

MATTER 3 – HOUSING

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

Housing Land Supply

Policy Ho01 – Non-Strategic Housing Allocations

General Questions

77. Is Policy Ho01 effective, given that the housing allocations are not set out in the policy but listed in Appendix 6?

Yes. The policy is effective as it stands. The policy applies a similar approach to what was previously used in the Core Strategy (2014) and the previous Local Plan (2006) which has been effective in decision making. However, the Council considers that there is some merit in a main modification which would include the full list of site allocations (Appendix 6) within the policy.

78. To ensure that the implementation of Policy Ho01 is robust and clear for decision makers, should the site specific constraints and proposed mitigations set out in the Non-Strategic Sites Proposed for Allocation in the Draft Leicester Local Plan (2023) [SD/19] be included within the Plan?

The policy makes reference in criterion (f) to the Non-strategic Site Allocations Document which contains the detail on site specific constraints and proposed mitigations. This document forms part of the policy and is to be considered as material consideration for determination of applications. This is done to keep the plan simple and succinct. The council thinks that Policy Ho01 is robust and effective.

79. Was the methodology used to assess and select the proposed site allocations, as set out in the Housing Sites Methodology report [EB/HO/5] robust and appropriate? Are the reasons for selecting the preferred sites and rejecting others clear and where is this set out?

Yes. The council is of the opinion that this is a robust and appropriate method for assessing the sites. Part 2 of the topic paper 'Leicester Local Plan 2020 to 2036 Housing and Sites Topic Paper (2023)' (TP/5) clearly explains the process undertaken to assess the

sites. The assessment considered a full range of sites and involved input from various internal and external specialists e.g. Nature Conservation, Highways, Flooding. The assessment of all suitable sites has also been conducted via the Sustainability Appraisal which also explored any alternative methodology for assessing sites, deeming this an appropriate method.

In selecting sites, the Council was mindful that viability across some parts of the site is challenging so the site selection process was informed by the Whole Plan Viability Assessment (having regard to the typologies), and discussions with landowners, and development management officers. Where the more challenging sites are included, a cautious approach has been taken, and it is assumed they will come forward in the later parts of the plan period.

80. How was the historic environment considered in the process for the assessment and selection of the Non-Strategic Housing Allocations? Where is that evidence set out in the supporting evidence base?

Each site was assessed for suitability of allocation based on impacts to all aspects of the Historic Environment by both the city archaeologist and building conservation officers. Further to this, Historic England and local Conservation Area societies have been consulted at each stage of the consultation process. The Council have held numerous DtC meetings with Historic England to address any issues raised in representations. The 'Site Assessment Spreadsheet (2022)' (SD/20) takes account of key impacts to the Historic Environment where appropriate and mitigations suggested in the 'Non-Strategic Sites Proposed for Allocation in the Draft Leicester Local Plan (2023) [SD/19]' document.

81. Are the non-strategic housing allocations deliverable and/or developable in accordance with the timelines set out in the housing trajectory? In particular, are they:

a). confirmed by the landowner involved as being available for the development proposed?

Yes. The majority of non-strategic site allocations are owned by the Council and the realism of their development been confirmed internally through extensive ongoing work. The Council have engaged with all landowners including private landowners as part of the SHELAA process. The Council have applied robust assumptions where necessary based on previous responses through call for sites, consultations and other

stakeholder engagement.

b). **supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?**

Yes. All sites have been assessed by LCC Highways Authority to ensure that safe and appropriate access can be achieved. Mitigation has been suggested where development may significantly impact on movements around a site or where accessibility improvements are needed. The council is confident that safe and appropriate access can be achieved on all sites taking account of the identified highways issues.

c). **deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?**

Yes. The Council have engaged with landowners through deliverability questionnaires over the needs for infrastructure, services and any other environmental constraints. Given the size of these sites and in line with the infrastructure study, it is not expected that any significant additional infrastructure will be required that would prevent the sites from being delivered in the Plan Period.

82. Are there any updates to the information contained in the Housing Allocations & Commitments - Deliverability and Developability schedule [EXAM 9] on the delivery status of any of the non-strategic housing allocations?

For the most part, no. At this stage, the only amendments to be made are to sites which received planning permission after submission of the Plan or have received confirmation from the landowners that the site is no longer available. These amendments will be made through main modifications.

Site number	Site name	Regulation 19 site capacity	Update to be made
15	Land to south of St Augustine Road / west of Duns Lane	349 dwellings	Update to capacity in line with planning approval on site (20221898) and taking account of student formula.
488	Carter	30 dwellings	Removal of site from

	Street/Weymouth Street/Bardolph Street East		allocations
963	Southfields Infant School and Newry Specialist Learning Centre	53 dwellings	Update to capacity in line with planning approval on site (20220960)
1035	VRRE/Gipsy Lane	12 dwellings	Removal of site from allocations

The Council does not anticipate any further revisions at this point but will update the Inspectors as necessary during the course of the Examination.

Appendix 6 Sites - Inner and South Areas

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

83. How will the development site integrate with the existing businesses, particularly in terms of ensuring that residential use does not have a detrimental effect on employment/economic development?

The site allocation is a mixed-use development for employment and residential, which was one of the designated Proposed Development Areas in the 2006 Local Plan (Saved Local Plan Policy PS09a). The impacts of residential development have already been tested through the approved planning permission (20221898). The site is at the edge of the Central Development Area and is in an area that is already a mix of both residential and other uses making integration possible as demonstrated. Any further planning applications coming forward would be expected to address residential development impacts through design and layout, in line with policy DQP01 and DQP06.

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

The adverse impacts of developing the outlined site are summarised in the 'Suitability summary' of the non-strategic sites document (SD/19) and have been assessed through the Sustainability Appraisal (SD/4) and the sites allocation process, as identified in Submission Document TP/5. The non-strategic sites document also includes suggested mitigation for each site.

The criteria of relevant Plan policies will be applied to the site

allocations. For example, in relation to biodiversity, heritage assets, flood risk, and pollution risks the relevant policies will be applied in assessing future applications.

For this site, application 20221898 has provided the necessary information to help validate and have the application approved, including Flood Risk Assessments and Heritage Impact Assessments to address mitigations on the site.

The Council is confident that the Local Plan's policy safeguards and proposed mitigations are sufficiently effective to enable the allocation to be delivered within the Plan period.

85. Would this site allocation enable a positive approach to the use and supply of renewable and low carbon energy and heat as set out in paragraph 155 of the NPPF?

Yes, any development on this site allocation is expected to meet the criteria of the Plan's policies on the use and supply of renewable and low carbon energy, i.e., Policy CCFR01 'Sustainable Design & Construction', CCFR02 'Whole Life-Cycle Carbon Emissions, Policy CCFR03 'Energy Statement', and Policy CCFR04 'Low Carbon Heating and Cooling'.

There is an existing permission for part of the site (Planning Application No. 20221898) which was accompanied by an Energy & Sustainability Strategy Report. This details measures for renewable and low carbon energy as well as heat use and supply for the development, including a central Air Source Heat Pump heating and hot water system, and a PV array. It is considered that these measures mean the permitted development on the site is in line with the positive approach to the use and supply of renewable and low carbon energy and heat set out in paragraph 155 of the NPPF.

Site 222: Evington Valley Road (Former Dunlop Works)

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

The adverse impacts of developing the outlined site are summarised in the 'Suitability summary' of the non-strategic sites document (SD/19) and have been assessed through the Sustainability Appraisal (SD/4)

and the sites allocation process, as identified in Submission Document TP/5. The non-strategic sites document also includes suggested mitigation for each site.

The criteria of relevant Plan policies will be applied to the site allocations. For example, in relation to biodiversity, heritage assets, flood risk, and pollution risks the relevant policies will be applied in assessing future applications.

The Council is confident that the Local Plan's policy safeguards and proposed mitigations are sufficiently effective to enable the allocation to be delivered within the Plan period.

Site 240: 114-116 Western Road

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

The adverse impacts of developing the outlined site are summarised in the 'Suitability summary' of the non-strategic sites document (SD/19) and have been assessed through the Sustainability Appraisal (SD/4) and the sites allocation process, as identified in Submission Document TP/5. The non-strategic sites document also includes suggested mitigation for each site.

The criteria of relevant Plan policies will be applied to the site allocations. For example, in relation to biodiversity, heritage assets, flood risk, and pollution risks the relevant policies will be applied in assessing future applications.

The Council is confident that the Local Plan's policy safeguards and proposed mitigations are sufficiently effective to enable the allocation to be delivered within the Plan period.

Site 335: Manor House Playing Fields – Narborough Road

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

The adverse impacts of developing the outlined site are summarised in the 'Suitability summary' of the Non-strategic sites document (SD/19)

and have been assessed through the Sustainability Appraisal (SD/4) and the sites allocation process, as identified in Submission Document TP/5. The non-strategic sites document also includes suggested mitigation for each site.

The criteria of relevant Plan policies will be applied to the site allocations. For example, in relation to biodiversity, heritage assets, flood risk, and pollution risks the relevant policies will be applied in assessing future applications.

The Council is confident that the Local Plan's policy safeguards and proposed mitigations are sufficiently effective to enable the allocation to be delivered within the Plan period.

Site 626: Neston Gardens green space/Mud Dumps

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

We would expect that any development of the site would retain the existing pedestrian route and that the design and layout would contribute to a vibrant and safe public realm by providing natural surveillance in line with policy DQP01, as well as promote healthy, inclusive, and safe places in conformity with the criteria set out in the Local Plan's Health and Wellbeing policies. A green buffer and screening along the railway would be expected to provide safety and mitigate adverse health impacts.

Site 647: Ranworth Open Space

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

We would expect that any development of the site would retain existing pedestrian routes and that the design and layout would contribute to a vibrant and safe public realm by providing natural surveillance in line with policy DQP01, as well as promote healthy, inclusive, and safe places in conformity with the criteria set out in the Local Plan's Health and Wellbeing policies. Alternative open space is available nearby at Ingold Avenue Open Space (Site 557), which is proposed for partial development only, with the remaining open space to be enhanced.

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

delivered in the Plan period?

The adverse impacts of developing the outlined site are summarised in the 'Suitability summary' of the Non-strategic sites document (SD/19) and have been assessed through the Sustainability Appraisal (SD/4) and the sites allocation process, as identified in Submission Document TP/5. The non-strategic sites document also includes suggested mitigation for each site.

The criteria of relevant Plan policies will be applied to the site allocations. For example, in relation to biodiversity, heritage assets, flood risk; and pollution risks the relevant policies will be applied in assessing future applications.

The Council is confident that the Local Plan's policy safeguards and proposed mitigations are sufficiently effective to enable the allocation to be delivered within the Plan period.

Site 669: Spendlow Gardens

92. This allocation does not appear to be listed in Appendix B of the 'Sustainability appraisal of the draft Leicester local plan'. Has this site been considered within the Sustainability Appraisal and if 'yes' what was the outcome of this process, or if 'no' why was it excluded?

Yes, this has already been considered in the Sustainability Appraisal (SD/4). The outcome of the process is fully addressed within the updated Sustainability Appraisal document¹.

93. What are the potential adverse impacts of developing the site and how could these be mitigated in terms of: biodiversity; and loss of open space. Would policy safeguards and proposed mitigation be sufficiently effective to enable the allocation to be delivered in the Plan period?

The adverse impacts of developing the outlined site are summarised in the 'Suitability summary' of the Non-strategic sites document (SD/19) and have been assessed through the Sustainability Appraisal (SD/4) and the sites allocation process, as identified in Submission Document TP/5. The non-strategic sites document also includes suggested mitigation for each site.

¹ The update relates to minor alterations following a review of the SA subsequent to Submission of the plan to Secretary of State. None of the alterations affect the substance of the document or the plan.

The criteria of relevant Plan policies will be applied to the site allocations. For example, in relation to biodiversity, heritage assets, flood risk; and pollution risks the relevant policies will be applied in assessing future applications.

The Council is confident that the Local Plan's policy safeguards and proposed mitigations are sufficiently effective to enable the allocation to be delivered within the Plan period.

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

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

Yes, the site is appropriate for the general residential development proposed within the allocation as the site constraints have been identified and the need for mitigations has been established. The allocation is deliverable. The Council has had ongoing engagement (Apps 20213096, 20220843), with the site promoters to deliver this site, which we are confident will be completed within the Plan period. Extensive engagement between the Council and the site promoters have clarified that a sensitive design could allow for all mitigations to be addressed. Only 0.15 ha of the total site area is to be developed for residential uses, the rest of the site (0.75 ha) is to be retained and enhanced as open space.

Site 961: Welford Road Playing Fields

95. What are the potential adverse impacts of developing the site and how could these be mitigated in terms of: biodiversity; highway capacity; pollution; flooding; and loss of open space/playing fields/Green Wedge. Would policy safeguards and proposed mitigation be sufficiently effective to enable the allocation to be delivered in the Plan period?

The adverse impacts of developing the outlined site are summarised in the 'Suitability summary' of the Non-strategic sites document (SD/19) and have been assessed through the Sustainability Appraisal (SD/4) and the sites allocation process, as identified in Submission Document TP/5. The non-strategic sites document also includes suggested mitigation for each site.

The criteria of relevant Plan policies will be applied to the site allocations. For example, in relation to biodiversity, heritage assets, flood risk; and pollution risks the relevant policies will be applied in

assessing future applications.

Through de-designating this land from the green wedge and allocating it in the Plan, it is intended to open up the eastern part of the site for use as community playing fields. Currently, this land is not publicly accessible. Therefore, on balance, the benefits to the community of allocation outweighs its retention within the green wedge.

The Council is confident that the Local Plan's policy safeguards and proposed mitigations are sufficiently effective to enable the allocation to be delivered within the Plan period.

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

Only 0.5Ha of the site are to be developed and the rest is to be retained and enhanced as playing fields. This will allow for connection with neighbouring open spaces. We would expect that any development of the site would retain and enhance existing pedestrian routes and that the design and layout would contribute to a vibrant and safe public realm by providing natural surveillance in line with policy DQP01, as well as promote healthy, inclusive, and safe places in conformity with the criteria set out in the Local Plan's Health and Wellbeing policies.

Site 1030: Land to the west of Dysart Way

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

Yes, the allocation is justified and appropriate having regard to its current use as open space in a ward and OSSR area with deficiency as the space was not considered as part of the OSSR Study (2017) (EB/OS/3) due to not falling within any of the open space typologies examined. The site has limited recreational value. There are no paths through it and its long narrow shape limits the possibility of its use for informal sports. The site's current primary value is in providing a green buffer along Dysart Way. Any development of the site will be expected to consider the existing mature trees and their retention, if possible, as well as the creation of a replacement green buffer along Dysart Way. Development will also be expected to meet the criteria for open space in new development set by Policy OSSR03. Any outstanding need for contributions towards open space provision arising from the development will be secured by planning condition and/or planning

obligation in line with Policy DI01.

Site 1039: Bisley Street / Western Road

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

Yes, the site was considered to be no longer in viable B-use class by the EDNA (2020) [EB/EM/1]. The landowners have provided information confirming that this could be developed for residential development, so a decision was taken to include this in the plan. Due to the uncertainties, it is assumed that this site will not come forward in the early years of the plan-period.

The sites have been assessed through the Whole Plan Viability Assessment (Submission Document EB/DI/3) and any planning applications coming forward would be expected to provide viability assessments and contamination assessments.

Site 1051: Gilmorton Community Rooms/Hopyard Close Shops

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

The site allocation is proposed to be amended to a mixed-use allocation as part of Main Modifications (MM43) [EXAM 8] which will facilitate regeneration of the existing community facilities on the site as well as providing dwellings. The existing community facilities on the site are of lower quality and would benefit from enhancement.

We would expect that the design and layout of any development of the site would contribute to a vibrant and safe public realm in line with policy DQP01, as well as promote healthy, inclusive, and safe places in conformity with the criteria set out in the Local Plan's Health and Wellbeing policies.

Appendix 6 Sites – North East and South East Areas

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

The North East and South East currently have sufficient overall open space against their required provision as identified by the Open Space, Sport and Recreation Study (2017) [EB/OS/3]. It is acknowledged that development of sites in these areas will create additional demand, but policies including OSSR03 will ensure that this demand is met either through on-site open space provision or improvements to existing OSSR facilities in the local area. Some sites in the North East and South East are allocated for partial development, in recognition of the need for open space in those localities while also meeting as much of the City's housing need as possible.

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

101. Is the allocation of this former allotments site for 53 dwellings justified and appropriate, having regard to the access constraints adjacent to the entrance to a primary school, the presence of mature trees along the route of the proposed access and the biodiversity value of the former allotment site?

The adverse impacts of developing the outlined site are summarised in the 'Suitability summary' of the Non-strategic sites document. This document also includes suggested mitigations for each site.

The criteria of relevant Plan policies will be applied to the site allocations. For example, in relation to the access constraints adjacent to the entrance to a primary school, the presence of mature trees along the route of the proposed access and the biodiversity value the relevant policies will be applied in assessing future applications.

Access constraints can be overcome through improvements to Wyvern Avenue to provide an adoptable access road. This has been confirmed by the city's highways authority. A transport statement would be required for any forthcoming application.

The biodiversity value of the site is appreciated. An assessment of the site has been undertaken by the city's nature conservation team and has been considered as part of the overall site assessment. It is intended that any adverse impact on the biodiversity value of the site will be minimised as will the loss of mature trees. Furthermore, national planning policy and legislation require that any biodiversity loss will be compensated for and that a minimum 10% biodiversity net gain will be achieved.

102. Are the anticipated start date of 2031/32 and the expected build out rates of 27 dwellings in 2031/32 and 26 dwellings in 2032/33 set out in EXAM 9 realistic and achievable, given that

options for delivery have still to be explored?

Yes. The anticipated start date and build out rates are realistic and achievable as options for delivery of the site are currently being explored by the Council's Housing Team. Initial scoping work on this site, alongside the Plan's other non-strategic sites, is currently being undertaken. The site is on Council-owned land, which reduces the number of third parties involved in the development process. The anticipated start date is in the latter part of the Plan period to take account of potential difficulties around access and biodiversity constraints.

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

103. Does the residential capacity of 40 new dwellings on Site 307 take into account the loss of existing dwellings on the site? Would the result be a net increase or decrease in dwelling numbers?

The residential capacity of 40 new dwellings does not take account of the loss of existing dwellings. It is calculated by applying the housing density target of 35 dwellings per hectare (per Policy Ho05). The site was formerly used as university halls of residence until several years ago, since which time the site has been vacant. The halls housed 360 student bedspaces, which equates to 144 dwellings when the adjustment for student accommodation is applied. Therefore, the residential capacity would result in a net decrease. However, the indicated capacity is a minimum figure and does not preclude an application for a greater number of dwellings from coming forward and being approved. Indeed, there is a current planning application (Planning Application No. 20241345) for the site for 94 retirement apartments which is pending a decision.

104. How has the site's location within the Stoneygate Conservation Area and within the setting of nearby listed buildings informed the dwelling capacity and density of Site 307?

All sites outside of the CDA have applied a 35 dwelling per hectare density which is an increase on the 30 dwelling per hectare density applied in the draft Plan at Regulation 18 stage. This is a standardised approach. Any application for development of the site will be expected to include a Heritage Impact Assessment and the Council's building conservation colleagues will be consulted.

105. Given that a full planning application is not expected until mid-late 2024, and the need for demolition and clearance of the existing buildings on site, is it realistic for house building to start in 2024/25 and the site to be completed in 2027, as set out in EXAM 9?

Yes. This is based on previously deliverability information that has been received. A planning application is currently active on site for demolition and construction of new dwellings. A start on site may go beyond 2024/25 but it is not expected that this will impact on completion timeframes.

Site 481: Brent Knowle Gardens

106. Is the allocation of Brent Knowle Gardens for housing development of 12 dwellings justified and appropriate, having regard to its significant visual amenity value within the surrounding residential area and its use as informal open space, within an area which is deficient in open space?

The site is allocated for partial development to enable retention and enhancement of rest of site as open space. Whilst the ward is deficient in open space, it lies within a wider OSSR study area (north-east) which has sufficient supply in overall open space. Importantly, the site is within reasonably accessible distance of Willowbrook Open Space which is a large open space with a lot of facilities.

107. How will this allocation and the loss of open space that would result help to promote healthy, inclusive and safe places, as set out in paragraph 92 of the NPPF?

The site is for partial development only, with the remainder to be retained and enhanced as open space. Development will also be expected to meet the criteria for open space in new development set by Policy OSSR03. Any outstanding need for contributions towards open space provision arising from the development will be secured by planning condition and/or planning obligation in line with Policy DI01. Design and layout of development will be expected to contribute to a vibrant and safe public realm in line with Policy DQP01, as well as promote healthy, inclusive, and safe places in conformity with the criteria set out in the Local Plan's Health and Wellbeing policies.

108. Is the expected date of 2027 for a planning application to be

submitted and an anticipated start date of 2028/29, as set out in EXAM 9, realistic and achievable, given that options for the delivery of the site have still to be explored?

Yes. The expected date for a planning application to be submitted and the anticipated start date are realistic and achievable as the options for delivery of the site are currently being explored by the Council. Initial scoping work on this site, alongside the Plan's other non-strategic sites, is currently being undertaken. The site is on Council-owned land, which helps reduce the number of third parties involved in the development process. There are relatively few constraints on the site, which primarily relate to the loss of open space. These constraints can be overcome through the partial retention of open space as part of the development and the design and layout of the development, as well as through meeting BNG requirements.

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

109. Given that Site 488 is in multiple ownership, with active employment uses operating from the premises on site, and an objection to housing from one of the landowners, is the continued allocation of this site for housing justified and realistic?

The whole site is proposed to be removed from the site allocations as a main modification due to the landowners confirming that it is no longer to be considered as available.

110. What is the nature and extent of the other constraints on Site 488, as summarised in the Non-Strategic Sites Proposed for Allocation in the Draft Leicester Local Plan (2023) [SD/19], including the Children's and Young People's Space, flood risk, easement and heritage impacts?

N/A – see answer to q. 109

111. How would the proposed modification to reduce the site area and the allocation to 19 dwellings effectively address the known constraints?

N/A – See answer q. 109.

Site 501: Croyland Green

112. Is the allocation of Croyland Green for housing development of 9 dwellings justified and appropriate,

having regard to its visual amenity value within surrounding housing estate and its use as informal open space, within an area which is deficient in open space?

Yes, the allocation is justified and appropriate as the site is allocated for partial development to enable retention and enhancement of the rest of site as open space. While the ward is deficient in open space, the wider OSSR study area (north-east) has sufficient supply in overall open space. The site is within reasonably accessible distance of Willowbrook Open Space which is a large open space with a lot of facilities.

113. How will this allocation and the loss of open space that would result help to promote healthy, inclusive and safe places, as set out in paragraph 92 of the NPPF?

The site is for partial development only, with the remainder to be retained and enhanced as open space. Development will also be expected to meet the criteria for open space in new development set by Policy OSSR03. Any outstanding need for contributions towards open space provision arising from the development will be secured by planning condition and/or planning obligation in line with Policy DI01. The design and layout of development will be expected to contribute to a vibrant and safe public realm in line with policy DQP01, as well as promote healthy, inclusive, and safe places in conformity with the criteria set out in the Local Plan's Health and Wellbeing policies.

114. Is the expected date of 2028 for a planning application to be submitted and an anticipated start date of 2028/29, as set out in EXAM 9, realistic and achievable, given that options for the delivery of the site have still to be explored?

Yes. The expected date for a planning application to be submitted and the anticipated start date are realistic and achievable as the allocation is a small site which is not heavily constrained and is only proposed for partial development. The site is on Council-owned land, which reduces the number of third parties involved in the development process. Options for delivery of the site are currently being explored by the Council. Initial scoping work on this site, alongside the Plan's other non-strategic sites, is currently being undertaken.

Site 559: Judgemeadow Community College Playing Fields

115. Is the allocation of Site 559 for housing development of 13 dwellings justified and appropriate, having regard to its current role as part of a school playing field and open space within a Green Wedge, the purposes of which in Policy OSSR01 are to provide a green lung into urban areas and a recreational resource?

The allocation is of a modest size and is on the periphery of the city's built-up area, so its contribution to providing a green lung into the urban area is very limited. While the site is part of the College's playing fields, it is an unusable part of the playing fields for sports so its contribution to providing a recreational resource is also limited. The allocation will not impinge on the marked-out pitches. As such, taken in isolation, the allocation makes a very minor contribution to the Evington Green Wedge and its de-designation would have negligible impact on the performance of the overall green wedge. More details on the justifications for allocation of this site can be found in the Green Wedge Topic Paper (Submission Document TP/3).

116. How will this allocation and the loss of open space that would result help to promote healthy, inclusive and safe places, as set out in paragraph 92 of the NPPF?

The impact of the loss of open space is minimized as the site is a narrow southward protrusion from the main playing fields area meaning that it is unusable as playing fields. The actual marked out pitches on the main part of Judgemeadow Community College Playing Fields will be unaffected by the allocation. Development of the site will allow for the currently unusable part of the playing fields to be brought into active use. The design and layout of the development will be expected to contribute to a vibrant and safe public realm in line with the criteria of policy DQP01 and promote healthy, inclusive, and safe places in conformity with the criteria set out in the Local Plan's Health and Wellbeing policies.

117. What is the status of the EDDR route and how would it affect the development potential of site 559?

Safeguarding of the EDDR is not a saved policy in the Local Plan (2006). Since the site has been proposed for partial development, the design and layout would help safeguard the

route, if needed.

118. Should the measures required to mitigate the potential effects of housing development on site 559 on the heritage significance of nearby designated and non-designated heritage assets be included within Policy Ho01 or the supporting text for clarity and effectiveness?

The adverse impacts of developing the outlined site are summarised in the 'Suitability summary' of the Non-strategic sites document. This document also includes suggested mitigations for each site, which takes account of heritage assets.

The criteria of relevant Plan policies will be applied to the site allocations, including policy HE01 'The Historic Environment'. The Council believes that further detail on this site in policy Ho01 is not needed for clarity and effectiveness.

119. Is the expected date of 2032 for a planning application to be submitted and an anticipated start date of 2033/34, as set out in EXAM 9, realistic and achievable, given that options for the delivery of the site have still to be explored?

Yes, the expected date of 2032 for a planning application to be submitted and anticipated start date are realistic and achievable. The site is on Council-owned land, which reduces the number of third parties involved in the development process. Options for delivery of the site are currently being explored by the Council. Initial scoping work on this site, alongside the Plan's other non-strategic sites, is currently being undertaken. It is recognized that the site has some challenging constraints, particularly regarding the safeguarding of the EDDR route through the site. Therefore, a submission of a planning application and the start date are not expected until the latter part of the Plan period. Taking the above into consideration, the Council thinks that the timeline set out in EXAM 9 is realistic and achievable.

Site 577: Land adjacent Keyham Lane/Preston Rise

120. Is the allocation of site 577 for housing development of 23 dwellings justified and appropriate, given the loss of open space that would result? How will this help to promote healthy, inclusive and safe places, as set out in paragraph 92 of the NPPF?

This is an underutilised space that has limited recreational value as public open space. The OSSR study [EB/OS/3] identified the site as informal open space and concluded that there is a sufficient supply of

this typology in the north east area of the city.

Development of the site will nonetheless be expected to maintain a green buffer to minimize noise and air pollution from Hamilton Way/A563 and adhere to other criteria of the plans design policies (DQP01) to ensure that the development creates a healthy, inclusive and safe place.

121. Is the expected date of 2028 for a planning application to be submitted and an anticipated start date of 2031/32, as set out in EXAM 9, realistic and achievable, given that options for the delivery of the site have still to be explored?

Yes. The expected date for a planning application to be submitted and an anticipated start date are realistic and achievable as the site is modest in size and is not heavily constrained. The site is on Council-owned land, which reduces the number of third parties involved in the development process. Options for delivery of the site are currently being explored by the Council's Housing Team. Initial scoping work on this site, alongside the Plan's other non-strategic sites, is currently being undertaken.

Site 620: Morton Walk Open Space

122. Is the allocation of the Morton Walk open space for housing development of 9 dwellings justified and appropriate, having regard to its amenity value in providing visual relief amongst the industrial and commercial buildings on Morton Walk and its function as both formal and informal recreational space?

The benefits of partial development of the site will provide access and natural surveillance over the existing open space and play area which will be retained and enhanced. Any impacts to amenity value in providing visual relief will be mitigated by the fact that development is intended to be on the frontage of Hastings Road only, so that the views over Morton Walk Open Space from existing residential development will remain undisturbed.

123. Is the expected date of 2029 for a planning application to be submitted and an anticipated start date of 2030/31, as set out in EXAM 9, realistic and achievable, given that options for the delivery of the site have still to be explored?

Yes. The expected date for a planning application to be submitted and

anticipated start date are realistic and achievable as the allocation is a small site which is not heavily constrained and is proposed for partial development only, with the remaining open space and play area to be retained and enhanced. The site is on Council-owned land, which reduces the number of third parties involved in the development process. Options for delivery of the site are currently being explored by the Council's Housing team. Initial scoping work on this site, alongside the Plan's other non-strategic sites, is currently being undertaken.

Site 629: Netherhall Road Open Space

124. Is the allocation of approximately half of the Netherhall Road Recreation Ground for housing development of 77 dwellings justified and appropriate, having regard to its value as open space, for formal and informal recreation and as a visual amenity within Scraftoft?

This is a large open space within an area identified in the OSSR study [EB/OS/3] as having a sufficient supply of informal open space. Development of the site will create the opportunity to re-naturalise Scraftoft Brook and enhance the open space and play facilities. The size of the site allows for a significant number of dwellings to be delivered whilst also retaining open space in the area that can continue to provide visual amenity to existing and future development as well as the current and enhanced facilities for formal and informal recreation.

125. How will this allocation and the loss of open space that would result help to promote healthy, inclusive and safe places, as set out in paragraph 92 of the NPPF?

The site is for partial development only, with the remainder to be retained and enhanced as open space. Development will also be expected to meet the criteria for open space in new development set by Policy OSSR03. Any outstanding need for contributions towards open space provision arising from the development will be secured by planning condition and/or planning obligation in line with Policy DI01. Development is anticipated either north or south of Scraftoft Brook which will allow for natural surveillance over the open space, in line with design policies (DQP01). On site enhancements of the open space, play area and brook re-naturalisation would provide opportunities for a healthy, inclusive, and safe place in conformity with the Local Plan's health and wellbeing policies.

126. Is the expected date of 2029 for a planning application to be submitted and an anticipated start date of 2030/31, as set out in EXAM 9, realistic and achievable, given that options for the delivery of the site have still to be explored?

The site is on Council-owned land, which reduces the number of third parties involved in the development process. Options for delivery of the site are currently being explored by the Council's Housing team. Initial scoping work on this site, alongside the Plan's other non-strategic sites, is currently being undertaken. The site is being proposed for partial development taking into account the physical constraints on the site, including the need for open space retention in the area, as identified in SD/19 and EXAM 9. Considering the above, the timeline outlined in EXAM 9 is realistic and achievable with completion expected in 2032/33.

Site 631: Newlyn Parade/Crayford Way

127. Is the allocation of open space between Newlyn Parade, Crayford Way, Selby Avenue and Limehurst Road for housing development of 13 dwellings justified and appropriate, having regard to its visual amenity value within the surrounding estate and its use as informal recreational open space?

The benefits of partial development of the site will allow for natural surveillance of the remaining open space which will be retained and enhanced. Any impacts to amenity value will be mitigated through design and layout, in accordance with the criteria of the Local Plan's delivering design quality policies.

128. How will this allocation and the loss of open space that would result help to promote healthy, inclusive and safe places, as set out in paragraph 92 of the NPPF?

Development of the site must retain part of the existing open space and will provide natural surveillance over the open space, in line with the Plan's design principles (DQP01). The retention of existing open space will help to promote the development as healthy, inclusive, and safe in conformity with the criteria set out in the Local Plan's Health and Wellbeing policies. Development will also be expected to meet the criteria for open space in new development set by Policy OSSR03. Any outstanding need for contributions towards open space provision arising from the development will be secured by planning condition and/or planning obligation in line with Policy DI01.

129. Is the expected date of 2029 for a planning application to be submitted and an anticipated start date of 2030/31, as set out in EXAM 9, realistic and achievable, given that options for the delivery of the site have still to be explored?

Yes, the expected date for a planning application to be submitted and anticipated start date are realistic and achievable as the allocation is a small site without significant constraints. It is proposed for partial development only, with the remaining open space to be retained and enhanced. The site is on Council-owned land, which reduces the number of third parties involved in the development process. Options for delivery of the site are currently being explored by the Council's Housing team. Initial scoping work on this site, alongside the Plan's other non-strategic sites, is currently being undertaken.

Site 648: Rayleigh Green

130. Is the allocation of Rayleigh Green for housing development of 18 dwellings justified and appropriate, having regard to its visual amenity value within the surrounding estate and its use as informal recreational open space?

This is an open space within an area identified in the OSSR study [EB/OS/3] as having a sufficient supply of informal open space. Any development on this site will have to consider the Plan's delivering design quality policies and consider its location within the context of the surrounding estate. Trees on site will be retained where possible.

131. How will this allocation and the loss of open space that would result help to promote healthy, inclusive and safe places, as set out in paragraph 92 of the NPPF?

Development will be expected to meet the criteria for open space in new development set by Policy OSSR03. Any outstanding need for contributions towards open space provision arising from the development will be secured by planning condition and/or planning obligation in line with Policy DI01. The design and layout of any development of the site will be expected to contribute to a vibrant and safe public realm in line with policy DQP01, as well as promote healthy, inclusive, and safe places in conformity with the criteria set out in the Local Plan's Health and Wellbeing policies.

132. Is the expected date of 2029 for a planning application to be submitted and an anticipated start date of 2029/30, as set out in EXAM 9, realistic and achievable, given that options for the delivery of the site have still to be explored?

Yes, the expected date for a planning application to be submitted and anticipated start date are realistic and achievable as the allocation is a small site without significant constraints. The site is on Council-owned land, which reduces the number of third parties involved in the development process. Options for delivery of the site are currently being explored by the Council's Housing team. Initial scoping work on this site, alongside the Plan's other non-strategic sites, is currently being undertaken.

Site 684: Land adjacent to Evington Leisure Centre

133. Is the allocation of green space adjacent to Evington Leisure Centre for housing development of 15 dwellings justified and appropriate, having regard, in particular, to its visual amenity and biodiversity value within the surrounding estate?

This is an open space within an area identified in the OSSR study [EB/OS/3] as having a sufficient supply of informal open space. Any development on this site will have to meet the relevant criteria of the Plan's delivering design quality policies.

The site is mainly amenity grassland of low ecology value and young trees of fairly poor value. Biodiversity Net Gain will be achievable on site.

134. How will this allocation and the loss of open space that would result help to promote healthy, inclusive and safe places, as set out in paragraph 92 of the NPPF?

The design and layout of any development of the site will be expected to contribute to a vibrant and safe public realm in line with policy DQP01, as well as promote healthy, inclusive, and safe places in conformity with the criteria set out in the Local Plan's Health and Wellbeing policies. Development will also be expected to meet the criteria for open space in new development set by Policy OSSR03. Any outstanding need for contributions towards open space provision arising from the development will be secured by planning condition and/or planning obligation in line with Policy DI01.

135. Is the expected date of 2029 for a planning application to be submitted and an anticipated start date of 2029/30, as set out in EXAM 9, realistic and achievable, given that options for the delivery of the site have still to be explored?

Yes, the expected date for a planning application to be submitted and the anticipated start date are realistic and achievable as there are not any challenging constraints, and it is a small site. The site is also on Council-owned land which reduces the number of third parties involved in the development process. Options for delivery of the site are currently being explored by the Council. Initial scoping work on this site, alongside the Plan's other non-strategic sites, is currently being undertaken.

Site 715: Land north of Gartree Road

136. Is the allocation of land north of Gartree Road for housing development of 35 dwellings justified and appropriate, having regard to its current role as part of a Green Wedge, the purposes of which in Policy OSSR01 are to prevent settlements merging, provide a green lung into urban areas and act as a recreational resource?

The allocation is of a modest size, so its contribution to preventing the merging of settlements and providing a green lung into the urban area is limited. The site is currently not publicly accessible so does not act as a recreational resource. Allocation of the site would not cause a break or interruption in the connectivity of Evington Green Wedge with adjoining green wedges in Oadby & Wigston Borough Council and Harborough District Council areas. It is considered, on balance, that the allocation would not adversely impact on the overall function of the Green Wedge and therefore it is justified and appropriate. More details on the justifications for allocation of this site can be found in the Green Wedge Topic Paper (Submission Document TP/3).

137. How will this allocation and the loss of open space that would result help to promote healthy, inclusive and safe places, as set out in paragraph 92 of the NPPF?

Development will be expected to meet the criteria for open space in new development set by Policy OSSR03. The site promoter has submitted initial design work that indicates there is potential to connect pedestrian routes within the proposed development to existing routes in the Evington Green Wedge. Any outstanding need for contributions towards open space provision arising from the development will be secured by planning condition and/or planning

obligation in line with Policy DI01.

The design and layout of any development of the site will be expected to contribute to a vibrant and safe public realm in line with policy DQP01, as well as promote healthy, inclusive, and safe places in conformity with the criteria set out in the Local Plan's Health and Wellbeing policies.

138. Given the location of this site within Flood Zone 2, does its allocation for housing satisfy the Sequential Test in paragraph 162 of the NPPF?

The site is not within Flood Zone 2 but is close to an area that is within Flood Zone 2. The entirety of the site is in Flood Zone 1. Any application for development on the site would be expected to be accompanied by a Flood Risk Assessment. Development would also be expected to meet the criteria of CCFR06, which include a requirement for the provision of SuDS.

139. What account has been taken of potential effects of the proposed allocation on heritage assets, including the Scheduled Monument Moated site to the north, and the nationally important archaeology at the site?

These have been considered in the pre-application process and through site assessment. As per NPPF para 189, as a minimum, an archaeological desk-based assessment (DBA) should be completed followed by field evaluation, which will be required at planning application stage. Impacts to Scheduled Monuments will be assessed through a Heritage Impact Assessment at planning application stage, which will fully assess any direct and indirect effects, and their impacts upon significance. On a local plan assessment – it is anticipated that effects on the SAM can be avoided.

140. If, according to the evidence in EXAM 9, house building on this site is expected to take around 18 months to complete, is the projected build out rate of all 35 dwellings in 2029/30 accurate?

Yes, the projected build out rate is accurate as it is informed by the most recent engagement with the landowner, which is reflected in EXAM 9. It is expected that the construction will take 18 months in total, inclusive of 6 months site preparation work. Therefore, all 35 dwellings are expected to be completed in 2029/30.

Site 962: Amenity land between Coleman Road and Goodwood Road

141. Is the allocation of the amenity land at site 962 for housing development of 9 dwellings justified and appropriate, given the loss of mature trees that would result?

This is justified and appropriate as the mature trees are to the north of the site, but development on the southern portion of the site could be achieved following design work undertaken on the site's capacity. Any adverse impacts on trees or biodiversity on site will be compensated for through meeting Biodiversity Net Gain requirements (NE02).

142. Is the expected date of 2026/27 for a planning application to be submitted, an anticipated start date of 2027/28 and completion in 2028, as set out in EXAM 9, realistic and achievable, given that options for the delivery of the site have still to be explored?

Yes. It is recognised that the expected date for submission of a planning application is not far away, however, the allocation is quite small. There are some constraints on the site relating primarily to ecology, biodiversity, and the presence of mature trees. These constraints can be overcome through design and layout work in line with Policy DQP01, retention of mature trees where possible, and other mitigation measures. The site is on Council-owned land which reduces the number of third parties involved in the development process. Options for delivery of the site are currently being explored by the Council. Initial scoping work on this site, alongside the Plan's other non-strategic sites, is currently being undertaken.

Site 1035: VRRE/Gipsy Lane

143. What consultation was undertaken by the Council with the landowner of site 1035 as part of the assessment of sites suitable for allocation for housing in the Plan?

The Council have consulted all local business owners as part of the consultation process including letters directly sent to the business owners on site and site notices near the site.

144. What effect would the Council's proposal to delete site 1035 from the list of non-strategic housing allocations have on the Plan's proposed housing land supply?

The loss of 12 dwellings will have minimal impact to the Housing Land Supply. The Council have considered this as part of the housing buffer which is intended to respond to the dynamic nature of the housing market, and the fact that housing land supply is not an exact science.

Site 1037: Spence Street

145. Is the allocation of site 1037 for housing justified and consistent with national policy, given its location in an area at high risk of flooding?

Yes, the allocation is justified and consistent with national policy, as it is for partial development only and the majority of the site lies within Flood Zone 1. Development will be directed to those parts of the site at lower risk of flooding and application of the exception test will be required, in line with the paragraphs on Planning and Flood Risk in Chapter 14 of the NPPF, the Flood Risk and Coastal Change section of the PPG, and the criteria of Policy CCFR06. The site is on previously developed land and, as noted on p. 7 of Submission Document EB/CC/2h, redevelopment of the site presents an opportunity to address existing flood risk issues. A flood risk assessment will be required for any development of the site, focusing on mitigation measures identified on pp. 170 and 171 of Submission Document EB/CC/2h.

146. In light of the constraints to be addressed to deliver the redevelopment of site 1037 for housing, including multiple ownership, relocation of existing uses, and the range of mitigation measures required, including for flood risk, what evidence is there that this site will be available and could be viably developed within the Plan period?

This site was assessed through the Economic Development Needs Assessment (EDNA) (EB/EM/1) and was graded as being of low quality. The site was received and assessed as suitable for housing based on its low grading in the EDNA. This is explained in para 5.13 of Housing and Sites Topic Paper (TP/5). The site was consulted at Reg 18 and Reg 19. No issues were raised on availability of the site by landowners at both stages and through the EDNA (SD/9, page 184 and SD/17a). The landowners were contacted as part of the sites deliverability update earlier this year, which invited landowners to raise any issues with allocation of the site for housing. No issues have been raised through landowner engagement.

The existing use has been considered as part of the detailed sites

assessment along with other physical constraints including flooding. The site has been assessed as part of whole plan viability assessment typologies (EB/DI/3). Based on above, the Council thinks that the site is achievable within the plan period.

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

147. Is the allocation of site 1041 for 21 dwellings justified and realistic, given its Local Wildlife Site status and the unresolved access issues?

This site is not currently a Local Wildlife Site but was considered as a potential LWS. Any development on the site would be expected to take into account the existing biodiversity on the site, as well as meeting BNG requirements in line with national requirements and policy NE02. It is anticipated that the delivery can take place without impinging upon the wildlife interest in the site.

The site has been proposed for development in the latter part of the Plan Period and it is anticipated that access issues will be resolved.

148. Is the expected date of 2031 for a planning application to be submitted, an anticipated start date of 3032/33 and completion in 2033, as set out in EXAM 9, realistic and achievable, given that options for the delivery of the site have still to be explored?

Yes, the expected date for submission of a planning application, anticipated start date, and completion date are realistic and achievable as the site is on Council-owned land, which reduces the number of third parties involved in the development process. Options for delivery of the site are currently being explored by the Council's Housing team. Initial scoping work on this site, alongside the Plan's other non-strategic sites, is currently being undertaken. It is recognised that the site has challenging constraints regarding access. Therefore, the submission date for a planning application and start date are expected to be in the latter part of the Plan period, allowing time for these constraints to be resolved.

Appendix 6 Sites – North West and West Areas

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

of the proposed new dwellings? How would this be addressed?

Both the West and North West areas of the city currently have sufficient overall open space against its required provision as identified by the Open Space, Sport and Recreation Study (2017) [EB/OS/3]. It is acknowledged that development of sites in these areas will create additional demand, but policies including OSSR03 and the provisions of the strategic site policies will ensure that this demand is met either through on site open space provision or improvements to existing OSSR facilities in the local area. Some sites in the North West and West are allocated for partial development, in recognition of the need for open space in those localities while also meeting as much of the City's housing need as possible.

Site 190: Lanesborough Road – Former Allotments

150. Is the allocation of this site for 37 dwellings justified and appropriate, having regard to access and car parking, and the living conditions of neighbouring residents?

This is justified and appropriate. The planning application 20200789 was approved on this site allocation for 37 dwellings in August 2022. Conditions have been applied to the planning approval in regard to access, car parking and living conditions. The Council believes that all impacts to neighbouring residents can be mitigated in this development.

151. Is the anticipated start date of Spring 2025 set out in EXAM 9 realistic given the requirement to manage the existing ecology and biodiversity in line with reports/surveys?

Yes, this is achievable. The surveys and reports are currently being undertaken and the Council envisage a start on site based on these dates.

A start on site may be beyond 2024/25 but it is not expected that this will impact on completion timeframes of delivery assumed in the plan.

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

Yes, this is appropriate. The planning application on this site was approved in August 2022 and work is being undertaken on the site.

As stated in our response to Q. 151, that while a start on site

may be beyond 2024/25, it is not expected that this will impact on completion timeframes.

Site 449: Allextton Gardens Open Space

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

This is in an open space within an area identified in the OSSR study [EB/OS/3] as having sufficient overall open space. The site is within close proximity to Western Park as alternative open space.

Development of the site is of moderate size, but there is unlikely to be an adverse impact on overall space need created by the development. However, development of the site will provide opportunities for off-site enhancements to nearby open spaces such as Western Park.

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

Yes, with a planning application expected to be submitted in 2028 (as specified in EXAM 9), the anticipated start date of 2029/30, build out rate, and completion date are realistic as there are not any challenging constraints, and it is a small site. The site is also on Council-owned land which reduces the number of third parties involved in the development process. Options for delivery of the site are currently being explored by the Council's Housing team. Initial scoping work on this site, alongside the Plan's other non-strategic sites, is currently being undertaken.

Site 525: Fulford Road Open Space

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

Yes, the allocation is justified and appropriate as constraints including ecology, biodiversity, air pollution, and services have been assessed as part of the detailed site assessments and appropriate mitigation measures have also been suggested (SD/19). There is potential to retain the green buffer fronting onto Scudamore Road to provide

some relief of impacts from the road and industrial uses, as well as some biodiversity networks.

The site is serviced by Ryder Road retail centre, employment opportunities to the south and a regular bus route to and from the city centre. The infrastructure has been assessed as part of the Local Plan Infrastructure Study (EB/DI/1). Any need for contributions towards infrastructure arising from the development will be secured by planning condition and/or planning obligation in line with Policy DI01.

The site is within an area identified in the OSSR study [EB/OS/3] as having sufficient overall open space. The site is also within close proximity to the strategic site at the Former Western Park Golf Course which proposes to retain around 3.48Ha of open space as well as open space provision at Ryder Road open space. Development will also be expected to meet the criteria for open space in new development set by Policy OSSR03.

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

Yes. Although the site does not yet benefit from planning permission, it is expected that one will be submitted in 2028 (as mentioned in EXAM 9), which allows sufficient time from the point of Plan adoption for preparatory work on an application to be completed. While the site has some constraints, particularly around ecology and biodiversity, suggested mitigations have been set out in the non-strategic sites document (SD/19). The site is on Council-owned land which reduces the number of third parties involved in the development process. Options for delivery of the site are currently being explored by the Council. Initial scoping work on this site, alongside the Plan's other non-strategic sites, is currently being undertaken. The Council thinks that the anticipated start date of 2029/30, build out rate, and completion date are realistic.

Site 529: Glovers Walk Open Space

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

This is a large open space within an area identified in the OSSR study [EB/OS/3] as having a sufficient supply of informal open space. The

site is allocated for partial development with the rest to be retained and enhanced as open space. Play facilities on site are anticipated to be retained on site as part of the development. The overall allocation of the site will allow for coordinated development with the planning application site to the north east, which previously received planning permission for extra care uses (20151729).

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

Yes, the anticipated start date of 2033/34, build out rate, and completion date are realistic as the site has relatively few constraints and is on Council-owned land, which reduces the number of third parties involved in the development process. Options for delivery of the site are currently being explored by the Council's Housing team. Initial scoping work on this site, alongside the Plan's other non-strategic sites, is currently being undertaken. The expected date for submission of a planning application and the anticipated start date have been pushed back in the housing trajectory due to a change in commercial needs for the site, as is mentioned in EXAM 9.

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

The change in commercial needs for the site relates to the integration of the development of the land at Tilling Road. To allow the development of the site to be delivered in conjunction with the neighbouring uses in a comprehensive manner, this has been put back in the Plan Period. This has been informed by the most recent landowner engagement. This will not affect the developability of the site as the allocation will still be developable within the Plan period as explained in our answer to Q. 158 above.

Site 549: Hockley Farm Road Open Space

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

Yes, the allocation is justified and appropriate as the site is within an area identified in the OSSR study [EB/OS/3] as having a

sufficient supply of overall open space. There are no open space facilities on the site and any development proposal would be expected to meet the open space in new development criteria of Policy OSSR03. The site is very close to Braunstone Park, which provides alternative open space.

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

The site allocations do not preclude specific types of residential typologies. This will be determined at application stage against relevant policies in the plan. Site capacity has been calculated using the standard density of 35dph. The council would be willing to consider a higher density development to meet the older persons housing need which is in keeping with character of the surrounding area.

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

Development is expected to commence in 2034/35. This is a typographical error.

163. Is the anticipated start date, build out rate (8 dwellings in 2034/35) and completion date (2035) realistic given that the site does not yet benefit from planning permission and the Council is yet to explore options for delivery and routes to market the site?

Yes, the anticipated start date of 2034/35, build out rate, and completion date are realistic as the site has relatively few constraints and is on Council-owned land, which reduces the number of third parties involved in the development process. Options for delivery of the site are currently being explored by the Council's Housing team. Initial scoping work on this site, alongside the Plan's other non-strategic sites, is currently being undertaken. The expected date for submission of a planning application and the anticipated start date have been pushed back in the housing trajectory due to a change in commercial needs for the site, as is mentioned in EXAM 9.

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

The change in commercial needs for the site relates to the integration

of the development of adjoining land at Hockley Farm Road. To allow the development of the site to be delivered in conjunction with the neighbouring uses in a comprehensive manner, this has been put back in the Plan Period. This has been informed by the most recent landowner engagement. This will not affect the developability of the site as the allocation will still be developable within the Plan period as explained in our answer to Q. 163 above.

Site 557: Ingold Avenue Open Space

165. Is the allocation of this site for 54 dwellings justified and appropriate, having regard to ecology and biodiversity, air, light and noise pollution, local services and infrastructure, and its current use as open space?

Yes, the allocation is justified and appropriate having regard to ecology and biodiversity, as these constraints have been assessed as part of the detailed site assessments and appropriate mitigation measures have also been suggested (SD/19). The allocation is also justified and appropriate with regard to air, light, and noise pollution as it is a housing allocation for partial development only within an existing residential area so it will not contribute significantly to exacerbating these types of pollution in the area. Importantly, the site is not close to an air quality monitoring area, so air pollution at the site is not considered to be at a level of concern.

Home Farm, Strasbourg Drive and Marwood Road local centres are a short distance from the site, and there are regular bus services to and from the city centre passing near the site. The need for infrastructure as a result of development has been assessed as part of the Local Plan Infrastructure Study (EB/DI/1). Any need for contributions towards infrastructure arising from the development will be secured by planning condition and/or planning obligation in line with Policy DI01.

This is in an open space within an area identified in the OSSR study [EB/OS/3] as having sufficient overall open space. 1.23ha of the site will be retained and enhanced as open space.

166. Is the anticipated start date (2028/29), build out rate (10 dwellings in 2029/30; 26 dwellings in 2030/31; 18 dwellings in 2031/32) and completion date (2032) realistic given that the site does not yet benefit from planning permission and the Council is yet to explore options for delivery and routes to market the site?

Yes, the anticipated start date, build out rate and completion date are

realistic as the site is on Council-owned land, which reduces the number of third parties involved in the development process. Options for delivery of the site are currently being explored by the Council's Housing team. Initial scoping work on this site, alongside the Plan's other non-strategic sites, is currently being undertaken. Planning application is expected to be submitted in 2027. Considering the constraints on the site, development is anticipated to come forward in 2028/29 to allow time for any required preparation work on the site. The first dwellings are expected to be completed in 2029/30.

The timeline outlined in EXAM 9 is achievable and site completion is expected for 2032.

Site 569: Krefeld Way/Darent Drive Open Space

167. Is the allocation of this site for 33 dwellings justified and appropriate, having regard to ecology and biodiversity, existing trees, local services and infrastructure, and its current use as open space?

Yes, the allocation is justified and appropriate having regard to ecology and biodiversity and existing sites as these constraints have been assessed as part of the detailed site assessments and appropriate mitigation measures have also been suggested (SD/19). Proposals for this site would be required to retain some mature trees to help contribute a noise buffer and retain ecology where possible. Any identified impacts regarding biodiversity would have to meet the requirements of policy NE02. The site is well serviced in regard to local services, it is a short distance from Beaumont Shopping Centre. The site has a frequent bus route to the city centre to allow for access to some services including the railway station.

The need for infrastructure as a result of development has been assessed as part of the Local Plan Infrastructure Study (EB/DI/1). Any need for contributions towards infrastructure arising from the development will be secured by planning condition and/or planning obligation in line with Policy DI01.

The site is within an area identified in the OSSR study [EB/OS/3] as having a sufficient supply of open space. The site is also adjacent to alternative open space. Any development proposal would be expected to meet the open space in new development criteria of Policy OSSR03.

168. Is the anticipated start date (2028/29), build out rate (4 dwellings in 2028/29; 16 dwellings in 2029/30; 13 dwellings in 2030/31) and completion date (2031) realistic given that the

site does not yet benefit from planning permission and the Council is yet to explore options for delivery and routes to market the site?

Yes, the anticipated start date, build out rate, and completion date are realistic because the site does not have any significant constraints and it is on Council-owned land, which reduces the number of third parties involved in the development process. Options for delivery of the site are currently being explored by the Council's Housing team. Initial scoping work on this site, alongside the Plan's other non-strategic sites, is currently being undertaken. Considering the above, a planning application is expected to be submitted in 2027 with first dwellings built in 2028/29 and site completion in 2031.

Site 589: Land to the east of Beaumont Leys Lane

169. Is the allocation of this site for 34 dwellings justified and appropriate, having regard to ecology and biodiversity, air, light and noise pollution, local services and infrastructure, and its current use as open space?

Yes. Proposals for this site would be required to retain some mature trees to help contribute a noise buffer and retain ecology where possible. Development of the site would require an ecological assessment with the aim of retaining the ecologic value. Any identified impacts would have to be mitigated in line with policies NE02 and DQP06. It has not been identified that any infrastructure provision is needed for this site and is well serviced with regard to local services. The site has a frequent bus route to the city centre to allow for access to some services including the railway station and healthcare.

This is in an open space within an area identified in the OSSR study [EB/OS/3] as having sufficient overall open space. The site is in proximity to alternative open spaces including the proposed retention of open space at Beaumont Park.

170. Is the anticipated start date (2030/31), build out rate (4 dwellings in 2030/31; 16 dwellings in 2031/32; 14 dwellings in 2032/33) and completion date (2033) realistic given that the site does not yet benefit from planning permission and the Council is yet to explore options for delivery and routes to market the site?

Yes, the anticipated start date, build out rate, and completion date are realistic because the site has few constraints and is on Council-owned land, which reduces the number of third parties involved in the development

process. Options for delivery of the site are currently being explored by the Council. Initial scoping work on this site, alongside the Plan's other non-strategic sites, is currently being undertaken. Considering the above, a planning application is expected to be submitted in 2029 with first dwellings built in 2030/31 and site completion in 2032/33.

Site 646: Rancliffe Gardens

171. Is the allocation of this site for 52 dwellings justified and appropriate?

Yes, the allocation is justified as the site is in a sustainable location and will make a contribution towards meeting as much of the city's housing need within its administrative boundaries as possible while balancing that against competing land use needs such as employment land and open space.

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

Yes, the anticipated start date of 2033/34, build out rate, and completion date are considered to be realistic as the site is on Council-owned land, which reduces the number of third parties involved in the development process. Options for delivery of the site are currently being explored by the Council. Initial scoping work on this site, alongside the Plan's other non-strategic sites, is currently being undertaken. It is recognised that the site has some challenging constraints, particularly regarding biodiversity. The submission date for a planning application and start date are expected to be in the latter part of the Plan period, allowing time for these constraints to be resolved.

Site 992: Woodstock Road

173. Is the allocation of this site for 5 dwellings justified and appropriate?

Yes, the allocation is justified as the site is in a sustainable location and will make a modest contribution towards meeting as much of the city's housing need within its administrative boundaries as possible while balancing that against competing land use needs such as employment land and open space.

Allocation of this site is consistent with Planning Practice Guidance which states that it is appropriate to consider all sites and broad locations capable of delivering five or more dwellings (NPPG Paragraph: 009 Reference ID: 3-

009-20190722).

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

Yes, the anticipated start date of 2031/32, build out rate, and completion date are considered to be realistic as the site is on Council-owned land, which reduces the number of third parties involved in the development process. Options for delivery of the site are currently being explored by the Council. Initial scoping work on this site, alongside the Plan's other non-strategic sites, is currently being undertaken. Due to the topography of the site, the start date is expected to be in 2031/32, and as the site is small, completion is expected for 2032.

Site 1001: Phillips Crescent

175. Is the allocation of this site for 5 dwellings justified and appropriate, having regard to its current use as green space?

Yes, the allocation is justified and appropriate, having regard to its current use as green space as the site is in an OSSR Study (2017) [EB/OS/3] area that has sufficient overall open space when measured against its required provision. It is considered that as the site is of a modest size, the additional demand for open space generated by its development will not be significant. There is alternative open space provision a short distance from the site at Astill Lodge Park.

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

Yes, the timescales are realistic considering that the site is on Council-owned land, which reduces the number of third parties involved in the development process. Options for delivery of the site are currently being explored by the Council. Initial scoping work on this site, alongside the Plan's other non-strategic sites, is currently being undertaken. Considering the constraints including the presence of TPO

trees and a public right of way, the site is expected to come forward and be completed in 2031/32.

Site 1007: Glazebrook Square

177. Is the allocation of this site for 12 dwellings justified and appropriate, having regard to highway safety and its current use as green space?

Yes, the allocation of this site is justified and appropriate regarding highway safety as any proposed development will be expected to meet the relevant criteria of local plan policies that ensure highway safety, including Policy DQP01 'Design Principles', Policy T03 'Accessibility and Development', and Policy T06 'Highways Infrastructure', as applicable.

The allocation is also justified and appropriate having regard to its current use as green space as the site is in an OSSR Study (2017) [EB/OS/3] area that has sufficient overall open space when measured against its required provision. It is considered that as the site is of a modest size, the additional demand for open space generated by its development will not be significant. There is alternative open space provision a short distance from the site at Stokes Wood Park.

178. Is the anticipated start date (2027/28), build out rate (12 dwellings in 2028/29) and completion date (2029) realistic given that the site does not yet benefit from planning permission and the Council is yet to explore options for delivery and routes to market the site?

Yes, the anticipated start date, build out rate, and completion date are realistic as the allocation is a small site which is not heavily constrained, so will come forward in the earlier part of the Plan period. The site is on Council-owned land, which reduces the number of third parties involved in the development process. Options for delivery of the site are currently being explored by the Council's Housing team. Initial scoping work on this site, alongside the Plan's other non-strategic sites, is currently being undertaken.

Site 1034: Forest Lodge Education Centre, Charnor Road

179. Is the allocation of this site for 26 dwellings justified and appropriate, having regard to existing trees and the living conditions of neighbouring residents, and its current use as green space?

Yes, the allocation is justified and appropriate with regard to existing trees as any development application for the site must consider retention of the mature trees on site, where possible, or mitigation for their loss, in line with NPPF para. 180 a). Mature trees are present in the southwestern part of the site only.

The allocation is justified and appropriate in respect of the living conditions of neighbouring residents as the site is allocated for housing within an existing residential area and any development proposal will be expected to meet the relevant criteria of planning policies that ensure the amenity of neighbours.

The current use of the site is not green space. The site is previously developed land.

180. Has the planning application been submitted for 33 dwellings on this site?

Yes, a full application (20240741) was submitted in April 2024 which is currently pending a decision.

181. Is the anticipated start date (2024/25), build out rate (3 dwellings in 2024/25; 30 dwellings in 2025/26) and completion date (2026) realistic given that the site does not yet benefit from planning permission?

Yes, the anticipated start date, build out rate, and completion dates are realistic and have been informed by recent landowner engagement. Demolition of the existing buildings has already taken place and an application for development of the site has been submitted and is currently pending a decision. A start on site may be beyond 2024/25 but it is not expected that this will impact on completion timeframes.

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

182. Is the allocation of this site for 53 dwellings justified and appropriate, having regard to its previous use as playing fields?

Yes, the allocation is justified and appropriate having regard to its previous use as playing fields as the site is the latest phase of a residential development at Somerset Avenue (planning app 20160871). The overall site is an allocation in the adopted 2006 City of Leicester Local Plan and is listed in Policy H01 'New Housing Development Proposals' as 'Blackbird Road Playing Fields (part)'. The

site is an area of unused playing fields which are surplus to requirements in line with NPPF, para. 99. Prior to inclusion in Policy H01, the site was considered in the context of the Assessment of Playing Pitches which was undertaken in partnership with Sport England. S.106 contributions were obtained at Phase I stage to compensate for the loss of sports pitches.

183. Should the capacity of this site be increased from 53 to 60 dwellings to reflect the pre-application?

No, the Council have applied the standard density of 35dph on this site. It is the Council's view that an increase in the site capacity before a planning application is granted would not be consistent with the approach taken to the rest of the Local Plan housing allocations.

184. Is the anticipated start date, within 18 months of securing planning permission, build out rate (27 dwellings in 2027/28; 26 dwellings 2028/29) and completion date (2029) realistic given that the site does not yet benefit from planning permission?

Yes, the anticipated start date, build out rate, and completion dates are realistic and have been informed by preapplication engagement with the landowner who is also the developer. The site is the latest phase of a residential development, the earlier phases of which has already been completed by the same landowner/developer.

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

No, planning permission for a greater number of dwellings than that proposed in the allocation has not been granted, so it would be premature to amend the housing trajectory at this time.

Policy Ho02 – Housing Development on Unallocated Sites

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

This would count as windfall allowance considered as part of the housing supply and is shown in the housing provision table (Table 1 on page 49 of the submitted plan). It is also mentioned within Policy Ho02 that council will support proposals in accordance with Spatial Strategy Policy SL01 which contribute towards meeting the local development needs.

The council agrees that a main modification to add reference to windfall in spatial strategy policy SL01 is justified.

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

Supplementary Planning Documents and design guide codes will become material consideration once approved and adopted. These have been referenced in various sections in the plan in supporting text (Delivering Design Quality chapter paras 8.6 and 8.7) as well as Character Area policies. The council is committed to producing supplementary planning documents after plan adoption. It is council's intention to produce a number of SPDs within 6 months once the plan is adopted. The council doesn't see the design codes as part of this plan but would address this matter as part of an early review. Council thinks that the policy is justified and consistent with national policy.

Council believes that the policy is consistent with national policy.

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

The council feels that the policy is clear that proposals will be supported by existing infrastructure or provide new infrastructure as part of the development. In addition, the policy should be used in conjunction with other policies in the plan including Policy DI01. However, this can be considered as a modification to include reference to Policy DI01.

Windfall allowance

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

The council believes the approach is justified as we would rely on commitments and allocations in the first few years of the plan period. The allowance of 214 dpa is based on proportionate evidence on past delivery rate which is included in SHELAA 2022 (EB/HO/3) as well as the Sites Methodology Paper (EB/HO/5 – Section 4.4 on page 4).

Central Area Capacity

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

This has been based on the CDA Capacity Study (EB/CD/10) done by independent consultants. The study suggested lower as well as higher growth for the CDA in addition to average growth scenario. The supply of 6,286 dwellings for CDA has been chosen as being more realistic and achievable in comparison to the other scenarios. Based on past delivery rates within the area, it is anticipated that this will be delivered within the plan period, and is if anything a conservative assumption. This is reflected in the original trajectory submitted as part of the plan (Appendix 1).

There is no doubt that delivery in the CDA will be challenging. The assumptions made in this regard are therefore cautious, being based on the past track record of delivery, the Council's detailed knowledge of the individual sites and the ongoing interventions in the market (through site assembly, regeneration initiatives and working directly with developers to make its own land available). The details are set out more fully in the response to Matter 6.

Commitments

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

The timescales set out in the housing trajectory (Exam 9) have been based on updated and proportionate evidence on the commitments included in the updated land availability assessment (2022-23 monitoring year). This is also based on the latest information received through landowner engagement as well as the overall update to the deliverability done in February 2024. Council believes that planning permissions are deliverable and developable as set out in the latest trajectory in Exam 9.

5-year Housing Land Supply

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

The Strategic Housing & Economic Land Availability Assessment (EB/HO/3, Appendix E on pages 116-117) includes two scenarios:

1. If the unmet need will be accommodated in the Housing Market Area (HMA), the council will be able to demonstrate a 6.7 years of housing supply on adoption.
2. If the unmet need is not met within the HMA, the council will have a 3.5 years of supply.

There is agreement to meet Leicester's unmet need as shown in the Leicester & Leicestershire Statement of Common Ground with a small deficit of 85 dpa (SCG/1, Table 3 and Para 4.1). Since the council will be able to demonstrate 6.7 years of supply upon adoption as mentioned in scenario 1 above, a small deficit is not likely to impact the 5yhl's position. Policies will be monitored and reviewed against the adopted plan target which as shown in the SHELAA will help demonstrate at least 5 year housing land supply.

Overall Housing Land Supply

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

The anticipated supply within the plan period as shown in Table 1 (page 49) of the submitted plan, will be sufficient to meet the housing requirement (target) of 1,296 dwellings per annum (20,730 dwellings over the plan period). This includes a buffer of 11% and unmet need met of 18,694 dwellings being redistributed within the housing market area. This is supported by robust and proportionate evidence in relation to allocations, the CDA capacity, commitments considered deliverable at the time of submission, windfall allowance and completions for the period of 2020-22.

Other Housing Policies

Policy Ho03 – Housing Mix including Adaptable and Accessible Homes

194. Does Policy Ho03 adequately explain what is meant by "Achieve a mix of house types, tenures and sizes" having regard to paragraphs 60 and 63 of the NPPF?

Housing Mix Policy Ho03 seeks to achieve a balanced mix and type of housing to be addressed through future developments. The policy refers to the housing mix tables (Tables 2 and 3 in the Plan) which include the identified need of market and affordable homes of different

sizes. This need must be taken into account in determining any future proposals. Should any new evidence come forward post plan adoption, the policy makes provision for that to be taken into consideration when determining applications.

The supporting text for the policy states that the plan seeks to achieve a mix of balanced communities through the provision of a range of housing mix and type including the needs of student homes, those wanting to build self-build / custom-build and those needing accessible and adaptable homes. This is addressed through other housing policies within the chapter.

195. The optional technical standards in relation to accessibility should only be required if they address a clearly evidenced need and where their impact on viability has been considered. What is the evidence in relation to need and viability for the proposed access standards in Policy Ho03?

As mentioned in paragraph 5.23 of the submitted plan where an identified need exists, councils should state in their local plan the proportion of new dwellings which should comply with these requirements. The Local Housing Needs Assessment February 2022 update identifies a minimum need of 29% for adapted housing between 2020-36 (pages 8-9 of EB/HO/1 as well as pages 46-52). This includes a minimum figure of 1,270 dwellings required to be built to M4(3) standards.

The impact of building to higher standards has been assessed in the Whole Plan Viability Assessment (EB/DI/3 – section 8 of the report 8. 14-8.19) setting out the additional costs.

In July 2022 (after the completion of the Whole Plan Viability Assessment), the Government announced the outcome of the 2020 consultation on raising accessibility standards of new homes² saying '*that the most appropriate way forward is to mandate the current M4(2) (Category 2: Accessible and adaptable dwellings) requirement in Building Regulations as a minimum standard for all new homes*'. The Government will now consult further on the technical changes to the Building Regulations to mandate the higher M4(2) accessibility standard. No timescale has been announced, however, the modelling in the Whole Plan Viability Assessment assumed that all homes not subject to the M4(3) standards were to be built to M4(2) standard.

196. Will Policy Ho03 and reference to Tables 2 and 3 of the

² [Raising accessibility standards for new homes: summary of consultation responses and government response - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes)

supporting text be effective in helping to ensure that the need for different types of homes, particularly for older persons, in different parts of the city are met throughout the Plan period?

Clause (b) of the policy supports and encourages older persons housing through supporting retirement homes, sheltered homes and care homes. These will be expected to meet the M4(2) accessibility requirements. Whilst tables 2 and 3 include the size, type and tenure of housing, the Local Housing Needs Evidence (EB/HO/1) includes and identifies the need for older persons housing which can be met through the provision of accessible and adaptable standards. Council thinks Policy Ho03 will effectively meet the need for different types of homes including for older persons.

197. Is it intended to apply Policy Ho03 to all housing developments regardless of scheme size?

It is the Council's intention to apply the policy to seek a balanced mix of housing to meet the needs of the community through all residential development except the requirement of at least 10% affordable housing which will be expected to meet the M4(3) technical standards as this will be in proportion to the affordable housing policy which will apply on major schemes.

198. For clarity should Policy Ho03 cross reference to other policies that refer to specific housing types, such as self-build?

See previous answer to housing mix policy question 194.

In order to keep policies as simple as possible this has been addressed through a separate policy on self-build. The overall section "Meeting a Range on Housing Needs" and its paragraph (Para 5.19) addresses self-build as part of range of housing that must be provided in the city. This is then followed through a separate policy (Policy Ho06).

199. Should criterion b) of Policy Ho03 be amended to include reference to the higher standard of M4(3) given the evidence that more wheelchair accessible accommodation will be / is required?

The need to meet the requirement for M4(3) technical standards has been addressed through criterion c) of the policy. This is also informed by the viability assessment. Since there is an overlap between the identified need for housing for older people and that for people with disability within the Local Housing Needs Assessment (EB/HO/1), any

gaps can be met through the provision within criterion c) of the policy. Much of the need for wheelchair users is for 75+ years, so as much of the older person stock as possible should be M4(3).

Paragraph 56-009-20150327 of the PPG restricts the mandating of M4(3) standards:

Part M of the Building Regulations sets a distinction between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings.

Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.

The policy is consistent with this.

The testing in Whole Plan Viability Assessment incorporates is on the basis that 10% of the dwellings will be to accessible and adaptable standards (M4(3) technical standards)) and the recommendations for affordable housing are made, taking this into account.

200. Whilst it is accepted that Policy Ho06 deals with the implementation of self-build/custom build housing, should the requirement for this type of housing be set out in criterion a) of Policy Ho03, particularly given the current shortfall of such plots?

As mentioned in response to Question 198, Policy Ho03 has been succinctly written and self-build / custom-build has been addressed through a separate policy.

Policy Ho04 – Affordable Housing

201. What are the past trends in affordable housing delivery in terms of completions and housing type and tenure? How is this likely to change in the future?

Affordable housing completions have been reported in our latest Authority Monitoring Report (SD/14b section 6.7 on page 12). A total of 2,520 affordable homes were completed since 2010/11 until 2021/22 with an average of 210 dwellings per annum.

The following table reflects completions by tenure over last few years.

Affordable Housing Completions by Tenure – 1st April 2017 through to 31st March 2022

Year:	Social Rent	Afford Rent	Affordable Private Rent	First Homes Early Delivery (FHED)	First Homes Planning Gain	Intermediate Aff Hsg Shared Ownership	Intermediate Aff Hsg Rent	Annual Total/All Aff Hsg Tenures
2017/18	2	59	-	-	-	17	3	81
2018/19	0	150	0	-	-	70	4	224
2019/20	0	290	0	-	-	41	9	340
2020/21	0	126	0	-	-	0	11	137
2021/22	0	338	0	-	0	20	8	366
TOTALS	52	1,126	0	9	0	152	47	1,148

Going forward, it is anticipated that with plan adoption, the allocations will support the provision of affordable housing contribution through the delivery of housing in compliance with affordable housing policy. With 30% contribution on greenfield sites involving a major scheme should help deliver 790 affordable homes within the plan period.

202. Are the requirements of Policy Ho04, at criterion a), justified by adequate, proportionate and up to date evidence about need and viability?

The affordable housing policy has been informed and supported by proportionate, robust and up to date evidence. The Local Housing Assessment (EB/HO/1) identifies that that Leicester has a total affordable housing need of 1,117 dwellings per annum for the period 2020-36 (17,871 affordable homes over the plan period). The policy has also been informed by Whole Plan Viability Assessment (EB/DI/3)

Whole Plan Viability Assessment (EB/DI/3) was completed in 2022 and is an update to the 2019 iteration. The report was prepared in line with the requirements of the NPPF and PPG and following the Harman Guidance. It's also in accordance with the relevant RICS Guidance. It has been subject to both formal and informal consultation.

The ability to deliver affordable housing in the City is constrained by viability. The Whole Plan Viability Assessment identifies that 30% contribution on greenfield sites involving a major scheme and 10% contribution on brownfield sites in Ashton Green and South East

Leicester areas involving a high density major scheme would be viable. It is timely to note that there are no higher density allocations in either the Ashton Green or the Southeast Leicester areas.

Appendix 15 of the Whole Plan Viability Assessment includes the analysis behind the recommendations. This being testing varied values of affordable housing (0% to 30%) against varied levels of developer contributions (£0 per unit to £25,000 per unit). The results are summarised in paragraph 10.32 and are reflected in the policy.

The policy has been appraised in Sustainability Appraisal (SD/4e – Appendix D – Detailed Appraisal of Local Plan Policies, pages 17-18) where in it has been concluded that although more affordable homes are needed than the policy will deliver, but that would not be viable.

203. Is the reference in Policy Ho04 to 75% of the affordable homes being for rent and 25% for low cost home ownership justified? Is it consistent with the national policy expectation that 10% of homes on major sites should be available for affordable home ownership (NPPF paragraph 66)?

As set out in Tables 2 and 3 of the Local Housing Needs Evidence (EB/HO/1), the overriding need of affordable housing across the city is for affordable housing for rent. The tables show some need for First Homes / low-cost home ownership, but most of the need is for social / affordable rent.

Through the plan making process, the Council gave careful consideration to seeking 10% affordable housing across all sites not subject to 30% affordable housing so to align with national policy. However, this was decided against as it was felt likely to lead to viability being considered at the development stage that would simply conclude that affordable housing could not be delivered.

As the overriding need of affordable housing across the city is for affordable housing for rent, the policy has been drafted to maximise delivery of affordable housing for rent, whilst meeting the requirement for 25% First Homes, thus aligning more closely with the need for affordable housing.

204. Given that the requirement for affordable homes arises from the need of the City's population, is the approach to require 0% affordable housing within the CDA justified? What evidence is there to show that affordable housing in the CDA is not required? What is the evidence to support the Council's decision to support space standards in terms of viability and not affordable housing within the CDA?

There is a need for affordable housing across all parts of the City as set out in the Local Housing Needs Assessment (EB/HO/1).

Appendix 15 of the Whole Plan Viability Assessment includes the analysis behind the recommendations, being testing varied values of affordable housing (0% to 30%) against varied levels of developer contributions (£0 per unit to £25,000 per unit). The results are summarised in paragraph 10.32.

Central Development Area *To a large extent the results are as would be expected in an area that has relatively low values and where the majority of development is likely to be in the form of higher density flats (which are more expensive to build than housing). These development forms are shown as unviable, even without affordable housing.*

As set out briefly at 190 above, delivery in the CDA is already challenging. although development is coming forward, on the whole this is enabled by the Council's ongoing interventions in the market (through site assembly, regeneration initiatives and working directly with developers to make its own land available, etc). The details are set out more fully in the response to Matter 6.

As set out in the response to 203 above, through the plan making process, the Council gave careful consideration to seeking 10% affordable housing across all sites (including those in the CDA) not subject to 30% affordable housing so to align with national policy. However, this was decided against as it was felt likely to lead to viability being considered at the development stage that would conclude that affordable housing could not be delivered. This may assist in decisions about whether or not sites are promoted for development.

This question raises space standards. This is an issue that applies across the whole City.

All the modelling in the Whole Plan Viability Study (EB/DI/3) is based on the assumption that space standards apply.

It is a normal requirement that affordable housing taken by housing associations is built to the Decent Homes Standard and meets minimum space standards.

It is important to note that the development appraisals are based on £ per sqm and values and £ per sqm costs – both of which were tested through the technical consultation. The newbuild sales reported by the Land Registry (Table 4.6) has been revisited. The flats vary from 42sqm to 74 sqm, with values ranging from £1,554 per sqm to £2,321 per sqm (average £1,849 per sqm). Almost all are within the LA1 postcode. All these would be greater than space standards. Whilst reducing the size of a unit would reduce the

cost of construction, the value of that unit would also fall.

205. The Planning Practice Guidance states that an increase in the total housing figures included in the Plan may need to be considered where it could help deliver the required number of affordable homes. Has the Council considered this?

The council has considered a higher housing requirement which has been appraised in the Sustainability Appraisal (Appendix A – Detailed Appraisal of Alternatives (SD/4a pages 7-8 of pdf document). The appraisal included a higher requirement of 1,712 homes per annum, as well as 1,680 dwellings per annum. Although both alternatives score more positively than the lower target, it was agreed to keep the target lower in order to keep the unmet need low. Also Reg 18 Plan consulted on a plan target of 1,712 dwellings per annum. However, this target did not include any buffer. Also a strategic site was dropped between Reg 18 and Reg 19 due to availability issues. Therefore, the plan target was reduced taking account of reduced capacities, buffer as well as the new higher need including the 35% uplift.

206. Is it sufficiently clear what would forms 'an exceptional circumstance' to justify off site provision of affordable housing referred to in criterion d) of Policy Ho04?

The exceptional circumstances are likely to be very limited. They are likely to occur in two particular situations.

Firstly, where there are very small parcels of affordable homes. These can be less attractive to housing associations than larger parcels. Rather than forego provision is preferable to collect a commuted sum towards off site provision. This can be aggregated to facilitate the delivery of affordable housing elsewhere – for example in the CDA.

Secondly, in flatted schemes, particularly schemes of specialist older peoples housing that may be subject to significant levels of service charges. Service charges do not sit comfortably in the affordable sector. As above, rather than forego provision it is preferable to collect a commuted sum towards off site provision. This can be aggregated to facilitate the delivery of affordable housing elsewhere.

207. What is the timescale for the preparation of the separate guidance on commuted sums and their calculation, referred to in paragraph 5.28 of the Plan? Would it be consistent with national policy to include this as supplementary guidance, given that the PPG states it is not appropriate to set out new formulaic

approaches to planning obligations in Supplementary Planning Documents or supporting evidence base documents, as these would not be subject to Examination? To be effective should these matters be set out in the Plan?

Commutated sums were considered from paragraph 10.43 of the Whole Plan Viability Study (EB/DI/3). Paragraph 10.53 concluded:

Paragraph 63 of NPPF is clear that off-site provision or financial contribution in lieu 'can be robustly justified'. On this basis, the above calculations provide a sound basis for determining a commuted sum figure. There are two alternatives open to the Council. The first is to work to a published 'standard commuted sum payment'. If LCC were to take this option, we would recommend a £100,000/unit payment per affordable unit not delivered on-site on greenfield sites and £19,000/unit on brownfield sites.

The council would be willing to consider these amounts to be embedded in policy for clarity.

208. Does the evidence in the Whole Plan Viability Study support the proposed viability zones in Diagram 3? Are the boundaries of these zones clear enough for Policy Ho04 to be effective?

Yes. There needs to be a degree of pragmatism when setting policy boundaries that are based on viability as values do not step up and down across roads and other features.

The Ashton green area is a specific site, with its own characteristics that can be clearly mapped.

The same can be said of the CDA, this is an area that is subject to its own policies for many years, and where the vast majority of development is likely to be flatted development.

Through the various iterations of viability evidence, going back to before 2014, it has been recognised that the South East quadrant of the City enjoys better values than elsewhere (see Figure 4.6 and Figure 4.10b of the Whole Plan Viability Assessment). This is reflected in the plan. When originally mapping the South East, some areas that are not considered for development, such as the Hospital and Spinney Park, were not included. This has resulted in a slightly odd shape. Both of these areas could be included, however on balance, as they are consistent with the 2011 Affordable Housing SPD they left unchanged.

As set out earlier, it is timely to note that there are no higher density allocations in either the Ashton Green or the South East

Leicester areas.

The boundaries are already a part of the current affordable housing policy in the adopted Core Strategy and are clearly shown in the Affordable Housing SPD.

Policy Ho05 – Housing Densities

209. Should housing densities in the CDA be guided by design codes and the data collected for the Character Areas rather than the standard figure in Policy Ho05?

The housing densities were increased for the CDA as well as the non-strategic sites between Reg 18 and Reg 19 following a Developers Panel that was conducted as part of the Strategic Housing & Economic Land Availability Assessment. Paragraph 4.2.16 on page 10 of the SHELAA document (EB/HO/3) explains the input of the Developer Panel. The densities for the CDA were also guided by character areas evidence base (EB/CD/10) team.

210. What evidence is there to support the minimum density figure cited in Policy Ho05? In stating a minimum amount of development per hectare would the policy reduce the flexibility / innovation of developers to optimise the use of the land?

As mentioned in the response to Question 209, the densities were guided by a Developer Panel that was conducted as part of SHELAA. and these were increased after Reg 18 in response to consultation responses. The densities in the policy are minimum densities which do not preclude higher densities coming forward at planning application stage.

211. Would Policy Ho05 be effective in optimising the density of development and making effective use of land in line with chapter 11 of the NPPF?

See response to Questions 209 & 210

212. What assumptions have been applied in the SHLAA or other site-specific evidence in terms of the density/capacity of site allocations, particularly where the SA concludes that the overall impact of Policy Ho05 is mixed?

SHELAA sites were assessed at 30dph considering the site area, development ratio which was based on joint Leicester & Leicestershire

methodology cited in para 1.2 and Footnote 3 of (EB/HO/3). However, these were increased for plan allocations following the development industry input. This is explained in paragraphs 4.2.2, 4.2.4 and 4.2.16 in SHELAA (EB/HO/3).

Policy Ho06 – Self-Build and Custom Build

213. What is the demand for Self-Build and Custom Build plots within Leicester?

The Local Housing Needs Assessment Update Addendum 2022 (EB/HO/1a, page 8) identifies that 148 individuals and 95 groups accepted to join Parts 1 and 2 of the register. This is likely to have changed however the monitoring of delivery and need will be taken into account in review of the policy to respond to any updated evidence.

214. Is Policy Ho06 clearly written, effective and positively prepared? Would it be apparent how a decision maker should react to development proposals for housing with regard to any provision of Self-Build and Custom Build plots? Would the policy as draft ensure that sufficient plots are made available to meet the demand for Self-Build and Custom Build Homes?

The reasoned justification included in paragraph 5.32 in the plan mentions that city council will support self-build and custom-build housing as evidenced by the local housing needs study, reference to which will be used when determining the future proposals for self-build / custom-build. The policy has been consulted at all stages of the local plan and no changes were warranted between Reg 18 and Reg 19 (page 26 of Exam 4). The policy has been appraised in the SA (SD/4e – Appendix D – Detailed Appraisal of Local Plan Policies, page 20) which suggests retaining policy without any changes. Policy supports provision of serviced plots for self-build / custom-build as well as provision of custom homes by other delivery routes for major schemes subject to viability and site specific circumstances. The council thinks that the policy is clearly written, effective and positively prepared.

215. Is Policy Ho06 consistent with national policy in the NPPF and PPG in respect of the provision of Self-Build and Custom Build homes?

In identifying and addressing the identified need through the Local Housing Needs Assessment as well as supporting the provision of self-build and custom-build homes through the proposed plan policy,

the council thinks that the policy Ho06 is consistent with national policy (Para 63 of December 2023 NPPF) as well as relevant paragraphs of the Planning Practice Guidance.

Going forwards the policy will be monitored and reviewed as part of the overall monitoring framework in compliance with the Planning Practice Guidance.

216. Should Policy Ho06 set out what should happen to Self-Build/Custom Build plots if they are not developed for this purpose within a set period of time?

It is council's opinion that any such provision would undermine policy.

Policy Ho07 – Internal Space Standards

217. Is the requirement in Policy Ho07 for all new housing to meet the Nationally Described Space Standard as a minimum justified by adequate, proportionate and up to date evidence about need, viability and timing? Does this policy ensure the most efficient use of CDA sites?

The policy has been informed by robust and proportionate evidence [EB/HO/4] as well as Viability assessment which evidences that meeting the NDSS will be viable.

218. Should there be a transitional period between the date of the Local Plan adoption and the date that the NDSS requirement will come into force, in order to allow developers to factor in the cost of space standards into future land acquisitions?

The council thinks there is no justification for any transitional period as most development is already meeting space standards.

Policy Ho08 – Student Accommodation

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

The proposals for student accommodation will be determined against criteria set out in the policy as well as the identified need. Given the criteria it is anticipated that most student housing development will be supported in the CDA which has been identified as a single site within the SHELAA (site 1048). CDA is expected to deliver about 6,286

dwellings as included in the plan strategy.

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

220. Is Policy Ho09 positively prepared, justified, effective and consistent with national policy?

Yes, the Policy has been informed by the Local Housing Needs Assessment (2022) (Submission Document EB/HO/1) and Update Addendum (2022) (Submission Document EB/HO/1a), so it is consistent with national policy (NPPF July 2021, para. 61). The Local Housing Needs Assessment (LHNA) demonstrates that the city's greatest need by property size is for 2- and 3-bedroom dwellings.

An Article 4 Direction relating to Class C4 houses in multiple occupation came into effect in some parts of the city in 2014, and another one covering a greater area of the city came into effect in 2023. The Article 4 Directions remove the permitted development right to change the use of a property from a Class C3 dwelling house to a Class C4 house in multiple occupation in those areas of the city to which the Directions apply. The boundaries of the Article 4 Direction areas are based on areas of the city where HMOs make up 10% or more of the housing stock. The LHNA shows that there is a need for family dwellings. The Article 4 Directions help prevent the loss of family dwellings in areas of the city where many have been changed to HMO use and where, as a consequence, HMOs have become concentrated. Policy Ho09 will also help prevent the loss of family dwellings in those areas by preventing their conversion to flats.

As it has been informed by the LHNA, the Policy complies with the requirement in NPPF (July 2021), para. 35 a) to be positively prepared as it contributes in providing a strategy that seeks to meet the area's objectively assessed needs, the requirement in para. 35 b) to be justified as it is based on proportionate evidence, and the requirement in para. 35 c) as the policy is deliverable over the Plan period.

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

households referred to in criterion b)?

The policy will provide effective guidance regarding how the impact of development proposals on communities will be assessed as the policy wording draws on similar wording in criteria in existing Core Strategy policies CS06 'Housing Strategy' and CS08 'Existing Neighbourhoods', which are well understood by decision makers and applicants and have been effective in maintaining mixed communities.

The criteria are relevant as they contribute to the prevention of concentrations of HMO uses. They are justified as concentrations of HMO uses within an area are associated with detrimental impacts on the locality and cause the loss of family housing when there is a need for their retention, as is evidenced in the LHNA (2022). The criteria are effective as they are based on similarly worded criteria in existing policies which have been effective in preventing concentrations of HMOs.

The methodology referred to in criterion b) is to look at whether there is a HMO Article 4 Direction in place in a given location. This will be determinative as to whether that area is one with a significant concentration of houses in multiple occupation/student households.

Policy Ho11 – Hostels

222. Is there evidence to justify that the approach taken in Policy Ho11 would ensure that it would effectively meet the need for hostel accommodation in the City?

Paragraph 5.46 of the supporting statement confirms that there is "an occasional need for new hostels". This is confirmed by the fact that only one application for a new hostel has been approved in over 10 years, since 2013, as shown in the table below.

20231032	69-73 Regent Road	Installation of replacement windows at rear of hostel
20211515	90 Cavendish Road	COU from office and flat to hostel
20210893	71-73 Stretton Road	Removal of condition 4 (19781224)
20160165	26-28 Mayfield Road and 6-16 St James Terrace	Installation of replacement windows to hostel
20130171	390 -392 Narborough Road	Continuation as a hostel

Based on this evidence, the council is satisfied that Policy H011 would effectively meet the need for hostel accommodation in the City.

223. To positively plan for a mix of housing, should this policy seek to resist the loss of existing hostel accommodation or require it to be replaced elsewhere if lost?

The relatively low demand for hostels is confirmed by a greater number of applications (five), gaining consent for alternative uses of hostels, during the same period that only one new hostel was granted consent.

20170196	12-14 St Stephens Road	Change of use from a hostel to a house in multiple occupation
20151938	31-35 Lower Hastings Road	Change of use from a hostel to 8 flats
20141860	129 Loughborough Road	Change of use from a hostel to 9 flats
20140979	113 Elmfield Avenue	Change of use from a hostel to 4 flats
20130814	34-38 Upper Tichbourne Street	Change of use from a hostel to 14 residential units

Based on this evidence, the Council is satisfied that there is not a need to resist the loss of hostel accommodation, or to seek replacement hostel accommodation elsewhere (see also MIQ 222).

Policy Ho12 – Gypsy and Traveller Accommodation

224. Does the Gypsy and Traveller Accommodation Assessment (GTAA) [EB/HO/2 and 2a] provide a robust evidence base to establish the need for Gypsy and Traveller accommodation in the City to 2036, including the needs of 'unknown' households and households that do not meet the definition of Gypsies and Travellers in Annex 1 of the Planning Policy for Traveller Sites (PPTS), taking account of the amended definition of Gypsies and Travellers in the December 2023 update to the PPTS?

The Council considers that the Gypsy and Traveller Accommodation Assessment (GTAA) May 2017 and the GTAA Addendum Report September 2019 [EB/HO/2 and 2a] provided robust evidence to establish the need for Gypsy and Traveller Accommodation in the city to 2036. Both the GTAA 2017 and 2019 Addendum Report considered the accommodation needs of gypsy and travellers who met the planning

definition, the needs of “unknown” households and those did not meet the planning definition.

It is important to note that the evidence base studies were undertaken and the Leicester Local Plan [SD2] was drafted and submitted, before the definition of Gypsies and Travellers was changed in the December 2023 update to the PPTS. Therefore, the 2017 and 2019 GTAA’s [EB/HO/2 and 2a] do not take into account the amended definition.

This question of the amended definition was first raised in the Inspectors Initial Questions [Exam 2]. In the Council’s response [Exam 3] to the Inspector’s Initial Questions, the Council stated that *“it had commissioned updated evidence to consider the Smith vs SSLUHC case in response to change in the definition of “gypsies and travellers” in the update of the Planning Policy for Traveller Sites, published by the Government on 19 December 2023”*.

New 2024 GTAA – Findings

The Council received the new 2024 GTAA in early September 2024. The findings of this study are outlined below.

2024 GTAA - Gypsy and Traveller pitches (permanent sites)

The table below shows the identified need for Gypsy and Traveller permanent pitches (over the GTAA period) in the new 2024 GTAA:

Table 1:

Delivery status	Gypsy & Traveller Policy				Total
	24-28	29-33	34-36	37-38	
Meet Planning Definition	3	2	1	1	7
	Housing Policy				
Do not meet Planning Definition	17	4	5	2	28
Total	20	6	6	3	35

Table 1 shows that there is a need in Leicester for

- 7 pitches for Gypsy and Traveller households that met the 2023 PPTS planning definition.
- No pitches for undetermined Gypsy and Traveller households that may meet the planning definition. (N.B. Due to 100% response rate)

- 28 pitches for Gypsy and Traveller households who did not meet the planning definition.
- Overall, there is a total need in the city for 35 permanent pitches over the GTAA period.

The submission Local Plan goes up to 2036, which reduces the overall need to 32 pitches. It is this figure that, with the benefit of hindsight, we should address in the Local Plan.

N.B. This is an increase on the level of need identified in the previous 2017 and 2019 GTAAs.

2024 GTAA - Gypsy and Traveller (Transit Provision)

The new 2024 GTAA identifies a need for 1 formal public transit site that can accommodate **12 caravan spaces**.

N.B. The identified need for transit provision remains the same as that identified in the previous 2017 and 2019 GTAAs.

2024 GTAA – Travelling Showpeople Plots/ Yards

The table below shows the identified need for the number of additional plots needed over the 2024 GTAA period.

Table 2

Status	2024-2038
Meet Planning Definition	6
Undetermined	2
Do not meet Planning Definition	0
Total	8

Table 3

Year Period	Dates	Need
0-5 years	2024-28	4
6-10	2029-33	2
11-13	2034-36	0
14-15	2037-28	0
0-15	2024-38	6

- 6 plots for travelling showpeople households that met the 2023 PPTS planning definition.
- 2 plots for travelling showpeople households that that may meet the planning definition.
- 0 plots for travelling showpeople households that did not meet the planning definition.

N.B. This is an increase on the level of need identified in the previous 2017 and 2019 GTAA's.

Submission Local Plan and 2017 & 2019 GTAA's

This section considers the level of need identified in the 2017 & 2019 GTAA, how it was accommodated in the Submission Local Plan against the level of need arising from the 2024 GTAA and the shortfall against Local Plan provision.

Submission Local Plan - Gypsy and Traveller (Permanent sites)

The table sets out the identified need for Gypsy and Traveller permanent pitches in the 2017 & 2019 GTAA's.

Table 4:

Delivery status	Gypsy & Traveller Policy				Total
	2016-21	2021-26	3026-31	2031 - 36	
Met Planning Definition (+25% Undetermined)	4	1	2	0	7
	Housing Policy				
Do not meet Planning Definition (+75% undetermined)	9	3	4	5	21
Total	13	4	6	5	28

The Submission Local Plan proposes an allocation on Western Park Golf course (Policy SL06 Strategic Site 5: Beaumont Park) that would provide 7 permanent pitches. The site would accommodate the identified need arising from gypsy and traveller households that met the planning definition and together with 25% from undetermined households.

The need for 21 pitches that came from gypsy and traveller households that did not meet or are unlikely to meet the planning definition would have been assessed through the plan policies to deliver the local housing needs assessment or the criteria-based Policy Ho12: Gypsy, Traveller and Travelling Showpeople.

Shortfall – from new 2024 GTAA

In the next 5 years the proposed allocation on Western Park golf course in the Submission Local Plan is capable of providing 3 pitches for gypsy and travellers that meet the planning definition and 4 for those that do not from the 2024 GTAA.

Submission Local Plan & Transit Provision

The level of need identified for transit provision in the 2017 GTAA and 2019 Addendum Report [EB/HO/2 and 2a] was for 1 formal public transit site that could accommodate **12 caravan spaces**. The level of need for transit provision in the new 2024 GTAA remains the same.

The submission Local Plan proposes two sites:

- Policy SL06: Beaumont Park; and
- Policy E01: Non-Strategic Economic Development Areas (Thurcaston Rd /Hadrian) Road open space propose two allocations for a transit site.

The Submission Local Plan provides more transit sites than is needed therefore.

Submission Local Plan – Travelling Showpeople

The 2017 and 2019 GTAAs identified the need for 2 travelling showpeople plots. That level of identified need which could have been accommodated within the existing yard at Bath Lane. The Council therefore did not need to identify any sites to accommodate the extent of the identified need.

Shortfall

The new identified in the new 2024 GTAA increases the level of need for additional travelling showpeople plots from 2 to 8. It is not possible to accommodate the overall need on the existing site.

Proposed DPD

The Council acknowledges that the new 2024 GTAA identifies the need for more gypsy and travel permanent pitches and travelling show people sites that we have accommodated in the Submission Local Plan within

the plan period to 2036. This is due to a very late change to the planning definition of Gypsy and Travellers that happened in 2023, after the Local Plan had been submitted.

The Council is of the opinion that the additional need to what is set out in our Submission Plan cannot adequately be addressed at this point. For the Council to do so would involve pausing the local plan in order to identify additional sites which is unlikely to be a straightforward exercise.

Accordingly, rather than further delaying the adoption of the local Plan, and mindful that immediate needs (i.e. the needs for years immediately after adoption) will be met the Council proposes to deal with the additional need through a standalone DPD, and for work to start upon such DPD now. We have outlined a timetable to deal with this as soon as possible.

Stage	Date
Evidence consultation and SEA Scoping Report	January to February 2025 (with preliminary work in 2024 in advance of adoption of the current Local Plan)
Draft DPD and SEA-SA Draft Report	June to July 2025
Submission draft DPD and final SEA-SA report	December 2025 to January 2026
DPD Examination	April to May 2026
Inspectors draft report	July 2026
Modifications consultation	September 2026
Inspectors final report	December 2026
Adoption	Early 2027

The Council wants to find a practical way forward to address this specific issue without delaying adoption of the Local Plan as whole, which we see as critical. The proposed allocations in this plan would still be considered at the Examination in October and November 2024.

The proposed allocations in the Local Plan would allow us to meet some of the need identified need for gypsy and traveller permanent pitches and travelling showpeople from the 2024 GTAA in the next 5 years. The allocation for transit provision would meet the identified need in full. In addition, Policy Ho12 (Gypsy, Traveller and Travelling Showpeople) in the submission plan is a criteria-based policy, which could be used to consider applications for new gypsy and traveller and travelling showpeople sites that might come forward before the Gypsy and Traveller DPD is adopted.

225. Does Policy Ho12 provide for the accommodation needs of Gypsy and Traveller households, who are in need of culturally appropriate accommodation, but who do not meet the definition of Gypsies and Travellers in Annex 1 of the PPTS, as revised?

Paragraph 5.61 states that the "The criteria below will be applied to all applications for new Gypsy and Traveller and travelling showpeople sites...." Therefore, the Council would use Policy Ho12 to assess an application for Gypsy and Traveller households, who are in need of culturally appropriate accommodation, but who do not meet the definition of Gypsies and Travellers in Annex 1 of the PPTS as revised. It is noteworthy that the definition of Gypsies and Travellers in Annex 1 of the PPTS was revised only after the Council had drafted this policy and submitted its Local Plan. The change in definition was in response to a change in law. The Council will consider a modification to the supporting text to make it clearer that the policy also applies to those who do not meet the definition of Gypsies and Travellers in Annex 1 of the PPTS, as revised.

226. Are the principles in Policy Ho12 for determining proposals for Gypsy, Traveller and Travelling Showpeople sites consistent with national policy in the PPTS?

The Council is of the opinion that the criteria in policy Ho12 is broadly consistent with national policy in the PPTS without directly duplicating it. However, there are some criteria in the PPTS that are not specifically addressed in policy H012 itself, such as reference to Health and wellbeing, flooding, noise and air quality. Instead, these issues are covered by other policies in the Local Plan e.g. HW01 – Health and Wellbeing, CCFR06 - Managing Flood Risk plan Sustainable Drainage Systems, DQP06. Residential Amenity, which covers noise and T02 Climate Change and Air quality.

The Council is of the opinion that individual policies contained within the Local Plan should not be viewed in isolation. Other policies will be used to satisfactorily assess an application for new gypsy and traveller and travelling showpeople sites in accordance with the criteria set out in national policy (PPTS). In drafting the Local Plan, the Council has sought to avoid unnecessary repetition of policies throughout the plan.

227. Are the two sites identified for transit sites (SL06 and E01) suitable and appropriate for residential uses being located within employment areas?

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.

Please ask for: Joseph Martin

Direct Line: [REDACTED]



Our Ref: 1051 Gilmorton Community Rooms/Hopyard Close

Date: 27 September 2024

**Leicester Local Plan 2020-2036 Examination
Site 1051- Housing Proposal**

Dear Sirs

Re: 1051 Gilmorton Community Rooms/Hopyard Close

I write with reference to the proposed small land allocation for redevelopment of site number 1051 Gilmorton Community Rooms/Hopyard Close within the City of Leicester Submission Draft Local plan. I now confirm as landowner/promoter of the site, we are not in a position to confirm deliverability of a redevelopment scheme in terms of NPPF and Planning Policy Guidance requirements at this stage, and confirm the withdrawal of the proposal from the Local Plan process.

Should a Business Case and funding for a future proposal to redevelop the site be identified, then this would be progressed through the council's usual scrutiny and decision taking process with a view to being delivered through a specific planning application post adoption of the Leicester Local Plan

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[REDACTED]

Matthew Wallace
Director
Estates and Building Services