

Examination of the Leicester Local Plan 2020-2036

MATTERS, ISSUES AND QUESTIONS FOR THE EXAMINATION (MIQs)

Response from HBF, September 2024

Please note, these comments are in addition to our Regulation 19 comments, which we have not repeated here. We have referred to our Reg 19 comments where we have expanded our comments or provided additional comments, but only where we believe this is helpful.

We have not responded to all of the questions only those where we have further comments to make. Our original Reg 19 comments still stand.

MATTER 19 – MONITORING

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

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

As mentioned in our Reg 19 response HBF believe more detail is needed about the Housing Trajectory in order for it to be effectively monitored. If the council is looking to reply on development outside of its boundaries to meet its need, it clearly needs to monitor the development of both the policy and new housing to ensure this occurs.

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

Monitoring is an important part of the plan. If monitoring shows the Council is not delivering the housing needed the Council should be required to take action to address this under supply. HBF would suggest explicit reference is made to the actions that the LPA can and would take in the case of under-delivery. HBF do not support the inclusion of policies within a Local Plan that merely triggers a review of the Local Plan if monitoring shows housing delivery is not occurring as expected. Such a policy, on its own, does nothing to address the housing crisis or undersupply of homes. There are other more effective and immediate measures that could be introduced into policy that would enable the Council to address housing under deliver, much more quickly than would be possible through the production of another plan, or plan review.

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

HBF share the concern that policy should be included in the local plan. The role of the SPD should be to provide advice and guidance on the interpretation of policy and not to set policies. Policies in the plan should be subject to the whole plan viability appraisal. Without a clear understanding on the expectations for developer contributions at this stage, how can a plan be assessed to be sound, deliverable and viable.