

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?**

Yes. The Council is of the opinion that this is policy is of some benefit to set the context of the Plan and has been included based on past informal advice from the Government. However, the Council is happy to remove this as more detailed policies for sustainable growth are contained within the Plan, and the informal guidance is no longer promulgated.

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?**

Yes – a balanced decision should be taken. The vision sets out the arching aspirations for of the Local Plan, which has balanced against the need to achieve sustainable growth. It has been shaped from the spatial portrait and the council's corporate policies and strategies. The objectives set out in more detail how the Local Plan will support the Vision. Although climate change, the natural environment and biodiversity are addressed in objectives 2 and 8 the Council is willing to amend the vision to further highlight these issues should the Inspectors consider it to be necessary:

"A confident city with a reputation as a cosmopolitan, creative and academically rich place, in which businesses thrive and there is a strong sustainable growth in housing jobs and skills.

Our ambition for sustainable growth will be balanced against the need to combat climate change and protect and enhance the natural environment and biodiversity in our city.

A place where all people who live, work and enjoy the city feel proud to belong to our city and that the city belongs to them."

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?

The council have covered all of these aspects through the non-strategic policies throughout the Plan (in compliance with para 21 of NPPF). Any planning application coming forward would be expected to address all relevant policies within the Plan and inclusion of a policy would lead to an unnecessary duplication of policies. Infrastructure is covered in policies DI01 and DI02, community facilities in policy CT01, the Natural Environment through policies in Chapter 15 (Natural Environment), green infrastructure and open space (Chapter 14) and climate change (Chapter 6). The policies cover all of the points above.

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?**

The Council believes that this is useful to set the context of how growth will take place in the city and wider Urban area. The policies in the Plan do not apply to any land outside of Leicester City Council's boundaries and the Council will continue to work together with neighbouring districts on cross boundary matters.

The Council have not undertaken a detailed assessment of the strategic growth areas or its alternatives beyond its administrative boundaries which we believe will be within the remit of the individual local plans in the Housing Market Area. The city council has agreed to remove some land within LCC ownership as part of a Main Modification to Diagram 2 (EXAM 8, MM5). This includes part of the former Western Park golf course that falls within Blaby district council's administrative area. This is in response to Blaby District Council's representation and to not preclude development of the site within Blaby until a full assessment has been completed on the potential site as part of their future local plan.

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?

The Infrastructure Studies (REFs EB/DI/1, EB/DI/1a EB/DI/2) and transport evidence have not identified any major large-scale infrastructure which could be seen as a 'show stopper' for the plan.

In regard to highways & transportation infrastructure, the Plan identifies the transport infrastructure that will be required based on current evidence and is prioritised within the Transport Infrastructure Assessment (TIA) (Ref EB/TR/2) in sections covering different time periods, covering five year periods.

Leicester City Council has utilised the Pan Regional Transport Model (PRTM) administered by Leicestershire County Council's Transport Modelling, to inform the evidence base and decisions. The outputs from PRTM allow this data to be interpreted to provide an insight into the potential future transport demands and impacts of travel. PRTM is DfT TAG compliant and validated accordingly to provide outputs accepted by the DfT in funding bids.

Packages of funding will continue to be required over the lifetime of the Plan towards delivery of the mitigation package and various Government funding pots have come and gone over the years associated enabling the delivery of growth. The same is likely to hold true for the future; over the Plan's lifetime Governments are still likely to be making monies available to support economic growth and to help to deliver on net-zero policy aspirations / requirements. Leicester City Council has a long and successful history of bidding for additional funding, for example from DfT, ERDF, DEFRA, for additional funding over and above, general Government allocations, to deliver transport infrastructure to support growth. Some examples are set out below:

- Transforming Cities Fund - (2019-2020) - £71m for improvements in sustainable transport
- National Productivity Investment Fund – (2017) - £5.43m for Putney Road West Project and Urban Congestion Bus Pinch Point Improvement Project
- Getting Building Fund (2020) - £10.5m for Leicester's St. Margaret's Bus Station
- ZEBRA funding - (2021) £22m awarded towards the purchase of 116 fully electric buses.
- ERDF funding – £12m fund to deliver a collection of transport projects to improve air quality.

- Local Transport Fund (2024) – nearly £160m has been allocated towards a range of local transport measures.

Notwithstanding the above it is accepted that funding streams for the extent of the Plan are less predictable the further we look into the future.

Accepting this fact, Leicester City Council will continue to base its decisions and transport infrastructure needs on evidence. Further transport studies will be undertaken over the Plan period as new data is collected. These studies will support future bids for any additional funds that will be required to deliver the Plan and the associated transport infrastructure in the timely manner to support growth.

Finally, Section 106 Legal Agreements have been secured, where justified, to fund appropriate off-site infrastructure needed to mitigate the impacts of development.

The council also have a very good track record of delivery, as well as working with partners such as Homes England.

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?

Given the limiting circumstances outlined in the Council's response to Inspectors' initial question 5 (Exam 3), the council is confident that the plan is positively prepared, justified and consistent with national policy. The justification behind the Plan Period is outlined further in the Housing and Sites Topic Paper (TP/5, pages 9-10).

The council are keen to progress with the submitted Local Plan to ensure that an up to date local plan is produced and that development within Leicester is therefore not hindered. Factors that have slowed down the production of the Plan have largely outside of the council's control, including the Covid 19 pandemic and 35% uplift for the 10 major cities.

In addition to this, the evidence base that forms the submission Plan were all commissioned up to 2036. The council believes that recommissioning these studies will add significant time to the process and have disproportionate cost implications for the adoption of the Plan.

Leicester's unmet need has been agreed across the districts which is documented in the signed and agreed 'Leicester & Leicestershire

Authorities - Statement of Common Ground relating to Housing and Employment Land Needs (June 2022)' (SCG/1). If the plan is not adopted, this will have significant implications to neighbouring authorities Local Plan preparation and will need to be revisited.

The council acknowledges that the timeframe of the Local Plan upon the proposed adoption date would only be 11 years, but reflects that it would be unfeasible to extend the Plan Period for the reasons noted above. However, the Council is committed to doing an immediate review of the Plan once adopted.

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?

As stated in the response to question 19, the council is committed to doing a review of the Plan once this Plan is adopted. The signed and agreed Statement of Common Ground June 2022 (SCG/1) has established the apportionment of unmet housing and employment needs up to the end of the Plan Period (2036). However, the SCG will be reviewed and updated as part of ongoing joint work between the partner authorities in the Housing Market Area and Functional Economic Market Area. This is highlighted in section 5 of the L&L Statement of Common Ground (SCG/1 paragraphs 5.4 and 5.5).

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?

This is both justified and effective. This approach will maximise land for residential uses without disproportionately impacting any of the other objectives of the Plan (SD/2, pages 27-28). The Local Plan seeks to prioritise brownfield land development to enhance the city's viability and make best use of land in an environmentally conscious way, therefore meeting with the objectives outlined in the 'Vision for Leicester'. Most of Leicester's brownfield land is contained within the CDA, so would seek to maximise development in the most sustainable way.

The council have completed a range of capacity work to support the track record of delivery in the CDA and to support the development of

the city centre. There are limited options for development in the city's administrative boundaries and the council has maximised land use within the core development areas and other areas in sustainable locations. 628 dwellings per annum have been delivered in the CDA in the past 5 years including a range of housing types. The Housing and Sites Topic paper (Document TP/3, pages 15-16) highlights the positive delivery rates in the CDA.

To ensure that delivery continues to be effective in the CDA, the council are working with government bodies such as Homes England to unlock development sites within the CDA. Utilising Compulsory Purchase Orders in areas such as the train station has allowed the council to promote development in key areas of the city centre.

In response to previous representations made on the site and to maximise development in the CDA, the Council have increased densities to a minimum of 75dph in the CDA which allows the balance of good design principles in line with existing building structures. The density proposed sensitively considers the historic centre and current streetscape to promote a positive design.

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?

The capacity in the Central Development Area is based on the supporting evidence (Leicester Central Development Area Residential Capacity Study (2022) – EB/CD/10) which tested a number of scenarios for growth. The Council chose the medium growth option as set out by in the submission document (Leicester Central Development Area Residential Capacity Study (2022) – EB/CD/10) and updated this to include recent completions. The Local Plan does not allocate sites within the CDA but instead has a target number for the whole area. This is also represented in the 'Leicester City Council Strategic Housing & Economic Land Availability Assessment (September 2022)' (EB/HO/3) as a whole site for the CDA (Site 1048), with capacities identified in the CDA capacity study.

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?

Yes, the viability report (EB/DI/3) sets out in detail the viability situation in Leicester. It shows that the overall growth proposed across the city maximises the opportunities to viably address the affordable housing need. The council recommissioned Viability evidence in between Regulation 18 and Regulation 19 consultations to consider additional areas to meet the affordable housing need. The affordable housing policy (Policy Ho04) was updated to reflect the findings of this prior to the Reg 19 consultation, including the requirement of 10% on brownfield land with high density schemes and in the areas of Ashton Green and south east indicated in Diagram 3 of the Local Plan (SD/2, p. 58). Previously it was proposed that there would be a 30% requirement for affordable housing need only through the greenfield site allocations. This approach has been supported by a Whole Plan Viability assessment (EB/DI/3 - Whole Plan Viability Assessment (2022)) which provided recommendations for affordable housing requirements on pages 157 and 158.

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?

The council supports this approach to windfall sites. The inclusion of reference to windfall development has been identified as a main modification (MM6 in Exam 8). This is with the aim to make the policy more positively worded and to include the reliance on the windfall development as part of strategy.

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?

Policy H08 'Student Development' provides the specific criteria that is required for student development to gain approval. However the council recognizes the importance of student as part of the strategy and therefore would be happy to consider this as main modification to Policy SL01

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?

Campbell Street and Phoenix Square, the latter in the Cultural Quarter, St Georges, are identified as the main individual opportunity sites for E(g)(i) offices in the city. The Local Plan focuses on these two locations specifically as both project areas are under a high degree of public sector control, giving the City Council and partners more say over their development, the ability to contribute financially to support delivery, and more confidence that the quantum of office space proposed will be delivered.

Campbell Street is part of the Leicester Station Gateway project which includes significant remodelling of Leicester Railway Station, a new food and drink plaza and Grade A Offices. The wider project is progressing under City Council leadership, with public funding supporting the Railway Station refurbishment. At Phoenix Square, the land on which any offices might be developed is City Council owned.

There are other office opportunity sites in Leicester, with an example being the Great Central Scheme in Waterside where one office unit of 3,084 sqm (No.1 Great Central Square) has been developed and another 5,713 sqm proposed property (No.4 Great Central Square) is on the market. However, these are private sector schemes which have been, and continue to be, subject to considerable variation in the scale and nature of the offices which will be brought forward, as developers respond to changing market conditions. As there remain uncertainties about the quantum of offices they can bring forward, on what plots and when, so a site specific allocation in Policy SL01 would not be justified.

Given the uncertainty on delivery of offices on any specific site, other than the two highlighted, the Local Plan pursues a policy of identifying broader character areas where office development is supported and encouraged including, as mentioned, Waterside, the Old Town and New Walk, but also the St. George's Cultural Quarter (Policy E06) and the City Centre more generally (Policy TCR03). These are all wider policy areas, mostly densely developed locations in, and around, the City Centre where office development, which can help meet identified needs, is likely to occur, alongside the delivery of a range of other uses appropriate to the area.

Main Modification to policy SL01 (MM7, Exam 8) has also been added, which will include "additional office growth will also be supported

within the Waterside Regeneration area where it complements the existing residential led regeneration”.

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?**

A section 73 planning application (ref 20240895) has now been submitted. This will provide around 7.6 Hectares and the remainder is expected to be provided throughout all the sites by effective use of the land enabling around 20% over provision, as well as the 23 ha in Charnwood Borough Council’s administrative area.

33.9 sites, & 7.6 in sec 73 app, & 23 Charnwood Borough, = 65.5ha

Table 8. Supply of Employment Sites

Address	Size (ha)	+20%
Former Western Park Golf Course	9.74 ha +1.5 HWRC -0.5 G & T =10.75	12.9
Beaumont Park	7.14 latest -0.5 G & T =6.64	7.968
North of Birstall Golf course /East of Ashton Green	2.4 ha	2.88
Eastern part of Thurcaston Road/Hadrian Road open space	2.7 ha -0.5 G & T =2.2	2.64
Mountain Road	2.1 ha	2.52
East of Samworth’s Bradgate Bakery	5.0 ha	6.0
Total	29.59 ha	34.9

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?**

Yes, the housing target identified in the plan includes a buffer of 11% which the council believes provides the flexibility for housing needs.

Capacity Studies have informed the supply in the city and will be reviewed as part of a Plan review that is intended after submission of

the Plan.

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?**

The Plan has acknowledged waste infrastructure requirements in relation to delivering the growth proposed in Policy SL01 by allocating a household waste recycling centre (HWRC) within the Former Western Park Golf Course site (Policy SL02). However, the City Council's Waste Management Service has confirmed that there is sufficient capacity within existing waste facilities to accommodate local plan growth and that the proposed HWRC use is not required. This has been confirmed via a letter received from the land promoter which advises that the HWRC allocation should be removed from the site.

As stated in paragraphs 17.9 and 17.10 of the Local Plan, there are no known existing workable mineral deposits in the city and there has been little interest expressed by the industry in extracting from historic sites, primarily because the administrative area is covered by urban development or protected green spaces. Therefore, all minerals infrastructure required to facilitate local plan development will be imported from other minerals planning authorities.

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?**

The housing requirement does not need to be altered and this is justified, effective and consistent with national policy. The Council have limited available and achievable land within its administrative boundaries; capacity work has been undertaken based on all this available land within the city. Therefore, the housing target of 20,730 dwellings (1,296dpa) is justified given the limited land availability and to promote sustainable development in accordance with all other objectives of the Plan. As per the requirements of the NPPG, the

Council have included the 35% uplift for major cities in all calculations around housing need.

The Strategic Housing and Economic Land Availability Assessment (EB/HO/3) and the housing and sites topic paper (TP/5) both evidence a full assessment of the sites for growth of potential housing supply. The sites within the SHELAA have been sourced from a range of sources including internal submissions, call for site submissions and other sources. This emphasises the Council's extensive evidence to identify available and achievable land across the city before considering alternatives.

The Council have applied a number of measures to ensure that development is maximised on available and achievable land. On all allocated sites (with the exception of those with approved planning permission prior to September 2022) the Council have increased densities between Regulation 18 and Local Plan submission. This is in response to representations at Regulation 18 and the recognised need that this could be balanced against other constraints to create sustainable development. Furthermore, the housing target has included a buffer of 11% which is appropriate to allow for any changes in circumstances and to retain a low figure for unmet need.

The council recognises the importance that the remaining need is delivered. The Statement of Common Ground agreeing the distribution of the unmet need with neighbouring authorities has been signed by all parties and will be made available as requested.

The overall approach by the Council to housing growth has been assessed through a Sustainability Appraisal for alternatives, which have been taken account of in decisions about this approach. In the interest of maintaining a vibrant city centre balanced against the residential need, the council believe that the approach made to housing figures is the most appropriate. The Council believes that the figure of 2,464 dwellings per annum would be unachievable before 2036, given the aims for sustainable development and the extreme constraints that Leicester faces.

The council will be happy to review this requirement in light of updated SCG as well as new housing need as part of plan review once the plan is adopted

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?

As explained above, the council's approach is justified and a target is most appropriate. The council has maximised the supply of land available for housing development within the city boundary and has signed and agreed a SCG to meet the unmet need identified. The target identified includes the 11% buffer as mentioned in question 30. This is to allow flexibility for any changes in circumstances on the delivery of sites as well as to not increase the unmet need beyond 18,694 homes.

The council have considered setting this as a minimum housing requirement. However, the council feels that, due to the constraints that the city faces and to meet the aims of other policies, this would not be suitable. A target is more applicable to Leicester and will help the council achieve and deliver sustainable development in accordance with the rest of the objectives in the Plan. This would therefore provide the sort of development that would be suitable for all groups in the City. The council will review this as part of the plan review once adopted.

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?

Yes, extensive work has been completed towards this Statement of Common Ground on the agreed working assumption of an unmet need from Leicester of 18,700 homes. The work considers housing provision across all of the HMA having regard to a range of factors including, the functional relationship of each District/Borough with Leicester City, the balance of jobs and homes, and deliverability considerations in each district/borough. Amalgamating these factors together, the unmet need is addressed and results in a redistributed housing provision that differs from the standard method starting point. From the SoCG (para 3.22)

A Sustainability Appraisal has assessed this approach to the distribution of housing need and deemed that the SoCG is a robust approach taken by the Council, whilst considering the alternative options for both housing and employment needs (SD/4 - Sustainability appraisal of the Reg. 19 Leicester Local Plan (September 2022), Pages 55-57).

The Leicester & Leicestershire Statement of Common Ground has been signed and agreed by all parties within the HMA, see document SCG/1, showing a shared agreement to take on unmet need but also the agreement of the understanding around Leicester's constraints.

The apportionment of Leicester's unmet need will be subject to testing in each Local Authorities Plan making and will be informed by evidence base that supports this.

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?**

Leicester has tight boundaries with limited land available. We have exhausted all opportunities within the city and when balanced against our housing need, housing has had to take priority. We have therefore a SoCG with Charnwood BC to agree to take on 23ha of our unmet employment need. Taken within the recent Section 73 application for Ashton Green (Application no. 20240895) which has now been submitted, (which will provide a further 7.6ha) and with an additional 20% on other allocated sites, our total need can be met. No land is allocated for strategic distribution uses (over 9,000sqm in size), as this need has been met elsewhere in the HMA.

Policy SL01 of the Plan positively prepared, justified and consistent with national policy in this matter. The land it proposes represents the realistically available employment land supply within the defined city boundaries at this time, reflecting the scarcity of development sites generally and the need to balance employment and housing requirements locally.

The initial identified supply was then assessed in Section 7.0 of the 2020 Economic Development Needs Assessment (EDNA) (EB/EM/1) which considered each sites' suitability, deliverability and market attractiveness using a methodology consistent with 'Stage 2: Site/broad location assessment' of Planning Practice Guidance Note 'Housing and Economic Land Availability Assessment' (Paragraphs 016-022). This confirmed the deliverability of defined employment sites.

Again, in conformity with Planning Practice Guidance Note 'Housing and Economic Land Availability Assessment', Section 6.0 of the

2020 EDNA (EB/EM/1) study also reviewed 93 Employment and Office Areas, of which 62 remain in E(g)/B-Class use, and 18 Potential Employment Areas across Leicester. Amongst other objectives, this was to determine if they could provide any additional brownfield employment land opportunities. This comprehensive review identified that the existing stock of employment land and premises in the City's Employment Areas was well occupied (41 of the 62 Areas were fully occupied at that time, with most others being over 90 percent occupied), with few brownfield redevelopment opportunities which could be provided in addition to, or instead of, the proposed employment sites. Even the Employment Areas which have been judged 'no longer viable' as industrial estates, business parks, etc. have been lost to alternative uses such as housing, rather than standing vacant.

Through this detailed exercise it was confirmed that the supply proposed in Policy SL01 represented the only realistically available employment land in the city boundary, which could be provided without impacting on the supply of land to meet other defined needs, such as housing.

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?

Yes, this has been agreed across the HMA. Leicester has tight boundaries with limited land available. We have exhausted all opportunities within the city and when balanced against our housing need, housing had to take priority.

It is justified and appropriate that the remaining unmet employment need of 23 ha will be distributed as agreed in the 2022 Leicester & Leicestershire Authorities - Statement of Common Ground relating to Housing and Employment Land Needs (SCG/1). Using recognised forecast methods, consistent with those identified in Paragraph 027 of the Planning Practice Guidance Note 'Housing and Economic Needs Assessment', the 2020 Economic Development Needs Assessment (EDNA) (EB/EM/1) identified needs for 46,000 sqm of offices and 67 ha of land for light/general industry and small scale storage and distribution uses.

As was discussed in the response to Question 33, the 2020 EDNA (EB/EM/1) also reviewed the realistically available supply of employment land in the city, defined at that time as 40.90 ha (see Para 10.52, Page 185 of the 2020 EDNA), i.e. well below the identified

need. A review of 93 Employment and Office Areas and 18 Potential Employment Areas across Leicester, also completed in the 2020 EDNA (EB/EM/1), confirmed the absence of any other local brownfield land which could fill this supply gap.

Given the supply shortfall, which could not be met locally, it was justified to look to neighboring authorities to fill the supply gap, through a statement of common ground, and in accordance with the duty to cooperate. This reflects Paragraph 025 of the Planning Practice Guidance Note 'Housing and Economic Land Availability Assessment' which recommends such an approach in these circumstances as well as Paragraphs 24-27 of the National Planning Policy Framework on duty to cooperate matters.

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?**

The need for land for industrial, storage and distribution uses needs to be corrected to 65ha, in order to rectify double counting office provision.

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?**

Yes, the strategic site policies (policies SL02-SL06) effectively set out what is required for development as they establish the main constraints that will need to be addressed in any planning applications coming forward. All the strategic sites state the need to work collaboratively with adjoining landowners, site promoters and neighbouring district councils to establish the mechanisms needed for growth of the sites. Further detail of the suggested mitigations needed in site development are listed within the 'Strategic Sites Proposed for Allocation in the Draft Leicester Local Plan (2023)' (SD/18), as well as the policies applicable

to each site. Leicester City Council have been actively engaging with neighbouring Local Authorities through Duty to Cooperate meetings to establish the mitigations needed on each site. Further to this, the council have liaised with land promoters on these sites to identify any infrastructure required for development, with the majority having little to no infrastructure needed.

The main cross boundary issue impacting on development in the north west of the city is in relation to transport, which is in regard to infrastructure. This will be covered within the North of Leicester Transport Study work, which is currently underway. Therefore, at this stage, the Council have not considered a Northern wide area Masterplan due to various issues. There are notable differences in stages of plan preparation between the City Council and other neighbouring authorities making a Northern wide masterplan complex.

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?

Yes, the policies are clear enough as written. The policies aim to provide general guidance on the development of strategic sites. Whilst the policy does not set out the exact requirements of the site, this would be expected as part of masterplanning in accordance with other policies within the Plan and the suggested mitigations in the site allocations document (SD/18).

Strategic site Statement of Common Grounds have been signed and agreed for the sites to agree matters for cross boundary matters to determine what is required for each site.

38. What are the timescales for the delivery of Masterplans for these strategic sites and who would be responsible for their preparation and delivery?

Fully detailed masterplans will be prepared to support outline/hybrid planning application submissions. Predictions of when these will be available vary on each site but estimated timeframes for these masterplans and subsequent delivery of each site have been included in the 'Housing Allocations and Commitments - Deliverability & Developability' document (EXAM 9). The Council have reviewed iterations of Masterplans and supporting documents for each of the strategic sites and are satisfied that the principle of development can be firmly set.

The Council continue to work collaboratively with landowners and site promoters, through discussions around these masterplans. The site promoters for the private landowners (Policy SL04 and SL05) have both sought pre-application advice in 2023/24, which the council has provided or will be providing a response to. Documents submitted include basic masterplans and technical supporting information to address some of the constraints.

The City Council's internal development team are responsible for the site promotion of three sites; SL02: Former Western Park Golf Course; SL03: Land to the east of Ashton Green and SL06: Beaumont Park, this will include the appointment of developers to prepared detailed masterplans for each of the sites. Mather Jamie are responsible for site promotion of SL04: Land to the North of A46 and David Wilson Homes will be responsible for site promotion of site SL05: Land to the west of Anstey Lane. In both cases, they will also continue to provide new versions of the masterplans as required.

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?

The Council have engaged with the site promoters of each of the strategic sites to understand the need for infrastructure on the site. Where applicable, this has been included within the policy as a requirement, along with generic infrastructure that may be required. The Council has a strategic infrastructure policy DI01 'Developer Contributions and Infrastructure' which links to 'Appendix 4. Infrastructure List'. This provides a list of required infrastructure to support development which the council believes is strong enough to support development. The council is willing to provide modification to provide further clarity around what infrastructure is required given the poor viability in the city.

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?

The Council is committed to doing a North of Leicester Transport Study which addresses issues relating to transport infrastructure. Leicestershire County Council and other local authorities helped informed the requirements for aspects such as education and healthcare.

41. Are the Strategic Site allocations justified, effective and consistent with national policy in respect of their impact upon the Green Wedge?

The strategic site allocations are justified, effective and consistent with national policy in respect of their impacts on the Green Wedge. The Council have undertaken a robust analysis of all sites to assess which would be suitable and available for housing development, including the assessment of Green Wedge designation. This assessment has been informed by the Green Wedge review and addendum (EB/OS/2 and EB/OS/2a) which finds that all strategic sites sit within medium to high scoring Green Wedge.

These Green Wedges do not have a specific designation in National Policy. However, the Green Wedge designations and policies have been devised in line with NPPF requirements on protection of Open Space (paras 98 and 99). The framework to assess Green Wedges has been agreed by all authorities in the Leicester & Leicestershire Housing Market Area as a Joint methodology for assessing and designating Green Wedges (EB/OS/1). Based on this, the Council have undertaken a Green Wedge Review and addendum (EB/OS/2 and EB/OS/2a) which has reviewed the quality of Green Wedges and indicated development pressure.

Given the pressure of housing need in the City and the lack of available land, the Council have had to make the difficult decision to dedesignate the Green Wedges and instead propose site allocations the Council is confident can be delivered in the Plan Period. A Green Wedge Topic paper has been submitted with the Local Plan, which sets out the justifications behind the de-designations of Green Wedges in line with the site assessment (Submission document TP/3, Section 4, pages 12-18).

The Council expects that mitigations for the impacts to the existing Green Wedge are included on all Green Wedge sites. This includes the enhancement of Green Infrastructure and maintaining some separation from existing Green Wedges in neighbouring authorities.

It is the Council's view that although the allocation of sites will dedesignate land from the Green Wedge, the significant number of new dwellings provided will have a larger strategic benefit to help meet housing needs.

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?**

This housing allocation is justified, effective and consistent with national policy. All sites have undergone a rigorous assessment before allocation which has been explained further in Part 2 of the 'Leicester Local Plan 2020 to 2036 Housing and Sites Topic Paper (2023)' (TP/5). All sites have been assessed through a Strategic Housing & Economic Land Availability Assessment (September 2022) (EB/HO/3), Sustainability Appraisal (SD/4 a-f) and overall site assessment process informed by appropriate evidence base. A summary of the key findings, including RAG ratings, are outlined in Submission Document SD/20 (Site Assessment Spreadsheet (2022)). The issues identified by this assessment have provided suggested mitigations, as above, which are outlined in the 'Strategic Sites Proposed for Allocation in the Draft Leicester Local Plan (2023)' (SD/18). To address these mitigations, the following technical documents have been received from the site promoter:

- Indicative land use masterplan
- Air Quality and Odour Technical Note
- Flood Risk Assessment
- Access Appraisal Note
- Utilities Services Diligence assessment
- And other reports

The Council feels confident that the documents received so far (in addition with other technical evidence received) and the reassurance given by the site promoter of the future pipeline of work are sufficient to demonstrate this site's deliverability. Some of the issues are more likely to be appropriately addressed at planning application stage, these include living conditions and pollution constraints and further revisions are expected.

Overall, the benefits proposed by the site and the contributions to meet housing needs has meant that the assessment process has been considered appropriate and compliant with the guidance in PPG (paragraph 61-002) for sufficient detail to be given to provide clarity to developers, local communities and other interested parties about the nature and scale of development. The allocation as a whole help to achieve the housing needs of the city.

b) **The relationship of the site to the existing settlements and its accessibility to local services and facilities?**

This site is well situated adjacent to existing dwellings in Glenfield to the north, existing employment at Braunstone Frith Industrial Estate to the south (with further employment opportunities at Optimus Point in Blaby), and existing shops/services in Ryder Road Local Centre. To the east. This site will act as an extension to existing developments in these areas and allow for integration with neighbouring existing uses. The opportunities with good access links and dwellings that integrate well into the existing fabric of nearby settlements.

The Council's site assessment process provides the distance of the sites from local services and facilities including bus stops, shops, GP facilities, schools etc, which is further explored in the Sustainability Appraisal (SD/4a-f).

Overall, the RAG ratings from officer assessment (SD/20) found that the site has poor access to employment, healthcare, a local centre and a school. However, the site benefits from being in close enough proximity to Ryder Road Local Centre and retail facilities in Glenfield, with a potential to include another shop within the development; Braunstone Frith Industrial Estate and Optimus Point are both nearby and provide employment opportunities; and the site has well connected bus and cycling routes to provide access to nearby schools and healthcare facilities. This acts as an extension to the existing urban area and would provide benefits for both the existing and proposed housing/employment area.

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]?**

As evidenced in 41a, a suite of technical evidence has been submitted to the Local Planning Authority to support this allocation's 'Developability'. This site is predicted to be delivered in the latter years of the plan Period and so has been classified as developable.

The NPPG (paragraph 007 and paragraph 029 of Housing supply and delivery PPG) and NPPF have formed the basis for demonstrating the deliverability and developability of all sites. The developability and subsequent evidence has been informed by regular engagement with the City Council's Development Team (through deliverability questionnaires and subsequent meetings) regarding site

developability issues and finds that this is still a suitable location for development. Landowner feedback been inputted into the trajectory, deliverability information and policy preparation at each stage of the Local Plan. EXAM 9 'Housing Allocations and Commitments - Deliverability & Developability' sets out the current anticipated delivery for the site. The technical evidence is satisfactory in respect of the development of the site within the Plan period, and this is in compliance with the definition of Developable in Annex 2 of the NPPF.

d) **Its viability, having regard to the provision of any infrastructure, affordable housing and other policy requirements?**

The site is viable. All policy requirements have been taken into account within the Viability Assessment. This viability has been carried out using calculations based on the 30% affordable housing requirement which includes first Homes. The Council have applied S106 contingencies above the existing land commitments for a secondary school at Ashton Green and existing obligations. Indicative development land value surplus would be sufficient for the Promoter to bring the Site forward for future development. A long-term development partner will lead on all aspects of planning and delivery on both housing and employment land to create a mixed-use development.

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?**

The site assessment process has considered all impacts to the historic environment including listed buildings, archaeology areas and Conservation areas inside the city and to neighbouring areas. The assessment carried out by internal specialists have acknowledged archaeology events through surveys below the site as well as a number of ridges and furrows. This has been further explored by the site promoter and the Council have received a draft Archaeology & Heritage Statement for this site, which the council is confident will adequately address issues of the development on heritage assets. Historic England have been consulted at each stage of the consultation process and the Council are continuing to engage with Historic England as part of DtC meetings since submission of Regulation 19 representations.

44. **Should the number of dwellings be set out as a minimum figure in**

the policy? For example, 'at least 412 homes...'

Policy as set is specified as 412 homes in accordance with previous masterplanning work undertaken by site promoters. This does not preclude developments coming forward for higher densities. However, to ensure that this is consistent with other policies and to allow for more flexibility in housing provision if things change, this will be rewritten to 'at least 412 homes' as a Main Modification.

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?

The addition of a Household Waste Recycling Centre to the Former Western Park Golf Course site was based on the need for increased waste recycling capacity in Leicester due to projected population growth for the years to 2036, and asset management and planning work undertaken by the City Council's Waste Team. However, more up-to-date evidence has since been received from the land promoter – please see letter from the land promoter which states the intention for the Household Waste Recycling Centre allocation to be amended to employment land. We propose this as a Main Modification to the plan.

46. Is the inclusion of a Household Waste Recycling Centre on this site compatible with the other uses proposed?

The Local Planning Authority believe that through masterplanning this use could be acceptable with other uses. However, as per the answer in question 44, the intention of the Council is to change this allocation to employment uses is a Main Modification.

47. When would the first planning application be anticipated for this site?

Expected that an outline or a hybrid planning application will be submitted to the Council around 2029.

48. Is the anticipated start date and build out rate realistic and justified?

The build out rates are justified. The site is planned to be built out within the plan period with enabling infrastructure starting from 2030/31. Build out rates have been calculated for all sites based on a balance of landowner questionnaires, developer panel feedback and officer judgement calculated using the SHELAA and further site assessment process. Furthermore, the Council has a proven track record of delivering housing on city council owned sites which has been demonstrated in sites such as development at Hamilton, Waterside and Abbey Meadows. This is further evidenced in

paras 4.25-4.34 of the Housing and Sites Topic paper (TP/5).

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?

The allocation is justified. The primary reasons for the Red RAG ratings in the SA are due to the impacts on the Green Wedge, allotments, archaeology, distance to water body and distance to train station. The full site assessment summary is included in Site Assessment Spreadsheet (2022) (SD/20). Mitigation measures include the requirement for an archaeological field evaluation, green infrastructure retention and improvements, improvements to nearby road networks and connections to schools through the creation of a new secondary school.

Whilst it is acknowledged allocation of site is a departure from the SA recommended RAG ratings, the overall benefits of housing, employment growth and a new school will have benefits to the wider community and provide investment in the improvement of connections to the city and surrounding neighborhood areas. This site allocation enhances the allocation in the 2014 Core Strategy, so allocation will encourage development in tandem with the existing allocation. Due to the limited land availability within Leicester's administrative boundaries and the fact that Leicester does not have a 5 Year Housing Land Supply, the Council have had to allocate some SA Red RAG rated sites to help meet the housing requirement. Technical reports that have been submitted to the Council have addressed some of these mitigations, the council is confident that this provides a larger strategic benefit despite the poor RAG rating.

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?

This housing allocation is justified, effective and consistent with national policy. All sites have undergone a rigorous assessment before allocation which has been explained further in Part 2 of the 'Leicester Local Plan 2020 to 2036 Housing and Sites Topic Paper (2023)' (TP/5). All sites have been assessed through a Strategic Housing & Economic Land Availability Assessment (September 2022) (EB/HO/3), Sustainability Appraisal (SD/4 a-f) and overall

site assessment process informed by appropriate evidence base. A summary of the key findings, including RAG ratings, are outlined in Submission Document SD/20 (Site Assessment Spreadsheet (2022)).

The issues identified by this assessment have provided suggested mitigations, as above, which are outlined in the 'Strategic Sites Proposed for Allocation in the Draft Leicester Local Plan (2023)' (SD/18). To address these mitigations, the following technical documents have been received from the site promoter:

- Indicative land use masterplan
- Landscape visual character assessment
- Topography plans
- Arboricultural Survey
- Stage 1 Ecology Report
- BNG Metrics Report
- Geo-environmental assessment
- Air Quality and Odour Technical Note
- Air quality assessment
- Flood Risk Assessment
- Access Appraisal Note
- Utilities Services Diligence assessment

The Council feels confident that the documents received so far (in addition with other technical evidence received) and the reassurance given by the site promoter of the future pipeline of work are sufficient to demonstrate this site's deliverability. Some of the issues are more likely to be appropriately addressed at planning application stage, these include living conditions and pollution constraints and further revisions are expected.

Overall, the benefits proposed by the site and the contributions to meet housing needs has meant that the assessment process has been considered appropriate and compliant with the guidance in PPG (paragraph 61-002) for sufficient detail to be given to provide clarity to developers, local communities and other interested parties about the nature and scale of development. The allocation as a whole help to achieve the housing needs of the city.

(b) The relationship of the site to the existing settlements and its accessibility to local services and facilities?

The site is a natural extension of the already approved and

partially delivered Ashton Green development, which was allocated as CS Policy 5 in Core Strategy (2014) and a key development priority for the Council. There is potential for development to be well coordinated with strategic site SL04 'Land to North of A46' including a potential link under the A46 to create well integrated and sustainable developments.

The Council's site assessment process has analysed the distance of the sites from local services and facilities including bus stops, shops, GP facilities, schools etc, which is further explored in the Sustainability Appraisal. The site performs poorly in terms of accessibility to a bus stop, town centre, healthcare facilities and rail stations.

However, it is found that the site is well connected to nearby facilities at the consented Centre at Ashton Green, employment to the south both proposed and current, as well as links to some facilities in Birstall and Thurstaston. It is close to a Mowmacre sports ground and Birstall golf course.

(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]?

As evidenced in 49a, a suite of technical evidence has been submitted to the Local Planning Authority to support this allocation's 'Developability'. This site is predicted to be delivered in the latter years of the plan Period and so has been classified as developable.

The NPPG (paragraph 007 and paragraph 029 of Housing supply and delivery PPG) and NPPF have formed the basis for demonstrating the deliverability and developability of all sites. The developability and subsequent evidence has been informed by regular engagement with the City Council's Development Team (through deliverability questionnaires and subsequent meetings) regarding site developability issues and finds that this is still a suitable location for development. Landowner feedback been inputted into the trajectory, deliverability information and policy preparation at each stage of the Local Plan. EXAM 9 'Housing Allocations and Commitments - Deliverability & Developability' sets out the current anticipated delivery for the site. The technical evidence is satisfactory in respect of the development of the site within the Plan period, and this is in compliance with the definition of Developable in Annex 2 of the NPPF

(d) Its viability, having regard to the provision of any infrastructure,

affordable housing, BNG and other policy requirements?

Yes, the site is viable. All policy requirements have been taken into account within the Viability Assessment which is broadly consistent with the assumptions set out in the Council's Whole Plan Viability Assessment (including CIL) May 2022 Refresh. Enabling site wide infrastructure will form part of the overall delivery strategy which will be part of the timescales for the development outputs/outcomes. The land has been gifted for the school to help meet the educational requirements of the site and nearby sites. This Viability Assessment has been carried out using calculations based on the 30% affordable housing requirement which includes first Homes and has been carried out using past trends for the consented Ashton Green development. Off site highways infrastructure improvements to be negotiated during the planning application process. BNG mitigations will be available primarily on site as evidenced in preliminary bio-diversity net gain (BNG) assessments. Employment site will be opened with highway and services infrastructure from the consented Ashton Green development to the west and predicted to produce good gross land values. The indicative development land value generates a surplus of above the Benchmark Lane Value demonstrating that the Site is financially viable for future development.

51. Should the number of dwellings be set out as a minimum figure in the policy?

Policy as set is specified as 670 homes in accordance with previous masterplanning undertaken by the landowners. However, to ensure that this is consistent with other policies and to allow for flexibility if capacities change, this will be rewritten to 'at least 670 homes' as a Main Modification.

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?

The Council has set out in appendix 4 what infrastructure is required to support all growth in the plan. The key infrastructure for this site has been identified as predominantly transport matters, which are set out within the transport part of the appendix (p.297). The Council are also committed to preparing a SPD post adoption providing further detail around infrastructure delivery.

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?**

The Council as landowner will be gifting a 6 ha site within the Land East of Ashton Green to the DfE for the delivery of a 1,200 place secondary school, so it is not expected that any contributions will be required.

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?**

Existing s106 contributions for education needs will be used to fund improvements to the existing Glebelands Primary School. Land is allocated within later phases of the masterplan for the consented Ashton Green development (20162453) for an additional primary school if required.

55. **When would the first planning application be anticipated for this site?**

An outline/hybrid planning application submission is expected around 2 years from Local Plan adoption, we anticipate that this should be around 2027/28.

56. **Is the anticipated start date and build out rate realistic and justified?**

The build out rates are justified. The build out rate for this site has been calculated using a balance of landowner feedback (from deliverability questionnaires received in 2022 and 2024 and ongoing meetings) and officer judgement (a mixture of past delivery trends analysis and developer panel feedback).

Furthermore, the Council has a proven track record of delivering housing on city council owned sites, including sites in Hamilton, previous phases of Ashton Green and Waterside. This is further evidenced in paras 4.25-4.34 of the Housing and Sites Topic paper (TP/5).

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?**

The allocation is justified. The main reasons behind this Red RAG rating in table 7.2 of the Sustainability Appraisal (SA) [SD/4] is that the site is a greenfield site, which would result in the loss of green wedge, concerns over distance to a waterbody and distance to the train station. Mitigations have been suggested for these issues and early stage work has been undertaken.

Whilst it is acknowledged allocation of site is a departure from the SA recommended RAG ratings, the overall benefits of housing will provide a significant contribution to the housing supply. Allocation of this site will form part of existing development with sensitive design. Due to the limited land availability within Leicester's administrative boundaries and the fact that Leicester does not have a 5 Year Housing Land Supply, the Council have had to consider seemingly unsustainable sites to help meet the housing requirement.

Technical reports that have been submitted to the Council have addressed some of the mitigations identified in the site assessment and SA. The council is confident that this provides a larger strategic benefit despite the poor RAG rating and will continue to work with site promoters to address any further constraints. Further to this, the development will be expected to consider the surrounding village of Thurcaston through sensitive design.

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?

This housing allocation is justified, effective and consistent with national policy. All sites have undergone a rigorous assessment before allocation which has been explained further in Part 2 of the 'Leicester Local Plan 2020 to 2036 Housing and Sites Topic Paper (2023)' (TP/5). All sites have been assessed through a Strategic Housing & Economic Land Availability Assessment (September 2022) (EB/HO/3), Sustainability Appraisal (SD/4 a-f) and overall site assessment process informed by appropriate evidence base. A summary of the key findings, including RAG ratings, are outlined in Submission Document SD/20 (Site Assessment Spreadsheet (2022)).

The issues identified by this assessment have provided suggested

mitigations, as above, which are outlined in the 'Strategic Sites Proposed for Allocation in the Draft Leicester Local Plan (2023)' (SD/18). To address these mitigations, the following technical documents have been received from the site promoter:

- Masterplan/ Opportunities Document
- Biodiversity Impact Appraisal
- Preliminary Ecology Appraisal
- Air Quality Constraints Report
- Surface Water Drainage Strategy
- Hydraulic Modelling Report
- Access plan
- Initial Transport Impact Assessment
- Transport Appraisal
- Archaeology
- And other reports

The Council is confident that the documents received so far (in addition with other technical evidence received) and the reassurance given by the site promoter of the future pipeline of work are sufficient to demonstrate this site's deliverability. Some of the issues are more likely to be appropriately addressed at planning application stage, these include living conditions and pollution constraints and further revisions are expected to the technical documents as necessary during the planning application process.

The Council have engaged with the site promoters through the landowner deliverability questionnaires around the requirement for infrastructure and impacts on delivery. Confirmation has been provided that no infrastructure is required in the short term that would impact on delivery of this site.

Overall, the benefits proposed by the site and the contributions to meet housing needs has meant that the assessment process has been considered appropriate and compliant with the guidance in PPG (paragraph 61-002) for sufficient detail to be given to provide clarity to developers, local communities and other interested parties about the nature and scale of development. The allocation as a whole helps to achieve the housing needs of the city.

(b). The relationship of the site to the existing settlements,

including Thurmaston, and its accessibility to local services and facilities?

The proposed site allocation is located on the northern edge of the administrative area of Leicester city on its boundary with Charnwood. To the south of the site is the A46, a dual carriage way northern ring road to the city which connects to the M1 motorway approximately 5 miles to the west, and runs between the edge of the existing urban area and the site. Some of the city's largest employment areas are in the north of the city. Beaumont Leys Town shopping centre in the north west of Leicester is to the south west of the site and is a 20-minute bus journey. There is an hourly bus service to Leicester, which takes about 40 mins to reach the city centre.

Thurmaston village provides a number of facilities and services including a pub, primary school, church, Memorial Hall and an electrical equipment/ repair shop. There is not a local convenience store, however Beaumont Leys Shopping Centre is within reasonable distance of the site via sustainable transport options.

The nearest secondary schools are Anstey Martin High School in Anstey, Brookvale Secondary school in Groby and Roundhill Academy at Syston. Beaumont Leys Secondary school and Rushey Mead Academy in the city. Anstey town centre is about 1.5 miles to the west and provides a full range of local facilities.

There are also footpaths that allow connectivity to the Ashton Green development, which will be within a reasonable walking distance of the proposed site.

(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]?

As evidenced in 57a, a suite of technical evidence has been submitted to the Local Planning Authority to support this allocation's 'Developability'. This site is predicted to be started in 2026/27 so this site is classified as 'deliverable' according to National Policy.

The NPPG (paragraph 007 and paragraph 029 of Housing supply and delivery PPG) and NPPF have formed the basis for demonstrating the deliverability and developability of all sites. The deliverability and subsequent evidence has been informed by regular engagement with the land promoters – Mather Jamie

(through deliverability questionnaires and subsequent meetings) regarding site developability issues and finds that this is still a suitable location for development. Landowner feedback been inputted into the trajectory, deliverability information and policy preparation at each stage of the Local Plan. EXAM 9 'Housing Allocations and Commitments - Deliverability & Developability' sets out the current anticipated delivery for the site. The technical evidence is satisfactory in respect of the development of the site within the Plan period, and this is in compliance with the definition of Developable in Annex 2 of the NPPF.

Statement of Common Grounds have been signed and agreed in relation to cross boundary matters between Charnwood Borough Council, Mather Jamie and Leicester City Council (SCG/6 - SoCG Land to the North of A46 (2023)) to help ensure that development is well coordinated and will be delivered sooner.

Further to this Mather Jamie are in the process of delivering a small site to the north of the allocated site within Charnwood, in line with Charnwood's Local Plan process. Pre-application advice has been sought from Leicester City Council in early 2024.

(d). Its viability, having regard to the provision of any infrastructure, affordable housing, BNG and other policy requirements?

A Statement of Common Ground has been prepared and published on the Examination webpage in relation to viability of this site and likely contributions to infrastructure. This can be seen under Submission document (SCG/8 - Viability SoCG Land to the North of A46 (2023)).

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 Thurstaston Conservation Area?

The Council has received the following technical documents:

- Masterplan/ Opportunities Document
- Archaeology

These documents consider the historic environment including the effects of the proposed development site on the heritage significance and setting of Thurstaston Conservation Area. These considerations influence the key principles set out in the Opportunities document

that will be used to guide the development of the site as more detailed proposals are considered in a planning application process. The Statement of Common Ground on cross boundary matters (SCG/6) also takes account of the historic environment, in which it is expected that any development would need to take account of the Thurstaston Conservation Area in the design.

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?

The Council has consulted the site promoters on the requirement for infrastructure and impacts on delivery. Confirmation has been provided that no infrastructure is required that would impact on delivery in the short term.

Other policies in the Plan set out the infrastructure requirements and it would be expected that this policy is read in conjunction with the rest of the Plan.

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?

Policy as set is specified as 420 homes in accordance with previous predicted development capacities including early stage masterplanning. However, to ensure that this is consistent with other policies, this will be rewritten to 'at least 420 homes'.

The council have acknowledged the capacities proposed by the site promoter recently as around 525 homes but have chosen to include this as a minimum requirement to allow for flexibility. Any capacity changes will be subject to further testing through the planning application process.

62. When would the first planning application be anticipated for this site?

Outline planning application is expected later in 2024/early 2025. Pre-application advice has been provided to Mather Jamie who are promoting the site

63. Is the anticipated start date and build out rate realistic and

justified?

The build out rates are justified. The build out rate for this site has been calculated using a balance of landowner feedback (from deliverability questionnaires received in 2022 and 2024 and ongoing meetings) and officer judgement (a mixture of past delivery trends analysis and developer panel feedback).

The landowner has extensive experience of delivering strategic developments over a range of different sites across the country.

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?

The allocation is justified. The primary reasons for the Red RAG ratings in the SA are due to the impacts on the Green Wedge and public transport options. The full site assessment summary is included in Site Assessment Spreadsheet (2022) (SD/20). Mitigation measures include the requirement for green infrastructure improvements and retention and improvements to nearby road networks.

Whilst it is acknowledged allocation of site is a departure from the SA recommended RAG ratings, the overall benefits of a large number of dwellings will significantly contribute to housing supply. This site allocation is between Anstey and Leicester City and acts as a natural extension of the recently built development off Glenfrith Way. Furthermore, the development will form part of a larger strategic site development with Charnwood and Blaby delivering around 780 homes. The three Councils are in agreement that development should be carried out in a coordinated and comprehensive direction.

Due to the limited land availability within Leicester's administrative boundaries and the fact that Leicester does not have a 5 Year Housing Land Supply, the Council have had to allocate some SA Red RAG rated sites to help meet the housing requirement. Technical reports that have been submitted to the Council have addressed some of these mitigations. The council is confident that this provides a larger strategic benefit despite the poor RAG rating.

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?

The housing allocation is justified, effective and consistent with national policy as all sites have undergone a rigorous assessment before allocation. All sites have been assessed through a Strategic Housing & Economic Land Availability Assessment (September 2022) (EB/HO/3), Sustainability Appraisal (SD/4 a-f) and overall site assessment process (a summary of which is included in SD/20: Site Assessment Spreadsheet (2022)).

The majority of issues that have been listed above have emerged from this site assessment process and suggested to be mitigated against in the 'Strategic Sites Proposed for Allocation in the Draft Leicester Local Plan (2023)' (SD/18). The following technical documents have been received in respect of these areas that the Council feels adequately addresses these issues (in addition with other technical evidence received):

- Indicative land use masterplan
- Ecological Impact Assessment
- Tree surveys
- Flood risk assessment
- Transport Assessment
- Promotional document
- And other reports

The remainder of these issues will be fully addressed during the planning application process, particularly issues such as living conditions and pollution controls. The allocation as a whole help to achieve the housing needs of the city.

Through both internal specialist and planning officer analysis, mitigations have been provided. The RAG ratings and summary of key issues/mitigations on the site are included in the strategic sites document (SD/18) and site assessments spreadsheet (SD/20).

(b) The relationship of the site to the existing settlements and its accessibility to local services and facilities?

The site allocation combines three separate parcels of land to form a natural extension of the existing residential estate served by Hallgate Drive and Lady Hay Road.

The Council's site assessment process has analysed the distance of the sites from local services and facilities including bus stops, shops, GP facilities, schools etc, which is further explored in the Sustainability Appraisal. Overall, the site is well connected to nearby facilities at Glenfield Hospital and to some services in Anstey.

(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]?

As evidenced in 64a, a suite of technical evidence has been submitted to the Local Planning Authority to support this allocation's 'Deliverability'. This site is predicted to be started in 2029/30 so this site is classified as 'deliverable' according to National Policy.

The NPPG (paragraph 007 and paragraph 029 of Housing supply and delivery PPG) and NPPF have formed the basis for demonstrating the deliverability and developability of all sites. The deliverability and subsequent evidence has been informed by regular engagement with the land promoters – NHS Hospitals Trust and David Wilson Homes (through deliverability questionnaires and subsequent meetings) regarding site developability issues and finds that this is still a suitable location for development. Landowner feedback been inputted into the trajectory, deliverability information and policy preparation at each stage of the Local Plan. EXAM 9 'Housing Allocations and Commitments - Deliverability & Developability' sets out the current anticipated delivery for the site. The technical evidence is satisfactory in respect of the development of the site within the Plan period, and this is in compliance with the definition of Developable in Annex 2 of the NPPF.

Further to this, the council have regularly engaged with any site development in Charnwood and Blaby, to ensure coordinated and comprehensive development.

A Statement of Common Ground has been signed and agreed in relation to cross boundary matters between Charnwood Borough Council, Blaby District Council, Leicester City Council, David Wilson Homes, NHS Hospital Trust and William Davis, which can be made available during the Examination process.

The landowner has a strong track record of delivery which includes delivery of sites at New Lubbersthorpe and Thorpebury. Pre-application advice is currently being sought by the land promoters with a view to provide this later in 2024.

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?**

As evidenced measures in question 64a highlight how the mitigation for the above are being addressed. The site is viable as demonstrated in the Viability SoCG which has been agreed between the Council and land promoters (SCG/7 - Viability SoCG Land to the West of Anstey Lane (2023)).

Furthermore, the whole plan viability assessment shows that greenfield sites are able to sustain at least 30% affordable housing along with all other policy requirements as set out in this plan.

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?**

The majority of the growth in Leicester is planned to be in the northern, western and central areas of the city. In 2020, the City Council was awarded £37M from the Government for a £71M project to deliver sustainable transport schemes primarily in the north and west of Leicester.

As of June 2024, this programme is almost complete. It consisted of 18 schemes which delivered 16km of cycleways, 1,763 metres of bus lane, 3 improved junctions, 1,259 bus stops with RTI and new totems, Smart ticketing with fare capping with the Leicester area, 15 new electric buses, and a new free city centre shuttle. Each of these schemes would have benefited the northern edge of Leicester.

In addition, a new bus station at St Margarets serving the north of Leicester is now open and 50% of the Leicester City bus fleet is now electric.

The modelling shows that there is likely to be increased traffic and congestion and some displacement of traffic from higher order roads.

Traffic levels overall could increase by around 2% and delays by 7% in the peak. Within the city, the majority of the impact will be in the north bounded by the A47 in the east and the A6 to the north. Where bus corridors are proposed to be introduced, then the reduced highways capacity could lead to increased delays on those links. Several junctions show signs of additional stress, but only A6/Abbey Park Road junction sees a large increase, but not enough to cause a severe impact.

Additional measures are proposed to be delivered in the period 2026 to 2031 which will continue to support the objectives of reducing the mode-share of car trips and increasing the number of sustainable trips.

68. Should the number of dwellings be set out as a minimum figure in the policy?

Policy as set is specified as 336 homes in accordance with previously predicted development capacities including early stage masterplanning. However, to ensure that this is consistent with other capacity policies, this will be rewritten to 'at least 336 homes'. The council have acknowledged the capacities proposed by the site promoter but have chosen to include this as a minimum requirement to allow for flexibility. Any capacity changes will be subject to further testing through the planning application process.

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?

The Council have set out in appendix 4 what infrastructure is required to support all growth in the plan. The key infrastructure for this site has been identified as predominantly transport matters which are set out within the transport part of the appendix (p.297). The Council are also committed to preparing a SPD post adoption providing further detail around infrastructure delivery.

70. When would the first planning application be anticipated for this site?

A planning application is expected later in 2024. Since the submission of EXAM 9 it has been confirmed that this will be for a full planning application. A request for pre-application advice was submitted to the LPA in May 2024 and is currently being processed. This includes a covering letter and associated plans.

71. Is the anticipated start date and build out rate realistic and justified?

The build out rates are justified. Build out rates have been calculated for all sites based on a balance of landowner questionnaires, developer panel feedback and officer judgement. The site promoter has a successful track

record of delivering housing in Leicester and Leicestershire, which is outlined in the Viability Statement of Common Ground for this site (SCG/7). The Council are working with site promoters to ensure that the site can be delivered, incorporating a coordinated and comprehensive approach to development with the allocation in Charnwood and the land in Blaby.

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?

The reasons that this strategic site scores an Amber RAG rating in the Sustainability Appraisal (SA) [SD/4] are that it is a greenfield site that would result in the loss of open space and sports provision and does not have access to allotments. There are also concerns of distance to a waterbody and distance to the train station. Mitigation measures have been suggested for this site.

Due to the limited land availability within Leicester's administrative boundaries and the fact that Leicester does not have a 5 Year Housing Land Supply, the Council has had to make some difficult decisions in allocating sites. Whilst it is acknowledged this site has a red RAG rating in the sustainability appraisal, the overall benefits of providing sites to meet the city's housing and employment need will have benefits to the wider community and provide investment to improve connections to the city and surrounding neighborhood areas.

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?

The council is doing all it can to meet its employment land & Gypsy & Traveller needs in the city due to the constraints of Leicester's available land. Part of the site is to be retained as open space (more than 40% of the site to be retained for open space).

b). The accessibility of the site by sustainable modes of transport?

Technical studies have been undertaken by the site promoters. This

includes consideration of site access, including how accessible the site is by sustainable modes of transport. The site benefits from being in close proximity of Beaumont Leys shopping centre, as well as a number of local residential areas, which collectively provide excellent access to local bus services. There is also good access to an extensive network of pedestrian and cyclist facilities.

c). **The effects of the proposed uses on:**

- **ecology and biodiversity?**

Technical studies have been undertaken by the site promoters. They identify key ecological constraints within the site. The emerging development proposals for the site are modest and reflect the ecological constraints. Less than 40% of the total site area is to be allocated for development. Mitigations have been proposed based on the site constraints and the development proposals provide an opportunity for biodiversity net gain across the wider Beaumont Park.

- **the safety and operation of the highway network?**

Technical studies have been undertaken by the site promoters. The technical work demonstrates that safe and suitable access to the site can be achieved by all users and that any significant impacts from the development on the transport network (in terms of capacity and congestion) or on highway safety, can be cost effectively mitigated.

Colleagues from highways helped to inform the site selection process for Gypsy and Traveller provision. It is considered that safe access to the site could be established and that the safety and operation of the highway network would not be an issue that would rule out transit provision on this site.

- **air quality?**

A technical note was commissioned by the site promoters which considered the implications of air quality and odour on the development proposals. The site is located adjacent to a number of potential odour sources. However, it is considered unlikely that odour will significantly influence the site.

- **the amenity of the surrounding land uses?**

Uses that are adjacent to the site include the established Bursom (Leycroft Road) industrial estate (to the east), Beaumont Shopping Centre and other leisure and community uses (to the west) and Leicester Speedway to the north of the site. Less than 40% of the current Beaumont Park area would be developed. The undeveloped

area of the park would remain as park land. There are also residential uses in the vicinity of the but these are not adjoining the site and are to the south of the site beyond Krefeld way and to the north east of the site. It is not thought that the amenity of the adjacent uses would be significantly impacted by the proposed employment and gypsy and traveller uses. Master Planning for the site will help to reduce the impact of the proposed uses on the amenity of the remaining parkland.

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?**

The Council as land promoter through a future development partner will be able to mitigate against the historical land contamination issue to create a hard surfaced environment within the employment land zones, suitable for G & T provision with a design of hard landscaping comparable with similar sites within the city.

b). **Its proximity to existing Gypsy and Traveller accommodation sites at Greengate Nook and Red Hill?**

The proposed gypsy and traveller transit site on Beaumont Park would be approximately 1.3 miles from the permanent gypsy and traveller site at Greengate Nook and 1 mile from the permanent site at Redhill. When the site selection assessments for gypsy and traveller transit sites (EB/HO/2b) were undertaken, the Council sought advice from the Leicester and Leicestershire Multi Agency Traveller Unit (MATU) and Housing colleagues. They are responsible for managing gypsy and traveller sites and have vast experience of liaising and working with this community. Although, the sites would be relatively close to each other, no concern was expressed that this would be problematic from an operational point of view.

c). **Noise and air quality issues arising from the adjacent highway network and motorsport events at the Beaumont Park Stadium?**

There will inevitably be noise generated from motorsport events at Beaumont Park Stadium. Leicester Speedway was granted consent in 2009. Conditions are attached to the consent, which restrict the hours that the speedway track

and stand can operate and the number of events that can be held in a year.

The proposed gypsy and traveller use on Beaumont Park is a transit site. Whilst it is residential in nature it provides temporary short-term accommodation for residents. There would be scope when locating and designing the site to consider landscaping, buffers and other mitigation measures to help reduce the impact of noise from the Beaumont Park Stadium and highway network and also air quality. Having good access to the highway network is an important factor in selecting suitable transit sites.

d). **The compatibility of a residential use with the existing and proposed employment uses?**

The Council considers that the residential use is compatible with the existing and proposed employment uses. There will be scope when undertaking the master planning of the site to consider things such as the location and design of the residential transit site, along with appropriate mitigation measures. This will ensure that the residential and both existing and proposed employment uses can coexist alongside each other with minimal amount of disruption to either use.

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?**

This has been informed by masterplanning. This is a strategic policy which sets out the key considerations for the site, the layout will be shared as part of further planning applications. The remainder of the site will be retained and enhanced as open space. The council will consider modifications to the policy to include masterplanning.

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?**

The Council proposes acknowledges that currently the policy might not adequately address this and will consider a modification to address this.

Please ask for: Matt Wallace

[REDACTED]

[REDACTED]

Our ref: Site 702

Your Ref:

Date: 23 September 2024

Mr G Butterworth
Head of Planning
Leicester City Council
City Hall
115 Charles Street
Leicester LE1 1FZ



Dear Grant,

Leicester Local Plan 2020 – 2036: Policy SL02 – Former Western Park Golf Course

Further to discussions with your Planning Policy officers, I write with reference to the proposed land allocation for a Household Waste Recycling Centre (HWRC) within the land promotion of the above site.

I now confirm that the Council's immediate requirement for a replacement HWRC within the city has fallen away and that as landowner promoter of the site, we are no longer seeking a specific land use allocation within the proposed 10.75 ha of employment land uses.

Should a future need for a new HWRC arise then this would be dealt with through a specific planning application post adoption of the Leicester Local Plan.

Yours sincerely

[REDACTED]

Matthew Wallace

Director of Estates and Building Services