

## **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?**

The council has been working for many years with landowners and promoters regarding schemes to ensure that empty buildings are reused in the city centre e.g. through updating the SHELAA and pre-application discussions. In addition, the reuse of empty buildings is being actively (and successfully) addressed through prior approval schemes which have been determined for uses such as office to residential development.

The character area assessments, however, do not provide any specific steer around the re-use of empty buildings, and approach which is being actively pursued using development management and other tools at the disposal of the Council.

- (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?**

The policies contained within the CDA prioritise residential development, but also provide opportunity for retail, employment, sports, leisure, and other relevant uses, all of which look to improve viability and vitality of the central development area.

The council is also of the opinion that other policies within the plan, in particular those within the retail chapter, provide clear policy direction on this matter. This includes TCR03 'City Centre' and TCRO4 'Central Shopping Core (Primary Shopping Area)'. The Council's aims and objectives for this part of the city need

to be read as a whole.

## **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?**

The Council sees housing delivery and to maximise development on brownfield land as far as possible as top priorities for the city. The council is also keen to ensure city centre regeneration, and the local plan will provide the mechanism for these sites to come forward.

The council also has a very good track record of delivery within the CDA including positive and proactive intervention on site. The council has facilitated the delivery of over 3000 new dwellings in the last 5 years within this area.

The council has an established track record of using compulsory purchase orders and land transfer to assemble land for development and will continue to do this during the plan period.

Patterns of land ownership in the CDA are typically fragmented. This can pose challenges for delivery as the scale of sites means co-ordination of multiple landowners may be necessary to achieve an acceptable comprehensive scheme. The Council has a successful track record of positive intervention to stimulate delivery. This has ranged from investment in infrastructure to unlock site delivery, to site assembly both by negotiated agreement and use of statutory land assembly powers. This has been most evident within the waterside area, specifically the keepmoat-waterside scheme where the council made significant use of CPO powers to deliver a large city centre housing scheme.

Investment appetite for residential schemes is good with both local relatively small-scale investors supporting delivery of smaller projects, through to institutional investors seeking build-to-rent schemes, typically of 300-units-plus. Longharbour, Cording and Deutsche Finance International are recent examples in this sector. The Council's focus is likely to be working with landowners in specific targeted areas of the CDA on a rolling-programme to create the right conditions for investment and delivery. This will be done through master planning, brokering and site infrastructure support as we have done in the past.

### **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?**

In addition to the supporting evidence for the CDA, the council commissioned an independent study to 'sense check' the capacity work around the CDA. This work, carried out by Planet IE (reference EB/CD/10) showed that, based upon conservative assumptions, the city could readily accommodate around 6,500 homes. Since then, a number of sites have been delivered which has lowered the number to 6,286. This evidence along with the updated SHELAA show there are enough sites within the CDA to deliver this number. Regarding the matter of delivery, the sites are predominantly within private ownership and therefore instead of being overly prescriptive around what sites are coming forward when, the council is using a yearly delivery figure in the plan based on past delivery.

The Council therefore expects that around 449 homes could be comparatively easily delivered per year in the CDA within the Plan Period. Notably, this is below the delivery rates for the previous 5 years. However, this figure has been used to manage fluctuations in delivery as a median. This is explained in further detail in the 'Housing and Sites Topic Paper' (TP/5).

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?**

Whilst the council acknowledges the important role that student development has within the CDA and the wider central city area, providing a specific figure for the CDA is difficult due to the fact that student numbers for the Universities and other higher education providers within the city are commercially sensitive and not available in enough detail for the council to use adequately. The council therefore prefers to adopt a flexible approach to these numbers which would allow the council to determine applications on a 'case by case' basis.

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?**

The viability report (EB/DI/3) shows that within the CDA viability is challenging. However, residential development in particular has nonetheless continued at significant pace, with on average 628 dwellings per year being delivered within the CDA over the past 5 years. As mentioned above, it is clear therefore that the private sector will have a significant role in site delivery within this area. As proven by actual delivery – the mechanisms adopted by the private sector to secure actual delivery appear to be working adequately.

The council is also working with government delivery agencies such as Homes England to unlock difficult to develop sites where there are multiple land owners, or the poor viability means that delivery will be difficult.

The Waterside area is one example of coordinated delivery of regeneration the Council expects to repeat in other areas of the CDA. Within this area, the Council has provided clear area-specific planning guidance. This has supported investment in public realm/highway infrastructure, and using statutory powers where necessary, assisted in land assembly and subsequent remediation of land to unlock development. All these tools are expected to be available for further targeted interventions in the CDA.

**268. In what way will the CDA address the Council's priority of addressing the acute affordable housing need within the City?**

The CDA will be expected to provide a wide range of housing types in line with the Housing Mix Policy (HO03). However, stated above, viability within the CDA is challenging. The viability assessment states that on brownfield land, development is unable to sustain any meaningful amounts of affordable housing within the city.

The viability assessment shows however greenfield sites including those within the CDA can deliver meaningful amounts of affordable housing.

Despite this, the Council will actively support delivery of affordable housing wherever possible given the accessibility of this part of its area. As values increase, its approach to affordable housing in the CDA will be reviewed as part of its plan review.

**269. What is the timescale for the production of the supplementary planning documents (SPDs) for the character areas and what**

## **will they cover?**

The SPD's will primarily focus on implementation, bringing together the policies and the proposals set out in the Character Area Evidence Documents and providing clarification on expectations regarding delivery. This will include deliverables, outputs and design quality requirements specific to each character area, potentially in the form of design codes. The council have set out what a potential SPD would contain as well as a timescales for their production in Appendix 1 of this statement. The council will commence consultation on the draft SPDs on adoption of the plan, with consultation and adoption of these within around 6 months thereafter.

### **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?**

Whilst the council considers that the supporting text is clear, they would consider a modification to the policy wording to address the matter of agent of change within the policy itself.

**271. Is Policy CDA02 consistent with national policy and the statutory duty in respect of heritage assets?**

The council believes that this policy is consistent with national policy and the statutory duty in respect of heritage assets. However the council would consider modification(s) to address this issue.

**272. Would Policy CDA02 be clear and effective in respect of its reliance on further details being provided by subsequent SPDs?**

As explained in the answer to Question 269, the Council feels that the contents of the subsequent SPD's (See Appendix 1 example) will provide details on future implementation and what and how new developments will need to provide to meet the requirements of the policy.

**273. Are the Character Areas clearly defined on the Policies Map? Should they include the relevant policy number?**

The council would be willing to consider amending the policies map with the relevant policy number for each of the character areas if this would provide useful clarification.

### **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?**

The above application 20231214, was for permission for the demolition of 48a London Road, Parcel Yard which will be needed to facilitate the redevelopment of Leicester Railway Station. Permission was granted on 31.10.23 and works have commenced on site.

An application was submitted for the redevelopment (20240594) in April 2024 and it is currently being considered with a target date for determination by Autumn 2024.

275. **Would Policy CHA01 be sufficiently clear and effective in order to deliver the high-quality office development sought within this area?**

The council is of the opinion that the policy gives adequate steer around what high-quality offices are required and where that type of development would be acceptable. Any proposed development would need to consider and take into account the design policies within the plan.

276. **What is meant by the term 'high-quality'?**

The Council would be willing to provide further detail in the glossary. The National Design Guide (NDG) and the National Model Design Code and Guidance Note illustrate how beautiful, enduring and well-designed places can be achieved in practice, supported by tools outlined in the NPPF such as Building for a Healthy Life. These documents provide the main framework for assessing how development is contributing to high quality buildings and places.

Policies DQP01 and DQP02 are also primarily based on these national policy documents.

High quality is clearly cutting across policies as can be seen in the 10 objectives of the NDG which includes nature, movement and resources.

**277. Is it clear how the aims of this policy would be met?**

The council feels the policy is comprehensive and provides clear reasoning on how the objectives for the area will be met.

The Character Area SPDs will offer further clarification and provide any specific requirements, supported by the above documents and policies, where it is not covered elsewhere.

**278. Would the development, as envisaged by Policy CHA01, be viable?**

Development of high-quality office space at the station is not anticipated to be viable. Early phases in particular will require public intervention to secure delivery. The Council has experience and a track record of delivery of office development. Every new office scheme in the city for the last 20-years has been underpinned by public support in some form. Recent interventions have included direct delivery (Friars Mill, Dock etc.), land control, enabling works (Mattioli Woods, Northgate Street offices) and sharing investment risk through mechanisms like lease put-options (1 Great Central Square).

The Council is actively progressing discussions with Network Rail in pursuit of a collective development agreement for the site. Discussions are continuing with Homes England around the potential gap-funding support. The Council considers that the strategic case for delivery of high-quality office space here is very strong. The outcomes for the future prosperity and wellbeing of the City are compelling and the project will be prioritised for any appropriate future funding opportunities. There is an expectation that adequate funding will be available during the plan period to deliver this scheme.

**279. Is the use of The Railway Station Character Area for office development appropriate and compatible with neighbouring uses?**

Previous use the use of this land was a former sorting office and station car parking, as well as the train station itself. In view of this it's the council's opinion that new office development would be compatible with neighboring uses. Matters regarding issues such as noise and other disturbances will be dealt with through the development management process when an application is submitted.

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?**

The council acknowledges this matter and would be willing to consider an appropriate modification and supporting text to address this.

### **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?**

It’s the council’s opinion the policy is clear and effective to deliver this objective. Further guidance will be set out within the future SPD for this area.

282. **What is meant by the term ‘high-quality’?**

See question 276

283. **Is it clear how the aims of this policy would be met?**

See answer to question 277

284. **Would the development, as envisaged by Policy CHA02, be viable?**

The council doesn’t expect these sites to come forward straight away – the area will not be weighed down by additional policy requirements to avoid constraining delivery. The council notes the difficulty of delivery in the area but there is significant developer interest (see previous answers to questions). Discussions are ongoing with landowners and the council is confident there will be delivery within the plan period.

285. **Should the policy specify the number of dwellings expected to be provided within this character area?**

The council is of the opinion that the CDA should have a single figure for residential development given the complexity of land ownership with the CDA area. In view of this, the council considers it more appropriate to provide an overall number for the CDA rather than character area by character area basis. A greater degree of granularity would provide spurious precision to such an exercise, and might give rise to an unintended



disincentive. For example, if delivery in one character area is progressing well, then a delivery figure might then be (wrongly) viewed as a constraint to further development.

**286. Is the support for other uses including retail and business uses appropriate?**

The Mansfield Street Character Area includes shopping streets that are popular and well used, for example Church Gate, and retaining this use is important for the area and the city centre as a whole. There are existing business uses in the area which are also supported. This mix of uses has not prevented residential development coming forward, and residential led planning applications, and the different uses are well established in the area.

**287. Should the amount of new business uses anticipated within this character area be included within the policy?**

The council would expect this to be led by market forces rather than direct policy intervention through the local plan.

**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?**

It's the council's opinion that the policy currently provides adequate framework for these matters but the future SPDs (see appendix 1 for the expected structure of these SPD) will provide further guidance around delivery of these objectives. In addition to this, the CDA policies should be read alongside other policies within the local plan which cover these matters such as walking, cycling and public realm.

**Policy CHA03 – St Margaret's**

**289. Would Policy CHA03 'St Margaret's' be effective in guiding the preparation of a Masterplan for this area?**

Further detail will be provided in the subsequent SPD which will be effective in guiding a masterplan for this area. See appendix 1 for the expected structure of the SPDs.

290. **Is it clear how the aims of this policy would be met?**

See Response to Question 277

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?**

See response to the Question 285.

292. **Would the development, as envisaged by Policy CHA03, be viable?**

The council acknowledges that development within the CDA is difficult from a viability point of view. However, as mentioned in other responses to other questions, the council has a good track record of delivery even in light of challenges. By way of example, the Council has received a planning application, following pre-application negotiations, for the Corah Factory site (20220709) which is currently under consideration and within this area. The application is residential led (up to 1,100 dwellings) with a small amount of commercial uses (and other elements) and is proposing to improve connections and re-use of some heritage assets as outlined in the policy.

293. **Should the policy refer to the use of sustainable drainage?**

No – the council considers it is properly covered by other policies elsewhere, in particular Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS).

#### **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?**

It's the council's opinion the policy is clear and effective to deliver this objective.

295. **Is it clear how the aims of this policy would be met?**

See Response to Question 277

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?**

In regard to residential development see answer to question 285 however the council would expect the market to lead on provision of future 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?**

Supporting new retail (Class E(a)) within the central shopping area. Ancillary food and drink uses (Class E (b)) will be supported in the Wharf Street character area subject to the consideration of a sequential assessment.

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?**

Further guidance will be given within the future SPD for the area. See appendix 1 for more details of the expected content of the future SPDs.

299. **Would the development, as envisaged by Policy CHA04, be viable?**

The council acknowledges that development within the CDA is difficult from a viability point of view. However, as mentioned in responses to other questions, the council has a good track record of delivery even in light of challenges within the central development area.

300. **Should the policy refer to the use of sustainable drainage?**

See answer to Question 292

**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?**

Yes, it's the council's opinion the policy is clear and effective to deliver this objective.

302. **Is it clear how the aims of this policy would be met?**

See Response to Question 277

303. **Would the development, as envisaged by Policy CHA05, be viable?**

The council acknowledges that development within the CDA is difficult from a viability point of view however as mentioned in other responses to other questions, the council has a good track record of delivery even in light of challenges within the central development area.

304. **Should the policy specify the number of dwellings expected to be provided within this character area?**

See answer to Question 285

305. **What are the expansion needs of Leicester College and how will this be accommodated within the Character Area?**

The land ownership of Leicester College, at its Abbey Park campus, has always been known to the Council and therefore has not been identified for other uses, including residential. As a significant amount of this land is not built on and is available for new development, this provides an opportunity for expansion. Indeed the Council has recently approved a new 400+ sq m Aeronautical / Advanced Engineering Training Facility with associated landscaping and improved pedestrian and cycle connections on this land. There remains much more land available with further development possible in the future. Notwithstanding this, if other land became available in the character area then further educational uses would not be resisted.

**306. How would the policy support and enhance the existing employment uses within the northern area of Belgrave Gateway?**

The wording would allow applications for new employment uses to be permitted and for existing employment uses to expand. The Employment Development Needs Assessment (2020) confirms this area is C grade, of moderate quality; a busy industrial area with a mix of pre and post war buildings; has reasonable access and prominence off key route into City Centre; and provides a good mix of small business accommodation which appears well used.

**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?**

Annex 2: Glossary of the NPPF identifies "hotels and conference facilities" as a main town centre use. Paragraph 87 of the NPPF requires local planning authorities to apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. The sequentially preferred location for hotel uses would be the city centre, but specific needs will be considered.

Part of Belgrave Gateway character area is within the city centre allocation, other parts are not. Therefore, depending on the location of a proposed hotel within this character area there may or may not be need for a sequential assessment to be undertaken as part of a planning application. The council believes this approach to be in accordance 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?**

The policy doesn't exclude the development of different housing types.

**309. Should Policy CHA06 specify the number of dwellings expected to be provided within this character area?**

See answer to Question 285.

**310. How would Policy CHA06 support development directly related to the Leicester Royal Infirmary, De Montfort University and Welford Road Stadium?**

The policy and character area evidence document promotes close working with all three partners, and this will continue in the development of a subsequent SPD which will provide more detail, mindful of the future development needs of all three. In particular, the policy recognises that development will be required and generally supported. However, the positive integration and interface with the wider area is a specific area for improvement. The Council has, in the last couple of years, approved two new facilities for the Leicester Royal Infirmary, a new hotel and associated public realm works at 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?**

The council has an adopted Article 4 Direction relating to the change of use of Class C3 dwelling houses to Class C4 Houses of Multiple Occupation. Much of the Leicester Royal Infirmary & De Montfort University character area is covered by this article 4 direction. The direction removes the permitted development right to change the use of Class C3 dwellings to Class C4 houses of multiple occupation in those areas where it is applied. Since the introduction of the article 4 direction in 2014, further proliferation of HMOs in those areas has ceased. This has helped to ensure that the residential amenity and wellbeing of communities are protected through retaining houses in Class C3 use, controlling HMO concentrations, and allowing for a greater dispersal of HMO uses across the city, thus diluting the harmful impacts they may have when concentrated.

**312. Does Policy CHA06 provide clear and effective guidance on constraints and suitable mitigation in terms of the historic environment?**

The character assessment evidence document for this area (ref

EB/CD/2) provides details on the heritage and townscape assets and considerations regarding key views and setting. These considerations will be expanded upon in a subsequent SPD. However, compared to other character areas, this character area is one of the least constrained with respect to the historic environment. The subsequent SPD will be consistent with Historic Environment policies.

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?**

The evidence document (ref EB/CD/2) details nearby public transport and walking distances to main transport hubs such as bus stations and the railway station. The buildings and facilities are well connected. It also details the pedestrian and cycle network, including the extensive Connecting Leicester improvements that have been delivered locally that connect to networks across the city. Around £100m has been spent on improving connectivity within the CDA and making the area more attractive. This has been funded predominantly by central government and the relevant funding from the council itself. Connections to these destinations are wider than the objectives of this character area.

### **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?**

The evidence document (ref EB/CD/7) provides details on the heritage and townscape assets and considerations regarding key views and setting. These considerations will be expanded upon in a subsequent SPD. The subsequent SPD will be consistent with Historic Environment policies.

315. **How will Policy CHA07 provide a platform to create a cohesive character area given the strong contrast between the west and east areas?**

This has been considered in detail. The evidence document details how this could be achieved by ensuring the scale, urban grain, built form and appearance of new development in the east area takes cues from the west area and ensuring a cohesive and consistent streetscape along east-west streets. More detail will be provided in the subsequent SPD.

**316. Should Policy CHA07 refer to the use of sustainable drainage?**

See response to Question 292

**317. Given the growing residential community, should this policy safeguard cultural activity venues from inappropriate development that might curtail their ability to host events?**

Council has already suggested a city wide modification on protection of cultural facilities.

**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?**

The area is currently characterised by creative workspaces, some of which are in buildings that have been repurposed for that use. Most of the west of the area is within a Conservation Area and so retention of heritage assets and securing a future use, if empty, would be encouraged by the Council. There remains an identified need for creative workspace in the area and so the re-use of empty buildings could provide a solution, as they have to date.

**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?**

The policy is flexible enough to support the above uses coming forward within this character area. The proposed SPD will provide further steer on adoption.



## **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?**

The Character area is primarily made up of heritage assets, including two Conservation Areas, numerous listed buildings and structures and archaeological assets with the highest concentration reflecting its historic core. All of which are detailed in the evidence document alongside key views and setting considerations. For that reason, in terms of future growth, development and opportunities will be limited. It is identified as an area which will 'respect and protect heritage assets' and 'evolution without significant change' and therefore conservation and heritage policies will be used to guide future development in the area, all of which provide guidance on protection, enhancement and mitigation.

- 321. Given the limited opportunities for development, and therefore financial contributions, how will the area's vision be achieved?**

The vision is representative of the existing unique character of the area which must be protected, maintained and enhanced. Therefore, the vision is already well established and does not need significant investment to achieve it. The policy focusses on maintaining what is there and achieving positive, small scale incremental change.

- 322. Should Policy CHA08 specify the number of dwellings expected to be provided within this character area?**

See answer to question 285

- 323. How would Policy CHA08 support proposals for the provision of small offices, new retail development and tourist-based leisure uses?**

The policy is flexible enough to support the above uses coming forward within this character area. The proposed SPD will provide further steer on this matter.

- 324. What is meant by 'small' offices in the third bullet point of Policy**

## **CHA08?**

Differentiating between large and small offices is helpful to provide clarity and certainty for office investors about where in the City certain types of offices should be promoted. Large offices for corporate occupiers typically have floorplates of 1,000sq.m. and above. Small offices may be regarded as any size smaller than that.

## **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?**

The Character area is primarily made up of heritage assets, including New Walk Conservation Area, numerous listed buildings and structures and archaeological assets. All of which are detailed in the evidence document alongside key views and setting considerations. For that reason, in terms of future growth, development and opportunities will be limited. It is identified as an area which will 'respect and protect heritage assets' and 'evolution without significant change' and therefore conservation and heritage policies will be used to guide future development in the area, all of which provide guidance on protection, enhancement and mitigation.

### **326. Should Policy CHA09 specify the number of dwellings expected to be provided within this character area?**

See answer to Question 285

### **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?**

The policy is flexible enough to support the above uses coming forward within this area. New Walk has long been a focus for office development, so allowing new small scale offices is a continuation of this, however, many of the buildings were owned by the university of Leicester, so allowing some educational uses would not be out of character of the mix of uses in this area.

### **328. What is meant by 'small scale' offices in the second bullet point of Policy CHA09?**

See answer to question 323

329. **Given the limited opportunities for development, and therefore financial contributions, how will the area's vision be achieved?**

See answer to Question 320

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?**

New Walk is one of the oldest pedestrian routes in the City. The evidence documents details the existing pedestrian routes and improvements to cycle and pedestrian routes delivered as part of the Council's Connecting Leicester project. Around £100m has been spent on improving connectivity within the CDA and making the area more attractive. This has been funded predominantly by central government and the relevant funding from the council itself.

Public Transport and walking distances to main transport hubs are also detailed. The evidence document also outlines improvements to streets and the public realm to improve the pedestrian experience in the area, connecting to the transport hubs and the wider city. This will be explained further in the proposed SPD.

### **Policy ORA01 – Abbey Meadows and Pioneer Park**

331. **Should Policy ORA01 indicate quantities of development required to ensure effective regeneration of the area?**

See Question 285

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?**

The policy is flexible enough to support the above uses coming forward within this area, noting there is existing adopted abbey meadows SPD for this area which the council may update in due course.

### **Policy ORA02 – Waterside**

**333. Should Policy ORA02 indicate quantities of development required to ensure effective regeneration of the area?**

See answer to Question 285

**334. Is Policy ORA02 consistent with national policy in terms of creating strong neighbourhood centres or should more flexible employment uses be encouraged?**

It's the council's opinion that policy offers enough flexibility in regards to employment uses.

**335. Are there any environmental or other site constraints, including flood risk, that will inhibit the development of the allocation as envisaged?**

The council's opinion is there are no environmental constraints which inhibit the development of allocation. Noting that part of the site has already been delivered and extensive flood risk mitigation have already been carried out within this area.

**Policy ORA03 – University of Leicester**

**336. Should Policy ORA03 indicate quantities of development required to ensure effective regeneration of the area?**

See answer to question 285

**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?**

The council is not proposing to identify specific sites for any form of residential development within the CDA. In regard to student development it is the council's opinion that the requirements of the student housing policy (Ho08) are adequate, which is a criteria based policy to determine suitability of any new student development. Therefore, it is down to the developer to prove that additional student accommodation would be required. If the plan was to define specific areas where student accommodation would be a priority this would potentially undermine this policy as well as the council and national policy requirement for balanced communities.

**338. Is Policy ORA03 consistent with national policy in terms of creating strong neighbourhood centres or should more flexible employment uses be encouraged?**

It's the council's opinion that the policy offers enough flexibility as written.

**Policy ORA04 – Leicester City Football Club**

**339. Should Policy ORA04 indicate quantities of development required to ensure effective regeneration of the area?**

It's the council's opinion that the policy should not indicate quantities as an application for redevelopment of site has been approved.

The planning application (20212673) for the development and expansion of Leicester City Football Club was approved by the Council in December 2023. The quantum of development permitted was agreed by the Council and LCFC. This was detailed in the conditions 33, 34 & 35 of the approval, as shown below.

- Plot 1 – proposed club shop, Class E(a) up to 2,083sq.m
- Plot 2 – proposed hotel and business centre under Classes C1; E(b) and E(g)- up to 4,329sq.m
- Plot 3 – residential building under Classes C3; sui generis (residential); E(b) and E(g) – up to 4,075sq.m
- Plot 4 – arena building (sui generis)
- Plot 5 – multi-storey car park and energy centre (sui generis)
- Plot 6 – south west pavilion under Class E(g)- up to 2,135sq.m

It's the council's opinion that the policy should not indicate quantities as an application for redevelopment of site has been approved.

**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?**

The following has been included in the application (20212673); new club retail store, hotel, commercial office space and food & beverage

uses, residential block, multi-purpose arena, multi-storey car park and energy centre.

**341. Should Policy ORA04 encourage more flexible employment uses in order to develop a strong and cohesive regeneration area?**

It's the council's opinion that the policy offers enough flexibility as written.

**Policy ORA05 – Walnut Street**

**342. Should Policy ORA05 indicate quantities of development required to ensure effective regeneration of the area?**

See answer to question 285.

**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?**

This has not been factored in the viability study as the council has been the key delivery body in regard to the council's 'on going' connecting Leicester project. Around £100m has been spent on improving connectivity within the CDA and making the area more attractive. This has been funded predominantly by central government and the relevant funding from the council itself.

# Appendix 1 – Proposed Structure and timescale for production of future Character Areas SPD

Leicester's regeneration is a key theme of its development plan. In considering the Central Development Area (CDA) of Leicester, areas have been identified that have distinctive characters and context, identity, opportunities and challenges and, therefore, different development objectives. These areas will also significantly address the city's future housing needs.

To support the review of its Local Plan, LCC ensured that the new Local Plan is based on sound, up-to-date and relevant evidence about the spatial, economic, social and environmental characteristics and prospects of the area (Paragraphs 31, 32, 33 NPPF), producing robust and detailed 'Townscape Analysis and Design Guidance' evidence documents for each character area. Each evidence document focused on one character area, providing the base for guiding future development, identifying opportunities for improvements, addressing urban design or spatial weaknesses and highlighting development opportunities and even intensification potentials.

Moving forward and supporting the new Local Plan, the previously produced guidance is now taken forward, forming Supplementary Planning Guidance (SPD) as a Design Code. A Design Code SPD will be created for each identified character area, primarily focusing on the character areas where significant change is expected. Each Design Code SPD will support the city's new Local Plan by explaining how aspirations and policies within the new Leicester Local Plan will be materialised, providing details on how to interpret and assess it. The skeleton of the pilot Design Code SPD is presented below.

## 1. Introduction

Chapter 1 explains the overall document to the reader. It begins by defining and describing Leicester's development context, illustrating where growth is expected within the CDA and how the CDA is further divided into character areas. Then, the Council's approach to townscape character management is presented, followed by a summary of the relevant, existing, overarching policy (NPPF, National Design Guide, National Model Design Code, Leicester Local Plan).

Moving forward, Chapter 1 presents the document's scope as an SPD in the form of a Design Code, stating its role and function in guiding the delivery of development needs identified within the new Leicester Local Plan. Moreover, the document will serve as a valuable tool, providing a set of specific and tangible parameters for the physical environment within the character area it deals with. It further presents the people/ groups of people for whom the document has been designed and created while clearly explaining how the reader should use it. At this point, vital definitions, symbol explanations, and a typical page overview help the reader understand and further use the document. Chapter 1 concludes with the presentation of the overall structure/ skeleton of the document. Specifically, Chapter 1 is subdivided into the following sub-chapters:

- 1.1. Development Context**
- 1.2. Townscape Character Management**
- 1.3. Overarching Policy**
- 1.4. Heart of Leicester**
- 1.5. The Scope**

- 1.6. Who Is it For
- 1.7. How to Use the SPD
- 1.8. The Structure

## 2. Character Area at A Glance

Chapter 2 presents the character area each document will focus on, avoiding duplications with the additional evidence-base documents as much as possible. This chapter bridges the gap between the formerly produced evidence-base documents and the new Design Code SPDs. Thus, Chapter 2 locates and briefly describes the character area (eg. St. George's Cultural Quarter Character Area), summarising its main components, unique characteristics, defining attributes and existing connections and relations. Having critically evaluated all analytical outcomes (work done in the evidence-base documents), this chapter presents the main constraints and development opportunities found within the studied character area.

Chapter 2 concludes with the Council's approach to managing growth expectations through cohesive development. Managing growth and creating good, desirable and character and context-appropriate growth while adhering to and complying with the new Local Plan policies have been the critical drives behind all undertaken work. Thus, a high-level vision for the area's (e.g. St. George's Cultural Quarter Character Area) future development has been established, setting the objectives for future development. Specifically, Chapter 2 is subdivided into the following sub-chapters:

- 2.1. Location and Context
- 2.2. Evidence Base Analysis Summary
- 2.3. Scale Context & Updates
- 2.4. Constraints and Opportunities
- 2.5. Managing Growth
- 2.6. Establishing a Vision

## 3. Character Area Wide Framework

Local Plan policies, managing growth expectations, and the vision for each character area will be accomplished and materialised by creating place-specific interventions and improvements for delivery in the form of a **Character Area-Wide Framework** and a set of **Design Codes**. Chapter 3 presents, explains, and illustrates the Character Area-Wide Framework associated with the character area each SPD will focus on, referring to character area-wide interventions/ deliverables the Council will support, lead, and guide in cooperation with other involved parties and developers. It is divided into three main themes: movement, public realm, and new development, supported by appropriate maps, illustrations and explanations. Specifically, Chapter 3 is subdivided into the following sub-chapters:

- 3.1. Introduction
- 3.2. Movement
- 3.3. Public Realm
- 3.4. New Development



## 4. Design Codes

In addition to Chapter 3, Chapter 4 presents and further illustrates the design codes that future applications must comply with. It clearly states the applicant's responsibilities regarding how good and appropriate growth will be created and accommodated. The design codes are divided into different design themes, areas of application and mandatory or advisory requirements.

- A. The Design Code SPD follows the rationale and aligns with the National Design Guide and the National Model Design Code, using the design themes explained in those documents. Those overarching, national design documents cover all potential scenarios across the country. Thus, the selected design themes have been adjusted to the issues and peculiarities of Leicester's character areas, creating codes for context, character and identity, height and massing, built form, appearance, movement, landscape and public realm, uses and homes and buildings.
- B. Two types of design codes have been created: the '**All Character Areas**' codes, applicable to all defined within the CDA character areas, and the '**Character Area Specific**' codes, applicable only to the specific character area or a specific place within that character area in which each SPD focuses on.
- C. The design codes included in the SPD are prepared with the needs of applicants, designers and officers in mind so that they are practical, setting out clear justifications and requirements. Creating place-specific policies in the form of design codes differs from creating design guides by enabling binary decision-making as to whether the presented codes have been followed. They do this through careful use of language, relying on two keywords to establish the hierarchy of importance for the requirements set out. A '**must**' code is a mandatory code that represents an essential requirement to be met; and a '**should**' code is an advisory code that represents a requirement that is encouraged to be met.
- D. It will also be indicated which codes apply to major development schemes and which ones to minor development schemes.

Appropriate justifications, explanations, requirements, maps, illustrations and precedent images follow the design codes. Specifically, Chapter 4 is subdivided into the following sub-chapters:

- 4.1. Implementing the National Design Guide**
- 4.2. Context**
- 4.3. Character and Identity**
- 4.4. Height and Massing**
- 4.5. Built Form**
- 4.6. Appearance**
- 4.7. Movement**
- 4.8. Landscape and Public Realm**
- 4.9. Uses**
- 4.10. Homes and Buildings**

## 5. Comprehensive Design Codes Compliance Checklist

Chapter 5 provides a comprehensive checklist, including all design codes within the SPD, divided by design theme and application area, as a helpful tool for applicants and officers.

## 6. Glossary

**Proposed Timescale for production of future Character Area SPDs based on Local Plan adoption in late Spring 2025.**

Stage	Dates
SEA/SA Scoping	December 2024 to January 2025
Prepare Draft SPDs	February to June 2025
Consult on Draft SPDs	July to August 2025
Update/Amend SPDs	September 2025
Adoption	By the end of 2025.