

Leicester Local Plan 2020 – 2036: Examination in Public

Hearing Statement by Leicester City Football
Club (Rep ID 80)

Matter 6: Central Development Area
September 2024

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Leicester City Football Club

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LEGM3000

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1. Introduction

- 1.1 This Hearing Statement is prepared by Turley on behalf of Leicester City Football Club (hereafter 'LCFC' or 'the Club') in respect of the examination of the Leicester Local Plan 2020-2036. It provides LCFC's response to the Matters, Issues and Questions ('MIQs')¹ identified by the Inspectors in respect of Matter 6: Central Development Area.
- 1.2 This Statement is made in relation to LCFC's development interests associated with the King Power Stadium and surrounding land, which benefits from hybrid planning permission² for comprehensive mixed-use re-development, anchored by the expansion of the East Stand of the Stadium ('the King Power Stadium Masterplan Redevelopment').
- 1.3 LCFC has engaged extensively in the preparation of the Local Plan, including the submission of representations to the Regulation 18 draft Local Plan in December 2020 and Regulation 19 draft Local Plan in February 2023.
- 1.4 In overall terms, LCFC is supportive of the emerging Local Plan and consider it imperative that Leicester has an up-to-date Local Plan, and one which provides the policy tools for the planning system to support sustainable growth, in accordance with national planning policy.
- 1.5 Notwithstanding such support, LCFC has identified a number of issues and concerns relating to the soundness of specific policies within the emerging Local Plan. Amendments to the emerging Local Plan in respect of these areas are suggested to address the points of soundness raised.

¹ EXAM 12: [Leicester LP Examination - MIQs - Aug 24](#)

² LPA ref. 20212673 - Hybrid application comprising: FULL application for the extension of the East Stand of the King Power Stadium to provide additional seating capacity with ancillary facilities; associated works to the North and South Stands and public realm / hard landscaping works; and OUTLINE application for new club retail store, hotel, commercial office space and food & beverage uses, residential block, multi-purpose arena, multi-storey car park and energy centre; with associated public realm / hard landscaping works (with all matters reserved except for site access).

2. 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?

Policy ORA04 – Leicester City Football Club

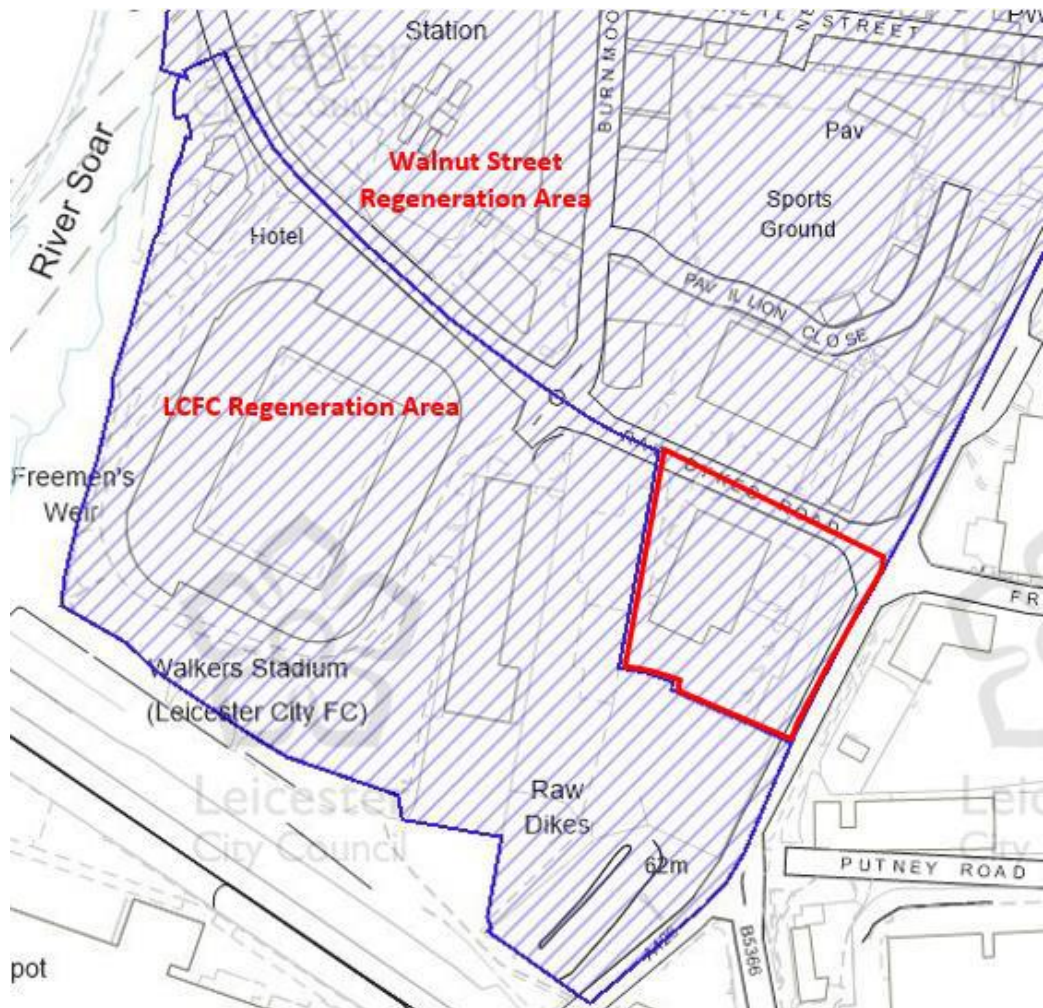
- 2.1 LCFC continues to support Leicester City Council’s vision for Leicester as set out in the emerging Local Plan. The Club has always been at the heart of the city. Its considerable success on the pitch since winning the Premier League title in 2016 makes an important contribution to the image and attraction of Leicester as a place to visit. For that reason, LCFC fully support the inclusion of its land within the Central Development Area (CDA) and the identification of the LCFC Regeneration Area (Draft Policy ORA04) within that. It recognises the important role that the Club has, and the opportunities it provides, for the on-going regeneration of the city.

Q339: Should Policy ORA04 indicate quantities of development required to ensure effective regeneration of the area?

- 2.2 The Club does not consider that Policy ORA04 should prescribe quantities of development within the LCFC Regeneration Area. Whilst the hybrid planning permission specifies floorspace limits through the approved Parameter Plans and specific planning conditions relating to floorspace quanta (Conditions 33 and 34) these are specific to the current King Power Stadium Masterplan Redevelopment and were defined to enable testing and assessment through the application and its supporting assessments, and will be further managed by way of the commitments set out in the associated Section 106 Agreement. Limiting through the policy risks restricting future growth / expansion of development within the site or the ability to amend or update the King Power Stadium Masterplan Redevelopment in order to reflect market requirements – something which is commonplace with long-term multi-phase developments such as that granted through the hybrid planning permission, which could limit the regenerative benefits of any future re-development proposals.
- 2.3 In addition, to ensure that the LCFC Regeneration Area delivers the greatest level of benefit the Club considers that the boundary should be amended. The Reg 19 Draft Local Plan identifies land previously occupied by EON, and which comprises an existing office building on the junction of Raw Dykes Road and Aylestone Road (A426), within the Walnut Street Regeneration Area (Draft Policy ORA05) (**Figure 2.1**). The Walnut Street Regeneration Area is focused on residential led (Use Class C3) regeneration and improving connectivity between the city centre, LCFC Regeneration Area, the Leicester Royal Infirmary and De Montfort University character areas. It is important to note that the former EON site is severed from the main Walnut Street Regeneration Area by Raw Dykes Road and would therefore be isolated from the wider regeneration area. Conversely, the EON site is located immediately adjacent and connected to the boundary of the hybrid planning permission for the King Power Stadium Masterplan Redevelopment, on the same side of Raw Dykes Road as the LCFC Regeneration Area.

- 2.4 As set out in LCFC's Regulation 19 Representations, the Club have now acquired the former EON site. Although the former EON site is not included within the boundary of the hybrid planning permission, as it was in the process of being acquired when the King Power Stadium Masterplan Redevelopment proposals were developed, it is now within the Club's ownership and is adjacent to the hybrid scheme. Therefore, the Club considers that this land would be best served by being included in the LCFC Regeneration Area, enabling it to be considered for a broader range of potential uses associated with the wider King Power Stadium Masterplan Redevelopment and complementing the hybrid planning permission. This land presents a logical extension of and is better related to the LCFC Regeneration Area than to the Walnut Street Regeneration Area and should be included within it. This would help to maximise the beneficial effects of redevelopment of the EON site as its future use would be able to better complement the mix of uses and masterplanning / placemaking that are achieved through the hybrid planning permission.
- 2.5 Furthermore, Draft Policy ORA04 also supports residential development within the LCFC Regeneration Area and would therefore not preclude any overall delivery of residential uses within the city centre (i.e. by removing it from the Walnut Street Regeneration Area). This Hearing Statement sets out suggested amendments to Policy ORA04 to diversify the type of housing to be delivered in this area and seeking to ensure alternative types of residential development are not precluded.

Figure 2.1: Regeneration Area Boundaries (with EON site bounded red)



Source: Extract of [Leicester City Maps](#)

Q340: 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?

- 2.6 The Club welcomes the inclusion of Policy ORA04 which seeks to support the continued development of the King Power Stadium and surrounding land within the Club's ownership. It establishes a strong policy basis upon which proposals for the expansion of the Stadium, as well as the diversification of other ancillary uses can benefit from in-principle support.
- 2.7 Subject to the amendments requested within this Hearing Statement (under responses to Q339 and Q341), LCFC consider that Policy ORA04 would be sound.

Q341: Should Policy ORA04 encourage more flexible employment uses in order to develop a strong and cohesive regeneration area?

- 2.8 Government has in recent years introduced a raft of changes to the Use Classes Order³ and the General Permitted Development Rights Order⁴ to remove restrictions and enhance the flexibility afforded to Class E (Commercial, Business and Service) uses. Therefore, ensuring equivalent flexibility within Local Plan policy is considered appropriate and would ensure consistency with national policy.
- 2.9 The Club consider that Policy ORA04 as drafted does not fully appreciate the full opportunity that the site offers or the range of uses which could be delivered, as considered appropriate through the grant of hybrid planning permission for the King Power Stadium Masterplan Redevelopment. Such uses would also be consistent with other policies in the draft Local Plan and the strategic objectives for Leicester set out in the Tourism Action Plan, as well as One Leicester: Shaping Britain's Sustainable City and Leicester: Great City Economic Action Plan 2016-2020. To that extent, the policy fails to meet the overall vision of the Local Plan and the ambition of the city.
- 2.10 Therefore, LCFC requests that the Local Plan is modified to broaden the range of uses identified in Draft Policy ORA04 to reflect the hybrid planning permission (Condition 32) for the King Power Stadium Masterplan Redevelopment, comprising support for:
- The expansion and enhancement of the King Power Stadium;
 - New Club Shop (Use Class E(a));
 - New Hotel accommodation and Business Centre (Use Classes C1, E(b) and E(g));
 - New Office floorspace (Use Class E(g));
 - New leisure development, including a multi-purpose arena (Sui Generis);
 - A wider range of residential uses, beyond Use Class C3, including student accommodation (Sui Generis);
 - Ancillary retail and food & beverage uses (Use Class E(a), E(b) and E(g)); and
 - New Multi-Storey Car Park (Sui Generis).
- 2.11 The above amendments would ensure consistency between Policy ORA04 and the hybrid planning permission for the King Power Stadium Masterplan Redevelopment, supporting the range of employment-related uses which have already been found by the Council to be acceptable in this location (through the grant of planning permission).
- 2.12 In addition to the amendments relating to flexible employment uses, as set out in the Regulation 19 Representations the Club consider that Draft Policy ORA04 as currently

³ Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020

⁴ Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2021 and Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2024

drafted is overly restrictive in respect of residential uses. The Council's response⁵ to the Regulation 19 Representations does not adequately address the reasons for this restriction and therefore LCFC maintain their position that Policy ORA04 is not positively prepared.

- 2.13 As drafted the policy restricts the proposed residential uses to Use Class C3, which does not reflect the range of housing tenures which could potentially be delivered at the site as considered within the hybrid planning permission for the King Power Stadium Masterplan Redevelopment, including purpose-built student accommodation ('PBSA'), build to rent ('BTR') and market sale housing, as well as other residential uses such as co-living. The residential component of the King Power Stadium Masterplan Redevelopment is in 'outline' and therefore the precise tenure mix will be determined at reserved matters stage in accordance with the terms of the associated Section 106 Agreement. As such, Draft Policy ORA04 does not provide sufficient flexibility to deliver a non-C3 residential development and is therefore inconsistent with the hybrid planning permission. It is also in conflict with the terms of Draft Policy Ho03 which promotes a mix of house types, tenures and sizes. The Framework is also clear about the need to provide a range of housing types and tenures, to support aspirational plans and sustainable economic growth and prioritise development in sustainable locations. LCFC considers that Draft Policy ORA04 does not incorporate adequate flexibility at present. It therefore risks being ineffective, not positively prepared and inconsistent with the Framework (as well as other policies in the Draft Local Plan which reflect the evidence around housing need). In such circumstances the Plan would be unsound and therefore LCFC requests that Draft Policy ORA04 is amended to enable a broader mix of residential uses to be delivered within the LCFC Regeneration Area. Suggested amendments are provided below.
- 2.14 Furthermore, Draft Policy ORA04 as currently drafted fails to consider the potential of the site to support the delivery of PBSA, which is consented within the hybrid planning permission for the King Power Stadium Masterplan Redevelopment. The Council's response to the Inspectors' Initial Question 11⁶, confirms that the majority of student accommodation will be delivered within the CDA and therefore the Club considers that Policy ORA04 should recognise the potential for delivery of PBSA within the LCFC Regeneration Area (as part of the CDA). In accordance with Draft Policy Ho08, the LCFC Regeneration Area is accessible by sustainable means from the city centre and is within reasonable walking and cycling distances of the two main university campuses. Furthermore, the proposed residential component of the King Power Stadium Masterplan Redevelopment, comprises ground floor F&B uses. Therefore, LCFC requests that Draft Policy ORA04 is amended to incorporate provision for delivery of PBSA within the LCFC Regeneration Area.
- 2.15 On this basis, LCFC requests that the wording of Draft Policy ORA04 is amended as follows (amendments shown in red underlined text):

⁵ EXAM 4: [exam-4-regulation-22-statement-of-consultation-updated-jan-2024.pdf \(leicester.gov.uk\)](#)

⁶ EXAM 3 (Page 11): [exam-3-lcc-response-to-inspectors-initial-questions.pdf \(leicester.gov.uk\)](#)

Within the area defined as 'Leicester City Football Club' on the adopted policies map, development will be expected to support the continued development of the football stadium and associated facilities. This will be achieved by:

- Supporting the expansion and enhancement ~~to the King Power (LCFC) Stadium of the football stadium;~~
- Supporting proposals for ancillary development such as hotels, offices and other developments which are normally found at and around sporting stadia (including retail and food & beverage related uses);
- Supporting proposals for leisure related development, including a multi-purpose arena capable of hosting a range of events; and
- Delivery of residential uses, including homes of a range of tenures, types and sizes in accordance with Policy Ho03, (class C3) where it does not undermine the proposals for the expansion and enhancement of the stadium. This may include purpose-built student accommodation, build-to-rent and/or co-living accommodation (in accordance with Policy Ho08).

Turley Office

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