

Appendix: Leicestershire County Council Proposed Response to the Oadby and Wigston Local Plan (2020-2041) Regulation 19 Pre-Submission Consultation Draft

January 2025

<p>Overarching comments</p>	<p>From reviewing the Regulation 19 draft plan, there are various points where the comments made previously on the Regulation 18 version have either been ignored, or the fundamental point that the comment was referring to has been removed entirely. For example;</p> <ul style="list-style-type: none"> • The Regulation 19 draft still fails to capture the crucial ‘gateway’ role that the Plan has to play in pivoting the HMA to the Strategic Growth Plan’s (SGP) spatial vision, especially in respect of: <ul style="list-style-type: none"> ○ cross-boundary site assessment and delivery (including in respect of optimising transport connectivity by active and sustainable means) ○ any safeguarding of land to required provide for transport connectivity (including through proposed allocation site) ○ how the role of the borough’s ‘town centres’ might have to adapt/evolve/flex/grow to provide for the future needs of residents of strategic growth areas in adjoining districts <p>The Local Transport Authority (LTA) recognises the importance of a Plan-led approach, as it represents the best opportunity to seek to meet the needs of Leicester and Leicestershire’s growing and changing population in a managed way. It therefore continues to commit significant resources to support district councils in the successful development and adoption of Local Plans, including to seek to ensure that sustainable growth is delivered in reality and that there is a robust policy basis for the LTA to seek developer contributions and Government funding towards transport interventions required to enable growth.</p> <p>Concluding comments:</p> <p>Given the significant factors that affect the Plan from a transport perspective, the LTA considers that the Plan in its current form fails to meet the NPPF tests of soundness insofar of its:</p> <ul style="list-style-type: none"> - Effectiveness – it fails to provide a coherent policy basis to ensure that transport interventions necessary to enable the Plan’s site allocations are deliverable over its time period and it also fails to deal with cross-boundary strategic transport matters, rather they seemingly have been deferred to the development management process. - Consistency with national policy – it provides no coherent policy basis for enabling the delivery of
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	<p>transport interventions to achieve sustainable development in reality.</p> <p>In the absence of an up-to-date local plan, the risk of speculative development coming forward is minimal within the boundaries of the district, as there are no real alternatives to the locations of the proposed allocation sites. Further, the Plan's current weak and incoherent policy framework provides no benefits for the LTA in terms of the development management process and thus conversely its absence would be of no real disbenefit.</p> <p>From a public health perspective, a HIA webpage has now been set up that can be referenced in the plan, following discussions with the Borough Council - https://resources.leicestershire.gov.uk/health-and-wellbeing</p>
Chapter 1: Introduction	<p>As per comments made at Regulation 18, the document seldom mentions Neighbourhood Plans, and when it is, this has only been done when referring to national text. Whilst it is recognised that there are currently no Neighbourhood Plan groups within the Borough of Oadby & Wigston, it would be a positive addition to include references to encouraging and supporting future Neighbourhood Planning Forums being developed in area, especially in the absence of Town and Parish Councils. This will support empowering residences and maintaining individual community identities within future development.</p>
Chapter 2: Spatial Portrait	<p>No comments.</p>
Chapter 3: Vision and Spatial Objectives	<p>We very much welcome Spatial Objective 11 which includes '<i>All development will be required to comply or justify adherence to the Council's Design Code principles and objectives to respect local history, character, and vernacular, whilst incorporating measures to conserve energy, minimise flood risk, achieve sustainable energy generation, encourage active travel, safeguard minerals, and minimise and reuse waste.</i>'</p>
Chapter 4: Spatial Strategy	<p>Emerging evidence from that wider study work is showing that growth in the district combined with proposed growth elsewhere across the south of Leicestershire, most notably in Harborough district, will have a significant impact on the district's road network, especially the A6 corridor. This includes cumulative and cross-boundary impacts, including on routes within the district of Harborough and the City of Leicester. The published Plan fails to acknowledge such impacts; indeed, is it materially inaccurate in saying at paragraph 4.2.23: (NB: LTA highlighting.) "The South Leicestershire Transport Study and wider Leicester and Leicestershire Strategic Transport Study recognise that although there will be increased traffic levels on the surrounding roads and junctions of each allocated growth area, the impact on the highway network will not be significant. However, certain levels of mitigation will be</p>

needed.” Aside from its inaccuracy, this statement is also unhelpful. If it remains unaltered, it risks undermining from the outset LTA discussions with developers about contributions towards measures required to address cumulative impacts, and thus in turn has the potential to undermine the Plan’s effective delivery from a transport perspective. Position regarding the Plan’s underlying transport strategy: Given that the Plan presently fails to accurately acknowledge the impacts of growth on the district’s road network, it is thus unsurprising that it fails to provide a coherent policy approach that seeks to address the issue of transport impacts.

This is frustrating and disappointing given that this Plan should have built on and reflected the work done to date by the LTA to underpin the delivery of the current Plan. That is through:

- a piece of work called the South East Leicestershire Transport Study (SELTS) (which will ultimately be subsumed into a South East Leicester Multi-Modal Area Investment Plan (SEL MMAIP); and
- latterly the adoption of the South of Leicester Local Cycling and Walking Infrastructure Plan (LCWIP).

Furthermore, policies that reference (non-specifically to transport or otherwise) cumulative and cross-boundary impacts and/or developer contributions are presently weakly worded, lack clarity and use varying language/terminology. Experiences with the Charnwood Local Plan have demonstrated the legality issues involved with seeking to collect Section 106 contributions towards transport measures required to deal with cumulative impacts, even where there are clearly worded Plan policies.

Thus, at present the Plan lacks any coherent approach to seeking to secure developer contributions towards the delivery of transport measures necessary to address cumulative and/or cross-boundary impacts; this poses a significant risk to its effective delivery.

It also does not comply with the County Council’s fifth engagement principle, i.e. where evidence demonstrates significant cumulative impacts arising from planned growth, the appropriate delivery mechanism for infrastructure which is critical to the successful delivery of the Plan growth is a Community Infrastructure Levy (CIL), which should be developed concurrently with a Local Plan if it is to receive the support of the County Council.

Delivery of sustainable development in accordance with the National Planning Policy Framework (NPPF): From a transport perspective, sites within the district might, in general terms, be viewed as being in sustainable locations due to their (relatively) close proximity to ranges of services. Nevertheless, a strategy and an effective delivery/funding approach is still necessary to achieve the delivery of the active and sustainable transport interventions necessary to provide sufficiently attractive

alternative means of travel (to the car) to where people want to get to.

However, the Plan at present lacks this; site allocation policies are, in the main, generic, and repetitious of each other in their requirements for transport (i.e. they are not bespoke) and, as noted in the preceding sub-section are not set in any overall policy framework for addressing the Plan's transport impacts.

Additionally, there are clusters of sites adjacent to/at Wigston (sites AP1, 3 and 8 which together total 1750 dwellings) and adjacent to/at Oadby (sites AP5, 6 and 7 which together total 1570 dwellings); these require planning in a coordinated way to seek to ensure that, inter-alia, comprehensive approaches can be developed to the delivery of optimal measures to encourage and enable active and sustainable travel (further to the point made in paragraph 16 about the provision of measures to make a site actually sustainable in reality.)

And yet, the Plan as drafted provides no effective policy framework for the coordinated development and delivery of these sites clusters. Thus, there appears to be a significant risk that uncoordinated, piecemeal development of these site clusters will likewise deliver piecemeal, uncoordinated active and sustainable transport measures that are not sufficiently attractive to encourage and enable modal shift away from the car in reality. It is questionable therefore the extent to which the Plan as it currently stands is consistent with the NPPF in terms of the delivery of sustainable development.

It also does not comply with the sixth, seventh and eighth of the County Council's engagement principles, i.e. in that active and sustainable travel provision has not been fully and properly considered through the Plan and its development, bringing significant risk that the car will be the mode of travel choice for access to key services and facilities.

Further, site AP5 (850 dwellings) is part of a cross-boundary site with land in adjoining Harborough district, which in total has the potential to deliver 4000 dwellings. These sites fall within the Leicester and Leicestershire Strategic Growth Plan 'Priority Growth Corridor' – PGC). Thus, how this site is brought forward and delivered could have significant implications for enabling or frustrating further, future growth in the PGC; site AP5 should be regarded as a 'gateway' to growth in the PGC.

Once again, the Plan as drafted is lacking, because it fails to provide any real recognition of the 'gateway' role that it needs to serve in terms of enabling further, future growth in the PGC. Whilst this issue might fall without the Local Plan tests of soundness (e.g. because the Strategic Growth Plan is a non-statutory document), it should be a concern to partners across the wider Leicester and Leicestershire Housing Market Area if sites in the district of Oadby and Wigston are delivered in such

a way that it comprises or frustrates delivery of further future growth in the PGC from a transport perspective.

Additionally, Policy 17 and Policy 18 also cover developer contributions, but use different languages in comparison to each other and Policy 3 (and differing uses of terminology across the Plan was flagged in our Regulation 18 response).

By and large the Site Allocation Policies (AP1 to AP8) contain a lot of generic, cut and paste 'clauses'/requirements, which mean that they are not necessarily reflective of the likely transport requirements for the sites in practice.

Paragraph 4.6.5 reads as follows: *"The Council's Infrastructure Delivery Plan (IDP) contains a 'live' infrastructure project list. The document identifies all local and strategic infrastructure deemed necessary to support sustainable delivery of growth in and adjacent to the Borough over the Plan period to 2041. Ongoing joint working with neighbouring local authorities and other key agencies such as utility companies or service delivery partners will continue to be a key element to identify and to successfully deliver necessary infrastructure over the Plan-period.* In relation to the above existing text and reference to joint working with neighbouring local authorities to successfully deliver infrastructure, the LCC waste service, as Waste Disposal Authority, puts forward the below statement:

LCC does not currently have plans to build further waste infrastructure in the county. It is not possible to know the future impact of planned development on capacity at the Recycling & Household Waste sites and considerations of future changes in usage would always need to be taken into account. As such, at an appropriate time in the future there would be a need for LCC and O&WBC to work effectively together to manage the future need for additional waste infrastructure, bearing in mind also emerging planned development in adjoining authority areas, in particular Harborough District and Blaby District.

From LCC as a landowner perspective:

It is noted that the total housing commitments and allocations meeting the assessed housing need are based on the old NPPF standard method (inclusive of any unmet need from Leicester City allocated under the Statement of Common Ground), Further, the calculation of the required allocations provides flexibility in that it allows for a proportion of commitments not being brought forward and adds a 15% allowance for delays in the delivery of new allocations. In addition, the actual number of homes allocated exceeds the number required giving further comfort that the appropriate housing numbers will be delivered.

	<p>However, allocated site AP5 at 850 dwellings equates to 24% of the overall allocation figure and being part of a larger 4000 home cross boundary SDA represents a risk given the potential for delays in delivering strategic developments.</p> <p>In addition it is noted that although it is quite acceptable for the plan to proceed under the old NPPF guidance the level of housing proposed only represents 63% of the need calculated using the new standard method and accordingly it will be necessary for the LPA to review the local plan at an early date at which point, given the very limited number of development opportunities that exist in the borough it is likely that there would be an unmet need to be distributed across the wider HMA.</p>
Chapter 5: Combating Climate Change	<p><u>Policy 5 Climate Change</u></p> <ul style="list-style-type: none"> • Remove 'negative' from 'negative climate change' (also in Policy 8) • Part (1) – look to establish targets/baselines and forms of measurement. E.g. in 1a, state a baseline against which energy consumption in construction and operation of buildings should be reduced. • Part (1)f and g – suggest renaming the sub-section as carbon storage is not mentioned in the text itself. <p><u>Policy 6 Flood Risk and Sustainable Water Management</u></p> <ul style="list-style-type: none"> • Part (5) – suggest that this needs to make mention of climate change. The FRA should be required to make an allowance for floods exacerbated by climate change (e.g. +20%) <p>Paragraph 6 relates to pollution to the water environment rather than flood risk – recommend moving this to the section on 'water management' which currently starts with Paragraph 10.</p> <p>Paragraph 10(e) states "<i>Finished floor levels should be above the 1% AEP plus climate change peak flood level</i>". This requirement does not include a <u>minimum</u> 300mm freeboard and is therefore weaker than that advised within flood risk assessment guidance published by the Environment Agency (May 2024) which states: Finished floor levels should be a minimum of whichever is higher of 600mm above the...estimated river...level for the site. Where there is a high level of certainty about your estimated flood level, you may be able to reduce this to 300mm. It is recommended that Paragraph 10(e) is strengthened to be consistent with the Environment Agency's guidance. Source of guidance information - https://www.gov.uk/guidance/flood-risk-assessment-flood-zones-1-2-3-and-3b#contents</p> <p>Suggested text:</p>

e) Finished floor levels should be a minimum of 300mm above the 1% AEP plus climate change peak flood level.

Paragraph 13 is welcomed. Where a non-major development is shown to be at risk of surface water as shown on the flood map for planning, please consider consulting the LLFA for assurance that the flood risk is appropriately managed and mitigated.

General comment on surface water runoff rates

There is no paragraph which directly addresses runoff rates which is ultimately the most fundamental aspect to ensuring no increase in flood risk elsewhere. Runoff rates for all development (including brownfield developments) must be limited the equivalent greenfield rates (unless demonstrated to be unfeasible – brownfield only).

Harborough District Council's draft Local Plan includes a statement in their Policy DM08 for developments to "*achieve a 20% reduction in run-off rates compared to pre-development conditions to account for existing surface water runoff problems where viable*".

This statement goes some way to strengthening Paragraph 178 of the National Planning Policy Framework (NPPF) which requires development to "*where possible...reduce flood risk overall*".

Given the cross-boundary nature of Allocation Policies AP5 (Land South of Gartree Road Strategic Development Area); AP6 (Land South of Gartree Road and East of Stoughton Road, Oadby); and AP7 (Land at Oadby Grange) and the current risk of flooding to downstream communities along the Wash Brook and River Soar, betterment on the existing runoff rates is urgently required. Please consider replicating the Harborough District Council requirement for a 20% betterment on existing runoff rates (including greenfield sites).

Policy 8 Renewable and Low Carbon Energy

- Suggest removal of low carbon energy generation from the 10% requirement since a heat pump would surpass this and prevent installation of solar PV.
- Suggest clarification of the words 'into its building fabric'. Does this mean that the renewable energy technology needs to be part of the fabric (e.g. integrated solar PV) or can it be bolted onto the building?

Suggest the following change, **highlighted below**.

(Page 41) 5.4.9 The Borough Council's Climate Change Strategy (2024) establishes the Council's commitment to playing its part in tackling climate change. Key areas for climate change action that the Council is committed to include:

	<p>(Existing wording) Resources and Waste – support action to move towards a more circular economy by using our resources better, recycling, reusing and reducing waste;</p> <p>(Proposed wording) Resources and Waste – support action to move towards a more circular economy by using our resources <u>more efficiently, preventing, reducing, reusing and recycling waste;</u></p> <p>The word ‘efficiently’ is more appropriate in this context, and it is important the remaining words are put in the same order as the waste hierarchy to reflect the order of priority.</p> <p>Suggest adding in the text highlighted below to 5.2.2 (page 38)</p> <p>5.2.2 Pursuing sustainable development in the Borough involves seeking positive improvement in the quality of the built, natural, and historic environment, as well as in people’s quality of life, including (but not limited to):</p> <ul style="list-style-type: none"> • safeguarding minerals and <u>minimising and</u> reusing waste <p>Regarding paragraph 5.4.9 under “The Borough Council’s Climate Change Strategy (2024) ... is committed to include:” it is suggested to alter wording to: “Resources and Waste – support action to move towards a more circular economy by using our resources <u>more efficiently, preventing, reducing, reuse and recycling waste;</u>”. The word ‘efficiently’ is more appropriate in this context, and it is important the remaining words are put in the same order as the waste hierarchy to reflect the order of priority.</p>
Chapter 6: Housing	No comments.
Chapter 7: Commercial Development	<p><u>Policy 15 Retail</u></p> <p>How the role of the borough’s ‘town centres’ (Wigston Town Centre, Oadby District Centre, South Wigston District Centre) might have to adapt/evolve/flex/grow to provide for the future needs of residents of strategic growth areas in adjoining districts could be indicated in Policy 15. Whilst reflecting national retail policy steer the role of these centres as ‘leisure hubs’, ‘work hubs’, ‘transport hubs’ needs to be clearly articulated.</p>
Chapter 8: Transport and Community Infrastructure	<p><u>Policy 17 Sustainable Transport and Initiatives</u></p> <ul style="list-style-type: none"> • Part (3) - Suggest expanding mention of LTN 1/20 to (b) to ensure its use as the design guide for all active travel infrastructure. <p>It is considered that the section covering HIA screening stage has the potential to become a little confusing with use of both</p>

'statement' and 'tool' as concepts, and suggested amends supported by the Public Health team would be:

8.6.10 The locally-developed ~~Healthy Place Making~~ <https://www.healthyplacemaking.co.uk/> ~~Healthy Place Making~~ ~~Leicestershire, Leicester and Rutland platform by LRS Active Together and supported by Leicestershire County Council Public Health~~ <https://resources.leicestershire.gov.uk/health-and-wellbeing> has been developed to provide a resource for planners, developers and other interested parties to find information on how to create healthier places and provide guidance on health impact assessments. ~~along with the opportunity to create bespoke project boards to help influence place making.~~ This is a useful webpage which can be used to assist in the development of places that consider health and wellbeing at the forefront of design and function.

It is considered that some of the text in Policy 19 should be re-written as follows:

Policy 19:

2. *Proposals for major development, as defined within the latest National Planning Policy Framework, and or relevant national legislation, or development located in an identified area of concern in the Leicestershire Joint Strategic Needs Assessment (latest edition), or other development likely to have a potentially significant health impact in relation to either its use and/or location, will be required to complete a submit a Health Impact Assessment (HIA) screening statement, using the HIA Screening Tool as prepared by the Public Health Team at Leicestershire County Council and if identified as required by the tool, a Health Impact Assessment (HIA).*
- ~~2 The level of information required will be proportionate to the scale and nature of the development proposed. The~~
- ~~3 screening statement will measure the potential impact and demands of the development proposal upon the existing services and facilities and should demonstrate how the conclusions of the HIA screening statement have been considered in the design of the scheme.~~
3. *The level of information required in the (HIA) will be proportionate to the scale and nature of the development proposed. For developments where the initial screening assessment indicates more significant health impacts will occur, a more comprehensive, in-depth Health Impact Assessment will be required, using the template for the full HIA as prepared by the Public Health Team at Leicestershire County Council available on <https://resources.leicestershire.gov.uk/health-and-wellbeing>*

	<p>4. <i>Where significant impacts are identified, planning permission will only be granted where the Public Health Team at Leicestershire County Council and / or the Borough Council agree what measures to mitigate the impacts are provided, either on-site and / or off-site, using planning obligations.</i></p>
Chapter 9: Design and The Built Environment	<p><u>Policy 28 Sustainable Design and Construction</u></p> <ul style="list-style-type: none"> • Part (1) – Suggest putting in a stipulation that there should be no new connections made to the gas grid. • Part (2) – Suggest that this requirement is expanded a little to give more of a framework for how applicants should respond. For example, reference embodied carbon, the life cycle stages that the policy wants addressing (e.g. stages A1-A5 of EN 15978), and perhaps a methodology to use to show compliance (e.g. the RICS v2 Professional Statement on Whole Life Carbon Assessment).
Chapter 10: Natural Environment	No comments.
Chapter 11: Regeneration Areas	<p>Policy RP1: Kilby Bridge Settlement Envelope (Non-Strategic)</p> <p>WIG_009 (as indicated in the Strategic Flood Risk Assessment) is constrained from a safe access and egress perspective. The indicated point of access is via the A5199 will be required to cross Flood Zone 3. Please engage early with the Environment Agency, Lead Local Flood Authority and the Emergency Services. The site may become cut-off by flood water for prolonged periods of time without contingency measures in place for access/egress. Consider whether the proposals can incorporate any additional flood storage areas to reduce flood risk overall downstream.</p>
Chapter 12: Allocation Sites	<p>A change to the primary school provision requirement from 5FE up to 6FE. The changes should be updated as per below, highlighted. This takes into account the 4000 homes in the strategic development area as well as the 400 dwellings in the Great Glen area in Harborough (the Great Glen development will pay the pro rata amount for the extra form of entry).</p> <p><i>Meet the primary and secondary needs arising from the site. Provision of sufficient land for an 8 form entry secondary school, including post 16 provision to accommodate wider strategic growth needs and <u>6 forms of entry primary school provision, including early years provision.</u> Other developments or public funding will be required to contribute to the costs of any provision that is not required to meet the needs of the site. The Applicant should produce an Education Delivery Strategy in conjunction with the County Council to be approved by the</i></p>

Councils which considers options for meeting these requirements which will include the provision of new schools meeting DFE standards and may include the expansion of existing schools.

Regarding paragraph 12.10.6 “*Linked to the wider aspirations of the Leicester & Leicestershire Strategic Growth Plan (SGP), future consideration of the potential for the A46 – M1 southern road link identified in the Midlands Connect Strategy should be taken into account in the master planning of the site, to future proof the site and ensure that it integrates into future transport networks, should a defined route emerge over the duration of the development.*” It starts from the wrong point: Midlands Connect have long since stopped seeking to promote this as a strategic route; rather the considerations should be about avoiding land-locking development elsewhere in the SGP Priority Growth Corridor and improving multi-modal transport connectivity around the south and east of Leicester. However, this is a moot point as the sentiments of the text are not actually reflected in site allocation Policy AP5. Whilst transport evidence is not yet sufficiently mature to be definitive about what role a route across the site might need to provide, with reference to our previous Regulation 18 comments the Plan’s/Policies’ acknowledgement of the importance of this site as being a ‘gateway’ to the delivery of the SGP would at least provide ‘a peg in the sand’ to allow that evidence to be further developed.

For all Allocation Policies

Paragraph 2(b) of the policy text states “flood mitigation measures that ensure the new development has no negative impact on the existing urban environment.”.

Consider strengthening the wording to ensure development reduces flood risk downstream overall in accordance with Paragraph 178 of NPPF.

Allocation Policies AP1, AP2 and AP3

AP1: Land North of Newton Lane, Wigston

AP2: Wigston Meadows Phase 3, Wigston

AP3: Land North of Glen Gorse Golf Course, Wigston

AP8 – Land South of Sutton Close, Oadby

The existing flood risk mapping for this large area is of a strategic nature. A combined hydraulic model for the ordinary watercourses should be produced down to the River Sence confluence. This will support the design and layout of any proposals at Kilby Bridge.

Allocation Policies AP5, AP6 and AP7

AP5: Land South of Gartree Road Strategic Development Area
 AP6: Land South of Gartree Road and East of Stoughton Rd, Oadby
 AP7: Land at Oadby Grange

Likewise, the existing flood risk mapping for this large area is of a strategic nature. A combined hydraulic model for the ordinary watercourses should be produced for the upper Wash Brook catchment. The catchment splits around Stretton Hall where water is conveyed to the west towards the River Sence catchment and into the flood prone village of Great Glen (Harborough DC).

Allocation Policy AP4

Unsure of the exact location of Allocation Policy 4 (AP4) – Land West of Welford Road. The only one that I saw west of Welford Road in the Level 2 SFRA was the development at Kilby Bridge, but the description doesn't match and Kilby Bridge has its own section in Chapter 11 for regeneration.

In relation to all allocations and especially the larger sites, there is a need to think about waste facility capacity and the impact upon it and Sewage treatment works/wastewater capacity.

Comments on specific allocations:

- AP1 – Not within MSA (minerals safeguarding area). Welcome that it will be considered cumulatively.
- AP2 – Appears to be partly within (small part) MSA for sand & gravel. Welcome that it will be considered cumulatively.
- AP3 – Not within MSA. Welcome that it will be considered cumulatively.
- AP4 – Adjacent to but not within MSA for sand & gravel. Welcome that it will be considered cumulatively.
- AP5 – Not within MSA. Welcome that it will be considered cumulatively. Note the proximity to allocations in Harborough and being adjacent to safeguarded waste sites Great Glen STW (H10), and Little Stretton STW (H18) as identified in S3/2015 and figure H2 as part of the Leicestershire Minerals and Waste Local Plan. This should be taken into consideration and 'agent of change' principle applies.
- AP6 – MSA for sand & gravel within 500m to the north. Welcome that it will be considered cumulatively. Note the proximity to allocations in Harborough and being adjacent to safeguarded waste sites Great Glen STW (H10), and Little Stretton STW (H18) as identified in S3/2015 and figure H2 as part of the Leicestershire

	<p>Minerals and Waste Local Plan. This should be taken into consideration and 'agent of change' principle applies.</p> <ul style="list-style-type: none"> • AP7 – Not within MSA. Welcome that it will be considered cumulatively. • AP8 – Not within MSA. Welcome that it will be considered cumulatively. <p>All allocations are fairly close to each other within the wider area so consideration of cumulative impacts is important.</p> <p>Kilby Bridge is also within the MSAMCA (mineral consultation area) for sand & gravel. Therefore the policy for regeneration of this area is not inappropriate but needs to mention this perhaps in order to be a policy which has considered safeguarding.</p>
Chapter 13: Monitoring and Implementation	No comments.

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