 3.0 is noted and will be updated accordingly.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Climate Change</b></p> <p><b><i>63. Should the Council ‘roll forward’ the current policy approach set out in Local Plan (relevant parts of) Policy</i></b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations,</p>

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		<p><b>38 – Climate Change, Flood Risk and Renewable Low Carbon Energy, ensuring that it is up to date with current national planning policy and guidance?</b></p> <p>The Plan should show a clear commitment in reflecting recent national and local climate emergency declarations and associated date policies and priorities.</p> <p>The new Plan should make specific reference to carbon reduction and link to the Transport Decarbonisation Plan where possible. Placing an emphasis on carbon reduction - particularly through the prioritisation of active travel, development of walkable communities and locally accessible facilities will be welcome to both combat climate change, but to also improve health &amp; wellbeing outcomes for residents.</p> <p>Provision should be made for infrastructure and a range of facilities to support low and zero-carbon vehicle technologies (e.g. electric vehicle charging points).</p>	<p>policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p> <p>The specific recommendations relating to cross-boundary transport and infrastructure initiatives, as well as the need to consider and prioritise more sustainable transport solutions to align the net zero agenda have been noted and will be considered accordingly moving forwards.</p> <p>The Council also welcomes partnership working to explore cross-boundary infrastructure solutions.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>64. Should the Council draft a new Policy to address Climate Change and to take account of up to date national planning policy and guidance?</b></p> <p>No comment.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>65. Should the Council remove the Policy approach and only apply the Policy principles and guidance set at a national level through the National Planning Policy Framework and the National Planning Practice Guidance?</b></p>	Noted.

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		<p>A clear, focused local policy around this area would be beneficial to the health and wellbeing of the population. Consideration and reference to its links to health inequality would also be welcomed, with climate change and associated changing exposure to extreme temperatures, increased exposure to UV and air pollution, pollen, flooding and water-borne diseases, (and additionally the impacts of extreme weather events such as storms and floods) have a high risk of impacting on physical and mental health. Particularly on our most vulnerable.</p> <p>Climate change can also impact on individuals and their financial wellbeing and safety through impact on prices of food, water and energy and access to utilities with supply chains at risk from extreme weather conditions.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Part 08. New Local Plan Issues and Options – Infrastructure</b></p> <p><b>Highways Capacity</b></p> <p><b><i>66. Should the Council and the County Council (as the local highways authority) be seeking delivery of larger scale transport and highway interventions in an attempt to reduce the current levels of congestion within the Borough area?</i></b></p> <p>The Leicester and Leicestershire Strategic Growth Plan (SGP) sets out that in order for the Housing Market Area (HMA) to</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and</p>

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		<p>accommodate the levels of growth that the area needs to/is required to take, strategic road and rail infrastructure investment is likely to be required.</p> <p>All areas of the HMA are facing highways and transport challenges to the delivery of future growth. The scale of investment required is beyond that within the gift of the Local Highway Authority to deliver and/or will be able to fund its delivery.</p> <p>Rather, HMA partners as a whole need to continue to take a coordinated approach to developing the evidence-based case both to identify more particularly the infrastructure investments required and to make the case for their delivery either through national delivery programmes, such as the Road Investment Strategy and Rail Network Enhancement Pipeline processes or (as per present arrangements at least) bids to Government. In this respect, whilst early reference to the SGP in the Introduction section of this draft Plan is welcomed, the actual new Plan needs to do more to set the context around the HMA growth pressures faced; the infrastructure challenges that this presents (which do give rise to some of the existing issues in the Borough, e.g. the relative lack of suitable orbital routes around the south and east of the City); and how HMA partners are working to tackle such problems, not just at the HMA level but at a more local level through the joint evidence work that the Borough is seeking to undertake with neighbouring districts. Subject to the outcomes of evidential work at the HMA level, traffic conditions in the Borough would likely benefit from such, for example through the delivery of any new road</p>	<p>local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects have been noted and will be considered accordingly.</p> <p>In addition, the suggestion for collaborative work on cross-boundary issues has also been noted and welcomed. Further discussions and development of robust cross-boundary evidence will be necessary between OWBC and neighbouring Authority's as their respective emerging new Local Plans progress.</p>

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		<p>around the south and east of Leicester required to open up development in the SGP Priority Growth Corridor.</p> <p>Additionally, the Local Highway Authority would expect the new Plan to provide a robust policy basis for seeking to secure developer contributions towards highways and transport measures required to support the area's growth and, subject to evidence, towards the mitigation of cross-boundary impacts. (Where appropriate the Local Highway Authority is seeking to ensure that new Plans across the HMA include policies that provide for developer contributions towards the mitigation of cross-boundary impacts.)</p> <p>Consideration must be given to sustainable travel methods.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Highways infrastructure need</b></p> <p><b><i>67. Should the Council and the County Council (as the local highways authority) be accepting that congestion will only ever increase over the Plan period as and when new development comes forward?</i></b></p> <p>Beyond a general comment that increased congestion can have damaging economic and social impacts, the Local Highway Authority is not in a position to offer a definitive view at this time. It looks forward to being involved in the Borough Council's work to develop a transport evidence base to underpin its new Plan and to identify the potential highways and transport measures that are likely to be most effective/required to support the area's future growth. Once the</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take</p>

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		Local Highway Authority has consider the outcomes of this work, it will be able to express a view.	shape.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>68. What transport and highway interventions do you think the Council and the County Council (as the local highways authority) should consider to improve congestion within the Borough area?</b></p> <p>As per the response to question 67, the Local Highway Authority looks forward to being involved in the Borough Council's work to develop a transport evidence base to underpin its new Plan and to identify potential highways and transport measures that are likely to be most effective/required to support the area's future growth.</p> <p>Consideration must be given to sustainable travel modes and behaviour change techniques to encourage and embed mode shift to sustainable travel modes.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>69. Should the Council require all development to provide contributions to support the delivery of local / strategic highway infrastructure solutions?</b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts,</p>

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		<p>In line with the Local Highway Authority response to question 66, subject to the outcomes of work to develop the new Plan's transport evidence base and to the consideration of the impacts of a particular site, the Local Highway Authority's in principle view is yes. It will also be important to ensure that the new Plan provides a robust policy basis for seeking contributions, as appropriate, towards revenue funded measures (such as to promote and encourage sustainable modes of travel), and the future maintenance of new infrastructure.</p>	<p>Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>70. Should the Council encourage applicants to provide contributions to support the delivery of local / strategic highway infrastructure solutions?</b></p> <p>As per response to question 69.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Sustainable Transport</b></p> <p><b>71. What transport and infrastructure solutions do you consider are required so that growth can come forward in the future?</b></p> <p>As per the response to question 67, the Local Highway Authority looks forward to being involved in the Borough Council's work to develop a transport evidence base to underpin its new Plan and to identify potential highways and</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p>

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		<p>transport measures that are likely to be most effective/required to support the area's future growth.</p> <p>As well as appropriate infrastructure projects significant transport benefits can be derived from using the existing network and improving the existing network for sustainable forms of travel such as cycling and walking. There is also a significant role in 'behaviour change' techniques to encourage and embed sustainable travel behaviours.</p> <p>With the right infrastructure and positioning of each primary school in a development, tailor made travel plans can be created to ensure environmentally friendly movement of pupils and parents.</p>	<p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>72. Which option from the above set of potential options would be the most appropriate for the Borough area?</b></p> <p>See responses to questions 73 and 74.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>73. Should the Council continue with existing policy approach (or similar) in the current Local Plan?</b></p> <p>Sustainable transport provision will continue to be an important element of enabling further growth in the Borough going forward (and more generally in respect of decarbonising transport to address climate change); the South East Leicester Transport Strategy Area (SELTSA) work that the Local Highway Authority is currently undertaking has a strong focus on that.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p>



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		<p>Thus, the Local Highway Authority would expect to see a policy relating to such in the new Plan, albeit with the exact nature of it potentially to be informed by the outcomes of the transport evidence and SELTSA work. Additionally, the Local Highway Authority would expect the new Plan to reflect as appropriate LTN1/20, its Cycling and Walking Strategy and soon to be published (at the time of preparing this response) Leicestershire Bus Service Improvement Plan.</p>	<p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>74. Should the Council develop a Local Policy requiring that all residential and / or large scale non-residential developments must provide on-site infrastructure or an off-site contribution to support the delivery of local / strategic sustainable transport solutions?</b></p> <p>In line with the Local Highway Authority response to question 66, subject to the outcomes of work to develop the new Plan's transport evidence base and to the consideration of the impacts of a particular site, the Local Highway Authority's in principle view is yes.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>75. Should the Council develop a Local Policy that actively promotes and encourages sustainable transport and discourages the use of the private car?</b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance</p>

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		<p>See also Local Highway Authority response to question 73. However, additionally it will be important not to disadvantage those for which private car is their only option.</p> <p>A policy like this would have the potential to create a number of health benefits, one prominent one being increasing physical activity opportunities, with the percentage of adults cycling for travel at least three days per week for Oadby and Wigston in 2018/19 being 2.0%, compared to the England value of 3.1% (Oadby &amp; Wigston District Health Profile, 2021). The percentage of physically active adults for Oadby and Wigston in 2019/20 is 52.9%. The lowest figure of all Leicestershire local authority areas and significantly lower than the England value of 61.4% (Sport England Active Lives Data).</p> <p>There are also obvious links to air quality improvements across the sustainable transport options. Although there are no AQMAs within the borough, Public Health are working with the local NHS Trusts around vulnerable group exposure (children and young people), as programmes of work have flagged that within this group there are a number of admissions due to viral wheeze and asthma, with rates higher than in other areas of the county.</p>	<p>with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<b>76. Should the Council promote improved technology and traffic management solutions to address congestion, delays and air quality issues in the Borough?</b>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>

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		<p>As per the Local Highway Authority's response to question 67, it looks forward to being involved in the Borough Council's work to develop a transport evidence base to underpin its new Plan and to identify potential highways and transport measures that are likely to be most effective/required to support the area's future growth.</p>	<p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>77. Should the Council allow for development and accept that junctions and links will continue to operate above capacity?</b></p> <p>All areas of the Housing Market Area (HMA) are facing highways and transport challenges to the delivery of future growth.</p> <p>As the Leicester and Leicestershire Strategic Growth Plan sets out, investment in strategic infrastructure will be required to enable the HMA's future growth. Subject to the outcomes of ongoing evidence work at an HMA level, if delivered some of those strategic infrastructure measures would likely benefit traffic conditions in the Borough.</p> <p>On a more local level the transport evidence base that the Local Highway Authority would expect the Borough Council to</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>

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		<p>develop to underpin the new Plan should assess the highways and transport impacts of the growth proposals for the area and test mitigating measures. Until that evidence work has been completed, it is too early to draw any sweeping, generalised conclusions.</p> <p>Notwithstanding the above, in respect of a specific site proposal that comes forward through the development management process the Local Highway Authority will continue to assess those under the prevailing requirements of the NPPF and any other relevant national or local policies, regulations, etc. Where it would be in accordance with the NPPF, etc. to do so that could mean on occasions the Local Highway Authority advising the Local Planning Authority to refuse a proposal on highways and transport grounds due to impacts on the capacity of links and/or junctions.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>78. Which option from the above set of potential options would be the most appropriate for the Borough area?</b></p> <p>See Local Highway Authority responses to questions 73 and 74.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over</p>

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			the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>79. Should the Council continue to safeguard the Potential Transport Route (former EDDR) in Oadby? If so, please provide justification / evidence of its need.</b></p> <p>Evidence work undertaken both in respect of the current Local Plan and in connection with SELSTA suggests that there remains merit in continuing to safeguard a Potential Transport Route. However, the Local Highway Authority would anticipate that this position should be reviewed in the light of outcome of the transport evidence work developed by the Borough Council to underpin its new Plan.</p>	<p>Noted.</p> <p>The Council also notes the support to continue safeguarding the Potential Transport Route (former EDDR) until further evaluation which includes the full EDDR concept / route, has been considered and assessed in the light of outcome of the transport evidence work to underpin the emerging New Local Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders, including Leicestershire County Council as the Highways Authority, over the course of the drafting the emerging new Local Plan and by doing so, these discussions can begin to take shape.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Developer Contributions</b></p> <p><b>80. Should the Council 'roll forward' the current Local Plan policy relating to Infrastructure and Developer Contributions ensuring that it is up-to-date with national policy and guidance?</b></p> <p>Yes (see Local Highway Authority response to question 66 and other questions that are similar in nature to this one). It is</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>Local planning authorities in the Housing Market Area (HMA) have mechanisms in place that enable joint working and addressing such matters under the</p>

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		<p>important to continue to ensure that all new growth is accompanied by the necessary infrastructure whilst ensuring the policy remains up to date with national policy and guidance.</p> <p>From a Public Health perspective, although the thoughts around developer contributions to health facilities are welcomed and absolutely required, there is also a role around prevention facilities and programme investment (wider determinants) that help reduce the burden and strain on the health services of the future.</p> <p>From a waste management perspective the key requirement is to ensure that development has the appropriate and necessary infrastructure to support its impact in terms of additional population and increased waste arisings.</p>	<p>Duty to Co-operate and regular reviews of a Statement of Common Ground.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects have been noted and will be considered accordingly.</p> <p>In addition, the suggestion for collaborative work on cross-boundary issues has also been noted and welcomed. Further discussions and development of robust cross-boundary evidence will be necessary between OWBC and neighbouring Authority's as their respective emerging new Local Plans progress.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<b>81. Should the Council seek to develop a new Policy approach to meeting its infrastructure and developer contribution needs?</b>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts,</p>

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		See Local Highway Authority response to question 66 and other questions that are similar in nature to this one.	<p>Regulations, policy and guidance.</p> <p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects have been noted and will be considered accordingly.</p> <p>In addition, the suggestion for collaborative work on cross-boundary issues has also been noted and welcomed. Further discussions and development of robust cross-boundary evidence will be necessary between OWBC and neighbouring Authority's as their respective emerging new Local Plans progress.</p>

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Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>82. Should the Council only allow development where there is demonstrable capacity or certainty of delivery of infrastructure such as schools / health services etc?</b></p> <p>Yes, to ensure needs can be met through sufficient infrastructure. And where its 5 year supply position would allow it to do this.</p> <p>The local plan should consider where school places can be delivered. All Oadby schools are on constrained sites to expand or would exceed LCC capacity limits. Some schools in Wigston may be on constrained sites with no chance of increasing in size. In this case we would be looking either to new school sites where cumulative numbers of dwellings warrant this (with the cost of the new school and site being split between the developer’s contribution to it), or in cases of single large developments e.g. 700 dwellings a new primary school on that site. The County Council would welcome the opportunity to discuss specific school sites and their ability / inability to expand.</p> <p>From a highways and transport perspective, the NPPF specifies those circumstances where development should be prevented or refused, i.e. “...if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.” The Local Highway Authority will continue to provide advice on development proposals in the light of NPPF and any other relevant national or local policies, regulations, etc.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects have been noted and will be considered accordingly.</p> <p>In addition, the suggestion for collaborative work on cross-boundary issues has also been noted and welcomed. Further discussions and development of robust cross-boundary evidence will be necessary between OWBC and neighbouring Authority’s as their respective emerging new Local Plans progress.</p>



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Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>83. What do you consider to be the most important service or facility and should all development contribute towards the service or facility regardless of its cost?</b></p> <p>An effective and safe transport system is key to enabling development sites to come forward (i.e. opening the land up for development); to providing access to those sites (from day-to-day needs through to emergency situations); and to providing sites with connectivity to the surrounding 'world'.</p> <p>From the perspective of waste management, the most important service provision and facility is infrastructure to support the increased waste arisings produced from the additional population brought into the area as a direct result of the development.</p> <p>School provision, including primary, secondary and Special Educational Needs and disabilities (SEND), should always be funded where required. Schools have an unparalleled importance to sustainable communities and are the social hub to the communities they serve.</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Viability</b></p> <p><b>84. Should the Council 'roll forward' the current Local Plan policy relating to Infrastructure and Developer Contributions ensuring that it is up-to-date with national</b></p>	<p>Noted.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies</p>

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		<p><b><i>policy and guidance that takes into account the requirement to develop a whole Plan Viability Assessment?</i></b></p> <p>Yes. This appears to be a sensible approach, particularly to ensure that viability is taken account of at plan making stage rather than being put forwards by developers at planning application stage which often causes more problems. It is important that the policy remains up to date with national policy and guidance and that it also takes into account the requirement to develop a whole Plan Viability Assessment to ensure policies are realistic and viable.</p> <p>The Local Highway Authority has no particular reason to suggest that the current Local Plan policy should not be 'roll forward', and is particularly keen to ensure that there remains a robust policy basis for seeking, as appropriate, developer contributions to address cumulative impacts and/or cross-boundary impacts.</p>	<p>related to all aspects of the Plan.</p> <p>In addition to this, the Council will also undertake a whole plan viability assessment, as well gather evidence for other aspects of the plan relating to infrastructure and housing choices. The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the emerging new Local Plan and by doing so, these discussions can begin to take place.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b><i>85. Should the Council seek to develop a new Policy approach to meeting its infrastructure and developer contribution needs that takes into account the requirement to develop a whole Plan Viability Assessment?</i></b></p> <p>The Local Highway Authority agrees that it is important to understand whether a Plan is viable as a whole; this minimises possible affordability issues arising at later stages of the development process, e.g. at the planning application stage.</p>	<p>Noted.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>In addition to this, the Council will also undertake a</p>

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		<p>To inform any whole Plan viability assessment, it will be important to have a robust, evidence-based assessment of the highways and transport impacts of the new Plan's development proposals and the mitigation measures required within the Borough and potentially beyond its boundaries, too.</p> <p>If a new policy approach is taken it should consider in what way it can improve on the current local plan policy, remain in line with national policy and planning guidance and accommodate requirements such as the whole plan viability assessment ensuring policies and the Plan as a whole remain realistic and viable.</p> <p>It would make sense to look at development from a whole plan approach to see if it its deliverable and what consequences there will be on infrastructure.</p>	<p>whole plan viability assessment, as well gather evidence for other aspects of the plan relating to infrastructure and housing choices. The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the emerging new Local Plan and by doing so, these discussions can begin to take place.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>86. Do you consider that there is a piece of infrastructure, service and / or facility that needs to be delivered regardless of the cost?</b></p> <p>The Local Highway Authority is not in a position to express a view at this time. It looks forward to being involved in the Borough Council's work to develop a transport evidence base to underpin its new Plan and to identify the potential highways and transport measures that are likely to be most effective/required to support the area's future growth. Once the Local Highway Authority has consider the outcomes of this work, it will be able to express a view.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage</p>

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		<p>Regarding household waste and recycling sites, developments should mitigate the impacts of the additional waste that they would generate by (where appropriate) ensuring Developer Contributions are provided to ensure capacity can be maintained at Council sites to allow for the management of waste arising from these developments, as per the County Council's Planning Obligations Policy document (10th July 2019).</p> <p>With regards school places, as hubs of communities, schools can help to transform markets, policy, education, and behaviour, increase community resilience, mitigate climate change, and prepare citizens to think and act in new and creative ways.</p> <p>All of the County's infrastructure needs to be delivered as there will be a need for it whether it is delivered through planning obligations or not. If not delivered through S106 agreements, the cost of the delivery of the infrastructure falls to the County Council as opposed to the developer and the County cannot afford to fund this deficit in provision.</p>	<p>and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects have been noted and will be considered accordingly.</p> <p>In addition, the suggestion for collaborative work on cross-boundary issues has also been noted and welcomed. Further discussions and development of robust cross-boundary evidence will be necessary between OWBC and neighbouring Authority's as their respective emerging new Local Plans progress.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>High quality communications</b></p> <p><b><i>87. Should the Council require all development proposals to provide the infrastructure for 5G phone service and / or high speed fibre broadband to every new home or unit?</i></b></p>	Noted.

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		<p>Full-fibre broadband is a critically important infrastructure now commonly referred to as the ‘fourth utility’ alongside electricity, gas and water supply. Leicestershire County Council is committed to working towards universal coverage of gigabit capable broadband infrastructure for all homes and businesses in Leicestershire, with the ‘Superfast Leicestershire’ focussed on areas not served by commercial operators. The County Council supports a principle policy objective of promoting high quality digital infrastructure to all new build developments, in order to reduce the need to travel, support higher levels of home working and inward investment and improve economic competitiveness.</p> <p>The County Council supports the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Any proposed development will be required to work with all engaged network operators to further this aspiration, and to seek to leverage improved gigabit capable network deployment to surrounding areas within the new development geographical space.</p> <p>The County Council aspires to encourage innovation within the telecommunications asset space. This includes but is not limited to the deployment of multi-use infrastructure components. Examples may include electric vehicle charging points or community WIFI hotspots.</p>	
Leicestershire County	3 <sup>rd</sup> November	<b><i>88. If the Council was to require all development proposals to provide the infrastructure for 5G phone</i></b>	Noted.

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Council	2021	<p><b><i>service and / or high speed fibre broadband to every new home or unit, what evidence would the Council need to underpin / justify this requirement?</i></b></p> <p>There is still approximately 4% of Leicestershire without access to the acceptable levels of Broadband speeds, and rural areas across Leicestershire continue to be unserved without adequate broadband connectivity.</p> <p>The Government has set targets in terms of what it considers to be fast and reliable broadband, but it should be recognised that this is a fast-changing technology. Developers should provide digital connections to meet the latest Government targets that will support the reduction in the need to travel, support higher levels of home working and inward investment and improve economic competitiveness.</p> <p>The County Council are to undertake and compile Mapping and Data Intelligence to report gaps in areas of fibre connectivity. There would be a need to be a review of number of enquiries / complaints on lack of Broadband and log areas and locations.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Education</b></p> <p><b><i>89. Should the Council require all development proposals, regardless of size, to contribute towards delivery of educational infrastructure?</i></b></p>	Noted.

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		<p>No. The County Council currently ask for educational contributions from developments of 10 and above. All major applications in line with national policy should deliver education infrastructure in the district so that there are sufficient school places to meet the needs of all residents of new development.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>90. Should the Council consider any of the other options set out above appropriate?</b></p> <p>There should be a prioritisation of infrastructure based on viability and identified need, to include all items in the Infrastructure Delivery Plan and relevant Policies, as appropriate.</p> <p>Developer Contributions mechanism should be fully up to date and take into account the Education Authority’s desired approach to delivering Education Infrastructure over the Plan period.</p> <p>There should be a requirement for only large scale (above 10 dwellings) development to contribute towards education provision.</p> <p>There should be a continuation to work closely with all relevant stakeholders, throughout both the Local Plan process and planning application process.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects relating to infrastructure delivery have been noted and will be considered accordingly.</p> <p>In addition, the suggestion for collaborative work on</p>

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			cross-boundary issues has also been noted and welcomed. Further discussions and development of robust cross-boundary evidence will be necessary between OWBC and neighbouring Authority's as their respective emerging new Local Plans progress.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>91. Should the Council only apply the policy principles and guidance set at a national level through the National Planning Policy Framework and the National Planning Practice Guidance?</b></p> <p>No. There are local issues that may require different solutions.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>92. Do you consider that there are current issues with education provision within the Borough area?</b></p> <p>At present there are no issues in the borough at the time of first entry to schools. Increases in the number of future dwellings in certain areas could lead to issues arising. Any proposed developments should take into account the County Council's response to the call for sites consultation. This describes where new extensions to existing schools and where new schools would be required. Vulnerable children and those with SEND require local schools to be funded.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Walking and Cycling Infrastructure</b></p> <p><b>93. Should the Council 'roll forward' the current policy approach set out in Local Plan (relevant parts of) Policy</b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts,</p>



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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p><b>26 – Sustainable Transport and Initiatives, ensuring that it is up to date with current national planning policy and guidance?</b></p> <p>Sustainable transport provision will continue to be an important element of enabling further growth in the Borough going forward (and more generally in respect of decarbonising transport to address climate change and in improving peoples' health and wellbeing); the South East Leicester Transport Strategy Area (SELTSA) work that the Local Highway Authority is currently undertaking has a strong focus on that. Thus, the Local Highway Authority would expect to see a policy relating to such in the new Plan, albeit with the exact nature of it potentially to be informed by the outcomes of the transport evidence and SELTSA work. Additionally, the Local Highway Authority would expect the new Plan to reflect as appropriate the national cycling infrastructure design guide LTN1/20 and its Cycling and Walking Strategy (July 2021).</p>	<p>Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects relating to cycling and walking infrastructure have been noted and will be considered accordingly.</p> <p>In addition, the suggestion for consideration of the national cycling infrastructure design guide (LTN1/20) and its Cycling and Walking Strategy (July 2021) have also been noted. The Council will also refer to the latest version of the Local Cycling and Walking Infrastructure Plan (LCWIP) for the Borough, being prepared by Leicestershire County Council.</p> <p>The Council is also actively monitoring announcement from Active Travel England (ATE) and will seek to engage with them as appropriate, in</p>

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			due course.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>94. Should the Council draft a new Policy to address Walking and Cycling Infrastructure needs in the Borough, taking account of up to date national planning policy and guidance, as well as local evidence?</b></p> <p>In addition to the response provided at question 93, local evidence does need to be considered to ensure that any policy is based on evidence and need. This can make the local plan more relevant and of most benefit to local communities.</p> <p>This policy has the potential to create a number of health benefits, such as increasing physical activity, with the percentage of adults cycling for travel at least three days per week for Oadby and Wigston in 2018/19 being 2.0%, compared to the England value of 3.1% (Oadby &amp; Wigston District Health Profile, 2021) and percentage of physically active adults for Oadby and Wigston in 2019/20 is 52.9% - the lowest figure of all Leicestershire local authority areas and significantly lower than the England value of 61.4% (Sport England Active Lives Data).</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Public Transport</b></p> <p><b>95. Should the Council 'roll forward' the current policy approach set out in Local Plan (relevant parts of) Policy 26 – Sustainable Transport and Initiatives, ensuring that it is up to date with current national planning policy and guidance?</b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		As per the response to question 93	<p>as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects relating to cycling and walking infrastructure have been noted and will be considered accordingly.</p> <p>In addition, the suggestion for consideration of the national cycling infrastructure design guide (LTN1/20) and its Cycling and Walking Strategy (July 2021) have also been noted. The Council will also refer to the latest version of the Local Cycling and Walking Infrastructure Plan (LCWIP) for the Borough, being prepared by Leicestershire County Council.</p> <p>The Council is also actively monitoring announcement from Active Travel England (ATE) and will seek to engage with them as appropriate, in due course.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>96. Should the Council draft a new Policy to address public transport infrastructure needs in the Borough, taking account of up to date national planning policy and guidance, as well as local evidence?</b></p> <p>Sustainable transport provision will continue to be an important element of enabling further growth in the Borough going forward (and more generally in respect of decarbonising transport to address climate change); the South East Leicester Transport Strategy Area (SELTSA) work that the Local Highway Authority is currently undertaking has a strong focus on that. Thus, the Local Highway Authority would expect to see a policy relating to such in the new Plan, albeit with the exact nature of it potentially to be informed by the outcomes of the transport evidence and SELTSA work. Additionally, the Local Highway Authority would expect the new Plan to reflect as appropriate the national bus strategy 'Bus back Better'; its Passenger Transport Policy and Strategy.</p> <p>The County Council is currently drafting a Bus Service Improvement Plan (BSIP) for Leicestershire, in collaboration with the county's bus operators. This stems from the government's recently published National Bus Strategy (Bus Back Better), which requires all English local transport authorities to work with operators to come up with bold plans for improving their local bus services and encouraging more people to use them.</p> <p>The Government has pledged £3 billion in funding across the country to help deliver these plans, and Leicestershire is</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects relating to public transport and bus services, as well as the County Council's emerging Bus Services Improvement Plan (BSIP) have been noted and will be considered accordingly.</p> <p>The Council is also actively monitoring announcement from Active Travel England (ATE) and will seek to engage with them as appropriate, in due course.</p>

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		aiming to secure a fair share of that funding. Oadby & Wigston is relatively well served with passenger transport but improvements can bring significant benefits in terms of highways capacity.	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>97. Do you consider that the current public transport provision within the Borough area is adequate or does it need to be improved?</b></p> <p>This appears to be a question aimed more at residents of the Borough. The Local Highway Authority is currently developing (at the time of preparing this response) in partnership with local bus operators a Leicestershire Bus Service Improvement Plan to seek to deliver on the national bus strategy ambitions to achieve a step-change in public transport across England.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Part 09. New Issues and Options Local Plan – Local Housing</b></p> <p><b>First Homes</b></p> <p><b>98. Is there robust evidence to suggest that the level of discount should be increased within the Borough area?</b></p> <p>First homes should be included within the overall requirement for affordable housing and delivered as part of an evidence-based housing mix.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p>
Leicestershire County	3 <sup>rd</sup> November	<p><b>99. Do you consider that ‘First Homes’ will be of genuine benefit to the local communities within the Borough area?</b></p>	Noted.

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Council	2021	As per the response to question 98.	<p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Technical Housing Standards</b></p> <p><b><i>100. Should the Council continue with its current planning policy approach set out within Local Plan Policy 11 Housing Choices, that requires compliance with the Governments Technical Housing Standards on new homes provided through conversions, sub-divisions and / or changes of use?</i></b></p> <p>Should the council continue with its local plan policy 11, the policy should be strengthened in respect to ensuring adequate provision is mandated for the storage of waste containers for conversions, sub-divisions and or changes of use. With potential changes proposed by the government through the recent national waste consultations, homes may need to accommodate additional containers to separate their waste including containers for food waste collection.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b><i>101. Should the Council require that all new homes provided within the Borough comply with the Governments Technical Housing Standards?</i></b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance</p>

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		As per the response to question 100.	with the relevant Government Acts, Regulations, policy and guidance.  The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Self and Custom Build</b></p> <p><b><i>Should the Council ‘roll forward’ the current policy approach set out in Local Plan Policy 14 – Self Build and Custom Build, ensuring that it is up to date with current national planning policy and guidance?</i></b></p> <p>It is appropriate that a proportion of Self and Custom Build houses be included in the housing mix for larger sites (100+) in accordance with accepted policy subject to the proviso that, following appropriate advertising, in the event that there is no market take up within a period of say 1 year from the occupation of the first house on the site the plots will be built out as part of the wider development.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b><i>103. Are there any other options available to the Council that would be appropriate?</i></b></p> <p>As per response to question 103.</p>	Noted.
Leicestershire County	3 <sup>rd</sup> November	<b>Sustainable Homes</b>	Noted.

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Council	2021	<p><b>104. Which of the above potential options do you consider to be the most appropriate?</b></p> <p>Due to the length in time of the policy, a mixture of the two main options are considered most appropriate. Over a 10-year period, it should start with a minimum of 1 option and build to include 4 options.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>105. Are there any elements of sustainable home design that have been missed from the bullet list above, that you consider would be effective in helping battle climate change and reducing energy usage?</b></p> <p>Home design and any other infrastructure should incorporate the reuse of existing materials in line with a circular economic approach of keeping materials in use for as long as possible at their highest utility and the governments ambition for a circular economy. Using existing materials and resources reduces the need for primary materials to be utilised and to be brought to site reducing carbon emissions, maintains existing resources thereby benefiting from the value and energy that already resides within those resources and increases material productivity and efficiency. Homes can be designed with secondary life cycles in mind not just one life cycle so that materials can also be recovered and reused rather than disposed at the end of the first life cycle. As such design for deconstruction, modularisation, recovery and reuse should be prioritised. In light of the pandemic also and the increasing prices of materials and risks to the supply chain of being able to deliver materials, adopting an approach that favours life</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>All of the specific examples and recommendations will be considered accordingly as the new Local Plan emerges.</p>



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		<p>cycle design and multiple life cycles and looks to use and reuse existing and secondary materials will increase the resilience in the delivery of new homes.</p> <p>The introduction of triple glazing should also be considered.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Housing Choices</b></p> <p><b><i>106. Should the Council ‘roll forward’ the current Policy approach set out in Local Plan Policy 11 – Housing Choices, ensuring that it is up to date with current national planning policy and guidance?</i></b></p> <p>No comment.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b><i>107. Are any of the other options set out above appropriate?</i></b></p> <p>There is support for the inclusion of a specific commitment to units of specialist housing offers for working age adults living with vulnerabilities i.e. Learning Disability, Physical Disability, Sensory Impairment and Mental Health problems alongside younger adults transitioning from LCC Children and Family Services to Adult Services i.e. bungalows inc wheelchair accessible developments, small developments of single person flats inc wheelchair accessibility which could be aimed at supported living. The Adults and Communities department will work with O&amp;WDC on the volume and location of such developments.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>All of the specific examples and recommendations will be considered accordingly as the new Local Plan emerges.</p>

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			As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Urban Infill</b></p> <p><b><i>108. Should the Council ‘roll forward’ the current policy approach set out in Local Plan Policy 15 – Urban Infill, ensuring that it is up to date with current national planning policy and guidance?</i></b></p> <p>No comment.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b><i>109. Are there any areas within the Borough where the policy relating to Infill development and the splitting of plots should be stronger or should not apply? For example, remove the ‘in principle’ support for infill development or splitting of plots.</i></b></p> <p>No comment.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b><i>110. Should ‘in principle’ support for infill development or splitting of plots be applied across the entire Borough area, regardless of what the proposal site is, or where it is located?</i></b></p> <p>No comment.</p>	Noted.

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Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Part 10. New Local Plan Issues and Options – Design and Character</b></p> <p><b>High Quality Design</b></p> <p><b><i>111. What is good design to you?</i></b></p> <p>This is a subjective question, and responses will be dependent on particular perspectives. From a Local Highway Authority perspective, good design should allow for the safe and efficient movement of people and goods; serve the transport connectivity, accessibility and servicing (including, for example waste collection and home delivery) needs of a particular development or area; is about the use of durable materials that are fit for purpose; and should not just look great at day one, but the quality of a development or area should be maintainable in the long term.</p> <p>More generally good design should be buildable, compliant with local and national design standards, meet the needs for all users and should take a holistic view of the proposals rather than focus on specific products or materials that are desired by the design team. Buildings should be cohesive to their local area, so residents or users feel part of a community, fit for purpose, economically viable and based upon local need.</p> <p>Any design should incorporate the reuse of existing materials in line with a circular economic approach of keeping materials in use for as long as possible at their highest utility and the governments ambition for a circular economy. Using existing</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>All of the specific examples and recommendations will be considered accordingly as the new Local Plan emerges. In particular, the recommendation to incorporate the reuse of existing materials in line with a circular economic approach of keeping materials in use for as long as possible to utilise their life cycle is noted.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>

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		<p>materials and resources reduces the need for primary materials to be utilised and to be brought to site reducing carbon emissions, maintains existing resources thereby benefiting from the value and energy that already resides within those resources and increases material productivity and efficiency. Homes and any other infrastructure can be designed with secondary life cycles in mind not just one life cycle so that materials can also be recovered and reused rather than disposed at the end of the first life cycle. As such design for deconstruction, modularisation, recovery and reuse should be prioritised. In light of the pandemic also and the increasing prices of materials and risks to the supply chain of being able to deliver materials, adopting an approach that favours life cycle design and multiple life cycles and looks to use and reuse existing and secondary materials will increase the resilience in the delivery of new homes.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>112. Should the Council be producing a criteria based policy, and if so, what criteria / design principles should be included?</b></p> <p>Yes. The Council should be producing a criteria-based policy. Within this policy, waste and recycling should be taken into account and developments should seek to mitigate the impacts of the additional waste that they would generate by:-</p> <ul style="list-style-type: none"> <li>- Being designed to allow householders to minimise the impact of their waste on the environment (such as through provision of home composting facilities).</li> </ul>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>All of the specific examples and recommendations will be considered accordingly as the new Local</p>

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		<p>- That the residential developments are designed to allow the effective segregation of recyclables and waste to ensure such waste can be managed according to the waste hierarchy. In particular it should be noted that, subject to the outcome of recent consultations, residential properties will need capacity to store separate containers for the following types of waste – green (garden); plastics; metals; glass; paper and card; food; and residual waste. As such developments should be designed to allow residents to effectively sort and store such wastes separately prior to their collection.</p> <p>- Life cycle design principles to facilitate multiple life cycles of materials to enable them to circle providing value and utility for as long as possible.</p> <p>The Local Highway Authority would expect any policy to reflect the matters raised in its response to question 111.</p>	<p>Plan emerges. In particular, the recommendation to incorporate the reuse of existing materials in line with a circular economic approach of keeping materials in use for as long as possible to utilise their life cycle is noted.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>113. Should the Council be producing locally specific design guides or rely on the National Design Guide?</b></p> <p>Yes, locally specific design guides should be produced. Specific, detailed and measurable criteria for good design are most appropriately set out at the local level.</p> <p>Locally specific design guides have the opportunity to drive new design principles and approaches such as life cycle design, design for deconstruction and modularisation. Such guides should look to build on national guidance but adopt new innovative approaches where possible to stimulate more</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage</p>

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		<p>sustainable approaches from the supply chain and let the market know that sustainable approaches are prioritised by the council. The council has an opportunity to drive best practice through such guides.</p> <p>The Local Highway Authority would expect any policy to reflect the matters raised in its response to question 111 and any policies, strategies and design guidance should comply with the County Council's Highway Design Guidance.</p>	<p>and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the Plan with regards to the inclusion of local design guide production and/or codes within the emerging Plan have been noted and will be considered accordingly.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b><i>114. How can the Council ensure that high quality design reflects the character of an area and the needs of the local community?</i></b></p> <p>No comment.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>High Quality Construction and Use of Materials</b></p> <p><b><i>115. Which one of the above potential options do you consider to be the most appropriate?</i></b></p> <p>It is noted that one of the options is to pursue an approach that requires all new development to make use of the highest quality methods of construction and use the highest quality materials and seek to refuse development proposals that do not provide this.</p> <p>The Local Highway Authority recognises the roll that high quality design can play in respect of providing safe, healthy</p>	Noted.

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		<p>and attractive environments and that reflect local distinctiveness. However, like very many other authorities across the country the Local Highway Authority has insufficient funding to maintain even its most important highway assets (such as its most heavily trafficked A roads) and accordingly does not have the funding to maintain non-standard materials; bespoke street furniture; trees in the highway; or other such elements that might be used to create high quality environments.</p> <p>From a maintenance perspective, this option would have merit if it resulted in transport infrastructure that is more durable and longer lasting and requiring fewer maintenance interventions. Notwithstanding this, where development proposals would result in unusual maintenance liabilities on the Local Highway Authority, the Local Highway Authority would require the payment of commuted sums in accordance with its prevailing guidance and policies or alternative appropriate maintenance arrangements put in place.</p> <p>Should the Borough Council choose to pursue the 'highest quality' option, the Local Highway Authority would expect to see the new Plan set out the policy position for ensuring that that quality exists not just 'at day one' but for the lifetime of the development.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<b><i>116. If you consider that the new Local Plan should require the highest levels of construction and material use, how do you consider that the Council could best require, monitor and enforce this?</i></b>	Noted.

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		<p>Through incorporating sustainable design criteria through the planning and procurement approaches to influence and inform the market as to their preferred direction for sustainable development in line with a circular economy and the governments ambition.</p> <p>See also response to question 115.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Landscape Character</b></p> <p><b><i>117. Should the Council ‘roll forward’ the current policy approach set out in Local Plan Policy 44 – Landscape and Character, ensuring that it is up to date with current national planning policy and guidance?</i></b></p> <p>No comment.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b><i>118. Are there any other options available to the Council that would be appropriate?</i></b></p> <p>No comment.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Local Green Spaces</b></p> <p><b><i>119. Should the Council ‘roll forward’ the current policy approach set out in Local Plan Policy 44 – Landscape and Character, ensuring that it is up to date with current national planning policy and guidance?</i></b></p>	<p>Noted.</p> <p>The Council will review all existing designations and associated evidence, including that for the current Local Green Spaces’</p> <p>Therefore, this representation will be taken into</p>



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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p>The Local Highway Authority notes that land within the Wigston railway triangle is designated as Local Green Space. Midlands Connect and Network Rail (to be subsumed as part of Great British Rail) are currently pursuing studies related to seeking to improve rail connectivity between Leicester (and beyond) and to what additional rail capacity might be required in the Leicester area to facilitate new rail services and provide enhanced scope for more freight to be carried by rail. Any works required to track layouts in and around the Leicester area have yet to be confirmed, but it is potentially possible that works could be required at the South Wigston junction.</p> <p>Similar to the responses within the green infrastructure section, consideration would be welcomed around accessibility and considering how would those experiencing health inequality would access the local green space? We can provide opportunities for people to increase their physical activity, but what do we do around those that aren't currently physically active? How prominent is the green space within new development? Does it feel safe? Is there any room within this section to consider alternative uses of green space? Creating and protecting food growing spaces in and around a locality can be beneficial for health and the environment both in rural and urban spaces, alongside the economy if commercial spaces are identified. This may seem aspirational, but some Local Authorities have explored this as <a href="https://www.brightonhove.gov.uk/sites/default/files/2020-09/FINAL%20Food%20PAN%202020.pdf">https://www.brightonhove.gov.uk/sites/default/files/2020-09/FINAL%20Food%20PAN%202020.pdf</a> and can be seen as timely with current concerns around climate change and carbon reduction considerations.</p>	<p>account by the Council when reviewing the current Local Green Space Review.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>120. Do any of the currently designated sites need removing from the Local Green Space designation?</b></p> <p>As per the response to question 119, the Local Highway Authority notes that land within the Wigston railway triangle is designated as Local Green Space. Midlands Connect and Network Rail (to be subsumed as part of Great British Rail) are currently pursuing studies related to seeking to improve rail connectivity between Leicester (and beyond) and to what additional rail capacity might be required in the Leicester area to facilitate new rail services and provide enhanced scope for more freight to be carried by rail. Any works required to track layouts in and around the Leicester area have yet to be confirmed, but it is potentially possible that works could be required at the South Wigston junction.</p>	<p>Noted.</p> <p>The Council will review all existing designations and associated evidence, including that for the current Local Green Spaces.</p> <p>Therefore, this representation will be taken into account by the Council when reviewing the current Local Green Space Review.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>121. Are there any new areas that should be considered for Local Green Space designation?</b></p> <p>No comment.</p>	<p>Noted.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Design Codes</b></p> <p><b>122. Which of the above potential options relating to local design codes do you consider to be the most appropriate for the Borough area?</b></p> <p>The Local Highway Authority has no particular view on the number and nature of codes.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The specific recommendation to ensure that any future Local Design Code cross-references the</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p>However, it would wish to see policies, strategies and design guidance that complies with the County Council's Highway Design Guidance and be involved with their development. This is to ensure that the codes reflect the need to provide for safe and effective provision for all appropriate/relevant modes of travel and that from a maintenance perspective they ensure that quality exists not just 'at day one' but for the lifetime of the development, including were relevant payment of commuted sums to the Local Highway Authority or the putting in place of alternative maintenance regimes.</p> <p><b>NB:</b> The Local Highway Authority is currently in the process of reviewing its highway design guide for new development. It is too early to say how this might impact on the design and adoption of new development roads in the future.</p> <p>As per earlier responses, design should be based on life cycle design so that materials can be recovered at the end of one life and be utilised in the life cycle of a second piece of infrastructure. Design for deconstruction, modularisation and reuse and recovery should therefore be prioritised.</p>	<p>latest version of the Leicestershire Highways Design Guide is noted and it is agreed that this would both improve and strengthen the Council's approach into taking account of design codes in new developments.</p> <p>The recommendation to incorporate the reuse of existing materials in line with a circular economic approach of keeping materials in use for as long as possible to utilise their life cycle is also noted.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>123. Which areas / parts of the Borough do you consider would benefit from the production of local design codes?</b></p> <p>As per the response to question 122.</p>	Noted.
Leicestershire County	3 <sup>rd</sup> November	<b>Renewable and Low Carbon Energy Production</b>	Noted.

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Council	2021	<p><b>124. Which of the above potential options do you consider to be the most appropriate?</b></p> <p>There is no particular view, albeit the Local Highway Authority recognises that reducing the carbon impact of new development is an important element of the wider agenda to tackle climate change.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>125. Are there any elements of renewable and low carbon energy infrastructure that have not been mentioned, however should be a fundamental part of new development design and build?</b></p> <p>As per the response to question 124.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Public Realm</b></p> <p><b>126. Which of the above potential options do you consider is the most appropriate?</b></p> <p>A continuation with the more generic policy approach is preferred, however more detailed public realm principles should be set out within the Public Realm Strategy Supplementary Planning Document.</p> <p>The highway authority would want to see LPA policies, strategies and design guidance that complies with the County Council's Highway Design Guidance.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The specific recommendation to ensure that any future Public Realm Policy or Supplementary Planning Document cross-references the latest version of the Leicestershire Highways Design Guide is noted and it is agreed that this would both improve and strengthen the Council's approach into taking account of design codes in new developments.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		The County Council's response to a previous consultation on the Oadby and Wigston Public Realm Strategy SPD should be considered for wider views on maintenance of public realm.	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b><i>127. What do you consider to be the most important aspects of public realm?</i></b></p> <p>There should be a neutral, high quality palette of materials to withstand the test of time. Bell Street in Wigston was paved with bright red and yellow pavers that were very dated, but actually had nothing physically wrong with them.</p> <p>Areas of public realm should be safely negotiable by all appropriate road users, including those with visual impairments.</p> <p>It also important that appropriate maintenance regimes are put in place to ensure that such area do not just look great at day one, but the quality of the area should be maintainable in the long term. Any scheme can look shabby if there are broken pavers, poor quality greenery and broken street furniture.</p> <p>Consideration should be given to appropriate and sufficient on-street recycling and waste facilities to prevent the occurrence of litter negatively impacting upon public amenity and wellbeing.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<b>Shop Fronts (including shutters)</b>	Noted.

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p><b>128. Should the Council 'roll forward' the current policy approach set out in Local Plan Policy 32 – Shop Fronts, ensuring that it is up to date with current national planning policy and guidance?</b></p> <p>Yes.</p> <p>Regarding shutters at night, they tend to create an atmosphere of everywhere being boarded up. What could help is to have shutters that have slots in them to allow light to percolate through. This means at night a better atmosphere in the street is created.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>129. Should the Council remove the policy approach and only apply the policy principles and guidance set at a national level through the National Planning Policy Framework and the National Planning Practice Guidance?</b></p> <p>No.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Part 11. New Local Plan Issues and Options – Economy, Retail and Leisure</b></p> <p><b>Cafés, restaurants etc (night time economy and dwell time)</b></p> <p><b>130. Empty A1 Retail use units are often the subject of Change of Use planning applications to A5 Hot Food Takeaways. Should the Local Authority continue to protect empty A1 retail units until they can be filled?</b></p>	<p>Noted.</p> <p>The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, consideration around these discussions can begin to take place.</p> <p>With regards to the specifics around the role of health impact assessment and also the number and</p>

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		<p>In order to attract visitors to the Town centres there needs to be a vibrant retail offer and the more independent shops that exist the better as this creates a niche offer that is different to other centres. Multiples may continue to close branches and especially if they are in large units these may remain unfilled for some time. Is it better to have no empty spaces and lots of takeaways or lots vacant space? Alternative uses need to be encouraged such as small makers which will then further encourage footfall or Community uses. The Council offices could be moved into the town centre, or the library, now that less space is required.</p> <p>A change of use from retail to a hot food takeaway without the requirement for scrutiny would create the risk of increased access to unhealthy foods, which links to healthy weight and associated public health indicators. Oadby and Wigston are currently better than the average for England on adult and childhood obesity indicators, significantly so in adults. Increasing the prevalence of hot food takeaways may impact upon this indicator.</p> <p>There is not an assumption that all hot food takeaways serve solely unhealthy food, and there also needs to be consideration around work with proprietors around their food offer, or is there the capacity to do so? Local Plan policies could expand more upon the mention of Public Health impacts being considered. Are there are programmes Environmental Health run (for example) around supporting businesses to offer healthy options?</p>	<p>location of takeaways, the Council has already begun to work proactively with Public Health on this matter and welcomes the opportunity to continue doing so.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>131. Should the current Policy position set out within Local Plan Policy 36, be broadened to appropriately manage the provision of hot food takeaways, and encourage greater provision restaurants, cafes and other relevant uses?</b></p> <p>Yes.</p> <p>Whilst it is acknowledged above that takeaways may serve healthy options, the Local Plan should continue to assess the cumulative effect of the potential undesirable outcomes from high concentrations of outlets selling unhealthy foods and drink, no matter what category the establishment sits within.</p> <p>The cumulative effects are identified within a number of areas of consideration, but Public Health impacts does not seem to be explicitly mentioned in this context.</p> <p>Consideration should be given to appropriate and sufficient on-street recycling and waste facilities to prevent the occurrence of litter negatively impacting upon public amenity and wellbeing.</p>	<p>Noted.</p> <p>The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, consideration around these discussions can begin to take place.</p> <p>With regards to the specifics around the role of health impact assessment and also the number and location of takeaways, the Council has already begun to work proactively with Public Health on this matter and welcomes the opportunity to continue doing so.</p> <p>The recommendation to consider appropriate and sufficient on-street recycling and waste facilities may also be usefully be considered as part of the Council’s approach to enhancing Public Realm in and around new development, as well as existing centres and areas where people congregate..</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>132. How big of a role do you think the Council should play in relation to the provision of hot food takeaways and the potential negative impacts on local communities health and wellbeing?</b></p>	<p>Noted.</p> <p>The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so,</p>



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		<p>If people choose to consume this food, they will do so regardless. However, it would be better to encourage restaurants and takeaways that offer alternative healthy food. There could be a consideration of limiting the number of takeaways as a percentage of total units.</p> <p>As per the response to question 131, this provision and access to potentially unhealthy foods risks a direct impact on the residents of Oadby and Wigston and their physical and mental health.</p> <p>The Leicestershire Healthy Weight Strategy (2021-26) states: “Obesity is a complex and multifaceted problem that requires coordinated, effective action to change the food, physical activity and social environments from ‘obesogenic’ to ones which promote a healthy weight. If we are going to take effective action to reverse obesity at population level, we need to work together with partners in a ‘whole systems’ approach to create an environment that facilitates healthy choices and supports individuals to achieve and maintain a healthy weight.”</p> <p>This whole system approach is pivotal to improve and maintain the health of residents and their ownership over their health, reducing health inequality and reliance on support services. We all have a part to play in this.</p> <p>As per the response to question 131, consideration should be given to appropriate and sufficient on-street recycling and waste facilities to prevent the occurrence of litter negatively impacting upon public amenity and wellbeing.</p>	<p>consideration around these discussions can begin to take place.</p> <p>With regards to the specifics around the role of health impact assessment and also the number and location of takeaways, the Council has already begun to work proactively with Public Health on this matter and welcomes the opportunity to continue doing so.</p> <p>The recommendation to consider appropriate and sufficient on-street recycling and waste facilities may also be usefully be considered as part of the Council’s approach to enhancing Public Realm in and around new development, as well as existing centres and areas where people congregate.</p>

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Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Delivering Retail</b></p> <p><b><i>133. Should the Council be commissioning an up-to-date retail capacity study for each of its main centres?</i></b></p> <p>Yes.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b><i>134. Although Permitted Development Rights have been extended, the NPPF retains the statement that planning policies should support town centres and take a positive role in their growth, management and adaptation. With that in mind, should the Council continue to protect the Borough areas retail offering in the new Local Plan?</i></b></p> <p>Yes.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b><i>135. Is there any flexibility that could be woven into planning policy to reflect the potential economic uncertainty ahead?</i></b></p> <p>Yes, although it is not easy to see how this could be achieved.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b><i>136. Should the Council be applying greater flexibility in relation to the proportion of retail units...should the Council be allowing greater proportions of cafes, bars and restaurants within its main centres?</i></b></p> <p>Yes, however there should still be a limit.</p>	Noted.

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Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Local Impact Thresholds</b></p> <p><b><i>137. Should the Council be maintaining a locally set Local Impact Threshold for each of its main centres?</i></b></p> <p>Yes.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b><i>138. Is an update of the retail capacity study required to ensure the impact thresholds are still appropriate?</i></b></p> <p>Yes.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b><i>139. Has development outside the Borough increased the vulnerability of towns and local centres within the Borough, for instance the Fosse Park expansion in Blaby District?</i></b></p> <p>Yes.</p> <p>Fosse Park was primarily a retail destination not just for clothing but for white goods and furniture. With the new expansion it is now an attraction for food too, which could weaken the position of the towns within the borough.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Primary and Secondary Frontages</b></p> <p><b><i>140. Are Policies 27 'Primary Shopping Frontages' and Policy 28 'Secondary Shopping Frontages' still fit for purpose and do they conform to national planning policy and guidance?</i></b></p>	<p>Noted.</p> <p>The changes to the Use Classes Order (and how this is changing the role of retail centres) has been noted and will be considered accordingly moving forwards.</p>

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		<p>Yes. The shrinkage of the secondary areas may be a method for concentrating the Town Centres and encouraging dwellings in preferred areas.</p> <p>Consideration should also be given to appropriate and sufficient on-street recycling and waste facilities to prevent the occurrence of litter negatively impacting upon public amenity and wellbeing.</p>	<p>The Council will review all existing designations, including Primary and Secondary Frontages in the Borough's Town and District Centres as part of the emerging Local Plan.</p> <p>Therefore, this representation will be taken into account by the Council when considering the retail evidence it may need to support the emerging Local Plan.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>141. Would a less strict approach to controlling the use types on our shopping frontages act as a potential buffer to the threat that the expansion of permitted development rights from E Class units to C3 dwellings poses?</b></p> <p>Yes. This approach could result in a free-for-all.</p>	<p>Noted.</p> <p>The changes to the Use Classes Order (and how this is changing the role of retail centres) has been noted and will be considered accordingly moving forwards.</p> <p>Therefore, this representation will be taken into account by the Council when considering the retail evidence it may need to support the emerging Local Plan.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>142. Although changes to permitted development rights affect town and district centres considerably, should the Council maintain a local policy approach, as during the lifetime of the new Local Plan, there may be further unexpected changes to the Planning System that will affect the national policies under consideration now?</b></p>	<p>Noted.</p>

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		Yes. A Local policy approach should be maintained.	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>143. Should the Council be removing the policy approaches relating to the high levels of provision of retail uses within town centres?</b></p> <p>No. The policy should not be removed, instead it should be adjusted.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Tourism</b></p> <p><b>144. Should the Council draft a new Policy to address Tourism and the Visitor Economy in the Borough, taking account of up-to-date national planning policy and guidance, as well as local evidence?</b></p> <p>Yes.</p> <p>Although Oadby &amp; Wigston is not dedicated as a Tourism Hub in the Leicester and Leicestershire Tourism Growth Plan as it does not have a significant cluster of attractions that would be defined as a “visitor hub” within the sub-region, the main strength is business tourism.</p> <p>Due to the close proximity to Leicester, the borough could attract linked trips. The Natural Asset of the Grand Union Canal runs through the borough and linked trips from Foxton trips or the City Centre could be vital.</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>All of the specific recommendations will be taken into consideration as thoughts develop in this Policy area.</p>

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		<p>Leicester Conferences in Oadby is one of our largest business tourism venues/complexes. Leicester Racecourse also has a good business tourism offer with corporate entertainment and meeting venues. It is a major attractor in the borough that could bring in spend in the local centres, if there was something to offer to people rather than people getting into their cars and leaving the area as soon as a meeting is finished. College Court is a lovely hotel with 123 bedrooms. They are available to the general public as well as business event guests.</p> <p>There is a new visitor offer planned for Stoughton Grange – a retail complex and food and drink offer. Attractions also include Leicester Airport (which does flying experiences), the Botanic Gardens, Shady Lane Arboretum. There was also a pilgrimage walk and festival planned in partnership with Harborough DC.</p> <p>As a cross reference to the Heritage section there is interesting industrial history in Wigston (Framework Knitters). It would be worth pulling these assets together and finding a way to make them more appealing as a cohesive visitor offer.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>145. Should the Council only apply the Policy principles and guidance set at a national level through the National Planning Policy Framework and the National Planning Practice Guidance?</b></p> <p>No, this would not be adequate.</p>	Noted.

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Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Part 12. New Local Plan Issues and Options – Health and Wellbeing</b></p> <p><b>Open Space, Sport and Recreation Facilities</b></p> <p><b><i>146. Should the Council ‘roll forward’ the current policy approach set out in current Local Plan Policy 9 – Open Space, Sport and Recreation Facilities, ensuring that it is up to date with current national planning policy and guidance?</i></b></p> <p>The national reference to the increased focus on and importance of public open and green spaces around the pandemic is very important, although it must also be recognised that there were stark inequalities identified around access to this within our populations and quality of these spaces. Inequality around access to green and open space was linked to deprivation and health inequality.</p> <p>Recognition within the local plan chapter around benefits to public health, wellbeing and quality of life are a positive within the existing local plan and to carry this over would be welcomed, particularly post pandemic.</p> <p>Policy 9 sets out several requirements for open space, sport and recreational facilities which are welcome, however these 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</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p>

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		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.	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>147. Do you consider that there are more appropriate options relating to the delivery of open space, sport and recreation facilities in relation to new development?</b></p> <p>Depending on where sports facilities are required, it may be appropriate to place adjacent, or on school sites to ensure maximum use and benefit to the community.</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p>Built leisure facilities</p> <p><b>148. Should the Council draft a new Policy to address Built Leisure Facilities needs in the Borough, taking account of up to date national planning policy and guidance, as well as local evidence?</b></p> <p>Public Health would always advocate services and facility planning based on local evidence and need. This gives the best chance of tackling local health inequality and improving health and wellbeing for residents.</p> <p>The policy includes reference to the Playing Pitch strategy supporting identification of need, but is a similar assessment for sports facilities present? Would this be helpful in ascertaining demand and need as an outcome of</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>



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		development? Are health needs aligned with planning for built leisure facilities?	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>149. Should the Council only apply the Policy principles and guidance set at a national level through the National Planning Policy Framework and the National Planning Practice Guidance?</b></p> <p>No comment.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>150. Do you consider that the Borough area is deficient in a certain type of built leisure facility?</b></p> <p>No comment.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>151. Do you consider that the Borough area has a surplus in a certain type of built leisure facility?</b></p> <p>No comment.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Built health facilities</b></p> <p><b>152. Should the Council ‘roll forward’ the current policy approach set out in Local Plan Policy 46 – Infrastructure and Developer Contributions, ensuring that it and supporting evidence is up to date with current national planning policy and guidance?</b></p> <p>The commitment of ‘The Council is committed to maintaining and enhancing the health and wellbeing of its residents’ is</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over</p>

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		<p>particularly welcomed. The ongoing dialogue with the CCG will be particularly helpful for looking at system pinch-points and overload, but could the prevention element be expanded much more, if we are ever to solve demand outstripping supply? This goes further than takeaways and green space and covers air pollution exposure, sustainable food, financial wellbeing, cohesion safety and many other wider determinants. HIA could help with this (see response to question 157 &amp; 158).</p> <p>Nationally there is some work around built health facilities being co-located with physical activity provision (such as leisure centres) to allow for greater connection between health and physical activity. It would be welcomed to see exploration of this in new developments and its viability within the borough, with its limited space to expand. This could simplify the opportunity to promote and deliver increasingly active lifestyles and impact on health outcomes.</p>	<p>the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>153. Should the Council draft a new Policy to address Built Health Facility needs in the Borough, taking account of up to date national planning policy and guidance, as well as local evidence?</b></p> <p>Public Health would advocate the need for local evidence, through work with the CCG and Public Health, alongside patient representation. HIA could help with this (see also response to question 157 &amp; 158).</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take</p>

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			shape.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>154. Should the Council only apply the Policy principles and guidance set at a national level through the National Planning Policy Framework and the National Planning Practice Guidance?</b></p> <p>No comment.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>155. Do consider that the Borough area is deficient in built health facilities?</b></p> <p>No comment.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>156. Do you consider that the Borough area has about the right amount of built health facilities?</b></p> <p>No comment.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Health Impact Assessments</b></p> <p><b>157. Should the Council 'roll forward' the current Local Plan policy relating to Health Impact Assessments (Policy 5) with wording amendments where necessary?</b></p> <p>Yes. The continuation of the current policy around HIA requirement would be much welcomed by Public Health. As the NPPF states this is a useful tool to assess the health needs and potential development impacts on residents and therefore supports the Council's commitment to the health and</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by</p>

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		<p>wellbeing of the residents of Oadby and Wigston. It can demonstrate why things have been done and decisions have been made, in a clear transparent way for Members and communities to understand.</p> <p>Wording may need to be amended around the screening stage, as there is now a local interactive process available to support developers to do this, using the online 'Healthy Place Making' tool (development being led by Active Together <a href="http://www.healthyplacemaking.co.uk">www.healthyplacemaking.co.uk</a>).</p> <p>A pilot programme is currently being delivered within the county, with the approval of the Strategic Planning Group and Planning Officers Forum around HIA at both a Local Plan and development level. The Local Plan strategic HIA pilot is being led by Public Health in partnership with district Local Authorities and aims to develop and refine the HIA process to set strategic priorities for the whole area covered by a Local Plan. The underpinning pilot work focuses on HIA on developments, with the assessment developed to accompany planning permission applications. This pilot work is supported by the tool portal identified above. We have one developer currently piloting this process and providing feedback.</p>	<p>doing so, these discussions can begin to take shape.</p> <p>The specific recommendations regarding the local interactive process available to developers via the online '<a href="#">Healthy Place Making</a>' tool (development being led by Active Together and in partnership with Public Health) will be considered moving forwards.</p> <p>The Council has committed to working in partnership with Public Health to understand how the role of Health Impact Assessment can be strengthened and therefore this representation will also help to feed into the emerging policy in the Local Plan.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b><i>158. Should the Council remove the policy approach and only apply the policy principles and guidance set at a national level through the National Planning Policy Framework and the National Planning Practice Guidance?</i></b></p> <p>No.</p>	Noted.

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		<p>There are multiple reasons to use HIA to tackle health inequality and look more closely at the risks development can cause to health, identify possible mitigations to this and also identify positive impacts to maximise for the communities we serve. To remove the policy could reduce the clarity over how Oadby and Wigston will measure its commitment to the health and wellbeing of its residents.</p> <p>Looking at Public Health data, there has been a reduction in healthy life expectancy for those within the least deprived decile. This is a key example of something that can be looked into in more detail within the HIA, and impacts from development assessed, mitigated and monitored; <a href="#">fingertips link</a></p> <p>Following general NPPF policy guidance may provide 'high-level' considerations, but not looking at the population profile in a deeper more targeted manner. The HIA process at Local Plan and development levels also allows the possibility to monitor suggested harm mitigation and record positive impacts for sharing success more widely.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Part 13. New Local Plan Issues and Options – Local Services</b></p> <p><b>Car parking / electric vehicle car parking</b></p>	Noted.

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		<p><b>159. Should the Council 'roll forward' the current policy approach set out in current Local Plan Policy 34 – Car Parking, ensuring that it is up to date with current national planning policy and guidance?</b></p> <p>Unless there is evidence to suggest the contrary, the Local Highway Authority would be happy for the current policy to be 'rolled forward'.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>160. Should the Council be requiring all new development to provide Electric Vehicle Charge points, so that occupiers have the ability to utilise modern technologies?</b></p> <p>Yes. Given the vastly expanded EV charging provision that will be needed in most locations in future to support the mass transition to EVs, EV charging points should be a standard feature of all new developments (with any exceptions being very rare).</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>161. Should the Council be requiring provision of Electric Vehicle Charge points in all new homes that are delivered?</b></p> <p>Yes, and where accessible to a driveway. Given the vastly expanded EV charging provision that will be needed in most locations in future to support the mass transition to EVs, EV</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and</p>

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		charging points should be a standard feature of all new developments (with any exceptions being very rare).	local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>162. Should the Council be requiring provision of enabling infrastructure for Electric Vehicle Charge points in all new homes that are delivered?</b></p> <p>Given the vastly expanded EV charging provision that will be needed in most locations in future to support the mass transition to EVs, from the Local Highway Authority's perspective it would seem more appropriate that EV charging points should be a standard feature of all new homes (with any exceptions being very rare) and not just enabling infrastructure provided.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>163. Are any of the other options set out above appropriate?</b></p> <p>No comment. See response to questions 159 to 162.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Community Facilities</b></p> <p><b>164. Should the Council 'roll forward' the current policy approach set out in Local Plan Policy 7 – Community Facilities, ensuring that it is up to date with current national planning policy and guidance?</b></p> <p>It is agreed that the loss of community facilities can have a substantial impact on people's quality of life, health and</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping</p>

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		<p>wellbeing, including social connectivity and cohesion. OWBC continually monitoring and assessing the local community's needs would be welcomed to support health and wellbeing needs, and HIA (mentioned above) is an ideal tool to help this, though assessing health need of residents and also the 'monitoring' impact and mitigation stage.</p> <p>We would support the recognition of the value that non retail community facilities such as Libraries, museums, and centres for community learning have on contributing to the mental wellbeing of communities - a counterpoint to the physical wellbeing that open spaces, parks and leisure centres have. Such facilities draw people into town centres and can act as a compliment to retail offers.</p> <p>Opportunities to co-design or reimagine spaces that reflect the heritage of a local community and give people the chance to make use of community space to create and learn would be supported.</p>	<p>to inform policies related to on or off site infrastructure delivery such as this.</p> <p>The Council has committed to working in partnership with Public Health to understand how the role of Health Impact Assessment can be strengthened and therefore this approach will also help to feed into the emerging policy in the Local Plan.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>165. Should the Council require all development proposals, regardless of size, to contribute towards delivery of community facilities?</b></p> <p>HIA would allow a clear, impartial, evidenced based approach to considering the impact of development and whether mitigating factors to health risk could be around contribution towards community facilities. This would be best to be done at a strategic Local Plan level.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site</p>



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			<p>infrastructure delivery such as this.</p> <p>The Council has committed to working in partnership with Public Health to understand how the role of Health Impact Assessment can be strengthened and therefore this approach will also help to feed into the emerging policy in the Local Plan.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>166. Are any of the other options set out above appropriate?</b></p> <p>No comment. See response to questions 164 &amp; 165.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>167. Which community facility is needed in your area to mitigate the impact of growth?</b></p> <p>The Childcare Act 2006 places a duty on the County Council for the provision of sufficient childcare places and early education. Leicestershire's Planning Obligations Policy requests, where a need is shown, that developers pay for 8.5 places per 100 dwellings on developments with 100 dwellings or above. If a new school is required, additional land will also need to be made available free of charge.</p> <p>In the first instance new early learning facilities will be placed on a primary school site. A developer can also build a community use building which can be used by a pre-school or they can also build a purpose-built nursery and lease this to a childcare provider.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p>

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		<p>All commitments to green space and leisure are welcomed as we know the benefits this has on physical and mental health. Of particular note would be the inclusion of community allotments which bring communities together, provides access to green space and horticulture is evidenced and celebrated for its benefits to health and wellbeing.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Cemetery and Burial Space</b></p> <p><b><i>168. Should the Council 'roll forward' the current Local Plan policy relating to the Oadby Cemetery Allocation with wording amendments to ensure that it is up-to-date with current national planning policy and guidance?</i></b></p> <p>No strategic comments from the Local Highway Authority at this time. But, any specific proposals coming forward through the development management process for a cemetery of off Gartree Road would be subject to consideration by the Local Highway Authority in accordance with prevailing national and local policies, guidance, etc., including, for example, in respect of the creation of a safe site access for vehicles and pedestrians. Significant investment (by the 'developer') could be required to ensure safe access.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b><i>169. Should the Council remove the current Local Plan policy relating to the Oadby Cemetery Allocation?</i></b></p> <p>As per response to question 168.</p>	Noted.

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b><i>170. Do you consider that the Council should be allocating land for cemetery and / or burial space in the new Local Plan?</i></b></p> <p>No comment.</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Part 14. New Local Plan Issues and Options – Heritage</b></p> <p><b>Conservation Areas</b></p> <p><b><i>171. Should the Council continue to protect conservation areas from unacceptable development, by maintaining local planning policy in the new Local Plan?</i></b></p> <p>Yes, however it is unclear based on the consultation documentation whether this covers both Policies 40 and 41. While the former provides general and effective policy coverage for the wider historic environment, encompassing both designated and non-designated assets, Policy 41 particularly addresses the requirements of development within the Conservation Areas and effective management of the character. Consequently, both should be retained. The policy context should however take into account recent changes to the NPPF, and might make reference to the special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses afforded by Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to heritage, including Conservation Areas.</p>

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Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>172. Are there any areas of the Borough that are not currently designated as conservation areas, however you believe they should be?</b></p> <p>No, however a programme of on-going reappraisal and assessment should be considered, to ensure consistent application of policy, awareness of on-going change/threat to the asset(s) and up-to-date appreciation of the Borough's historic environment.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to heritage, including Conservation Areas.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>173. Are there any areas of the currently designated conservations areas that should be removed from the designation?</b></p> <p>As per the response to question 172 but in addition, reappraisal should also consider how the local listing of assets may contribute to the overall management and protection of the resources.</p>	<p>Noted.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Listed and locally listed buildings</b></p> <p><b>174. Should the Council 'roll forward' the current Local Plan policy relating to Culture and Historic Environment Assets with wording amendments as and where necessary and a local evidence base update?</b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping</p>

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		<p>Yes, the current consultation appears to define a relatively narrow definition around the extent and scope of designated and non-designated assets, with a strong focus on the built historic environment. The borough however possesses a rich and diverse resource comprising assets of diverse character assets and date, the scope of this is well covered in the full wording of Policy 40, further reinforced by the supporting preamble (10.4.1 – 10.4.6). It is recommended that the Policy and preamble are repeated in full.</p>	<p>to inform policies related to heritage.</p>
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>175. Should the Council undertake a review of the Schedule of Locally Listed Buildings to establish whether or not to retain or amend the Schedule?</b></p> <p>Yes, active curation of the list should be considered, both to supplement and to remove buildings, structures or site that meet the local listing criteria. Reference should be made to on-going national pilot projects currently underway, sponsored by the former Ministry of Housing, Communities &amp; Local Government (now Department for Levelling Up, Housing and Communities).</p>	Noted.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>176. Are there any buildings or structures within the Borough area that are of heritage significance that should be placed on the Schedule of Locally Listed Buildings?</b></p> <p>This is unknown at present. The current local list is relatively extensive and has benefitted from wide consultation, reference however could be made to the Leicestershire &amp; Rutland Historic Environment Record, as a source of complementary</p>	Noted.

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		heritage data, and primary listing of the Borough's archaeological heritage assets (both designated and non-designated).	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>Part 15. New Local Plan Issues and Options – Masterplanning</b></p> <p><b>Large scale change and place making</b></p> <p><i>177. Which of the approaches set out within the above potential options above do you consider to be the most appropriate in ensuring larger scale development contributes towards providing sustainable development?</i></p> <p>The preferred option is to 'maintain the current policy approach set out at Local Plan Policy 3 – Regeneration Schemes and Large Scale Change, within the new Local Plan. Ensuring that it is up-to-date with current national planning policy and guidance'.</p> <p>Masterplans not only give indication of future land use options, they provide the necessary strategy should funding opportunities become available at short notice and assist in providing evidence of need. Some authorities are very good at producing shovel ready projects at a moment's notice should funding become available. We need to become more adaptable at this as the Levelling Up Fund has demonstrated.</p> <p>In general terms, the Local Highway Authority supports the concept of master planning; done well, it should enable</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>With regards to the specific reference to the need to consider modes of sustainable travel, such as cycling and walking, the Council is also actively monitoring announcement from Active Travel England (ATE) and will seek to engage with them as appropriate, in due course.</p>

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		<p>coordinate and cohesive thinking that enables the ‘nature’ of the development (e.g. is it a simple housing development or a truly new community) to be articulated, which will help to inform the assessment of the development’s highways and transport impacts. Master-planning should also be about establishing external connectivity needs, influencing both points of a site’s access/egress and the on-site layout.</p> <p>Nationally and locally (e.g. through the Government’s LTN1/20 and the Local Highway Authority’s Cycling and Walking Strategy) there is ambition to provide much improved facilities for cyclists and pedestrians, most particular by segregating these modes of travel in urban areas. Thus, the Local Highway Authority would expect that in future, master planning exercises should have a far greater emphasis on the consideration of provision for those that cycle and walk.</p>	
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>178. What do you consider to be the key principles of place making?</b></p> <p>From an Local Highway Authority perspective, ensuring that places provide a safe environment for road users; that new ‘places’ are appropriately connected and integrated into surrounding highways and transport systems, in order to provide safe and effective accessibility to/from the ‘outside world’; and that appropriate maintenance regimes are put in place to ensure that a place does not just look great at day one, but that its quality is maintainable in the long term.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p> <p>With regards to the Policy approach on Geodiversity and Biodiversity, the Council is committed to</p>

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		Masterplans, development briefs and other large-scale plans should ensure that Biodiversity net-gains requirements have been accommodated. This should include on-site measures to accord with the policies in NPPF requiring integration of biodiversity within development, as well as the location and broad principles for off-site and off-set net-gain arrangements, in accordance with legislation and national policy, demonstrating how these BNG measures will contribute towards objectives within Local Nature Recovery Strategies	working with Local Authorities in Leicester, Leicestershire and Rutland to develop up to date evidence and understanding of this complex and ever changing aspect of Plan making.
Leicestershire County Council	3 <sup>rd</sup> November 2021	<p><b>New Local Plan SA Scoping Report</b></p> <p><b>179. Any general comments?</b></p> <p>No comment.</p>	Noted.
Leicestershire Police	29 <sup>th</sup> August 2022 (outside of consultation period response)	I am writing to you in my capacity as the Leicestershire Police Designing out Crime Officer. I have reviewed the information on the Oadby & Wigston Council web site. In respect to the NPPF in respect to Public Realm and our strategy, we would be grateful to continue to work with Oadby and Wigston Council to develop a progressive strategy which supports the Council, Businesses and Residents to provide a safe place to trade, shop and enjoy the facilities provided in this area. I do think there is further areas of development which we can progress moving forward, which does include local Policing resources. Currently there is the Wigston Police Station located at Bull Head Street and operational responses emanate from several Hubs around the area.	<p>Noted.</p> <p>As part of this work, the Council has already begun and will continue to regularly engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions will continue to take shape.</p>



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		<p>Also I would look to progress with collaboration in respect to new build housing and other planning issues such as commercial, retail and community facilities. The night time economy including licencing and community safety is another area where mutual support can assist both Council and Police to develop effective strategies whilst providing a safe and enjoyable environment for residents and visitors, which is also in line with Government guidance.</p> <p>The Police would also look to provide further comment within future stages of Oadby and Wigston Councils Emerging Local Plan with the support of the Council. Leicestershire Police value the partnership working which has been progressing over a long period and hope to continue developing it as part of your Local Plan.</p>	
Local Resident	29 <sup>th</sup> October 2021	<p><b>Introduction</b></p> <p>This document has been compiled in response to the current public consultation on the local plan and raises several issues with the current and proposed Oadby &amp; Wigston Local Plan.</p> <p>Due to lack of time to draft a full response to the consultation I will only address the main issues with the current and proposed Local Plan and the planning process employed by the Oadby &amp; Wigston LPA.</p>	<p>Noted.</p> <p>The Council would like to thank the local resident for taking time to read through the consultation documents and for responding.</p>
Local Resident	29 <sup>th</sup> October 2021	<b>The ambiguous wording of the different policies</b>	Noted.

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		<p>There appears to be an issue with the wording of the different policies I found that words like "inclusive" are often misrepresented. To my best understanding, in the view of LPA, inclusive design means that a building blends with the environment. The current Local Plan only mentions inclusivity in connection to decreasing crime rates, there is no mention of inclusion in terms of providing safe and accessible environments for people living with disabilities, medical needs or otherwise vulnerable populations. As a result, local plans can appear to consider inclusivity yet in practice this may not be the case. Similarly, there seems to be a lack of clarity regarding other policies such as those addressing Health and Wellbeing as they seem to imply that health and safety are planning considerations, yet in practice, the LAP does not consider these to be part of the planning process.</p> <p><b>Suggested action:</b></p> <p>The local plan should contain a glossary specifying what different terms and wordings mean to avoid misunderstanding, enhance user experience and assure fairness.</p>	<p>This suggestion will be given consideration when drafting the new emerging Local Plan document.</p>
Local Resident	29 <sup>th</sup> October 2021	<p><b>Lack of clarity of what different policies mean and lack of clarification of what factors are considered in the planning decision-making process.</b></p> <p>In Part 1: NEW LOCAL PLAN – ISSUES AND OPTIONS REGULATION 18 CONSULTATION, section 2.1 the LPA states:</p>	<p>Noted.</p> <p>This suggestion will be given consideration when drafting the new emerging Local Plan document.</p>

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		<p>"The National Planning Policy Framework (NPPF), 'sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced'. Further, '<i>planning law requires that applications for planning permission be determined in accordance with the development plan<sup>2</sup>, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions</i>'."</p> <p>Response:</p> <p>In my communication with the LAP, LAP stated on multiple occasions that NPPF and the Planning Practice Guidance are not a material consideration in determining planning applications. I believe that the above statement does not reflect the current practices employed by the LPA and the development committee.</p> <p>Suggested action:</p> <p>The local plan should contain a provision/s specifying what is the role of the NPPF and The Design Guide in determining planning applications.</p> <p>Response:</p> <p>It is unclear what "development plan<sup>2</sup>" refers to in this section, however, assuming that it refers to the new Local Plan and the</p>	

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		<p>SPDs the following statement again does not reflect the current practices employed by the council. LAP and a local councillor who is a member of the development committee both stated on multiple occasions that Local Plan and SPD's are the only considerations in determining planning applications and that there are no other material considerations that the council would take into account. The council holds a view that health, safety, medical needs and needs arising from disability, as well as, needs of children including children in need are not material considerations. NPPF states that the courts often do not specify what exactly are material considerations, meaning that there is quite a broad range of issues that can be considered in the planning process.</p> <p>Suggested action:</p> <p>The local plan should contain a provision/s specifying whether the council takes material considerations into account when determining planning applications. Furthermore, if the council wants to set out rules about what are and what are not material planning considerations, such rules should be written into the Local Plan and public consultation should be held with all resident and stakeholder groups including groups with protected characteristics under Equalities Act 2010, PSED. Furthermore, the council should take a review of the legal casework in this matter to avoid legal costs to the taxpayer and individual residents.</p>	

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Local Resident	29 <sup>th</sup> October 2021	<p><b>Lack of regard for spatial strategies required to accommodate people with disabilities and medical needs.</b></p> <p>In the Oadby &amp; Wigston Local Plan 2019, there is a lack of any mention of provisions that would cater for people with disabilities and medical needs, as well as the needs of the current consultation</p> <p>Suggested action:</p> <p>The local plan should contain a glossary specifying what do different terms and wording mean to avoid misunderstanding and assure fairness.</p>	<p>Noted.</p> <p>This suggestion will be given consideration when drafting the new emerging Local Plan document.</p>
Local Resident	29 <sup>th</sup> October 2021	<p><b>Lack of adherence to the national published guidelines regulations and legislation that set out the basic requirements for achieving inclusivity in architectural and urban design.</b></p> <p>After a review of the council's past decisions and policies, it is our view that in its appraisal of planning applications, the council leans towards valuing façade design and the overall aesthetic appeal of the buildings' exterior over the functionality and interior design. It is our understanding that the council's rationale for this prioritisation is the safeguarding of the benefits of the wider community which appears to be interpreted very narrowly as promoting local views on aesthetics and heritage.</p> <p>I believe that architectural and urban quality should be not viewed only as a sum of detailing, decor, legibility, spatial</p>	<p>Noted.</p> <p>This suggestion will be given consideration when drafting the new emerging Local Plan document.</p> <p>The Council will be undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing.</p>

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		<p>arrangements, and quality of materials, but should also address accessibility and inclusivity issues, such as those experienced by disabled, vulnerable, elderly, marginalised residents including groups like travellers and parents with young children. I would like to also draw closer attention to the extensive register of listed properties within the Oadby &amp; Wigston borough, particularly to the absence of any examples of inclusive architectural design among the listed properties. Most properties are listed as having a value due to age and architectural detail such as windows (bay, casement, or circular), brickwork (colour, pattern), roofs (pitched, hipped, etc.), gables etc. However, there is no mention of inclusivity, and we have not found any register of inclusive buildings published by the local authority. There appears to be also discrepancies between the local authority's declared aims of achieving equality, health and opportunity for all and the impact of its actual policies (current O&amp;W Local Plan and supplementary documents have no mention of inclusivity in terms of disability and vulnerability of the residents).</p> <p>While it is our understanding that a lot of the guidance that the local authority is relying on mentions aesthetics alone as a hallmark of good architectural design, a lack of recognition of additional needs and reasonable adjustments when making planning decisions do lead to the creation of unsuitable and unsafe environment and increases occupants vulnerability (Healthy Homes, The Journal of the Town and Country Planning Association 2021 Vol. 90, No. 5/6,).</p> <p>It appears that the LPA hold a view that the building will last longer than the need of an individual, and this is why disability-</p>	

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		<p>related needs are not a planning consideration. I do worry about how prevalent this opinion is. One of the issues with this opinion is that as it assumes that the future users of any given building are unlikely to have disabilities or benefit from inclusivity. This one-size-fits-all approach treats disabilities as an afterthought as if the needs for inclusive housing and environment are transient and will eventually go away. As a result, priority is given to the needs of unknown future users over the current users. This is despite the fact that the lifespan of most buildings is somewhere in the range of 60-80 years, which is often less than a lifetime of an individual. I think this is an important consideration when dealing with children and young adults with disabilities. most young people with complex needs are reliant on a support that is localised and are as a result likely to remain in one area for a long time. This is, however, not to say that the needs of the ageing population should be ignored because of their age. In general, the needs of ageing populations including vulnerabilities, disabilities and medical needs are here to stay and will be ever-increasing. Moreover, any care that people with disabilities and medical needs receive is only as good as the environment in which it is delivered. This is not only a moral question, allowing people with disabilities to participate in society and live comfortable lives makes also economical sense.</p> <p>However, the main concern is that there is a real shortage/absence of inclusive accommodations. There appears to be a cycle in which some planning authorities actively discourage the creation (and adaptation) of inclusive housing based on individual needs, meaning that when these</p>	

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		<p>populations look for inclusive homes there are none to be found.</p> <p>Suggested action:</p> <p>To bring the Local Plan in line with the best practice standards the LPA should bring its policies in line with the national published legislation and guidance that sets out the minimum requirements for achieving inclusive design:</p> <ul style="list-style-type: none"> <li>• The Equality Act 2010 (replacing Disability Discrimination act 1995 and DDA2005)</li> <li>• Human Rights Act 1998</li> <li>• Part M of the Building Regulations</li> <li>• Regulatory Reform (Fire Safety) Order 2005 (RRO).</li> <li>• Special Educational Needs and Disability Act 2001 (SENDA).</li> <li>• The Autism Act 2009</li> <li>• Public Sector Equality Duty</li> <li>• Care Act 2014</li> <li>• The National Planning Policy Framework 2018 (NPPF)</li> <li>• Planning and access for disabled people: a good practice guide</li> <li>• Statutory guidance for Local Authorities and NHS organisations to support the implementation of the Adult Autism Strategy</li> <li>• RIBA CPD Core Curriculum, 02 Health, safety and wellbeing 2017</li> <li>• Health Building Notes</li> <li>• National Planning Policy Guidance (2014)</li> </ul>	



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Local Resident	27 <sup>th</sup> October 2021	<p><b>Part 03: Housing need</b></p> <p>Does the current housing need estimate of 148 homes per year take account of the very high rate of extension to properties within Oadby? Where homes are extended to accommodate an additional family or part thereof, this should be offset against new homes requirements.</p> <p>Oadby and Wigston is already built-up almost to capacity. The Borough should certainly not accommodate the city's additional housing needs; Leicester has allowed huge amounts of student accommodation to be built instead of housing its own residents.</p>	<p>Noted.</p> <p>The Council would like to thank this Local Resident for taking time to read through the consultation documents and for responding.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will also inform policies related to housing.</p>
Local Resident	27 <sup>th</sup> October 2021	<p><b>Part 04: Employment need</b></p> <p>The Borough should not use the output of the HENA to specify its employment needs because the nature of the Borough is essentially residential.</p> <p>A new Employment Land and Premises Study should not be necessary as the previous planning policy document was produced within the last five years.</p> <p>Any new employment land requirements should be met by using brownfield sites created by redundant premises.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently undertaking evidence gathering in terms of housing and economic need at a strategic and local level and the findings of these studies will also inform policies related to employment.</p>
Local Resident	27 <sup>th</sup> October 2021	<p><b>Part 05: Retail Hierarchy</b></p>	<p>Noted.</p> <p>With regards to the specifics around the role of</p>

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		<p>It would have been useful to include what the existing centre hierarchy is, for reference.</p> <p>No further allocations for retail use should be made when existing permissions have not been utilised, and there are redundant/vacant retail units.</p> <p>Retail allocation should <b>absolutely</b> be split evenly between the existing centres so that people have access without unnecessary travel.</p> <p>A greater mix of retail types would be a good thing; at present, food outlets and charity shops are too dominant.</p> <p>Too many food outlets, particularly take-aways are very bad both for the local environment (takeaway food and drink containers frequently feature in road-side littering) and for people's health as takeaway food does not provide a balanced diet.</p>	<p>health impact assessment and also the number and location of takeaways, the Council has already begun to work proactively with Public Health on this matter and welcomes the opportunity to continue doing so.</p> <p>The recommendation to consider appropriate and sufficient on-street recycling and waste facilities may also be usefully be considered as part of the Council's approach to enhancing Public Realm in and around new development, as well as existing centres and areas where people congregate.</p>
Local Resident	27 <sup>th</sup> October 2021	<p><b>Part 06: Green infrastructure, green wedges and countryside</b></p> <p>There is no evidence that the Council has promoted green corridors to allow residents to walk within the borough away from roads. Some footpaths within urban areas are poorly maintained and the Borough Council has failed to put pressure on the County Council to properly maintain rural footpaths, which have been allowed to become overgrown.</p>	<p>Noted.</p> <p>The Council will seek to work in partnership with key organisations and stakeholders to consider these points in more detail.</p> <p>The Council will also seek to make green infrastructure assets more accessible to all.</p>

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		<p>Sports centres should not be considered part of green infrastructure; they are built infrastructure, and include substantial car parks.</p> <p>Since the production of the previous Local Plan, the Borough Council allowed a large housing development (Stoughton Park) on what was previously identified as green wedge.</p> <p>The Council has an indifferent record of properly maintaining existing green space; Brocks Hill country park lacked a warden for a protracted period and even now, the visitor centre, with café and toilets, has very limited opening hours, which restricts visits from residents who need access to these facilities.</p> <p>The area of land behind Windrush Drive, whose status as recreational green space could and should have been assured many years ago, is still neither secure, nor cared for. Properly managed, this area could be greatly enhanced and make a greater contribution to biodiversity. Large areas of neglected bramble mass have very little benefit for people or wildlife.</p>	
Local Resident	27 <sup>th</sup> October 2021	<p><b>Part 07: Habitats, Biodiversity and Climate Change</b></p> <p>A much stronger position needs to be taken to protect established trees and established gardens, for example by large extensions, paving over front gardens, erection of impenetrable fences etc. If gardens are destroyed this seriously affects biodiversity and wildlife, decreases carbon uptake and increases rain-water run-off, which can contribute to flooding.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>

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		<p>Monty Don, of BBC's Gardeners' World, recently identified paving over gardens as one of the most harmful things that individuals can do for the environment.</p> <p>The concept that environmental damage from development can be mitigated is, quite simply, wrong. A mature oak tree can support up to 20,000 species. Planting new woodland somewhere else would take several generations to restore the loss, if it could ever be restored. For this reason, following Natural England's Biodiversity Metric would probably not be useful.</p>	
Local Resident	27 <sup>th</sup> October 2021	<p><b>Part 08: Infrastructure</b></p> <p>Because the Borough is already very built-up there is little opportunity to improve, in particular, transport infrastructure. This creates a major problem, as identified in the consultation document. However, the pressure on existing roads and lack of additional school and health care provision did not prevent the planning consent for the Stoughton Park development.</p> <p>The fact that there is currently no transport modelling data information available for the strategic transport assessment currently in preparation makes it impossible to comment.</p> <p>An explanation of what "on-site infrastructure or an off-site contribution to support the delivery of local / strategic sustainable transport solutions" actually means would be helpful.</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p>

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		<p>Improved technology and better traffic management could go some way to easing traffic congestion, but the traffic is a consequence of the increasing population of the Borough.</p> <p>The best use of the EDDR corridor would be to use it as a green corridor for walking and cycling, both as sustainable transport and for recreational use, particularly if it could be extended as an off-road route to access the Leicestershire countryside.</p> <p>Development should only get planning permission if there is demonstrable capacity or certainty of delivery of infrastructure such as schools and health services, and all development should contribute to the costs, not just larger developments.</p>	
Local Resident	27 <sup>th</sup> October 2021	<p><b>Part 09: Technical Housing Standards</b></p> <p>The Council should require that all new homes provided within the Borough comply with the Governments Technical Housing Standards, including new homes provided through conversions, sub-divisions and / or change of use.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>
Local Resident	27 <sup>th</sup> October 2021	<p><b>Part 09: Sustainable homes</b></p> <p>There is still much work to be done to determine what will be best practice in the long term. For example: heat pumps may or may not provide adequate levels of warmth in houses; if they do not, then expensive electric top up heating may be required.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>

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		<p>Sealing homes, suggested by some to prevent heat loss has, sensibly, been omitted from bullet point list! It would be more likely to cause problems than to solve them.</p> <p>In a low rainfall region such as Leicestershire, it is hard to see how water energy producing technology could be effective. Built in solar photovoltaic energy producing technology could be effective, even more so on commercial premises and especially on large premises such as large supermarkets and distribution centres.</p> <p>Grey water collection and recycling should be obligatory, both to reduce flooding and to save water, and electricity for pumping it. (A friend lived in an old coaching inn in Leicestershire, which had a “water room” in the basement; if they needed it then, we need it now!).</p> <p>In new developments there is a marked reduction in garden space and trees. These help to absorb carbon, slow down rainfall run off and reduce excess temperatures in hot weather. Green roofs were not amongst the bullet points, and probably should be.</p>	
Local Resident	27 <sup>th</sup> October 2021	<p><b>Part 010: Design</b></p> <p>Compared with “what the Government says”, the Council’s expectations are weak. We have had some poor quality developments in Oadby, which will not meet the long term criteria of being attractive places to live. When plans for</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>

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		developments are put out for public view, they need to be far more specific and binding about the design and layout, including orientation, green space, green corridors, use of topography etc. and the public should be able to comment.	<p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The Council will also seek to develop a local design guide and/or codes to evidence the emerging Plan and this representation will be considered accordingly.</p>
Local Resident	27 <sup>th</sup> October 2021	<p><b>Landscape character</b></p> <p>The document focusses on existing conservation areas rather than seeking to improve the general environment of the Borough. Very few residents are fortunate enough to live in protected areas. Ugly, entirely paved (often weedy) frontages to houses; destroyed verges; vehicles parked on pavements, trees cut down – these all contribute to a depressing, neglected look. Would it be possible to have local planning control that forbids total destruction of a garden to turn it into a parking lot? A requirement to at least plant and nurture just one tree or a group of shrubs would make all the difference.</p>	Noted.
Local Resident	27 <sup>th</sup> October 2021	<p><b>Local green spaces</b></p> <p>No space currently designated as a local green space should be removed from that criterion; they should be improved and therefore valued as a community asset.</p>	<p>Noted.</p> <p>Local green space designations stem from nationally set Legislation and their designation is a way to provide special protection against development for green areas of particular</p>

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		<p>There appears to be only one designated green space in Oadby; why are there not more, for example, the area behind Windrush Drive; Fludes Lane or the area of woodland near the pool behind Bluebell Way? During the Covid 19 lockdown, the paths through these areas were well used, and clearly areas for tranquillity and relaxation.</p>	<p>importance to local communities.</p> <p>Further information can be found on the Governments website:  <a href="https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space">https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space</a></p> <p>Should residents or stakeholders wish to nominate areas of land to be considered for designation as Local Green Spaces, these should be submitted to the Local Authority and they can then be considered accordingly as the emerging New Local Plan progresses.</p> <p>With regards to the specific recommendations set out in this representation, the Council will liaise with the resident accordingly.</p>
Local Resident	27 <sup>th</sup> October 2021	<p><b>Design Codes</b></p> <p>The area around Manor Road; Manor Road Extension; Launde Road; Woodfield Road etc. in Oadby has experienced a large number of property extensions of a fairly uniform type, and usually involving the destruction of a front garden. Could a design code(s) be used to produce higher quality, more environmentally friendly developments that would be at least as pleasant as what has been lost?</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take</p>



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			<p>shape.</p> <p>The Council will also seek to develop a local design guide and/or codes to evidence the emerging Plan and this representation will be considered accordingly.</p>
Local Resident	27 <sup>th</sup> October 2021	<p><b>Renewable and low carbon energy production</b></p> <p>The plan should require not only all new developments to have decentralised renewable or low carbon energy supply systems built into its design and build, but also existing buildings that are being substantially redeveloped.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>
Local Resident	27 <sup>th</sup> October 2021	<p><b>Part 011: Delivering retail</b></p> <p>Despite the changes in planning law making it easier for change of use from retail, and the effects of Covid 19, the Council should continue to encourage a vibrant mix of retail outlets in the three district centres. The Covid 19 changes could turn out to have been temporary and people may return to in-store retail shopping as a leisure activity. What is undesirable, as the document states, is to have premises that are closed during the day and open only at night; it gives a cold, unwelcoming feel to any place.</p>	<p>Noted.</p> <p>The specific recommendations relating to the retailing &amp; leisure sector and the changes to the Use Classes Order (and how this is changing the role of retail centres) has been noted and will be considered accordingly moving forwards.</p>
Local Resident	27 <sup>th</sup> October 2021	<p><b>Part 012: Open space, sport and recreation facilities</b></p> <p>The Council's response to what the Government's White Paper and NPPF sets out is weak and not well explained.</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and</p>

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		<p>“The NPPF also recognises the role that public rights of way, heritage assets and Local Green Spaces can play in enhancing the network of facilities in the area.”</p> <p>Walking out of the door for a local walk, run or cycle ride is environmentally friendly, accessible, time effective, cost-free, and helps to maintain physical and mental well-being. Relatively few people go to sports centres, as doing so requires dedicated time, money and usually a car to get there.</p> <p>There is a lack of joined-up green space within the Borough. A far stronger policy needs to be adopted to preserve and enhance the visual appearance of the borough’s streets, for example, preventing vehicles obstructing pavements, so that people are encouraged to walk, run and cycle. The linking up of walking and cycling routes and ensuring, for example, that they are lit at night could help.</p> <p>The adventure playground at Brocks Hill has been refurbished, which is good to see. Uplands Playing Field has some adult outside gym equipment, but the worn out, smaller pieces of equipment (the rowing machine and air-walker etc.) have been removed and not replaced. It would be good to have these replaced as the new adult equipment is too big and heavy for older or smaller people (like me) to use (and I miss them).</p> <p>These local playing fields could be enhanced; Uplands is well-used, and a safe space because there are always people</p>	<p>local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p>

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		there, yet they are not mentioned in the planning document as green space.	
Local Resident	27 <sup>th</sup> October 2021	<p><b>Part 013: Car Parking</b></p> <p>All development should provide adequate off road car parking, with infrastructure to charge electric vehicles. To better use available space, car parking should, wherever possible, be below ground, or roof parking over commercial property. It would be expensive, but the amount of land available in the borough for new building is now extremely limited. The introduction of car parking charges is unlikely to help the long term viability of the three district centres</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>Any future Local Design Guide or Code will cross-reference the latest version of the Leicestershire Highways Design Guide. It is considered that this would both improve and strengthen the Council’s approach into taking account of design codes in new developments.</p>
Local Resident	27 <sup>th</sup> October 2021	<p><b>Part 013: Cemetery space</b></p> <p>If the allocated cemetery space were to be “green burial” in nature it could be woodland and have permissive footpaths through it, thereby providing a dual function both as a burial ground and accessible green space.</p>	Noted.
Local Resident	27 <sup>th</sup> October 2021	<p><b>Part 013: Community facilities</b></p> <p>There is a lack of secular community space in the borough. Now that the schools are academies they have no obligation to provide community facilities, such as adult education classes, even though several were built as Community Colleges.</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p>

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		<p>All new development of any size or type should have to contribute (via section 106 money) to the provision of secular community space, possibly by helping to finance adult education facilities in schools.</p> <p>Regarding the Stoughton Grange development, the provision of health centres seems inadequate.</p>	
Local Resident	27 <sup>th</sup> October 2021	<p><b>Part 014: Conservation areas</b></p> <p>There are very few conservation areas in Oadby, and the most important of those is the Oadby Hill Top and Meadowcourt Conservation Area, including the University Botanical Gardens. These are an extremely important green space containing a great variety of plants, trees and biodiversity, and providing a major amenity within the Borough. The Knoll, one of the listed, historic buildings in the gardens has now been closed, and its future is of concern to those who care about the gardens. The wording of the Conservation Areas Supplementary Planning Document does not preclude the possibility of development in the future, should an application be made.</p> <p>The Council should strongly oppose any development in Oadby's conservation areas, in view of the lack of green space and heritage in this part of the borough.</p>	Noted.
Local Resident	29 <sup>th</sup> October 2021	<b>Planning Policy Public Consultation</b>	<p>Noted.</p> <p>The Council welcomes this support.</p>

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		The format of this planning consultation was a huge improvement on the tabulated format of previous ones. Much more user friendly.	
Local Residents	25 <sup>th</sup> October 2021	<p><b>Consultation response</b></p> <p>N.B. some of the evidence links won't open directly from word – but will if you copy/paste into Google. They are secure sites.</p>	<p>Noted.</p> <p>The Council would like to thank these Local Residents for taking time to read through the consultation documents and for responding.</p>
Local Residents	25 <sup>th</sup> October 2021	<p><b>Part 01 Introduction</b></p> <p>The following quote from para 1.4 is the most important for the whole set of documents, the highlighted part being the most vital:</p> <p><i>“.....the Council is seeking to ensure that there is a balanced strategy that encourages sustainable development and growth across the Borough area, whilst <b>helping to tackle climate change and protecting those areas that most need it.</b>”</i></p>	Noted.
Local Residents	25 <sup>th</sup> October 2021	<p><b>Headline Overall comments:</b></p> <p>1. Thank you for clear, easy to use format and very simple presentation of key issues you want responses to. You have a hard job, way too soon after the 2019-31 Plan. So, wherever you can, save your time, costs, and energy by rolling over policies that work with minimum update and minimum review/audit. It's only 2 years since the whole plan was agreed – so, if it ain't broke, don't mess with it.</p>	<p>Noted.</p> <p>The Council welcomes this support.</p>

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Local Residents	25 <sup>th</sup> October 2021	2. We do understand the constraints of the NPPF that you work with. There's been a decades-long gross imbalance in favour of development, to the detriment of the environment. That appears to be getting worse. This plan is being prepared at a time of accelerating climate crisis. The urgency to better protect the environment is ever stronger. So the Council has to do everything possible to shift what balance it can back in favour of the environment, as strongly as possible.	Noted.
Local Residents	25 <sup>th</sup> October 2021	3. If the chosen 'topic' areas in this consultation are putative chapter headings for the new Local Plan, that's very concerning. The loss of <b>Protected Places</b> is a very retrograde step. It's been a brilliant solution in the current 2019-31 Plan, bringing all the Borough's at risk assets together under one cohesive heading which clearly demonstrates the Council's aim of ' <i>protecting those areas that most need it.</i> ' (as in para 1.4 of this consultation introduction). The framing provided by that chapter heading, <b>Protected Places</b> , gives clarity and strength to the Council's aims, and has been endorsed by the Inspectorate within the last 2 years. Put it back – it's too good to lose! Besides, we had to fight you to get Local Green Spaces in the Protected Places chapter in the first place – we don't want to have the same battles all over again. And it was endorsed by the Inspector.	Noted.  The chapter headings that have been selected to represent the Policy groupings as included within the consultation draft are fluid and therefore, representations such as these are welcomed.  However, the chapter heading 'Protected Places' no longer fits the direction of travel for the emerging new Local Plan, although as stated, ' <i>protecting those areas that most need it</i> ' is most certainly a key objective of the Council's emerging Plan.
Local Residents	25 <sup>th</sup> October 2021	4. <b>Local Green Spaces</b> and <b>Landscape and Character</b> were a good fit in the previous <b>Protected Places</b> . They do not fit at all in section 10 of the consultation, least of all alongside	Noted.  The Local Plan must be prepared in accordance

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		Construction and Use of Materials, or Shop Fronts! This re-framing, has split <b>Local Green Spaces</b> and <b>Landscape and Character</b> from sitting alongside <b>Green Wedges</b> and <b>Countryside</b> , as in the 2019-31 plan. Stop it!	with the relevant Government Acts, Regulations, policy and guidance.  The specific recommendations will be taken into consideration accordingly as the emerging the new Local Plan progresses.
Local Residents	25 <sup>th</sup> October 2021	5. Whereas <b>Green Wedges</b> and <b>Countryside</b> are put as Strategic Challenges, <b>Local Green Spaces</b> and <b>Landscape and Character</b> are downgraded as merely Local Challenges. The aim of <i><b>‘protecting those areas that most need it.’</b></i> is a strategic challenge: precisely because they are under threat from the presumption in favour of development. The ability to withstand pressure for development, legitimately within the NPPF guidelines, will be strengthened by a clear endorsement of <i><b>‘protecting those areas that most need it.’</b></i> as a <b>Strategic challenge</b> .	Noted.  The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.  The specific recommendations will be taken into consideration accordingly as the emerging the new Local Plan progresses.
Local Residents	25 <sup>th</sup> October 2021	6. In the 2019-31 Plan, <b>Green Infrastructure</b> Policy 8 is in chapter 5, with the background text including references to <b>Green Wedges</b> and <b>Countryside</b> . The latter two then have their own specific policies (42 and 43) in Chapter 10 <b>Protected Places</b> . It may be that this consultation has separated <b>Green Wedges</b> and <b>Countryside</b> and put them under the heading <b>Green Infrastructure</b> as a means of highlighting their particular importance in the face of two things:  <ul style="list-style-type: none"> <li>• Proposed government reforms to a zonal system under which permission on sites earmarked for development would</li> </ul>	Noted.

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		<p>be given automatically. (Possibly now being slightly backtracked after fierce opposition from leafy Tory shires... we'll have to wait and see whether that's just words.)</p> <ul style="list-style-type: none"> <li>The fact that all the sites so far submitted are in either <b>Green wedge</b> or <b>Countryside</b>.</li> </ul> <p>In his 6 October '21 speech to Tory conference the prime minister said houses should not be built on green fields. The implication is that brownfield sites will be the new focus, and the proposals for overhaul of planning rules will not go ahead. That possible reversal makes it far easier for the Chapter heading of <b>Protected Places</b> to be-introduced. The key environmental challenges need to be in one, cohesive grouping – as in the <b>Protected Places</b> Chapter in the 2019-31 Plan. Put them together in a strong section and you've immediately got a stronger argument – for all of them.</p>	
Local Residents	25 <sup>th</sup> October 2021	7. Those are key points – with specifics at relevant parts in the later section responses.	Noted.
Local Residents	25 <sup>th</sup> October 2021	<p><b>Part 02 Overarching Policy Areas</b></p> <p><b>1. Time period:</b></p> <p>A) Period of adoption to 2041 makes some kind of sense. However, it's redolent of 1984 double-speak since the current plan is 2019-2031, yet the aim is for that to now be superseded by 2023, 4 years after adoption!</p>	Noted.



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		<p>B) The requirement for an up to date evidence base also includes the risk that it can be challenged as out of date at any point that government requirements change, or the impacts of climate change increase. You can't do anything about those built in catch-22 risks.</p> <p><b>2. Key Stakeholders:</b></p> <p>Must include all interested local community groups, formal local, regional and national organisations with oversight of environmental issues and tree welfare, and all residents and resident groups who have demonstrated explicit interest by responding to consultations during preparation and sign-off of the current 2019-2031 plan. Good that the Dept have an open approach to inviting responses, and adding to their database of consultees.</p>	
Local Residents	25 <sup>th</sup> October 2021	<p><b>Part 03 Housing (Strategic Challenges)</b></p> <p><b>Housing Need</b></p> <p>1. Evidence of Housing Requirement:</p> <p>To our knowledge, the Borough has been formally identified as having insufficient land to meet the 'requirement' set - by whatever method. The increase from annual need for 50 homes to the 180 homes cited in para 4.8 is a 260% increase: for a Borough acknowledged as already full.</p> <p>We suggest the Borough needs to:</p>	<p>Noted.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>The Council will also undertake evidence gathering in terms of infrastructure and transport at a strategic and local level and the findings of these studies (and all evidence base) will inform policies related to</p>

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		<ul style="list-style-type: none"> <li>• Stick to the current 148</li> <li>• Collect maximum robust evidence to withstand pressure to go beyond that figure, including the increase in requirements for each of the other local authorities across the same period.</li> <li>• Challenge population growth predictions from ONS. e.g. see for example the following article. Word refuses to open the link but copy paste into Google gives you the article. <a href="https://bylinetimes.com/2020/12/16/lies-damned-lies-and-housing-statistics/">https://bylinetimes.com/2020/12/16/lies-damned-lies-and-housing-statistics/</a></li> </ul> <p>Interesting, also that annual 30,000 house building target may be reduced following Tory party October conference.</p> <ul style="list-style-type: none"> <li>• Review past outcomes of cooperation/negotiations (HENA) to identify where maximum pressure has come from, and work with allies to withstand pressures from the City.</li> <li>• HENA is taking place anyway. Calculations have to take account of major recent population changes many/most of which will increase the City’s ability to meet its own housing needs more than any of the other local authorities:</li> </ul> <ul style="list-style-type: none"> <li>- Loss of life due to Covid (stats show higher fatalities amongst densely populated households, deprived areas, and ethnic minorities.)</li> <li>- Loss of households who have returned to EU after Brexit</li> <li>- Reduction in University students due to Covid and fewer foreign students</li> <li>- Reduction in use of offices due to working from home (COVID) and business failures (Covid and Brexit)</li> <li>- Decline in High street retail premises</li> </ul>	<p>housing and new development, including that related to the consideration and assessment of specific sites put forward for new growth opportunities.</p> <p>As part of this work, the Council has already begun and will continue to regularly engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions will continue to take shape.</p> <p>For example, 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.</p> <p>The Local Plan will consider a variety of sites by size and location to determine the best options for delivering the Borough’s housing requirement.</p> <p>All sites received to date via the Call for Sites process in 2020 and 2021 will be taken into account accordingly.</p>

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		<p>- Planning changes permitting easier change of use for offices, student accommodation and retail.</p> <p>As a small Borough vis a vis the other cooperating authorities the pressure will be to accept yet further increases. Given the objective to 'help tackle climate change and protect those areas that most need it', those pressures need to be withstood robustly using all of the above strategies.</p> <p>2. No to using the 180 figure</p> <p>3. See answer to 1. above re collecting evidence and allies before and during the HENA process.</p> <p>4. I can't put an evidenced figure on housing need. But it's quite clear that any increase will be detrimental to the main objective: 'help tackle climate change and protect those areas that most need it'. What we have is pressure from developers to make money, and housing that is too expensive. The pressure is passed to local authorities by government as 'requirement'. There are numerous articles evidencing that there is not a housing shortage. E.g.</p> <p><a href="https://medium.com/@ian.mulheirn/part-1-is-there-really-a-housing-shortage-89fdc6bac4d2">https://medium.com/@ian.mulheirn/part-1-is-there-really-a-housing-shortage-89fdc6bac4d2</a></p> <p>Exec Director and Chief Economist at the Tony Blair Institute. Formerly Oxford Economics, SMF and HM Treasury economist.</p>	

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		5. No, the Borough shouldn't be taking the City's unmet need – they have way more flexibility for change of use to solve whatever their 'shortage' is deemed to be – see 1. above.	
Local Residents	25 <sup>th</sup> October 2021	<p><b>Housing Density</b></p> <p>One answer - yes roll forward the current Local Plan wording with whatever minor adjustments. It's aimed at a sound compromise to take account of local circumstances already, and it's proved successful in implementations – so, if it ain't broke, don't fix it.</p>	Noted.
Local Residents	25 <sup>th</sup> October 2021	<p><b>Affordable Housing</b></p> <ul style="list-style-type: none"> <li>• If you need to put 'living' in front of wage....</li> <li>• and 'affordable' in front of housing...</li> <li>• Then you need to put 'failed' in front of country.</li> </ul> <p>It's a rigged system, and the Council has little choice but to play within the 'rules'. Berlin has just made an interesting move towards requisition property into public ownership to address a cost of living crisis:</p> <p><a href="https://novaramedia.com/2021/10/04/berlin-just-voted-to-abolish-major-corporate-landlords/">https://novaramedia.com/2021/10/04/berlin-just-voted-to-abolish-major-corporate-landlords/</a></p> <p>Response to questions:</p> <p>1. Maintain the current split targets for each of the 3 parts of the Borough: they have a logic which makes sense.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently undertaking evidence gathering in terms of housing and economic need at a strategic and local level and the findings of these studies will also inform policies related to affordable housing targets.</p>

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		<p>2. Increase those percentage targets.            3. Amend the qualifying threshold.            4. The key issue is how robust the Council will be in withstanding the usual pattern of developers agreeing %age at outline then arguing to cut back at full planning stage. The new Local Plan needs ways of building-in formal resistance to such pressures.</p>	
Local Residents	25 <sup>th</sup> October 2021	<p><b>Gypsy and Traveller Need</b></p> <p>Yes roll forward current criteria based assessment.</p> <p>The Gypsy and Traveller community have a church on city land accessed off Dorset Avenue in the Borough. It has a large congregation providing for the community living in other authority areas. There is also an annual Fun Fair on Sturdee Road Park – so the Borough is well known to gypsy and traveller families. Question to the Dept: Does the current assessment take into account that there are several pressures for static and transit accommodation sites in the neighbouring areas of the City, Blaby, and Harborough, as well as the other County districts?</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently undertaking evidence gathering in terms of housing and economic need at a strategic and local level and the findings of these studies will also inform policies related to Gypsy and traveller Need.</p>
Local Residents	25 <sup>th</sup> October 2021	<p><b>Older Persons' Housing</b></p> <p>1. Given the stats on age distribution, it makes sense to require a percentage of dwellings for older people in 'large sites'. Encouragement will get nowhere, and "Off-site" contribution will too small, avoided completely, or get funnelled into expensive private sector provision.</p>	<p>Noted.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies</p>

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		<p>2. Yes, of course the needs of younger people should be considered as well.</p> <p>3. The problems will be in reaching any consensus definition on what the 'right type' of housing is for either group.</p>	<p>related to all aspects of the Plan.</p> <p>The Council will also undertake evidence gathering in terms of infrastructure and transport at a strategic and local level and the findings of these studies (and all evidence base) will inform policies related to housing and new development, including that related to the consideration and assessment of specific sites put forward for new growth opportunities.</p>
Local Residents	25 <sup>th</sup> October 2021	<p><b>Part 04 Employment (Strategic Challenges)</b></p> <p><b>Need</b></p> <p>A) Possibly the hardest issue on which to attempt to predict the future, given the rapid and dramatic changes of just the past few years, e.g.: vastly expanded Gig economy; increased 'self-employment' such as internet deliveries; working from home, and attendant reduced use of office space. Brexit and Covid have had huge impact. E.g. Might demand for warehouse space increase to counteract just-in-time-delivery problems due to Brexit? Also, what will the impact be of the proposed East Midlands ZEDE – which would include the Borough within the 25 mile radius of the airport?</p> <p>B) Do the department have any evidence of where Borough residents work? E.g. Leicester City, other surrounding authorities, London? Would be helpful to know for baseline evidence.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently undertaking evidence gathering in terms of housing and economic need at a strategic and local level and the findings of these studies will also inform policies related to economic needs, including Employment.</p>

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		<p>C) Given that only just over half the current allocation has proceeded – and that very slowly – may be wise to focus on the specifics of this Borough, rather than the HENA? Isn't evidence of actual demand perhaps more important rather than whatever HENA modelling might predict?</p> <p>D) Concentrate adjacent to existing areas of employment use: there's likely to be space for re-provisioning, given many of the changes exemplified above.</p> <p>E) Can see the aim of minimising traffic increase from new housing, but people work where they can find it – not just because there's some local space. Adding employment space into new developments reduces the housing quota, increases the urban sprawl, and may even increase traffic if people travel from elsewhere rather than the adjacent new housing. Bad enough that all the call for sites are greenfield without trying to create mini Eco-towns.</p>	
Local Residents	25 <sup>th</sup> October 2021	<p><b>Employment Areas</b></p> <p>Yes assess whether current categorisations are accurate and up-to-date. Yes, designate identified areas, and up-date the criteria re the above evidence and any available data on changes in employment patterns in the Borough and surrounding areas.</p>	Noted.
Local Residents	25 <sup>th</sup> October 2021	<p><b>Part 05 Economy (Strategic Challenges)</b></p>	Noted.

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		<p><b>Retail Hierarchy</b></p> <p>1. Is it up to date and relevant, or does it need amending?</p> <p>A) May need to make more of the final sentence in the current Local Plan Hierarchy re 'retain and identify new small scale local shopping opportunities to meet the everyday needs of the local people.' There's a risk of underestimating how much single shops in residential settings can contribute to limiting car journeys - with attendant contribution to limiting emissions. e.g. Sainsbury's on Newton Lane, One Stop Shop on Aylestone Lane.</p> <p>B) Need to actively build in recognition of contribution of petrol stations with shops attached. E.g. On Saffron Rd./Blaby Rd, and Dorset Avenue in South Wigston. Will such sites be needed on the margins of any new development?</p> <p>C) Whilst there are significant limitations in trying to 'plan' employment in new developments, there is definitely a need to consider planning for small scale local shopping in new developments. The prospect of expanding the Borough's boundaries into yet more greenfield sites is bad enough. It would be made even worse if there were no attention given to local small scale shopping to minimise unnecessary car journeys for day-to-day basics. Nationally, shopping patterns have moved towards more frequent, smaller shopping anyway. That needs to be reflected in any plans for new housing developments – especially where the new housing is more</p>	<p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently undertaking evidence gathering in terms of housing and economic need at a strategic and local level and the findings of these studies will also inform policies related to economic needs, including Retail.</p>



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		<p>numerous, and the adjoining established housing may not have small shop provision already.</p> <p>2. Designation of the 3 town centres;</p> <p>All 3 town centres suffer from decline, as nationally. South Wigston has been badly hit by Tesco and is in worse decline than the other 2 centres. In addition to changes in shopping patterns nationally, South Wigston has higher incidence of local deprivation, and suffers from Blaby Rd being a major trunk route with appalling traffic issues. Neither of the other 2 centres have such bad through-traffic problems. Oadby has always had a few more 'prestigious' shops than the other 2 centres – but I think the Council is wary of putting it as the 'main' centre. That may be partly due to apparent enmity from some residents of the other 2 centres who've seen historical funding as favouring Oadby. As a result, these designations are a political/PR issue as much as an economic one – you can't say that in the Plan, but it's a huge influence on what gets decided.</p>	
Local Residents	25 <sup>th</sup> October 2021	<p><b>Retail Need</b></p> <p>A) Probably sensible to maintain town and district first approach – but needs to be more explicit in looking at small local shops, (and possibly petrol stations with shops attached) re comments on hierarchy.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently undertaking evidence gathering in terms of housing and economic need at a strategic and local level and the findings of these</p>

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		<p>B) Concentrating on just one of the 3 centres would be disastrous re increased journeys, climate change and sustainability issues – as well as a PR disaster!</p> <p>C) Yes, look at innovative potential mix of use to alleviate effects of empty shops – but needs clear strong planning principles on uses which would be considered, and those which would not, due to possible detrimental effects on either increased traffic, or nuisance to nearby residents.</p>	<p>studies will also inform policies related to economic needs, including Retail.</p>
Local Residents	25 <sup>th</sup> October 2021	<p><b>Town Centres and their boundaries</b></p> <p>Yes, keep the boundaries tight – but with the flexibility to enable the cited quality housing – especially for young families.</p>	Noted.
Local Residents	25 <sup>th</sup> October 2021	<p><b>Local Centres</b></p> <p>Yes, keep the designation! They are essential to minimise unnecessary journeys and contribute to the aim to reduce emissions. Weird that the NPPF doesn't even include them in their thinking, yet the major supermarkets have moved in to provide single small outlets across the whole country. Pity that small independents have been pushed out, but neighbourhoods use and appreciate small, local shops. Such outlets need formal designation and protection in the plan – not least to minimise unnecessary journeys and reflect changes in shopping patterns.</p>	Noted.
Local	25 <sup>th</sup> October	<b>Part 06 Green Infrastructure (Strategic Challenges)</b>	Noted.

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Residents	2021	<p>Yes keep the current Local Plan Policy Position relating to Green Infrastructure – BUT the wording amendments need to correct the following incoherence re <b>Local Green Spaces</b>:</p> <p>Wording: The current Local Plan is illogical as Local Green Spaces are not included in para 5.5.4. They are ‘mentioned’ alongside ‘other parts’ of Green infrastructure in para 5.5.5. Yet, there is a specific section in Chapter Ten on Protected Places dealing with Local Green Space protections (Policy 45) – just as for Green Wedges (Policy 42) and Countryside (Policy 43). Local Green Spaces are not just another ‘part’ of Green Infrastructure – and the Council’s own Policies make this clear – so they must be included in the Green Infrastructure specific definition. We’ve argued this with the Dept. before: it needs rectifying in the new Plan so there is proper coherence to Protected Places policies.</p>	
Local Residents	25 <sup>th</sup> October 2021	<p><b>Green Wedges</b></p> <p>1. Yes, roll forward the current Policy. The principles and reasoning stand and have been endorsed by the Inspectorate very recently. Don’t take any more boards out of your raft – it’s floating.</p> <p>2. NO! If you undertake a review to ‘take account’ of proposed sites, that’s already rolling over to developer pressure. You’ll consult for the review and receive lots of</p>	<p>Noted.</p> <p>The Council will review all existing designations, including Green Wedges, as part of the emerging Local Plan.</p> <p>Therefore, this representation and the supporting submissions will be taken into account by the Council when reviewing the current Green Wedge Review.</p>

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		lawyer-backed submissions on why the Policy has to be watered down.	
Local Residents	25 <sup>th</sup> October 2021	<p><b>Countryside</b></p> <p>1. How can it be ‘paramount’ that the Countryside is protected, yet some forms of development may be required? That particular oxymoron has been threaded through every aspect of Government approach, backed by a rigged system to ensure Councils go along with it.</p> <p>2. Given that Catch 22 context – yes continue with existing criteria based approach – if it has effectively managed growth so far, if anything it needs to be strengthened.</p> <p>3. As to whether to allow more forms of development: No. To ‘expand the policy approach to allow more forms of development’ would be conceding half the battle even before any site allocation assessment begins.</p> <p>Re ‘Hierarchy’ of Green Infrastructure:</p> <p>As pointed out in the headline comments -the current consultation has downgraded Local Green Spaces into section 10 on Design and Character. Worse, it makes it a Local Challenge rather than a Strategic Challenge. So, despite having specific protections directly comparable to Green Wedges and the Countryside, Local Green Spaces are being treated as of lesser importance than Green Wedges and Countryside. Why? There needs to be a clear, cohesive</p>	<p>Noted.</p> <p>The Council will review all existing designations, including Countryside, as part of the emerging Local Plan.</p> <p>Therefore, this representation and the supporting submissions will be taken into account by the Council when reviewing the current Countryside Policy approach.</p>

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		statement of the Council intentions to protect all the environmental assets in one <b>Protected Places</b> chapter as in the headline comments at the top of this response.	
Local Residents	25 <sup>th</sup> October 2021	<p><b>Drainage and Surface Water</b></p> <p>Comment: para 4.32 mentions planting trees!: perhaps the only mention in the whole suite of documents. Ironic that it's in relation to drainage in new developments rather than environmental/habitat/climate change needs. See later comments re tree planting.</p> <p>Continue with existing policy approach.</p>	Noted.
Local Residents	25 <sup>th</sup> October 2021	<p><b>Flood risk</b></p> <p>Roll forward current policy approach – don't review. Why make work when the principles are sound, and so very recently endorsed by the Inspectorate anyway?</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p>
Local Residents	25 <sup>th</sup> October 2021	<p><b>07 Environment and Sustainability (Strategic Challenges)</b></p> <p><b>Habitats and Biodiversity</b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>

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		<p>1. Yes roll forward the current policy. Don't adopt any unnecessary work – least of all in pursuit of the chimera that there can be any gain from development.</p> <p>2. 'Ensuring' net gain is impossible – development cannot do anything other than destroy more natural habitats and cover yet more green space with bricks and tarmac. Natural England seem to have rolled over to developer and/or government pressure with whatever the biodiversity 'metric' claims – it cannot magically turn inevitable loss into a gain.</p> <p>3. BUT Council could include minimum requirements for green space and tree planting that are way more ambitious to redress the inevitable damage and loss. And, yes, it needs to be named: development means damage and loss to habitat, biodiversity, and climate change. See comments below re tree planting, maintenance and protection.</p>	<p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p> <p>With regards to the Policy approach on Geodiversity and Biodiversity, the Council is committed to working with Local Authorities in Leicester, Leicestershire and Rutland to develop up to date evidence and understanding of this complex and ever changing aspect of Plan making.</p>
Local Residents	25 <sup>th</sup> October 2021	<p><b>Climate Change</b></p> <p>1. Roll forward and update to take account of progress:</p> <ul style="list-style-type: none"> <li>• Stronger requirements for low carbon energy for all developments – using higher EU standards.</li> <li>• Minimum requirements for green space per hectare of development.</li> <li>• Minimum requirements for retention of mature trees and hedgerows – with TPO and hedgerow protection before proposed sites are assessed.</li> </ul>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p> <p>With regards to the Policy approach on Climate Change, as well as Geodiversity and Biodiversity,</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<ul style="list-style-type: none"> <li>• Minimum new tree planting per hectare of development – with built in TPOs and requirements for maintenance.</li> </ul> <p>2. Tree Policy for whole Borough with equal strategic status</p> <p>It could go under climate change, but would equally fit in a Protected Places chapter.</p> <p>1. We view it as essential that a Tree Strategy, as at present, isn't robust enough, and what is needed is <b>policy status</b>. In 2018 Adrian said he was wary of using the term policy because it then has enforcement issues. Good! That's what's needed. (se e.g. email to Michael Bennetto 20 May 2018 @20:20 from Tony Sumpter) Adrian also referred to any policy having to go through various processes, including councillor and public consultation. The current Tree Strategy did go through those consultations: but it was still 'downgraded' to a Strategy. That has to change.</p> <p>2. The current government has promised tree planting – SO: build on whatever spin they've put out. Policy must include</p> <ul style="list-style-type: none"> <li>• Budget</li> <li>• Targets for planting on Council-owned land</li> <li>• Specific Project and dedicated staff to work with businesses, schools, residents, and community groups to plant trees in the community, with TPO protection from the outset, and to educate more widely re the benefits of trees.</li> <li>• Specification of suitable species for sites – must include commitment for future by including larger species as</li> </ul>	<p>the Council is committed to develop up to date evidence and understanding of this complex and ever changing aspect of Plan making.</p> <p>With regards to the specific recommendations concerning the importance of trees, the Council recognises that the protection and enhancement of tree cover is increasingly important in the context of protecting the environment. Therefore, as a minimum, the Council already takes account of adopted local plan policies, relevant supplementary planning documents, and the most up-to-date legislation, government advice and recommendations (as issued through the NPPF and PPG).</p> <p>In addition to this, as the emerging new Local Plan continues to develop, the Council is committed to ensuring that development proposals provide positive environmental benefits; including promoting the benefits of trees throughout the Borough, and thus encouraging sustainable management of the Borough's trees and enhancing the quality of their tree cover.</p> <p>To achieve this, the Council will explore options to strengthen its local Policy position and approach with regards to trees.</p>

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		<p>appropriate, and taking account of species to be avoided as already at risk.</p> <ul style="list-style-type: none"> <li>• Policy and funding for audit and replacement of Council owned ageing trees/those affected by pests – e.g. ash and horse chestnut.</li> <li>• Significant strengthening of Dept knowledge and commitment re TPO system: to actually use the clear, strong powers provided by the legislation and the application/validation process, rather than accepting invalid applications for consideration, and/or approving applications in the absence of either evidence, or sound planning reasons.</li> <li>• Ensure the Legal Dept fully support Planning Dept. in a robust interpretation of the TPO legislation. The powers are there – they need to be used with confidence.</li> <li>• Replanting of felled TPO trees as high priority within the Enforcement Officers remit.</li> <li>• Policy to issue new TPOs where residents seek protection for their tree-scape, and/or potential future risks to mature trees are identified – such as applications for development in call for sites process.</li> </ul> <p>Tree Policy is a prime example of the urgent need to act now to redress the impact of climate change. But it needs funding, determination that it's a priority, and equal status with other Strategic policies. Otherwise it will go nowhere and just be 'words' like the 'Greening the Borough' strapline of the past 20 years, whilst mature trees are felled or pollarded for no good reason, and with NO replanting enforced – let alone recorded on the TPO. To quote Greta Thunberg "Blah, blah, blah".</p>	



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Local Residents	25 <sup>th</sup> October 2021	<p><b>08 Infrastructure (Strategic Challenges)</b></p> <p><b>Highways Capacity</b></p> <p>1. You've given a very clear overview of the problems the Borough faces, and the fact there's no power for O + W to do anything much about any of it. Yes, cooperate with other authorities, but it shouldn't always be to build more roads, or widen what's there: Look to Singapore. They've reached capacity, said so, and stopped all road building. You can't build out of the problem: it's been evidenced that building roads increases traffic.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Local Residents	25 <sup>th</sup> October 2021	<p><b>Infrastructure Need</b></p> <p>1. Para 4.15 is a wonderful example of the system being rigged towards developers and away from the public. The Council have to plan, and show they've factored in key issues. So growth options get "assessed" to see if there's any infrastructure challenges that would "prevent any of the potential sites coming forward should they be needed." All of this before any assessment of the sites. Yet the public is supposed to feel that it's a level playing field if they are unhappy about development proposals.</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p>

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		2. Of course require contributions – for all developments regardless of size. How is the ever diminishing public purse supposed to fund infrastructure otherwise? ‘Encouragement’ will merely be declined in favour of profit.	
Local Residents	25 <sup>th</sup> October 2021	<p><b>Sustainable Transport</b></p> <p>1. Yes, require on-site infrastructure and promote solutions to address congestion and air quality.</p> <p>2. Can’t find anything about traffic calming, or more focussed use of lower mandatory speed limits. Has to be in there if safer communities is going to mean anything at all.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Local Residents	25 <sup>th</sup> October 2021	<p><b>Developer Contributions</b></p> <p>1. Only allow development where there’s demonstrable capacity or certainty of delivery for schools - especially pre-school and primary - and health services. Otherwise the increased traffic will be even worse. Also applies re previous points about small local shops.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and</p>

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			<p>local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Local Residents	25 <sup>th</sup> October 2021	<p><b>Viability</b></p> <p>1. The NPPF on this is the ultimate in weasel words: what their para 4.32 it's actually saying is that the local authorities have to work through protracted viability plans to ensure future developer profit is possible, with no representation at all from the public or key environmental agencies. So the Council rightly cites the process as complex!</p> <p>2. So, response to the actual questions: 'Roll forward' whilst taking account of the requirement for a viability assessment. Reasons? As a team you know your plan inside out, and know how best to use it as the foundation for balancing competing interests. If you try to develop a new policy approach at the same time as undertaking the viability assessment you have a less solidly secure starting point - so it will be harder to withstand developer pressure to write the new policy as they want it. It's the practice increasingly in central government that vested interests are now (like America) helping to draft legislation. The same shift is now seeping ever deeper into Local Government policy writing. Resist what</p>	Noted.

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		you can by starting from a framework that's already endorsed by the Planning Inspector and gives you a stronger raft to stand on.	
Local Residents	25 <sup>th</sup> October 2021	<p><b>High Quality Communications</b></p> <p>1. Yes, require provision of fibre broadband infrastructure. Evidence? - Essential service for</p> <ul style="list-style-type: none"> <li>• almost universal requirement for residents to engage with government departments, local authorities, and financial services.</li> <li>• Increasing home working – especially since Covid</li> <li>• Direct provision of a range of public services including health and education – demonstrated clearly through Covid lockdowns, and continuing since at much higher levels than before.</li> </ul>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p>
Local Residents	25 <sup>th</sup> October 2021	<p><b>Education</b></p> <p>1. Yes, require all developments to make a contribution, regardless of size.</p> <p>2. Two main strategic issues not covered:</p> <ul style="list-style-type: none"> <li>• excessive traffic as 'parental choice' has, over time, dramatically weakened the link between a school and the local community – particularly for secondary schools. Maybe this factor also needs to have a higher profile in the sections on highways and transport?</li> </ul>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p>

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		<ul style="list-style-type: none"> <li>No mention of 20mph school-approach speed limits – again cuts across to Highways section, but needs more prominence.</li> </ul>	
Local Residents	25 <sup>th</sup> October 2021	<p><b>Walking and Cycling Infrastructure</b></p> <p>1. Draft a new Policy. It's an area where much more can and should be done, and previous plans haven't been anywhere near ambitious enough.</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p>
Local Residents	25 <sup>th</sup> October 2021	<p><b>Public Transport</b></p> <p>1. Draft a new policy. Again, it's an area where much more can and should be done. In our view Councillors have tended towards viewing the City, Highways, and the bus companies, as unpersuadable at best, and difficult at worst. Perhaps a positive approach and a few tangible options could be helpful, for example: some metropolitan elected mayors have taken buses back into authority control and work with surrounding Boroughs/Districts to improve provision, reduce costs, and reduce private car use. Might the City look at proposals? It should be win/win for all.</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p>
Local Residents	25 <sup>th</sup> October 2021	<p><b>09 Housing (Local Challenges)</b></p> <p>1. Sorry, but the Government is down a rabbit hole: top limit of £250k (and that @ 30% discount!) is not 'affordable' let alone as a 'first home'. Our language is being bastardised by such nonsense. The Housing Market is now additionally skewed by</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>

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		<p>banks and pension funds buying whole new-estates off-plan, as a rental property portfolio:</p> <p><a href="https://propertyindustryeye.com/lloyds-bank-set-to-buy-first-property-as-it-plans-to-become-a-private-landlord/">https://propertyindustryeye.com/lloyds-bank-set-to-buy-first-property-as-it-plans-to-become-a-private-landlord/</a></p> <p><a href="https://www.thetimes.co.uk/article/the-banks-beating-first-time-buyers-to-new-homes-flnshrfpx">https://www.thetimes.co.uk/article/the-banks-beating-first-time-buyers-to-new-homes-flnshrfpx</a></p> <p><a href="https://www.thisismoney.co.uk/money/markets/article-9908539/FT-Lloyds-Banking-Group-target-buy-50-000-properties-2030.html">https://www.thisismoney.co.uk/money/markets/article-9908539/FT-Lloyds-Banking-Group-target-buy-50-000-properties-2030.html</a></p> <p>Welcome to rentier world. SO.....</p> <p>2. Government legislation has actively opened the door for banks and pension funds to ‘invest’ in residential property. In the absence of legislation preventing multiple purchase of new build, hard to see how any policy the Council may have can counteract a system that is rigged against young people ever being able to afford to buy their ‘first home’.</p> <p>3. So overall?: yes, of course it’s important that the Council put in place the maximum help they can – but with a realistic view of what’s actually going on.</p> <p>4. Yes, increase the required discount to 50%. A top figure of £250k is ridiculous. The robust evidence for increasing the level of discount is in ONS stats: dramatic overall drop in home ownership in past decades; that drop greatest as you go down</p>	<p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>

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		<p>the age groups; growing gap between earnings and house prices and younger age groups more seriously affected; average house prices now at much higher multiples of median earnings. Local evidence would be comparing local data against national ONS figures including levels of deprivation, and low local median wages.</p> <p>5. Actually hard to tell whether 'First Homes' will be of genuine benefit to the local community, given the British obsession with ever increasing house prices, buy-to-let, and now banks and pension funds scooping up new build. Young people face a bleak future trapped in renting. The Council should use every power available to them to help young people, and shift the balance away from the enormous power of developers, and the financial institutions. Homes aren't homes for them – just source of yet more profit. And in the case of the rentier shift – a never ending income stream. So do what you can.</p>	
Local Residents	25 <sup>th</sup> October 2021	<p><b>Technical Standards</b></p> <p>Looks like the Council has no choice but to comply with Govt standards. However, important to recognise that UK space standards are worse, and in some cases a lot worse, than 14 other European countries:</p> <p><a href="https://www.researchgate.net/figure/Comparison-of-selected-European-dwelling-sizes_tbl1_265377480">https://www.researchgate.net/figure/Comparison-of-selected-European-dwelling-sizes_tbl1_265377480</a></p>	Noted.
Local Residents	25 <sup>th</sup> October 2021	<b>Sustainable Homes</b>	Noted.

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		<p>1. You've given an excellent list of expectations in Paras 4.21, 4.22, and 4.23. So: <b>require all</b> new homes to have <b>all</b> the bullet list elements, plus the issues in paras 4.22 and 4.23 as <b>requirements</b>, not expectations. The planet doesn't have time for messing around with hoping developers will 'do the right thing'. They won't unless they have to.</p> <p>2. Key requirements missed from the bullet list: minimum standards of tree planting (with TPOs) and communal green open space, with funded maintenance agreements, relative to size of development.</p> <p>3. Research ways of limiting use of hard standing within requirements.</p>	
Local Residents	25 <sup>th</sup> October 2021	<p><b>Housing Choices</b></p> <p>Strengthen the Policy approach if possible – although prediction of varied needs of different groups and defining the 'right' kind of facilities is a difficult challenge.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take</p>



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			shape.
Local Residents	25 <sup>th</sup> October 2021	<p><b>Urban Infill</b></p> <p>Strengthen the policy approach to manage detrimental development, including removing the ‘in principle’ support for infill. Brownfield sites can be important for biodiversity, so there has to be audit of any site rather than a presumption in favour of development.</p> <p><a href="https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4264926/">https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4264926/</a></p> <p><a href="https://www.groundsure.com/resources/brownfield-sites-a-wildlife-haven/">https://www.groundsure.com/resources/brownfield-sites-a-wildlife-haven/</a></p> <p><a href="https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4264926/">https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4264926/</a></p> <p><a href="https://www.wildlifetrusts.org/habitats/towns-and-gardens/brownfield">https://www.wildlifetrusts.org/habitats/towns-and-gardens/brownfield</a></p>	Noted.
Local Residents	25 <sup>th</sup> October 2021	<p><b>10 Design and Character (Local Challenges)</b></p> <p><b>High Quality design</b></p> <p>1. Good design should partly depend on the setting. E.g. in a conservation area, key principle is that development should be in keeping with the architectural and spatial character. In a new development, it can mean more interesting designs than the ubiquitous off-plan boxes e.g. look at the interesting and attractive new infill houses on the eastern side of Saffron</p>	<p>Noted.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the Plan with regards to the inclusion of</p>

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		<p>Road, near Pork pie roundabout. In all cases, good design should:</p> <ul style="list-style-type: none"> <li>• Require maximum possible open space</li> <li>• keep and protect all mature trees and hedgerows</li> <li>• require planting of new trees and shrubs with funded maintenance built into the agreement</li> <li>• require the sustainability elements set out in section 9 paras 4.21-4.23.</li> </ul> <p>So, using those fundamental principles....</p> <p>2. Makes sense to produce a criteria based policy with locally specific design guides. Although important not to close down the opportunity for innovative design such as cited on Saffron Road, above. Also worth looking at cheaper, modular homes. Good examples are numerous. E.g. Oxford has a council owned social enterprise that builds modular homes: <a href="https://www.hug.group">https://www.hug.group</a> Or, completely different, small indoor modular 'homes' in an empty warehouse: <a href="https://www.itv.com/news/central/2021-02-18/former-stoke-city-manager-adapts-homeless-shelter-with-covid-safe-pods">https://www.itv.com/news/central/2021-02-18/former-stoke-city-manager-adapts-homeless-shelter-with-covid-safe-pods</a></p>	<p>local design guide production and/or codes within the emerging Plan has been noted and will be considered accordingly.</p>
Local Residents	25 <sup>th</sup> October 2021	<p><b>Construction and Use of Materials</b></p> <p>Yes, of course require the highest levels possible. OK, hard to achieve and likely to be downgraded to 'encourage' by an Inspector. So:</p>	Noted.

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		<ul style="list-style-type: none"> <li>• wrap it in tightly with the required climate change and sustainability targets so it can't be unravelled</li> <li>• have a policy that outline plans <b>have to</b> include sufficient detail on construction and use of materials to ensure the i's are dotted and t's crossed early enough in the process that developers can't downgrade at full plans stage</li> <li>• Have an evidenced case for the viability assessment process demonstrating how the highest levels of construction and materials improves the viability of a scheme in financial terms.</li> <li>• It'll always be the bottom line that's used to avert requirement and enforcement: so get good evidence from architects, engineers, and economists that are committed to making the case that benefit for the environment, sustainability, and character of good places to live, is also good for the bottom line as well.</li> </ul>	
Local Residents	25 <sup>th</sup> October 2021	<p><b>Landscape and Character</b></p> <p>Yes: roll forward and update current policy. BUT, as cited on pages 1-2 of this consultation response, this needs to be in a chapter for <b>Protected Places</b>. It doesn't fit here at all, and is a strategic challenge not a local challenge.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The specific recommendations will be taken into consideration accordingly as the emerging the new Local Plan progresses.</p>
Local Residents	25 <sup>th</sup> October 2021	<p><b>Local Green Spaces</b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations,</p>

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		<p>Again, as cited on pages 1-2 of this consultation response, this needs to be in a chapter for <b>Protected Places</b>. It doesn't fit here at all, and is a <b>strategic challenge</b> not a local challenge.</p> <p>We understand that the department is aware that the questions incorrectly refer to Local Plan Policy 44, instead of Policy 45 – Local Green Spaces.</p> <p>1. Yes, roll the current Policy 45 forward, and strengthen it if you can.</p> <p>2. No: the sites have been designated as meeting NPPF criteria literally 2 years ago, when the 2019-2031 Local Plan was endorsed by the Inspectorate. About the only thing that has changed in that time is that these spaces have been even more important for outdoor exercise during Covid restrictions. We note that the NPPF wording is slightly different in this July '21 amendment and that the department is required to 'review' the areas designated as Local Green Space as part of updating the Local Plan. This is inevitably of concern as pressure grows for yet more development. It's unclear what evidence residents may have to provide to demonstrate that the designated spaces continue to meet the NPPF criteria. Vast evidence has been provided with the aim of protecting the Local Green Spaces in South Wigston for over 20 years. The Council should do all they can to ensure that it isn't an onerous task for residents to yet again compile evidence that the areas are valued by the community and should be protected.</p>	<p>policy and guidance.</p> <p>The Council will review all existing designations and associated evidence, including that for the current Local Green Spaces.</p> <p>The specific recommendations will be taken into consideration accordingly as the emerging the new Local Plan progresses.</p>

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		A single, cohesive chapter of <b>Protected Places</b> will help to show Council commitment to protection of all the various features set out in the current 2019-2031 Local Plan, Chapter 10 – with Local Green Space, Landscape and Character, Green Wedges, and Countryside all included.	
Local Residents	25 <sup>th</sup> October 2021	<p><b>Design Codes</b></p> <p>Really difficult question – mostly because many residents may view their area as having a particular character, even though non-residents might not see it! Possibly best to go for the third, less prescriptive option, as a set of overall codes, cross referenced to Conservation areas, Landscape Character Policy, and Local Green Spaces. Would be important to enhance the overall codes with additional codes for specified parts of the Borough, which don't have the protection of conservation status but are recognised as having a more individual character.</p>	<p>Noted.</p> <p>The Council is currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to design and character.</p> <p>The recommendation to review and consider the inclusion of a criteria-based Policy carefully is noted and will be given consideration in due course.</p>
Local Residents	25 <sup>th</sup> October 2021	<p><b>Renewable and low carbon energy production</b></p> <ol style="list-style-type: none"> <li>1. Option one seems to be the strongest.</li> <li>2. What's missing is requirement for retention of mature trees and hedgerows, and minimum open space and new tree-planting as cited in sections above. Needs to be added in.</li> </ol>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
			As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.
Local Residents	25 <sup>th</sup> October 2021	<p><b>Public Realm</b></p> <p>1. The main question is whether the Supplementary Planning Document is as strong when it comes to whether development proposals can be required to be compliant. From the outline, it sounds as though a supplementary document isn't as strong as full Local Plan policies. So since option one seems to risk having to allow proposals that fail to reach the best possible public realm standards, it makes sense to incorporate more detailed policies from the Supplementary Planning Document into the main Local Plan. BUT with the following provisos:</p> <p>2. The Supplementary Public Realm Planning Document could be much stronger on the soft environment of green spaces, tree and shrub planting, and those areas of the Borough which are outside the three centres.</p> <ul style="list-style-type: none"> <li>• Para 5.7 – why are Local Green Spaces not listed? They should be. Shouldn't need pointing out after all this time and work.</li> <li>• We sent an email to Jamie on 3 Feb 2021 in response to the Public Realm consultation. Our comments then still stand. Do please look again at the detail behind the key points we made, namely:</li> </ul>	<p>Noted.</p> <p>The Council is currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to design and character, including public realm.</p>

**Appendix A: Representations received during the Regulation 18A Issues and Options Local Plan Public Consultation 2021 (with Officer Responses)**

Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<ul style="list-style-type: none"> <li>- Absence of any strategy to improve the public realm of residential areas by focussing on Town Centres. Need for simple improvements to the large residential areas where people spend most of their time. Please look at the detail in our Feb email.</li> <li>- Majority focus on hard surfaces and street furniture: huge lost opportunity to focus on small green spaces, shrub and tree planting, and creating small outdoor attractive meeting places.</li> <li>- Minimal attention to cycling</li> </ul>	
Local Residents	25 <sup>th</sup> October 2021	<p><b>Shop Fronts</b></p> <p>Yes, roll forward and update - if it's worked, keep it.</p>	Noted.
Local Residents	25 <sup>th</sup> October 2021	<p><b>11 Economy, Retail and Leisure (Local Challenges)</b></p> <p><b>Cafes, restaurants etc</b></p> <p>Oh but those first two paragraphs are testament to just what an impossible job you have. I know you're used to it, but honestly, the notion that Council's can be both up to date and have the full panoply of consultation ..... Emperor's New Clothes or what?</p> <p>Anyway. Your questions:</p>	<p>Noted.</p> <p>With regards to the specifics around the role of health impact assessment and also the number and location of takeaways, the Council has already begun to work proactively with Public Health on this matter and welcomes the opportunity to continue doing so.</p> <p>Sufficient on-street recycling and waste facilities may also be usefully be considered as part of the Council's approach to enhancing Public Realm in and around new development, as well as existing</p>

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		Yes, continue to protect the community and control hot food take-aways in whatever way you can – night time use, noise, litter and more intrusive disturbance can be disastrous for surrounding residents.	centres and areas where people congregate.
Local Residents	25 <sup>th</sup> October 2021	<p><b>Delivering Retail</b></p> <p>1. Presumably the retail capacity hasn't, as yet, changed that much since 2016. Plus a new study will cost in diminishing budgets. In the face of PDR it's usage that's the main challenge, surely, rather than capacity?</p> <p>2. With the PDR it sounds like you're now being expected to skip with your hands and ankles tied, in the face of a 70 degree gale force wind of recent rapid change (Covid, online, business failures), whilst supposedly being 'ahead' of whatever marbles are being rolled towards you. Go with whatever you can from the NPPF, "support town centres and take a positive role in their growth, management, and adaptation." And yes, it probably does mean enough flexibility to adapt to uncertainty, whilst holding to as many of the principles that protect the surrounding community as possible! Humph. Juggling whilst skipping.....</p> <p>3. Stick to the current proportionate limits if you can.</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The retailing and leisure sector and the changes to the Use Classes Order (and how this is changing the role of retail centres) will be considered accordingly moving forwards.</p>
Local Residents	25 <sup>th</sup> October 2021	<b>Local Impact thresholds</b>	Noted.



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		Yes, maintain the thresholds on the current sound reasoning. No need for update study – the centres are still too compact for larger thresholds to apply!	
Local Residents	25 <sup>th</sup> October 2021	<p><b>Primary and Secondary frontages</b></p> <p>Perfect example of catch 22 where PDR clashes straight into the carefully set Policy 27 permitted uses. Your questions come the closest to a quiet scream of “What the hell are we supposed to do now?’ that I’ve ever seen from your good selves. Presumably, your view on trying to have a potential buffer means you think it might (just possibly, give or take the next crisis ridden government output) give some element of control. In which case – yes, all buffers will be welcome. Your admirably calm “should we adopt a local policy approach?” to cope with “further unexpected changes” deserves full honours – followed by home early, and whatever comfort wind-down of your choice.</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The retailing and leisure sector and the changes to the Use Classes Order (and how this is changing the role of retail centres) will be considered accordingly moving forwards.</p>
Local Residents	25 <sup>th</sup> October 2021	<p><b>Tourism</b></p> <p>Honestly can’t believe tourism is a genuine prospect for the Borough economy – so cut your losses and just use the generic NPPF.</p>	Noted.
Local Residents	25 <sup>th</sup> October 2021	<b>12 Health and Well Being (Local Challenges)</b>	Noted.

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		<p><b>Open Space, sport and recreation facilities</b></p> <p>Yes, roll forward with relevant update. Not sure its worth the time and cost of reviewing evidence base – only 2 years since last Plan agreed.</p>	
Local Residents	25 <sup>th</sup> October 2021	<p><b>Built Leisure Facilities</b></p> <p>Apply national guidance – only assess whether there’s increased demand if time/cost pressures allow for the work involved. Important to remember that Sport England is actually a lobby group in favour of maximising sporting facilities – so need to query whether they are an objective partner for “assessing’ demand.</p>	Noted.
Local Residents	25 <sup>th</sup> October 2021	<p><b>Built Health Facilities</b></p> <p>Can’t possibly answer this without being explicit about impact of more than 10 years of serious underfunding of NHS. Average patient numbers per GP – over 2, 500 and rising: in the EU it’s around 300. Doctor to population ratio here is worse than any other EU nation apart from Poland. Now 0.45 GPs per 100k patients, compared to 0.52 in 2015. Average patient list size increased from 6,914 patients in 2013 to 8,757 in Oct 2019. <b>That translates as enormous pressure for increased services</b> at the very time when there’s dramatic decrease in GP numbers and increase in surgery closures. In addition, historically, developers have rarely been held to providing appropriate levels of funding for either education or health service pressures as a result of new build. It’s time that</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p>

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		<p>was redressed. BUT biggest problem is that the provision is increasingly likely to be from private health providers – and many, many people will not be able to access it because of cost. So... <b>the council needs to do all it can to ensure that any developer funds for health facilities is for public free-at-the-point-of use services, not private provision.</b> This Borough has a high level of deprivation – so planning has to act to redress inequities wherever it can.</p>	
Local Residents	25 <sup>th</sup> October 2021	<p><b>Health Impact Assessments</b></p> <p>Yes Roll forward and update.</p>	Noted.
Local Residents	25 <sup>th</sup> October 2021	<p><b>13 Local Services (Local Challenges)</b></p> <p><b>Car parking and electric vehicles</b></p> <p>Yes, roll forward policy. Maximise requirements on developers re charging provision.</p>	Noted.
Local Residents	25 <sup>th</sup> October 2021	<p><b>Community facilities</b></p> <p>Yes, roll forward, and yes require developer contribution, regardless of size. Have you seen developer profits? And that's only what's declared after the huge companies have been broken into multiple smaller companies for' tax purposes'.</p>	Noted.
Local Residents	25 <sup>th</sup> October 2021	<p><b>Cemetery and burial space</b></p>	Noted.

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		Don't know the specifics of Oadby cemetery. Presumably rolling forward would be reasonable given how recently the current plan was agreed.	
Local Residents	25 <sup>th</sup> October 2021	<p><b>14 Heritage (Local Challenges)</b></p> <p><b>Conservation Areas</b></p> <p>Keep protecting and leave the current areas in place.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The specific recommendations will be taken into consideration accordingly as the emerging the new Local Plan progresses.</p>
Local Residents	25 <sup>th</sup> October 2021	<p><b>Listed Buildings and locally listed buildings</b></p> <p>Yes, roll policy forward. Re Schedule of Locally Listed Buildings – only know the South Wigston area – and several architecturally interesting buildings were left out of the listing by whoever compiled it. Would suggest review would be helpful if time/costs allow – but maybe ask a number of local groups rather than one person to maximise local interest rather than personal taste.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The specific recommendations will be taken into consideration accordingly as the emerging the new Local Plan progresses.</p>
Local Residents	25 <sup>th</sup> October 2021	<p><b>15 Masterplanning (Local Challenges)</b></p> <p>Maintain current policy, updated. May be worth avoiding defining 'large scale' – maybe a floor, rather than a definition? Being less specific could give greater flexibility to maintain some control. Masterplans and development briefs give</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>

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		<p>thinking time for the essential planning, and a good template to set the agenda for what will/will not be viewed as of potential benefit to the community. Hold onto doing them if you can.</p> <p>As to the principles of place making: it's all the stuff you manage to get enshrined in the plan anyway re protection at best, mitigation at worst, and ensuring contributions to wider needs re climate, local services, and what makes a 'good' place to live.</p>	<p>The specific recommendations will be taken into consideration accordingly as the emerging the new Local Plan progresses.</p>
Local Residents	25 <sup>th</sup> October 2021	<p><b>16 Scoping Report – Sustainability Appraisal</b></p> <p>We note that in Table 8, the wording of objective 8 is a good strong statement. In the 2015 SA, that wording was lost – please hold onto it this time. (You may remember we disputed that 'natural environment' became biodiversity and geodiversity – or you may have purged it from your memory!)</p> <p>Sadly, the suggested indicators read as somewhat negative as they are mostly about tracking the loss of green spaces and biodiversity. There seems to be an underlying assumption that there will be new development in the Green Wedges and Countryside. Counting such development isn't 'protecting' – least of all with no percentage comparison against whatever is 'left' of the relevant green space. Whilst development in 'protected places' does need monitoring, there need to be some strong positive objectives tracking more tangible protection of green assets.</p>	<p>Noted.</p> <p>The Local Plan's Sustainability Appraisal must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The specific recommendations to improve and strengthen the relevant aspects of the Sustainability Appraisal element of the Local Plan preparation have been noted and will be considered accordingly.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<ul style="list-style-type: none"> <li>• At the very least surely there needs to be some limit established beyond which no further development will be allowed? Would be good to count a) %age of call for sites proposals that fail the assessment, and b) percentage of development applications successfully refused as failing to meet agreed Local Plan Policies which are aimed at “<b>helping to tackle climate change and protecting those areas that most need it.</b>”</li> <li>• Monitoring only regionally identified green assets leaves most of the Borough at risk in not reaching the high bar required re SSSI or BAP habitat.</li> <li>• Local Green Spaces not mentioned – they should be.</li> <li>• Whilst it’s good that TPOs are being included, the choice of ‘<i>number of trees with TPOs in place</i>’ means nothing on its own. What’s the baseline? Do the Council even know how many TPOs are in place now? Let alone whether the specified trees are still there. At minimum, there needs to be monitoring of: <ul style="list-style-type: none"> <li>- new TPOs, and hedgerow protection, issued on land identified in call for sites, prior to assessment process</li> <li>- percentage of retained mature trees and hedgerows on proposed development sites.</li> <li>- new planting of TPO trees with funded maintenance in new development</li> <li>- percentage communal green space with funded maintenance in new development</li> <li>- % age successful, recorded replacement of TPO trees which have been approved for felling through the usual application process</li> </ul> </li> </ul>	

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		<p>It's impossible to move from a net loss of biodiversity to achieving gains for the natural environment by pursuing development. It rides rough shod over all that's known about ecology. This is where NPPF priorities speak with forked tongue: biodiversity, the natural environment, and habitats, can only be damaged and diminished by building stuff. ....Your work and this plan are the only things that stand up for the Borough's local natural environment for the next 20 years. So we need you to be as robust as possible. Push the boundaries.</p>	
Local Resident, Public Consultation Event at Wigston Leisure Centre	16 <sup>th</sup> September 2021	<p><b>Community Facilities</b></p> <p>It would be good if derelict building could be utilised for the benefit of communities.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event at Wigston Leisure Centre	16 <sup>th</sup> September 2021	<p><b>Parks and Open Spaces</b></p> <p>More dog waste bins are needed on the streets around South Wigston to encourage dog owners to clean up after their dogs as dog mess is an issue and a health and safety hazard – especially for young children and the elderly.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident,	16 <sup>th</sup> September	<p><b>Highway Safety</b></p>	<p>Noted.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Public Consultation Event at Wigston Leisure Centre	2021	On-street car parking around South Wigston causes major issues. It leads to congestion on the roads – sometimes emergency vehicles might struggle to get past. Also, cars parking up on pavements can make it difficult for pushchairs and mobility scooters to pass.	Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.
Local Resident, Public Consultation Event at Wigston Leisure Centre	16 <sup>th</sup> September 2021	<p><b>Healthcare</b></p> <p>The doctor’s surgery provision is inadequate – it’s impossible to get an appointment.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event at Wigston Leisure Centre	16 <sup>th</sup> September 2021	<p><b>Flood Risk</b></p> <p>The bridge road at Crow Mills is always flooding – something needs to be done. The road is dangerous to motorists and pedestrians when flash floods occur.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event at Wigston Leisure Centre	16 <sup>th</sup> September 2021	<p><b>Community Facilities</b></p> <p>There are not enough community centres in the area</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>



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Local Resident, Public Consultation Event at Wigston Leisure Centre	16 <sup>th</sup> September 2021	<p><b>Public Transport</b></p> <p>The bus service between Oadby and Wigston is poor.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event at Wigston Leisure Centre	16 <sup>th</sup> September 2021	<p><b>Highway Safety</b></p> <p>A resident who lives at Bushloe End said that the roundabout at the top of Launceston Road is extremely dangerous. There are also lots of cars parked on the pavement in this area, which causes further problems.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event at Wigston Leisure Centre	16 <sup>th</sup> September 2021	<p><b>Highway Safety</b></p> <p>Congestion along Blaby Road and Station Road can be very bad, which can be exacerbated by the traffic signalling. The traffic signalling needs to be addressed in order to ease the traffic flow.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event at Wigston	16 <sup>th</sup> September 2021	<p><b>Public Transport</b></p> <p>The bus services are adequate.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>

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Leisure Centre			
Local Resident, Public Consultation Event at Wigston Leisure Centre	16 <sup>th</sup> September 2021	<p><b>Highway Safety and Congestion</b></p> <p>Not enough roads to cope with the amount of cars on the road as congestion is a major issue throughout the Borough.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event at Wigston Leisure Centre	16 <sup>th</sup> September 2021	<p><b>Transport</b></p> <p>There are not enough incentives to encourage people to make less car journeys.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event at Wigston Leisure Centre	16 <sup>th</sup> September 2021	<p><b>Residential Design and Infrastructure</b></p> <p>Flats and apartments generally do not provide adequate parking provision to meet people's needs.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation	16 <sup>th</sup> September 2021	<p><b>Highway Safety</b></p> <p>The roundabout where Wakes Road and Bull Head St cross (McDonalds). Tailbacks are caused as cars try to enter / exit</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your</p>

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Event at Wigston Leisure Centre		McDonalds and the pedestrian crossing. Lights need reconfiguring.	comments. These will be taken into consideration accordingly.
Local Resident, Public Consultation Event at Wigston Leisure Centre	16 <sup>th</sup> September 2021	<b>Infrastructure</b> New housing development needs to take account of the congestion – developers need to provide the infrastructure to support the people and cars that will be using the roads, schools, doctors surgeries etc.	Noted. Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.
Local Resident, Public Consultation Event at Wigston Leisure Centre	16 <sup>th</sup> September 2021	<b>Leisure</b> The Leisure centres in the Borough are of an excellent standard, providing good quality leisure facilities. You can always get on the equipment.	Noted. Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.
Local Resident, Public Consultation Event at Wigston Leisure Centre	16 <sup>th</sup> September 2021	<b>Retail</b> We appreciate the town centres in the Borough and visit Oadby for shopping. There are lots of coffee shops and charity shops but “something is better than nothing” and going into Leicester city “is a nightmare”.	Noted. Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.
Local Resident,	16 <sup>th</sup> September	<b>Healthcare</b>	Noted.

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Public Consultation Event at Wigston Leisure Centre	2021	It's very difficult to get an appointment with the GP surgery now.	Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.
Local Resident, Public Consultation Event on Oadby Parade	24 <sup>th</sup> September 2021	<p><b>Housing Choice, Adaptability and Affordability</b></p> <p>Housing for people with disabilities is a real issue here in the Borough. I have a disabled daughter and am looking for a bungalow but cannot find one that is affordable here in Oadby or where I live in Wigston.</p> <p>Housing for the elderly and for the younger generations is also a struggle.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event on Oadby Parade	24 <sup>th</sup> September 2021	<p><b>Open Spaces and Heritage</b></p> <p>It's important to conserve Brocks Hill, our open spaces and our heritage to keep the Borough attractive.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event on Oadby Parade	24 <sup>th</sup> September 2021	<p><b>Town Centres</b></p> <p>It's important to keep local businesses trading in the town centres.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>

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Local Resident, Public Consultation Event on Oadby Parade	24 <sup>th</sup> September 2021	<p><b>Town Centres</b></p> <p>More flexibility in the uses of buildings should be allowed and the percentage requirement for retail use on the high street should be lowered as there has been no development on East Street and there are too many vacant units. WE need to entice people into the centre of Oadby and more residential would help to achieve this.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event on Oadby Parade	24 <sup>th</sup> September 2021	<p><b>Education - Infrastructure</b></p> <p>More school places are needed in Oadby. Two children have to go to Wigston to school and have been told there is a two year wait for a place.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event on Oadby Parade	24 <sup>th</sup> September 2021	<p><b>Housing Choices</b></p> <p>More bungalows are needed in Oadby.</p> <p><b>Residential Development</b></p> <p>The Council should develop Glen Gorse golf club next to Cottage Farm.</p> <p><b>Community Facilities</b></p> <p>The Council should not close community centres and have fewer, larger ones as joint use doesn't work.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>

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		<p><b>Infrastructure Delivery</b></p> <p>There is no point in smaller housing developments as they do not bring the investment and facilities that communities need (more school places or doctors surgeries).</p>	
<p>Local Resident, Public Consultation Event on Oadby Parade</p>	<p>24<sup>th</sup> September 2021</p>	<p><b>Infrastructure Delivery</b></p> <p>Need improvements to infrastructure and public transport. It needs to be more frequent and more reliable.</p> <p><b>Healthcare</b></p> <p>Joint GP surgeries are a great concept and should be encouraged and explored.</p> <p><b>Climate Change and Public Realm</b></p> <p>We need more trees in the streets.</p> <p><b>Design and Character</b></p> <p>There has been a massive increase in the demolition of existing properties and the rebuilding of homes that are out of character with the area.</p> <p><b>Town Centres</b></p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>

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		There are too many empty shops now – new businesses need attracting into Oadby town centre. However, there are too many charity shops.	
Local Resident, Public Consultation Event on Oadby Parade	24 <sup>th</sup> September 2021	<p><b>Community Facilities</b></p> <p>The council needs to protect parks and open spaces, such as Brocks Hill.</p> <p>Also, protect specialist community facilities as shared spaces do not work.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event on Oadby Parade	24 <sup>th</sup> September 2021	<p><b>Residential Design and Infrastructure</b></p> <p>New developments should include the planting of more trees. There should also be more parking provision in new developments and more for existing (i.e. more on street)</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event on Oadby Parade	24 <sup>th</sup> September 2021	<p><b>Public Realm</b></p> <p>There should be improvements to the public realm and more cycling provision.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation	24 <sup>th</sup> September 2021	<p><b>Education - Infrastructure</b></p> <p>There are not enough local school places for the children who live here.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your</p>

**Appendix A: Representations received during the Regulation 18A Issues and Options Local Plan Public Consultation 2021 (with Officer Responses)**

Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Event on Oadby Parade			comments. These will be taken into consideration accordingly.
Local Resident, Public Consultation Event on Oadby Parade	24 <sup>th</sup> September 2021	<p><b>Public Transport - Infrastructure</b></p> <p>Public transport is too expensive, the route coverage needs to be better and the services need to be more frequent.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event on Oadby Parade	24 <sup>th</sup> September 2021	<p><b>Infrastructure Delivery</b></p> <p>There should be support and encouragement for the provision of local shops, schools, doctor's surgeries, and community facilities when new development is planned or proposed.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event on Oadby Parade	24 <sup>th</sup> September 2021	<p><b>Safety of New Developments</b></p> <p>There should be particular attention paid to safety and the potential for crime in new housing developments where there tend to be less pedestrians on the streets.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event on Oadby Parade	24 <sup>th</sup> September 2021	<p><b>Town Centres</b></p> <p>There are too many vacant shops in the town centre. We need more independent shops attracted to fill the empty units.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>



**Appendix A: Representations received during the Regulation 18A Issues and Options Local Plan Public Consultation 2021 (with Officer Responses)**

Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Local Resident, Public Consultation Event on Bell Street, Wigston	8 <sup>th</sup> October 2021	<p><b>Public Realm</b></p> <p>The top of the waste-bin lid outside of Specsavers has been torn off by vandals.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event on Bell Street, Wigston	8 <sup>th</sup> October 2021	<p><b>Town Centres</b></p> <p>Concerned about the future of Wigston Town Centre – are there genuine plans to develop it?</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event on Bell Street, Wigston	8 <sup>th</sup> October 2021	<p><b>Residential Design and Infrastructure</b></p> <p>The management companies of new housing estates do not work with the residents (Barratts, for example). It can be very difficult to get any action. Pochin’s Bridge is a good example and the whole experience has been very frustrating. The developer’s should take their responsibilities and duties seriously.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event on Bell	8 <sup>th</sup> October 2021	<p><b>Town Centres</b></p> <p>Wigston Town Centre needs a draw. I’ve lived in Wigston since I was a kid and I want to support my town. There is</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration</p>

**Appendix A: Representations received during the Regulation 18A Issues and Options Local Plan Public Consultation 2021 (with Officer Responses)**

Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Street, Wigston		nothing here to attract people and that needs addressing or the town centre will die completely.	accordingly.
Local Resident, Public Consultation Event on Bell Street, Wigston	8 <sup>th</sup> October 2021	<p><b>Education - Infrastructure</b></p> <p>There is a lack of school places – children have to take buses further afield.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event on Bell Street, Wigston	8 <sup>th</sup> October 2021	<p><b>Town Centres</b></p> <p>Wigston Town Centre is unattractive and needs to be made more visually appealing.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event on Bell Street, Wigston	8 <sup>th</sup> October 2021	<p><b>Housing Choices</b></p> <p>There needs to be more living accommodation for the elderly. We do not have a retirement village within the Borough. Homes built for the elderly should be kept for them in perpetuity.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public	8 <sup>th</sup> October 2021	<p><b>Town Centres – Infrastructure</b></p>	<p>Noted.</p> <p>Thank you for attending the public consultation</p>

**Appendix A: Representations received during the Regulation 18A Issues and Options Local Plan Public Consultation 2021 (with Officer Responses)**

Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Consultation Event on Bell Street, Wigston		Public toilets are a key facility and should be provided in all town centres.	event and for taking the time to provide your comments. These will be taken into consideration accordingly.
Local Resident, Public Consultation Event on Bell Street, Wigston	8 <sup>th</sup> October 2021	<p><b>Town Centres</b></p> <p>Council presence is needed in the town centres – it’s a bad move to close the customer service centre in Bell Street. Lots of elderly and vulnerable people don’t have computers, the internet or have issues using the phone.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event on Bell Street, Wigston	8 <sup>th</sup> October 2021	<p><b>Housing Density</b></p> <p>We don’t need any more ‘density’ in terms of residential homes – it’s too dense already and there is so much congestion everywhere.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event on Bell Street, Wigston	8 <sup>th</sup> October 2021	<p><b>Heritage</b></p> <p>Is St. Wistan’s church mentioned in the Local Plan? It’s an important local asset and it needs protection and needs to have power.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local	8 <sup>th</sup> October	<b>Heritage</b>	Noted.

**Appendix A: Representations received during the Regulation 18A Issues and Options Local Plan Public Consultation 2021 (with Officer Responses)**

Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Resident, Public Consultation Event on Bell Street, Wigston	2021	Land at back of Cox's fruit shop should be protected in the Local Plan as a heritage asset.	Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.
Local Resident, Public Consultation Event on Bell Street, Wigston	8 <sup>th</sup> October 2021	<p><b>Highways</b></p> <p>The traffic speed down Bull Head Street is too fast. Speed camera placement needs looking at.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event on Bell Street, Wigston	8 <sup>th</sup> October 2021	<p><b>Town Centres</b></p> <p>Crime needs monitoring in the town centres – bins have been set on fire recently in Bell Street.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event on Bell Street, Wigston	8 <sup>th</sup> October 2021	<p><b>Community Facilities</b></p> <p>There is a real problem with loneliness in the community which was exposed during the pandemic lockdowns. This needs addressing and the council should take a lead in ensuring that there is awareness of community facilities and services that are open and running. The Age Concern coffee morning</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		closures were a real loss to those who relied on them for company. Also, the Kings Centre's future seems uncertain – is the Council buying it?	
Local Resident, Public Consultation Event at Parklands Leisure Centre, Oadby	12 <sup>th</sup> October 2021	<p><b>Electric Vehicle Charging Points - Infrastructure</b></p> <p>The car parking consultation notices are up here at Parklands leisure centre but nobody knows what is happening as nobody has been told. Where was the public consultation?</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event at Parklands Leisure Centre, Oadby	12 <sup>th</sup> October 2021	<p><b>Green Infrastructure</b></p> <p>We need policies in the Local Plan to protect biodiversity and green spaces in the Borough.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event at Parklands Leisure Centre, Oadby	12 <sup>th</sup> October 2021	<p><b>Highways</b></p> <p>The Welford Road development traffic lights are badly synchronised and have a bad impact on traffic. Guthlaxton Road also affected and traffic calming measures such as sleeping policemen and speed bumps are needed.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Local Resident, Public Consultation Event at Parklands Leisure Centre, Oadby	12 <sup>th</sup> October 2021	<p><b>Town Centres</b></p> <p>Car parking charges will kill Oadby town centre.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event at Parklands Leisure Centre, Oadby	12 <sup>th</sup> October 2021	<p><b>Residential Development</b></p> <p>Residents are not consulted adequately on developments. 1,000 houses on Newton Lane and no consultation – this is an “underhand” way of doing development and it’s too much.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event at Parklands Leisure Centre, Oadby	12 <sup>th</sup> October 2021	<p><b>Housing Choices</b></p> <p>There needs to be more bungalows within the Borough for when people want to downsize – e.g. when they are retired and their children have left home.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident,	12 <sup>th</sup> October 2021	<p><b>Housing Choices</b></p>	<p>Noted.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Public Consultation Event at Parklands Leisure Centre, Oadby		Do we need more flats in the Borough to cater for younger people and professionals? Development seems quite sporadic.	Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.
Local Resident, Public Consultation Event at Parklands Leisure Centre, Oadby	12 <sup>th</sup> October 2021	<p><b>Highways</b></p> <p>Parking outside schools is a problem and causes congestion. There are several schools within a short distance of each other in Oadby and it causes a real problem for residents and for the safety of pedestrians and other drivers with parents jockeying for spaces. Some of the parking is borderline illegal.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event at Parklands Leisure Centre, Oadby	12 <sup>th</sup> October 2021	<p><b>Community Facilities</b></p> <p>The Council should do more to help the homeless people within the Borough. Could there be a homeless hub that could provide food and support and coordinate other forms of practical and mental health support? These people are part of the community too.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event at	12 <sup>th</sup> October 2021	<p><b>Housing Choices</b></p> <p>The council should build more social housing.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration</p>

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Parklands Leisure Centre, Oadby			accordingly.
Local Resident, Public Consultation Event at Parklands Leisure Centre, Oadby	12 <sup>th</sup> October 2021	<p><b>Town Centres</b></p> <p>New parking restrictions: In regards to the 30 minutes allowed in the parking bays, it can be difficult for the elderly or disabled to complete their shopping within this time and it will likely cause them anxiety.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event at Parklands Leisure Centre, Oadby	12 <sup>th</sup> October 2021	<p><b>Infrastructure – Cycle Paths</b></p> <p>Existing cycle lanes need to be improved and there needs to be more of them.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event at Parklands Leisure Centre, Oadby	12 <sup>th</sup> October 2021	<p><b>Housing Choices</b></p> <p>There isn't any housing that is appropriate for people with complex needs, such as cerebral palsy. I couldn't find a suitable bungalow that was affordable and would cater to my daughter's needs within the Borough.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>



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Local Resident, Public Consultation Event at Parklands Leisure Centre, Oadby	12 <sup>th</sup> October 2021	<p><b>Infrastructure - Education</b></p> <p>There are too many houses being built but you can't guarantee that developers will build the schools to provide the extra school places that are needed as a result, even if this is agreed.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event at Parklands Leisure Centre, Oadby	12 <sup>th</sup> October 2021	<p><b>Landscape, Design, Character and Public Realm</b></p> <p>There are blocks of flats around the Borough that look really scruffy and are not well maintained and the shop facades have no character, unlike Market Harborough of Lutterworth which have a distinctive and attractive character. It's hard to be proud of our Borough in some places and there can be a lack of social and community cohesion.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident, Public Consultation Event at Parklands Leisure Centre, Oadby	12 <sup>th</sup> October 2021	<p><b>Leisure and Recreation</b></p> <p>When the car parking charges come into force I will cancel my Parklands membership and join the gym in Harborough instead.</p>	<p>Noted.</p> <p>Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.</p>
Local Resident,	12 <sup>th</sup> October 2021	<p><b>Highways</b></p>	<p>Noted.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Public Consultation Event at Parklands Leisure Centre, Oadby		The street lighting is switched off at night which is dangerous for pedestrians and street safety.	Thank you for attending the public consultation event and for taking the time to provide your comments. These will be taken into consideration accordingly.
Mather Jamie Ltd on behalf of Wheatcroft Properties Ltd	29 <sup>th</sup> October 2021	<p><b>OADBY AND WIGSTON LOCAL PLAN ISSUES AND OPTIONS CONSULTATION</b></p> <p>Thank you for the opportunity to comment on the Issues and Options version of the Oadby and Wigston Local Plan. These representations are made in relation to Wheatcroft Properties' interests in two parcels of land;</p> <ul style="list-style-type: none"> <li>• Land west of Welford Road, Wigston (3.59 ha);</li> <li>• Land north of Glen Gorse Golf Course (12.8 ha).</li> </ul> <p>Call for Sites forms have been completed for each site and are submitted alongside these representations. We would make the following comments on the Issues and Options document.</p>	<p>Noted.</p> <p>The Council would like to thank Mather Jamie Ltd for taking time to read through the consultation documents and for responding.</p> <p>All sites received to date via the Call for Sites process in 2020 and 2021 will be taken into account accordingly.</p>
Mather Jamie Ltd on behalf of Wheatcroft Properties Ltd	29 <sup>th</sup> October 2021	<p><b>OVERARCHING POLICY AREAS</b></p> <p><b>The Plan Period and Cooperation</b></p> <p>The Options document suggests a plan period up to 2041 that reflects the time period for strategic evidence being prepared</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>Local planning authorities in the Housing Market</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p>by the Leicester and Leicestershire HMA authorities. The suggested timeframe for the plan is supported.</p> <p>In terms of Statements of Common Ground, it would be appropriate leading up to the Examination in Public on the Plan for the Council to enter into Statements of Common Ground with key developer interests promoting sites selected for allocation.</p> <p>However, the most important Statement of Common Ground is the agreement of a Statement of Common Ground between the HMA authorities on the distribution of Leicester's unmet needs. This agreement is needed as a matter of urgency to enable local authorities to progress with the preparation of their plans.</p>	<p>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.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Mather Jamie Ltd on behalf of Wheatcroft Properties Ltd	29 <sup>th</sup> October 2021	<p><b>Where Should Development Go?</b></p> <p>Potential options identified in the consultation document include concentrating development within existing urban areas, focusing development towards greenfield sites or taking a balanced approach to new development with a mix of urban and greenfield development.</p> <p>It is clear that the Council will be unable to meet its future housing requirement solely on brownfield sites. The most appropriate strategy will be to plan for a mix of urban and greenfield sites of different sizes and locations to ensure that the housing requirement in the Borough is delivered over</p>	<p>Noted.</p> <p>All sites received to date via the Call for Sites process in 2020 and 2021 will be taken into account accordingly.</p> <p>The Council are currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing, including that related to the consideration and assessment of specific sites put forward for new growth opportunities.</p>

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		<p>the plan period. Greenfield site releases will be necessary as part of a portfolio of housing sites to deliver the housing requirement.</p> <p>Both land parcels in the ownership of Wheatcroft Properties offer the opportunity to provide additional housing to help meet future housing requirements in the Borough over the plan period.</p> <p>The land to the north of Glen Gorse Golf Course extends to some 12.8 ha and could provide between 280 and 370 dwellings. The site lies immediately to the south-west of the Cottage Farm Phase 2 housing allocation in the adopted Local Plan. It provides a logical extension to this allocated site. Whilst falling within an area of Green Wedge, development on the site would not threaten the overall form and function of the wider Green Wedge and would not result in a reduction in the area of separation between Oadby and Wigston.</p> <p>The land to the west of Welford Road extends to some 3.59 ha and could provide between 78 and 100 dwellings. The site lies to the south of the mainline railway and west of Kilby Bridge, with access available from Welford Road. The site offers the opportunity for residential development well related to the existing urban area of Wigston which forms part of the Leicester PUA.</p>	<p>As part of this work, the Council has already and will continue to seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions will continue to take shape.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>The Council will also undertake evidence gathering in terms of infrastructure and transport at a strategic and local level and the findings of these studies (and all evidence base) will inform policies related to housing and new development, including that related to the consideration and assessment of specific sites put forward for new growth opportunities.</p> <p>As part of this work, the Council has already begun and will continue to regularly engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions will continue to take shape.</p>
Mather Jamie Ltd on behalf	29 <sup>th</sup> October 2021	<b>HOUSING</b>	Noted.

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
of Wheatcroft Properties Ltd		<p><b>Housing Need</b></p> <p>The Issues and Options consultation outlines options for calculating housing needs for the plan period, including continuing to use the current housing requirement of 148 dwellings a year, applying the standard method figure of 180 dwellings a year or using outputs from the Housing and Employment Needs Assessment.</p> <p>The NPPF and Planning Practice Guidance are clear that 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 and 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, unless exceptional circumstances justify an alternative approach (paras 60 and 61, NPPF). Planning Practice Guidance confirms that the NPPF expects strategic policy making authorities to follow the standard method in the Practice Guidance for assessing local housing need which identifies the minimum number of homes expected to be planned for. The Guidance advises that the standard method provides a minimum starting point in determining the number of homes needed in an area (Paragraph: 010 Reference ID: 2a-010-20201216).</p> <p>The plan should therefore use the housing need figure of 180 dwellings per annum as the minimum starting point and</p>	<p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>The Council will also undertake evidence gathering in terms of infrastructure and transport at a strategic and local level and the findings of these studies (and all evidence base) will inform policies related to housing and new development, including that related to the consideration and assessment of specific sites put forward for new growth opportunities.</p> <p>As part of this work, the Council has already begun and will continue to regularly engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions will continue to take shape.</p> <p>For example, 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.</p> <p>The Local Plan will consider a variety of sites by size and location to determine the best options for</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		consider the need for an uplift to address local economic aspirations or to address affordable housing needs.	delivering the Borough's housing requirement.  All sites received to date via the Call for Sites process in 2020 and 2021 will be taken into account accordingly.
Mather Jamie Ltd on behalf of Wheatcroft Properties Ltd	29 <sup>th</sup> October 2021	<p><b>Housing Density</b></p> <p>The currently adopted local plan sets out a range of density requirements by location, including an average density of at least 30 dwellings per hectare on sites outside the town and district centres and the Leicester Principal Urban Area.</p> <p>The approach to densities on sites is appropriate and should be carried forward into the new Local Plan. A minimum density target of 30 dwellings per hectare is appropriate for the land north of Glen Gorse Golf Course and the land off Welford Road.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p>
Mather Jamie Ltd on behalf of Wheatcroft Properties Ltd	29 <sup>th</sup> October 2021	<p><b>Affordable Housing</b></p> <p>The Council's current local plan sets a split target for affordable housing provision, with a target of 30% affordable housing in Oadby and 20% in Wigston, reflecting the different land values in the settlements in the Borough. This split approach to affordable housing provision remains appropriate and should be carried forward into the new local plan.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
			related to all aspects of the Plan.
Mather Jamie Ltd on behalf of Wheatcroft Properties Ltd	29 <sup>th</sup> October 2021	<p><b>Countryside</b></p> <p>The Issues and Options Paper advises that it is paramount that the Council continues to protect the countryside areas in the Borough. In view of the scale of future housing needs over the period to 2041, the Council will need to consider the release of greenfield sites to meet its housing requirements. Both the land north of Glen Gorse Golf Course and the land west of Welford Road offer the opportunity for residential development without significant landscape impacts.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>The Council will review all existing designations, including Countryside, as part of the emerging Local Plan.</p> <p>Therefore, this representation and the supporting submissions will be taken into account by the Council when reviewing the current Countryside Policy approach.</p>
Mather Jamie Ltd on behalf of Wheatcroft Properties Ltd	29 <sup>th</sup> October 2021	<p><b>Green Wedge</b></p> <p>The Issues and Options paper refers to existing Green Wedges identified in the adopted Local Plan including the Oadby and Wigston Green Wedge. The paper suggests that the Council will continue to maintain the Green Wedge</p>	<p>Noted.</p> <p>The Council will test various options during the course of preparing the Local Plan. A review of Green Wedges will be undertaken in the course of preparing the emerging new Local Plan.</p>

**Appendix A: Representations received during the Regulation 18A Issues and Options Local Plan Public Consultation 2021 (with Officer Responses)**

Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p>designations. Potential options include continuing with the existing policy or considering whether to undertake a Green Wedge review to establish whether or not to retain, create new or amend the boundaries of existing Green Wedges.</p> <p>The purpose of Green Wedges is to influence the form and direction of future development. They are not Green Belt and should be subject to review through the Local Plan in response to future housing requirements. This is the approach the Council took in relation to the adopted Local Plan and the identification of strategic growth options within areas of Green Wedge.</p> <p>In view of the scale of development to be accommodated over the plan period, the Council should undertake a review of Green Wedge boundaries to identify opportunities for development that would not threaten the function of the wider Green Wedge.</p> <p>The land north of Glen Gorse Golf Course falls within the Oadby and Wigston area of Green Wedge. Development on the site would not threaten the overall form and function of the Green Wedge and would not result in a reduction in the area of separation between Oadby and Wigston. The Green Wedge area should be amended to allow for a limited further extension to the Cottage Farm Direction for Growth.</p>	
Mather Jamie Ltd on behalf of Wheatcroft	29 <sup>th</sup> October 2021	<p><b>INFRASTRUCTURE</b></p> <p><b>Highways Infrastructure Need</b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance</p>



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Properties Ltd		<p>The consultation document seeks feedback on transport and infrastructure requirements and how these should be secured through new development. It is considered that the new Local Plan should take opportunities to make housing allocations where there will not be unacceptable impacts on highway safety or severe impacts on the highway network.</p> <p>The land parcels north of Glen Gorse Golf Course and west of Welford Road provide the opportunity for further residential development that would not result in severe impacts on the highway network. The sites are well located, with opportunities for sustainable travel modes, and situated within sustainable locations within proximity of local facilities and service.</p>	<p>with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>Collaborative work on cross-boundary issues has also begun. Further discussions will be necessary between OWBC and neighbouring LPAs as their respective emerging new Local Plans progress.</p>
Mather Jamie Ltd on behalf of Wheatcroft Properties Ltd	29 <sup>th</sup> October 2021	<p><b>DESIGN AND CHARACTER</b></p> <p><b>Design Codes</b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>

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		<p>The NPPF advises that local planning authorities should prepare design guides or codes that are consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences. The consultation document confirms that the Council will produce local design codes for the Borough, however, acknowledges that at this stage, there are no details in terms of number of design codes, what parts of the Borough they will relate to, or what level of detail they will include, however sets out that design codes will be produced in conformity with the National Model Design Code.</p> <p>The document sets out several potential options for the production of design codes. It is considered that local design codes should be high level documents, that are illustrative and less prescriptive; this approach will give a level of clarity and certainty, however, will also allow for a degree of flexibility.</p>	<p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the Council's approach into taking account of design codes in new developments have been noted and will be considered accordingly.</p>
Mather Jamie Ltd on behalf of Wheatcroft Properties Ltd	29 <sup>th</sup> October 2021	<p><b>Renewable and Low Carbon Energy Production</b></p> <p>The Issues and Options paper sets out several options for new buildings to incorporate renewable and low carbon energy infrastructure. As the evolution of such measures is moving quickly, it is considered that the most effective way in securing the provision of such measures should be through the building control process.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p> <p>The specific recommendations to improve and strengthen the relevant aspects have been noted</p>

**Appendix A: Representations received during the Regulation 18A Issues and Options Local Plan Public Consultation 2021 (with Officer Responses)**

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			and will be considered accordingly.
Mather Jamie Ltd on behalf of Wheatcroft Properties Ltd	29 <sup>th</sup> October 2021	<p><b>MASTERPLANNING</b></p> <p><b>Large Scale Change and Place Making</b></p> <p>The consultation document sets out that the Council will require the production of masterplans, development briefs or other appropriate strategies in accordance with Policy 3. The consultation document proposes to carry forward the existing policy, and make the definition of 'large scale change' consistent with the definition of major development within Annex 2 of the NPPF, which for housing is 10 dwellings or more.</p> <p>Whilst the existing policy does not appear to define large scale change, it is considered that 100 dwellings or more is an appropriate quantum of development for large scale change.</p> <p>This should be defined within the new Local Plan.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>In the context of defining what constitutes '<i>large scale change</i>' the Council considers the definition of '<i>major development</i>' as per the National Planning Policy Framework (NPPF 2021), to be the benchmark for defining this Policy approach. The definition included in the NPPF is '<i>for housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development, it means additional floorspace of 1,000m<sup>2</sup> or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015</i>'.</p>
National Highways	29 <sup>th</sup> October 2021	National Highways welcomes the opportunity to comment on the Oadby and Wigston Borough Council new Local Plan Issues and Options. We have undertaken a review of the issues and options report which we understand will be followed by the Local Plan preferred Options document, which is identified for publication in Summer 2022.	<p>Noted.</p> <p>The Council would like to thank National Highways for taking time to read through the consultation documents and for responding.</p>

**Appendix A: Representations received during the Regulation 18A Issues and Options Local Plan Public Consultation 2021 (with Officer Responses)**

Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
National Highways	29 <sup>th</sup> October 2021	<p>National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to this consultation, our principal interest is in safeguarding the operation of the M1 which routes approximately 5 miles west of the Local Plan area, and therefore our comments relate solely to the impact upon the SRN.</p> <p>In responding to Local Plan consultations, we have regard to DfT Circular 02/2013 - Strategic Road Network and the delivery of sustainable development ('the Circular') which sets out how interactions with the Strategic Road Network should be considered in the making of local plans. Paragraph 16 of the Circular sets out that:</p> <p><i>“Through the production of Local Plans, development should be promoted at locations that are or can be made sustainable, that allow for uptake of sustainable transport modes and support wider social and health objectives, and which support existing business sectors as well as enabling new growth.”</i></p> <p>In addition to the DfT Circular 02/2013, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.</p>	Noted.

**Appendix A: Representations received during the Regulation 18A Issues and Options Local Plan Public Consultation 2021 (with Officer Responses)**

Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p>In July 2021, National Highways previously responded to a Call for Sites for Growth Options for 2031 onwards - Initial Consultation with Key Stakeholders. Based on our review of the residential and employment sites and their location in relation to the SRN, we did not wish to raise any concerns at that time and considered that any impact would not be classed as severe.</p> <p>As was previously explained we are currently working with other Borough Councils, and the County Council to understand the impact upon the SRN of other Local Plans in the area and as such are supporting a Strategic Modelling exercise with each Authority.</p> <p>Therefore, whilst we raised no concerns, it was recommended that you liaise with neighbouring authorities so that the overall cumulative impact of proposed sites within the area is fully considered through this approach, and we would encourage this is continued.</p> <p>Having considered the Oadby and Wigston Borough Council New Local Plan Issues and Options Consultation document, we can provide the following comments:</p>	
National Highways	29 <sup>th</sup> October 2021	<p><b>Housing Need</b></p> <p>We understand that Leicester City Council may be unable to deliver its full housing need, although it is not expected that this will be provided within Oadby and Wigston, however this has not yet been determined.</p>	Noted.

**Appendix A: Representations received during the Regulation 18A Issues and Options Local Plan Public Consultation 2021 (with Officer Responses)**

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		<p>We understand that the current housing need for the borough is expected to increase from 148 new homes per year to 180. Paragraph 4.9 sets out that further assessment should be provided to evidence that existing highway capacity and infrastructure can accommodate the proposed growth.</p> <p>Should it be proposed that the annual housing numbers increase or Leicester City Councils unmet housing is provided within Oadby and Wigston, then the potential impact on the M1 should be considered.</p> <p>National Highways have no specific preference to any of the 3 options presented or comments to make on the questions provided.</p>	
National Highways	29 <sup>th</sup> October 2021	<p><b>Employment Need</b></p> <p>We understand that Leicester City Council may be unable to deliver their full employment need, and it is not expected that that this will be provided within Oadby and Wigston, however this has not yet been determined. Should it be proposed that additional employment be located within the Borough the potential impact on the M1 should be considered.</p> <p>With regard to Oadby and Wigton’s own employment need, planning permission has been granted for 5 of the 8 hectares required, although we understand that none of this has progressed past the planning stage.</p>	Noted.

**Appendix A: Representations received during the Regulation 18A Issues and Options Local Plan Public Consultation 2021 (with Officer Responses)**

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		<p>It is explained that there has not been a recent demand for large scale or strategic employment growth and the Council is not aware of any significant anecdotal need for additional employment land.</p> <p>We have no specific preference to any of the 3 options presented and no comments to make on the questions proposed.</p> <p>In relation to both the housing and employment needs, as previously advised we recommend liaising with neighbouring authorities so that the overall cumulative impact within the area is fully considered.</p> <p>We would also like to take this opportunity to request that all future consultations are directed to <a href="mailto:PlanningM@highwaysengland.co.uk">PlanningM@highwaysengland.co.uk</a> and any historic contacts at National Highways are removed from your address book.</p> <p>We have no further comments to provide and trust the above is useful in the progression of the progression of the Oadby and Wigston Borough Council New Local Plan Issues and Options.</p>	

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Natural England	29 <sup>th</sup> October 2021	<p><b>Oadby and Wigston New Local Plan - Sustainability Appraisal Scoping Report.</b></p> <p>Thank you for your consultation on the above dated 02 September 2021 which was received by Natural England on 02 September 2021.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England broadly welcomes the <b>Sustainability Appraisal Scoping Report</b> but has the following comments to make:</p>	<p>Noted.</p> <p>The Council would like to thank Natural England for taking time to read through the consultation documents and for responding.</p>
Natural England	29 <sup>th</sup> October 2021	<p><b>Part 2: Relevant policies, plans and programmes</b></p> <p>We welcome the reference to various sections of the NPPF within the National section but note that no other relevant international or local/regional plans, policies and programmes have been included. The text within this section states: <i>'The review of policies, plans, programmes, strategies and initiatives has been structured around key themes for ease of reference but has also been subdivided further to highlight the level of the policies and plans e.g. International, national, regional, county and local'</i>. However, the only category present is 'National'. Is this an accidental omission?</p>	<p>Noted.</p> <p>It is acknowledged that this is an omission and therefore, all relevant plans, policies and programmes will be included and considered as part of an update to the Sustainability Appraisal Scoping Report.</p>



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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p>We advise that all relevant plans, policies and programmes must be considered. This should include, but not be limited to: Green Infrastructure Strategies, Biodiversity Plans (i.e. Leicester, Leicestershire and Rutland Biodiversity Action Plan), Supplementary Planning Documents (i.e. Public Realm SPD) and Relevant landscape Plans and Strategies.</p> <p>We note the inclusion of a range of plans in the existing sustainability appraisal, detailed in Appendix 2 (Updated Review of Plans, Policies and Programmes) of the Sustainability Appraisal report (2017). It would be expected that the new SA would contain a similar review.</p>	
Natural England	29 <sup>th</sup> October 2021	<p><b>Part 3: Baseline Information</b></p> <p>The schedule of baseline information appears to be robust and up to date; Natural England have no specific comments on this section of the scoping report. Please see the document attached to our response email, named 'SA Evidence Advice', for our advice on sources of local plan evidence on the Natural Environment.</p>	<p>Noted.</p> <p>The additional information submitted as part of the 'SA Evidence Base' will also be taken into consideration. This includes various sources of local plan evidence on the natural environment and therefore will prove very useful to assist the Council with the continued preparation of the emerging New Local Plan.</p>
Natural England	29 <sup>th</sup> October 2021	<p><b>Part 4: Key Sustainability Issues</b></p> <p>We generally welcome the key sustainability issues identified within the scoping report; however, we note there is no reference made to the loss of Best and Most Versatile Land. NPPF paragraph 174 states that the economic and other benefits of BMV land should be recognised; therefore, we</p>	<p>Noted.</p> <p>The Council agree that reference should be made in the key sustainability issues to the loss of Best and Most Versatile Land, in accordance with NPPF paragraph 174.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		advise that any potential loss of BMV land should be considered a sustainability issue.	
Natural England	29 <sup>th</sup> October 2021	<p><b>Part 5: Sustainability Appraisal Framework</b></p> <p>We generally welcome the Sustainability Appraisal framework, along with the objective and subobjectives it identifies. We have the following more specific comments to make:</p> <p>We note the absence of reference to Best and Most Versatile Agricultural Land and suggest that an objective should be added to prevent the loss of this resource, in accordance with the NPPF.</p> <p>We note that access to the countryside is referenced in objective 8, however we suggest that this should be expanded to encompass access to nature as a whole, i.e. including urban greenspaces, parks, recreational facilities and Public Rights of Way, as all of these help to deliver the many benefits of accessing nature. The Covid-19 Pandemic has brought to the fore the importance of getting out in nature for people's physical and mental wellbeing.</p> <p>We also advise that objective 14 (sustainable development) should be amended to include enhancement of the local, national and global environment, as well as minimising impacts, in line with the NPPF (Paragraphs 20, 175, 179).</p>	<p>Noted.</p> <p>The Council agree that reference should be made in the key sustainability issues and / or objectives to the loss of Best and Most Versatile Land, in accordance with NPPF paragraph 174.</p> <p>The Council expand references to access to the countryside to include a access to nature as a whole, as suggested by Natural England.</p> <p>The Council will also amend objective 14 (sustainable development) as suggested to incorporate enhancement of the local, national and global environment, as well as minimising impacts, in line with the NPPF (Paragraphs 20, 175, 179).</p>
Natural England	29 <sup>th</sup> October 2021	<b>Part 6: Monitoring</b>	Noted.

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		<p>Natural England welcome the monitoring indicators identified within Table 8.</p> <p>We suggest that the monitoring indicators for objective 8 could be amended to include a percentage of the borough's population having suitable access to natural greenspace. Natural England's <a href="#">ANGST standards</a> could be a useful tool in assessing this.</p>	<p>The Council will explore the suggestion to amend the monitoring indicators in objective 8, and if possible, it will include a percentage of the borough's population having suitable access to natural greenspace.</p>
Natural England	29 <sup>th</sup> October 2021	<p><b>Oadby and Wigston New Local Plan - Issues and Options</b></p> <p>Thank you for your consultation on the above dated 02 September 2021 which was received by Natural England on 02 September 2021.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcome the consultation and have the following comments to make on the <b>Issues and Options Report</b>:</p>	<p>Noted.</p> <p>The Council would like to thank Natural England for taking time to read through the consultation documents and for responding.</p>
Natural England	29 <sup>th</sup> October 2021	<p><b>Part 2: Overarching Policy Areas</b></p> <p><b>Where Should Development Go?</b></p>	<p>Noted.</p>

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		<p>Natural England does not have a particular preference for the location of development but would wish to ensure that the chosen allocations result in no adverse impact on any designated nature conservation sites or protected landscapes. We would also advise that housing development should avoid Best &amp; Most Versatile Land (BMV) where possible to comply with paragraph 174 b of the NPPF.</p> <p>Natural England also advise that 'brownfield land' should be prioritised for development, as per the NPPF paragraph 119. We also note reference 47 of the NPPF, which caveats this: 'Except where this would conflict with other policies in this Framework, including causing harm to designated sites of importance for biodiversity'.</p>	
Natural England	29 <sup>th</sup> October 2021	<p><b>Part 6: Green Infrastructure</b></p> <p><b>Green Infrastructure</b></p> <p>Natural England generally welcome the current approach to Green Infrastructure within the Borough, seeking a net gain in GI, as well as the references made to the important role GI plays, as a Nature Based Solution, in mitigating and adapting to climate change.</p> <p>The benefits of good GI for both physical and mental wellbeing have been brought to the fore during the Covid-19 Pandemic, and we would like to see this reflected within policy wording regarding GI. There is also a commitment in the Government's 25 Year Environment Plan to green our towns and cities for</p>	<p>Noted.</p> <p>The Council welcome and will endeavour to action all of the suggestions to strengthen its approach to protecting and enhancing Green Infrastructure throughout the emerging New Local Plan document.</p> <p>The specific references to the Government's 25 Year Environment Plan are noted, as are all of the aspirations and commitments stemming from that to assist Natural England in its bid to deliver the Government's Nature Recovery Network through addressing biodiversity loss, climate change and wellbeing.</p>

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		<p>health and wellbeing, nature, climate resilience and prosperity, for disadvantaged urban populations, which should also be reflected within the policy wording.</p> <p>We would draw your attention to the GI National Standards project, which Natural England is currently working on and is also a commitment in the Government's 25 Year Environment Plan. The aim of this project is to achieve more, better quality, well managed GI at local and landscape scales, delivering multiple benefits for the people and places that need them most. Your authority may want to refer to these emerging standards as they become available.</p> <p>Finally, we welcome the various references to habitat connectivity, and we would like to see linkages made to Green Infrastructure throughout the plan, and particularly within policies such as Sustainable Drainage and Surface Water, Habitats and Biodiversity, Green Wedges, Climate Change etc.</p> <p>We also refer the LPA to the emerging Nature Recovery Network. The NRN is a major commitment of the 25YEP and aims to protect and enhance the network of habitats and greenspace across the country. The NRN will help us deal with 3 of the biggest challenges we face: biodiversity loss, climate change and wellbeing. More information can be found here:</p> <p><a href="https://www.gov.uk/government/publications/nature-recovery-network/nature-recovery-network">https://www.gov.uk/government/publications/nature-recovery-network/nature-recovery-network</a></p>	

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Natural England	29 <sup>th</sup> October 2021	<p><b>Green Wedges</b></p> <p>Natural England support the policy in the current Local Plan regarding Green Wedges, and suggest this is retained in the new plan. We note the current policy wording which supports proposals which enhance the role that the Green Wedges play in the Borough’s Green Infrastructure Network and its biodiversity. Green Wedges could also play a key part of the Nature Recovery Network mentioned above, and planning policy should reflect this.</p>	<p>Noted.</p> <p>The Council will seek to address the reference to the Nature Recovery Network in the Green Wedge policy approach.</p>
Natural England	29 <sup>th</sup> October 2021	<p><b>Countryside</b></p> <p>Natural England welcome the existing policy approach to development in the countryside and advise that new development in the countryside should only be permitted where a justifiable need can be demonstrated consistent with the principles set out in the NPPF, paragraph 80.</p>	<p>Noted.</p>
Natural England	29 <sup>th</sup> October 2021	<p><b>Sustainable Drainage and Surface Water</b></p> <p>We advise that more emphasis could be given to the multi-functional benefits of SuDS, which can be interlinked with Green Infrastructure, provide health and wellbeing benefits through amenity, and can even be integrated into designs to help developments achieve Biodiversity Net Gain.</p> <p>We welcome the current approach whereby maintenance and mitigation schemes are required where the site is in an area at risk of surface water flooding, however we suggest this could</p>	<p>Noted.</p> <p>The Council will seek to strengthen this section to reflect this advice.</p>

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		<p>be extended so maintenance schemes could be a requirement for all SuDS schemes within the borough, to ensure effective surface water drainage in the longer term. Failing this, areas where water quality is a known issue should be targeted, as poor maintenance of SuDS can negatively affect the water treatment properties of SuDS components. This could include developments within the catchment of the Kilby – Foxton Canal SSSI, which is in <a href="#">Unfavourable – No Change condition</a>, partly due to poor water quality.</p>	
Natural England	29 <sup>th</sup> October 2021	<p><b>Part 7: Environment and Sustainability</b></p> <p><b>Habitats and Biodiversity</b></p> <p>Natural England welcomes this section and the general approach to the protection and enhancement of biodiversity and increasing Natural Capital. We would also reiterate the importance of the Nature Recovery Network, as mentioned above, as a major initiative to achieve landscape scale improvements to natural habitats.</p>	<p>Noted.</p> <p>The Council will seek to strengthen this section to reflect this advice.</p>
Natural England	29 <sup>th</sup> October 2021	<p><b>Biodiversity Net Gain</b></p> <p>Natural England welcome the commitment to achieving net gain through new development.</p> <p>The government is intending that it will mandate net gains for biodiversity on all new developments in England to deliver an overall increase in biodiversity. As mentioned within the consultation document, the NPPF and PPG describe Net Gain</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p>

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		<p>as 'measurable'. It is therefore important to have in place a tried and tested method for implementing Net Gain. Natural England give preference to the use of our Biodiversity Metric 3.0, however, this is not a requirement and other metrics may be suitable. The advantage of using a recognised metric to deliver net gain is that it provides a clear, transparent and evidence-based approach to assessing a project's biodiversity impacts that can assist with "de-risking" a development through the planning process and contribute to wider placemaking. The new and improved Biodiversity Metric 3.0 has recently launched, alongside the Small Sites Metric (Beta Test Version) and the Environmental Benefits from Nature Tool (Beta Test Version). The tools can be accessed <a href="#">here</a> and include user guides and technical supplements.</p> <p>We also advise that a specific target for Biodiversity Net Gain should be set which developments must achieve. The expectation is that the government will mandate a minimum 10% net gain across all development. This is not a limit, however any target should be achievable and evidence based. Your authority may want to consider including a target within a Supplementary Planning Document on Biodiversity Net Gain which would be a good way to offer developers further advice on this topic and can be updated as guidance from the Environment Bill emerges.</p> <p>Policy should also set out how biodiversity net gain will be delivered and managed and the priorities for habitat creation or enhancement in different parts of the plan area. The plan policy should set out the approach to onsite and offsite</p>	<p>The Council is committed to working with Local Authorities in Leicester, Leicestershire and Rutland to develop up to date evidence and understanding of this complex and ever changing aspect of Plan making.</p> <p>All of the specific recommendations from Natural England will be taken into consideration to inform the emerging evidence, as well as the approach included in the new Local Plan.</p>



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		<p>delivery. Natural England advises that on-site provision should be preferred as it helps to provide gains close to where a loss may have taken place. Off-site contributions may, however, be required due to limitations on-site or where this best meets wider biodiversity objectives set in the development plan. Further detail could again be set out in a supplementary planning document.</p> <p>The plan's approach to biodiversity net gain should be compliant with the mitigation hierarchy, as outlined in paragraph 175 of the NPPF. The policy should ensure that biodiversity net gain is not applied to irreplaceable habitats and should also make clear that any mitigation and/or compensation requirements for European sites should be dealt with separately from biodiversity net gain provision.</p> <p>Your plan should also include requirements to monitor biodiversity net gain. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.</p> <p>LPAs should work with local partners, including the Local Environmental Record Centre and wildlife trusts, to share data and consider requirements for long term habitat monitoring. Monitoring requirements should be clear on what is expected</p>	

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		<p>from landowners who may be delivering biodiversity net gains on behalf of developers. This will be particularly important for strategic housing allocations and providing as much up front information on monitoring will help to streamline the project stage.</p>	
Natural England	29 <sup>th</sup> October 2021	<p><b>Wider Environmental Net Gain</b></p> <p>Natural England focusses our advice on embedding biodiversity net gain in development plans, since the approach is better developed than for wider environmental gains. However your authority should consider the requirements of the NPPF (paragraph 73, 104, 120 and 174) and seek opportunities for wider environmental net gain wherever possible. This can be achieved by considering how policies and proposed allocations can contribute to wider environment enhancement, help adapt to the impacts of climate change and/or take forward elements of existing green infrastructure, open space or biodiversity strategies. Opportunities for environmental gains, including nature based solutions to help adapt to climate change, might include.</p> <ul style="list-style-type: none"> <li>- Identifying opportunities for new multi-functional green and blue infrastructure.</li> <li>- Managing existing and new public spaces to be more wildlife friendly (e.g. by sowing wild flower strips) and climate resilient</li> <li>- Planting trees, including street trees, characteristic to the local area to make a positive contribution to the local landscape.</li> </ul>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p> <p>The Council is committed to working with Local Authorities in Leicester, Leicestershire and Rutland to develop up to date evidence and understanding of this complex and ever changing aspect of Plan making.</p> <p>All of the specific recommendations from Natural England will be taken into consideration to inform the emerging evidence, as well as the approach included in the new Local Plan.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<ul style="list-style-type: none"> <li>- Improving access and links to existing greenspace, identifying improvements to the existing public right of way network or extending the network to create missing footpath or cycleway links.</li> <li>- Restoring neglected environmental features (e.g. a hedgerow or stone wall or clearing away an eyesore)</li> <li>- Designing a scheme to encourage wildlife, for example by ensuring lighting does not pollute areas of open space or existing habitats.</li> </ul> <p>Any habitat creation and/or enhancement as a result of the above may also deliver a measurable biodiversity net gain.</p> <p>We draw your attention to the Environmental Benefits from Nature tool which is designed to work alongside Biodiversity metric 3.0 and provide developers, planners and other interested parties with a means of enabling wider benefits for people and nature from biodiversity net gain. The Beta version of this tool is currently out for consultation and is available here:</p> <p><a href="http://publications.naturalengland.org.uk/publication/6414097026646016">http://publications.naturalengland.org.uk/publication/6414097026646016</a></p>	
Natural England	29 <sup>th</sup> October 2021	<p><b>Climate Change</b></p> <p>We generally welcome the current approach taken within Policy 38 of the existing plan, requiring the use of sustainable resources and the meeting of high standards of sustainable design and construction. However, Nature Based Solutions</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>

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		<p>are not mentioned within the current climate change policy; we would like to see reference made to this in the new plan. Natural England, the Environment Agency and the Forestry Commission have recently produced a shared vision to use nature-based solutions to tackle the climate and ecological emergency. This includes delivering woodland planting in the right places, working with nature to manage flood risk, taking a strategic approach to land use and encouraging the use of less carbon intensive materials. You can read more here:</p> <p><a href="https://www.gov.uk/government/news/environmental-bodies-set-joint-vision-to-tackleclimate-change">https://www.gov.uk/government/news/environmental-bodies-set-joint-vision-to-tackleclimate-change</a>.</p> <p>We welcome the reference made to the 25 Year Environment Plan (YEP) and suggest reference should also be made to the Nature Recovery Network within policy regarding climate change, habitats and biodiversity.</p>	<p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p> <p>The specific recommendations to include references to Nature Based Solutions and Nature Recovery Network in the Climate Change sections of the Plan is noted and will be considered accordingly.</p>
Natural England	29 <sup>th</sup> October 2021	<p><b>Part 10: Design and Character</b></p> <p><b>Landscape and Character</b></p> <p>Natural England welcome the reference made to the borough's Landscape Character Assessment, and also the rolling forward of the existing policy, however we also suggest you may also want to make reference to the National Character Areas (NCAs) which divide England into 159 distinct natural areas. Each is defined by a unique combination of landscape, biodiversity, geodiversity, history, and cultural and economic activity.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p> <p>The specific recommendations to include references to the National Character Areas (NCAs) is noted</p>

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		<p><a href="https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decisionmaking/national-character-area-profiles#ncas-in-east-midlands">https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decisionmaking/national-character-area-profiles#ncas-in-east-midlands</a></p>	<p>and will be considered accordingly. It is apparent that National Character Area <a href="#">profile 93</a>: High Leicestershire and National Character Area <a href="#">profile 94</a>: Leicestershire Vales are of relevance to the Borough of Oadby and Wigston.</p>
Natural England	29 <sup>th</sup> October 2021	<p><b>Local Green Spaces</b></p> <p>The suggested strategic approach to Local Green Space designation is welcomed and in line with the requirements of the NPPF. The proposed Review Assessment is also a good project in order to ensure all designations are evidence-based and in line with national and local policy.</p> <p>We also suggest that Natural England’s ANGST Standards could be a useful tool that can help ensure adequate provision of accessible natural greenspace. They may also be a useful tool to consider within the Review Assessment of currently Designated Local Green Space. More info can be found here: <a href="http://publications.naturalengland.org.uk/publication/65021">http://publications.naturalengland.org.uk/publication/65021</a>.</p> <p>Once again, we suggest a link could be made within this policy to the Nature Recovery Network (NRN), as Local Green Spaces can provide essential protection through policy to important green corridors and networks which would otherwise be unprotected.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, including the Local Green Space Review Assessment.</p> <p>The Council will also take into consideration Natural England’s Accessible Natural Green Space Standards in Towns and Cities (ANGST) Standards as part of that assessment. The Council will also explore the links to the Nature Recovery Network (NRN) in this context.</p>
Natural England	29 <sup>th</sup> October 2021	<b>Design Codes</b>	Noted.

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		<p>Natural England advises that design should maximise opportunities to incorporate measures which enhance the biodiversity value of development. It should encourage the retention of natural features including hedgerows, trees, and waterbodies particularly where these features offer a valuable habitat to support biodiversity. Policy wording should reflect the guidance set out in the National Design Guidance which specifically recommends that nature should contribute to the quality of a place, and to people’s quality of life, and it is a critical component of well-designed places. We would also like to suggest the possibility of a SuDS design code. SuDS are a relatively new development and, where designed appropriately, have the potential to contribute various positive outcomes, including biodiversity enhancement, amenity provision, flood risk reduction, water quality improvements and net gain delivery. Guidance on sustainable drainage systems, including design criteria, can be found in the <a href="#">CIRIA SuDS Manual (2015) C753</a>.</p>	<p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p> <p>The specific recommendations relating to guidance set out in the National Design Guidance, as well as the suggestion to pay greater attention to sustainable drainage systems (SuDS) and the role that they can play, potentially through creating a SuDS design code.</p> <p>The Council will explore these recommendations as the emerging new Local Plan progresses.</p>
Natural England	29 <sup>th</sup> October 2021	<p><b>Renewable and Low Carbon Energy Production</b></p> <p>Natural England support the implementation of policies which would require the use of renewable energy generation, however, a balance must be struck between long term benefits and short term impacts, as set out in paragraph 155 of the NPPF.</p> <p>Paragraph 155 of the NPPF also states that plans should consider identifying suitable areas for renewable and low carbon energy sources, where this would help secure their</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p> <p>The specific recommendations relating to the NPPF</p>

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		<p>development. We suggest that a renewable energy opportunities study could help to improve the evidence base regarding renewable energy in the borough.</p> <p>Natural England have published various reports regarding renewable energy: <a href="#">Natural England Access to Evidence - Renewable energy</a>. We also note that wind energy developments must be considered in line with NPPF paragraph 158.</p>	<p>and Natural England's publications have been noted, as well as the suggestion that a Renewable Energy Opportunities Study could help to improve the emerging Local Plan's evidence base regarding renewable energy in the Borough.</p> <p>These have all been noted and will be considered accordingly as preparation of the Plan continues.</p>
Natural England	29 <sup>th</sup> October 2021	<p><b>Public Realm</b></p> <p>The Public Realm SPD is welcomed by Natural England. The focus on pedestrians and prioritising walking routes is also much needed. As mentioned previously, the importance of getting out in nature regularly has been brought to the fore by the Covid-19 pandemic, and taking opportunities to improve walking routes and enhance green walking/commuting routes is key to improving/maintaining people's health and wellbeing.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects relating to enhance green walking/commuting routes have been noted</p>

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			<p>and will be considered accordingly.</p> <p>In addition, the Council will seek to give consideration to the national cycling infrastructure design guide (LTN1/20) and its Cycling and Walking Strategy (July 2021). The Council will also refer to the latest version of the Local Cycling and Walking Infrastructure Plan (LCWIP) for the Borough, being prepared by Leicestershire County Council.</p> <p>The Council is also actively monitoring announcement from Active Travel England (ATE) and will seek to engage with them as appropriate, in due course.</p>
Natural England	29 <sup>th</sup> October 2021	<p><b>Part 12: Health and Wellbeing</b></p> <p><b>Open Space, Sport and Recreation Facilities</b></p> <p>Natural England encourages links to green infrastructure and biodiversity to be made within this policy; open spaces, sport and recreation facilities all have a role to play in developing the Nature Recovery Network.</p>	Noted.
Natural England	29 <sup>th</sup> October 2021	<p><b>Part 14: Heritage</b></p> <p>The role of heritage in delivering environmental and multi-functional benefits is often overlooked. Opportunities to secure multiple benefits should be sought wherever possible, for</p>	Noted.



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		example historic walking routes should be preserved and enhanced not only for their heritage value, but for the role they play in improving people's access to nature, health and wellbeing and even habitat connectivity.	
Natural England	29 <sup>th</sup> October 2021	<p><b>Additional Comments</b></p> <p><b>Best and Most Versatile Agricultural Land</b></p> <p>Natural England note that no reference has been made to Soils or Best and Most Versatile Agricultural Land. NPPF paragraph 174 states that the economic and other benefits of BMV land should be recognised; therefore we advise that throughout the Local Plan appropriate weight should be given to the roles performed by the area's soils. These should be valued as a finite multifunctional resource which underpins our wellbeing and prosperity. Decisions about all types of development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.</p> <p>The plan should safeguard the long-term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future in line with National Planning Policy Framework paragraph 174.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>The specific recommendation in accordance with the NPPF to make reference to and to consider Soils or Best and Most Versatile Agricultural Land throughout the Local Plan has been noted and the Council will seek to consider this in more detail as the emerging new Local Plan progresses.</p>
Natural England	29 <sup>th</sup> October 2021	<p><b>District Level Licencing for Great Crested Newts</b></p> <p>We note that the borough currently has an active DLL scheme (Leicestershire, Rutland, Rushcliffe and South Kesteven) and</p>	<p>Noted.</p> <p>The specific recommendation to make reference to the District Level Licencing (DLL) Scheme for</p>

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		<p>suggest that reference should be made to this within the plan. Where a licence may be required for Great Crested Newt, DLL provides a quicker, simpler licensing approach. Some advantages of the DLL scheme include:</p> <ul style="list-style-type: none"> <li>• <b>Speed:</b> On average, obtaining a DLL brings a time saving of 77 days compared to mitigation licencing.</li> <li>• <b>Simplicity:</b> DLL does not require extensive on-site survey or mitigation measures by the developer, hence the licencing process is much more streamlined than mitigation licencing.</li> <li>• <b>Efficiency of conservation:</b> 85% of the developer's investment goes directly towards habitat creation/restoration, compared to approximately 16% under mitigation licencing.</li> </ul> <p>Please see <a href="#">this link</a> for further information on how to join a district level licensing scheme to manage great crested newt (GCN) populations if you are developing land in certain parts of England.</p>	<p>Leicestershire, Rutland, Rushcliffe and South Kesteven in the emerging new Local Plan has been noted and will be taken into consideration as preparation of the emerging Preferred Option draft document progresses.</p>
NHS Property Services Ltd	26 <sup>th</sup> October 2021	<p><b>Oadby and Wigston New Local Plan: Issues and Options consultation</b></p> <p>Thank you for the opportunity to comment on the above document. The following comments are submitted by NHS Property Services (NHSPS).</p>	<p>Noted.</p> <p>The Council would like to thank NHS Property Services for taking time to read through the consultation documents and for responding.</p>
NHS Property Services Ltd	26 <sup>th</sup> October 2021	<p><b>Introducing NHS Property Services</b></p> <p>NHSPS was established on the 1 April 2013 and is an organisation that plays a vital role in the day to day running of</p>	<p>Noted.</p>

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		<p>the NHS, managing and developing over 4,000 properties across England. The estate includes:</p> <ul style="list-style-type: none"> <li>• Primary Care Properties</li> <li>• Community Care Properties</li> <li>• GP Practices</li> <li>• Administrative Buildings</li> </ul> <p>Whilst being a private limited company, NHSPS is 100 per cent owned by the Secretary of State for Health, and at the same time, an important member of the wider NHS family.</p> <p>One of NHSPS main roles is strategic estates management. This involves acting as a landlord, modernising facilities, buying new facilities and selling facilities the NHS no longer needs.</p> <p>As part of this strategic estates management, NHSPS looks to play an influential role in the planning process, ensuring that future requirements for health are accurately measured and planned for, and is proactively engaged in the production of development planning documents across England.</p> <p>NHSPS also works with Clinical Commissioning Groups (CCG's) and emerging Integrated Care Systems (ICSs), as well as NHS England/Improvement to ensure that the NHS is sufficiently protected and enhanced through the planning system, both at a national and local level.</p>	

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NHS Property Services Ltd	26 <sup>th</sup> October 2021	<p>We welcome the opportunity to comment on the emerging Local Plan and would like to set out some priorities for NHSPS at this early stage of the consultation process.</p> <p>1. It is essential that all planning policies enable flexibility within the NHS estate. Where it can be demonstrated that health facilities will be changed as part of wider NHS estate reorganisation programmes, it should be accepted that a facility is neither needed nor viable for its current use and Planning policies within the Local Plan must support the principle of alternative uses for NHS land and property. This will ensure that there is not a delay to vital reinvestment in facilities and services for the community. Similarly, we also encourage policies which promote flexibility for healthcare sites to be extended/expanded/built across the borough as and where required by the NHS.</p> <p>2. There is a well-established connection between planning and health. Planning policies can not only facilitate improvements to health infrastructure, but also provide a mechanism to improve people's health. We request that the Local Plan includes policies for health and wellbeing which reflect the wider determinants of health and promote healthy and green lifestyle choices through well designed places.</p> <p>3. In areas of significant housing growth, appropriate funding must be consistently leveraged through developer contributions for health and care services in order to meet growing demand. We request that when setting planning obligation policies, the Council seek to address strategic</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>The Council has committed to working in partnership with the Integrated Care Systems (formerly CCG's) and also with Public Health to ensure that Infrastructure planning in the locality can be co-ordinated as well as possible.</p> <p>The Council recognise the importance of collaborative working to embed health and wellbeing into the Local Plan, throughout all of its Policy's.</p> <p>Health infrastructure is an important aspect of local and strategic infrastructure planning and therefore, as part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>

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		<p>as well as local priorities for health infrastructure in terms of planning obligations and engage the NHS in the process as early as possible.</p> <p>NHSPS thanks the Council for the opportunity to comment on the Oadby and Wigston New Local Plan and look forward to working with you to ensure that the needs of the health service are taken into consideration.</p>	
Pegasus Group on behalf of David Wilson Homes	29 <sup>th</sup> October 2021	<p><b>Oadby and Wigston Local Plan Issues and Options Consultation</b></p> <p>Thank you for the opportunity to comment on the Issues and Options version of the Oadby and Wigston Local Plan. These representations are made in relation to David Wilson Homes' interests in land to the south-east of Wigston (Wigston Meadows Phase 3). A submission was made to the Call for Sites and the site is included in the Council's Site Collation and Initial Assessment report, Spring 2021 under site reference WIG/002. We would offer the following comments on the Key Challenges and Potential Options set out in the document.</p>	<p>Noted.</p> <p>The Council would like to thank Pegasus Group on behalf of David Wilson Homes for taking time to read through the consultation documents and for responding.</p>
Pegasus Group on behalf of David Wilson Homes	29 <sup>th</sup> October 2021	<p><b>OVERARCHING POLICY AREAS</b></p> <p><b>The Plan Period and Cooperation</b></p> <p>The Options document suggests a plan period up to 2041 that reflects the time period for strategic evidence being prepared</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>Local planning authorities in the Housing Market</p>

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		<p>by the Leicester and Leicestershire HMA authorities. The suggested timeframe for the plan is supported.</p> <p>In terms of Statements of Common Ground, it would be appropriate leading up to the Examination in Public on the Plan for the Council to enter into Statements of Common Ground with key developer interests promoting sites selected for allocation.</p> <p>However, the most important Statement of Common Ground is the agreement of a Statement of Common Ground between the HMA authorities on the distribution of Leicester's unmet needs. This agreement is needed as a matter of urgency to enable local authorities to progress with the preparation of their plans.</p>	<p>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.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Pegasus Group on behalf of David Wilson Homes	29 <sup>th</sup> October 2021	<p><b>Where Should Development Go?</b></p> <p>Potential options identified in the consultation document include concentrating development within existing urban areas, focusing development towards greenfield sites or taking a balanced approach to new development with a mix of urban and greenfield development.</p> <p>It is clear that the Council will be unable to meet its future housing requirement solely on brownfield sites. The most appropriate strategy will be to plan for a mix of urban and greenfield sites of different sizes and locations to ensure that the housing requirement in the Borough is delivered over the plan period. Greenfield site releases will be necessary</p>	<p>Noted.</p> <p>All sites received to date via the Call for Sites process in 2020 and 2021 will be taken into account accordingly.</p> <p>The Council are currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing, including that related to the consideration and assessment of specific sites put forward for new growth opportunities.</p>

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		<p>as part of a portfolio of housing sites to deliver the housing requirement.</p> <p>The land at Wigston Meadows Phase 3 provides a suitable and sustainable opportunity to expand on the existing South-East Wigston Direction for Growth to provide at least a further 400 dwellings. The Phase 3 land is identified as a buffer against the housing target in the adopted plan to only be released if delivery on housing sites is slower than anticipated. It is therefore logical that this land represents the first priority for allocation in the new Local Plan to meet future housing requirements, having been confirmed as a suitable location for further housing growth in the adopted plan to address delivery shortfalls – an approach supported by the Local Plan Inspector. The site is well related to the existing urban area and is close to local facilities, including new facilities to be provided as part of the Wigston Meadows development.</p>	<p>As part of this work, the Council has already and will continue to seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions will continue to take shape.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council’s Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>The Council will also undertake evidence gathering in terms of infrastructure and transport at a strategic and local level and the findings of these studies (and all evidence base) will inform policies related to housing and new development, including that related to the consideration and assessment of specific sites put forward for new growth opportunities.</p>
Pegasus Group on behalf of David Wilson Homes	29 <sup>th</sup> October 2021	<p><b>HOUSING</b></p> <p><b>Housing Need</b></p> <p>The Issues and Options consultation outlines options for calculating housing needs for the plan period, including continuing to use the current housing requirement of 148 dwellings a year, applying the standard method figure of 180</p>	<p>Noted.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council’s Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p>

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		<p>dwelling a year or using outputs from the Housing and Employment Needs Assessment.</p> <p>The NPPF and Planning Practice Guidance are clear that 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 and 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, unless exceptional circumstances justify an alternative approach (paras 60 and 61, NPPF). Planning Practice Guidance confirms that the NPPF expects strategic policy making authorities to follow the standard method in the Practice Guidance for assessing local housing need which identifies the minimum number of homes expected to be planned for. The Guidance advises that the standard method provides a minimum starting point in determining the number of homes needed in an area (Paragraph: 010 Reference ID: 2a-010-20201216).</p> <p>The plan should therefore use the housing need figure of 180 dwellings per annum as the minimum starting point and consider the need for an uplift to address local economic aspirations or to address affordable housing needs.</p>	<p>The Council will also undertake evidence gathering in terms of infrastructure and transport at a strategic and local level and the findings of these studies (and all evidence base) will inform policies related to housing and new development, including that related to the consideration and assessment of specific sites put forward for new growth opportunities.</p> <p>As part of this work, the Council has already begun and will continue to regularly engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions will continue to take shape.</p> <p>For example, 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.</p> <p>The Local Plan will consider a variety of sites by size and location to determine the best options for delivering the Borough's housing requirement.</p> <p>All sites received to date via the Call for Sites process in 2020 and 2021 will be taken into account accordingly.</p>



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Pegasus Group on behalf of David Wilson Homes	29 <sup>th</sup> October 2021	<p><b>Housing Density</b></p> <p>The currently adopted local plan sets out a range of density requirements by location, including an average density of at least 30 dwellings per hectare on sites outside the town and district centres and the Leicester Principal Urban Area. The approach to densities on sites is appropriate and should be carried forward into the new Local Plan. A minimum density target of 30 dwellings per hectare is appropriate for the land at Wigston Meadows Phase 3.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p>
Pegasus Group on behalf of David Wilson Homes	29 <sup>th</sup> October 2021	<p><b>Affordable Housing</b></p> <p>The Council's current local plan sets a split target for affordable housing provision, with a target of 30% affordable housing in Oadby and 20% in Wigston, reflecting the different land values in the settlements in the Borough. This split approach to affordable housing provision remains appropriate and should be carried forward into the new local plan.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p>
Pegasus Group on behalf of David Wilson	29 <sup>th</sup> October 2021	<p><b>Older Persons Housing</b></p>	<p>Noted.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Homes		<p>The consultation document sets out options for securing older persons accommodation in the Borough, including that all developments of 10 or more dwellings must provide homes for older persons accommodation, all developments of 10 or more dwellings will be encouraged to provide homes for older persons accommodation, or alternatively an offsite contribution from all sites of 10 dwellings or more.</p> <p>The provision of older persons housing should be encouraged within the New Local Plan, and the policy approach should be flexible rather than overly prescriptive. However, the policy approach should acknowledge that not all residential sites will be appropriately located within close proximity to facilities and services, and therefore it is not always appropriate to request provision on site. In order to meet the needs of older people, the Council should look to make specific allocations for older persons accommodation that are within close proximity of public transport, local amenities and health services, which is often within or near to existing town centre.</p>	<p>local level. This new evidence will help to inform the Council’s Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>In addition to this, the Council will also undertake a whole plan viability assessment, as well gather evidence for other aspects of the plan relating to infrastructure and housing choices. The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the emerging new Local Plan and by doing so, these discussions can begin to take place.</p> <p>With regards to the specific recommendations on where to locate older person housing, the comments will be considered accordingly as the preparation of the emerging new Local Plan document continues to progress.</p>
Pegasus Group on behalf of David Wilson Homes	29 <sup>th</sup> October 2021	<p><b>Countryside</b></p> <p>The Issues and Options Paper advises that it is paramount that the Council continues to protect the countryside areas in the Borough. In view of the scale of future housing needs over the period to 2041, the Council will need to consider the release of greenfield sites to meet its housing requirements. Land at Wigston Meadows Phase 3 provides the opportunity for further residential development to meet housing needs without unacceptable landscape impacts.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council’s Policy position, with the findings of these</p>

**Appendix A: Representations received during the Regulation 18A Issues and Options Local Plan Public Consultation 2021 (with Officer Responses)**

Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
			<p>studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>The Council will review all existing designations, including Countryside, as part of the emerging Local Plan.</p> <p>Therefore, this representation and the supporting submissions will be taken into account by the Council when reviewing the current Countryside Policy approach.</p>
Pegasus Group on behalf of David Wilson Homes	29 <sup>th</sup> October 2021	<p><b>ENVIRONMENT AND SUSTAINABILITY</b></p> <p><b>Habitats and Biodiversity</b></p> <p>The Issues and Options consultation asks whether the Council should be making use of Natural England's Biodiversity Metric, or whether there are more appropriate ways of calculating biodiversity net gain. Natural England has recently released the Biodiversity Metric 3 and the Environment Bill sets out a requirement of biodiversity net gain. It is important that the new Local Plan is up to date with current and emerging national planning policy and guidance.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p> <p>With regards to the Policy approach on Geodiversity and Biodiversity, the Council is committed to working with Local Authorities in Leicester, Leicestershire and Rutland to develop up to date evidence and understanding of this complex and ever changing aspect of Plan making.</p>
Pegasus	29 <sup>th</sup> October	<b>INFRASTRUCTURE</b>	Noted.

**Appendix A: Representations received during the Regulation 18A Issues and Options Local Plan Public Consultation 2021 (with Officer Responses)**

Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Group on behalf of David Wilson Homes	2021	<p><b>Highways Infrastructure Need</b></p> <p>The consultation document seeks feedback on transport and infrastructure requirements and how these should be secured through new development. It is considered that the new Local Plan should take opportunities to make housing allocations where there will not be unacceptable impacts on highway safety or severe impacts on the highway network. The land at Wigston Meadows Phase 3 provides the opportunity for further residential development that would not result in severe impacts on the highway network. The site is well located, with opportunities for sustainable travel modes, and situated within a sustainable location within proximity of local facilities and service.</p>	<p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>Collaborative work on cross-boundary issues has also begun. Further discussions will be necessary between OWBC and neighbouring LPAs as their respective emerging new Local Plans progress.</p>
Pegasus Group on behalf of	29 <sup>th</sup> October 2021	<b>Viability</b>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
David Wilson Homes		<p>The consultation document seeks feedback on infrastructure and developer contributions, asking whether the current policy approach should be rolled forward, or whether a new approach taking account of the requirement to develop a Whole Plan Viability Assessment should be considered.</p> <p>Any policy in relation to infrastructure and developer contributions should reflect the approach set out within paragraphs 34 and 58 of the NPPF. Paragraph 34 advises that plans should set out the contributions expected from development, such as affordable housing and other infrastructure, and notes that such policies should not undermine the deliverability of the plan. Paragraph 58 confirms that all viability assessments, including those undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs. The approach to infrastructure and developer contributions should reflect the approach within the NPPF and PPG and therefore a Whole Plan Viability Assessment is required to be undertaken.</p> <p>The new Local Plan should include housing allocations that do not require the provision of significant new infrastructure, and allocations should be made in suitable locations to ensure that proposed allocations are viable. Land at Wigston Meadows Phase 3 provides a viable development opportunity that does not require significant new infrastructure.</p>	<p>with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects in relation to the need for a Whole Plan Viability Assessment have been noted and will be considered accordingly.</p>
Pegasus Group on	29 <sup>th</sup> October 2021	<b>HOUSING</b>	Noted.

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behalf of David Wilson Homes		<p><b>Technical Housing Standards</b></p> <p>The proposed approach to requiring all new homes to comply with the Technical Housing Standards is not supported. Footnote 49 of the NPPF advises that "<i>planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified</i>".</p> <p>The Council's approach should recognise that an inflexible policy will impact on affordability and affect customer choice. Smaller dwellings play a valuable role in meeting specific needs for both open market and affordable home ownership housing. The PPG sets out that "<i>where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies. Authorities should take account of the following areas need, viability and timing</i>" (ID: 56-020-20150327). The Council should provide clear evidence through a local assessment evidencing its case should this option be pursued.</p>	<p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Pegasus Group on behalf of David Wilson Homes	29 <sup>th</sup> October 2021	<p><b>Self and Custom Build</b></p> <p>The policy approach within the current Local Plan seeks to support the provision of self build and custom build plots. The consultation document seeks feedback on whether this</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p>approach should be continued within the new Local Plan, or whether the policy approach should be strengthened to require self-build and custom build plots on all major development sites.</p> <p>There is no legislative or national policy basis for imposing an obligation on landowners or developers to include plots for self and custom build housing on major development sites. Paragraph 62 of the NPPF and the Self Build and Custom Housebuilding Act 2015 confirm that it is the Council's responsibility to ensure that sufficient permissions are given to meet demand. The PPG sets out ways in which the Council should consider supporting self and custom build by engaging with developers and encouraging the consideration of self and custom build, and facilitating access to those on the register, where the landowner is interested.</p>	
Pegasus Group on behalf of David Wilson Homes	29 <sup>th</sup> October 2021	<p><b>Sustainable Homes</b></p> <p>The consultation document sets out several options for including measures to reduce greenhouse gases within the design of new homes, including solar panels, electric vehicle charging and air source heat pumps. As the evolution of such measures is moving quickly, it is considered that the most effective way in securing the provision of such measures should be through the building control process.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>
Pegasus Group on behalf of	29 <sup>th</sup> October 2021	<p><b>Housing Choices</b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance</p>

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David Wilson Homes		<p>Policy 11 of the current Local Plan sets out the policy position in relation to housing mix. The consultation document confirms that this approach has been successful in providing a wide range and choice of new homes and therefore the Council will look to continue this approach, with amendments to ensure that it is up to date with national and local policy and guidance. As the existing policy has been effective in ensuring the delivery of a mix of homes, this approach is considered appropriate for the Council to carry forward to the new Local Plan.</p>	<p>with the relevant Government Acts, Regulations, policy and guidance.</p>
Pegasus Group on behalf of David Wilson Homes	29 <sup>th</sup> October 2021	<p><b>DESIGN AND CHARACTER</b></p> <p><b>Design Codes</b></p> <p>The NPPF advises that local planning authorities should prepare design guides or codes that are consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences. The consultation document confirms that the Council will produce local design codes for the Borough, however, acknowledges that at this stage, there are no details in terms of number of design codes, what parts of the Borough they will relate to, or what level of detail they will include, however sets out that design codes will be produced in conformity with the National Model Design Code.</p> <p>The document sets out several potential options for the production of design codes. It is considered that local design codes should be high level documents, that are illustrative</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>



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		and less prescriptive; this approach will give a level of clarity and certainty, however, will also allow for a degree of flexibility.	
Pegasus Group on behalf of David Wilson Homes	29 <sup>th</sup> October 2021	<p><b>Renewable and Low Carbon Energy Production</b></p> <p>The Issues and Options paper sets out several options for new buildings to incorporate renewable and low carbon energy infrastructure. As the evolution of such measures is moving quickly, it is considered that the most effective way in securing the provision of such measures should be through the building control process.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>
Pegasus Group on behalf of David Wilson Homes	29 <sup>th</sup> October 2021	<p><b>HEALTH AND WELLBEING</b></p> <p><b>Open Space, Sport and Recreation Facilities</b></p> <p>The consultation document considers that the most suitable option is to carry forward the existing Local Plan Policy 9 into the new Local Plan. The document acknowledges that the current policy approach has been effective and therefore the Council propose to review and update the evidence base to ensure that all necessary infrastructure can be delivered in order to support the planned level of growth to 2041. This approach is supported.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p>
Pegasus Group on behalf of David Wilson Homes	29 <sup>th</sup> October 2021	<p><b>Health Impact Assessments</b></p> <p>Policy 5 requires all major development proposals to be accompanied by a Health Impact Assessment screening statement, to consider the potential impact and demands of</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping</p>

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		<p>the development proposal upon existing services and facilities. Potential options consider continuing with this approach and continuing to work with all relevant stakeholders, through the Local Plan and planning application processes. This approach is supported.</p>	<p>to inform policies related to on or off site infrastructure delivery such as this.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>There is now an interactive process available to developers via the online '<a href="#">Healthy Place Making</a>' tool (development being led by Active Together and in partnership with Public Health) will be considered moving forwards.</p> <p>The Council has committed to working in partnership with Public Health to understand how the role of Health Impact Assessment can be strengthened and therefore this representation will also help to feed into the emerging policy in the Local Plan.</p>
<p>Pegasus Group on behalf of David Wilson Homes</p>	<p>29<sup>th</sup> October 2021</p>	<p><b>LOCAL SERVICES</b></p> <p><b>Car Parking/Electric Vehicle Car Parking</b></p> <p>In relation to electric vehicle charging, the Issues and Options document sets out a range of potential options in relation to the provision of electric vehicle charging points; with options</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and</p>

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		<p>for provision in all new homes, as well as an option requiring the provision of enabling infrastructure.</p> <p>The Government's preferred approach is the introduction of a new requirement for electric vehicle charging points under Part S of the Building Regulations to introduce a standardised approach. Once introduced, this would supercede the proposed policy approach in the Draft Plan. There is a risk that requirements for the installation of electric vehicle charging points could result in the installation of obsolete technology as the evolution of the technology is moving at pace. The policy should reference the installation of a charging point or cable routing to provide necessary flexibility in the nature of the provision. The potential option that requires provision of enabling infrastructure is therefore supported.</p>	<p>local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p>
<p>Pegasus Group on behalf of David Wilson Homes</p>	<p>29<sup>th</sup> October 2021</p>	<p><b>Community Facilities</b></p> <p>Policy 7 of the adopted Local Plan sets out the current policy position in relation to the provision of community facilities, and the consultation document acknowledges that this has been successful in ensuring the provision of community facilities.</p> <p>It is considered that it is only appropriate for large scale development to contribute towards community facility provision. The provision of community facilities on site should only be included within strategic developments, and for other development sites, offsite contributions to existing facilities are most appropriate.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p>

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Pegasus Group on behalf of David Wilson Homes	29 <sup>th</sup> October 2021	<p><b>MASTERPLANNING</b></p> <p><b>Large Scale Change and Place Making</b></p> <p>The consultation document sets out that the Council will require the production of masterplans, development briefs or other appropriate strategies in accordance with Policy 3. The consultation document proposes to carry forward the existing policy, and make the definition of 'large scale change' consistent with the definition of major development within Annex 2 of the NPPF, which for housing is 10 dwellings or more.</p> <p>Whilst the existing policy does not appear to define large scale change, it is considered that 100 dwellings or more is an appropriate quantum of development for large scale change. This should be defined within the new Local Plan.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>In the context of defining what constitutes '<i>large scale change</i>' the Council considers the definition of '<i>major development</i>' as per the National Planning Policy Framework (NPPF 2021), to be the benchmark for defining this Policy approach. The definition included in the NPPF is '<i>for housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development, it means additional floorspace of 1,000m<sup>2</sup> or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015</i>'.</p>
Pegasus Group on behalf of Davidsons Developments Limited	29 <sup>th</sup> October 2021	<p><b>West of Welford Road, Wigston – New Local Plan Regulation 18 Issues and Options Representations</b></p> <p>Thank you for the opportunity to respond to the Oadby and Wigston New Local Plan Issues and Options consultation. I write on behalf of Davidsons Developments Limited, in relation to land interests west of Welford Road, Wigston.</p>	<p>Noted.</p> <p>The Council would like to thank Pegasus Group on behalf of Davidsons Developments Limited for taking time to read through the consultation documents and for responding.</p>
Pegasus Group on	29 <sup>th</sup> October 2021	This submission is made in the context of Davidsons' land interests at Welford Road, Wigston. The site is identified as	Noted.

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behalf of Davidsons Developments Limited		WIG/001 within the Call for Sites: Sites Collation and Initial Assessment (Spring 2021). The site extends to approximately 3.4ha and is currently within agricultural use. The site is located immediately to the north and west of the allocated Wigston Direction for Growth, with existing and recent residential development located to the south and east, and with South Leicester Rugby Football Club located to the west and Wigston Cemetery to the north. The site lies adjacent to the existing Leicester Principal Urban Area (PUA). Initial site and masterplanning work has demonstrated that the site can accommodate some 85 dwellings, taking account of site constraints and opportunities, and making provision for necessary areas of public open space, children's play, drainage infrastructure and landscaping as part of the development proposals.	<p>The Local Plan will consider a variety of sites by size and location to determine the best options for delivering the Borough's housing requirement.</p> <p>All sites received to date via the Call for Sites process in 2020 and 2021 will be taken into account accordingly.</p>
Pegasus Group on behalf of Davidsons Developments Limited	29 <sup>th</sup> October 2021	<p><b>Overarching Policy Areas (Strategic Challenges)</b></p> <p><b>The Plan Period and Cooperation</b></p> <p>The consultation document confirms that the National Planning Policy Framework (NPPF) advises that strategic policies should extend over a 15 year period from the date of adoption. Paragraph 22 advises that "<i>strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure</i>". The consultation document proposes that the plan period should run until 2041. This approach</p>	Noted.

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		<p>is supported. The timetable for the New Local Plan anticipates Regulation 19 Pre-Submission consultation in Spring 2023, submission for Examination in June 2023, Hearing Sessions in August/September 2023, and Adoption in December 2023. The consultation document considers therefore that the lifespan of the Local Plan must run until at least 2038, however confirms that a plan period until 2041 will ensure a 15-year plan period in accordance with the NPPF, should there be any delays in preparation of the Local Plan, whilst also ensuring certainty and clarity for an extended period. The proposed end date of 2041 provides an appropriate long-term timeframe for strategic planning.</p>	
<p>Pegasus Group on behalf of Davidsons Developments Limited</p>	<p>29<sup>th</sup> October 2021</p>	<p><b>Where Should Development Go?</b></p> <p>The consultation document confirms that due to the nature of the Borough, there must be a focus on urban regeneration, however confirms that greenfield development will need to take place as there is not enough available land remaining within urban areas. The Council therefore sets out three potential options for the development strategy; concentrating new development within existing urban areas, and only then will greenfield land be used for development, focussing new development to the greenfield areas of the Borough, or finally, a balanced approach with a mix of urban development and greenfield land development. A balanced approach which seeks to utilise sites within existing urban areas, together with development on greenfield sites, is considered the most appropriate option in meeting housing needs.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>In the context of defining what constitutes '<i>large scale change</i>' the Council considers the definition of '<i>major development</i>' as per the National Planning Policy Framework (NPPF 2021), to be the benchmark for defining this Policy approach. The definition included in the NPPF is '<i>for housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development, it means additional floorspace of 1,000m<sup>2</sup> or more, or a site of 1 hectare or more, or as otherwise provided in the</i></p>

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		<p>The document asks whether all new development should incorporate an element of housing, shops, leisure and employment uses, or whether shops and employment should remain in designated areas such as town centres and identified employment areas. It is not considered necessary for all new development proposals to be delivered as mixed-use developments, however there may be an opportunity for larger residential sites to deliver some small scale uses (such as local retail and employment), as part of a mix of uses, in order to support new residents. Such an approach is only considered necessary on sites that are not already well related to the existing services and facilities available within the existing town and local centres.</p>	<p><i>Town and Country Planning (Development Management Procedure) (England) Order 2015</i>'.</p>
<p>Pegasus Group on behalf of Davidsons Developments Limited</p>	<p>29<sup>th</sup> October 2021</p>	<p><b>Strategic Housing (Strategic Challenges)</b></p> <p><b>Housing Need</b></p> <p>The standard method identifies a minimum annual housing need figure of 180 dwellings for Oadby and Wigston. The consultation document sets out three potential options for housing need for the Borough; the current housing requirement of 148 dwellings per annum, the standard method figure of 180 dwellings per annum, or await the outcome of the Housing and Employment Needs Assessment (HENA) before confirming housing need. The Planning Practice Guidance (PPG) clearly states that the standard method is the minimum starting point in determining the number of homes needed in an area. The PPG (Paragraph: 010 Reference ID: 2a-010-20201216) goes on to explain that circumstances may exist to</p>	<p>Noted.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>The Council will also undertake evidence gathering in terms of infrastructure and transport at a strategic and local level and the findings of these studies (and all evidence base) will inform policies related to housing and new development, including that related to the consideration and assessment of specific sites put forward for new growth</p>

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		<p>justify a figure higher than the local housing need, which may include, but are not limited to:</p> <p><i>"Situations where increases in housing need are likely to exceed past trends because of:</i></p> <ul style="list-style-type: none"> <li>- <i>growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);</i></li> <li>- <i>strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or</i></li> <li>- <i>an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground."</i></li> </ul> <p>The Council should therefore consider the standard method figure of 180 dwelling per annum as a starting point, and also whether there are circumstances that justify a housing requirement above the standard method. Should the Council consider that a housing need figure lower than the standard method figure is appropriate, it will need to be clearly demonstrated that there are significant constraints to development which justify a lower level of provision.</p>	<p>opportunities.</p> <p>As part of this work, the Council has already begun and will continue to regularly engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions will continue to take shape.</p> <p>For example, 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.</p> <p>The Local Plan will consider a variety of sites by size and location to determine the best options for delivering the Borough's housing requirement.</p> <p>All sites received to date via the Call for Sites process in 2020 and 2021 will be taken into account accordingly.</p>
Pegasus Group on behalf of Davidsons	29 <sup>th</sup> October 2021	<p><b>Housing Density</b></p> <p>Policy 12 of the adopted Local Plan sets out a minimum target density depending on the location of development, with 50</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations,</p>



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Developments Limited		<p>dwelling per hectare sought within town and district centre boundaries, 40 dwellings per hectare within the Leicester PUA and 30 dwellings per hectare within the remainder of the Borough. The policy advises that where independent viability appraisal or character and design appraisal demonstrate that the required density cannot be achieved, the Council will work with the applicant to ascertain whether there are alternative approaches. Paragraph 4.14 of the consultation document advises that the Council has been successful in achieving these minimum density targets, and therefore that they should be rolled forward to the new Local Plan. It is considered that 30 dwellings per hectare represents an appropriate density for residential development sites that are located outside but adjacent to the PUA. This approach is therefore supported.</p>	<p>policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p>
Pegasus Group on behalf of Davidsons Developments Limited	29 <sup>th</sup> October 2021	<p><b>Affordable Housing</b></p> <p>Policy 13 of the adopted Local Plan sets out a split target for affordable housing provision for the Borough of 30% for developments in Oadby, 20% in Wigston and 10% in South Wigston. Paragraph 4.19 of the consultation confirms that this approach is due to the vastly different land values in each of the areas. The Council is proposing to maintain the current split target, and is also assessing whether it would be appropriate to have a single Borough wide target. 20% affordable housing is considered appropriate for Wigston, it is important that the policy allows for issues of viability to be taken into account (as per the existing Policy 13).</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
			<p>shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects in relation to the need for Whole Plan and / or Affordable Housing Viability Assessment to inform the Council's Policy approach have been noted and will be considered accordingly.</p>
<p>Pegasus Group on behalf of Davidsons Developments Limited</p>	<p>29<sup>th</sup> October 2021</p>	<p><b>Older Persons Housing</b></p> <p>The consultation document sets out options for securing older persons accommodation in the Borough. The options considered are; all developments of 10 or more dwellings must provide homes for older persons accommodation, all developments of 10 or more dwellings will be encouraged to provide homes for older persons accommodation, or alternatively an off-site contribution from all sites of 10 dwellings or more.</p> <p>Paragraph 62 of the NPPF advises that "<i>the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)</i>". The provision of older persons housing should be encouraged within the New Local Plan, and the policy approach should be flexible rather than</p>	<p>Noted.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>In addition to this, the Council will also undertake a whole plan viability assessment, as well gather evidence for other aspects of the plan relating to infrastructure and housing choices. The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the emerging new Local Plan and by doing so, these discussions can begin to take place.</p> <p>With regards to the specific recommendations on where to locate older person housing, the comments will be considered accordingly as the</p>

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		<p>overly prescriptive. The policy approach should acknowledge that not all residential sites will be appropriately located within close proximity to facilities and services, and therefore it is not always appropriate to request provision on site. In order to meet the needs of older people, the Council should look to allocate sites for older person's accommodation that are within close proximity of public transport, local amenities and health services, which is often within or near to existing town centre.</p>	<p>preparation of the emerging new Local Plan document continues to progress.</p>
<p>Pegasus Group on behalf of Davidsons Developments Limited</p>	<p>29<sup>th</sup> October 2021</p>	<p><b>Green Infrastructure (Strategic Challenges)</b></p> <p><b>Countryside</b></p> <p>The Issues and Options Paper advises that it is paramount that the Council continues to protect the countryside areas in the Borough. In view of the scale of future housing needs over the period to 2041, the Council will need to consider the release of greenfield sites to meet its housing requirements. Land to the north of Newton Lane provides the opportunity for further residential development to meet housing needs without unacceptable landscape impacts.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>The Council will review all existing designations, including Countryside, as part of the emerging Local Plan.</p> <p>Therefore, this representation and the supporting submissions will be taken into account by the Council when reviewing the current Countryside Policy approach.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Pegasus Group on behalf of Davidsons Developments Limited	29 <sup>th</sup> October 2021	<p><b>Environment and Sustainability (Strategic Challenges)</b></p> <p><b>Habitats and Biodiversity</b></p> <p>The consultation document asks whether the Council should be making use of Natural England's Biodiversity Metric, or whether there are more appropriate ways of calculating biodiversity net gain. Natural England has recently released the Biodiversity Metric 3 and the Environment Bill sets out a requirement of biodiversity net gain. It is important that the new Local Plan is up to date with current and emerging national planning policy and guidance.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p> <p>With regards to the Policy approach on Geodiversity and Biodiversity, the Council is committed to working with Local Authorities in Leicester, Leicestershire and Rutland to develop up to date evidence and understanding of this complex and ever changing aspect of Plan making.</p>
Pegasus Group on behalf of Davidsons Developments Limited	29 <sup>th</sup> October 2021	<p><b>Infrastructure (Strategic Challenges)</b></p> <p><b>Highways Infrastructure Need</b></p> <p>The consultation document seeks feedback on transport and infrastructure requirements and how these should be secured through new development. It is considered that the new Local Plan should take opportunities to make housing allocations where there will not be unacceptable impact on highway safety or severe impacts on the highway network. Land west of Welford Road can be delivered without</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p>

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		<p>unacceptable impact on the transport network. The site is well located, with opportunities for sustainable travel modes, and is situated within a sustainable location within proximity of local facilities and service.</p> <p>It is important that new developments make appropriate contributions towards highway infrastructure solutions, and Davidsons Developments are happy to make any necessary contributions towards highway infrastructure, in consultation with the Local Highways Authority, where they are justified.</p>	<p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>Collaborative work on cross-boundary issues has also begun. Further discussions will be necessary between OWBC and neighbouring LPAs as their respective emerging new Local Plans progress.</p>
Pegasus Group on behalf of Davidsons Developments Limited	29 <sup>th</sup> October 2021	<p><b>Viability</b></p> <p>The consultation document seeks feedback on infrastructure and developer contributions, asking whether the current policy approach should be rolled forward, or whether a new approach taking account of the requirement to develop a Whole Plan Viability Assessment should be considered.</p> <p>Any policy in relation to infrastructure and developer contributions should reflect the approach set out within paragraphs 34 and 58 of the NPPF. Paragraph 34 advises that plans should set out the contributions expected from development, such as affordable housing and other infrastructure, and notes that such policies should not</p>	<p>Noted.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>In addition to this, the Council will also undertake a whole plan viability assessment, as well gather evidence for other aspects of the plan relating to infrastructure and housing choices. The Council will seek to engage and work in partnership with key</p>

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		<p>undermine the deliverability of the plan. Paragraph 58 confirms that all viability assessments, including those undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs. The approach to infrastructure and developer contributions should reflect the approach within the NPPF and PPG (Paragraph: 002 Reference ID: 10-002-20190509) and therefore a Whole Plan Viability Assessment is required to be undertaken.</p> <p>The new Local Plan should include housing allocations that do not require the provision of significant new infrastructure, and allocations should be made in suitable locations to ensure that proposed allocations are viable.</p>	<p>stakeholders over the course of the drafting the emerging new Local Plan and by doing so, these discussions can begin to take place.</p>
<p>Pegasus Group on behalf of Davidsons Developments Limited</p>	<p>29<sup>th</sup> October 2021</p>	<p><b>Housing (Local Challenges)</b></p> <p><b>Technical Housing Standards</b></p> <p>The consultation document sets out two potential options in relation to Technical Housing Standards; rolling forward the requirement to comply with the Governments Technical Housing Standards on all new homes provided through conversions, sub-divisions and/or changes of use, or requiring that all new homes comply with the Technical Housing Standards. The approach to requiring all new homes to comply with the Technical Housing Standards is not supported. Footnote 49 of the NPPF advises that <i>"planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing,</i></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
		<p><i>where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified". The Council's approach should recognise that an inflexible policy will impact on affordability and effect customer choice. Smaller dwellings play a valuable role in meeting specific needs for both open market and affordable home ownership housing. The PPG (Paragraph: 020 Reference ID: 56-020-20150327) sets out that "where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies. Authorities should take account of the following areas need, viability and timing" (ID: 56-020-20150327). The Council should provide a local assessment evidencing its case should this option be pursued.</i></p>	<p>shape.</p> <p>In addition to this, the Council will also ensure that a whole plan viability assessment is undertaken to evidence the emerging new Local Plan.</p>
Pegasus Group on behalf of Davidsons Developments Limited	29 <sup>th</sup> October 2021	<p><b>Self and Custom Build</b></p> <p>The policy approach within the current Local Plan seeks to support the provision of self build and custom build plots. The consultation document seeks feedback on whether this approach should be continued within the new Local Plan, or whether the policy approach should be strengthened to require self-build and custom build plots on all major development sites.</p> <p>There is no legislative or national policy basis for imposing an obligation on landowners or developers to include plots for self and custom build housing on major development sites. Paragraph 62 of the NPPF and the Self Build and Custom</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The specific examples referenced will also be taken into consideration as the preparation of the emerging new Local Plan document continues to progress.</p>

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		<p>Housebuilding Act 2015 confirm that it is the Council's responsibility to ensure that sufficient permissions are given to meet demand. The PPG (Paragraph: 025 Reference ID: 57-025-20210508) sets out ways in which the Council should consider supporting self and custom build by engaging with developers and encouraging the consideration of self and custom build, and facilitating access to those on the register, where the landowner is interested.</p> <p>As set out within the PPG (Paragraph: 011 Reference ID: 57-011-20210208) , the Council should use a Self-Build Register, supported by data from secondary sources, to understand and consider future need for this type of housing. It is important to note that whilst a Self-Build Register may indicate a level of expression of interest, it cannot be reliably translated into actual demand for such plots. The PPG advises that plan makers will need to make reasonable assumptions to avoid double counting.</p> <p>The issue of self and custom build units on larger developments was a matter addressed by the Inspector examining the Blaby Part 2 Local Plan. In this case the Inspector noted that whilst the Self-Build and Custom Build Register may indicate an interest in this type of housing, it was not clear how this evidence translated into actual demand, with potential issues of double counting where individuals register with more than one Council. In proposing a Modification to the plan to remove the requirement for self-build housing on</p>	



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		larger sites, the Inspector concluded that the requirement was not justified by the available evidence, there were potential viability issues and there may be negative consequences for the provision of affordable housing (paragraphs 73-79, Inspector's Report, Blaby Part 2 Local Plan, 21st December 2018).	
Pegasus Group on behalf of Davidsons Developments Limited	29 <sup>th</sup> October 2021	<p><b>Sustainable Homes</b></p> <p>The consultation document sets out several options for including measures to reduce greenhouse gases within the design of new homes, including solar panels, electric vehicle charging and air source heat pumps. As the evolution of such measures is moving quickly, it is considered that the most effective way in securing the provision of such measures should be through the building control process.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>
Pegasus Group on behalf of Davidsons Developments Limited	29 <sup>th</sup> October 2021	<p><b>Housing Choices</b></p> <p>Policy 11 of the current Local Plan sets out the policy position in relation to housing mix. The consultation document confirms that this approach has been successful in providing a wide range and choice of new homes and therefore the Council will look to continue this approach, with amendments to ensure that it is up to date with national and local policy and guidance. As the existing policy has been effective in ensuring the delivery of a mix of homes, this approach is considered appropriate for the Council to carry forward to the new Local Plan.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Pegasus Group on behalf of Davidsons Developments Limited	29 <sup>th</sup> October 2021	<p><b>Design and Character (Local Challenges)</b></p> <p><b>Design Codes</b></p> <p>The NPPF advises that local planning authorities should prepare design guides or codes that are consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences. The consultation document confirms that the Council will produce local design codes for the Borough, however, acknowledges that at this stage, there are no details in terms of number of design codes, what parts of the Borough they will relate to, or what level of detail they will include, however sets out that design codes will be produced in conformity with the National Model Design Code. The document sets out several potential options for the production of design codes. It is considered that local design codes should be high level documents, that are illustrative and less prescriptive; this approach will give a level of clarity and certainty, however, will also allow for a degree of flexibility.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>
Pegasus Group on behalf of Davidsons Developments Limited	29 <sup>th</sup> October 2021	<p><b>Renewable and Low Carbon Energy Production</b></p> <p>The consultation document sets out several options for new buildings to incorporate renewable and low carbon energy infrastructure. As the evolution of such measures is moving quickly, it is considered that the most effective way in securing the provision of such measures should be through the building control process.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The specific recommendation will be taken into consideration as the preparation of the emerging new Local Plan document continues to progress.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Pegasus Group on behalf of Davidsons Developments Limited	29 <sup>th</sup> October 2021	<p><b>Health and Wellbeing (Local Challenges)</b></p> <p><b>Open Space, Sport and Recreation Facilities</b></p> <p>The consultation document considers that the most suitable option is to carry forward the existing Local Plan Policy 9 into the new Local Plan. The document acknowledges that the current policy approach has been effective and therefore the Council propose to review and update the evidence base to ensure that all necessary infrastructure can be delivered in order to support the planned level of growth to 2041. This approach is supported.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>
Pegasus Group on behalf of Davidsons Developments Limited	29 <sup>th</sup> October 2021	<p><b>Health Impact Assessments</b></p> <p>Policy 5 requires all major development proposals to be accompanied by a Health Impact Assessment screening statement, to consider the potential impact and demands of the development proposal upon existing services and facilities. Potential options consider continuing with this approach and continuing to work with all relevant stakeholders, through the Local Plan and planning application processes. This approach is supported.</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>There is now an interactive process available to developers via the online <a href="#">‘Healthy Place Making’</a></p>

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			<p>tool (development being led by Active Together and in partnership with Public Health) will be considered moving forwards.</p> <p>The Council has committed to working in partnership with Public Health to understand how the role of Health Impact Assessment can be strengthened and therefore this representation will also help to feed into the emerging policy in the Local Plan.</p>
Pegasus Group on behalf of Davidsons Developments Limited	29 <sup>th</sup> October 2021	<p><b>Local Services (Local Challenges)</b></p> <p><b>Car Parking/Electric Vehicle Car Parking</b></p> <p>The consultation document sets out a range of potential options in relation to the provision of electric vehicle charging points; with options for provision in all new homes, as well as an option requiring the provision of enabling infrastructure.</p> <p>The Government's preferred approach is the introduction of a new requirement for electric vehicle charging points under Part S of the Building Regulations to introduce a standardised approach. Once introduced, this would supersede the proposed policy approach in the emerging Local Plan. There is a risk that requirements for the installation of electric vehicle charging points could result in the installation of obsolete technology as the evolution of the technology is moving at pace. The policy should reference the installation of a charging</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The specific recommendation will be taken into consideration as the preparation of the emerging new Local Plan document continues to progress.</p>

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		point or cable routing to provide necessary flexibility in the nature of the provision. The potential option that requires provision of enabling infrastructure is therefore supported.	
Pegasus Group on behalf of Davidsons Developments Limited	29 <sup>th</sup> October 2021	<p><b>Community Facilities</b></p> <p>Policy 7 of the adopted Local Plan sets out the current policy position in relation to the provision of community facilities, and the consultation document acknowledges that this has been successful in ensuring the provision of community facilities. Other potential options are to require all development to contribute towards community facilities provision, and alternatively, requiring only large scale development to contribute. Elsewhere within the consultation document, large scale provision is referenced as major development proposals (10 dwellings and over) in accordance with the glossary of the NPPF. It is considered that it is only appropriate for large scale development to contribute towards community facility provision. The provision of community facilities on site should only be included within strategic developments, and for other development sites, offsite contributions to existing facilities are most appropriate.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The specific recommendation will be taken into consideration as the preparation of the emerging new Local Plan document continues to progress.</p>
Pegasus Group on behalf of Davidsons Developments Limited	29 <sup>th</sup> October 2021	<p><b>Masterplanning (Local Challenges)</b></p> <p><b>Large Scale Change and Place Making</b></p> <p>The consultation document sets out that the Council will require the production of masterplans, development briefs or other appropriate strategies in accordance with Policy</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>In the context of defining what constitutes <i>'large</i></p>

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		<p>3. The consultation document proposes to carry forward the existing policy, and make the definition of 'large scale change' consistent with the definition of major development within Annex 2 of the NPPF, which for housing is 10 dwellings or more. Whilst the existing policy does not appear to define large scale change, it is considered that 100 dwellings or more is an appropriate quantum of development for large scale change. This should be defined within the new Local Plan.</p>	<p><i>scale change</i>' the Council considers the definition of 'major development' as per the National Planning Policy Framework (NPPF 2021), to be the benchmark for defining this Policy approach. The definition included in the NPPF is <i>'for housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development, it means additional floorspace of 1,000m2 or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015'</i>.</p>
<p>Pegasus Group on behalf of Mulberry Land</p>	<p>29<sup>th</sup> October 2021</p>	<p><b>1. INTRODUCTION</b></p> <p><b>1.1 Representations</b></p> <p>1.1.1 Pegasus Group welcomes the opportunity to submit representations to the Oadby and Wigston Borough New Local Plan Issues &amp; Options consultation. These representations are made on behalf of Mulberry Land and relate to the proposed residential development of land at Oadby Grange, Oadby.</p>	<p>Noted.</p> <p>The Council would like to thank Pegasus Group for taking time to read through the consultation documents and for responding to the consultation on behalf of Mulberry Land.</p> <p>The Local Plan will consider a variety of sites by size and location to determine the best options for delivering the Borough's housing requirement.</p> <p>All sites received to date via the Call for Sites process in 2020 and 2021 will be taken into account accordingly. Please note that the submitted Site Deliverability Document will also be taken into consideration as part of this process.</p>

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Pegasus Group on behalf of Mulberry Land	29 <sup>th</sup> October 2021	<p><b>2. CONTEXT AND TIMETABLE</b></p> <p><b>2.1 Context</b></p> <p>2.1.1 The current Borough of Oadby and Wigston Local Plan was adopted in April 2019, following Submission in January 2018 and subsequent Examination in Public. The current adopted Plan is for the period 2011 to 2031, meaning there is now less than 9 years before the end of the Plan period.</p> <p>2.1.2 Our clients welcome and support the commitment of the Borough Council to the review of the Local Plan.</p>	Noted.
Pegasus Group on behalf of Mulberry Land	29 <sup>th</sup> October 2021	<p><b>2.2 Timetable for Production</b></p> <p>2.2.1 The timetable to produce the New Local Plan is outlined in the updated Borough's Local Development Scheme published in July 2021. It is noted the intention is to submit the Plan in June 2023 and adopt in December 2023.</p> <p>2.2.2 Our clients welcome the Council's ambition to adopt the new Local Plan by December 2023. However, the proposed adoption date of December 2023 would be 56 months from the adoption of the current Plan. This is significantly longer than that proposed in the Planning White Paper (Planning for the Future. August 2020. Page 41) for the production of local plans at 42 weeks for those LPAs with Plans adopted within 3 years. It is also noted the timetable has already slipped by 1 month.</p>	Noted.

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		2.2.3 Our clients are happy to assist the Council in the timely progression of the Local Plan Review.	
Pegasus Group on behalf of Mulberry Land	29 <sup>th</sup> October 2021	<p><b>3. OVERARCHING POLICY AREAS (I&amp;O PART 2)</b></p> <p><b>3.1 Plan Period</b></p> <p>3.1.1 The National Planning Policy Framework (NPPF) at paragraph 22 states:</p> <p><i>“Strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. 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 within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.”</i></p> <p>3.1.2 The I&amp;O Paper proposes the new Local Plan has a period that runs to 2041, resulting in an anticipated period from adoption of just over 17 years.</p> <p><i>‘This will ensure that, should Plan preparation slip for any reason, the Plan at adoption will still have at least a 15 year lifespan. It also ensures further certainty and clarity for an extended period’.</i> (I&amp;O Paper paragraph 4.6)</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The specific recommendation that the Local Plan should contain policies that enable the longer-term strategy for growth to 2050 as set out in the SGP in accordance with paragraph 22 of the NPPF will be taken into consideration as the preparation of the emerging new Local Plan document continues to progress.</p>



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		<p>3.1.3 Furthermore, the Paper points out that the strategic evidence being produced by Leicester and the Leicestershire Councils covers the time period to 2041.</p> <p>3.1.4 The Leicester and Leicestershire Strategic Growth Plan (SGP) was jointly prepared and published in December 2018 by the eight local authorities in Leicester and Leicestershire, Leicestershire County Council and the Leicester and Leicestershire Enterprise Partnership. The SGP sets out a longer-term strategy and aspirations for delivering growth and development in the Leicester and Leicestershire Housing Market Area (HMA) up to the year 2050. It is a non-statutory strategic plan that provides a framework to guide individual Local Plans.</p> <p>3.1.5 The SGP identifies the A46 as a growth corridor at which Oadby lies at the heart, based around the A46 Expressway proposal in the Midland Connect Strategy.</p> <p><i>'We estimate that this corridor has the potential to accommodate about 38,000 new homes and additional new jobs'. (SGP page 23)</i></p> <p>3.1.6 However, in November 2020 Midland Connect withdrew support for the Expressway (A46 Stage Two Technical Study, Midland Connect):</p> <p><i>'Midlands Connect highlight that new road infrastructure is needed south and east of Leicester to support growth, but confirms a road to 'Expressway' standard is not required for</i></p>	

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		<p><i>people making long distance trips past Leicester. Further work is therefore recommended to better understand what infrastructure and sustainable transport interventions may be needed to support planned growth and mitigate any adverse impacts on existing urban areas and their associated transport networks. This work will be carried out by the Leicester and Leicestershire Authorities in collaboration with Midlands Connect’.</i></p> <p>3.1.7 However, the FAQ note (Midlands Connect A46 (Stage 2) Study – FAQs (November 2020) goes onto say:</p> <p>‘We do not need to abandon the Strategic Growth Plan and start again. The work of Midlands Connect does not recommend or support a departure from the distribution of growth set out in the Strategic Growth Plan – it was not the purpose of the study to consider this. Midlands Connect’s approach and findings support the distribution of growth envisaged in the Strategic Growth Plan.</p> <p>Will the Strategic Growth Plan be updated? No, not at present. The A46 (Stage 2) Study does not support the redistribution of growth away from what is proposed in the Strategic Growth Plan, simply that a road to Expressway Standard is not needed for long distance trips. 7. Does the Midlands Connect A46 (Stage 2) Study impact the number of new homes needed? No. Government set the targets for the overall number of homes we have to provide, and the A46 (Stage 2) Study does not support the redistribution of housing away from what is proposed in the Strategic Growth Plan. In Leicester &amp;</p>	

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		<p>Leicestershire we've still got to provide 140,000 new homes over the next 30 years. This is a huge challenge and one there are no easy answers to. We will need a significant package of sustainable transport measures and new infrastructure to support this level of growth, whilst meeting essential air quality and carbon reduction targets'.</p> <p>3.1.8 Whilst a Plan to 2041 is a pragmatic approach, it should contain policies that enable the longer-term strategy for growth to 2050 as set out in the SGP in accordance with paragraph 22 of the NPPF. Practically, the Plan could contain detail policies to 2041, including site allocations for housing, employment and other uses, set within the context of the Vision and Strategy to 2050, augmented by policies for enabling infrastructure and longer-term broad areas of growth.</p>	
Pegasus Group on behalf of Mulberry Land	29 <sup>th</sup> October 2021	<p><b>3.2 Duty to Co-operate</b></p> <p>3.2.1 Our clients support the Council's commitment to the Duty to Co-operate. The Council is reminded that in accordance with paragraph 27 of the NPPF, Statements of Common Ground should be made publicly available throughout the plan-making process to provide transparency.</p> <p>3.2.2 It is noted that a Statement of Common Ground between Leicester City Council the Leicestershire Authorities relating to housing and employment land needs was published in March 2021. This confirms that Leicester City Council is the only authority to declare an unmet need at present. Based on a</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p>

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		<p>theoretical capacity and the Government’s standard methodology for assessing housing need, the scale of that unmet need is 16,735 for the period 2020-2036.</p> <p>3.2.3 Given the scale of this unmet need from the City of Leicester all opportunities for meeting that need should be explored, particularly within Oadby and Wigston which is well related to Leicester in respect of sustainable commuting. Our client’s site at Oadby Grange could contribute to meeting that need.</p>	<p>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.</p>
<p>Pegasus Group on behalf of Mulberry Land</p>	<p>29<sup>th</sup> October 2021</p>	<p><b>3.3 Where should development go?</b></p> <p>3.3.1 Our clients are generally supportive of the Council’s approach to identifying a range of sites to meet the identified need including greenfield and brownfield sites. However, in selecting sites, particular attention should be made to deliverability of sites for years one to five of the plan period in accordance with paragraph 68 of the NPPF. Our client’s site at Oadby Grange is one such site that would fulfil this criterion. Indeed, our clients are keen to bring the site forward at the earliest opportunity in order to deliver housing and other tangible benefits sooner rather than later.</p> <p><b>Land at Oadby Grange</b></p> <p>3.3.2 The site at Oadby Grange was submitted in response to the Borough’s ‘Call for Sites’ in November 2020 and is identified as site reference OAD/006 in the Council’s Sites Collation and Initial Assessment (SCIA), Spring 2021.</p>	<p>Noted.</p> <p>All sites received to date via the Call for Sites process in 2020 and 2021 will be taken into account accordingly.</p> <p>The Council are currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing, including that related to the consideration and assessment of specific sites put forward for new growth opportunities.</p> <p>As part of this work, the Council has already and will continue to seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions will continue to take shape.</p>

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		<p>3.3.3 In total, the Council received 16 site submissions, of which 13 included residential proposals. The sum of sites submitted would have capacity to accommodate approximately 2,976 to 3,920 dwellings based on the information supplied through the Call for Sites. The SCIA indicates that all the submitted sites will be assessed further through the Local Plan process.</p> <p>3.3.4 The site at Oadby Grange is located on the eastern edge of Oadby. The site has the potential to provide a logical extension to the urban area, rounding off the settlement edge. The site extends to approximately 22.9ha and could provide for a development of approximately 300–330 homes, including affordable housing, in a sustainable and accessible location. As part of the development proposal approximately 11.5ha of open space would be provided (50% of the site area) including the retention and significant enhancement of the existing Country Park as a resource for existing and future residents in the area.</p> <p>3.3.5 The site comprises a series of agricultural fields that abut existing residential development on two sides (to the south and west). The site is also well contained by existing trees and hedgerows which define the northern and eastern boundaries and form part of the Oadby Grange Country Park. There are hedgerows and groups of trees within the site that are concentrated along the edges of the fields.</p>	

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		<p>3.3.6 The site is under contract with Mulberry Land. The landowner is fully committed to the early delivery of residential development on the site and there are no known legal issues that would prevent the delivery of the site moving forward. The site is capable of being quickly developed following the grant of satisfactory planning permission and could contribute to housing supply in Oadby and Leicester in the short term. The Oadby Grange proposal is therefore achievable for residential development.</p> <p>3.3.7 In respect of Site OAD/006 the SCIA identifies the following Local Policy designation to be relevant at this stage:</p> <ul style="list-style-type: none"> <li>• Local Plan Policy 43: Countryside</li> </ul> <p>3.3.8 For sites OAD/001, OAD/005, OAD/007, WIG/003, WIG/004, and WIG/006 the SCIA identifies the following Local Policy designation as being relevant:</p> <ul style="list-style-type: none"> <li>• Local Plan Policy 42: Green Wedges</li> </ul> <p>3.3.9 However, it is acknowledged that the Policy designation may change through the review of the Local Plan.</p> <p>3.3.10 The SCIA explains that sites submitted through the 2020 Call for Sites will be taken into account as part of the Council's 2020-21 Strategic Housing and Economic Development Land Availability Assessments (SHELAA), likely to be published in Spring / Summer 2021. However, the recently published 2021 SHLAA does not include sites</p>	

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		<p>submitted in 2020, but instead states that all sites received as part of the recent Call for Sites consultation will be considered as part of the Local Plan preparation process. The process for assessment of sites is therefore unclear at this stage, and clarification is sought from the Council.</p> <p>3.3.11 Analysis that was undertaken in support of the Call for Sites submission demonstrates that there are many merits to the site at Oadby Grange being allocated for residential development. These include, inter alia:</p> <ul style="list-style-type: none"> <li>• the site is located immediately adjacent to Oadby, one of the principal towns in the Borough,</li> <li>• it is well related to the built-up area and would represent a logical rounding off for the settlement edge,</li> <li>• it is accessible to local shops and services and is also accessible by public transport,</li> <li>• suitable vehicular access can be achieved,</li> <li>• there are no statutory landscape, ecology or heritage designations that affect the site,</li> <li>• the site is not constrained by flooding and is located in Flood Zone 1, and</li> <li>• the site is well contained by existing trees and hedges which could help mitigate the visual impact of built development when viewed from the wider countryside.</li> </ul> <p>3.3.12 The site is also not the subject of key constraints such as:</p> <ul style="list-style-type: none"> <li>• Green Belt</li> </ul>	

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		<ul style="list-style-type: none"> <li>• Area of Outstanding Natural Beauty (AONB)</li> <li>• Green Wedge</li> <li>• SSSI</li> <li>• Conservation Area</li> <li>• Scheduled Ancient Monument or Listed Buildings</li> <li>• Flood Zone 2 or 3 (high risk of flooding)</li> <li>• Local Green Space</li> </ul> <p>3.3.13 The site has been the subject of an initial landscape assessment which concludes the site is capable of development without any significant and demonstrable harm to the landscape or visual amenities of the area.</p> <p>3.3.14 My clients are looking to bring the site forward as early as possible. Not only would it supplement the housing land supply but it will also secure other important benefits (some of which we expand upon later in these representations), in terms of:-</p> <ul style="list-style-type: none"> <li>• Early delivery of an enhanced Country Park including biodiversity enhancements and long term management. This has been a long held aspiration in the area.</li> <li>• A front runner site for the delivery of First Homes</li> <li>• An opportunity for a meaningful provision of homes for the elderly which can be master planned as part of the wider development.</li> </ul> <p>3.3.15 In conclusion, the allocation of this site for housing would assist in meeting the housing needs of the Borough on</p>	



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		a site which is well located and accessible to local facilities and without resulting in any significant harm to interests of acknowledged importance.	
Pegasus Group on behalf of Mulberry Land	29 <sup>th</sup> October 2021	<p><b>4. HOUSING (STRATEGIC CHALLENGES (I&amp;O PART 3))</b></p> <p><b>4.1 Housing Need</b></p> <p>4.1.1 Paragraph 11b of the NPPF states:</p> <p><i>Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:</i></p> <p><i>i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or</i></p> <p><i>ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.</i></p> <p>4.1.2 The Council's current Local Plan sets out a housing requirement of 148 new homes per year within the Borough area. Using the Government's standard method for calculating housing need, the need for the Borough area is 180 new homes per year. There also may be a requirement to accommodate unmet housing need arising from the City of Leicester. In the I&amp;O paper the Council state:</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>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.</p>

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		<p><i>'Due to the nature of the Borough area, it is not expected that any of Leicester City's unmet need could be provided within the Borough area, however this has yet to be determined'.</i></p> <p>4.1.3 The issue of accommodating another LPAs unmet need must be thoroughly tested through the Duty to Co-operate process and should not be predetermined.</p> <p>4.1.4 Paragraph 61 of the NPPF states:</p> <p><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 – <u>unless exceptional circumstances</u> justify an alternative approach which also reflects current and future demographic trends and market signals. (Emphasis added)</i></p> <p>4.1.5 Similarly, Planning Practice Guidance states:</p> <p><i>Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination. (Paragraph 2a-015)</i></p>	

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		<p>4.1.6 At present there is no evidence of exceptional circumstances to justify a lower housing need figure. The Council in the I&amp;O Paper refers to:</p> <p><i>'Any further increase to the current housing requirement figure will significantly impact the Council's ability to meet its need, as well as significantly impact the Borough areas green open areas. In addition, assessment work relating to highway capacity and infrastructure would need to evidence that the levels of growth required could be accommodated on an already congested highway infrastructure network.'</i></p> <p>4.1.7 These factors are not exceptional circumstances to justify a lower housing need figure, rather they are considerations to be made in how that need may be accommodated.</p> <p>4.1.8 Should it prove not possible to fully accommodate the housing need within the Borough, then in accordance with the NPPF that need should be met in neighbouring areas through the Duty to Co-operate process.</p>	
Pegasus Group on behalf of Mulberry Land	29 <sup>th</sup> October 2021	<p><b>4.2 Housing Density</b></p> <p>4.2.1 The Council's current Local Plan sets out a split minimum density target depending on the location of development, of between 30 and 50 dwellings per hectare. The current policy includes an important caveat:</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and</p>

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		<p>‘Where a development is otherwise acceptable but an independent viability appraisal and / or an independent character and design appraisal demonstrates that the required density cannot be achieved, the Council will work with the applicant to ascertain whether there are alternative approaches. If the Council requires its own independent viability assessments to verify outcomes of the applicant’s assessment, it will be at the applicants cost’.</p> <p>4.2.2 The I&amp;O Paper indicates the Council’s preferred option is to roll forward the current policy with minor word amendments.</p> <p>4.2.3 Our clients would support a more flexible approach to housing density that recognises the site-specific place-making opportunities on a case-by-case basis. Such site considerations are, but not limited to, provision of open space, SuDs, other uses including community facilities, and the consideration of heritage and landscape assets. If density targets are rolled forward, they should be indicative for the different policy areas.</p> <p>A single density target across the Borough is not supported.</p>	<p>local level. This new evidence will help to inform the Council’s Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>The specific statement that a single density target across the Borough is not supported has been noted and will be considered according as the preparation of the emerging new Local Plan document continues to progress.</p>
Pegasus Group on behalf of Mulberry Land	29 <sup>th</sup> October 2021	<p><b>4.3 Affordable Housing</b></p> <p>4.3.1 The Council’s current Local Plan, at Policy 13, sets out a split target for affordable housing provision depending on the developments location, mainly on the basis of land values.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering</p>

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		<p>4.3.2 Any amendment to the Policy will need to be evidenced through the update to the Housing and Employment Needs Assessment (HENA) and tested through the whole Plan Viability Assessment. Until that work is complete it is difficult to give a view on the appropriate level of affordable housing provision.</p>	<p>as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The Whole Plan and / or Affordable Housing Viability Assessment will be used to inform the Council's Policy approach and this comment will be considered accordingly.</p>
Pegasus Group on behalf of Mulberry Land	29 <sup>th</sup> October 2021	<p><b>4.4 Older persons housing</b></p> <p>4.4.1 The need to provide housing for older people is critical (PPG paragraph 63-001). Within the context of the NPPF (Paragraph 62) and a likely significant increase in the numbers of people within the over 65 age group, the Council seeks to provide more older persons housing (and / or accommodation) within the new Local Plan. Our clients are supportive of this objective.</p> <p>4.4.2 The I&amp;O Paper proposes various options including that large residential proposals provide homes and / or accommodation for the Borough's older population.</p>	<p>Noted.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>In addition to this, the Council will also undertake a whole plan viability assessment, as well gather evidence for other aspects of the plan relating to infrastructure and housing choices. The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the</p>

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		<p>4.4.3 Planning Practice Guidance provides examples of different types of specialist housing for older people (paragraph 63-011). Furthermore, it goes on to say:</p> <p><i>Plan-makers will therefore need to identify the role that general housing may play as part of their assessment. Plan-makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish. (63-012)</i></p> <p>4.4.4 Therefore, to meet the objective of providing more homes for older persons a variety of products will be required. These should be on a case-by-case basis depending on location and scale. A policy that simply requires the provision of older persons accommodation on large sites may result in the wrong time of housing in the wrong place. Much of the older persons accommodation needs can be met through adaptive housing enabling residents to remain in their homes as their needs change.</p> <p>4.4.5 Our clients recognise the need to provide for the older sections of the community and through the site at Oadby Grange they could deliver a range of suitable accommodation including homes for the elderly such as extra care housing and other typologies.</p> <p>4.4.6 This can be master planned into the wider development to create a more inclusive community. The site is capable of</p>	<p>emerging new Local Plan and by doing so, these discussions can begin to take place.</p> <p>With regards to the specific recommendations on where to locate older person housing, the comments will be considered accordingly as the preparation of the emerging new Local Plan document continues to progress.</p>

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		early delivery and could make a meaningful contribution to meeting the objective of providing more older persons housing early in the Plan period.	
Pegasus Group on behalf of Mulberry Land	29 <sup>th</sup> October 2021	<p><b>5. GREEN INFRASTRUCTURE (STRATEGIC CHALLENGES) (I&amp;O PART 6)</b></p> <p><b>5.1 Green Infrastructure</b></p> <p>5.1.1 The Council's current Local Plan Policy 8 Green Infrastructure seeks a net gain in Green Infrastructure through the preservation and enhancement of open spaces and assets that comprise the Borough's Green Infrastructure and its network. The Council have indicated they will continue to maintain the current policy position in relation to Green Infrastructure in the new Local Plan. Our clients would broadly support that approach.</p>	Noted.
Pegasus Group on behalf of Mulberry Land	29 <sup>th</sup> October 2021	<p><b>5.2 Green wedges</b></p> <p>5.2.1 It is expected that the Council will continue to maintain the green wedge designations within the Borough area through retaining related planning policy set out in the new Local Plan. As yet a decision has not been made to undertake a Green Wedge Review. Should such a review be undertaken it should be in the context of meeting the Borough's housing needs. Given the anticipated level of need it is unlikely that creation of new green wedges or expanded boundaries will be justified.</p>	<p>Noted.</p> <p>The Council will test various options during the course of preparing the Local Plan. A review of Green Wedges will be undertaken in the course of preparing the emerging new Local Plan.</p>

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		<p>5.2.2 It has previously been indicated by officers that green wedges have less protection than generic countryside policies. However, this is counter-intuitive as green wedges perform a specific function as set out in the Adopted Local Plan:</p> <p><i>'The purpose of the Green Wedges situated within the Borough is to protect important areas of open land which influence development form and have a positive effect on people's health and well being'. (paragraph 10.6.1)</i></p> <p><i>'Green Wedges are extremely important; they play major roles in shaping the character of the environment and help stimulate leisure and tourism whilst improving residents and visitors quality of life'. (paragraph 10.6.5)</i></p> <p><i>'As well as guiding development form and effecting residents positively, Green Wedges are key green areas within the Borough's Green Infrastructure network and support the Borough's biodiversity. The Green Wedges within the Borough act as important strategic green infrastructure corridors linking green areas within the urban area to the countryside as well as other key strategic green infrastructure corridors such as the Grand Union Canal and railway corridors'. (paragraph 10.6.6)</i></p> <p>5.2.3 Our client's site at Oadby Grange is not within a green wedge. It therefore would not undermine these policy objectives and should be considered sequentially preferable to potential sites that are located within the green wedges.</p>	



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Pegasus Group on behalf of Mulberry Land	29 <sup>th</sup> October 2021	<p><b>5.3 Countryside</b></p> <p>5.3.1 The Council is proposing to roll forward the current planning policy which seeks to protect the designated countryside areas of the Borough from inappropriate and unsustainable growth and development.</p> <p>5.3.2 Those sites currently designated countryside will be required to be amended should they be allocated for development in the Plan.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>The Council will review all existing designations, including Countryside, as part of the emerging Local Plan.</p>
Pegasus Group on behalf of Mulberry Land	29 <sup>th</sup> October 2021	<p><b>5.4 Flood Risk</b></p> <p>5.4.1 At the least, a partial review of the SFRA will be required to be in accord with the latest NPPF and Planning Practice Guidance, including the Environment Agency advice on climate change allowances (Peak river flow climate change allowances by management catchment, published July 2021).</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p>
Pegasus Group on behalf of	29 <sup>th</sup> October 2021	<p><b>6. ENVIRONMENT AND SUSTAINABILITY (STRATEGIC CHALLENGES) I&amp;O PART 7</b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance</p>

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Mulberry Land		<p><b>6.1 Climate change</b></p> <p>6.1.1 The Council has a current Policy in the Local Plan relating to Climate Change, Flood Risk and Renewable Low Carbon Energy (Policy 38) that requires all development proposals to make use of sustainable resources and reduce their impact upon climate change by meeting high standards of sustainable design and construction. In addition, for all major developments, applications must be accompanied by a Sustainability / Energy Statement, demonstrating how harmful emissions will be addressed and minimised.</p> <p>6.1.2 Should the Council choose to set energy performance standards for new housing these will be required to be tested through the whole plan viability assessment.</p> <p>6.1.3 Our clients broadly support the policy being rolled forward and updated to be in accordance national planning policy and guidance. Mulberry Homes have launched ‘The Mulberry Way’, a range of cutting-edge initiatives, developed over the last 18 months, that reflect the developer’s commitment to sustainable, ethical and community-centred practices.</p>	<p>with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p>
Pegasus Group on behalf of Mulberry Land	29 <sup>th</sup> October 2021	<p><b>7. INFRASTRUCTURE (STRATEGIC CHALLENGES) I&amp;O PART 8</b></p> <p><b>7.1 Developer Contributions (including transport requirements)</b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>

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		<p>7.1.1 The Council is respectively reminded Planning Obligations must be necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development (PPG -Paragraph 23b-002).</p> <p>7.1.2 Paragraph 55 of the National Planning Policy Framework makes clear that planning conditions should be kept to a minimum, and only used where they satisfy the following tests; necessary; relevant to planning, relevant to the development to be permitted, enforceable, precise, and reasonable in all other respects.</p> <p>7.1.3 Development should not be prevented from coming forward simply through lack of capacity, rather the infrastructure should be provided to enable or mitigate the impact of the development informed by the Infrastructure Funding Statement, and where appropriate through developer contributions.</p>	<p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>In addition to this, the Council will also undertake a whole plan viability assessment, as well gather evidence for other aspects of the plan relating to infrastructure, housing and economic development choices. The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the emerging new Local Plan.</p>
Pegasus Group on behalf of Mulberry Land	29 <sup>th</sup> October 2021	<p><b>7.2 Viability</b></p> <p>7.2.1 Planning Practice Guidance states:</p> <p><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> (10-002)</p>	<p>Noted.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>In addition to this, the Council will also undertake a</p>

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		<p><i>Plan makers should engage with landowners, developers, and infrastructure and affordable housing providers to secure evidence on costs and values to inform viability assessment at the plan making stage. (10-006)</i></p> <p>7.2.2 Or clients look forward to engagement with the Council on these matters.</p>	<p>whole plan viability assessment, as well gather evidence for other aspects of the plan relating to infrastructure and housing choices. The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the emerging new Local Plan and by doing so, these discussions can begin to take place.</p>
Pegasus Group on behalf of Mulberry Land	29 <sup>th</sup> October 2021	<p><b>7.3 High quality communications</b></p> <p>7.3.1 At present the provision of 5G phone service and / or high speed fibre broadband is the responsibility of service providers not the developer. In March 2020 Digital Secretary Oliver Dowden announced the government will legislate to make sure new-build homes come with gigabit-speed broadband fit for the future (Press release: New-build homes to come gigabit-speed ready (17 March 2020)). The Local Plan should not run ahead of such legislation.</p>	Noted.
Pegasus Group on behalf of Mulberry Land	29 <sup>th</sup> October 2021	<p><b>7.4 Education</b></p> <p>7.4.1 All development proposals, regardless of size, should contribute towards delivery of educational infrastructure where necessary in accordance with national policy and guidance including reference to:</p> <ul style="list-style-type: none"> <li>• the education needs arising from development, based on an up-to date pupil yield factor,</li> </ul>	Noted.

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		<ul style="list-style-type: none"> <li>• the capacity of existing schools that will serve development, taking account of pupil migration across planning areas and local authority boundaries,</li> <li>• available sources of funding to increase capacity where required, and</li> <li>• the extent to which developer contributions are required and the degree of certainty that these will be secured at the appropriate time.</li> </ul>	
Pegasus Group on behalf of Mulberry Land	29 <sup>th</sup> October 2021	<p><b>8. HOUSING (LOCAL CHALLENGES) I&amp;O PART 9</b></p> <p><b>8.1 First Homes</b></p> <p>8.1.1 It is noted that it is not currently expected that the Council will increase the level of discount from the 30 per cent required by Government. Any higher level of discount must be robustly demonstrated.</p> <p>8.1.2 Notwithstanding the above, Mulberry Homes are supportive of the First Homes Scheme and already delivering First Homes in the Region. The site at Oadby Grange would present an opportunity for a significant early delivery of First Homes in the Borough.</p> <p>8.1.3 This is unlikely to be delivered on existing committed sites because they will have been brought forward under a different policy basis. The delivery of First Homes is therefore dependent upon the early release of new suitable sites. Oadby Grange is an obvious opportunity.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p>

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Pegasus Group on behalf of Mulberry Land	29 <sup>th</sup> October 2021	<p><b>8.2 Technical housing standards</b></p> <p>8.2.1 Mulberry Homes are supportive of meeting the technical standards and would apply these to the development at Oadby Grange. The company has been reviewing its house types in order to comply with this standard.</p>	Noted.
Pegasus Group on behalf of Mulberry Land	29 <sup>th</sup> October 2021	<p><b>9. DESIGN AND CHARACTER (LOCAL CHALLENGES) I&amp;O PART 10</b></p> <p><b>9.1 High quality design</b></p> <p>9.1.1 Our clients support the objective of good design. Mulberry Homes take pride in ensuring each scheme embeds the character of the locality to develop homes that are in keeping with any distinctive local character design principles.</p>	Noted.
Pegasus Group on behalf of Mulberry Land	29 <sup>th</sup> October 2021	<p><b>9.2 High quality construction and use of materials</b></p> <p>9.2.1 Any proposal to require all new development to make use of the highest quality methods of construction and use the highest quality materials will be required to be tested through the whole plan viability assessment. It is unclear what parameters will be used to assess high quality construction and use of materials. That said, Mulberry Homes pride themselves on the use of exceptional quality materials and construction standards and would deliver such homes at Oadby Grange.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will undertake a whole plan viability assessment, as well gather evidence for other aspects of the plan relating to infrastructure, housing and economic development choices. The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the emerging new Local Plan.</p>

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Pegasus Group on behalf of Mulberry Land	29 <sup>th</sup> October 2021	<p><b>9.3 Local Green Spaces</b></p> <p>9.3.1 Any review of Local Green Spaces should take account of paragraphs 101 and 102 of the NPPF. In designating land as Local Green Space they should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. In this respect we refer you to paragraph 11b of the NPPF.</p>	<p>Noted.</p> <p>The specific references to the NPPF have been noted and will be considered accordingly and the emerging New Local Plan continues to be prepared.</p>
Pegasus Group on behalf of Mulberry Land	29 <sup>th</sup> October 2021	<p><b>9.4 Renewable and low carbon energy production</b></p> <p>9.4.1 Our clients are supportive of measures to address climate change but consider such matters would be more effectively through amendments to building regulations and national policy rather than through individual local plans. Local standards lead to a disjointed approach to this important issue and often have unintended implications for viability when combined with all other Local Plan standards.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>
Pegasus Group on behalf of Mulberry Land	29 <sup>th</sup> October 2021	<p><b>10. LOCAL SERVICES (LOCAL CHALLENGES) I&amp;O PART 13</b></p> <p><b>10.1 Car parking / electric vehicle car parking</b></p> <p>10.1.1 Our clients are generally supportive of the objective to increase the installation of electric vehicle charging points and are already providing them on sites currently being developed (Mulberry Homes Initiatives: Electric Vehicle Charging Points).</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will undertake a whole plan viability assessment, as well gather evidence for other aspects of the plan relating to infrastructure,</p>

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		<p>However, they are most effectively regulated through amendments to building regulations.</p> <p>10.1.2 Any proposal for polices relating to the installation of electric vehicle charging points will be required to be tested through the whole plan viability assessment.</p>	<p>housing and economic development choices. The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the emerging new Local Plan.</p>
<p>Planning Issues, on behalf of Churchill Retirement Living and McCarthy Stone Retirement Lifestyles</p>	<p>29th October 2021</p>	<p><b><i>Which of the proposed options illustrated above should be used in determining the location of new development within the Borough area?</i></b></p> <p>The respondents support Option 1 “Concentrate new development within the existing urban areas, particularly the town and district centres, until such land has been fully utilised, only then will Greenfield land be used for development” is the most appropriate for new development.</p> <p>We strongly support the principle of densification and feel that should play a leading role in meeting the housing needs of Oadby &amp; Wigston’s residents. Substantial weight is attributed to the use of brownfield land within settlements for homes in paragraph 118 of the NPPF.</p> <p>Sheltered housing and Extra Care accommodation are characterised as being high density, efficient developments located within existing communities, in sustainable locations within walking distance of shops and services and are typically windfall sites on previously developed land. Policies that encourage the delivery of specialist accommodation for the</p>	<p>Noted.</p> <p>The Council would like to thank Planning Issues, on behalf of Churchill Retirement Living and McCarthy Stone Retirement Lifestyles for taking time to read through the consultation documents and for responding.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will inform policies related to housing..</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>



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		elderly will facilitate building at higher densities in sustainable locations accordingly.	
Planning Issues, on behalf of Churchill Retirement Living and McCarthy Stone Retirement Lifestyles	29th October 2021	<p><b><i>Should all new development incorporate an element of housing, shops, leisure and employment, or should shops and employment remain in designated areas, for example town centres and identified employment areas?</i></b></p> <p>We would argue that this requirement to incorporate shops, leisure and employment uses into new housing developments would be counterproductive. Firstly, not all small and medium sized sites will have sufficient capacity to incorporate a mix of uses. Consequently, this may negatively affect the viability of the development. Secondly, many commercial sectors are volatile presently and demand for retail and office space is falling as a consequence of technological and societal changes. It makes little sense to increase the commercial floorspace accordingly.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>
Planning Issues, on behalf of Churchill Retirement Living and McCarthy Stone Retirement Lifestyles	29th October 2021	<p><b><i>Should the Council be seeking to decrease the minimum affordable housing percentage targets in the new Local Plan?</i></b></p> <p>Affordable Housing, s106 and CIL contributions should be robustly tested through the Plan making process and should be evidence based. Without the preparation of a Local Plan Viability Study, we are of the view that questions over the policy approach towards planning obligations are premature.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies</p>

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		<p>Increased importance has been placed on Local Plan viability testing in the NPPF and the PPG, with the latter stating:</p> <p><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></p> <p>Paragraph: 002 Reference ID: 10-002 20190509</p> <p>In light of the above, it is crucial that the evidence base underpinning the Council's planning obligations framework is both robust and credible, and to that end it is important that developers are given the opportunity to meaningfully inform and provide feedback on this process.</p> <p>To this end, we would like to stress the importance of undertaking viability appraisals for specialist older persons' housing typologies – namely Sheltered Housing and Extra Care accommodation. This is both best practice and in step with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. "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.</p> <p>While a significant number of viability consultants preparing Local Plan Viability Studies do test specialist older persons' housing typologies, a small number do not. The respondents</p>	<p>related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects in relation to the need for Whole Plan and / or Affordable Housing Viability Assessment to test specialist older persons' housing typologies typologies – namely Sheltered Housing and Extra Care accommodation, have been noted and will be considered accordingly.</p>

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		are strongly of the view that the viability of these forms of development should robustly tested during the Plan making process in a manner commensurate with that of other forms of housing.	
Planning Issues, on behalf of Churchill Retirement Living and McCarthy Stone Retirement Lifestyles	29th October 2021	<p><b><i>Which option from the above set of potential options would be the most appropriate for the Borough area?</i></b></p> <p><b><i>your reasons, noting the relevant reference numbers, and add any other comments or alternative suggestions</i></b></p> <p>McCarthy Stone and Churchill Retirement Living are independent and competing housebuilders specialising in sheltered housing for older people. Together, we are responsible for delivering approximately 90% of England’s specialist owner-occupied retirement housing.</p> <p>Paragraph 1 of the PPG Housing for Older and Disabled people 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. .... 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</i></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council’s Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to include a policy framework that encourages the delivery of specialist older persons’ housing on previously developed land has been noted and will be considered accordingly.</p>

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		<p><i>plan-making through to decision-taking</i>". Paragraph: 001 Reference ID: 63-001-20190626</p> <p>Through their representations on other emerging Local Plans, McCarthy Stone and Churchill Retirement Living have been concerned by the limited consideration given to the future requirements for specialist older persons housing, particularly in some Housing Needs Assessments. It is therefore welcomed that recognises the need to provide housing to meet the needs of its older residents.</p> <p>In terms of a general approach, we consider that a requirement for new housing to be adaptable in later life is sensible as it will allow individuals to remain in their homes should they choose to do so. This will not however address matter such as loneliness or the need for regular care that specialist older persons' housing provides. Sufficient provision should therefore be made to provide specialist older persons' developments for those who need to move into such accommodation out of choice or necessity. We would encourage the creation of a planning policy framework which supports specialist older persons' housing in appropriate locations.</p> <p>Specialist older persons' housing is typically located circa 0.5miles from a town or local centre placing residents within close proximity of the shops, services and community facilities located therein. This helps facilitate the continued independence of older people as they can access goods</p>	

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		<p>and services more easily and continue to play an active role in their local community, without the need for a car. The allocation of specialist older persons' housing in large greenfield sites is rarely suitable accordingly.</p> <p>We would therefore recommend a policy framework that encourages the delivery of specialist older persons' housing on previously developed land.</p>	
<p>Planning Issues, on behalf of Churchill Retirement Living and McCarthy Stone Retirement Lifestyles</p>	<p>29th October 2021</p>	<p><b><i>Which of the above potential options do you consider is / are the most appropriate for the Borough area?</i></b></p> <p>We consider 'Maintain the Council's town and district centre first approach to retail development.' To be the most appropriate for our developments. The Council's first approach to retail development is main town centre uses will be prioritised within the town centres or district centres first.</p> <p>It is well recognised and publicised that the role of town centres is changing and that many traditional uses, in particular retail, are moving away from the high-street.</p> <p>Specialist older persons' housing is typically located circa 0.5miles from a town or local centre placing residents within close proximity of the shops, services and community facilities located therein. This helps facilitate the continued independence of older people as they can access goods and services more easily and continue to play an active role in their local community, without the need for a car.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>

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		<p>Specialist older persons' housing however has a corresponding role in supporting the vitality and viability of town and local centres. A recent paper entitled 'Silver Saviours of the High Street' by WPI Strategy (February 2021) concluded that:</p> <ul style="list-style-type: none"> <li>• 63% of residents of specialist older persons' housing's annual expenditure is in local shops. This is much higher than the average local spend by 80+ year olds in the general population.</li> <li>• A typical 45-unit retirement development generates £550,000 of spending per year, £347,000 of which goes to local shops, supporting retail jobs and keeping shops open.</li> <li>• Assuming a shop has an owner and two full time equivalent employees, a specialist older persons' housing development would support one shop on the high street.</li> </ul> <p>We would therefore respectfully suggest to the Council, that specialist older persons' housing can play a significant role in supporting its town and local centres via the Councils first approach.</p>	
Planning Issues, on behalf of Churchill Retirement Living and	29th October 2021	<p><b><i>Should the Council 'roll forward' the current policy approach set out in Local Plan (relevant parts of) Policy 39 – Sustainable Drainage and Surface Water, ensuring that it is up to date with current national planning policy and guidance?</i></b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>

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McCarthy Stone Retirement Lifestyles		<p>The Council’s concerns regarding increased occurrences of flooding and in particular surface water flooding is commendable, although we consider that the NPPF and the PPG consider this matter in depth. This matter is already reviewed at length by Local Lead Flood Authorities and drainage is key consideration in the determination of any planning application. If the Council is considering a policy for an enhanced SuDs requirements on new sites, then the costs will need to be robustly and proportionately accounted for in the Local Plan Viability Assessment and balanced against the planning obligations regime accordingly. We would respectfully remind the Council that the PPG states that “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” (Paragraph: 002 Reference ID: 10-002-20190509).</p>	
Planning Issues, on behalf of Churchill Retirement Living and McCarthy Stone Retirement Lifestyles	29th October 2021	<p><b><i>In what ways do you consider that the Council could ensure genuine and demonstrable biodiversity net gains on all new development sites?</i></b></p> <p>The Council’s commitment to biodiversity net gain and the restoration of the landscape is commendable.</p> <p>We would respectfully remind the Council that the PPG states that “The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>

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		<p>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” (Paragraph: 002 Reference ID: 10-002-20190509).</p> <p>Therefore, while we support measures for biodiversity net gain, the costs will need to be robustly and proportionately accounted for in the Local Plan Viability Assessment and balanced against the planning obligations regime accordingly.</p>	
<p>Planning Issues, on behalf of Churchill Retirement Living and McCarthy Stone Retirement Lifestyles</p>	<p>29th October 2021</p>	<p><b><i>Should the Council develop a Local Policy that actively promotes and encourages sustainable transport and discourages the use of the private car?</i></b></p> <p>Increasing built densities in the most sustainable locations, for example near to town and district centres, will reduce the need for car journeys.</p> <p>Specialist older person’ housing developments are typically located on or close to high streets, ensuring the residents have easy access to local shops and services. It has been found that, of those residents who have given up car ownership, as the majority eventually will, a very significant proportion, of about 18%, do so at, or close to, the time that they enter this form of housing. This reduction in car ownership is more pronounced for residents of ‘Extra Care accommodation’ which is specialist older persons’ accommodation that is aimed at the ‘frail’ elderly. The average age of a resident in a McCarthy Stone ‘Retirement Living Plus’ (Extra development) is currently 83 years old.</p>	<p>Noted.</p>



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Planning Issues, on behalf of Churchill Retirement Living and McCarthy Stone Retirement Lifestyles	29th October 2021	<p><b><i>Should the Council require all development proposals, regardless of size, to contribute towards delivery of educational infrastructure?</i></b></p> <ul style="list-style-type: none"> <li>• <b><i>Should the Council consider any of the other options set out above appropriate?</i></b></li> <li>• <b><i>Should the Council only apply the policy principles and guidance set at a national level through the National Planning Policy Framework and the National Planning Practice Guidance?</i></b></li> </ul> <p>If the Council is considering a policy for all developments to contribute towards the development of educational infrastructure, then the costs will need to be robustly and proportionately accounted for in the Local Plan Viability Assessment and balanced against the planning obligations regime accordingly.</p> <p>We would respectfully remind the Council 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).</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>
Planning Issues, on	29th October	<p><b><i>Should the Council ‘roll forward’ the current policy approach set out in Local Plan (relevant parts of) Policy</i></b></p>	<p>Noted.</p>

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behalf of Churchill Retirement Living and McCarthy Stone Retirement Lifestyles	2021	<p><b>26 – Sustainable Transport and Initiatives, ensuring that it is up to date with current national planning policy and guidance?</b></p> <p>Residents of our Retirement Living developments are most likely to walk into the Town Centre as our developments are located within a 0.5 mile radius of the centre of town. Therefore, McCarthy &amp; Stone and Churchill Retirement Living will support the improvement of walking and cycling infrastructure around Town Centre areas.</p>	<p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects relating to cycling and walking infrastructure have been noted and will be considered accordingly.</p> <p>The Council will also refer to the latest version of the Local Cycling and Walking Infrastructure Plan (LCWIP) for the Borough, being prepared by Leicestershire County Council.</p> <p>The Council is also actively monitoring announcement from Active Travel England (ATE) and will seek to engage with them as appropriate, in due course.</p>

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Planning Issues, on behalf of Churchill Retirement Living and McCarthy Stone Retirement Lifestyles	29th October 2021	<p><b><i>Should the Council ‘roll forward’ the current policy approach set out in Local Plan (relevant parts of) Policy 26 – Sustainable Transport and Initiatives, ensuring that it is up to date with current national planning policy and guidance?</i></b></p> <p>In relation to Q23. A high percentage of our residents do not own cars and as stated previously rely on walking to town centres and the use of public transport to travel further distances. Therefore, McCarthy &amp; Stone and Churchill Retirement Living will support improvements to current public transport infrastructure.</p>	Noted.
Planning Issues, on behalf of Churchill Retirement Living and McCarthy Stone Retirement Lifestyles	29th October 2021	<p><b><i>Which of the above potential options do you consider to be the most appropriate... Require all new homes to have at least one of the elements listed above (in bullets) built into its design and build.</i></b></p> <p>The Councils commitment to sustainable homes is commendable.</p> <p>Although, we would respectfully remind the Council 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).</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>

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		Therefore, it can be considered appropriate for the requirement of at least one element listed above is adhered to. However, problems may arise if the implication of installing all elements listed is necessary. This will affect small businesses or single unit developments in terms of viability.	
Planning Issues, on behalf of Churchill Retirement Living and McCarthy Stone Retirement Lifestyles	29th October 2021	<p><b><i>Which one of the above potential options do you consider to be the most appropriate?</i></b></p> <p>Do not have a requirement for all new development to make use of the highest quality methods of construction and use the highest quality materials.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>
Planning Issues, on behalf of Churchill Retirement Living and McCarthy Stone Retirement Lifestyles	29th October 2021	<p><b><i>Which of the above potential options relating to local design codes do you consider to be the most appropriate for the Borough area?</i></b></p> <p>Keep any local design codes produced, quite high level, illustrative and less prescriptive, rather than having local design codes that are more detailed and prescriptive.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>
Planning Issues, on behalf of Churchill	29th October 2021	<p><b><i>Should the Council 'roll forward' the current Local Plan policy relating to Health Impact Assessments (Policy 5) with wording amendments where necessary?</i></b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations,</p>

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Retirement Living and McCarthy Stone Retirement Lifestyles		<p>We welcome the Council's commitment to the health and wellbeing of its residents. The demographic profile of Oadby &amp; Wigston is ageing which inevitably results in an increase in frail individuals and persons with long term health issues. There is a commensurate pressure on care and health services accordingly with many local authorities spending over a third of their budgets on adult social care currently.</p> <p>It is well established that poor housing can exacerbate health problems in old age, with enormous resultant costs to the NHS and social care. For example:</p> <p><b>Falls</b> - Public Health England statistics show that in 2017/18 falls accounted for 335,000 hospital admissions in England of people aged 65 and over.</p> <p><b>Cold Homes</b> - Millions of older people in the UK are living in homes that are too cold. A cold home can cause chronic and acute illnesses and lead to reduced mobility, falls and depression.</p> <p><b>Social Isolation</b> - 1.5 million people aged 50 and over are always or often lonely, researchers have calculated. Loneliness makes it harder for people to regulate behaviours such as drinking, smoking, and over-eating, which in turn have their own significant negative outcomes Specialist older persons' housing has been developed with the needs of the elderly in mind, enabling them to remain independent for longer. These homes are designed to be warm and with features to alleviate the physical impact of ageing (such as level access throughout) and offer opportunities for residents to access support, care, and companionship. The recently</p>	<p>policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>There is now an interactive process available to developers via the online '<a href="#">Healthy Place Making</a>' tool (development being led by Active Together and in partnership with Public Health) will be considered moving forwards.</p> <p>The Council has committed to working in partnership with Public Health to understand how the role of Health Impact Assessment can be strengthened and therefore this representation will also help to feed into the emerging policy in the Local Plan.</p>

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		<p>published Healthier and Happier Report by WPI Strategy (September 2019) calculated that <b>the average person living in specialist housing for older people saves the NHS and social services £3,490 per year.</b></p> <p>The Council's aspirations to improve the health and wellbeing of its residents is commendable and we are strongly of the view that increasing the delivery of specialist older persons' housing is wholly aligned with this objective.</p>	
Severn Trent	15 <sup>th</sup> October 2021	<p><b>New Local Plan – Issues and Options Regulation 18</b></p> <p>Thank you for the opportunity to comment on your consultation, regarding Issues and Options for the new Oadby and Wigston Local Plan. There were a number of questions within the consultation, some of which are outside of our area of expertise and we have not therefore response to them.</p>	<p>Noted.</p> <p>The Council would like to thank Severn Trent for taking time to read through the consultation documents and for responding.</p>
Severn Trent	15 <sup>th</sup> October 2021	<p><b><i>Which of the proposed options illustrated above should be used in determining the location of new development within the Borough area?</i></b></p> <p><b><i>Option 1: Concentrate new development within the existing urban areas, particularly the town and district centres, until such land has been fully utilised, only then will greenfield land be used for development.</i></b></p> <p>Existing infrastructure will be available for brownfield development and there are opportunities to remove surface water or attenuate surface water within the development that</p>	<p>Noted.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>The Council will also undertake evidence gathering in terms of infrastructure and transport at a strategic and local level and the findings of these studies</p>

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		<p>could result in the sewerage system and the development site being more resilient to the risk of flooding and the impacts of Climate Change. However, where improvements are required these may be more expensive and difficult to deliver due to the urban nature of the catchment, as such early consultation is recommended to understand any constraints of development and how they can be overcome.</p> <p><b><i>Option 2: Focus new development towards the greenfield areas of the Borough only, for example many of which that have been put forward for consideration to the Council and are included in the 'Call for Sites: Site Collation and Initial Assessment'.</i></b></p> <p>Greenfield development could be easier to provide capacity for in some areas and provide the opportunity to re-configure some parts of the network. However, as all flows entering the sewerage network will be new there may not be enough capacity in the network and it is more likely that upgrades will be required. It is vital that surface water is managed sustainably and not directed to the sewerage system.</p> <p><b><i>Option 3: Take a balanced approach to the location of new development with a mix of urban development and greenfield land development.</i></b></p> <p>This option provides the most resilient option but would decrease the certainty of sites coming forward and limit the ability to commence assessments for sewer capacity needs</p>	<p>(and all evidence base) will inform policies related to housing and new development, including that related to the consideration and assessment of specific sites put forward for new growth opportunities.</p> <p>As part of this work, the Council has already begun and will continue to regularly engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions will continue to take shape.</p> <p>For example, 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.</p> <p>The Local Plan will consider a variety of sites by size and location to determine the best options for delivering the Borough's housing requirement.</p> <p>All sites received to date via the Call for Sites process in 2020 and 2021 will be taken into account accordingly.</p>

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		prior to development progression to a greater confidence of delivery.	
Severn Trent	15 <sup>th</sup> October 2021	<p><b><i>Do you think that the Council should maintain the current Local Plan policy position relating to Green Infrastructure, in the new Local Plan, with minor wording amendments to ensure that it is up-to-date with current national planning policy and guidance?</i></b></p> <p>Severn Trent would support the approach to retain watercourses in open spaces and maintain the approach of making space for water such that properties and services are protected from flood risk wherever possible.</p> <p>We would also highlight that this approach can be maintained through the integration of SuDS and open spaces within new developments, and that these aspects can also be utilised to support sustainable travel routes that add both biodiversity and amenity benefits where designed effectively.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p> <p>The specific recommendations to improve and strengthen the relevant aspects have been noted and will be considered accordingly.</p>
Severn Trent	15 <sup>th</sup> October 2021	<p><b><i>Should the Council 'roll forward' the current policy approach set out in Local Plan (relevant parts of) Policy 39 – Sustainable Drainage and Surface Water, ensuring that it is up to date with current national planning policy and guidance?</i></b></p> <p>Severn Trent would support the approach identified in Policy 39 updated to meet current national planning policy and guidance, but would recommend that the policy also looks to</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p>



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		highlight national Planning Practice Guidance regarding the discharge of surface water in line with the Drainage Hierarchy (PPG, Paragraph 80).	The specific recommendations to improve and strengthen the relevant aspects have been noted and will be considered accordingly. In particular, reference to National Planning Practice Guidance regarding the discharge of surface water in line with the Drainage Hierarchy (PPG, Paragraph 80) has been noted.
Severn Trent	15 <sup>th</sup> October 2021	<p><b><i>Should the Council ‘roll forward’ the current policy approach set out in Local Plan (relevant parts of) Policy 38 – Climate Change, Flood Risk and Renewable Low Carbon Energy, ensuring that it is up to date with current national planning policy and guidance?</i></b></p> <p>Severn Trent would support the principles outlined within the relevant section of Policy 38 (Flood Risk), in such that they follow the principles of national guidance but also highlight the need for development to utilise the findings of the Flood Risk Assessment, We would recommend that flood risk should be considered when considering sewerage infrastructure, both to protect assets such as pumping stations from flooding, and to ensure that surface water outfalls can operate as designed even if the rivers are in flood.</p> <p>We would also support the need to prevent contamination being conveyed into watercourses or groundwater.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p>
Severn Trent	15 <sup>th</sup> October 2021	<p><b><i>Remove the policy approach and only apply the policy principles and guidance set at a national level through the National Planning Policy Framework and the National</i></b></p>	Noted.

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		<p><b><i>Planning Practice Guidance?</i></b></p> <p>Recommend keep the Policy details above regarding Policy 38.</p>	
Severn Trent	15 <sup>th</sup> October 2021	<p><b><i>Do you consider that the Council should be undertaking a full review of the existing Strategic Flood Risk Assessment or review and only up-date the existing study as and where necessary?</i></b></p> <p>Severn Trent would be willing to co-operate and liaise with the LPA if a new SFRA is required, but we are unable to comment on the need for an update at this time.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p>
Severn Trent	15 <sup>th</sup> October 2021	<p><b><i>Should the Council 'roll forward' the current policy approach set out in Local Plan (relevant parts of) Policy 37 – Biodiversity and Geodiversity, ensuring that it is up to date with current national planning policy and guidance?</i></b></p> <p>Severn Trent are not able to provide many comments on this, however we would note that when looking to improve biodiversity, opportunities could be found through appropriate SuDS design on new developments or the installation of retrofit SuDS such as tree-pits and bio-retention areas within the urban landscape to both provide flood mitigation and links for wildlife to cross the urban landscape.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance, including the Environment Bill.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan, including Biodiversity Net Gain.</p> <p>The suggestion to pay greater attention to sustainable drainage systems (SuDS) and the role that they can play has been noted.</p>

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			As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.
Severn Trent	15 <sup>th</sup> October 2021	<p><b><i>Are there any elements of sustainable home design that have been missed from the bullet list above, that you consider would be effective in helping battle climate change and reducing energy usage?</i></b></p> <p>Severn Trent would highlight that the implementation of Water efficient technology and fittings usually has energy efficiency benefits due to the reduced need to heat water as such benefits for both water and energy efficiency can be realised at the same time. We would therefore recommend that designing building to the optional Water efficiency target set out in Building Regulations Part G 110 litres per person per day is required.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance, including the Environment Bill.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan, including water efficiency, climate change and reducing energy usage.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Severn Trent	15 <sup>th</sup> October 2021	<p><b><i>What is good design to you?</i></b></p> <p>Severn Trent consider the design of new development to manage surface water sustainably to be good design, however</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations,</p>

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		<p>it is important that these designs meet current industry best practice for SuDS. The SuDS Manual C753 and are designed to provide benefits against all four pillar of SuDS water quantity, water quality, biodiversity and amenity.</p> <p>Development should also be designed to separate surface water and foul flows ensuring that surface water is discharged in accordance with the drainage hierarchy Planning Practice Guidance Paragraph 80</p> <p>Development layouts should account for the natural topography and flow routes such that exceedance flows are directed away from properties and that critical drainage or sewerage assets such as pumping stations are not located at risk of flooding. Development layouts should also look to minimise the number of pumping stations required.</p> <p>As detailed above development should be designed to be water efficient and to ensure that this is delivered we recommend that development is built to the optional Water efficiency target set out in Building Regulations Part G.</p> <p>Where sewer are proposed for adoption they will need to be built to meet Design and Construction Guidance - <a href="https://www.water.org.uk/sewerage-sector-guidance-approved-documents/">https://www.water.org.uk/sewerage-sector-guidance-approved-documents/</a></p>	<p>policy and guidance, including the Environment Bill.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan, including water efficiency, climate change and reducing energy usage.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>All of the specific recommendations that Severn Trent consider critical to achieving good design will be taken into consideration accordingly as the Local Plan progresses.</p>
Severn Trent	15 <sup>th</sup> October 2021	<b><i>Should the Council be producing a criteria based policy, and if so, what criteria / design principles should be included?</i></b>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance</p>

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		<p>Severn Trent would encourage the LPA to include references to SuDS, Water efficiency, the drainage hierarchy and protection of watercourses within any design guide criteria. Further detail on each point raised below.</p> <p><b>Drainage Hierarchy</b></p> <p>The drainage hierarchy outlined the principles of where surface water should be discharged, the hierarchy is outlined within Planning Practice Guidance paragraph 80 (Reference ID: 7-080-20150323). Severn Trent request evidence that the drainage hierarchy has been followed by developers in our conversations, however by raising the expectation at the Neighbourhood Plan stage it consideration can be incorporated into the initial a site designs resulting it better continuity of surface water through development. To aid in the interpretation of this request we would recommend that the following wording is incorporated into any design criteria:</p> <p><i>All applications for new development shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, in such that a discharge to the public sewerage systems are avoided, where possible.</i></p> <p><b>SuDS (Sustainable Drainage Systems)</b></p> <p>Severn Trent note that Planning Policy already requires major development to incorporate SuDS through the written</p>	<p>with the relevant Government Acts, Regulations, policy and guidance, including the Environment Bill.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan, including water efficiency, climate change and reducing energy usage.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>All of the specific recommendations that Severn Trent consider critical to achieving a good criteria-based design policy will be taken into consideration accordingly as the Local Plan progresses.</p>

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		<p>Ministerial Statement for Sustainable Drainage (HCWS 161) and NPPF. However current policy is very flexible on how SuDS can be incorporated into development, by incorporating appropriate references to SuDS any design Criteria, the need for developers to deliver high quality SuDS can be secured. Current Industry Best Practice for SuDS (The SuDS Manual CIRIA C753) highlights the need to consider SuDS from the outset of the design process and not to fit SuDS to the development site post layout. To aid in the delivery of this recommendation we would recommend wording to the effect of:</p> <p><i>All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are put in place unless demonstrated to be inappropriate.</i></p> <p><i>All schemes for the inclusions of SuDS should demonstrate they have considered all four aspects of good SuDS design, Quantity, Quality, Amenity and Biodiversity, and the SuDS and development will fit into the existing landscape.</i></p> <p><i>The completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure that the SuDS are maintained in perpetuity.</i></p> <p><i>Where possible, all non-major development should look to incorporate these same SuDS principles into their designs.</i></p>	

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		<p>The supporting text for the policy should also include:</p> <p><i>Sustainable Drainage Systems (SuDS) should be designed in accordance with current industry best practice, The SuDS Manual, CIRIA (C753), to ensure that the systems deliver both the surface water quantity and the wider benefits, without significantly increasing costs. Good SuDS design can be key for creating a strong sense of place and pride in the community for where they live, work and visit, making the surface water management features as much a part of the development as the buildings and roads.</i></p> <p>We would also note that as the Lead Local Flood Authority (LLFA) are the statutory consultee for the planning process in relation to surface water management that they should also be consulted on any wording regarding SuDS.</p> <p><b>Water Efficiency</b></p> <p>Water efficient design and technology is important for ensuring the sustainability of the water supply system for the future, both supporting existing customers and future development. NPPF supports the delivery of sustainable development and the Humber River Basin Management Plan promotes the use of the tighter Water Efficiency Target within Building Regulations Part G. We would recommend that this detailed with any design criteria so that developers are aware of what is expected of them from the outset of the design process.</p>	

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		<p>To aid with the implementation of the recommendation we have provided some example wording below:</p> <p><i>All development should demonstrate that they are water efficiency, where possible incorporating innovative water efficiency and water re-use measures, demonstrating that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day.</i></p> <p><b>Retention of existing drainage networks (including the Protection of Watercourses)</b></p> <p>New Development has the potential to interrupt both manmade and natural drainage systems that perform a vital function in preventing flooding and conveying water safely through the landscape, the damage of; or removal of part of this network could result in increase flood risk on the development site or impact on the effectual drainage of other land.</p> <p>In the cases of ditches or watercourses the removal or culverting of these features can also impact on biodiversity by reducing the access to water for wildlife and result in loss of habitats.</p> <p>Severn Trent therefore recommend that the drainage systems of a site are understood before any site layout is constructed such that they can be incorporated into the layout of the development in the most effective and natural way, some example working is provide below to assist with</p>	



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		<p>implementation of the recommendation.</p> <p><i>No development shall prevent the continuation of existing natural or manmade drainage features, where watercourses or dry ditches are present within a development site, these should be retained and where possible enhanced.</i></p> <p><i>Access to drainage features for maintenance should be retained and ownership of land clearly defined as part of the overall site maintenance plan.</i></p> <p><i>Prior to the alteration of any alignment an assessment will be required to ensure that all connections into the watercourse are retained and that exceedance flows are not then directed away from the watercourse channel towards properties.</i></p> <p>The supporting text for the policy should also include:</p> <p><i>The removal of watercourses and ditches from development sites, presents a risk for future growth and development in such that links to the natural water cycle can be removed resulting in a potential increase of on site and off site flood risk. The removal of these features would result in an increased need to connect surface water to the sewerage network, as identified above this is against the drainage hierarchy outline in the Planning Practice Guidance.</i></p>	
Severn Trent	15 <sup>th</sup> October 2021	<b>Should the Council 'roll forward' the current policy approach set out in Local Plan Policy 44 – Landscape and</b>	Noted.  The Local Plan must be prepared in accordance

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		<p><b><i>Character, ensuring that it is up to date with current national planning policy and guidance?</i></b></p> <p>Severn Trent understand the need for Local Green Spaces and the need for it to be protected, however open spaces can provide suitable locations for schemes such as flood alleviation to be delivered without adversely impacting on the primary function of the open space. If the correct scheme is chosen, the flood alleviation schemes can result in additional benefits to the local green space in the form of biodiversity or amenity improvements. We would therefore recommend that the local plan supports the delivery of flood alleviation projects where required within green spaces.</p> <p><i>Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.</i></p>	<p>with the relevant Government Acts, Regulations, policy and guidance, including the Environment Bill.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan, including water efficiency, climate change and reducing energy usage.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Severn Trent	15 <sup>th</sup> October 2021	<p><b><i>Which of the above potential options relating to local design codes do you consider to be the most appropriate for the Borough area?</i></b></p> <p><b><i>Which areas / parts of the Borough do you consider would benefit from the production of local design codes?</i></b></p> <p>The comments we have provided within this response are not location specific, but should be applied borough wide, to ensure consistence and delivery of current best practice.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance, including the Environment Bill.</p>

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Severn Trent	15 <sup>th</sup> October 2021	<p><b><i>What do you consider to be the key principles of Place making?</i></b></p> <p>Severn Trent are supportive of the need to create a sense of place and community within new development such to bring people together, we understand that Master planning of large development sites are intended to understand how the various parts and areas of these new developments will work together, to deliver a sustainable and health community.</p> <p>We would however recommend for large developments / allocations that sewerage and drainage designs are considered at the masterplan stage to prevent the development of plot drainage that does not tie in with a site wide strategy and prevent dysconnectivity of surface water systems from sustainable outfalls. There is a need to prevent the delivery of new infrastructure that is inadequately sized or designed to accommodate subsequent phases of the development / allocation.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance, including the Environment Bill.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan, including water efficiency, climate change and reducing energy usage.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Severn Trent	15 <sup>th</sup> October 2021	<p>Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.</p> <p>For your information we have set out some general guidelines that may be useful to you.</p> <p><b>Position Statement</b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance, including the Environment Bill.</p>

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		<p>As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.</p>	
Severn Trent	15 <sup>th</sup> October 2021	<p><b>Sewage Strategy</b></p> <p>Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance, including the Environment Bill.</p>
Severn Trent	15 <sup>th</sup> October 2021	<p><b>Surface Water and Sewer Flooding</b></p>	<p>Noted.</p>

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		<p>We expect surface water to be managed in line with the Government's <i>Water Strategy, Future Water</i>. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewerage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.</p> <p>We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.</p> <p>To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website</p> <p><a href="https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-andguidance/infrastructure-charges/">https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-andguidance/infrastructure-charges/</a></p>	<p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance, including the Environment Bill.</p>
Severn Trent	15 <sup>th</sup> October 2021	<b>Water Quality</b>	Noted.

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		<p>Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.</p>	<p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance, including the Environment Bill.</p>
Severn Trent	15 <sup>th</sup> October 2021	<p><b>Water Supply</b>                      When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.</p> <p>We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance, including the Environment Bill.</p>
Severn Trent	15 <sup>th</sup> October 2021	<p><b>Water Efficiency</b></p> <p>Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance, including the Environment Bill.</p>

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		<p>installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.</p> <p>We recommend that in all cases you consider:</p> <ul style="list-style-type: none"> <li>• Single flush siphon toilet cistern and those with a flush volume of 4 litres.</li> <li>• Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.</li> <li>• Hand wash basin taps with low flow rates of 4 litres per minute or less.</li> <li>• Water butts for external use in properties with gardens.</li> </ul> <p>To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website</p> <p><a href="https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-andguidance/infrastructure-charges/">https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-andguidance/infrastructure-charges/</a></p> <p>We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.</p>	

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		<p>We would also encourage the use of rainwater harvesting on larger developments, either residential or commercial. This helps to reduce the demand on public supply, associated carbon impact of supply and also reduced site run off and sewer flows. Rainwater Harvesting as a development rather than on a property by property basis is more cost efficient and can produce greater benefits.</p> <p>Both the <a href="#">River Severn River Basin Management Plan</a> (Page 52) and the <a href="#">Humber River Basin Management Plan</a> (page 46) recommend that Local Plan set out policies requiring homes to meet the tighter water efficiency standard of 110 litres per person per day as described in Part G of Schedule 1 to the Building Regulations 2010. As such Severn Trent's recommendation is consistent with wider objectives within our water supply regions.</p>	
Westernrange Limited and Jelson Homes Limited	28 <sup>th</sup> October 2021	<p><b>New Local Plan Regulation 18 Issues and Options Representations</b></p> <p>Thank you for the opportunity to comment on the Issues and Options version of the Oadby and Wigston Local Plan. These representations are made in relation to Westernrange Limited and Jelson Homes' interests in land to the north of Newton Lane, Wigston. We would offer the following comments on the Key Challenges and Potential Options set out in the document.</p>	<p>Noted.</p> <p>The Council would like to thank Westernrange Limited and Jelson Homes Limited for taking time to read through the consultation documents and for responding.</p>
Westernrange	28 <sup>th</sup> October	<b>OVERARCHING POLICY AREAS</b>	Noted.



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Limited and Jelson Homes Limited	2021	<p><b><i>The Plan Period and Cooperation</i></b></p> <p>The Options document suggests a plan period up to 2041 that reflects the time period for strategic evidence being prepared by the Leicester and Leicestershire HMA authorities. The suggested timeframe for the plan is supported.</p> <p>In terms of Statements of Common Ground, it would be appropriate leading up to the Examination in Public on the Plan for the Council to enter into Statements of Common Ground with key developer interests promoting sites selected for allocation.</p> <p>However, the most important Statement of Common Ground is the agreement of a Statement of Common Ground between the HMA authorities on the distribution of Leicester's unmet needs. This agreement is needed as a matter of urgency to enable local authorities to progress with the preparation of their plans.</p>	<p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>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.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Westernrange Limited and Jelson Homes Limited	28 <sup>th</sup> October 2021	<p><b><i>Where Should Development Go?</i></b></p> <p>Potential options identified in the consultation document include concentrating development within existing urban areas, focusing development towards greenfield sites or taking a balanced approach to new development with a mix of urban and greenfield development.</p>	<p>Noted.</p> <p>All sites received to date via the Call for Sites process in 2020 and 2021 will be taken into account accordingly.</p> <p>The Council are currently undertaking evidence gathering in terms of housing need at a strategic and local level and the findings of these studies will</p>

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		<p>It is clear that the Council will be unable to meet its future housing requirement solely on brownfield sites. The most appropriate strategy will be to plan for a mix of urban and greenfield sites of different sizes and locations to ensure that the housing requirement in the Borough is delivered over the plan period. Greenfield site releases will be necessary and the land north of Newton Lane in the control of Jelson Homes and Westernrange Limited provides an opportunity to provide a highly sustainable development to help meet future housing requirements. Land under the control of Jelson Homes Limited is included in the Council's Call for Sites, Site Collation and Initial Assessment, Spring 2021 under site reference WIG/004. The land at Seven Oaks Farm under the control of Westernrange Limited extends to some 29 ha. For completeness a Call for Sites form has been completed for this land and is submitted alongside these representations.</p> <p>In combination the sites extend to some 69.4 hectares and could deliver up to 2,000 dwellings. An Illustrative Masterplan has been prepared to show how the site could come forward for development and is included as part of this submission.</p>	<p>inform policies related to housing, including that related to the consideration and assessment of specific sites put forward for new growth opportunities.</p> <p>As part of this work, the Council has already and will continue to seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions will continue to take shape.</p> <p>Please note, all submission material, including the Illustrative Masterplan, will be considered accordingly to inform site selection as progress on the Local Plan continues to take shape in due course.</p>
Westernrange Limited and Jelson Homes Limited	28 <sup>th</sup> October 2021	<p><b>HOUSING</b></p> <p><b>Housing Need</b></p> <p>The Issues and Options consultation outlines options for calculating housing needs for the plan period, including continuing to use the current housing requirement of 148</p>	<p>Noted.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies</p>

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		<p>dwelling a year, applying the standard method figure of 180 dwellings a year or using outputs from the Housing and Employment Needs Assessment.</p> <p>The NPPF and Planning Practice Guidance are clear that 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 and 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, unless exceptional circumstances justify an alternative approach (paras 60 and 61, NPPF). Planning Practice Guidance confirms that the NPPF expects strategic policy making authorities to follow the standard method in the Practice Guidance for assessing local housing need which identifies the minimum number of homes expected to be planned for. The Guidance advises that the standard method provides a minimum starting point in determining the number of homes needed in an area (Paragraph: 010 Reference ID: 2a-010-20201216).</p> <p>The plan should therefore use the housing need figure of 180 dwellings per annum as the minimum starting point and consider the need for an uplift to address local economic aspirations or to address affordable housing needs.</p>	<p>related to all aspects of the Plan.</p> <p>The Council will also undertake evidence gathering in terms of infrastructure and transport at a strategic and local level and the findings of these studies (and all evidence base) will inform policies related to housing and new development, including that related to the consideration and assessment of specific sites put forward for new growth opportunities.</p> <p>As part of this work, the Council has already begun and will continue to regularly engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions will continue to take shape.</p> <p>For example, 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.</p> <p>The Local Plan will consider a variety of sites by size and location to determine the best options for delivering the Borough's housing requirement.</p> <p>All sites received to date via the Call for Sites process in 2020 and 2021 will be taken into account accordingly.</p>

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Westernrange Limited and Jelson Homes Limited	28 <sup>th</sup> October 2021	<p><b>Housing Density</b></p> <p>The currently adopted local plan sets out a range of density requirements by location, including an average density of at least 30 dwellings per hectare on sites outside the town and district centres and the Leicester Principal Urban Area. The approach to densities on sites is appropriate and should be carried forward into the new Local Plan. A minimum density target of 30 dwellings per hectare is appropriate for the land north of Newton Lane.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p>
Westernrange Limited and Jelson Homes Limited	28 <sup>th</sup> October 2021	<p><b>Affordable Housing</b></p> <p>The Council's current local plan sets a split target for affordable housing provision, with a target of 30% affordable housing in Oadby and 20% in Wigston, reflecting the different land values in the settlements in the Borough. This split approach to affordable housing provision remains appropriate and should be carried forward into the new local plan.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>

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			The Whole Plan and / or Affordable Housing Viability Assessment will be used to inform the Council's Policy approach and this comment will be considered accordingly.
Westernrange Limited and Jelson Homes Limited	28 <sup>th</sup> October 2021	<p><b>Older Persons Housing</b></p> <p>The consultation document sets out options for securing older persons accommodation in the Borough, including that all developments of 10 or more dwellings must provide homes for older persons accommodation, all developments of 10 or more dwellings will be encouraged to provide homes for older persons accommodation, or alternatively an offsite contribution from all sites of 10 dwellings or more.</p> <p>The provision of older persons housing should be encouraged within the New Local Plan, and the policy approach should be flexible rather than overly prescriptive. However, the policy approach should acknowledge that not all residential sites will be appropriately located within close proximity to facilities and services, and therefore it is not always appropriate to request provision on site. In order to meet the needs of older people, the Council should look to make specific allocations for older persons accommodation that are within close proximity of public transport, local amenities and health services, which is often within or near to existing town centre.</p>	<p>Noted.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>In addition to this, the Council will also undertake a whole plan viability assessment, as well gather evidence for other aspects of the plan relating to infrastructure and housing choices. The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the emerging new Local Plan and by doing so, these discussions can begin to take place.</p> <p>With regards to the specific recommendations on where to locate older person housing, the comments will be considered accordingly as the preparation of the emerging new Local Plan document continues to progress.</p>

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Name of person / body submitting comment	Date on which comment was received	Comment received	Officer response to comment received
Westernrange Limited and Jelson Homes Limited	28 <sup>th</sup> October 2021	<p><b>Green Wedge</b></p> <p>The Issues and Options paper refers to existing Green Wedges identified in the adopted Local Plan including the Oadby and Wigston Green Wedge. The paper suggests that the Council will continue to maintain the Green Wedge designations. Potential options include continuing with the existing policy or considering whether to undertake a Green Wedge review to establish whether or not to retain, create new or amend the boundaries of existing Green Wedges.</p> <p>The purpose of Green Wedges is to influence the form and direction of future development. They are not Green Belt and should be subject to review through the Local Plan in response to future housing requirements. This is the approach the Council took in relation to the adopted Local Plan and the identification of strategic growth options within areas of Green Wedge.</p> <p>In view of the scale of development to be accommodated over the plan period, the Council should undertake a review of Green Wedge boundaries to identify opportunities for development that would not threaten the function of the wider Green Wedge. A small part of the land to the north of Newton Lane falls within the area of Green Wedge. The Indicative Masterplan shows how development can take place without undermining the function or purpose of the wider Green Wedge and without reducing the existing gap between Oadby and Wigston.</p>	<p>Noted.</p> <p>The Council will review all existing designations, including Green Wedges, as part of the emerging Local Plan.</p> <p>Therefore, this representation and the supporting submissions will be taken into account by the Council when reviewing the current Green Wedge Review.</p>

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Westernrange Limited and Jelson Homes Limited	28 <sup>th</sup> October 2021	<p><b>Countryside</b></p> <p>The Issues and Options Paper advises that it is paramount that the Council continues to protect the countryside areas in the Borough. In view of the scale of future housing needs over the period to 2041, the Council will need to consider the release of greenfield sites to meet its housing requirements. Land to the north of Newton Lane provides the opportunity for further residential development to meet housing needs without unacceptable landscape impacts. The Indicative Masterplan shows how development could come forward without any unacceptable landscape impacts.</p>	<p>Noted.</p> <p>The Council will review all existing designations, including Countryside, as part of the emerging Local Plan.</p> <p>Therefore, this representation and the supporting submissions will be taken into account by the Council when reviewing the current Countryside Policy approach.</p>
Westernrange Limited and Jelson Homes Limited	28 <sup>th</sup> October 2021	<p><b>ENVIRONMENT AND SUSTAINABILITY</b></p> <p><b><i>Habitats and Biodiversity</i></b></p> <p>The Issues and Options consultation asks whether the Council should be making use of Natural England's Biodiversity Metric, or whether there are more appropriate ways of calculating biodiversity net gain. Natural England has recently released the Biodiversity Metric 3 and the Environment Bill sets out a requirement of biodiversity net gain. It is important that the new Local Plan it up to date with current and emerging national planning policy and guidance.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p> <p>The Council is committed to working with Local Authorities in Leicester, Leicestershire and Rutland to develop up to date evidence and understanding of this complex and ever changing aspect of Plan making.</p> <p>All of the specific recommendations will be taken</p>

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			into consideration to inform the emerging evidence, as well as the approach included in the new Local Plan.
Westernrange Limited and Jelson Homes Limited	28 <sup>th</sup> October 2021	<p><b>INFRASTRUCTURE</b></p> <p><b><i>Highways Infrastructure Need</i></b></p> <p>The consultation document seeks feedback on transport and infrastructure requirements and how these should be secured through new development. It is considered that the new Local Plan should take opportunities to make housing allocations where there will not be unacceptable impacts on highway safety or severe impacts on the highway network.</p> <p>The land to the north of Newton Lane provides the opportunity for further residential development that would not result in severe impacts on the highway network. The site is well located, with opportunities for sustainable travel modes, and located within a sustainable location within proximity of local facilities and service.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>Cross-boundary transport and infrastructure initiatives, as well as the need to consider and prioritise more sustainable transport solutions have will be considered accordingly moving forwards.</p> <p>As the Plan develops, the Council will seek to work in partnership with Leicester City Council and Leicestershire County Council (as the Highways Authority for the County’s administrative area) to</p>



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			explore cross-boundary infrastructure solutions.
Westernrange Limited and Jelson Homes Limited	28 <sup>th</sup> October 2021	<p><b>HOUSING</b></p> <p><b><i>Technical Housing Standards</i></b></p> <p>Two potential options in relation to Technical Housing Standards are outlined in the Issues and Options paper - rolling forward the requirement to comply with the Governments Technical Housing Standards on all new homes provided through conversions, subdivisions and/or changes of use, or requiring that all new homes comply with the Technical Housing Standards.</p> <p>The proposed approach to requiring all new homes to comply with the Technical Housing Standards is not supported. Footnote 49 of the NPPF advises that "<i>planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified</i>".</p> <p>The Council's approach should recognise that an inflexible policy will impact on affordability and affect customer choice. Smaller dwellings play a valuable role in meeting specific needs for both open market and affordable home ownership housing. The PPG (Paragraph: 020 Reference ID: 56-020-</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>In addition to this, the Council will also ensure that a whole plan viability assessment is undertaken to evidence the emerging new Local Plan.</p>

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		<p>20150327) sets out that “<i>where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies. Authorities should take account of the following areas need, viability and timing</i>” (ID: 56-020-20150327). The Council should provide clear evidence through a local assessment evidencing its case should this option be pursued.</p>	
Westernrange Limited and Jelson Homes Limited	28 <sup>th</sup> October 2021	<p><b>Self and Custom Build</b></p> <p>The policy approach within the current Local Plan seeks to support the provision of self-build and custom build plots. The consultation document seeks feedback on whether this approach should be continued within the new Local Plan, or whether the policy approach should be strengthened to require self-build and custom build plots on all major development sites.</p> <p>There is no legislative or national policy basis for imposing an obligation on landowners or developers to include plots for self and custom build housing on major development sites. Paragraph 62 of the NPPF and the Self Build and Custom Housebuilding Act 2015 confirm that it is the Council's responsibility to ensure that sufficient permissions are given to meet demand. The PPG (Paragraph: 025 Reference ID: 57-025-20210508) sets out ways in which the Council should consider supporting self and custom build by engaging with developers and encouraging the consideration of self and custom build, and facilitating access to those on the register, where the landowner is interested.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The specific examples referenced will also be taken into consideration as the preparation of the emerging new Local Plan document continues to progress.</p>

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		<p>The issue of self and custom build units on larger developments was a matter addressed by the Inspector examining the Blaby Part 2 Local Plan. In this case the Inspector noted that whilst the Self-Build and Custom Build Register may indicate an interest in this type of housing, it was not clear how this evidence translated into actual demand, with potential issues of double counting where individuals register with more than one Council. In proposing a Modification to the plan to remove the requirement for self-build housing on larger sites, the Inspector concluded that the requirement was not justified by the available evidence, there were potential viability issues and there may be negative consequences for the provision of affordable housing (paragraphs 73-79, Inspector's Report, Blaby Part 2 Local Plan, 21st December 2018).</p>	
Westernrange Limited and Jelson Homes Limited	28 <sup>th</sup> October 2021	<p><b><i>Sustainable Homes</i></b></p> <p>The consultation document sets out several options for including measures to reduce greenhouse gases within the design of new homes, including solar panels, electric vehicle charging and air source heat pumps. As the evolution of such measures is moving quickly, it is considered that the most effective way in securing the provision of such measures should be through the building control process.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>
Westernrange Limited and Jelson Homes	28 <sup>th</sup> October 2021	<p><b><i>Housing Choices</i></b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance</p>

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Limited		<p>Policy 11 of the current Local Plan sets out the policy position in relation to housing mix. The consultation document confirms that this approach has been successful in providing a wide range and choice of new homes and therefore the Council will look to continue this approach, with amendments to ensure that it is up to date with national and local policy and guidance. As the existing policy has been effective in ensuring the delivery of a mix of homes, this approach is considered appropriate for the Council to carry forward to the new Local Plan.</p>	<p>with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>In addition to this, the Council will also undertake a whole plan viability assessment, as well as gather evidence for other aspects of the plan relating to infrastructure and housing choices. The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting of the emerging new Local Plan and by doing so, these discussions can begin to take place.</p>
Westernrange Limited and Jelson Homes Limited	28 <sup>th</sup> October 2021	<p><b>DESIGN AND CHARACTER</b></p> <p><b><i>Design Codes</i></b></p> <p>The NPPF advises that local planning authorities should prepare design guides or codes that are consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences. The consultation document confirms that the Council will produce local design codes for the Borough, however, acknowledges that at this stage, there are no details in terms of number of design codes, what parts of the Borough they will relate to, or what level of detail they will include,</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over</p>

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		<p>however sets out that design codes will be produced in conformity with the National Model Design Code.</p> <p>The document sets out several potential options for the production of design codes. It is considered that local design codes should be high level documents, that are illustrative and less prescriptive; this approach will give a level of clarity and certainty, however, will also allow for a degree of flexibility.</p>	<p>the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the Council's approach into taking account of design codes in new developments have been noted and will be considered accordingly.</p>
Westernrange Limited and Jelson Homes Limited	28 <sup>th</sup> October 2021	<p><b><i>Renewable and Low Carbon Energy Production</i></b></p> <p>The Issues and Options paper sets out several options for new buildings to incorporate renewable and low carbon energy infrastructure. As the evolution of such measures is moving quickly, it is considered that the most effective way in securing the provision of such measures should be through the building control process.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Westernrange Limited and Jelson Homes Limited	28 <sup>th</sup> October 2021	<p><b>HEALTH AND WELLBEING</b></p> <p><b><i>Open Space, Sport and Recreation Facilities</i></b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations,</p>

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		<p>The consultation document considers that the most suitable option is to carry forward the existing Local Plan Policy 9 into the new Local Plan. The document acknowledges that the current policy approach has been effective and therefore the Council propose to review and update the evidence base to ensure that all necessary infrastructure can be delivered in order to support the planned level of growth to 2041. This approach is supported.</p>	<p>policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
<p>Westernrange Limited and Jelson Homes Limited</p>	<p>28<sup>th</sup> October 2021</p>	<p><b>Health Impact Assessments</b></p> <p>Policy 5 requires all major development proposals to be accompanied by a Health Impact Assessment screening statement, to consider the potential impact and demands of the development proposal upon existing services and facilities. Potential options consider continuing with this approach and continuing to work with all relevant stakeholders, through the Local Plan and planning application processes. This approach is supported.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>

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Westernrange Limited and Jelson Homes Limited	28 <sup>th</sup> October 2021	<p><b>LOCAL SERVICES</b></p> <p><b><i>Car Parking/Electric Vehicle Car Parking</i></b></p> <p>In relation to electric vehicle charging, the Issues and Options document sets out a range of potential options in relation to the provision of electric vehicle charging points; with options for provision in all new homes, as well as an option requiring the provision of enabling infrastructure.</p> <p>The Government's preferred approach is the introduction of a new requirement for electric vehicle charging points under Part S of the Building Regulations to introduce a standardised approach. Once introduced, this would supersede the proposed policy approach in the Draft Plan. There is a risk that requirements for the installation of electric vehicle charging points could result in the installation of obsolete technology as the evolution of the technology is moving at pace. The policy should reference the installation of a charging point or cable routing to provide necessary flexibility in the nature of the provision. The potential option that requires provision of enabling infrastructure is therefore supported.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The specific recommendation will be taken into consideration as the preparation of the emerging new Local Plan document continues to progress.</p>
Westernrange Limited and Jelson Homes Limited	28 <sup>th</sup> October 2021	<p><b><i>Community Facilities</i></b></p> <p>Policy 7 of the adopted Local Plan sets out the current policy position in relation to the provision of community facilities, and the consultation document acknowledges that this has been successful in ensuring the provision of community facilities. Other potential options are to require all development to</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The specific recommendation will be taken into</p>

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		<p>contribute towards community facilities provision, and requiring only large scale development to contribute. Elsewhere within the consultation document, large scale provision is referenced as major development proposals (10 dwellings and over) in accordance with the glossary of the NPPF.</p> <p>It is considered that it is only appropriate for large scale development to contribute towards community facility provision. The provision of community facilities on site should only be included within strategic developments, and for other development sites, offsite contributions to existing facilities are most appropriate.</p>	<p>consideration as the preparation of the emerging new Local Plan document continues to progress.</p>
<p>Westernrange Limited and Jelson Homes Limited</p>	<p>28<sup>th</sup> October 2021</p>	<p><b>MASTERPLANNING</b></p> <p><b><i>Large Scale Change and Place Making</i></b></p> <p>The consultation document sets out that the Council will require the production of masterplans, development briefs or other appropriate strategies in accordance with Policy 3. The consultation document proposes to carry forward the existing policy, and make the definition of 'large scale change' consistent with the definition of major development within Annex 2 of the NPPF, which for housing is 10 dwellings or more.</p> <p>Whilst the existing policy does not appear to define large scale change, it is considered that 100 dwellings or more is an appropriate quantum of development for large scale change. This should be defined within the new Local Plan.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>In the context of defining what constitutes '<i>large scale change</i>' the Council considers the definition of 'major development' as per the National Planning Policy Framework (NPPF 2021), to be the benchmark for defining this Policy approach. The definition included in the NPPF is '<i>for housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development, it means additional floorspace of 1,000m<sup>2</sup> or more, or a site of 1 hectare or more, or as otherwise provided in the</i></p>



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			<i>Town and Country Planning (Development Management Procedure) (England) Order 2015</i> '.
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b>Section 3 HOUSING (STRATEGIC CHALLENGES)</b></p> <p><b><i>Housing Need</i></b></p> <p>Oadby &amp; Wigston is a very small Borough with very little spare land. There is already a housing requirement of 148 new homes per year, and the Government's calculation is that this should be increased to 180. If this figure were to be enforced, it would seriously affect the few remaining green area within the Borough.</p> <p>There is already serious traffic congestion at peak travel times and it is difficult to see how existing roads could be improved to accommodate more vehicles. About 30 years ago, when the Wigston Harcourt Estate was completed, the Moat Street junction was declared to be overloaded.</p> <p><b><i>Potential Options.</i></b></p> <p>It seems that it would be unwise to increase the current housing requirement of 148 new homes per year. Further impact on green areas risks loss of yet more biodiversity, when the country has already lost nearly 50%.</p> <p>The outputs of the Housing and Employment Needs Assessment, should, when available, be able to inform decisions on future housing requirements.</p>	<p>Noted.</p> <p>The Council would like to thank Wigston Civic Society for taking time to read through the consultation documents and for responding.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council's Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>The Council will also undertake evidence gathering in terms of infrastructure and transport at a strategic and local level and the findings of these studies (and all evidence base) will inform policies related to housing and new development, including that related to the consideration and assessment of specific sites put forward for new growth opportunities.</p> <p>As part of this work, the Council has already begun and will continue to regularly engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions will continue to take shape.</p>

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		<p>In view of the current evidence available, it seems that the Borough cannot provide any of Leicester’s unmet need.</p>	<p>For example, 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.</p>
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b>Housing Density</b></p> <p>Oadby &amp; Wigston is currently being successful in meeting its prescribed minimum density targets.</p> <p><b>Potential Options</b></p> <p>It seems sensible to roll forward the current Policy on housing density to the new Plan, ensuring that it is up to date with national policy and guidance.</p> <p>It would be difficult to apply a single density across all areas with a variety of housing types.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the Council’s Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p>
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b>Affordable Housing</b></p> <p>It seems that the Council should roll forward its current policy on this, bringing it up to date with national Policy and guidance, and amend the definition of “major development” to 10 or more new homes.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping</p>

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			<p>to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The Whole Plan and / or Affordable Housing Viability Assessment will be used to inform the Council's Policy approach and this comment will be considered accordingly.</p>
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b><i>Gypsy &amp; Traveller Need</i></b></p> <p>The Council should roll forward its current plan with amendments to ensure it is up-to-date with national policy.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council is currently undertaking evidence gathering in terms of housing and economic need at a strategic and local level and the findings of these studies will also inform policies related to Gypsy and traveller Need.</p>
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b><i>Older Persons' Housing</i></b></p> <p>Government states that there is a critical need to provide housing for older people. The Council is aware that the over-65s will soon be the fastest increasing demographic group</p>	<p>Noted.</p> <p>The Council is currently gathering evidence in terms of housing and economic needs at a strategic and local level. This new evidence will help to inform the</p>

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		<p>within the Borough, and accommodation provided for this group has been relatively low.</p> <p>Commercial organisations that specialise in building retirement accommodation do not have any developments in Wigston.</p> <p><b>Potential Options</b></p> <p>The Council should be able to require residential developments that meet the “large site” definition to provide homes for older people. However, some sites will be better than others in terms of accessibility. For example, a steeply sloping site or one far from facilities with poor transport links would not be suitable.</p> <p>Perhaps the developers of less suitable sites might be required to make an off-site contribution.</p> <p>Younger persons are more likely to rent. Smaller units under the heading of “affordable” are required.</p>	<p>Council’s Policy position, with the findings of these studies helping to inform evidence and policies related to all aspects of the Plan.</p> <p>In addition to this, the Council will also undertake a whole plan viability assessment, as well gather evidence for other aspects of the plan relating to infrastructure and housing choices. The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the emerging new Local Plan and by doing so, these discussions can begin to take place.</p> <p>With regards to the specific recommendations on where to locate older person housing, the comments will be considered accordingly as the preparation of the emerging new Local Plan document continues to progress.</p>
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b>Section 6: GREEN INFRASTRUCTURE</b></p> <p>1. The Council should continue with current Local Plan (LP) policy relating to Green Infrastructure, but with a much stronger emphasis on layouts that:</p> <ul style="list-style-type: none"> <li>• Encourage walking and cycling</li> <li>• Pedestrian and cycle links between new developments and existing estates</li> </ul>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p>

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		<ul style="list-style-type: none"> <li>• And between new developments and existing facilities, e.g. shops, health centres and schools</li> </ul> <p>These links should not be an afterthought, when building plots and road layouts for cars have already been set out, because that prohibits such links.</p> <p>The Meadows estate (Kelmarsch Ave) is a good example of not cramming as many houses onto an acre as possible, but leaving open green spaces of various shapes and sizes, interspersed between housing and incorporating old hedgerows and mature trees as well. The pedestrian/cycling routes to school are shorter than by car.</p> <p>The former estate for military families (Namur Road, etc.) has a “village green” – excellent.</p> <p><i>Para 4.7: “to protect and enhance existing biodiversity and reversing fragmentation of habitats by restoring the connectivity between them” etc.:</i></p> <ol style="list-style-type: none"> <li>2. Billy Cox’s land (orchard, field and allotment) forms a green lung in the centre of Wigston</li> <li>3. It is currently an unmaintained wildlife area</li> <li>4. It connects 2 green wedges in central Wigston: Peace Memorial Park, the adjacent allotments and the field between Moat Street and Blunts Lane, and All Saints school field and Willow Park.</li> <li>5. At some point in the next 15 years, Billy Cox’s land is likely to come on the market.</li> </ol>	<p>The specific examples of ‘good design’ in the Borough, as well as the recommendations to consider in more detail have been noted and will be taken into account accordingly.</p>

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		<p>6. Can some tentative thought be given to how this central area connecting two small green wedges be preserved as such. Are there charitable funds available so that it can be purchased for the benefit of local people and biodiversity?</p> <p>7. If not, could it be used for much needed social housing, by the Council or a Housing Association, with the retention of a green corridor between the two parks?</p>	
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b>Green Wedge</b></p> <p>1. The Council should roll forward current policy relating to GWs but should prohibit any built encroachments on existing boundaries.</p> <p>2. Any Review should look to how to increase these areas.</p>	<p>Noted.</p> <p>The Council will review all existing designations, including Green Wedges, as part of the emerging Local Plan.</p> <p>Therefore, this representation will be taken into account by the Council when reviewing the current Green Wedge Review.</p>
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b>Country Side</b></p> <p>1. The Council should continue with the existing criteria based policy, but include a strong preference that new developments should take place on brownfield sites, and countryside areas should be preserved.</p> <p>2. Any other forms of development in the countryside should allow access and promote activities that increase people's enjoyment of the countryside, e.g. canoeing on the canal; footpath maintenance and signing.</p>	<p>Noted.</p> <p>The Council will review all existing designations, including Countryside, as part of the emerging Local Plan.</p> <p>Therefore, this representation will be taken into account by the Council when reviewing the current Countryside Policy approach.</p>
Wigston Civic	7 <sup>th</sup>	<b>Sustainable Drainage and Surface Water</b>	Noted.

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Society	November 2021	Yes, roll forward Council policy, but many different agencies are involved in the management of Sustainable Drainage – clear lines of accountability need to be set between the agencies. There should be a system of enforcement, so that drains, culverts etc. are cleared of debris regularly.	<p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p> <p>The specific recommendations to improve and strengthen the relevant aspects have been noted and will be considered accordingly.</p>
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b>Flood Risk</b></p> <p>1. The Council should review the Strategic Flood Risk Assessment in its entirety: a piecemeal approach is inadequate.</p> <p>2. As more land is covered with brick, concrete and tarmac, flood risk has an impact over a wider area than one specific development.</p> <p>3. Flowing water is not piecemeal: it takes the easiest route.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p>
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b>Section 7 ENVIRONMENT AND SUSTAINABILITY (STRATEGIC CHALLENGES)</b></p> <p>It is extremely important that existing recognised geological and wildlife sites continue to be protected from development. All developments should be linked with surroundings to allow wildlife corridors and incorporate wildflower planting on verges</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance, including the Environment Bill.</p> <p>The Council will be undertaking evidence gathering</p>

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		<p>and other green areas. Planting of native shrubs and trees should be encouraged, together with areas of water.</p> <p><b>Potential Options</b></p> <p>The Council should roll forward current policy updated in line with current national policy.</p> <p>Perhaps the local Wildlife Trust could be asked to monitor biodiversity on new sites.</p>	<p>as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan, including protecting and enhancing the environment.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the Council’s approach have been noted and will be considered accordingly.</p>
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b>Climate Change</b></p> <p>The need to address this becomes increasingly urgent. Councils should be proactive in requiring developers to mitigate potential impacts of buildings on the environment.</p> <p><b>Potential Options</b></p> <p>The Council might draft a new policy to strongly encourage sustainable energy systems in all new developments. e.g., installation of heat pumps and solar panels instead of gas boilers. The new policy would, of course, take into account the latest national planning policy and guidance.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p> <p>The specific recommendations to improve and strengthen the Council’s approach have been noted and will be considered accordingly.</p>
Wigston Civic	7 <sup>th</sup>	<b>Section 8: INFRASTRUCTURE</b>	Noted.



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Society	November 2021	<p>1. Non-car transport and routes – walking, cycling and buses – should be designed and incorporated in plans at the very earliest stages, not as an afterthought when road layouts designed for car use are already set in tarmac. It is suggested that the Council appoints a planner with a remit to develop transport and travel alternatives to car use.</p> <p>2. Currently, developers design for car use first with alternative travel considered as an afterthought, it should be the other way round. The latest Newton Lane outline application is a good example where footpaths are fitted into the plan, not the plan around existing footpaths.</p> <p>3. The Council should consult specialist organisations on alternative transport methods on major developments, such as Ramblers and Cycling organisations as well as bus and train user groups and Friends of the Earth.</p> <p>4. A different mind set to 'just get in the car' needs to be promoted by the Council.</p> <p>5. Bus routes and convenient bus stops should be planned for any new development. It's not good enough to suggest that residents should take a half mile or more walk to catch a bus.</p>	<p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, Policy and Guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects relating to public transport, cycling and walking infrastructure have been noted and will be considered accordingly.</p> <p>The Council is also actively monitoring announcement from Active Travel England (ATE) and will seek to engage with them as appropriate, in due course.</p>
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b>Section 9: LOCAL HOUSING (LOCAL CHALLENGES)</b></p> <p><b>First Homes</b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts,</p>

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		<p>Provisionally, support proposal to require element of First Homes provision but retain requirement for affordable housing in new developments at 30%. However more evidence is required about the need for First Homes as opposed to general affordable housing in the borough to know if they will be of genuine benefit to the local community. Do we have enough information about the housing market when this relates to the wider Leicester area?</p>	<p>Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>In addition to this, the Council will also undertake a whole plan viability assessment, as well gather evidence for other aspects of the plan relating to infrastructure and housing choices. The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the emerging new Local Plan and by doing so, these discussions can begin to take place.</p>
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b><i>Technical Housing Standards</i></b></p> <p>The consultation notes that all new homes provided through permitted development rights must comply with the standards. We would agree with the requirement but also the need for enforcement measures. Re questions - proposing to continue policy requiring space standards re. conversions, but also to require all new homes to comply. We strongly support this given some of the poor quality of some proposed accommodation, especially in the rented sector. (Reference should also be to the importance of natural light and ventilation and outdoor amenity space).</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by</p>

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			<p>doing so, these discussions can begin to take shape.</p> <p>In addition to this, the Council will also ensure that a whole plan viability assessment is undertaken to evidence the emerging new Local Plan.</p> <p>The specific recommendations to improve and strengthen the Council's approach have been noted and will be considered accordingly.</p>
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b><i>Self and custom build</i></b></p> <p>We provisionally agree with the option to roll forward current policy (14) rather than require self-build on all major sites. However we would need to know the demand in the borough. Does the council register of those wanting plots to self-build show this?</p> <p>Q2 re. any other options: allocation for non-profit community groups could be considered.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The specific examples referenced will also be taken into consideration as the preparation of the emerging new Local Plan document continues to progress.</p>
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b><i>Sustainable Homes</i></b></p> <p>Government requiring thermal insulation and renewable energy – reduction of greenhouse gas emissions should be an important element of all plans and agree with the council's proactive approach. Also agree with requiring new development to minimise energy consumption via layout, building orientation</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The specific recommendations to improve and strengthen the Council's approach have been noted</p>

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		<p>massing and landscaping, which has not been apparent in some previous developments.</p> <p>We would suggest that consultations should be undertaken focussing on this aspect with community environmental groups and local residents at an early stage.</p>	<p>and will be considered accordingly.</p>
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b><i>Housing choices</i></b></p> <p>Government requires assessment of quantity and location of housing in relation to needs of different groups. The council specifically notes the need for more bungalows and retirement homes with which we agree and for new residential to consider the provision of sufficient space to work from home. We suggest that also needed is a policy re. building of extensions and annexes to existing homes for this purpose.</p> <p>We agree with the proposal to strengthen policy approach so homes fit for purpose 'to accommodate the full spectrum of health inequalities for people of all ages' – but more detailed information required for evidence base.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>In addition to this, the Council will also undertake a whole plan viability assessment, as well gather evidence for other aspects of the plan relating to infrastructure and housing choices. The Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the emerging new Local Plan and by doing so, these discussions can begin to take place.</p>
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b><i>Urban infill</i></b></p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance</p>

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		<p>Government requiring LA's to have strategy for accommodating (objectively assessed) housing needs which makes use of previously developed or brown-field land. The current policy approach could be rolled forward but be stronger in managing detrimental development with limitations in relation to residential garden land and amenity space and in areas of significance.</p> <p>The strategy should also assess the need for single person housing on small infill sites and appropriate densities in such locations.</p>	<p>with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p>
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b>Section 10 DESIGN AND CHARACTER</b></p> <p><b>High Quality Design</b></p> <p>Q1 This is a very subjective view and varies for different buildings. Clear lines and modern but sustainable materials should be used to fit the area.</p> <p>Q2 no view</p> <p>Q3 WCS strongly agrees that the Council should produce locally specific design guides. Too much bland national designs for housing are submitted by developers.</p> <p>Q4 The character of the area and the needs of the community must be defined first. eg need for bungalow type accommodation, decently spaced flats with good amenity areas especially in factory conversions.</p>	<p>Noted.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the Plan, including with regards to the inclusion of local design guide production and/or codes within the emerging Plan have been noted and will be considered accordingly.</p>
Wigston Civic Society	7 <sup>th</sup> November	<p><b>High Quality Construction and Use of Materials</b></p>	<p>Noted.</p>

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	2021	Q1 Must be option 1 Q2 As suggested plus use conditions, monitor performance by using enforcement procedures, updated if necessary.	The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b>Landscape Character</b></p> <p>Q1 Yes, the council should role forward the current policy. Q2 The council should ensure that there is provision for a subsequent review and amendment , if necessary, of the current policy.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level.</p>
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b>Local green Spaces</b></p> <p>Q1 Yes, the council should role forward the current policy. Q2 No view, as there has not been time to examine the current list of designated green spaces. Q3 If the land to the rear of 2-4 Leicester Road is not already designated, then it should be placed on the list. If this action is not currently legally possible then solutions should be looked into to make it possible.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, including the Local Green Space Review Assessment.</p>
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b>Design Codes</b></p> <p>Q1 and Q2</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>

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		It is suggested that there needs to be provision in the new local plan for local design codes to be proscribed but more detailed discussion on the options is needed first.	
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b><i>Renewable and low carbon energy production</i></b></p> <p>Q1 and Q2 We do not feel able to answer these questions but it would be interesting to know, and would assist in developing new policy, what elements have been built into recent large new build and rehab schemes, which reduce greenhouse gas production.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b><i>Public realm</i></b></p> <p>Q1 Have the detailed policy principles set out in the new local plan. Q2 More time would be needed to answer this question.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b><i>Shop fronts (including shutters)</i></b></p> <p>Q1 Yes Q2 No</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b><i>Section 12 HEALTH AND WELL-BEING</i></b></p> <p><b><i>Open spaces, sport and recreation facilities</i></b></p> <p>We would generally support rolling forward current policy but ensuring it is in line with wider government objectives re.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p>

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		<p>Social inclusion, community cohesion, promoting healthy, inclusive and safe places and recognises factors of age, gender, race and disability when assessing current and future provision. NPPF recognises the role of rights of way, green spaces and heritage assets which could be given more emphasis, including importance of street trees and verges. Re. new development and playing pitch strategy: developer contributions could relate not just to facilities but to provision of safe access to facilities. Many parks and other open spaces need to be assessed in terms of how useable/ accessible they are for all groups including women and girls. Playing pitches can dominate spaces and leave less room for informal gathering of families and friends.</p> <p>We would agree that it is also important to update the evidence base.</p> <p>Other options re provision in new development: could be linked to the accessible neighbourhood idea - ensure local green space within 5 min walk.</p>	<p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the Council’s approach have been noted and will be considered accordingly.</p>
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b><i>Built leisure facilities</i></b></p> <p>The council state that currently built facilities are sufficient but will review with Sport England in relation to population changes for longer plan period which we could support, but also note the need to consider accessibility both physical and financial. Re. the question Is there a deficiency in specific areas / of specific types of facility – this relates also to location and access for all groups – but more surveys required.</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p> <p>As part of this work, the Council will seek to engage</p>



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			and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b><i>Built health facilities</i></b></p> <p>Of the options, the first is preferred - that the council draft a new policy to address Built Health Facility needs in the borough taking account of national policy and local evidence – but also should do this for all local health and well-being requirements as set out above?</p> <p>Regarding the questions 1 and 2 applicable but more information needed re. adequacy of supply.</p>	<p>Noted.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to on or off site infrastructure delivery such as this.</p>
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b><i>Health Impact assessments</i></b></p> <p>Council states that development proposals should encourage walking and cycling but recent developments have not always achieved this e.g. re. use of footpath access to school.</p> <p>Health Impact statements – need to be closely monitored and if insufficient not accepted. They should take into account space standards in homes and outside amenity space Re. potential options: council should roll forward and strengthen existing policy in the local plan with reference to updated evidence base and work closely with relevant stakeholders as proposed.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by</p>

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			doing so, these discussions can begin to take shape.
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b>Section 14 HERITAGE</b></p> <p><b>Conservation areas</b></p> <p>Q 1 YES, we consider that conservation areas must be fully protected and policies must be strictly enforced.</p> <p>Q2 We would suggest that the area behind Mr Cox's shop at 2/4 Leicester Road should be protected and that the C A including the buildings themselves at this address should be extended OR some other way be found of protecting it for the benefit of the community. We suggest that Granville Road, Wigston should be made a conservation area.</p> <p>Q3 No, CAs are closely defined and definitely should not be removed in whole or in part.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to heritage, including Conservation Areas.</p>
Wigston Civic Society	7 <sup>th</sup> November 2021	<p><b>Listed and locally listed buildings</b></p> <p>Q1 Yes it should so as to continue to protect buildings in a constantly changing built environment.</p> <p>Q2/3 Agreed, it was extended in the last review and some buildings may have been missed. Furthermore, experience and time has taught us what to look for. In addition more research is needed on the origin of some buildings.</p>	<p>Noted.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to heritage.</p>

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			<p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p>
Zeph's Café, Oadby	28 <sup>th</sup> October 2021	<p><b>COMMENTS ON THE NEW OADBY AND WIGSTON LOCAL PLAN FROM ZEPH'S CAFÉ, OADBY</b></p> <p>Zeph's Café is based at Trinity Methodist Church, Harborough Road in Oadby. It is part of the Church but is run as a separate commercial entity.</p> <p>The Directors of Zeph's Café (and indeed the Church itself) objected strongly to the proposals for additional retail floorspace in Oadby Town Centre in earlier Local Plans. We also objected to the proposals to build new shops and housing on the East Street Car Park adjacent to Zeph's Café. Fortunately, these proposals were rejected by the Council when they came forward as more detailed proposals in the Local Development Order. Zeph's remains strongly opposed to any proposals for new retail floorspace in Oadby and the loss of any car parking spaces in the East Street Car Park by Zeph's Cafe.</p> <p>Responding specifically to the Issues and Options Paper on Economy, Retail and Leisure, we would very much agree that the growth of online shopping particularly in response to the pandemic means that there is clearly less need for retail</p>	<p>Noted.</p> <p>The Council would like to thank Zeph's Café in Oadby for taking time to read through the consultation documents and for responding.</p> <p>The Local Plan must be prepared in accordance with the relevant Government Acts, Regulations, policy and guidance.</p> <p>The Council will be undertaking evidence gathering as part of the new Local Plan at both a strategic and local level, with the findings of these studies helping to inform policies related to all aspects of the Plan.</p> <p>As part of this work, the Council will seek to engage and work in partnership with key stakeholders over the course of the drafting the Local Plan and by doing so, these discussions can begin to take shape.</p> <p>The specific recommendations to improve and strengthen the relevant aspects have been noted</p>

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		<p>floorspace. We believe that carrying out a new Retail Capacity Study will help to confirm this and provide evidence of current retail floorspace need. The presence of a substantial number of vacant retail units in Oadby indicates that there is already a greater supply of retail floorspace than is currently needed and we would expect this to be reflected in the new Local Plan.</p> <p>National and local planning policies stress the importance of having strong and vibrant town centres. The Local Plan's priorities should include helping to bring the vacant retail units in Oadby Town Centre back into use. Ideally, this should be for retail purposes but where this is not possible then other non-retail uses could be considered. These should represent a mix and range of uses – community, leisure, office etc and not just more cafes, bars or restaurants. It is essential that there is a variety and diversity within the Town Centre.</p>	<p>and will be considered accordingly.</p>