

Appendix

Leicestershire County Council Officer Comments on Oadby & Wigston Borough Council's New Local Plan Issues and Options Consultation (October 2021)

	Questions	Comments
1.	Overarching/general comments not related to any of the specific sections/questions set out below	<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 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&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,</p>

	Questions	Comments
		<p>'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-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 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 Transport Decarbonisation Plan 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 & Wigston have yet to have any</p>

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		<p>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. https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2019/10/3/SUB8-Oadby-Safeguarding-2015.pdf</p>
<p>Part 01. New Local Plan Issues & Options - Introduction and Next Steps</p>		
2.	Any general comments?	<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>
<p>Part 02. New Local Plan Issues & Options - Overarching Policy Areas</p>		
<p><i>Plan Period and Cooperation</i></p>		
3.	Is the suggested Local Plan time period of 'date of adoption to the year 2041' appropriate?	<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>

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4.	Who should be the key stakeholders that the Council enters into Statements of Common Ground with?	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.
Where should development go?		
5.	Which of the proposed options illustrated should be used in determining the location of new development within the Borough area?	<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 <u>LTN1/20*</u> and as appropriate viable, sustainable (in financial terms going forward) passenger transport services that reflect the ambitions of the National Bus Strategy '<u>Bus Back Better</u>'. (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 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</p>

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		<p>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 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 https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2019/10/3/SUB8-Oadby-Safeguarding-2015.pdf 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>
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?	<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 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</p>

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		<p>more of their neighbours and communities, strengthening community cohesion and social connectivity. See here for more details: https://www.tcpa.org.uk/the-20-minute-neighbourhood.</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>

Part 03. New Local Plan Issues & Options - Strategic Housing

Housing Need

7.	<p>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?</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 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><u><i>Comments from the County Council as a landowner</i></u></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>
8.	<p>Should the Council use the housing need figure of 180 new homes per year calculated by the Standard Method?</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</p>

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		<p>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><i><u>Comments from the County Council as a landowner</u></i></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>
9.	<p>What should the Council do if the HENA outcomes suggests that there should be a diversion from the Standard Method?</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 future spatial distribution of new housing set out in the Strategic Growth Plan.</p> <p><i><u>Comments from the County Council as a landowner</u></i></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>
10.	<p>What do you consider is the evidenced housing need for the Borough area?</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</p>

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		<p>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><u>Comments from the County Council as a landowner</u></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>
11.	Should the Borough area be taking any of Leicester City's declared unmet housing need?	<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 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><u>Comments from the County Council as a landowner</u></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>
Housing Density		
12.	Should the Council 'roll forward' the current Local Plan policy relating to housing density	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.

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	ensuring that it is up-to-date with national policy and guidance?	<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 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.</p> <p>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><u>Comments from the County Council as a landowner</u></p> <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>
13.	Should the Council be seeking to increase the minimum density targets in the new Local Plan?	<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</p>

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		<p>for larger properties that have a dedicated 'office' and greater garden space, which will also impact on density levels.</p> <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><u><i>Comments from the County Council as a landowner</i></u></p> <p>As per response to question 12.</p>
14.	Should the Council be seeking to decrease the minimum density targets in the new Local Plan?	<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><u><i>Comments from the County Council as a landowner</i></u></p> <p>As per response to question 12.</p>
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?	<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>

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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><u><i>Comments from the County Council as a landowner</i></u></p> <p>As per response to question 12.</p>
16.	Should the Council be applying maximum density targets?	<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 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><u><i>Comments from the County Council as a landowner</i></u></p> <p>As per response to question 12.</p>
Affordable Housing		
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?	<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><u><i>Comments from the County Council as a landowner</i></u></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</p>

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		delivered should be subject to the viability of the site not being negatively impacted to the extent that the site becomes undeliverable.
18.	Should the Council be applying a single Borough wide percentage target and policy approach?	<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><u>Comments from the County Council as a landowner</u></p> <p>As per the response to question 17.</p>
19.	Should the Council be seeking to increase the minimum affordable housing percentage targets in the new Local Plan?	<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><u>Comments from the County Council as a landowner</u></p> <p>As per the response to question 17.</p>
20.	Should the Council be seeking to decrease the minimum affordable housing percentage targets in the new Local Plan?	<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><u>Comments from the County Council as a landowner</u></p> <p>As per the response to question 17.</p>
21.	Is the Council correct in amending the qualifying threshold to reflect the current definition of 'major development' as set out in the NPPF?	<p>The difference seems negligible but yes, it makes sense to align this.</p> <p><u>Comments from the County Council as a landowner</u></p> <p>As per the response to question 17.</p>
22.	What do you consider to be the most appropriate affordable housing target(s) for the Borough	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?

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	area?	<p><i>Comments from the County Council as a landowner</i></p> <p>As per the response to question 17.</p>
<i>Gypsy and Traveller Need</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?	<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>
24.	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?	<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>
<i>Older Persons Housing</i>		
25.	Should the Council require applicants to provide older persons housing and / or accommodation, on all development sites regardless of size?	<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 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</p>

	Questions	Comments
		<p>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><u>Comments from the County Council as a landowner</u></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>
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 development?	<p>As per the response to question 25.</p> <p><u>Comments from the County Council as a landowner</u></p> <p>As per the response to question 25.</p>
27.	Which option from the above set of potential options would be the most appropriate for the Borough area?	<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 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 stay 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&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</p>

	Questions	Comments
		<p>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&W by 2037. Extra Care Housing and Supported Living would benefit from being located within close walking distance of the facilities referred to in <i>Section 7. Potential Community, Retail and/or Health Use.</i></p> <p><u><i>Comments from the County Council as a landowner</i></u></p> <p>As per the response to question 25.</p>
28.	Should the Council be considering the housing needs for younger persons as well as the housing needs for older persons?	<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 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&WDC on the volume and location of such developments.</p> <p><u><i>Comments from the County Council as a landowner</i></u></p> <p>As per the response to question 25.</p>
Part 04. New Local Plan Issues & Options - Employment		
Employment Need		
29.	Should the Council use the outputs of the HENA to specify the employment need of the	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.

	Questions	Comments
	Borough area or produce an up-to-date Employment Land and Premises Study?	<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 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><u>Comments from the County Council as a landowner</u></p> <p>It would seem to be a sensible approach to base employment land needs on the most up to date evidence available.</p>
30.	Is there any other method for calculating the Borough's employment need?	<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 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><u>Comments from the County Council as a landowner</u></p> <p>As per response to question 29.</p>
31.	Where should additional	In general terms, where the impacts on the area's highways and transport system can best be limited. This is both in respect of

	Questions	Comments
	<p>employment land development be located if a need arises?</p>	<p>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 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><u>Comments from the County Council as a landowner</u></p> <p>As per response to question 29.</p>
<p><i>Identified Employment Areas (new and existing)</i></p>		
<p>32.</p>	<p>Which of the above potential options would be the most appropriate approach for managing the supply of employment land within the Borough area?</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, 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><u>Comments from the County Council as a landowner</u></p>

	Questions	Comments
		<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 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.</p>
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?	As per response to question 32.
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 protects employment land for B Class employment businesses to locate, evolve and grow?	As per response to question 32.
Part 05. New Local Plan Issues & Options - Economy		
Retail Hierarchy		
35.	Do you consider that the existing	The existing list of centres is fine, but with the amount of new house building that has happened since the local plan was

	Questions	Comments
	list of centres, set out within the current Local Plan, is up-to date and relevant?	produced, coupled with the move to on-line shopping and the closure of many bank/building society branches in local 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.
36.	Do you consider that the existing list of centres needs amending to reflect changes that have occurred within the Borough area?	As per response to question 35.
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?	No comment.
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?	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 just in terms of retail but in particular leisure/ restaurants to develop a night-time economy. The offer is currently dominated by takeaways.
Retail Need		
39.	Which of the above potential options do you consider is / are the most appropriate for the	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

	Questions	Comments
	Borough area?	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.
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?	As per response to question 39.
41.	Should the Council be concentrating retail development within just one of the three main centres, rather than spread across all three?	<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>
42.	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?	<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 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,</p>

	Questions	Comments
		financial services (i.e. post office or bank), 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.
<i>Town and District centres and their boundaries</i>		
43.	Should the Council continue with the current tightly drawn boundaries of its town and district centres?	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.
44.	If the answer is no to the answer above, how do you consider that the Council should approach town and district centre boundaries?	Not applicable.
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?	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.
<i>Local Centres</i>		
46.	Should the Council continue to define local centres and protect them (and enhance where possible) from inappropriate development?	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

	Questions	Comments
		<p>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> <p>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.</p>
47.	Should the Council remove the designation and not have policy considerations relating to local centres?	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.
48.	Are there any currently designated Local centres that should be removed?	As per response to question 47.
49.	Are there any areas within the Borough area that you consider should be designated as Local centres?	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.
<u>Part 06. New Local Plan Issues & Options - Green Infrastructure</u>		
<i>Green Infrastructure</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	<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</p>

	Questions	Comments
	<p>amendments to ensure that it is up-to-date with current national planning policy and guidance?</p>	<p>approach, subject to the new Plan ensuring that:</p> <ul style="list-style-type: none"> - provision for essential transport infrastructure will still be an acceptable land use in a green wedge - 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. <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 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>
Green Wedges		
51.	<p>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?</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>As per the Local Highway Authority response to question 50.</p>
52.	<p>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</p>	<p>As per response to question 51.</p>

	Questions	Comments
	factual updates?	
Countryside		
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?	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.
54.	Are any of the other options set out above appropriate?	As per response to question 53.
55.	What forms of development do you consider should be allowed in countryside locations of the Borough?	<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>
Sustainable drainage and surface water		
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?	<p>Yes, with minor modifications to text (see bold italicised text):</p> <p><i>"The Council will require all proposals, including refurbishments (11 or more residential units or 1,000+ square metres of floor area) to incorporate appropriate Sustainable Drainage Systems 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 "incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate". 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</p>

	Questions	Comments
		<p>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 known to be 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>
Flood Risk		
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?	Yes.
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?	No. The policy goes slightly further than NPPF and as such the Lead Local Flood Authority would welcome the retention of this condition.
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?	The current SFRA is dated 2014 and serious consideration should be given to updating this. Since 2014 a number have changes have been made to national policy and guidance surrounding surface water management and flood risk.

	Questions	Comments
<p>Part 07. New Local Plan Issues & Options - Environment and Sustainability</p>		
<p>Habitats and Biodiversity</p>		
<p>60.</p>	<p>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?</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 ad 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 & 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 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 (bold), but it may be better to start again.</p> <p><i>Policy 37 Biodiversity and Geodiversity.</i> <i>The Council will look to support require development to demonstrate measurable biodiversity net gain in accordance with NPPF policy and national legislation, and:</i></p> <ul style="list-style-type: none"> - <i>Conserve, protect and enhance biodiversity and geodiversity through minimising loss of valued features and priority UK and local BAP habitat in the landscape, such as species-rich grassland, hedgerows, woodland, trees, ponds and wetland, and sites that meet the local criteria for designation as a Local Wildlife Site.</i> - <i>Conserve and protect irreplaceable woodland woodland habitats, such as ancient woodland or veteran trees.</i> <p><i>– 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 designated sites, and only resort to compensation for habitat loss when no other options are available</i></p>

	Questions	Comments
		<p>Mitigate-Compensate 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, in accordance with legislation and local biodiversity net-gain policy, 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, 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. 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</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, so that biodiversity net-gain arising from development will contribute towards local regional and national Local Nature Recovery, in accordance with the appropriate objectives of Local Nature Recovery Strategies habitats and species can thrive and help to create rich biodiversity within the Borough for future generations to enjoy.</p> <p>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.</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>
61.	In what ways do you consider that the Council could ensure genuine and demonstrable biodiversity net gains on all new development sites?	<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 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</p>

	Questions	Comments
		<p>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>
62.	<p>Should the Council be making use of Natural England’s Biodiversity Metric, or are there more appropriate ways of calculating biodiversity net gain?</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, 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>
Climate Change		
63.	<p>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?</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 <u>Transport Decarbonisation Plan</u> 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 & wellbeing outcomes for residents.</p>

	Questions	Comments
		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).
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?	No comment.
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?	<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>

Part 08. New Local Plan Issues & Options - Infrastructure

Highways Capacity

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?	<p>The Leicester and Leicestershire Strategic Growth Plan (SGP) sets out that in order for the Housing Market Area (HMA) to 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 <i>national</i> 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</p>
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	Questions	Comments
		<p>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 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>
Highways infrastructure need		
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?	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 Local Highway Authority has consider the outcomes of this work, it will be able to express a view.
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?	<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>

	Questions	Comments
69.	Should the Council require all development to provide contributions to support the delivery of local / strategic highway infrastructure solutions?	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.
70.	Should the Council encourage applicants to provide contributions to support the delivery of local / strategic highway infrastructure solutions?	As per response to question 69.
Sustainable Transport		
71.	What transport and infrastructure solutions do you consider are required so that growth can come forward in the future?	<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>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>
72.	Which option from the above set of potential options would be the most appropriate for the Borough area?	See responses to questions 73 and 74.
73.	Should the Council continue with existing policy approach (or similar) in the current Local Plan?	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.

	Questions	Comments
		<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 <u>Cycling and Walking Strategy</u> and soon to be published (at the time of preparing this response) Leicestershire Bus Service Improvement Plan.</p>
74.	<p>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?</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>
75.	<p>Should the Council develop a Local Policy that actively promotes and encourages sustainable transport and discourages the use of the private car?</p>	<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% (<u>Oadby & Wigston District Health Profile, 2021</u>). 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>
76.	<p>Should the Council promote improved technology and traffic</p>	<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</p>

	Questions	Comments
	management solutions to address congestion, delays and air quality issues in the Borough?	are likely to be most effective/required to support the area's future growth.
77.	Should the Council allow for development and accept that junctions and links will continue to operate above capacity?	<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 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>
78.	Which option from the above set of potential options would be the most appropriate for the Borough area?	See Local Highway Authority responses to questions 73 and 74.
79.	Should the Council continue to safeguard the Potential Transport Route (former EDDR) in Oadby? If so, please provide justification / evidence of its need.	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.

	Questions	Comments
Developer Contributions		
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?	<p>Yes (see Local Highway Authority response to question 66 and other questions that are similar in nature to this one). It is 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>
81.	Should the Council seek to develop a new Policy approach to meeting its infrastructure and developer contribution needs?	See Local Highway Authority response to question 66 and other questions that are similar in nature to this one.
82.	Should the Council only allow development where there is demonstrable capacity or certainty of delivery of infrastructure such as schools / health services etc?	<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>

	Questions	Comments
83.	<p>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?</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>
Viability		
84.	<p>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?</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>
85.	<p>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?</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>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</p>

	Questions	Comments
		<p>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>
86.	<p>Do you consider that there is a piece of infrastructure, service and / or facility that needs to be delivered regardless of the cost?</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>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>
High quality communications		
87.	<p>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?</p>	<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</p>

	Questions	Comments
		<p>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>
88.	<p>If the Council was to require all development proposals to provide the infrastructure for 5G phone service and / or high speed fibre broadband to every new home or unit, what evidence would the Council need to underpin / justify this requirement?</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>
Education		
89.	<p>Should the Council require all development proposals, regardless of size, to contribute towards delivery of educational infrastructure?</p>	<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>
90.	<p>Should the Council consider any of the other options set out above appropriate?</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>

	Questions	Comments
		<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>
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?	No. There are local issues that may require different solutions.
92.	Do you consider that there are current issues with education provision within the Borough area?	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.
<i>Walking and Cycling Infrastructure</i>		
93.	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?	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) .
94.	Should the Council draft a new Policy to address Walking and Cycling Infrastructure needs in the Borough, taking account of up	<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</p>

	Questions	Comments
	to date national planning policy and guidance, as well as local evidence?	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% (<u>Oadby & Wigston District Health Profile, 2021</u>) 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).
Public Transport		
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?	As per the response to question 93.
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?	<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 '<u>Bus back Better</u>'; <u>its Passenger Transport Policy and Strategy</u>.</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 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.</p>

	Questions	Comments
97.	Do you consider that the current public transport provision within the Borough area is adequate or does it need to be improved?	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.
Part 09. New Local Plan Issues & Options - Local Housing		
First Homes		
98.	Is there robust evidence to suggest that the level of discount should be increased within the Borough area?	First homes should be included within the overall requirement for affordable housing and delivered as part of an evidence-based housing mix.
99.	Do you consider that 'First Homes' will be of genuine benefit to the local communities within the Borough area?	As per the response to question 98.
Technical Housing Standards		
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?	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.
101.	Should the Council require that	As per the response to question 100.

	Questions	Comments
	all new homes provided within the Borough comply with the Governments Technical Housing Standards?	
<i>Self and Custom Build</i>		
102.	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?	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.
103.	Are there any other options available to the Council that would be appropriate?	As per response to question 103.
<i>Sustainable Homes</i>		
104.	Which of the above potential options do you consider to be the most appropriate?	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.
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?	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 cycle design and multiple life cycles and looks to use and reuse existing and secondary materials will increase the

	Questions	Comments
		<p>resilience in the delivery of new homes.</p> <p>The introduction of triple glazing should also be considered.</p>
<i>Housing Choices</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?	No comment.
107.	Are any of the other options set out above appropriate?	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&WDC on the volume and location of such developments.
<i>Urban Infill</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?	No comment.
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	No comment.

	Questions	Comments
	example, remove the 'in principle' support for infill development or splitting of plots.	
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?	No comment.

Part 10. New Local Plan Issues & Options - Design and Character

High Quality Design

111.	What is good design to you?	<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 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</p>
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	Questions	Comments
		<p>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>
112.	<p>Should the Council be producing a criteria based policy, and if so, what criteria / design principles should be included?</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"> • Being designed to allow householders to minimise the impact of their waste on the environment (such as through provision of home composting facilities). • 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. • 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>The Local Highway Authority would expect any policy to reflect the matters raised in its response to question 111.</p>
113.	<p>Should the Council be producing locally specific design guides or rely on the National Design Guide?</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 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>
114.	<p>How can the Council ensure that high quality design reflects the</p>	<p>No comment.</p>

	Questions	Comments
	character of an area and the needs of the local community?	
High Quality Construction and Use of Materials		
115.	Which one of the above potential options do you consider to be the most appropriate?	<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 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>
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?	<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 government's ambition.</p> <p>See also response to question 115.</p>

	Questions	Comments
Landscape Character		
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?	No comment.
118.	Are there any other options available to the Council that would be appropriate?	No comment.
Local Green Spaces		
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?	<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 https://www.brighton-hove.gov.uk/sites/default/files/2020-09/FINAL%20Food%20PAN%202020.pdf and can be seen as timely with current concerns around climate change and carbon reduction considerations.</p>

	Questions	Comments
120.	Do any of the currently designated sites need removing from the Local Green Space designation?	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.
121.	Are there any new areas that should be considered for Local Green Space designation?	No comment.
Design Codes		
122.	Which of the above potential options relating to local design codes do you consider to be the most appropriate for the Borough area?	<p>The Local Highway Authority has no particular view on the number and nature of codes.</p> <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 where relevant payment of commuted sums to the Local Highway Authority or the putting in place of alternative maintenance regimes.</p> <p>NB: 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>
123.	Which areas / parts of the Borough do you consider would benefit from the production of	As per the response to question 122.

	Questions	Comments
	local design codes?	
Renewable and Low Carbon Energy Production		
124.	Which of the above potential options do you consider to be the most appropriate?	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.
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?	As per the response to question 124.
Public Realm		
126.	Which of the above potential options do you consider is the most appropriate?	<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>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.</p>
127.	What do you consider to be the most important aspects of public realm?	<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</p>

	Questions	Comments
		<p>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>
Shop Fronts (including shutters)		
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?	<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>
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?	No.
<u>Part 11. New Local Plan Issues & Options - Economy Retail and Leisure</u>		
<i>Cafés, restaurants etc (night time economy and dwell time)</i>		
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?	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.

	Questions	Comments
		<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>
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?	<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>
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 well-being?	<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: <i>“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</i></p>

	Questions	Comments
		<p><i>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.”</i></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>
<i>Delivering Retail</i>		
133.	Should the Council be commissioning an up-to-date retail capacity study for each of its main centres?	Yes.
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?	Yes.
135.	Is there any flexibility that could be woven into planning policy to reflect the potential economic	Yes, although it is not easy to see how this could be achieved.

	Questions	Comments
	uncertainty ahead?	
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?	Yes, however there should still be a limit.
Local Impact Thresholds		
137.	Should the Council be maintaining a locally set Local Impact Threshold for each of its main centres?	Yes.
138.	Is an update of the retail capacity study required to ensure the impact thresholds are still appropriate?	Yes.
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?	Yes. 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.
Primary and Secondary Frontages		
140.	Are Policies 27 'Primary Shopping Frontages' and Policy 28	Yes. The shrinkage of the secondary areas may be a method for concentrating the Town Centres and encouraging dwellings in preferred areas.

	Questions	Comments
	'Secondary Shopping Frontages' still fit for purpose and do they conform to national planning policy and guidance?	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.
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?	Yes. This approach could result in a free-for-all.
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?	Yes. A Local policy approach should be maintained.
143.	Should the Council be removing the policy approaches relating to the high levels of provision of retail uses within town centres?	No. The policy should not be removed, instead it should be adjusted.
Tourism		

	Questions	Comments
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?	<p>Yes.</p> <p>Although Oadby & 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>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>
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?	No, this would not be adequate.

[Part 12. New Local Plan Issues & Options - Health and Wellbeing](#)

Open space, sport and recreation facilities

	Questions	Comments
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?	<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 should be designed to encourage and accommodate use/users across the life-course and those facing inequality around access and use– providing high quality multi-functional spaces.</p>
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?	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.
<i>Built leisure facilities</i>		
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?	<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 development? Are health needs aligned with planning for built leisure facilities?</p>
149.	Should the Council only apply the	No comment.

	Questions	Comments
	Policy principles and guidance set at a national level through the National Planning Policy Framework and the National Planning Practice Guidance?	
150.	Do you consider that the Borough area is deficient in a certain type of built leisure facility?	No comment.
151.	Do you consider that the Borough area has a surplus in a certain type of built leisure facility?	No comment.
Built health facilities		
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?	<p>The commitment of <i>'The Council is committed to maintaining and enhancing the health and wellbeing of its residents'</i> is 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 & 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>
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	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 & 158).

	Questions	Comments
	guidance, as well as local evidence?	
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?	No comment.
155.	Do consider that the Borough area is deficient in built health facilities?	No comment.
156.	Do you consider that the Borough area has about the right amount of built health facilities?	No comment.
Health Impact Assessments		
157.	Should the Council 'roll forward' the current Local Plan policy relating to Health Impact Assessments (Policy 5) with wording amendments where necessary?	<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 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 www.healthyplacemaking.co.uk).</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</p>

	Questions	Comments
		<p>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 ortal identified above. We have one developer currently piloting this process and providing feedback.</p>
158.	<p>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?</p>	<p>No.</p> <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; fingertips link</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>
<p>Part 13. New Local Plan Issues & Options - Local Services</p>		
<p><i>Car parking / electric vehicle car parking</i></p>		
159.	<p>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?</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>
160.	<p>Should the Council be requiring all new development to provide Electric Vehicle Charge points, so</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>

	Questions	Comments
	that occupiers have the ability to utilise modern technologies?	
161.	Should the Council be requiring provision of Electric Vehicle Charge points in all new homes that are delivered?	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 charging points should be a standard feature of all new developments (with any exceptions being very rare).
162.	Should the Council be requiring provision of enabling infrastructure for Electric Vehicle Charge points in all new homes that are delivered?	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.
163.	Are any of the other options set out above appropriate?	No comment. See response to questions 159 to 162.
Community Facilities		
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?	<p>It is agreed that the loss of community facilities can have a substantial impact on people's quality of life, health and 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>

	Questions	Comments
165.	Should the Council require all development proposals, regardless of size, to contribute towards delivery of community facilities?	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.
166.	Are any of the other options set out above appropriate?	No comment. See response to questions 164 & 165.
167.	Which community facility is needed in your area to mitigate the impact of growth?	<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>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>
<i>Cemetery and Burial Space</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?	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.
169.	Should the Council remove the	As per response to question 168.

	Questions	Comments
	current Local Plan policy relating to the Oadby Cemetery Allocation?	
170.	Do you consider that the Council should be allocating land for cemetery and / or burial space in the new Local Plan?	No comment.
<u>Part 14. New Local Plan Issues & Options - Heritage</u>		
<i>Conservation Areas</i>		
171.	Should the Council continue to protect conservation areas from unacceptable development, by maintaining local planning policy in the new Local Plan?	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.
172.	Are there any areas of the Borough that are not currently designated as conservation areas, however you believe they should be?	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.
173.	Are there any areas of the currently designated conservations areas that should be removed from the designation?	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.

	Questions	Comments
Listed and locally listed buildings		
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?	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.
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?	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 & Local Government (now Department for Levelling Up, Housing and Communities).
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?	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 & Rutland Historic Environment Record, as a source of complementary heritage data, and primary listing of the Borough's archaeological heritage assets (both designated and non-designated).
Part 15. New Local Plan Issues & Options - Masterplanning		
Large scale change and place making		
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	<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>

	Questions	Comments
	development?	<p>In general terms, the Local Highway Authority supports the concept of master planning; done well, it should enable 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>
178.	What do you consider to be the key principles of place making?	<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>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.</p>

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179.	Any general comments?	No comment.
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