

Examination of the Leicester Local Plan 2020-2036

MATTERS, ISSUES AND QUESTIONS FOR THE EXAMINATION (MIQs)

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Introduction

The purpose of this independent Examination of the Leicester Local Plan (the Plan) is to determine whether the Plan:

- has been prepared in accordance with the Duty to Co-operate and the legal and procedural requirements in the Planning and Compulsory Purchase Act 2004 (the PCPA 2004) and the Town and Country Planning (Local Plan) (England) Regulations 2012 (the 2012 Regulations); and
- is sound, as defined in paragraph 35 of the National Planning Policy Framework (the NPPF)¹.

This document contains all of the matters, issues and questions (MIQs) for the Examination, relating to the legal compliance and soundness tests. The MIQs are based on our initial reading of the Plan, the evidence base and the representations.

A Hearing has been arranged to enable discussion of the MIQs. It is scheduled to open on 1 October 2024 and is programmed to run for 14 days, over five separate weeks, until 21 November 2024. A timetable for the matters to be discussed on each day of the Hearing is set out in the Revised Outline Hearing Programme [EXAM 11].

The MIQs should also be read alongside our Examination Guidance Notes [EXAM 10], which contains information on the Hearing procedure, what you will need to do if you wish to participate and the format of any Hearing statements.

Document References in footnotes or [square brackets] are to the Evidence Base and Submission documents or the Examination documents, which can be viewed on the Examination webpage at the link below or obtained from the Programme Officer.

Examination webpage: <https://www.leicester.gov.uk/content/leicester-local-plan-examination/leicester-local-plan-2020-2036-examination-contents/>

¹ The Plan is being examined under the September 2023 version of the NPPF, which can be accessed from the following link: [\[ARCHIVED CONTENT\] National Planning Policy Framework - GOV.UK \(nationalarchives.gov.uk\)](#)

Glossary and Abbreviations

5YHLS	Five Year Housing Land Supply
AAP	Area Action Plan
AQMA	Air Quality Management Area
CDA	Central Development Area
DPD	Development Plan Document
DLUHC	Department for Levelling Up, Housing and Communities
DtC	Duty to Co-operate
EV	Electric Vehicle
GTAA	Gypsy and Traveller Accommodation Assessment
HLS	Housing Land Supply
HMA	Housing Market Area
HRA	Habitat Regulation Assessment
LDS	Local Development Scheme
the Plan	Leicester City Local Plan
LHS	Local Housing Supply
MWLP	Minerals and Waste Local Plan
MHCLG	Ministry of Housing, Communities and Local Government
NPPF	National Planning Policy Framework (September 2023)
PPG	Planning Practice Guidance
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SHELAA	Strategic Housing and Employment Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SFRA	Strategic Flood Risk Assessment
SPD	Supplementary Planning Document
SUE	Sustainable Urban Extension
SoCG	Statement of Common Ground
sSoCG	supporting Statement of Common Ground

MATTER 1 – DUTY TO CO-OPERATE AND LEGAL COMPLIANCE

Issue 1a: Duty to Co-operate

Has the Council complied with the Duty to Co-operate (DtC) in preparing the Leicester Local Plan (the Plan)?

1. Does the Plan give rise to any strategic cross-boundary issues for which there is a Duty to Cooperate (DtC)?
2. If so, has the Council engaged constructively, actively and on an ongoing basis with all of the relevant authorities and prescribed bodies on the 'strategic matters' applicable to the Plan and have they been resolved?
3. Is this adequately evidenced by the Statement of Compliance with the DtC² and any supporting Statements of Common Ground (SsoCG)? Has the Leicester & Leicestershire SoCG been signed by Hinckley and Bosworth Borough Council yet?
4. Does the evidence contained in the Statement of Compliance with the DtC and the associated SsoCG adequately demonstrate that the City Council has met the DtC in accommodating unmet needs?
5. Are there any 'strategic matters' on which the DtC has not been met? If so, what is the evidence to support this?

Issue 1b: Other Legal and Procedural Compliance

Has the Council complied in all other respects with the legal and procedural requirements in preparing the Plan, as defined in Part 2 of the Planning and Compulsory Purchase Act 2004, the Town and Country Planning (Local Plan) (England) Regulations 2012 and the Conservation of Habitats and Species Regulations 2017 (as amended)?

Local Development Scheme

6. Has the Plan been prepared in accordance with the Council's Local Development Scheme (LDS)³? Are there any obvious omissions from the submitted Plan, in terms its overall scope as described in the LDS [SD13]?

Consultation

7. Has consultation on the Plan been undertaken in accordance with the Council's adopted Statement of Community Involvement [SD11] and the minimum consultation requirements in the Regulations⁴? What evidence is there to demonstrate this and that representations submitted in response to the first Draft Plan have been taken into account as required by Regulation 18(3)?

² Core Document SD12

³ Required by section 19(1) of Part 2 of the Planning and Compulsory Purchase Act 2004

⁴ Regulations 18 and 19 of Town and Country Planning (Local Planning) (England) Regulations 2012

Sustainability Appraisal

8. Has the formulation of the Plan been based on a sound process of sustainability appraisal (SA), as set out in the Sustainability Appraisal of the Leicester Local Plan, dated September 2022. In particular:
 - a). Is the baseline evidence sufficiently up-to-date and therefore adequate?
 - b). Does the SA test the policies and site allocations in the Plan against reasonable alternatives?
 - c). Has the SA been robustly prepared with a comparative and equal assessment undertaken of each reasonable alternative?
 - d). Is the SA decision making and scoring robust, justified and transparent?
 - e). Has the Council provided clear reasons for not selecting reasonable alternatives?
 - f). Is it clear how the SA has influenced the policies and allocations in the Plan and how mitigation measures have been taken account of?
 - g). Have the requirements for Strategic Environmental Assessment been met, including in respect of the cumulative impacts of the Plan?

Equalities Impact Assessment

9. Is the Equalities Impact Assessment [SD5] adequate? Does it demonstrate whether the policies and allocations of the Plan would have any negative effects on people with protected characteristics in Leicester? Are further mitigation measures required?

Habitats Regulations Assessment

10. Is the Plan legally compliant with respect to the Habitats Regulations⁵, as interpreted by recent case law⁶, and any requirement for appropriate assessment? Does the Habitats Regulations Appropriate Assessment Screening Report (HRA), dated September 2022 ensure compliance?
11. Are any other Main Modifications to the Plan necessary to ensure it would not have any likely significant impacts in the light of the HRA?

Climate Change Policies

12. Does the Plan, taken as a whole, include policies designed to ensure that the development and use of land in Leicester contributes to the mitigation of, and adaptation to, climate change in accordance with the Act⁷?

Superseded Policies

13. Does the Plan make clear which policies of the adopted development plan it would supersede, as required by paragraph 8(5) of the Regulations? Should the Plan contain a list of current saved policies to be replaced?

⁵ Conservation of Habitats and Species Regulations 2017 (as amended)

⁶ People over Wind & Sweetman v Coillte Teoranta C-323/17

⁷ Section 19(1A) of the Planning and Compulsory Purchase Act 2004 (as amended)

MATTER 2 – VISION AND STRATEGY

Issue 2: Is the Plan’s overall vision and strategy positively prepared, justified, effective and consistent with national policy in enabling the delivery of sustainable development?

Policy VL01 – Presumption in Favour of Sustainable Development

14. Is Policy VL01 consistent with national policy in respect of the presumptions in favour of sustainable development and of the development plan in the NPPF and section 38(6) of the 2004 Act? Does it serve a clear purpose and avoid unnecessary duplication of policies as expected by paragraph 16(f) of the NPPF?

Vision and Strategy

15. Should the Vision for strong sustainable growth in Leicester set out in Chapter 3 of the Plan be balanced against the need to combat climate change and enhance the natural environment and biodiversity?
16. Are the policies in chapter 4 of the Plan, which comprise the Strategy for Leicester, positively prepared and consistent with national policy in setting out a spatial strategy for the City, including provision for infrastructure and community facilities, the conservation and enhancement of the natural environment, green infrastructure and open space, and guiding development form, and measures to address climate change mitigation and adaptation? If so, where is this strategy clearly articulated?
17. Is the Plan justified in identifying in Diagram 2 the proposed growth for ‘Leicester Urban Area’, including Strategic Growth Areas beyond the administrative boundary of the City in adjoining Districts and Boroughs?
18. One of the key strategic planning issues affecting Leicester, identified at paragraph 4.5 of the Plan, is the need to secure infrastructure investment to support the planned housing and employment growth. How and when will that investment be secured to enable the delivery of growth proposed in the Plan?

Plan Period

19. In the light of the Council’s response to the Inspectors’ initial question 5 about the Plan period, would the Plan be positively prepared, justified and consistent with national policy in running only to 2036?
20. Given the reliance on neighbouring Local Authorities to provide housing and employment land as well as infrastructure to ensure that the Leicester Local Plan is delivered, would an early review of the Plan be required to ensure that the Plan is effective?

Policy SL01 – Location of Development

21. Is the spatial strategy for the location of development contained in Policy SL01 justified and effective in respect of its reliance on the Central Development Area (CDA) for around 30% of the Plan's housing provision in Leicester City?
22. Is the evidence set out in the CDA Residential Capacity Study, 2022 [EB/CD/10] sufficiently robust and reliable to show that a further 6,286 dwellings will come forward within the CDA over the Plan period? To ensure the Plan is effective in delivering the required capacity, should sites within the CDA be allocated for minimum numbers of dwellings?
23. Does the overall distribution of housing growth across the City, as proposed in Policy SL01, maximise the opportunities to viably address the need for affordable housing?
24. Should Policy SL01 also support residential development on windfall sites given the reliance on this source of supply to meet the Plan's housing requirement?
25. The Local Housing Need Assessment 2022 identifies a need for 4,800 student bedspaces over the Plan period. Given the importance of the two universities to the City's economy, should the need for, and provision of, student accommodation be included as part of the spatial strategy in Policy SL01, to ensure the Plan is positively prepared, justified and effective?
26. Given the identified need for 46,000 sqm of office space in the City over the Plan period, does the allocation of just two sites at Campbell Street and Phoenix Square for a minimum of 40,000 sqm of office development, provide sufficient scope and flexibility to meet the future need for office space? Should other sites, which are identified in the Plan for new office development, such as Waterside (Policy ORA02), the Old Town (Policy CHA08) and New Walk (Policy CHA09), be identified in Policy SL01 to ensure the strategy for new office development is positively prepared and effective?
27. Policy SL01 only identifies the location and distribution of 29 ha of the 44 ha of land proposed for allocation to meet B2 and B8 uses. To ensure the Plan is positively prepared and effective, should the policy also specify the location and distribution of the remaining 16 ha of employment?
28. Overall, does the spatial strategy in Policy SL01 provide sufficient flexibility over the Plan period to ensure the needs of the City will be met?
29. As set out in paragraph 2.37 of the Plan, Leicester City Council is a waste and minerals planning authority. Whilst it is understood that a Minerals and Waste Local Plan will be prepared separately, how does this Plan acknowledge the minerals and waste infrastructure required to deliver the growth proposed in Policy SL01?

Policy SL01 – Housing Need and Requirement

30. In the light of the most up to date calculation of local housing need for Leicester of 39,424 dwellings at 2,494 dwellings per annum (dpa) for the period 2020-2036, is Policy SL01 of the Plan positively prepared, justified and consistent with national policy in setting a housing target of 20,730 dwellings (1,296 dpa)? If not, what should the housing requirement be both annually and for the proposed Plan period?
31. Given the imperative of national policy to significantly boost the supply of homes, in paragraph 60 of the NPPF, is Policy SL01 justified in setting the figure of 20,730 dwellings as 'a target the Council will work towards' or should this be set as a 'minimum housing requirement' for Leicester?
32. Is it justified and appropriate that the remaining unmet housing need will be distributed as agreed in the Leicester and Leicestershire Housing and Employment Need Statement of Common Ground?

Policy SL01 – Employment Need and Requirement

33. In the light of the most up to date evidence in the 2020 Economic Development Needs Assessment (EDNA) 2021 of new employment need for Leicester by 2036 of 46,000sqm for offices, 65ha of land for light/general industry and small scale storage and distribution use, and additional land for strategic distribution uses, is Policy SL01 of the Plan positively prepared, justified and consistent with national policy in setting a target of only 44ha of land for new employment uses up to 2036 within the City's boundaries?
34. Is it justified and appropriate that the remaining unmet employment need will be distributed as agreed in the Leicester and Leicestershire Housing and Employment Need Statement of Common Ground?
35. Given that the overall employment land need of approximately 67 ha identified in the EDNA, includes approximately 2 ha to address the need for 46,000 sqm of offices (formerly B1a), is Policy SL01 justified in identifying a need for 67 ha of land for industrial, storage and distribution uses, as well as 46,000 sqm of office floorspace?

Policies SL02-06 – Strategic Sites

General questions about Strategic Site Allocations

36. In order to ensure that the plan is positively prepared and effectively achieves sustainable development, are the policies relating to strategic sites sufficiently clear and precise in terms of what is required as part of any development of these allocated sites, including any cross-boundary matters? In this regard, would a northern area wide Masterplan be effective to deliver any infrastructure and policy requirements with an associated delivery and phasing plan?

37. Are Policies SL02 to SL05 in respect of Strategic Sites 1 to 4 sufficiently clear and precise in terms of what is required as part of any development of these allocated sites? Would these policies be effective in guiding the preparation of a Masterplan for each site along with an associated delivery and phasing plan?
38. What are the timescales for the delivery of Masterplans for these strategic sites and who would be responsible for their preparation and delivery?
39. Are the Strategic Sites policies clear in respect of what is required for each in terms of infrastructure provision and delivery, including services and facilities, public open space, education, transport etc?
40. Are the cumulative and cross-boundary impacts of the strategic sites in the north-western part of the Leicester Urban Area on infrastructure understood and effectively addressed in Policies SL01 to SL06?
41. Are the Strategic Site allocations justified, effective and consistent with national policy in respect of their impact upon the Green Wedge?

Policy SL02 – Former Western Park Golf Course

42. Is the housing allocation justified, effective and consistent with national policy, with particular regard to:
 - a) The effect of the development on green space, including the loss of the Green Wedge; trees and woodland; biodiversity, including the Local Wildlife Site; protected species; living conditions of local residents; air quality; pollution; flood risk; traffic and highway safety; infrastructure and facilities?
 - b) The relationship of the site to the existing settlements and its accessibility to local services and facilities?
 - c) The evidence to support the site's 'deliverability' and 'developability', as defined in Annex 2 of the NPPF, and set out in the Housing Allocations and Commitments – Deliverability and Developability 2022/23 [EXAM 9]?
 - d) Its viability, having regard to the provision of any infrastructure, affordable housing and other policy requirements?
43. What evidence is there to show that the historic environment has been fully considered in the process which has led to the allocation of this site for the uses proposed?
44. Should the number of dwellings be set out as a minimum figure in the policy? For example, 'at least 412 homes...'
45. What evidence is there to support the provision of a Household Waste Recycling Centre on this site allocation in advance of the preparation of a new Minerals and Waste Local Plan?

46. Is the inclusion of a Household Waste Recycling Centre on this site compatible with the other uses proposed?
47. When would the first planning application be anticipated for this site?
48. Is the anticipated start date and build out rate realistic and justified?

Policy SL03 – Land to east of Ashton Green

49. Is site SL03 justified as an appropriate location for the proposed development, given that it performs poorly (red) in the SA? How would any proposed mitigation overcome this?
50. Is the housing allocation justified, effective and consistent with national policy, with particular regard to:
 - (a) The effect of the development on green space, including the loss of the Green Wedge; biodiversity; living conditions of local residents; green infrastructure; air quality; pollution; flood risk; traffic and highway safety; infrastructure and facilities?
 - (b) The relationship of the site to the existing settlements and its accessibility to local services and facilities?
 - (c) The evidence to support the site's 'deliverability' and 'developability', as defined in Annex 2 of the NPPF, and set out in the Housing Allocations and Commitments – Deliverability and Developability 2022/23 [EXAM 9]?
 - (d) Its viability, having regard to the provision of any infrastructure, affordable housing, BNG and other policy requirements?
51. Should the number of dwellings be set out as a minimum figure in the policy?
52. Is Policy SL03 sufficiently clear and precise in terms of what is required as part of any development of this allocated site? In this regard, how does this link with the infrastructure required as set out in Appendix 4 of the submitted plan?
53. Which sites are expected to contribute to the costs of the secondary school on this allocation? Will this be expected to cover land and build costs and should this be made clear in the site requirements? What mechanism will be used to share the cost of a new secondary school amongst the developers of other sites?
54. Does the scale of development at the northern edge of Leicester require a new primary school(s) within this site allocation? What evidence is available to support the adopted approach?
55. When would the first planning application be anticipated for this site?
56. Is the anticipated start date and build out rate realistic and justified?

Policy SL04 – Land north of A46 Bypass

57. Is the land north of the A46 at Thurcaston, as identified in Policy SL04, justified as an appropriate location for the development of 420 new homes, given its score in Table 7.2 of the Sustainability Appraisal (SA) [SD/4] as one of the least sustainable strategic sites?
58. Is the housing allocation in Policy SL04 justified, effective and consistent with national policy, with particular regard to:
- (a). The effect of the development on green infrastructure, including the loss of the Green Wedge; biodiversity; the living conditions of existing local residents; air quality; pollution; flood risk; traffic and highway safety; archaeology; and infrastructure and community facilities?
 - (b). The relationship of the site to the existing settlements, including Thurcaston, and its accessibility to local services and facilities?
 - (c). The evidence to support the site's 'deliverability' and 'developability', as defined in Annex 2 of the NPPF, and set out in the Housing Allocations and Commitments – Deliverability and Developability 2022/23 [EXAM 9]?
 - (d). Its viability, having regard to the provision of any infrastructure, affordable housing, BNG and other policy requirements?
59. What evidence is there to show that the historic environment has been fully considered in the process which has led to the allocation of this site for the uses proposed, including any effects on the heritage significance and setting of Thurcaston Conservation Area?
60. Should the requirements for open space, sustainable transport and the other infrastructure necessary to mitigate the impact of the proposed development be specified in the policy to ensure it is effective and consistent with national policy in paragraph 34 of the NPPF?
61. Should the number of dwellings for which the site is proposed, be set out as a minimum figure in Policy SL04 (i.e. 'at least 420 homes') to ensure it is effective in meeting the Plan's housing requirement?
62. When would the first planning application be anticipated for this site?
63. Is the anticipated start date and build out rate realistic and justified?

Policy SL05 – Land west of Anstey Road

64. Is site SL05 justified as an appropriate location for the proposed development, given that it performs poorly (red) in the SA? How would any proposed mitigation overcome this?

65. Is the housing allocation justified, effective and consistent with national policy, with particular regard to:
- (a) The effect of the development on green space, including the loss of the Green Wedge; biodiversity; living conditions of local residents; green infrastructure; air quality; pollution; flood risk; traffic and highway safety; infrastructure and facilities?
 - (b) The relationship of the site to the existing settlements and its accessibility to local services and facilities?
 - (c) The evidence to support the site's 'deliverability' and 'developability', as defined in Annex 2 of the NPPF, and set out in the Housing Allocations and Commitments – Deliverability and Developability 2022/23 [EXAM 9]?
66. The identified measures to improve the sustainability of the site include: good public transport accessibility; retention of broadleaf woodland; ecological protection and enhancement; retention of existing drainage/flood relief basins; and retention of existing boundary hedges 'where feasible'. Is this feasible within the allocation or would these measures make the site unviable, particularly in relation to delivering 30% affordable housing?
67. What would be the impact on transport corridors given the amount of development on the northern edge of the city? What sustainable transportation measures would be put in place to address this?
68. Should the number of dwellings be set out as a minimum figure in the policy?
69. Is Policy SL05 sufficiently clear and precise in terms of what is required as part of any development of this allocated site? In this regard, how does this link with the infrastructure required as set out in Appendix 4 of the submitted Plan?
70. When would the first planning application be anticipated for this site?
71. Is the anticipated start date and build out rate realistic and justified?

Policy SL06 – Beaumont Park

72. Is Strategic Site 5: Beaumont Park justified as an appropriate location for the proposed development in Policy SL06, given its score in Table 7.2 of the Sustainability Appraisal (SA) [SD/4] as only somewhat sustainable?
73. What is the evidence to show that the proposed allocation of Beaumont Park for employment uses and a Gypsy and Traveller transit site in Policy SL06 is justified, effective and consistent with national policy, with particular regard to:

- a). The loss of open space within Beaumont Park – Is this surplus to requirements or would it be replaced by alternative or better provision of open space?
 - b). The accessibility of the site by sustainable modes of transport?
 - c). The effects of the proposed uses on:
 - ecology and biodiversity?
 - the safety and operation of the highway network?
 - air quality?
 - the amenity of the surrounding land uses?
74. Is the site at Beaumont Park suitable for the provision of transit accommodation for Gypsy and Traveller families, taking account of the following:
- a). The alleged history of contamination on the site?
 - b). Its proximity to existing Gypsy and Traveller accommodation sites at Greengate Nook and Red Hill?
 - c). Noise and air quality issues arising from the adjacent highway network and motorsport events at the Beaumont Park Stadium?
 - d). The compatibility of a residential use with the existing and proposed employment uses?
75. Is Policy SL06 clear, unambiguous and effective in respect of the location and distribution of the proposed employment uses and Gypsy and Traveller accommodation within the site and how the remainder of 19.72 ha of land would be used?
76. Are the requirements for ecology, trees, land contamination, design and sports provision referenced in Policy SL06 clearly written and unambiguous, so that it is evident to a decision maker how development proposals should address these issues?

MATTER 3 – HOUSING

Issue 3: Has the Plan been positively prepared and is it justified, effective consistent with national policy in meeting the housing needs of all groups in Leicester over the plan period?

Housing Land Supply

Policy Ho01 – Non-Strategic Housing Allocations

General Questions

77. Is Policy Ho01 effective, given that the housing allocations are not set out in the policy but listed in Appendix 6?
78. To ensure that the implementation of Policy Ho01 is robust and clear for decision makers, should the site specific constraints and proposed mitigations set out in the Non-Strategic Sites Proposed for Allocation in the Draft Leicester Local Plan (2023) [SD/19] be included within the Plan?
79. Was the methodology used to assess and select the proposed site allocations, as set out in the Housing Sites Methodology report [EB/HO/5] robust and appropriate? Are the reasons for selecting the preferred sites and rejecting others clear and where is this set out?
80. How was the historic environment considered in the process for the assessment and selection of the Non-Strategic Housing Allocations? Where is that evidence set out in the supporting evidence base?
81. Are the non-strategic housing allocations deliverable and/or developable in accordance with the timelines set out in the housing trajectory? In particular, are they:
 - a). confirmed by the landowner involved as being available for the development proposed?
 - b). supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?
 - c). deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?
82. Are there any updates to the information contained in the Housing Allocations & Commitments - Deliverability and Developability schedule [EXAM 9] on the delivery status of any of the non-strategic housing allocations?

Appendix 6 Sites - Inner and South Areas

Site 15: Land to south of St Augustine Road/west of Duns Lane

83. How will the development site integrate with the existing businesses, particularly in terms of ensuring that residential use does not have a detrimental effect on employment/economic development?
84. What are the potential adverse impacts of developing the site and how could these be mitigated in terms of: biodiversity; heritage assets; flood risk; and pollution risks. Would policy safeguards and proposed mitigation be sufficiently effective to enable the allocation to be delivered in the Plan period?
85. Would this site allocation enable a positive approach to the use and supply of renewable and low carbon energy and heat as set out in paragraph 155 of the NPPF?

Site 19: Velodrome Saffron Lane

No questions

Site 222: Evington Valley Road (Former Dunlop Works)

86. What are the potential adverse impacts of developing the site and how could these be mitigated in terms of: highway safety; infrastructure provision (particularly education and sports); biodiversity; heritage assets; flood risk; and pollution risks. Would policy safeguards and proposed mitigation be sufficiently effective to enable the allocation to be delivered in the Plan period?

Site 240: 114-116 Western Road

87. What are the potential adverse impacts of developing the site and how could these be mitigated in terms of: biodiversity; heritage assets; and flood risk. Would policy safeguards and proposed mitigation be sufficiently effective to enable the allocation to be delivered in the Plan period?

Site 297: Sturdee Road - The Exchange

No questions

Site 335: Manor House Playing Fields – Narborough Road

88. What are the potential adverse impacts of developing the site and how could these be mitigated in terms of: sports provision, air quality, highway capacity; biodiversity; heritage assets; and flood risk. Would policy safeguards and proposed mitigation be sufficiently effective to enable the allocation to be delivered in the Plan period?

Site 626: Neston Gardens green space/Mud Dumps

89. How will this allocation promote healthy, inclusive and safe places as set out in paragraph 92 of the NPPF?

Site 647: Ranworth Open Space

90. How will this allocation promote healthy, inclusive and safe places as set out in paragraph 92 of the NPPF?
91. What are the potential adverse impacts of developing the site and how could these be mitigated in terms of: biodiversity; heritage assets; and flood risk. Would policy safeguards and proposed mitigation be sufficiently effective to enable the allocation to be delivered in the Plan period?

Site 669: Spendlow Gardens

92. This allocation does not appear to be listed in Appendix B of the 'Sustainability appraisal of the draft Leicester local plan'. Has this site been considered within the Sustainability Appraisal and if 'yes' what was the outcome of this process, or if 'no' why was it excluded?
93. What are the potential adverse impacts of developing the site and how could these be mitigated in terms of: biodiversity; and loss of open space. Would policy safeguards and proposed mitigation be sufficiently effective to enable the allocation to be delivered in the Plan period?

Site 960: Land West of Bede Island Road (Braunstone Gate)

94. Given the site constraints identified in the Sustainability Appraisal and the proposal for student accommodation, is this site appropriate for the residential development proposed and deliverable within the Plan period?

Site 961: Welford Road Playing Fields

95. What are the potential adverse impacts of developing the site and how could these be mitigated in terms of: biodiversity; highway capacity; pollution; flooding; and loss of open space/playing fields/Green Wedge. Would policy safeguards and proposed mitigation be sufficiently effective to enable the allocation to be delivered in the Plan period?
96. How will this allocation promote healthy, inclusive and safe places as set out in paragraph 92 of the NPPF?

Site 963: Southfields Infant School and Newry Specialist Learning Centre

No questions

Site 1030: Land to the west of Dysart Way

97. Is the allocation of this site justified and appropriate, having regard to its current use as open space in a ward and OSSR area with deficiency? How would this be addressed?

Site 1039: Bisley Street / Western Road

98. Is the allocation of this site justified and appropriate, having regard to its current use? What evidence is available to support a change of use from employment land to residential? Would the potential contamination issue render the site unviable?

Site 1051: Gilmorton Community Rooms/Hopyard Close Shops

99. How will this allocation promote healthy, inclusive and safe places as set out in paragraph 92 of the NPPF?

Appendix 6 Sites – North East and South East Areas

100. Given that many of the non-strategic housing allocations within the north east and south east areas of the City are on land currently used for open space and recreation, has the Council considered the cumulative impact of the loss of these sites on the provision of open space within these areas of the city, as well as the likely increase in demand for such open spaces following the construction of the proposed new dwellings? How would this be addressed?

Site 219: Land rear of Rosedale Avenue/Harrison Road allotments

101. Is the allocation of this former allotments site for 53 dwellings justified and appropriate, having regard to the access constraints adjacent to the entrance to a primary school, the presence of mature trees along the route of the proposed access and the biodiversity value of the former allotment site?
102. Are the anticipated start date of 2031/32 and the expected build out rates of 27 dwellings in 2031/32 and 26 dwellings in 2032/33 set out in EXAM 9 realistic and achievable, given that options for delivery have still to be explored?

Site 307: Mary Gee Houses - 101-107 Ratcliffe Road

103. Does the residential capacity of 40 new dwellings on Site 307 take into account the loss of existing dwellings on the site? Would the result be a net increase or decrease in dwelling numbers?
104. How has the site's location within the Stoneygate Conservation Area and within the setting of nearby listed buildings informed the dwelling capacity and density of Site 307?
105. Given that a full planning application is not expected until mid-late 2024, and the need for demolition and clearance of the existing buildings on site, is it realistic for house building to start in 2024/25 and the site to be completed in 2027, as set out in EXAM 9?

Site 481: Brent Knowle Gardens

106. Is the allocation of Brent Knowle Gardens for housing development of 12 dwellings justified and appropriate, having regard to its significant visual amenity value within the surrounding residential area and its use as informal open space, within an area which is deficient in open space?
107. How will this allocation and the loss of open space that would result help to promote healthy, inclusive and safe places, as set out in paragraph 92 of the NPPF?
108. Is the expected date of 2027 for a planning application to be submitted and an anticipated start date of 2028/29, as set out in EXAM 9, realistic and achievable, given that options for the delivery of the site have still to be explored?

Site 488: Carter Street/Weymouth Street/Bardolph Street East

109. Given that Site 488 is in multiple ownership, with active employment uses operating from the premises on site, and an objection to housing from one of the landowners, is the continued allocation of this site for housing justified and realistic?
110. What is the nature and extent of the other constraints on Site 488, as summarised in the Non-Strategic Sites Proposed for Allocation in the Draft Leicester Local Plan (2023) [SD/19], including the Children's and Young People's Space, flood risk, easement and heritage impacts?
111. How would the proposed modification to reduce the site area and the allocation to 19 dwellings effectively address the known constraints?

Site 501: Croyland Green

112. Is the allocation of Croyland Green for housing development of 9 dwellings justified and appropriate, having regard to its visual amenity value within surrounding housing estate and its use as informal open space, within an area which is deficient in open space?
113. How will this allocation and the loss of open space that would result help to promote healthy, inclusive and safe places, as set out in paragraph 92 of the NPPF?
114. Is the expected date of 2028 for a planning application to be submitted and an anticipated start date of 2028/29, as set out in EXAM 9, realistic and achievable, given that options for the delivery of the site have still to be explored?

Site 559: Judgemeanow Community College Playing Fields

115. Is the allocation of Site 559 for housing development of 13 dwellings justified and appropriate, having regard to its current role as part of a school playing field and open space within a Green Wedge, the purposes of which in Policy OSSR01 are to provide a green lung into urban areas and a recreational resource?
116. How will this allocation and the loss of open space that would result help to promote healthy, inclusive and safe places, as set out in paragraph 92 of the NPPF?
117. What is the status of the EDDR route and how would it affect the development potential of site 559?
118. Should the measures required to mitigate the potential effects of housing development on site 559 on the heritage significance of nearby designated and non-designated heritage assets be included within Policy Ho01 or the supporting text for clarity and effectiveness?
119. Is the expected date of 2032 for a planning application to be submitted and an anticipated start date of 2033/34, as set out in EXAM 9, realistic and achievable, given that options for the delivery of the site have still to be explored?

Site 577: Land adjacent Keyham Lane/Preston Rise

120. Is the allocation of site 577 for housing development of 23 dwellings justified and appropriate, given the loss of open space that would result? How will this help to promote healthy, inclusive and safe places, as set out in paragraph 92 of the NPPF?
121. Is the expected date of 2028 for a planning application to be submitted and an anticipated start date of 2031/32, as set out in EXAM 9, realistic and achievable, given that options for the delivery of the site have still to be explored?

Site 620: Morton Walk Open Space

122. Is the allocation of the Morton Walk open space for housing development of 9 dwellings justified and appropriate, having regard to its amenity value in providing visual relief amongst the industrial and commercial buildings on Morton Walk and its function as both formal and informal recreational space?
123. Is the expected date of 2029 for a planning application to be submitted and an anticipated start date of 2030/31, as set out in EXAM 9, realistic and achievable, given that options for the delivery of the site have still to be explored?

Site 629: Netherhall Road Open Space

124. Is the allocation of approximately half of the Netherhall Road Recreation Ground for housing development of 77 dwellings justified and appropriate, having regard to its value as open space, for formal and informal recreation and as a visual amenity within Scraftoft?
125. How will this allocation and the loss of open space that would result help to promote healthy, inclusive and safe places, as set out in paragraph 92 of the NPPF?
126. Is the expected date of 2029 for a planning application to be submitted and an anticipated start date of 2030/31, as set out in EXAM 9, realistic and achievable, given that options for the delivery of the site have still to be explored?

Site 631: Newlyn Parade/Crayford Way

127. Is the allocation of open space between Newlyn Parade, Crayford Way, Selby Avenue and Limehurst Road for housing development of 13 dwellings justified and appropriate, having regard to its visual amenity value within the surrounding estate and its use as informal recreational open space?
128. How will this allocation and the loss of open space that would result help to promote healthy, inclusive and safe places, as set out in paragraph 92 of the NPPF?
129. Is the expected date of 2029 for a planning application to be submitted and an anticipated start date of 2030/31, as set out in EXAM 9, realistic and achievable, given that options for the delivery of the site have still to be explored?

Site 648: Rayleigh Green

130. Is the allocation of Rayleigh Green for housing development of 18 dwellings justified and appropriate, having regard to its visual amenity value within the surrounding estate and its use as informal recreational open space?
131. How will this allocation and the loss of open space that would result help to promote healthy, inclusive and safe places, as set out in paragraph 92 of the NPPF?
132. Is the expected date of 2029 for a planning application to be submitted and an anticipated start date of 2029/30, as set out in EXAM 9, realistic and achievable, given that options for the delivery of the site have still to be explored?

Site 684: Land adjacent to Evington Leisure Centre

133. Is the allocation of green space adjacent to Evington Leisure Centre for housing development of 15 dwellings justified and appropriate, having regard, in particular, to its visual amenity and biodiversity value within the surrounding estate?
134. How will this allocation and the loss of open space that would result help to promote healthy, inclusive and safe places, as set out in paragraph 92 of the NPPF?
135. Is the expected date of 2029 for a planning application to be submitted and an anticipated start date of 2029/30, as set out in EXAM 9, realistic and achievable, given that options for the delivery of the site have still to be explored?

Site 715: Land north of Gartree Road

136. Is the allocation of land north of Gartree Road for housing development of 35 dwellings justified and appropriate, having regard to its current role as part of a Green Wedge, the purposes of which in Policy OSSR01 are to prevent settlements merging, provide a green lung into urban areas and act as a recreational resource?
137. How will this allocation and the loss of open space that would result help to promote healthy, inclusive and safe places, as set out in paragraph 92 of the NPPF?
138. Given the location of this site within Flood Zone 2, does its allocation for housing satisfy the Sequential Test in paragraph 162 of the NPPF?
139. What account has been taken of potential effects of the proposed allocation on heritage assets, including the Scheduled Monument Moated site to the north, and the nationally important archaeology at the site?
140. If, according to the evidence in EXAM 9, house building on this site is expected to take around 18 months to complete, is the projected build out rate of all 35 dwellings in 2029/30 accurate?

Site 962: Amenity land between Coleman Road and Goodwood Road

141. Is the allocation of the amenity land at site 962 for housing development of 9 dwellings justified and appropriate, given the loss of mature trees that would result?
142. Is the expected date of 2026/27 for a planning application to be submitted, an anticipated start date of 2027/28 and completion in 2028, as set out in EXAM 9, realistic and achievable, given that options for the delivery of the site have still to be explored?

Site 1035: VRRE/Gipsy Lane

143. What consultation was undertaken by the Council with the landowner of site 1035 as part of the assessment of sites suitable for allocation for housing in the Plan?
144. What effect would the Council's proposal to delete site 1035 from the list of non-strategic housing allocations have on the Plan's proposed housing land supply?

Site 1037: Spence Street

145. Is the allocation of site 1037 for housing justified and consistent with national policy, given its location in an area at high risk of flooding?
146. In light of the constraints to be addressed to deliver the redevelopment of site 1037 for housing, including multiple ownership, relocation of existing uses, and the range of mitigation measures required, including for flood risk, what evidence is there that this site will be available and could be viably developed within the Plan period?

Site 1041: Land off Hazeldene Road adjacent to Kestrel's Field Primary School

147. Is the allocation of site 1041 for 21 dwellings justified and realistic, given its Local Wildlife Site status and the unresolved access issues?
148. Is the expected date of 2031 for a planning application to be submitted, an anticipated start date of 3032/33 and completion in 2033, as set out in EXAM 9, realistic and achievable, given that options for the delivery of the site have still to be explored?

Appendix 6 Sites – North West and West Areas

149. Given that many of the allocated sites within the north-west and west of the City are currently used for open space and recreation, has the Council considered the cumulative impact of the loss of these sites for these uses as well as the likely increase in demand for such spaces following the construction of the proposed new dwellings? How would this be addressed?

Site 190: Lanesborough Road – Former Allotments

150. Is the allocation of this site for 37 dwellings justified and appropriate, having regard to access and car parking, and the living conditions of neighbouring residents?
151. Is the anticipated start date of Spring 2025 set out in EXAM 9 realistic given the requirement to manage the existing ecology and biodiversity in line with reports/surveys?

152. Is the expected build out rate (10 dwellings in 2025/26 and 27 dwellings in 2026/27) and completion date of 2027 for this site appropriate?

Site 449: Allexton Gardens Open Space

153. Is the allocation of this site for 25 dwellings justified and appropriate, having regard to its current use as open space?

154. Is the anticipated start date (2029/30), build out rate (25 dwellings in 2030/31) and completion date (2031) realistic given that the site does not yet benefit from planning permission and the Council is yet to explore options for delivery and routes to market the site?

Site 525: Fulford Road Open Space

155. Is the allocation of this site for 58 dwellings justified and appropriate, having regard to ecology and biodiversity, air pollution, local services and infrastructure, and its current use as open space?

156. Is the anticipated start date (2029/30), build out rate (30 dwellings in 2029/30; 28 dwellings in 2030/31) and completion date (2031) realistic given that the site does not yet benefit from planning permission and the Council is yet to explore options for delivery and routes to market the site?

Site 529: Glovers Walk Open Space

157. Is the allocation of this site for 34 dwellings justified and appropriate, having regard to its current use as open space?

158. Is the anticipated start date (2033/34), build out rate (17 dwellings in 2033/34; 17 dwellings in 2034/35) and completion date (2035) realistic given that the site does not yet benefit from planning permission and the Council is yet to explore options for delivery and routes to market the site?

159. What is meant by the change in commercial needs for the site referred to in EXAM 9? Would this impact upon the developability of this site?

Site 549: Hockley Farm Road Open Space

160. Is the allocation of this site for 8 dwellings justified and appropriate, having regard to its current use as open space?

161. Would this site be suitable for specialist older persons' housing and, if so, should the site capacity be increased?

162. Is the anticipated start date (2033/35) set out in EXAM 9 correct – or should it be 2034/35?

163. Is the anticipated start date, build out rate (8 dwellings in 2034/35) and completion date (2035) realistic given that the site does not yet benefit

from planning permission and the Council is yet to explore options for delivery and routes to market the site?

164. What is meant by the change in commercial needs for the site referred to in EXAM 9. Would this impact upon the developability of this site?

Site 557: Ingold Avenue Open Space

165. Is the allocation of this site for 54 dwellings justified and appropriate, having regard to ecology and biodiversity, air, light and noise pollution, local services and infrastructure, and its current use as open space?
166. Is the anticipated start date (2028/29), build out rate (10 dwellings in 2029/30; 26 dwellings in 2030/31; 18 dwellings in 2031/32) and completion date (2032) realistic given that the site does not yet benefit from planning permission and the Council is yet to explore options for delivery and routes to market the site?

Site 569: Krefeld Way/Darenth Drive Open Space

167. Is the allocation of this site for 33 dwellings justified and appropriate, having regard to ecology and biodiversity, existing trees, local services and infrastructure, and its current use as open space?
168. Is the anticipated start date (2028/29), build out rate (4 dwellings in 2028/29; 16 dwellings in 2029/30; 13 dwellings in 2030/31) and completion date (2031) realistic given that the site does not yet benefit from planning permission and the Council is yet to explore options for delivery and routes to market the site?

Site 589: Land to the east of Beaumont Leys Lane

169. Is the allocation of this site for 34 dwellings justified and appropriate, having regard to ecology and biodiversity, air, light and noise pollution, local services and infrastructure, and its current use as open space?
170. Is the anticipated start date (2030/31), build out rate (4 dwellings in 2030/31; 16 dwellings in 2031/32; 14 dwellings in 2032/33) and completion date (2033) realistic given that the site does not yet benefit from planning permission and the Council is yet to explore options for delivery and routes to market the site?

Site 646: Rancliffe Gardens

171. Is the allocation of this site for 52 dwellings justified and appropriate?
172. Is the anticipated start date (2033/34), build out rate (26 dwellings in 2033/34; 26 dwellings in 2034/35) and completion date (2035) realistic given that the site does not yet benefit from planning permission and the Council is yet to explore options for delivery and routes to market the site?

Site 992: Woodstock Road

173. Is the allocation of this site for 5 dwellings justified and appropriate?
174. Is the anticipated start date (2031/32), build out rate (5 dwellings in 2031/32) and completion date (2032) realistic given that the site does not yet benefit from planning permission and the Council is yet to explore options for delivery and routes to market the site?

Site 1001: Phillips Crescent

175. Is the allocation of this site for 5 dwellings justified and appropriate, having regard to its current use as green space?
176. Is the anticipated start date (2031/32), build out rate (5 dwellings in 2031/32) and completion date (2032) realistic given that the site does not yet benefit from planning permission and the Council is yet to explore options for delivery and routes to market the site?

Site 1007: Glazebrook Square

177. Is the allocation of this site for 12 dwellings justified and appropriate, having regard to highway safety and its current use as green space?
178. Is the anticipated start date (2027/28), build out rate (12 dwellings in 2028/29) and completion date (2029) realistic given that the site does not yet benefit from planning permission and the Council is yet to explore options for delivery and routes to market the site?

Site 1034: Forest Lodge Education Centre, Charnor Road

179. Is the allocation of this site for 26 dwellings justified and appropriate, having regard to existing trees and the living conditions of neighbouring residents, and its current use as green space?
180. Has the planning application been submitted for 33 dwellings on this site?
181. Is the anticipated start date (2024/25), build out rate (3 dwellings in 2024/25; 30 dwellings in 2025/26) and completion date (2026) realistic given that the site does not yet benefit from planning permission?

Site 1042: Land off Heacham Drive (Former Playing Fields)

182. Is the allocation of this site for 53 dwellings justified and appropriate, having regard to its previous use as playing fields?
183. Should the capacity of this site be increased from 53 to 60 dwellings to reflect the pre-application?
184. Is the anticipated start date, within 18 months of securing planning permission, build out rate (27 dwellings in 2027/28; 26 dwellings 2028/29) and completion date (2029) realistic given that the site does not yet benefit from planning permission?

185. Should the housing trajectory be amended to reflect the likely increase in the number of dwellings on this site?

Policy Ho02 – Housing Development on Unallocated Sites

186. Given that housing development on unallocated sites does not form part of the spatial strategy in Policy SL01, is it clear how such proposals would accord with it?

187. Are criteria a) and c) of Policy Ho02 justified and consistent with national policy in making it a policy requirement for proposals on unallocated sites to comply with supplementary planning documents and design guides/codes, which do not form part of the development plan?

188. For clarity and effectiveness, should criterion b) of Policy Ho02 cross refer to Policy DI01 on Developer Contributions and Infrastructure with regard to the requirement to provide new infrastructure?

Windfall allowance

189. Is the allowance of 214 dpa for windfall sites from year 4 to the end of the Plan period justified, based on proportionate and compelling evidence of windfalls as a reliable source of supply, in addition to non-strategic site allocations?

Central Area Capacity

190. Is the delivery of 6,286 dwellings within the Central Development Area of the City justified by the evidence and likely to be delivered within the Plan period?

Commitments

191. Are the housing sites with planning permission deliverable or developable within the timescales set out in the housing trajectory, based on the evidence in Housing Allocations & Commitments – Deliverability and Developability spreadsheet [EXAM 9]?

5-year Housing Land Supply

192. Does the evidence suggest that there is likely to be a 5-year supply of deliverable housing sites in Leicester on adoption of the Plan and a rolling 5-year supply from then onwards to the end of the Plan period?

Overall Housing Land Supply

193. Overall, does the evidence demonstrate that the supply of housing land would be adequate to meet the housing requirements of Leicester over the Plan period?

Other Housing Policies

Policy Ho03 – Housing Mix including Adaptable and Accessible Homes

194. Does Policy Ho03 adequately explain what is meant by “Achieve a mix of house types, tenures and sizes” having regard to paragraphs 60 and 63 of the NPPF?
195. The optional technical standards in relation to accessibility should only be required if they address a clearly evidenced need and where their impact on viability has been considered. What is the evidence in relation to need and viability for the proposed access standards in Policy Ho03?
196. Will Policy Ho03 and reference to Tables 2 and 3 of the supporting text be effective in helping to ensure that the need for different types of homes, particularly for older persons, in different parts of the city are met throughout the Plan period?
197. Is it intended to apply Policy Ho03 to all housing developments regardless of scheme size?
198. For clarity should Policy Ho03 cross reference to other policies that refer to specific housing types, such as self-build?
199. Should criterion b) of Policy Ho03 be amended to include reference to the higher standard of M4(3) given the evidence that more wheelchair accessible accommodation will be / is required?
200. Whilst it is accepted that Policy Ho06 deals with the implementation of self-build/custom build housing, should the requirement for this type of housing be set out in criterion a) of Policy Ho03, particularly given the current shortfall of such plots?

Policy Ho04 – Affordable Housing

201. What are the past trends in affordable housing delivery in terms of completions and housing type and tenure? How is this likely to change in the future?
202. Are the requirements of Policy Ho04, at criterion a), justified by adequate, proportionate and up to date evidence about need and viability?
203. Is the reference in Policy Ho04 to 75% of the affordable homes being for rent and 25% for low cost home ownership justified? Is it consistent with the national policy expectation that 10% of homes on major sites should be available for affordable home ownership (NPPF paragraph 66)?
204. Given that the requirement for affordable homes arises from the need of the City’s population, is the approach to require 0% affordable housing within the CDA justified? What evidence is there to show that

affordable housing in the CDA is not required? What is the evidence to support the Council's decision to support space standards in terms of viability and not affordable housing within the CDA?

205. The Planning Practice Guidance states that an increase in the total housing figures included in the Plan may need to be considered where it could help deliver the required number of affordable homes. Has the Council considered this?
206. Is it sufficiently clear what would forms 'an exceptional circumstance' to justify off site provision of affordable housing referred to in criterion d) of Policy Ho04?
207. What is the timescale for the preparation of the separate guidance on commuted sums and their calculation, referred to in paragraph 5.28 of the Plan? Would it be consistent with national policy to include this as supplementary guidance, given that the PPG states it is not appropriate to set out new formulaic approaches to planning obligations in Supplementary Planning Documents or supporting evidence base documents, as these would not be subject to Examination? To be effective should these matters be set out in the Plan?
208. Does the evidence in the Whole Plan Viability Study support the proposed viability zones in Diagram 3? Are the boundaries of these zones clear enough for Policy Ho04 to be effective?

Policy Ho05 – Housing Densities

209. Should housing densities in the CDA be guided by design codes and the data collected for the Character Areas rather than the standard figure in Policy Ho05?
210. What evidence is there to support the minimum density figure cited in Policy Ho05? In stating a minimum amount of development per hectare would the policy reduce the flexibility / innovation of developers to optimise the use of the land?
211. Would Policy Ho05 be effective in optimising the density of development and making effective use of land in line with chapter 11 of the NPPF?
212. What assumptions have been applied in the SHLAA or other site-specific evidence in terms of the density/capacity of site allocations, particularly where the SA concludes that the overall impact of Policy Ho05 is mixed?

Policy Ho06 – Self-Build and Custom Build

213. What is the demand for Self-Build and Custom Build plots within Leicester?
214. Is Policy Ho06 clearly written, effective and positively prepared? Would it be apparent how a decision maker should react to development

proposals for housing with regard to any provision of Self-Build and Custom Build plots? Would the policy as drafted ensure that sufficient plots are made available to meet the demand for Self-Build and Custom Build homes?

215. Is Policy Ho06 consistent with national policy in the NPPF and PPG in respect of the provision of Self-Build and Custom Build homes?
216. Should Policy Ho06 set out what should happen to Self-Build/Custom Build plots if they are not developed for this purpose within a set period of time?

Policy Ho07 – Internal Space Standards

217. Is the requirement in Policy Ho07 for all new housing to meet the Nationally Described Space Standard as a minimum justified by adequate, proportionate and up to date evidence about need, viability and timing? Does this policy ensure the most efficient use of CDA sites?
218. Should there be a transitional period between the date of the Local Plan adoption and the date that the NDSS requirement will come into force, in order to allow developers to factor in the cost of space standards into future land acquisitions?

Policy Ho08 – Student Accommodation

219. In the absence of site allocations for student accommodation, is the Plan positively prepared and effective in respect of its provision to meet the need for student accommodation in the City?

Policies Ho09 and Ho10 – Retention of Family Housing and Houses in Multiple Occupation

220. Is Policy Ho09 positively prepared, justified, effective and consistent with national policy?
221. Does Policy Ho10 provide effective guidance to applicants and decision makers with regard to how the impact of development proposals on communities will be assessed? Are the criteria relevant, justified and effective in this respect? Is there a methodology for determining areas with significant concentration of houses in multiple occupation/student households referred to in criterion b)?

Policy Ho11 – Hostels

222. Is there evidence to justify that the approach taken in Policy Ho11 would ensure that it would effectively meet the need for hostel accommodation in the City?
223. To positively plan for a mix of housing, should this policy seek to resist the loss of existing hostel accommodation or require it to be replaced elsewhere if lost?

Policy Ho12 – Gypsy and Traveller Accommodation

224. Does the Gypsy and Traveller Accommodation Assessment (GTAA) [EB/HO/2 and 2a] provide a robust evidence base to establish the need for Gypsy and Traveller accommodation in the City to 2036, including the needs of 'unknown' households and households that do not meet the definition of Gypsies and Travellers in Annex 1 of the Planning Policy for Traveller Sites (PPTS), taking account of the amended definition of Gypsies and Travellers in the December 2023 update to the PPTS?
225. Does Policy Ho12 provide for the accommodation needs of Gypsy and Traveller households, who are in need of culturally appropriate accommodation, but who do not meet the definition of Gypsies and Travellers in Annex 1 of the PPTS, as revised?
226. Are the principles in Policy Ho12 for determining proposals for Gypsy, Traveller and Travelling Showpeople sites consistent with national policy in the PPTS?
227. Are the two sites identified for transit sites (SL06 and E01) suitable and appropriate for residential uses being located within employment areas?

MATTER 4 – EMPLOYMENT

Issue 4: Has the Plan been positively prepared and is it justified, effective and consistent with national policy in respect of its policies and proposals for employment land and development in Leicester?

Provision and Supply of Employment Land (Use Classes E(g), B2 & B8)

228. Is the supply of employment sites in the Plan, allocated in Policies SL01, SL02, SL03, SL06, E01, CHA01 and CHA07 and listed in Table 8 of part 12 of the Plan, adequate in quantitative and qualitative terms, to meet the needs for employment floorspace for offices, light/general industry and small scale storage and distribution uses identified in Policy SL01?
229. What is the status of the Section 73 planning application for the change of use of 13 ha of land at Ashton Green to employment uses?
230. Given that Policy SL01 identifies a need for 46,000 sqm of office floorspace and Policies CHA01 and CHA07 only allocated land for approximately 40,000 sqm, where and how would the balance of 6,000 sqm of office floorspace be met?

Strategic Distribution and Logistics Floorspace Need and Supply

231. Should the Plan set out the requirements for Strategic Logistics & Warehousing floorspace in the Leicester and Leicestershire area up to the end of the Plan period, and how this will be planned for on a cross-boundary basis with neighbouring authorities?

Policy E01 – Non-strategic Economic Development Areas

232. Is the proposal to redevelop the Thurstaston Road /Hadrian Road open space for employment uses and a transit site for gypsy and traveller accommodation in Policy E01, justified as appropriate, based on proportionate evidence, including the provision of open space in the surrounding area, and taking account of the reasonable alternatives?
233. Would the location of industrial and distribution uses be compatible with a residential use for gypsy and traveller accommodation on the Thurstaston Road /Hadrian Road open space site, with regard to noise and disturbance, site security, access and traffic movements?
234. Are the two sites identified in Policy E01 suitably located and likely to be developed for employment uses during the Plan period? What is the evidence to demonstrate this?

Policy E02 – General Economic Development Areas

235. Does the evidence provided in the Economic Development Needs Study 2020 [EB/EM/1] demonstrate the need to retain all of the General Economic Development Areas (GEDAs) for employment use? Should greater flexibility be allowed in Policy E02 for the development of

alternative uses in the GEDAs, such as residential or student accommodation, where evidence shows there is no longer a reasonable prospect of applications coming forward for employment uses within Classes E(g)iii), B2 and B8?

236. Is Policy E02 justified in not allowing portal framed buildings within the GEDAs to be converted for uses within Use Classes D, E and F?
237. Are criterion b) of Policy E02 and paragraph 12.27 of the supporting text justified and consistent with national policy in seeking the use conditions to restrict permitted development rights for changes of use within Class E of the Use Classes Order?

Policy E03 - High Quality Economic Development Areas

238. In light of the recommendations of the EDNA, should Policy E03 set out the circumstances in which non-E(g)(iii) and B Class uses would be appropriate within the High Quality Economic Development Areas (HQEDAs), such as to provide on-site support facilities or an economic enhancement, in order that the policy is justified against the evidence and effective in maintaining the economic functioning of the HQEDAs?

Policy E04 – Pioneer Park

239. The part of Pioneer Park located north of Corporation Road lies within Flood Zone 2 as an area at medium probability of flooding. What evidence is there that the allocation of this part of the site in Policy E04 satisfies the Sequential Test in paragraph 162 of the NPPF, and that there are not reasonably available sites for the proposed development in areas at lower risk of flooding?
240. In order to satisfy the terms of national policy in paragraph 167 of the NPPF (September 2023 version), should Policy E04 require buildings to be designed to be flood resistant and resilient?
241. What evidence is there that the areas of the site that remain undeveloped, are likely to be developed during the Plan period as assumed in the Plan?

Policy E05 – Textile Area and Neighbourhood Employment Areas

242. Does Policy E05 set out an effective and positive approach to the growth, management and adaptation of the city's Neighbourhood Employment Areas. In particular, is the wording of the policy clear and unambiguous in respect of the opportunities for and constraints on housing development within these areas?
243. Are criterion b) of Policy E05 and paragraph 12.35 of the supporting text justified and consistent with national policy in seeking the use conditions to restrict permitted development rights for changes of use within Class E of the Use Classes Order?

Policy E06 - St. George's Cultural Quarter

244. Is Policy E06 clearly written and unambiguous in respect of the range of uses that will be encouraged in the St. George's Cultural Quarter? In particular:
- (a) In part a) of the policy, would it be evident to a decision maker whether proposals for a mix of uses should include all of the uses specified or any combination of design studios, workspaces, residential uses and offices?
 - (b) In part b) of the policy, should retail uses falling within Class E(a) also be allowed to contribute to active street frontages on Halford Street and Rutland Street, given that paragraph 12.38 of the supporting text refers to shops as well as restaurants and cafes?
245. Are the design requirements set out in Policy E06 clearly written and unambiguous? Should part a) of the policy specify that the design of proposals should be sympathetic 'to the character of the Quarter' and should the supporting text set out the key components of its unique character?
246. Overall, does the combination of Policies CHA07 and E06 comprise an effective and positive approach to the growth, management and adaptation of the St. Georges Cultural Quarter, that reflects its unique character?

Policy E07 - Employment: Support Strategies

247. Is Policy E07 clearly written and would it be effective in managing proposals for major development? In particular:
- (a) Is criterion a) necessary, given that it duplicates the wording of paragraph 12.40 of the supporting text and is an ambition rather than a policy requirement?
 - (b) Should criterion b) specify that Employment and Skills Plans be provided by developers 'submitting' rather than implementing' planning applications for major development?
 - (c) Do criteria c), d) and e) serve a clear purpose in relation to development proposals and would it be clear how a decision maker should apply them to planning applications? Should they form part of the supporting text to Policy E07?

Policy E08 – Vehicles Sales and Car Washes

248. Is Policy E08 clearly written, effective and consistent with national policy? In particular:
- (i). In criterion a), should the test be whether a proposal would result in 'unacceptable harm to' rather than a 'significant loss of' residential amenity?

- (ii). In criterion d), what would be regarded as a significant increase in vehicle trips, and would this be consistent with the wording of paragraph 111 of the NPPF, which states that development should only be refused on highway grounds if there would be an unacceptable impact on highway safety, or the cumulative impacts on the road network would be severe?
- (iii). In criterion e), should the aim be to avoid over concentration of such uses on any main road through the City, rather than just radial routes?
- (iv). In the last sentence of the policy, should 'limited period consent' be worded as 'temporary planning permission' to ensure consistency with the PPG on the Use of Planning Conditions⁸?

⁸ PPG Paragraph: 014 Reference ID: 21a-014-20140306

MATTER 5 - TOWN CENTRE AND RETAIL

Issue 5: Has the Plan been positively prepared and is it justified, effective and consistent with national policy in respect of its policies and proposals for town centres and retail development in Leicester?

Retail Floorspace Needs

249. In order to be positively prepared and consistent with national policy in paragraph 86d) of the NPPF, should the Town Centre and Retail policies set out a clear strategy for how the City will meet the convenience and comparison retail floorspace needs of Leicester, as identified in the Retail and Leisure Study [EB/TC/1], looking at least 10 years ahead?

Policy TCR01 - Hierarchy of Town Centres

250. Should reference be made in Policy TCR01 to the boundaries of the City, Town, District and Local Centres, as defined on the Policies Map, to ensure clarity for decision makers and applicants on how the sequential test would be applied to proposals for the development of town centre uses on sites on the edge of these centres?

251. Is the sequential test as set out in Policy TCR01 consistent with its expression in national policy in paragraphs 87 and 88 of the NPPF?

Policy TCR02 - Supporting Sustainable Town Centres – Impact Assessments

252. Are the floorspace thresholds for impact assessments for retail and leisure proposals, set out in Policy TCR02, justified as appropriate, based on proportional evidence? Where is that evidence set out in the supporting Retail and Leisure Study 2021 [EB/TC/1]?

Policy TCR03 – City Centre

253. Is Policy TCR03 clearly written and unambiguous in respect of the requirements of development proposals on sites within the City Centre to safeguard, contribute to and strengthen its role in the retail hierarchy?

254. For clarity and effectiveness, should Policy TCR03 be amended to make clear that the heritage effects of proposals for development within the City Centre boundaries will be determined by reference to Policies HE01 and HE02, in terms of the balance between benefits and harms?

Policy TCR04 - Central Shopping Core (Primary Shopping Area)

255. Is Policy TCR04 clearly written and unambiguous, so that it will be evident how a decision maker should react to proposals for non-retail uses within the Central Shopping Core (CSC)? In particular:

Criterion a) - How would the location and prominence of a unit determine its suitability for a non-retail use?

Criterion b) - What level of activity or footfall would be considered acceptable?

Criterion c) – Should this make clear that for a non-retail use to be acceptable the shop front should be retained?

Criterion d) – Should it be clear that a non-retail use must retain an active ground floor use and street frontage?

Criterion f) - How long a unit would need to be vacant before a non-retail use would be considered?

Criterion g) – Would the available alternative units need to be within the CSC or would the search need to extend to other centres?

Criterion h) – What scale and size of use that would be acceptable?

Criterion j) – For consistency with national policy should the requirement be that proposals affecting a heritage asset should preserve its heritage significance in the case of a listed building or preserve or enhance its character and appearance in respect of a Conservation Area?

256. Is the penultimate paragraph of Policy TCR04 consistent with the provision in criterion b), which allows for consideration to be given to the level activity of a proposed non-retail use in determining its acceptability? Would it be evident how a decision maker should apply these two differing considerations to a non-retail use?

Policy TCR05 - Town Centre Uses in Town/ District and Local Shopping Centres

257. To ensure that Policy TCR05 is positively worded and unambiguous, so that it is clear how a decision maker should react to relevant proposals, should the following changes be made:

(i). Amend the second sentence of the policy to make clear that:
'Proposals for main town centre uses will be actively supported within the town, district and local shopping centres, subject to the following criteria:'

(ii). Reword the criteria accordingly as follows:

Criterion a) - 'The proposal would not prejudice the use of upper floors for residential use.'

Criterion b) – 'The scale and design would be sympathetic to the size and character of the centre and its role in the hierarchy.'

Criterion c) – 'It would not have an unacceptable impact on highway safety'.

Criterion d) – ‘It would contribute to a diversity of uses within the centre and not harm its retail function.’

Criterion e) – ‘It would maintain and enhance the vitality and viability and character of the shopping area.’

Policy TCR06 - Development for Food and Drink Purposes

258. Is Policy TCR06 clearly written and effective in managing the development of proposals for food and drink purposes? In particular:
- (i). Should the uses to which the policy applies, be consistently stated as, ‘hot food takeaway and food and drink uses’, including in the title to the policy?
 - (ii). Should the effect on the vitality and viability of the relevant centre be included as a criterion? (e.g. ‘Proposals will be permitted where: they would not have a significant negative impact, either individually or cumulatively, on the vitality and viability of the centre’)?
 - (iii). In criterion a), should the reference to amenities of nearby occupiers be referred to as ‘living conditions’ to distinguish them from ‘visual amenity’?
 - (iv). Is it clear what the term ‘visual amenity’ means in this context and should it be defined or an alternative term such as ‘character and appearance’ be used?

Policy TCR07 - Neighbourhood Parades

259. Is criterion c) of Policy TCR07 clearly written and unambiguous in respect of the circumstances in which residential uses will be permitted in Neighbourhood Parades? Should the criterion read as follows:
- ‘Changes of use to residential will be on upper floors or to the rear on the ground floor and a satisfactory living environment can be achieved.’?

Policy TCR08 - Main Town Centre Development Outside of Defined Centres

260. To ensure criterion c) of Policy TCR08 is consistent with national policy in paragraph 111 of the NPPF, should it require that ‘The proposed development would not result in an unacceptable impact on highway safety.’?

Policy TCR09 - Planning Conditions: Main Town Centre Development and Class E Uses Outside of a Defined Centre

261. Is Policy TCR09 consistent with national policy in setting out circumstances for the restriction or removal of certain permitted development rights under the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)?
262. Are the requirements in criteria a) and c) of Policy TCR09 clear and effective, so that it would be evident to a decision maker how to apply these to development proposals?

MATTER 6 – CENTRAL DEVELOPMENT AREA

Issue 6: Has the Plan been positively prepared and is it justified, effective and consistent with national policy in respect of its policies and proposals for the Central Development Area in Leicester?

General Questions on Central Development Area

263. Do the CDA Policies set out an effective and positive approach to the growth, management and adaptation of the centre that reflects its distinctive character(s)? In particular:
- (a) What is the approach to the re-use of empty buildings within the CDAs and how is the approach (if any) guided by the Character Area Assessments?
 - (b) Do the CDA Policies identify sufficient opportunities to ensure that anticipated needs for retail, leisure and other main city centre uses over the next ten years will not be compromised by limited site availability?

Policy CDA01 – Central Development and Management Strategy

264. Is the development proposed in the CDA viable and deliverable within the Plan period? What is the situation in relation to land ownership and developer interest?
265. Is it clear how and where the 6,286 homes referred to in Policy SL01 will be provided in the CDA? What is the timescale for the provision of these homes and what evidence is there to justify their development?
266. In the light of the Council's response to the Inspectors' Initial Question 11 [EXAM 1 and 2], that the majority of the student accommodation required in the City will be delivered in the CDA, should Policy CDA01 make explicit provision for it? To ensure the bedspace requirement for the Plan period is met, should student accommodation be identified as a requirement in any of the CDA Character Area policies?
267. How is it intended to bring the sites forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?
268. In what way will the CDA address the Council's priority of addressing the acute affordable housing need within the City?
269. What is the timescale for the production of the supplementary planning documents (SPDs) for the character areas and what will they cover?

Policy CDA02 – New Development within the Character Areas

- 270. Would Policy CDA02 benefit from addressing the 'agent of change' principle rather than relying on the supporting text at paragraph 9.20?
- 271. Is Policy CDA02 consistent with national policy and the statutory duty in respect of heritage assets?
- 272. Would Policy CDA02 be clear and effective in respect of its reliance on further details being provided by subsequent SPDs?
- 273. Are the Character Areas clearly defined on the Policies Map? Should they include the relevant policy number?

Policy CHA01 – The Railway Station

- 274. In its response to representations made to Policy CHA01 'The Railway Station' in its Regulation 22 Statement, the Council refers to a current planning application (20231214). What are the details of this planning application and when is it likely to be determined?
- 275. Would Policy CHA01 be sufficiently clear and effective in order to deliver the high-quality office development sought within this area?
- 276. What is meant by the term 'high-quality'?
- 277. Is it clear how the aims of this policy would be met?
- 278. Would the development, as envisaged by Policy CHA01, be viable?
- 279. Is the use of The Railway Station Character Area for office development appropriate and compatible with neighbouring uses?
- 280. Should Policy CHA01 require future office developments to utilise rainwater harvesting in order to promote sustainable development or would this be better dealt with in Chapter 12 of the Plan as suggested by the Council?

Policy CHA02 – Mansfield Street

- 281. Would Policy CHA02 'Mansfield Street' be sufficiently clear and effective in order to deliver the high-quality residential led regeneration sought within this area?
- 282. What is meant by the term 'high-quality'?
- 283. Is it clear how the aims of this policy would be met?
- 284. Would the development, as envisaged by Policy CHA02, be viable?
- 285. Should the policy specify the number of dwellings expected to be provided within this character area?
- 286. Is the support for other uses including retail and business uses appropriate?

287. Should the amount of new business uses anticipated within this character area be included within the policy?
288. Are the Character Area objectives reflected in the policy requirements, for example in terms of the provision of public spaces, along with a safe, welcoming and pleasant pedestrian and cycle network?

Policy CHA03 – St Margaret’s

289. Would Policy CHA03 ‘St Margaret’s’ be effective in guiding the preparation of a Masterplan for this area?
290. Is it clear how the aims of this policy would be met?
291. Should the policy specify the number of dwellings expected to be provided within this character area, along with the proportion of office and leisure uses?
292. Would the development, as envisaged by Policy CHA03, be viable?
293. Should the policy refer to the use of sustainable drainage?

Policy CHA04 – Wharf Street

294. Would Policy CHA04 ‘Wharf Street’ be sufficiently clear and effective in order to support the continued creation of an emerging residential neighbourhood?
295. Is it clear how the aims of this policy would be met?
296. Should the policy specify the number of dwellings expected to be provided within this character area, along with the proportion of new leisure and community facilities?
297. How would the policy support new retail within the central shopping area and ancillary food and drink uses elsewhere within Wharf Street?
298. What is meant by the term ‘make adequate provision for...’ - is it clear to a decision maker how proposals for new public realm infrastructure should be considered having regard to this policy?
299. Would the development, as envisaged by Policy CHA04, be viable?
300. Should the policy refer to the use of sustainable drainage?

Policy CHA05 – Belgrave Gateway

301. Would Policy CHA05 ‘Belgrave Gateway’ be sufficiently clear and effective in order to support the overall aim of managed residential regeneration?
302. Is it clear how the aims of this policy would be met?
303. Would the development, as envisaged by Policy CHA05, be viable?
304. Should the policy specify the number of dwellings expected to be provided within this character area?

305. What are the expansion needs of Leicester College and how will this be accommodated within the Character Area?
306. How would the policy support and enhance the existing employment uses within the northern area of Belgrave Gateway?
307. On what basis is the provision of new hotel uses justified within Belgrave Gateway and what are the requirements of the 'sequential test' referred to in the Policy? Is this consistent with national policy?

Policy CHA06 – Leicester Royal Infirmary & De Montfort University

308. What evidence is there to support how Policy CHA06 will allow the housing needs of all members of the community to be met, including students, young professionals and individuals on low incomes?
309. Should Policy CHA06 specify the number of dwellings expected to be provided within this character area?
310. How would Policy CHA06 support development directly related to the Leicester Royal Infirmary, De Montfort University and Welford Road Stadium?
311. If the aim of the character area is to positively enhance diversity, how will it prevent over-concentrations of student housing within a community/locality/street/row?
312. Does Policy CHA06 provide clear and effective guidance on constraints and suitable mitigation in terms of the historic environment?
313. This character area contains many 'destination' buildings/facilities which would be accessed by the wider community and by people located outside of the City. How does Policy CHA06 ensure that the area will be connected to the wider City and legible to those accessing it by whatever transport mode?

Policy CHA07 – St George's Cultural Quarter

314. Does Policy CHA07 provide clear and effective guidance on constraints and suitable mitigation in terms of the historic environment?
315. How will Policy CHA07 provide a platform to create a cohesive character area given the strong contrast between the west and east areas?
316. Should Policy CHA07 refer to the use of sustainable drainage?
317. Given the growing residential community, should this policy safeguard cultural activity venues from inappropriate development that might curtail their ability to host events?
318. The vision for 'St. George's Cultural Quarter' is to create a unique and distinctive identity of culture and creativity. Therefore, would it be

justified for Policy CHA07 to encourage the re-use of empty buildings for creative workspace opportunities?

319. How would Policy CHA07 support proposals for small scale office development, leisure uses, food and drink uses and employment and creative development within the character area?

Policy CHA08 – Old Town

320. Does Policy CHA08 provide clear and effective guidance on constraints, enhancement, and suitable mitigation in terms of the historic environment?
321. Given the limited opportunities for development, and therefore financial contributions, how will the area's vision be achieved?
322. Should Policy CHA08 specify the number of dwellings expected to be provided within this character area?
323. How would Policy CHA08 support proposals for the provision of small offices, new retail development and tourist-based leisure uses?
324. What is meant by 'small' offices in the third bullet point of Policy CHA08?

Policy CHA09 – New Walk

325. Does Policy CHA09 provide clear and effective guidance on constraints, enhancement and suitable mitigation in terms of the historic environment?
326. Should Policy CHA09 specify the number of dwellings expected to be provided within this character area?
327. On what basis will small scale offices be delivered; new education uses be allowed; and, retail be promoted within the London Road Shopping Centre by Policy CHA09?
328. What is meant by 'small scale' offices in the second bullet point of Policy CHA09?
329. Given the limited opportunities for development, and therefore financial contributions, how will the area's vision be achieved?
330. How does Policy CHA09 proactively ensure that the area will become 'truly walkable', connected to the wider city and legible to those accessing it?

Policy ORA01 – Abbey Meadows and Pioneer Park

331. Should Policy ORA01 indicate quantities of development required to ensure effective regeneration of the area?
332. On what basis will proposals for development and technology-based business and innovation centre building; associated education uses; associated research institute and other non-residential community uses be supported by Policy ORA01?

Policy ORA02 – Waterside

- 333. Should Policy ORA02 indicate quantities of development required to ensure effective regeneration of the area?
- 334. Is Policy ORA02 consistent with national policy in terms of creating strong neighbourhood centres or should more flexible employment uses be encouraged?
- 335. Are there any environmental or other site constraints, including flood risk, that will inhibit the development of the allocation as envisaged?

Policy ORA03 – University of Leicester

- 336. Should Policy ORA03 indicate quantities of development required to ensure effective regeneration of the area?
- 337. To deliver effective sustainable development should any areas suitable for purpose built student accommodation be identified within Policy ORA03 and therefore delivered at optimal sites?
- 338. Is Policy ORA03 consistent with national policy in terms of creating strong neighbourhood centres or should more flexible employment uses be encouraged?

Policy ORA04 – Leicester City Football Club

- 339. Should Policy ORA04 indicate quantities of development required to ensure effective regeneration of the area?
- 340. How would Policy ORA04 support proposals for the expansion and enhancement of the King Power Stadium and ancillary development such as hotels and other development at and around sporting stadia?
- 341. Should Policy ORA04 encourage more flexible employment uses in order to develop a strong and cohesive regeneration area?

Policy ORA05 – Walnut Street

- 342. Should Policy ORA05 indicate quantities of development required to ensure effective regeneration of the area?
- 343. How will Policy ORA04 ensure that the area will become better connected to the wider city and have such measures been factored into any viability studies?

MATTER 7 – CLIMATE CHANGE AND FLOOD RISK

Issue 7: Has the Plan been positively prepared and is it justified, effective and consistent with national policy in respect of its policies and proposals for climate change and flood risk in Leicester?

General Questions on Climate Change and Flood Risk

344. Is the Plan consistent with national planning policy relating to the mitigation of, and adaptation to, climate change?
345. How does the submitted Plan support the implementation of the Climate Emergency Strategy and Action Plan and Carbon Neutral Roadmap for the City and its carbon reduction and climate change actions? Should the targets contained in these be set out in the Plan and be monitored for effectiveness?
346. The Energy and Sustainable Design and Construction Study sets out options for preparing Local Plan Policies, how are these reflected in the climate change and energy policies within this chapter?
347. Have the full range of measures required by policies in this chapter been tested, alongside other planning policy costs, to determine how they will impact upon the viability of development? Are the conclusions accurate and robust?
348. Are the Council's climate change policies sufficiently focused on outcomes, and would they be flexible enough to enable site-specific solutions that would deliver effective outcomes in these terms, but which may not include measures advocated by the Plan?

Policy CCFR01 – Sustainable Design and Construction

349. Is the requirement for all new residential development to achieve a minimum 10% and all new non-residential development to achieve a minimum 20% reduction in carbon emissions beyond the requirement of Part L of the Building Regulations in Policy CCFR01 justified?
350. Policy CCFR01 refers to the provision of alternative targets once new National Regulations are adopted. Is this appropriate and justified?
351. Should Policy CCFR01 defer details of the calculation methodology and those uses which are included as exceptions to a separate Supplementary Planning Document?
352. Is the requirement for all new residential development to meet Optional Standard of Part G of the Building Regulations and all new non-domestic development to meet the maximum credits available under BREEAM Wat 01 justified?

353. Should Policy CCFR01 defer details and advice on monitoring, verifying and reporting on energy performance to a separate Supplementary Planning Document?

Policy CCFR02 – Whole Life-Cycle Carbon Emissions

354. Is Policy CCFR02 sufficiently clear and effective in so far as it is apparent how a decision maker should consider development proposals against its criteria?

Policy CCFR03 – Energy Statement

355. Should Policy CCFR03 defer the requirements for an Energy Statement for all major developments to a future Supplementary Planning Document?

Policy CCFR04 – Low Carbon Heating and Cooling

356. Is Policy CCFR04 justified in its requirement for all major developments to connect to existing and planned district heating networks?

Policy CCFR05 – Delivering Renewable and Low Carbon Energy Projects

357. Diagram 5 indicates the buffer zones around residential properties for the purpose of a wind opportunity assessment, however, given the scale of the diagram, the extent of these zones is unclear. Could this be more clearly expressed or should it be included on the Policies Map if reference is made to these buffer zones in Policy CCFR05 as suggested below?

358. Is Policy CCFR05 sufficiently clear and effective in so far as it is apparent how a decision maker should consider development proposals against its criteria?

Policy CCFR06 – Managing Flood Risk and Sustainable Drainage Systems

359. Is Policy CCFR06 justified and effective in respect of its approach to managing flood risk and Sustainable Drainage Systems?

360. Should the Policies Map include the Flood Zones, given that these are referenced in Policy CCFR06?

361. Are the spatial strategy and allocations in the Plan consistent with national planning policy relating to development and flood risk?

362. What is the situation in terms of flood risk across the City and how has this informed the Spatial Strategy and the identification of Main Development Areas and site allocations?

363. Has the Plan sought to minimise the risk of flooding from all sources, including the likely future effects of climate change? Is there a need to safeguard any land for future flood management?

364. Does the Plan promote opportunities to reduce the causes and impacts of flooding, such as making as much use as possible of natural flood management techniques and reducing the conversion of front gardens to parking areas?
365. Is it clear that Policy CCFR06 relates to surface water rather than foul drainage, particularly when the preceding supporting text refers to water quality, including wastewater?

MATTER 8 – HEALTH AND WELLBEING

Issue 8: Has the Plan been positively prepared and is it justified, effective and consistent with national policy in respect of its policies and proposals for health and wellbeing in Leicester?

Policy HW01 – A Healthy and Active City

366. Is Policy HW01 justified given that health and wellbeing are cross-cutting issues that are addressed in many other policies? Is there any evidence to support this stand-alone policy, such as locally identified health and wellbeing needs?
367. Does Policy HW01 serve a clear purpose, avoiding unnecessary duplication of other policies in the Plan, and would it be evident how a decision maker should react to development proposals?

Policy HW02 – Health Impact Assessments

368. Should paragraphs 7.13 and 7.14 be part of the supporting text to Policy HW02, rather than part of Policy HW01 as shown in the Plan?
369. For clarity and effectiveness, should the criteria in paragraph 7.17 for the forms of development that will require a Health Impact Assessment be included in Policy HW02?

MATTER 9 – DELIVERING DESIGN QUALITY

Issue 9: Has the Plan been positively prepared and is it justified, effective and consistent with national policy in respect of its policies and proposals for delivering design quality in Leicester?

Policy DQP01 – Design Principles

370. Is Policy DQP01 consistent with national policy in paragraph 16f) of the NPPF, and does it serve a useful purpose in duplicating the design principles which are contained in the National Design Guide and National Model Design Code?
371. Does the expectation that development will be permitted, 'subject to consideration of' the design principles, amount to a robust and effective policy requirement to ensure new development complies with good design principles?
372. Is Policy DQP01 justified in using the 12 considerations in Building for a Healthy Life as design standards which new development in Leicester City is expected to meet, rather than as an assessment framework and design tool to inform the design process?
373. Paragraph 8.7 of the Plan refers to the intention to publish supplementary planning documents (SPDs) to expand on the Design policies, including on Urban Design, Tall Development and Character Areas. Are these likely to introduce new policy requirements, which should be incorporated in the Plan and made subject to independent Examination?

Policy DQP02 – Tall Development

374. Is Policy DQP02 effective in guiding tall development to the right locations within the City, without defining tall building zones on the Policies Map?
375. For clarity and effectiveness, should the definitions for tall development by reference to building heights in different parts of the City be included within Policy DQP02, rather than the supporting text?
376. Should criterion e), which requires proposals to provide an assessment of the design considerations in the policy, be moved to the end of Policy DQP02 for clarity and effectiveness?

Policy DQP03 – Inclusive Design

377. Is Policy DQP03 clearly written and unambiguous, so that it would be evident how a decision maker should react to a development proposal, and what standards of inclusive design are required to be met?

Policy DQP04 – Landscape Design

378. Is Policy DQP04 consistent with national policy in the following respects:

- (i). The requirement in criterion c) to only give consideration to the protection of irreplaceable habitats, such as ancient woodlands and veteran trees, when paragraph 180 c) of the NPPF expects that development resulting in the loss or deterioration of such irreplaceable habitats should be refused?
- (ii). The absence of a requirement to ensure that new streets are tree-lined when paragraph 131 of the NPPF expects planning policies to include this?

379. For clarity and effectiveness, should criterion g), which requires proposals to provide a landscape design statement to evidence commitment to high quality landscape proposals, be moved to the end of Policy DQP04 so that it applies to all of the criteria in the policy?

Policy DQP05 – Backland, Tandem and Infill Development

380. For clarity and effectiveness, should 'Infill development' be deleted from the title of Policy DQP05, given that the policy does not mention infill development?

Policy DQP06 – Residential Amenity

381. Is the wording of Policy DQP906 sufficiently clear and robust, and would it be effective in ensuring a high standard of residential amenity for existing and future occupiers, when it only requires a series of factors to be taken into account, rather than stipulating that proposals should not cause unacceptable harm to the living conditions of surrounding residents?

382. For clarity, should the supporting text in paragraph 8.26 of the Plan, dealing with Residential Amenity and New Development be moved to precede Policy DQP06?

Policy DQP07 – Recycling and Refuse Storage

No questions on Policy DQP07.

Policy DQP08 – Shopfronts and Security

No questions on Policy DQP08.

Policy DQP09 – Signs and Banners Advertisement Design and Location

383. To ensure that Policy DQP09 is clearly written and unambiguous, should criteria a) to d) be positively worded, with regard to the potential impacts on visual amenity, light pollution and highway safety?

384. Are paragraphs 8.34 to 8.42 intended to be supporting text to Policy DQP09 or should they be incorporated into a policy or policies for other forms of advertisement?

Policy DQP10 – Advertisement Hoardings

No questions on Policy DQP11.

Policy DQP11 – Changing Places Facilities

385. To ensure that Policy DQP11 is justified, should the wording be modified to make clear that it relates to proposals for new development?

MATTER 10 - HERITAGE

Issue 10: Has the Plan been positively prepared and is it justified, effective and consistent with national policy in respect of its policies and proposals for heritage in Leicester?

386. Should Policies HE01 and HE02 be combined into a single policy as they both relate to the Historic Environment?
387. Should Policies HE01 and HE02 address the consideration of harm in respect of public benefit in order to be consistent with national policy?
388. Should the supporting text to Policy HE02 refer to the need for Scheduled Monument Consent for the avoidance of doubt and outline that in some cases substantive investigations may be required ahead of submitting an application?
389. Diagram 9 indicates the location of the City's heritage assets. Should these be shown on the Policies Map for clarity?
390. Policy HE02 refers to the 'Archaeological Alert Area' - although this is shown on Diagram 9, should the geographical extent of this area be included on the Policies Map?

MATTER 11 – CULTURE AND TOURISM

Issue 11: Has the Plan been positively prepared and is it justified, effective and consistent with national policy in respect of its policies and proposals for culture and tourism in Leicester?

General Questions on Culture and Tourism

391. Is the Plan consistent with national policy in paragraphs 93 and 99 of the NPPF in respect of:
- (a) guarding against the unnecessary loss of existing leisure and cultural facilities? and
 - (b) ensuring an integrated approach to considering the location of housing and cultural and leisure services?
392. For the Plan to be clear and effective, should Chapter 11 include a statement on what leisure needs and facilities are required within the Plan area?

Policy CT01 – Culture, Leisure and Tourism

393. Is it clear what is meant by 'enhancing the local culture of the area' in criterion e) of Policy CT01, and would it be evident how a decision maker should judge proposals for cultural, leisure and tourism facilities against this requirement?

Policy CT02 – Assets of Community Value

394. Does Policy CT02 serve a clear purpose in relation to proposals for development? Would it be evident to decision makers how the policy should be applied in determining applications for planning permission?

Policy CT03 – Protection of Public Houses (Class Sui Generis)

395. Would Policy CT03 be effective in enabling the protection of public houses in order to enhance the sustainability of communities and residential environments?
396. To be effective should applications fulfil the requirements of criteria 'a' and criteria 'b' in Policy CT03, rather than one or the other?

Policy CT04 – Great Central Railway Museum

397. Is Policy CT04 sufficiently robust and clear about what is expected from development at Red Hill Roundabout, particularly in terms of the type and scale of associated facilities for the proposed museum and park and ride, given the ecological and strategic importance of the site as part of a Site of Importance for Nature Conservation and a green wedge, and its location within the setting of the nearby Grade II listed Mobil garage, and adjacent to the Belgrave allotments? Should the policy set specific standards and mitigation measures in respect of these constraints to

ensure effectiveness, such as those set out for developments in the Central Development Area?

398. Is the boundary of the site relating to Policy CT04, as shown on the Policies Map, justified in including part of the adjacent Belgrave allotments site?
399. Is the last sentence of Policy CT04 clear and unambiguous regarding the type and scale of renewable energy proposals that would be permitted on the site?

Policy CT05 – Provision of new and retention of existing Places of Worship

400. Is it clear what is meant in criterion a) of Policy CT05 by the 'appropriateness of the location in terms of meeting a local need' and is it evident how a decision maker would apply this principle to a proposal for a new place of worship?
401. How does Policy CT05 plan positively for the retention/unnecessary loss of existing places of worship?

Burial Space

402. Paragraph 11.19 of the Plan refers to the requirement for a new burial site between 2025-2030 to address the need for burial space in the city. Whilst paragraph 11.20 recognises burial space and appropriately designed facilities would be acceptable within green wedges and open spaces, no sites have been allocated in the Plan for the development of a new facility. In order to be positively prepared, should the Plan be allocating a site for new burial ground?

MATTER 12 – OPEN SPACE, SPORTS AND RECREATION

Issue 12: Has the Plan been positively prepared and is it justified, effective and consistent with national policy in respect of its policies and proposals for open space, sports and recreation in Leicester?

General Questions on Open Space, Sports and Recreation

403. Are the policies in this chapter on Open Space, Sports and Recreation justified by adequate, proportionate and up to date evidence?
404. Should reference be made in the introductory section of this chapter to the Local Nature Recovery Strategy and the requirements under the NERC Act as brought by the Environment Act 2021?
405. Does Diagram 17: Open Space Network, Leicester Urban Area provide a clear and effective representation of the Green Wedges, Open Spaces and rivers/canals within Leicester?
406. Diagram 17 includes details of Green Wedges and open spaces which lie outside Leicester's administrative boundary. Is this approach justified?
407. How would development proposals which would generate additional demand for sports and recreation facilities, particularly in an area of deficiency be assessed? Would development be expected to provide new facilities or contribute to the improvement of existing facilities either on or off-site?
408. Where development generates the need for new open space, sports or recreation facilities how would the Council secure this? Where is the approach which the Council would take set out?

Policy OSSR01 – Green Wedges

409. In order to be effective, should Policy OSSR01 include a criterion requiring an ecological survey to be submitted alongside any planning application for development in the Green Wedge?
410. Should the supporting text to Policy OSSR01 include reference to the wider benefits which transport connections within the Green Wedges can secure to be consistent with national policy?
411. In order to be effective, should Policy OSSR01 include a criterion which would permit development proposals within the Green Wedge where they would deliver essential infrastructure, subject to appropriate mitigation being provided?
412. Is the extent of the Green Wedges justified and effective?
413. Should reference in the supporting text to Policy OSSR01 to the Green Wedge 'allocations' be amended to 'designations' for clarity and effectiveness?

Policy OSSR02 – Development of Open Spaces

- 414. Does Policy OSS02 only apply to open spaces defined on the Policies Map? Is there sufficient and clear visual illustration of the different types of open space to ensure the policy is effective?
- 415. The supporting text to Policy OSSR02 refers to the Council seeking to protect other open spaces not shown on the Policies Map and assisting any development proposals on a case-by-case basis. Should Policy OSSR02 set out the criteria against which such proposals should be considered?
- 416. Is Policy OSS02 justified by up-to-date evidence, particularly when taking into account the change in how communities use open space post the COVID-19 pandemic and climate change?
- 417. Is Policy OSS02 sufficiently clear to provide clarity to developers about what is surplus or not needed open space?
- 418. Should criteria 'f' of Policy OSS02 also include the delivery of flood alleviation?

Policy OSSR03 – Open Space in New Development

- 419. Is Policy OSS03 justified and consistent with national policy and will it be effective in ensuring access to high quality open spaces and opportunities for sport and physical activity?
- 420. Is Policy OSS03 sufficiently clear on what is required in terms of open space provision in new development? How would a developer know if there are local deficiencies? If new guidance is to be adopted what are the timescales for its publication?
- 421. Should Policy OSS03 promote linkages with other policies in the Plan such as those addressing strategic allocations and cross boundary developments?

Policy OSSR04 – Existing Playing Pitches

- 422. Is Policy OSS4 effective and justified by up-to-date evidence, and is it consistent with the NPPF?
- 423. Should buildings and associated development ancillary to outdoor sports facilities be included in Policy OSS04?

Policy OSSR05 – Playing Pitches and Associated Facilities

- 424. Does the term 'well accessed' in criterion a) of Policy OSS05 need further clarification?

Policy OSSR06 – Built Sports Facilities

- 425. Is there a need for built sports facilities in Leicester within the Plan period? If so, what is the extent of this need?

426. How would Policy OSSR06 ensure that the provision of new, or the enhancement of existing, built sports facilities would come forward as and when required?

Policy OSSR07 – Waterways

427. Is Policy OSS07 clearly written such that it will provide an effective strategic framework to inform the preparation and determination of planning applications?

MATTER 13 – NATURAL ENVIRONMENT

Issue 13: Has the Plan been positively prepared and is it justified, effective and consistent with national policy in respect of its policies and proposals for the natural environment in Leicester?

Policy NE01 - Protecting designated sites, legally protected and priority species, and priority habitats

428. Is Policy NE01 consistent with national policy and will it be effective in protecting and enhancing geodiversity? In particular, does the policy explicitly consider development proposals affecting the full hierarchy of international, national and locally designated geological sites? To be effective should the policy refer to geodiversity alongside biodiversity?
429. Is Policy NE01 clearly written, such that it will provide an effective strategic framework to inform the preparation and determination of planning applications, with particular regard to a mitigation hierarchy?

Policy NE02 - Biodiversity Gain.

430. Is it appropriate and justified by evidence for Policy NE02 to require an 'at least' 10% increase in biodiversity? Is there evidence to support a higher BNG percentage requirement, in order to provide a positive approach consistent with achieving the plan's vision and sustainable development?

Policy NE03 - Green and Blue Infrastructure

431. Overall, is Policy NE03 justified, effective and consistent with national policy, in chapters 8 (Promoting healthy and safe communities), 14 (Meeting the challenge of climate change, flooding and coastal change) and 15 (Conserving and enhancing the natural environment) of the NPPF? In particular, would this policy ensure coherent ecological networks that are more resilient to current and future pressures?
432. Is Policy NE03 clearly written such that it will provide an effective framework to inform the preparation and determination of planning applications?

Policy NE04 - Ancient Woodland, Veteran Trees and Irreplaceable Habitats

433. Does Policy NE04 provide an effective basis to protect woodlands and trees? In particular, should the policy also refer to the deterioration of habitat, rather than just loss or harm?

MATTER 14 – TRANSPORTATION

Issue 14: Has the Plan been positively prepared and is it justified, effective and consistent with national policy in respect of its policies and proposals for transport in Leicester?

General Questions on Transportation

434. A number of the transport policies refer to published guidance in other documents which do not form part of the submitted Plan and are not before the Examination for consideration. How should this matter be addressed to ensure that the policies are justified and will be effective?
435. What is the likely effect of the proposed scale and distribution of development on the strategic and local highway network and key junctions? Have the necessary improvements and/or mitigation measures to the strategic and local highway network been identified in the Plan, including costs and timing/phasing where necessary?
436. In strategic terms, what transport issues have been identified that would require mitigation to enable the scale of planned growth to be realised?
437. Does the Plan include policies which adequately manage the delivery of development so that severe transport impacts do not arise?
438. To achieve the objectives of the Plan, do private motorised vehicles need to be restricted or their use controlled through policies within the Local Plan?

Policy T01 – Sustainable Transport Network

439. Have the Plan's transport impacts been considered on a cross-boundary basis, including the role of active and sustainable travel modes?
440. Is it clear what is meant by the term 'suitable location' in second sentence of Policy T01, in the context the policy as a whole?
441. How will criteria a) to j) of Policy T01 deliver the re-balancing of transport modes? Where will the investment come from and when?
442. Should the Public Right of Way Network and the role it plays in sustainable travel be addressed within Policy T01?

Policy T02 – Climate Change and Air Quality

443. Will Policy T02 facilitate a reduction in the need to travel and support alternatives to the use of private motorised transport including walking, cycling and public transport?
444. How is Policy T02 linked to any monitoring requirements and does it include flexibility to respond to any changes to national air quality targets?

Policy T03 – Accessibility and Development

445. Is Policy T03 intended to be applied to all development, regardless of scale and type? If not, is this clear?
446. Should Policy T03 include any reference to the Public Right of Way Network and any Rights of Way Improvement Plans?

Policy T04 – Park and Ride

447. The supporting evidence base refers to particular sites/areas of the city where new Park and Ride facilities would be necessary. Should Policy T04 be more specific in referring to these capacity gaps and routing requirements?

Policy T05 – Freight

448. How does Policy T05 link to Policy T01 and its ambition to deliver sustainable transport networks? Are there any specific opportunities to link commercial vehicles depots / integrated transport facilities within the strategic growth areas?

Policy T06 – Highways Infrastructure

449. Has the package of transport infrastructure schemes identified to address demand on the transport networks been modelled to demonstrate if they would achieve their intended outcomes?
450. Does there need to be any assessment at the time of submission of relevant planning applications to determine how much development may proceed in advance of the Local Plan highway interventions being in place? If so, does this need to be made clear in any relevant Plan policies?
451. To achieve the Local Plan's sustainable development objectives, do any highway infrastructure measures need to be delivered in terms of the transport hierarchy and sustainable transport modes and does this need to be specified in the policy?
452. For each identified transport infrastructure scheme, can the Council clarify whether it would need planning permission, how it would be funded, and over what timescale it would be delivered? What would happen if one or more the identified transport infrastructure schemes did not progress as planned?

Policy T07 – Car Parking

453. Is reference to EV charging points for residential and commercial development in criterion c) of Policy T07 necessary, given the changes to the Building Regulations in June 2022?
454. Should criterion b) of Policy T07 also address the design and surface materials of car parking areas to minimise surface water run-off and ensure sustainable drainage systems?

MATTER 15 – MINERALS AND WASTE NEEDS

Issue 15: Has the Plan been positively prepared and is it justified, effective and consistent with national policy in respect of its policies and proposals for minerals and waste needs in Leicester?

General Questions on Minerals and Waste Needs

455. Should mention be made of dealing with wastewater from new developments? In particular, who is intended to secure, or provide, further investment in wastewater treatment?
456. To ensure consistency between the Plan's policies should any design criteria for new development incorporate storage space for waste and investigate the opportunities for processing of waste on site?
457. Given the role of the Environment Agency in permitting new waste sites, for clarity, should there be mention of this role within the supporting text to this chapter?
458. Where specific sites have been identified, how does the evidence demonstrate that the allocations are appropriate to meet identified requirements?
459. Is the supporting text at paragraphs 17.9-17.10 consistent with the approach set out in national policy, particularly relating to facilitating the sustainable use of minerals?
460. For clarity, should the Plan clearly set out that Mineral Safeguarding Areas (MSAs) are areas of known mineral resource that are of sufficient economic or conservation value to warrant protection for generations to come?

Policy FMWN01 - New Waste and Existing Waste Uses

461. Is the first part of Policy FMWN01, concerning applications for new and extensions to existing facilities, justified, effective and consistent with national policy, particularly in terms of biodiversity and conservation?
462. How would Policy FMWN01 drive waste management up the waste hierarchy?

Policy FMWN02 - End of Life Vehicle Facilities

463. How would Policy FMWN02 drive waste management up the waste hierarchy and promote the circular economy?

Policy FMWN03 - Managing Leicester's Minerals Resources

464. Are issues of mineral extraction within the scope of the Plan and would the criteria form an effective basis for determining planning applications?
465. Does Policy FMWN03 provide a positive approach/framework to bring forward necessary mineral resources?

Policy FMWN04 - Provision of New Aggregate Recycling Facilities

466. How does the Plan influence non-minerals development with a view to minimising the reliance on primary aggregates, such as the adoption of sustainable design principles, construction methods and procurement policies and reusing or facilitating the recycling of wastes generated on-site and using alternative construction materials?
467. Does the Plan provide sufficient guidance to applicants as to how compliance with Policy FMWN04 is expected to be achieved?
468. How will the effectiveness of this policy be monitored?

MATTER 16 – DEVELOPMENT AND INFRASTRUCTURE

Issue 16: Has the Plan been positively prepared and is it justified, effective and consistent with national policy in respect of its policies and proposals for infrastructure in Leicester?

Policy DI01 - Developer Contributions and Infrastructure

469. Does Policy DI01 satisfy paragraph 34 of the NPPF, which states that plans should set out the contributions that are expected from development, including infrastructure for, amongst other things, education, health and transport?
470. What is the timescale for the production of the 'developer contributions and infrastructure supplementary planning document' (SPD) and what will it cover, bearing in mind that the Planning Practice Guidance⁹ states that it is not appropriate to set out new formulaic approaches to planning obligations in SPDs or supporting evidence base documents, as these would not be subject to examination? To be effective does this SPD need to be mentioned within the policy?
471. The Whole Plan Viability Assessment (May 2022) [EB/DI/3] states, in paragraph 12.100, that, on the whole, the Council is not securing developer contributions. Where is the evidence to show that Policy DI01 would be effective in delivering contributions, particularly on brownfield sites?
472. In considering viability in decision making, is Policy DI01 clear and unambiguous on the guidance being referred to and the circumstances in which development contributions may be varied?
473. Within the updated Infrastructure Assessment 2023 [EB/DI/2], it is stated that a number of the infrastructure requirements would be funded by the Local Authority. What evidence is there to demonstrate that the necessary funding would be available over the Plan period?
474. What evidence is there to demonstrate that the necessary infrastructure requirements can be delivered over the Plan period?
475. Are there any inter-dependencies between infrastructure schemes and the delivery of development allocated in the Plan? If so, is further clarification required in the relevant policies, such as development thresholds triggering a need for specific infrastructure?

⁹ PPG Paragraph: 004 Reference ID: 23b-004-20190901

MATTER 17 – NEIGHBOURHOOD PLANNING

Issue 17: Has the Plan been positively prepared and is it justified, effective and consistent with national policy in respect of its policies and proposals for neighbourhood planning in Leicester?

476. Does the Plan set an appropriate strategic framework for neighbourhood plans in the City area? Would the Plan's non-strategic policies allow scope for neighbourhood plans to play a positive role in the future planning and development of Leicester, having regard to current progress in their preparation and national policy?

MATTER 18 – PLANNING ENFORCEMENT

Issue 18: Has the Plan been positively prepared and is it justified, effective and consistent with national policy in respect of its policies and proposals for planning enforcement in Leicester?

477. Is Policy PE01 justified for the sustainable development of the area? What evidence is there that this approach is appropriate to Leicester?

MATTER 19 – MONITORING

Issue 19: Is the monitoring framework of the Plan effective and consistent with national policy?

478. Does the Plan have an adequate framework for monitoring, so that the extent to which its policies are being delivered and the need for Local Plan review will be clear?

479. To measure the effectiveness of its policies, should the Plan include monitoring indicators and targets for the vision and objectives and for each of its policies?

480. Paragraphs 21.4 and 21.5 of the Plan refer to the intention to publish supplementary planning documents to set out development requirements or technical guidance on issues such as parking standards, climate change, developer contributions, tall buildings and character areas in the CDA. Are these likely to introduce new policy requirements, which should be incorporated in the Plan and made subject to independent Examination?