



CABINET – 26 MAY 2026

**RESPONSE TO BOROUGH OF OADBY AND WIGSTON
REGULATION 19 LOCAL PLAN CONSULTATION AND
DECLARATION OF UNMET HOUSING NEED**

**JOINT REPORT OF THE DIRECTOR OF GROWTH, ENVIRONMENT
AND TRANSPORT AND THE DIRECTOR OF CHILDREN AND
FAMILY SERVICES**

PART A

Purpose of the Report

1. The purpose of this report is to advise the Cabinet of the progress of the Oadby and Wigston Borough Council's Local Plan and to set out the County Council's proposed response to its Regulation 19 consultation. The report also sets out the County Council's position on the matter of the Oadby and Wigston Borough Council's declared unmet housing need.

Recommendations

2. It is recommended that:
 - a) The proposed timetable for the progression of the Oadby and Wigston Borough Council (OWBC) Local Plan is noted;
 - b) The declaration of an unmet housing need in OWBC is noted;
 - c) The County Council's formal response to the OWBC's Local Plan Regulation 19 consultation, set out in paragraphs 33 to 60, and the Appendix to this report be approved, noting in particular:
 - i. That the County Council is considering the draft Local Plan as presented to it, and it considers that it is for OWBC to demonstrate to the Inspector(s) at the Plan's Examination in Public why the Local Plan has been positively prepared in respect of the local housing need requirement (LHN), i.e. that the OWBC will need to demonstrate that there is a substantive evidence base to justify its conclusion that OWBC is unable to meet its LHN as calculated by the national standard method, based solely on highway reasons;

- ii. That the County Council has no fundamental issue with the Local Plan's Spatial Strategy, but as the Local Transport Authority (LTA) it considers that the transport evidence presented by the OWBC is not sufficiently granular in detail to be able to conclude that the OWBC's highway network would be severely congested if the area delivered housing over the Local Plan period equivalent to that calculated by the standard method;
- iii. The County Council's formal position on the matter of the OWBC's declaration of an unmet housing need, set out in paragraphs 46 to 57 of the report;
- d) The Director of Growth, Environment and Transport, following consultation with the relevant Cabinet Lead Members, be authorised to work with OWBC and other partners within the Leicester and Leicestershire Housing Market Area (HMA) to seek to agree to the most appropriate approach to addressing the OWBC's declaration of an unmet housing need and work through any substantive issues to resolution, to demonstrate effective and on-going joint working.

Reasons for Recommendation

- 3. The County Council's response sets out the key comments for consideration by OWBC in progressing its new Local Plan, seeking to influence the content of the Local Plan in the interests of local communities, including ensuring that the Local Plan provides an as robust as possible policy platform for securing the provision of the infrastructure and services that are required to support its successful delivery.
- 4. On 25 March 2026, new regulations came into force, which meant that the Duty to Co-operate would no longer apply to new, or emerging Local Plans. Notwithstanding this change, the National Planning Policy Framework (NPPF) (December 2024) still requires "maintaining effective co-operation" across administrative boundaries (paragraphs 26-29). Inspectors are expected to continue to examine plans in line with these policies.
- 5. The County Council is considering the draft Local Plan as presented to it. It does not intend to do any work of its own to demonstrate whether and if more than 240 homes per annum could be provided for and neither is it raising this as a matter in its proposed consultation response. Nevertheless, it is important that OWBC and other partners understand the County Council's position on this matter, in order to facilitate effective and ongoing joint working.

Timetable for Decisions (including Scrutiny)

- 6. OWBC has outlined a timetable for the submission of its Local Plan. It is anticipated that following the Regulation 19 Pre-Submission consultation and subject to approval of OWBC, the Local Plan would be submitted to the Secretary of State for examination by 12 June 2026.

Policy Framework and Previous Decisions

7. Details of relevant previous decisions and the related policy framework are set out in the original report.

Resource Implications

8. The County Council has committed significant resources to engaging in, and supporting, a collaborative approach to strategic planning in order to facilitate the delivery of growth within the County and to mitigate the negative impacts of development, to the extent that it is reasonably possible to do.
9. As set out in the report to the Cabinet in December 2025 on Strategic Spatial and Transport Planning, securing the delivery of infrastructure, transport or otherwise (such as education, waste and health), to support the needs of Leicester and Leicestershire's growing population is becoming ever more challenging, particularly where strategic transport and education infrastructure is required to seek to mitigate the cumulative impacts of development sites across a relatively wide area of the County. The County Council seeks to achieve a more coordinated approach to locations for growth and prioritisation of its delivery relative to the prioritisation of investment in the infrastructure and services necessary to support it.
10. As part of seeking to provide necessary infrastructure to support new and existing communities appropriately, the County Council recognises that having up to date Local Plans in place underpinned by appropriate policies and delivery strategies is the most effective way to fund and deliver infrastructure, maximising the contribution from the development industry and minimising potential negative impacts of unplanned growth.
11. The Director of Corporate Resources has been consulted on this report.

Legal Implications

12. The preparation and examination of Local Plans is governed by a statutory framework, associated regulations, and national policy and guidance, including the NPPF. In determining whether a Local Plan is "sound", the appointed Inspector(s) will consider, amongst other matters, whether the Plan has been positively prepared, is justified, effective and consistent with national policy.
13. The County Council's proposed response to the OWBC's Regulation 19 Local Plan consultation has been prepared having regard to this legislative and policy framework and reflects the County Council's role as LTA and its wider statutory responsibilities, including in respect of education and infrastructure planning.
14. The County Council must ensure that its representations are robust, evidence-based and consistent with the statutory tests and relevant national policy, noting that it will ultimately be for the Inspector(s) at Examination in Public to determine the soundness of the Plan.

15. There is a risk that, if the Local Plan is found unsound at Examination in Public, this may have implications for the delivery of development and associated infrastructure within the area. The County Council's response is intended to ensure that its statutory responsibilities and interests are appropriately represented in that process.
16. The Chief Legal Officer and Monitoring Officer has been consulted on this report.

Circulation under the Local Issues Alert Procedure

17. This report will be circulated to all Members.

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PART B

Background

18. The current OWBC Local Plan was adopted by OWBC in April 2019 and it covers the Plan period 2011 to 2031. A Local Authority seeks to keep its Local Plan up to date, otherwise it is at risk of unsustainable and un-planned development.
19. The preparation of new Local Plans involves various stages of consultation. This consultation from OWBC is known as a 'Regulation 19' consultation. It commenced on 17 April 2026 and will close on 29 May 2026.
20. This consultation builds on previous rounds of publication to develop the new Local Plan, in which the Council has responded to, these being:
 - a) Regulation 18A – Issues and Options (Autumn 2021).
 - b) Regulation 18B – Preferred Options (Spring 2024).
 - c) Regulation 19 – Pre-Submission Draft (Winter 2024).
21. This new Regulation 19 consultation is an updated version of the 'paused' Regulation 19 Pre-Submission Local Plan carried out in January to February 2025.
22. In the County Council's response to the previous Regulation 19 consultation that was reported to the Cabinet in February 2025, it was noted that OWBC had decided to pause progress on its Local Plan to consider updated housing requirements as set out in the new NPPF (December 2024). Nevertheless, the report set out that given the significant factors that were affecting the Local Plan from a transport perspective, the Plan in its current form, failed to meet the NPPF tests of soundness insofar as its effectiveness and consistency with national policy.
23. The NPPF sets out the presumption in favour of sustainable development for plan-making (paragraph 11 a) and b) i and ii). It states that all plans should promote a sustainable pattern of development that seeks to: meet the development needs of the area, align growth and infrastructure, improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects. It goes on to state that 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) The application of policies in this NPPF 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
 - ii) Any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

24. Paragraph 36 of the NPPF sets out the tests of soundness for Local Plans and SDSs. All four tests of soundness need to be met. The first test is being 'Positively prepared' which entails providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that an unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
25. Further references of direct relevance from the NPPF includes paragraph 129 regarding achieving appropriate densities, which refers to planning policies supporting development that makes efficient use of land taking into account various factors. These include local market conditions and viability and the availability and capacity of infrastructure and services (both existing and proposed) as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use.

Cross-boundary Cooperation and Declaration of Unmet Housing Need

26. On 25 March 2026, new regulations came into force which meant that the 'Duty to Co-operate' would no longer apply to new, or emerging, Local Plans. Notwithstanding this change, the NPPF (December 2024) still requires "maintaining effective co-operation" across administrative boundaries (paragraphs 26–29). Inspectors are expected to continue to examine plans in line with these policies. In this context, SoCGs remain an appropriate method to document cross-boundary strategic matters, record areas of agreement and disagreement, and set out next steps, demonstrating that effective and on-going joint working has taken place. This is particularly important for the County Council due to its responsibilities for highway and education matters, given the scale and criticality of the associated infrastructure dependencies.
27. In February 2026, prior to OWBC declaring an unmet housing need, the Cabinet approved the County Council becoming a signatory to a SoCG produced by the Leicester and Leicestershire local authorities relating to housing distribution following the NPPF and new Standard Method published in December 2024. The SoCG sets out the authorities' agreement that the Updated Housing Distribution Paper sets out the apportionment of Leicester City's unmet housing need across the Leicester and Leicestershire HMA, arising from application of the new Standard Method up to 2046. In the case of OWBC, it signed the SoCG in February 2026, setting out that:
 - a) OWBC has undertaken additional evidence gathering on housing capacity to assess developable and deliverable land within the Borough in light of the increase in LHN from 189 to 389 homes per year.
 - b) Based on the evidence available at the stage of writing this SoCG, and for the purposes of this SoCG only, it is assumed that OWBC can meet its own housing need from a land supply perspective but cannot accommodate any unmet need from Leicester City.
 - c) Further work is still being carried out by OWBC to assess the Borough's ability to accommodate the uplifted LHN, and once complete, the HMA authorities will need to consider its implications.

28. The Government calculated that LHN for OWBC is 389 dwellings per annum (or 6,613 homes over the plan period). OWBC has however, now formally declared an unmet housing need. It has published its own transport evidence that suggests that to deliver more than 240 homes per annum would have a severe impact on its highway network and that it would be contrary to the vision and spatial objectives for the Local Plan (see the overarching response set out further on in this report for the LTA's position on the OWBC's transport evidence). Therefore, OWBC considers that an evidenced unmet need exists of 149 dwellings per annum (or 2,533 homes over the plan period) and that this will need be redistributed around the Leicester and Leicestershire HMA. OWBC considers that delivering the higher number would lead to highway impacts to an unacceptable degree.
29. For a Local Plan to be found 'sound', it should be positively prepared and provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that an unmet need from neighbouring areas is accommodated where it is practical to do so, and that it is consistent with achieving sustainable development. This is set out in the Localism Act 2011 and NPPF (both the December 2023 and 2024 iterations).

Overview of Content of Oadby and Wigston Borough Council's Pre-Submission Draft Local Plan

30. The Local Plan sets out a strategy covering the period 2025 to 2042 and a housing target of 240 homes per annum over the 17-year period, which gives a total of 4,080 homes.
31. The SDS sets out an approach to encourage and enable the provision of new additional homes. In addition to the already-committed development, there are six new allocation sites which will contribute 3,015 homes:
- a) Land North of Newton Lane, Wigston - 900 homes.
 - b) Wigston Meadows Phase 3, Wigston – 500 homes.
 - c) Land North of Glen Gorse Golf Course, Wigston – 130 homes.
 - d) Land South of Gartree Road Strategic Development Area – at least 850 (as part of cross-boundary site in Harborough District, for 4,000 homes in total).
 - e) Land East of Stoughton Road, Oadby – 500 homes.
 - f) Land South of Sutton Close, Oadby – 135 homes.
32. In terms of employment, the OWBC's strategy for the Local Plan period is to effectively retain and roll forward the current Local Plan employment allocations. Therefore, no further land will be allocated for employment development.

Overarching Response to the Submission Draft Local Plan Document

33. For the avoidance of doubt, given the exceptional circumstance where this Local Plan is being brought forward on the basis of not providing for the OWBC's LHN requirement, this response is without prejudice to any position that the County Council might reach in respect of particular planning applications coming forward through the development management process.
34. The County Council is considering the draft Local Plan as presented to it. It is for OWBC to demonstrate to the Inspector at the Plan's Examination in Public why the Local Plan has been positively prepared in respect of LHN requirement, that is to demonstrate that there is a substantive evidence base to justify its conclusion that OWBC is unable to meet its LHN as calculated by the national standard method, based solely on highway reasons.
35. The County Council raises no fundamental issue with the Local Plan's SDS, as given the predominantly urban nature of OWBC there are extremely limited options in any event. However, as the LTA, it considers that the transport evidence presented by OWBC is not sufficiently granular in detail to be able to reach such a definitive conclusion that the OWBC's highway network would be severely congested if the area delivered housing over the Local Plan period equivalent to that calculated by the standard method.
36. The LTA welcomes in principle that this latest draft of the Local Plan now contains reference to development being brought forward on the boundary between OWBC and the District of Harborough in such a way to act as a first phase of a much greater vision for the south east of Leicester that will unlock significant strategic infrastructure, including highways, that will help mitigate the impacts of growth on OWBC (and more widely) in the longer-term. However, this draft Local Plan still fails to set out a clear and coherent policy basis for seeking to limit the impacts of future growth on the OWBC's road network (and more widely). That is, it still fails to set out a clear overall short-term to long-term 'transport strategy', including a funding mechanism, that would, amongst other things, support the delivery of strategic transport infrastructure in practice.
37. Furthermore, whilst the LTA also welcomes that certain changes have been made to the Local Plan to reference a Community Infrastructure Levy (CIL) that could help to support the delivery of transport interventions, although it lacks consistent references to a CIL, and the wording is not positively stated.
38. Both the failure to set out a clear strategy for dealing with its transport impacts and the lack of positivity in respect of how that strategy will be funded appears to run the risk of undermining the Local Plan's effective delivery. To seek to address this, the LTA would welcome the opportunity to work with OWBC to agree the proposed Main Modifications to the Local Plan, in order to ensure that the Local Plan can be found to be 'sound' insofar as its effectiveness and consistency with national policy. In the absence of such proposed Main Modifications the LTA's view would be that the Local Plan is unsound in these regards.

39. It is considered by the County Council that Policy 5 on Climate Change should be updated to reflect the County Council's new Climate Resilience Delivery Plan, which has replaced its Net Zero Action Plan. It is deemed that the Local Plan should make further references to climate change adaptation.
40. It is considered by the County Council that Policy 6 on Flood Risk and Sustainable Water Management requires amendment. The current wording continues to fall below the recommendations of the standing advice on preparing a flood risk assessment, whilst suggestions are made on revised text around surface water runoff rates.
41. County Council officers continue to work with OWBC on the policy wording around Health Impact Assessments and the wording that is presented which represents a uniform one-step approach that outlines the requirement of a Health Impact Assessment on development across the Leicestershire County area.
42. The approach taken to planning for future education provision in Leicestershire is set out in the School Places Strategy 2026-2031 (February 2026) and will be reflected in the next update to the Leicestershire Planning Obligations Policy (July 2019). The approach involves consideration of the cumulative impact of the whole range of proposed residential allocations and the proposed trajectories for those allocations in a specific borough or district council. This is used to arrive at requirements for additional pupil places, expressed as additional forms of entry to expand existing schools, or new schools required. Cross-boundary residential allocations and the potential impacts of residential allocations close to administrative boundaries are taken into consideration in arriving at confirmed education requirements.
43. Education officers have provided advice on a scale of provision of 240 dwellings per annum as set out in the Regulation 19 Local Plan and informed by housing trajectories provided by OWBC. For the cross-boundary strategic allocation with Harborough District Council at Land South of Gartree Road (Policy AP4 in the OWBC's Regulation 19 Local Plan), advice from Education has been based on an Urban and Civic School Trajectory from late 2025.
44. Education officers are of the view that the OWBC's Regulation 19 Local Plan embraces within policy wording the advice provided on education requirements arising from the proposed residential allocations in all respects other than for Land South of Gartree Road where the education requirements for the site are continuing to evolve.
45. Land South of Gartree Road (Allocation Policy 4) is a key allocation site which forms part of a cross-boundary development (with Harborough District) of 4000 homes in total. Positive master planning is considered essential to ensure that cross-boundary development is delivered within a consistent framework; to enable vision-led transport planning in accordance with the NPPF; to underpin the assessment of the development's impacts on infrastructure and services, including highways and transport, and education, and to demonstrate as to whether such impacts can be mitigated; to avoid land-locking development

elsewhere in the Strategic Growth Plan Priority Growth Corridor and to ensure improvements are made to multi-modal transport connectivity around the south and east of Leicester in the interests of achieving sustainable development. The County Council has consistently advised on the importance of this site as a 'gateway' to the delivery of the Strategic Growth Plan.

Matters Concerning Unmet Housing Need

46. Consideration of the OWBC's Regulation 19 Local Plan within the context of the guidance provided in the NPPF indicates that the Local Plan does not provide for the scale of housing provision indicated within the Plan period. Provision should be made for objectively assessed need as per the Standard Method published alongside the NPPF in December 2024. For OWBC this would entail the Local Plan providing for 389 dwellings per annum (dpa) (6,613 homes over the plan period) rather than 240 dpa (4,080 homes over the plan period), a difference of 149 dpa. This difference has been declared by OWBC as an unmet need.
47. Ideally, increased housing provision should be sought in the Regulation 19 Local Plan. However, an exception is sought in recognition of the geographically constrained size and the nature and character of OWBC; past annual housing completions achieved; the importance of access to key services in Leicester City for communities within OWBC and in Harborough District and Blaby District; the natural and built assets located within OWBC; and the transport challenges increased housing provision presents, which all point to the consideration of taking a longer-term view.
48. This longer-term view would look to take forward evidential work on a 'greater than district' geographic scale to identify long-term solutions across the HMA as agreed by the County Council's Cabinet in December 2025. This evidence would inform the preparation of the first SDS for Leicester, Leicestershire and Rutland.
49. The LTA has considered the draft Local Plan as presented to it. It does not intend to do any work of its own to demonstrate whether and if more than 240 homes per annum could be provided for and neither has it raised this as a matter in its proposed consultation response set out in this report. It also does not consider that seeking further transport work to be undertaken in this regard would be the most beneficial way forward, rather the most beneficial way forward is as set out below in paragraphs 50 to 54.
50. Regarding education matters, County Council officers have been working collaboratively with OWBC to identify education solutions on the basis of the future SDS and the 240 dpa as set out in the draft Local Plan. Any deviation from this overall figure, proposed location of development and/or alterations to housing trajectories would require consideration from officers, with any impacts and potential solutions needing to be fully assessed. This work has not been undertaken to date.

51. Under the presently prevailing spatial planning arrangements in Leicester and Leicestershire, this would represent an unmet housing need of potentially up to 149dpa (i.e. 389-240dpa). However, further to the Strategic Spatial and Transport Planning report to the Cabinet in December 2025, the County Council is working with Leicester City Council and Rutland County Council to take forward the development of an SDS.
52. A key reason as to why the Government has introduced SDSs as part of its wide-ranging planning reforms, is that delivering the housing need in England cannot be met without planning for growth on a larger than local scale, and that a nationally consistent system is needed to address the problem and set a planning framework that provides for the amount of development the Country needs. SDSs thus enable planning over a greater spatial area than a Local Plan based on a district boundary. Specifically in respect of OWBC, that means a Leicester, Leicestershire and Rutland SDS would not start from the position of attempting to allocate 390dpa in such a small, land-availability and infrastructure availability constricted area as OWBC.
53. Instead, informed by evidence, such as the scheme identification and development work approved by the Cabinet in December 2025, the development of the SDS will provide for the opportunity to plan for meeting the area's housing and other needs, including enabling infrastructure such as transport and education provision, in a holistic way across the entire Leicester, Leicestershire and Rutland area. Thus, the concept of an unmet housing need at a district level would no longer exist.
54. The Government has yet to make clear how the transition from current rounds of Local Plans (adopted and emerging, such as the OWBC's Local Plan), to a future SDS will work in practice. Nevertheless, it seems clear that Local Plans will not run for the full course of their intended lifetime, such as until 2042 in the case of the OWBC's Local Plan. Although the LTA's formal Regulation 19 response does not explicitly acknowledge this, nevertheless the response is implicitly based on the assumption that the Local Plan will have a relatively short shelf life; hence why, the LTA's view is that it would be most beneficial to focus time and resources on, amongst other things, taking forward evidential work to identify and underpin delivery of longer-term strategic transport interventions that address the current lack of orbital transport connectivity to the south and east of the City of Leicester (this is opposed to expending time and resources on more granular evidence work to establish more definitively the extent of any 'OWBC unmet housing need').
55. Until the SDS supersedes the Local Plans across Leicester, Leicestershire and Rutland, over that relatively short-term the mitigation of the transport impacts of growth on OWBC will be focused around bringing forward improvements to active travel, reflecting the South Leicester Area Cycling and Walking Infrastructure Plan; sustainable travel, including to reflect the Leicestershire Bus Service Improvement Plan and the approach taken to recent service reviews across Leicestershire; highway capacity improvements where necessary and achievable; and ensuring the Local Plan at the least does not fetter the bringing forward of longer-term strategic transport interventions and

ideally, wherever possible, actively enables the provision of such. Once again, this position is reflected in the LTA's formal Regulation 19 responses, such as that Main Modifications are required to the Local Plan that set out a clear and coherent policy basis (that is to set out a clear overall 'transport strategy') for seeking to limit the impacts of future growth on the OWBC's road network (and more widely).

56. However, the County Council recognises that should OWBC submit the Local Plan and its associated evidence base for Examination in Public as they stand, it will ultimately be for the appointed Inspector(s) to determine whether there is a substantive evidence base to justify the OWBC's conclusion that it is unable to meet its LHN as calculated by the national standard method, based solely on highway reasons. In the transitional period between plan-making systems and the emergence of SDS, it is unknown what guidance, if any, Inspectors have been given by the Planning Inspectorate. It is thus unknown at this stage how this Local Plan's Inspector will respond to the County Council's position. The County Council is aware that other Local Plans within the HMA have been submitted or are in later stages of development. There are therefore risks, but nevertheless at this stage the approach set out in this report, is considered to be the most positive and appropriate one in the circumstances.
57. In a circumstance where the Inspector(s) was (were) to determine that the evidence was not sufficiently substantive, and more granular work was then to be pursued, whilst the LTA is not speculating on its outcomes, it would need to include a more focused assessment of junctions along key corridors through OWBC, in particular, the A6 and A5199 corridors. Additional data collection (traffic surveys) would be required, and a detailed traffic model of OWBC would need to be built. This would enable a more granular assessment of junctions' performance in terms of their individual capacities and the interactions of queues and delays between them.

Next Steps

58. It is the view of the County Council that the Local Plan in its current form fails to meet the NPPF test of soundness in terms of being effective, consistent with national policy and positively prepared. It is anticipated however, that continued liaison between the County Council and OWBC has the potential to lead to a set of appropriate and satisfactory Main Modifications being agreed, including with regards to Allocation Policy 4 on Land South of Gartree Road Strategic Development Area, and more broadly, the setting out of a clear and coherent policy basis for seeking to limit the impacts of future growth on the OWBC's road network.
59. The County Council will continue to engage with OWBC and other partners in the Leicestershire HMA in seeking to agree to the most appropriate approach to addressing the OWBC's declaration of an unmet housing need.
60. The County Council will also continue to work with OWBC, and other partners where cross-boundary implications are relevant, to agree Main Modifications to the Local Plan as part of the examination process.

Equality Implications

61. There are no equality implications arising directly from the recommendations in this report.

Human Rights Implications

62. There are no human rights implications arising directly from the recommendations in this report.

Environmental Implications

63. The County Council will continue to work closely with OWBC and other partners to minimise the impact of the planned growth on the environmental assets of Leicester and Leicestershire.

Partnership Working and Associated Issues

64. The County Council works closely with the Leicester and Leicestershire Strategic Planning Partnership, which includes OWBC, the other six district councils in Leicestershire, Leicester City Council and the Leicester and Leicestershire Business and Skills Partnership.

Background Papers

Report to the Cabinet on 26 October 2021: Response to the Oadby and Wigston Borough Council New Local Plan Issues and Options Consultation

<https://bit.ly/4eWRIDO>

Report to the Cabinet on 16 December 2025: Strategic Spatial and Transport Planning

<https://bit.ly/4s1h1Lj>

Report to the Cabinet on 7 February 2025: Response to the Oadby and Wigston Local Plan (2020-2041) Regulation 19 Pre-Submission Consultation Draft

<https://bit.ly/4rJaCUD>

Report to the Cabinet on 3 February 2026: Leicester and Leicestershire Authorities – Statement of Common Ground Relating to Housing Distribution

<https://bit.ly/4rASsob>

Appendix

Response to Oadby and Wigston Regulation 19 Pre-Submission Consultation Draft Local Plan (2025 – 2042) – April 2026

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Leicestershire County Council

Response to Oadby and Wigston Regulation 19 Pre-Submission Consultation Draft Local Plan (2025 – 2042) – April 2026

<p><i>Overarching comments</i></p>	<p>The Local Transport Authority (LTA) recognises the importance of a Plan-led approach in general. It represents the best opportunity to seek to meet the needs of Leicester and Leicestershire’s growing and changing population in a managed way. The LTA therefore continues to commit significant resources to support district councils in the successful development and adoption of Local Plans, including to seek to ensure that sustainable growth is delivered in reality and that there is a robust policy basis for the LTA to seek developer contributions and Government funding towards transport interventions required to enable growth.</p> <p>More specifically, the LTA acknowledges that given the Borough of Oadby and Wigston is predominantly urban in nature, this imposes constraints both on the ability to identify sites to provide for growth and also on the ability to be able to upgrade/provide new infrastructure to enable that growth to come forward in practice. Much of the Borough’s road network, including key corridors such as the A6, are constrained and the ability to be able to improve the capacity of junctions, including on key corridors, to increase traffic capacity is likewise constrained. This places an ever-greater emphasis on the need to have an effective strategy in place that seeks to:</p> <ul style="list-style-type: none"> • maximise travel choices by means of active and travel modes in the shorter-term to more medium-term; and • in the longer-term seeks to deliver strategic transport interventions that address the current lack of orbital transport connectivity to the south and east of the City of Leicester, thereby opening up further opportunities for sustainable growth in that area. <p>However, as per the LTA’s responses to specific aspects of the Plan, as currently drafted it continues to fail to provide a coherent policy approach that seeks to address the issue of transport impacts.</p> <p>Notwithstanding the above, the LTA welcomes in principle that Oadby and Wigston Borough Council (O&WBC) has taken an evidence-based approach to seek to establish whether the Borough is able to accommodate its now identified housing requirement of 390 dwellings per annum (dpa); it is acknowledged that this requirement results from changes to the national Standard Method for calculating Local Housing Need (LHN), a method that takes no account of local geographies and circumstances.</p> <p>The LTA has no doubt (and for the avoidance of doubt is not questioning) that the transport consultants commissioned by O&WBC have performed competently and in good faith to fulfil the brief issued to them by O&WBC; neither is the LTA questioning the technical competency of the work undertaken by the consultants. However, the LTA considers that O&WBC’s current transport evidence is not sufficiently granular in detail to support the definitive conclusion drawn in the Plan that to provide for more than</p>
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240 dpa (as per the Borough's original LHN) would result in a severe highways impact. (For the avoidance of doubt, the LTA is not raising an issue with the Plan's spatial strategy; given the constrained nature of the Borough the LTA recognises that potential spatial strategy options are severely limited.)

Considerable further work (and cost) would be required to develop more granular evidence to demonstrate the validity of the conclusion drawn; this is a matter of consideration and judgement for O&WBC. However, in the interests of supporting the development and delivery of effective Local Plans (as the best means to seek to coordinate the delivery of growth and infrastructure so as to seek to limit the impacts of growth on local communities), it is the LTA's view that in the circumstances it would, on balance, be most beneficial to focus time and resources on:

- seeking to agree proposed Main Modifications (PMMs) to the Plan that set out a clear and coherent policy basis (that is sets out a clear overall 'transport strategy') for seeking to limit the impacts of future growth on the Borough's road network and more (widely) through:
 - seeking to maximise travel choices by realistic, safe and suitable means of active and sustainable travel in the shorter-term to more medium-term; and
 - through the longer-term delivery of strategic transport interventions that address the current lack of orbital transport connectivity to the south and east of the City of Leicester.
- taking forward evidential work to identify longer-term solutions, including as per the scheme identification and development work as approved by the [County Council's Cabinet in December 2025 \(Item 52\)](#).

Sites contained in the Plan (and in the emerging Harborough Local Plan - HLP) are already coming forward. It thus appears to be essential that O&WBC are proactive in working with the LTA and other parties as necessary, including Harborough District Council in respect of proposed allocation site AP04, Land South of Gartree Road, to agree a common and consistent set of PMMs. Otherwise, there appears to be a significant risk of growth coming forward in areas to the south and east of the City of Leicester that fails to support the delivery of and/or fetters the delivery of an overall 'transport strategy'. In turn, that would bring risks of potentially undermining the Plan's effective delivery (and potentially the HLP's effective delivery, too); also, the ability to bring forward strategic transport interventions that will help to address current and future forecast traffic conditions on the Borough's road network (and more widely).

In respect of developing PMMs, the LTA will expect them to reflect the purpose and policies of its [draft Enabling Travel Choice Strategy ETCS](#), consultation on which is presently underway. A key purpose of the ETCS is to set out the LTA's expectations for how the Government's [Better Connected – A Strategy for Integrated Transport](#), and the vision-led approach specified in the [National Planning Policy Framework](#) should be implemented in Leicestershire.

In respect of securing funding to deliver a Plan 'transport strategy', the Plan's new reference to a CIL (Community Infrastructure Levy) is welcomed in principle; this appears to address a concern raised by the LTA in respect of the last draft of the Reg19 Plan.

	<p>However, the Plan lacks consistent references to CIL, and the wording is not positively stated. (This in comparison to the far more positive wording of the adopted Charnwood Local Plan 2021 - 2037.) This appears to run a risk of undermining the Plan’s effective delivery. The LTA would welcome the opportunity to work with O&WBC to agree PMMs to address this matter.</p> <p>LTA concluding comments</p> <p><i>The LTA welcomes in principle that this latest draft of the Plan now contains reference to development being brought forward on the boundary between the borough of Oadby and Wigston and the district of Harborough in such a way to act as a first phase of a much greater vision for the south east of Leicester that will unlock significant strategic infrastructure, including highways, that will help mitigate the impacts of growth on the Borough (and more widely) in the longer term. However, this draft of the Plan still fails to set out a clear and coherent policy basis for seeking to limit the impacts of future growth on the Borough’s road network (and more widely). That is, it still fails to set out a clear overall short-term to long-term ‘transport strategy, including a funding mechanism, that would, amongst other things, support the delivery of strategic transport infrastructure in practice.</i></p> <p><i>Furthermore, whilst the LTA also welcomes that certain changes have been made to the Plan to reference a CIL (Community Infrastructure Levy) that could help to support the delivery of transport interventions, it lacks consistent references to CIL, and the wording is not positively stated.</i></p> <p><i>Both the failure to set out a clear strategy for dealing with its transport impacts and the lack of positivity in respect of how that strategy will be funded appears to run the risk of undermining the Plan’s effective delivery. To seek to address this, the LTA would welcome the opportunity to work with the Borough Council to agree proposed Main Modifications to the Plan.”</i></p>
<p>Section</p>	<p>Specific comments (please include paragraph numbers/page numbers where relevant)</p>
<p>Chapter 1: Introduction</p>	<p>(Minor editorial point: In paragraph 1.7.2 there is no longer a hyper-link to the Strategic Growth Plan.)</p> <p>Comments previously made around limited reference to Neighbourhood Plans (both at Reg.18 and previous Reg.19 stages) have not been taken on board. i.e. “As per comments made at Regulation 18, the document seldom mentions Neighbourhood Plans, and when it is, this has only been done when referring to national text. Whilst it is recognised that there are currently no Neighbourhood Plan groups within the Borough of Oadby & Wigston, it would be a positive addition to include references to encouraging and supporting future Neighbourhood Planning Forums being developed in area, especially in the absence of Town and Parish Councils. This will support empowering residences and maintaining individual community identities within future development.”</p>

	<p>It is suggested that under paragraph 1.8.4 ‘Objective 2 Our Communities’ an extra bullet point should be included – ‘Supports the development of Neighbourhood Plans’.</p> <p>See Governments’ Guidance on Neighbourhood Planning</p> <p>How should a local planning authority carry out its neighbourhood planning functions?</p> <p>A local planning authority should:</p> <ul style="list-style-type: none"> • be proactive in providing information to communities about neighbourhood planning.
Chapter 2: Spatial Portrait	
Chapter 3: Vision and Spatial Objectives	<p>Whilst not necessarily a matter of soundness, it would better represent relative responsibilities if the wording of this objective was to be amended thus: “<i>Whilst encouraging the reduction of private car use, we will work with Leicestershire County Council as the Local Highway Authority to seek to maintain the highway network within the Borough will be maintained at a level that ensures as reliable and free flowing movement of vehicular traffic as possible.</i>”</p>
Chapter 4: Overall Development Strategy	<p>The LTA is not raising an issue with the Plan’s spatial strategy. However, please see its overarching response and responses to allocation site policies, plus specific responses to aspects of Chapter 4.</p>
Policy 1: Spatial Strategy for Development within the Borough (Strategic)	<p>Paragraph 4.2.3. - Public Health welcome the identified risks from congestion and support minimising congestion also from a health perspective.</p> <p>The Chief Medical Officer’s Annual Report 2024, Health in Cities, and the Chief Medical Officer’s Annual Report 2022, Air Pollution, identify transport and traffic-related air pollution as key determinants of health in urban areas, while the Royal College of Physicians’ report A Breath of Fresh Air (2025) highlights road traffic congestion as a major and preventable source of harmful air pollution, reinforcing the conclusion that reducing congestion can improve population health and help tackle health inequalities.</p> <p>Public Health would be happy to provide further support to OWBC on congestion and health outcomes.</p> <p><i>Para’ 4.1.3: To highlight the transport connectivity relationship between the places stated, it is proposed that the wording of this paragraph should be modified thus: “The Borough has a unique and close spatial relationship with Leicester City, Harborough District and Blaby District., this in particular with particularly in regard to supporting the local economy, shaping strategic green infrastructure, and influencing how residents live out their day to day lives, including the need to travel to access services and facilities in places beyond the Borough’s boundaries. This close relationship is something that the Borough is seeking to conserve and enhance where possible.</i></p>

Para' 4.2.3: The County Council as the Local Transport Authority considers that the transport evidence presented by the Borough Council is not sufficiently granular in detail to be able to reach such a definitive conclusion that the Borough's highway network would be severely congested if the area delivered housing over the Plan period equivalent to that calculated by the standard method.

(NB: To avoid a continuous repetition of this same point, this response relates to all references in the Plan to the Borough Council's transport evidence and/or where assertions are made in the Plan that the delivery of more than 240 dpa would result in a severe highways impact.)

Para' 4.2.9: The sentiment of the final sentence is noted. As per responses made on other aspects of the Plan, it will be important for the Plan to contain policies that seek to ensure that the sentiment is achievable in reality (that is development is brought forward in such a way to act as a first phase of a much greater vision for the south east of Leicester that will unlock significant strategic infrastructure, including highways, that will help mitigate its impact on the Borough in the longer term). Please see further responses to other aspects of the Plan in this regard.

Additionally, it is suggested that the wording of the paragraph would benefit from further clarity, viz: *"...However, although all of the impact of the development will be seen by the Borough area, and it will add to significantly add to the highway impacts seen, this development is seen as a first phase of a much greater vision for the south east of Leicester that will unlock significant strategic infrastructure, including highways, that will help **to address the current lack of strategic orbital connectivity to the south and east of the City of Leicester, and** mitigate its impact on the Borough in the longer term, therefore the Borough area, is accepting 'short term pain, for longer term gain'."*

Para' 4.2.21: Notwithstanding the responses provided with regard to the Borough's transport evidence, the statement that *"The Local Highways and Transport Assessment (LHTA, 2025), recognised that although there will be significantly increased traffic levels on the surrounding roads and junctions of each allocated growth area, the impact will not be severe or unacceptable when delivering 240 dwellings per annum in the Borough."* has the potential to be significantly misleading if other parties were to read it as implying that because there are (as the Plan text presently asserts) no severe impacts, by extension there are no justifiable grounds for transport interventions to be sought to enable the delivery of growth within the Borough.

Para' 4.2.24: As presently drafted this paragraph does not appear to reflect the sentiment of para' 4.2.9. Therefore, it is proposed that it should be modified thus: *"As mentioned above, the site is very much a first phase of a much larger growth vision for this area of Leicestershire. It is therefore crucial that this site **comes forward in such a way so as to be able to achieve** ~~will deliver~~ a link road that will, in time, **have the ability to serve as a strategic link to open up** ~~link up with~~ future phases **of sustainable growth** and site allocations, **and** to relieve the traffic that it will generate."*

<p>Policy 2: Regeneration Schemes and Large Scale Change (Strategic)</p>	<p>The LTA would welcome an opportunity to explore how references to its draft Enabling Travel Choice Strategy could be incorporated to this Policy and supporting text. This with a view to agreeing proposed Main Modifications.</p>
<p>Policy 3: Infrastructure and Developer Contributions (Strategic)</p>	<p>The last draft of the Reg19 Plan included in clause 6: “<i>..The Council will give consideration to the cumulative impact of a proposal, particularly if a proposed new development is likely to come forward in staged phases or if it is within the site boundary or immediately adjacent to another new or recent development proposal.</i>” This text has been omitted in the latest draft without an immediately obvious replacement elsewhere. This deletion is unhelpful in respect of ensuring that the Plan’s policies are effective in addressing cumulative impacts (transport or otherwise).</p> <p>The inclusion of reference to the preparation of a CIL (Community Infrastructure Levy) Charging Schedule is welcomed in principle as it appears to be helpful in addressing one of the County Council’s, as the Local Transport Authority, key concerns about the last(Jan 2025) draft Regulation 19 Plan. (That is the previous draft Plan lacked any coherent approach to seeking to secure developer contributions towards the delivery of transport measures necessary to address cumulative and/or cross-boundary impacts.)</p> <p>However, in the light of its comments on para’ 4.2.9 the County Council would welcome:</p> <ol style="list-style-type: none"> 1. The opportunity to explore with the Borough Council the wording of the Policy (and supporting text as necessary) both in the light of the CIL wording used in the now adopted Charnwood Local Plan and the equivalent Main Modifications proposed to the Harborough Local Plan, with a view to agreeing proposed Main Modifications. 2. The Borough Council providing further detail about: <ol style="list-style-type: none"> a. The types of infrastructure a CIL is intended to cover. b. The timetable for introducing a CIL. 3. The opportunity to be involved in the development of the CIL Charging Schedule, including to understand how the setting of CIL levels has been / or will be informed by viability considerations. <p>(Page 34) 4.6.5 The Council’s Infrastructure Delivery Plan (IDP) contains a ‘live’ infrastructure project list. The document identifies all local and strategic infrastructure deemed necessary to support sustainable delivery of growth in and adjacent to the Borough over the Plan period to 2042. Ongoing joint working with neighbouring local authorities and other key agencies such as utility companies or service delivery partners will continue to be a key element to identify and to successfully deliver necessary infrastructure over the Plan-period.</p> <p>In relation to the above existing text and reference to joint working with neighbouring local authorities to successfully deliver infrastructure, the LCC waste service, as WDA, puts forward the below statement:</p>

	<p>LCC does not currently have plans to build further waste infrastructure in the county. It is not possible to know the future impact on capacity at the RHWS sites and considerations of future changes would always need to be taken into account. However, at the appropriate time there would be a subsequent need for LCC and the O&WBC to work effectively together to manage the future need for additional waste infrastructure, bearing in mind also emerging planned development in adjoining authority areas, in particular Harborough District and Blaby District.</p>
<p>Chapter 5: Combating Climate Change</p>	
<p>Policy 4: Sustainable Development (Strategic)</p>	<p>No specific reference made in the list of the spatial objectives on page 38 to conserving and reusing resources more efficiently. Rather this is included under the climate change objective.</p> <p>Suggest adding in the text highlighted in yellow to 5.2.2 (page 38)</p> <p>5.2.2 Pursuing sustainable development in the Borough involves seeking positive improvement in the quality of the built, natural, and historic environment, as well as in people’s quality of life, including (but not limited to):</p> <ul style="list-style-type: none"> • safeguarding minerals and minimising and reusing waste
<p>Policy 5: Climate Change (Strategic)</p>	<p>Paragraph 5.4.8 (page 41): LCC no longer has a Net Zero Action Plan but has been replaced by a Climate Resilience Delivery Plan. The relevant part of the website (https://www.leicestershire.gov.uk/environment-and-planning/environmental-policies-and-reports) is awaiting an update; the Net Zero Roadmap and Strategy remain valid and can be referenced but reference to the Action Plan should be replaced with the Climate Resilience Delivery Plan. Please note also that the 2045 NZC target for Leicestershire was moved to 2050.</p> <p>Policy text points (g)-(k) (page 42-43):</p> <ul style="list-style-type: none"> • It is recommended that the policy makes clear that a climate statement will be required to address the policy with any application and this should address climate adaptation as well as mitigation. • It is suggested that these points could offer a little more in terms of tangible requests to developers so that adaptation is not overlooked. For example, new homes should have measures designed in now that prevent overheating such as external shutters or blinds on south facing windows. Regarding efficient use of water, stipulate a target such as 95 litres/person/day. To mitigate the urban heat island effect, minimise new hard standing and instead specify soft landscaping or rain gardens that could also maximise surface water retention. To reduce flood risk, state what events must be designed for and stipulate retention of surface water within the boundary of the site to mitigate downstream flood risk.

	<ul style="list-style-type: none"> The mention of resilient communities and reducing inequality in this section is very much welcomed but, again, what is being stipulated? Citing examples of acceptable design features would increase likelihood of inclusion. E.g. green infrastructure should be designed in to schemes at an early/master planning stage. <p>Typos: point f) should say the ‘latest adopted version of the Local Nature Recovery Strategy for Leicestershire, Leicester and Rutland.</p>
<p>Policy 6: Flood Risk and Sustainable Water Management (Strategic)</p>	<p>Paragraph 10 (e) continues to fall below the recommendations of the standing advice on preparing a flood risk assessment - https://www.gov.uk/guidance/flood-risk-assessment-standing-advice Please consider ensuring floor levels are set at least 300mm above the estimated 1% AEP flood level plus climate change allowance.</p> <p>Paragraph 11 – Please can you add a reference to the June 2025 published ‘national standards for sustainable drainage systems (SuDS)’, which is now carries a lot of weight due to its referencing within PPG. https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds</p> <p>Paragraph 15 – Thank you for incorporating the 20% reduction in surface water runoff rates requirement. Following further consultation with Harborough DC over the past year, we have gone through various iterations of the wording of this policy. Please can you consider rewording the final sentence of this policy to:</p> <p><i>“for all development (including brownfield), demonstrate that the peak surface water runoff rate is limited to the Qbar greenfield rate (minus 20%), or to a rate which mitigates the risk of blockage, whichever is greater.” (LLFA preferred wording)</i></p> <p>For transparency, Harborough DC did raise a preference for the use of less technical language, preferring to avoid the term Qbar. The LLFA tried to push back on this as this language as many Local Plans across the country include the word Qbar. However, we appear to have settled on the below. Please note the options in brackets for different terminology. As stated, the LLFA’s preference is for the above wording which is more concise.</p> <p><i>“All development (including development on brownfield land) must manage surface water so that runoff is reduced compared to the site’s natural greenfield condition and does not increase flood risk. Peak surface water runoff must be limited to at least 20% below the site’s average [or use the word ‘mean’] annual peak [or use the word ‘maximum’] greenfield runoff rate, calculated using recognised national methods and in accordance with LLFA guidance.” (Final suggesting wording to HDC)</i></p> <p>Any changes to wording may need to be reflected in specific allocations for consistency.</p>

Policy 7: Preventing Pollution (Non-Strategic)	Policy 7 explicitly includes noise sensitivity considerations and mitigation measures, which is welcome.
Policy 8: Renewable and Low Carbon Energy (Non-Strategic)	Policy text point (1) (page 53): Inclusion of a 10% renewable energy generation requirement is welcomed but it is suggested that this could be increased to maximise resilience to fossil fuel based price shocks that are outside of households' control. Minimising dependence on gas is particularly important in increasing social and economic resilience.
Chapter 6: Housing	
Policy 9: Affordable Housing (Strategic)	Recognise a sliding scale of affordable housing requirements is set out in Policy 9 based on evidence, ranging from 10% to 30%, Where possible the Borough Council is encouraged to seek affordable housing provision towards the higher end of this range to enable sufficient provision to be made for communities.
Policy 10: Housing Density (Strategic)	Support use of criteria set out in the High Quality Design policy of the Plan, as well as using The National Design Guide and the Borough's Local Design Code to incorporate good design principles, and would encourage strengthening the policy intent to achieve higher residential densities wherever possible.
Policy 11: Gypsy, Travellers and Travelling Showpeople (Strategic)	Policy 11 makes reference to air quality assessment levels, which is welcome. This is particularly positive given the vulnerability of this community and the recognised risk of worsening health inequalities within this population.
Policy 12: Housing Choices (Non-Strategic)	In respect of Clause 5 of the Policy, even in a predominately urban Borough such as Oadby and Wigston, the extensive provision of fully LTN 1/20 compliant walking, cycle and wheeling infrastructure is unlikely. Whilst the Local Transport Authority is ambitious to deliver high quality walking, cycle and wheeling infrastructure, the ability to achieve full LTN1/20 compliance always needs to be balanced against factors such as: <ul style="list-style-type: none"> • Affordability. • Practical ('on the ground') constraints. • Delivering nothing vs. delivering something that is safe and fit for the purposes of meeting a community's evidenced needs whilst not necessarily fully compliant with standards.
Policy 13: Self and Custom Build (Non-Strategic)	
Policy 14: Retention of Existing Dwellings (Non-Strategic)	
Policy 15: Retention of Specialist Housing (Non-Strategic)	
Policy 16: Provision of Homes in Multiple	The County Council would welcome the opportunity to explore with the Borough Council the wording of the Policy (and supporting text as necessary) to consider whether it would be appropriate for it to include highway safety and accessibility,

Occupation (HMO's) (Non-Strategic)	especially in respect of potential levels of car parking that HMO's might generate. This with a view to the potential need to agree proposed Main Modifications.
Policy 17: Urban Infill Development (Non-Strategic)	
Chapter 7: Commercial Development	
Policy 18: Management of New and Existing Identified Employment Areas (IEA) (Strategic)	
Policy 19: Retail and Related Policies (Non-Strategic)	<p>Policy 19 has a clearer and more consistent emphasis on reducing car dependency through walking, cycling, access to local services and public transport. The requirement for local centres on larger allocations, alongside stronger policy wording on mitigating transport impacts, supports physical activity and helps address transport-related health inequalities.</p> <p>The County Council would welcome the opportunity to explore with the Borough Council the wording of the Policy (and supporting text as necessary) in respect of how the role of the Borough's 'town centres' (Wigston Town Centre, Oadby District Centre, South Wigston District Centre) might have to adapt/evolve/flex/grow to provide for the future needs of residents of strategic growth areas in adjoining districts could be indicated in it. Whilst reflecting national retail policy steer the role of these centres as 'leisure hubs', 'work hubs', 'transport hubs' needs to be clearly articulated. This with a view to seeking to agree proposed Main Modifications.</p> <p>Reference could be made to the wide range of quality independent retailers on offer.</p>
Policy 20: Hot Food Takeaways (Non-Strategic)	Policy 20 now clearly sets out that permission will not be granted within walking distance of schools and in other specified locations. While this does not go beyond the revised NPPF wording, it reinforces clear messaging that applications should not be submitted in these circumstances, which should help reduce reliance on public health input at the application stage.
Chapter 8: Transport and Community Infrastructure	<p>Across Policies 21 and 22, there is a clearer and more consistent emphasis on reducing car dependency through walking, cycling, access to local services and public transport. The explicit reference to the adopted Air Quality Strategy 2025–2029 in Policy 21 further reinforces the links between transport, environmental quality and population health.</p> <p>Overall however, it is unclear at present as how the policies in this chapter will help to give effect in practice to the sentiment in para' 4.2.9. That is neither the policies nor supporting text make any reference to the unlocking (delivery) of strategic transport infrastructure that will help mitigate the impacts of growth on the Borough in the longer term. Neither does this chapter cross-</p>

	<p>reference or reflect Policy 3 in respect of the preparation of a CIL Charging Schedule. At the least, this appears to be a significant inconsistency in the Plan; at the worst it appears to risk undermining the effectiveness of the Plan in delivery in practice the sentiment of para' 4.2.9.</p> <p>The County Council would welcome the opportunity to discuss and agree with the Borough Council proposed Main Modifications to the Plan that would make the Plan effective in supporting the delivery of strategic transport infrastructure that will help mitigate the impacts of growth on the Borough in the longer-term.</p>
<p>Policy 21: Sustainable Transport and Initiatives (Strategic)</p>	<p>Policy text (page 87-88): Suggested that there should be links made with other relevant policies or additional points added if necessary to ensure that measures are incorporated that shield infrastructure from the impacts of climate change. For example, use of SuDS, effective and well mapped drainage of roads, clear management responsibilities for SuDS upkeep or shading of roads with trees to limit road melt during heatwaves.</p> <p>See overall response on this Chapter.</p>
<p>Policy 22: Active Design and Travel (Strategic)</p>	<p>See overall response on this Chapter.</p>
<p>Policy 23: Improving Health and Wellbeing (Strategic)</p>	<p>Public Health have provided a direct response to planning officers at OWBC, regarding a request to change wording to policy 23. Public Health provided comments 21.04.2026. As discussed, and to re-iterate the proposed changes, the requested changes to Policy 23 are included below. As discussed, this wording represents a uniform one-step approach outlining the requirement of a Health Impact Assessment on development across Leicestershire County area.</p> <p>Policy supporting text paragraph 8.5.1 change to:</p> <p><i>8.5.1 There are multiple factors that contribute to health and wellbeing, and although not the sole determinant in health, the planning system has a role to play in promoting health and wellbeing. This Policy sets out a threshold for the requirement of a Health Impact Assessment, as well as a range of health-related issues that new development needs to address which can contribute to better health.</i></p> <p>Policy supporting text paragraphs 8.6.12 – 8.6.15 replaced with:</p> <p><i>8.6.12 Like other Local Planning Authorities in Leicester and Leicestershire, the Borough Council has worked collaboratively with the Public Health Team at Leicestershire County Council to ensure that delivering healthy and safe communities is a golden thread running through the entire suite of policies in this Local Plan.</i></p>

	<p>8.6.13 Due to the unique size and nature of the Borough, all forms of new development that occur in this area has a cumulative impact upon local resources and services, in this instance, upon health. This Policy takes a proportionate approach, setting a threshold requirement for the completion of a HIA.</p> <p>8.6.14 In the completion of a HIA, the Leicestershire HIA template is to be used, and is available on the Leicestershire County Council HIA webpage.</p> <p>Policy text, changes to paragraphs 2 and 3:</p> <p>2. Major development proposals are more likely to impact on health and wellbeing. As such, a Health Impact Assessment will be required for the following types of applications:</p> <ul style="list-style-type: none"> a) Residential development proposals of 50 dwellings or more, or residential sites with an area of 1 hectare or more b) Non-residential development for new or net additional floorspace of 1,000 sqm or more or non-residential development on sites of 1 hectare or more c) Development in areas of public health concern including areas vulnerable to worsening health inequalities (as indicated in the guidance notes on the Leicestershire County Council webpage) <p>3. A local HIA template and guidance has been developed by the Leicestershire County Council Public Health team. The level of information required in the HIA will be proportionate to the scale and nature of the development proposed. The Leicestershire HIA template is to be used, and is available on the Leicestershire County Council HIA webpage.</p> <p>It is recommended that Health Impact Assessments should consider climate related health risks posed by a development such as heat stress and poor air quality. This could be set out in the supporting text (pages 91-93).</p>
Policy 24: Car Parking and Electric Vehicle Charging (Non-Strategic)	
Policy 25: Community Facilities and Indoor Sports Facilities (Non-Strategic)	
Policy 26: Open Space, Outdoor Sport and Recreational Facilities (Non-Strategic)	Reference should be made to Brocks Hill Country Park, Botanic Garden and Attenborough Arboretum, Leicester Golf Course and Leicester Racecourse.

Chapter 9: Design and The Built Environment	
Policy 27: Public Realm (Strategic)	<p>Wording for Paragraph 9.2.5 should be amended as follows:</p> <p>Public realm schemes may often need to make provision for vehicular movements, especially for the purposes of servicing. In that context, the use of the phrase ‘All public Public realm schemes’ does not appear to be appropriate. It is suggested that the wording should be amended thus: “<i>Public realm schemes will need to prioritise, as appropriate, active travel, public transport, provision for the disabled over other modes, whilst still maintaining safe and suitable access for any servicing requirements. and They must also be designed to ensure the minimum amount of unnecessary street clutter such as road signs and bollards. This is important in encouraging active travel and making it more accessible as a mode of transport. Manual for Streets II (or up-to-date equivalent) offers further guidance in this regard and should be considered when designing proposals.</i>”</p>
Policy 28: High Quality Design and High Quality Materials (Non-Strategic)	<p>We are supportive of the inclusion of efficient use of natural resources within the bullet points in paragraph 9.4.8</p> <p>We are supportive of the wording in paragraph 9.4.13</p> <p>We are supportive of the wording in paragraph VIII - Homes and Buildings: Functional, healthy and sustainable, point (e)</p> <p>Wording in paragraph IX - Resources: efficient and resilient, could be strengthened by reference to sustainable building materials and the reuse of materials in all developments.</p>
Policy 29: Landscape and Character (Non-Strategic)	
Policy 30: Culture and Historic Environment Assets (Non-Strategic)	<p>The Draft Local Plan could make more of the identity and sense of place of Oadby & Wigston. There is no sense of local distinctiveness. It has been described as the southern gateway to Leicester & Leicestershire and although a small borough, is rich in history. Wigston has medieval roots whilst Oadby grew into a fashionable suburb for the 19th century factory owners of Leicester’s shoe and stocking manufacturers. It provides a link between the bustle of the city and the more rural landscapes of Harborough. https://visitleicester.info/places-to-go/oadby-and-wigston/</p>
Policy 31: Development in Conservation Areas (Non-Strategic)	
Policy 32: Sustainable Design and Construction (Non-Strategic)	<p>We are supportive of the wording in paragraph 9.16.1, paragraph 9.17.5 and points 2, 3, 4 and 5 within policy 32.</p>

	The policy text (page 126-127) would benefit from mention of the importance of climate change adaptation, noting, for example, how the materials chosen and building services specification helps in mitigating climate risk such as internal overheating.
Policy 33: Phone Masts (Non-Strategic)	
Chapter 10: Natural Environment	
Policy 34: Green and Blue Infrastructure (Strategic)	<p>This policy is welcomed and the mention of climate change adaptation in point 4(f) supported. It is suggested that more detail on how green infrastructure is expected to be used to support the area's adaptation could be provided. For example, green SuDS that enhance surface water absorption while delivering quality of life benefits for local residents or tree planting that provides shade in key areas to reduce the heat island effect.</p> <p>It is also recommended that provenance of species be taken into account to ensure that planted areas can thrive in hotter, drier summers and milder, wetter winters. Maintenance agreements should allow for the replacement of planting that does not survive into maturity.</p> <p>Point 4 c) - The Local Nature recovery Strategy is for Leicestershire, Leicester and Rutland not just Leicestershire.</p>
Policy 35: Protecting Biodiversity and Geodiversity (Strategic)	<p>Point 10.3.1 – it is queried whether the wording ‘encouraged’ is strong enough. The current requirement is ‘to have regard for the LNRS’ soon to be upgraded to ‘take account of’. OWBC are also subject to the Biodiversity Duty which requires all LAs to conserve and enhance biodiversity and will need to demonstrate what actions they have taken to do this in their Biodiversity Report.</p> <p>Point 8 & 11 (p 135) - Should say the Local Nature recovery Strategy for Leicestershire, Leicester and Rutland.</p>
Policy 36: Local Green Space (Non-Strategic)	Reference should be made to Brocks Hill Country Park, Botanic Garden and Attenborough Arboretum.
Policy 37: Green Wedges (Strategic)	Support the continued use of Green Wedge policy, an effective strategic planning policy tool which recognises the connectivity of green areas within and outside the Borough and the value to communities.
Policy 38: Countryside (Non-Strategic)	
Policy 39: Trees, Woodlands and Hedgerows (Non-Strategic)	There is no mention of the protections on trees with TPOs (either County or district TPOs). Also, no mention of any protections on trees that are within a Conservation Area.

Policy 40: Soils and Agricultural Land (Non-Strategic)	
Chapter 11: Regeneration Areas	
Regeneration Policy (RP1): Kilby Bridge Settlement Envelope (Non-Strategic)	
Chapter 12: Allocation Sites	<p>The Borough Council’s own transport evidence supports other evidence, such as the South Leicestershire Joint Transport evidence, that highlights the significant pressures that the road network in south Leicestershire is already under; the evidence further demonstrates the impacts of the additional travel demands forecast to be generated by Leicester and Leicestershire’s growing population.</p> <p>However, whilst para’ 4.29 sets out a sentiment of achieving the mitigation of the impacts of growth via a long-term approach of delivering strategic transport infrastructure, as per comments on other aspects of the Plan, at present it does not contain policies that would give effect to the achievement of the sentiment in reality. This appears to risk undermining the effectiveness of the Plan’s delivery in practice of the sentiment of para’ 4.2.9.</p> <p>Furthermore, whilst various references in site specific allocation policies to active and sustainable travel are welcomed, in the main, the references are generic and repetitious of each other (i.e. they are mostly not site bespoke); taken as whole the Plan still lacks a clear strategy for dealing with the impacts of growth in the shorter term. This again appears to risk undermining the effectiveness of the Plan’s delivery in practice.</p> <p>The County Council would welcome the opportunity to discuss and agree with the Borough Council proposed Main Modifications to the Plan that would make it effective:</p> <ul style="list-style-type: none"> • in setting out an overall short-term strategy for transport provision to enable its delivery; and to • support the delivery of strategic transport infrastructure that will help mitigate the impacts of growth on the Borough in the longer term.
Allocation Policy 1 (AP1): Land North of Newton Lane, Wigston (Strategic)	See overall response on this Chapter.

<p>Allocation Policy 2 (AP2): Wigston Meadows Phase 3, Wigston (Strategic)</p>	<p>See overall response on this Chapter.</p> <p>Additionally, Policy text 2.j) - Wording should be amended to “Provision of 1 Ha of land (adjacent to WMP2) and a financial contribution towards a new early years and primary school (as identified by Leicestershire County Council) increasing capacity at an appropriate location (namely Wigston Meadows Phase 2), to ensure that the new development does not have a negative impact on the local community accessing early years and primary education in the Borough.”</p>
<p>Allocation Policy 3 (AP3): Land North of Glen Gorse Golf Course, Wigston (Strategic)</p>	<p>See overall response on this Chapter.</p>
<p>Allocation Policy 4 (AP4): Land South of Gartree Road Strategic Development Area (Strategic)</p>	<p>The County Council will continue to work with Oadby and Wigston Borough Council and Harborough District Council on an agreed policy position and to ensure that a consistent approach is achieved. See also overall response on this Chapter.</p> <p>Additionally:</p> <p><i>Para’ 12.8.6:</i> Reference to the Midlands Connect identified A46-M1 link is out of date and neither does it necessarily reflect current thinking about the need to improve strategic orbital connectivity to the south and east of the City of Leicester.</p> <p><i>Policy wording:</i> The wording does not reflect the published proposed Main Modifications to the equivalent Harborough Local Plan policy (SA02).</p> <p>There is concern that inconsistent references to the need for improved strategic orbital connective and in policy wording could undermine the effective delivery of both the Oadby and Wigston and the Harborough Local Plans from a transport perspective. The County Council would welcome the opportunity to discuss and agree with the Borough Council and Harborough District Council proposed Main Modifications to the Plan to ensure consistency.</p> <p>There is also a concern that in combination with proposed allocation site AP5, this site will lead to a significant proliferation of new points of access on to Gartree Road, a route that is likely to be key to providing multimodal transport connectivity to sites AP4 and AP5. In order to minimise access points; ensure that residents of site AP5 have as direct as possible walking, cycling and wheeling access to services and facilities (amenities) proposed to be provided on site AP4; and to maximise opportunities for the joint serving of the sites by passenger transport, Main Modifications are necessary to this policy to require sites AP4 and AP5 to be comprehensively master-planned to take account of one another.</p>

Allocation Policy 5 (AP5): Land East of Stoughton Road, Oadby (Strategic)	<p>See overall response on this Chapter and also the response to Policy AP4 in respect of master-planning. That is Main Modifications are necessary to this policy to require sites AP5 and AP4 to be comprehensively master-planned to take account of one another.</p> <p>Additionally, for Policy text 2.i) Wording should be amended to “Provision of 1 Ha of land and or a financial contribution towards a new and / or existing early years and primary school (as identified by Leicestershire County Council) increasing capacity at an appropriate location (namely Brookside Primary School), to ensure that the new development does not have a negative impact on the local community accessing early years and primary education in the Borough.”</p>
Allocation Policy 6 (AP6): Land South of Sutton Close, Oadby (Strategic)	See overall response on this Chapter.
13: Monitoring and Implementation	
Monitoring Policy (MP1): Monitoring and Implementation (Strategic)	Monitoring framework table: Consider the inclusion of a target that relates to climate change adaptation against Spatial Objective 10: Climate Change.

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