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**Leicester Local Plan  
2020 to 2036**

# **Housing and Sites Topic Paper**





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# **Housing and Sites**

## **Topic Paper**

Submission document  
September 2023

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## Introduction

This topic paper supports the housing evidence that informs the local plan. The paper is split into two parts:

- Part one of the topic paper sets out the approach that has been used to identify the housing need and the requirement for the local plan. This part of the paper also includes a brief section on housing supply, delivery, affordable housing and plan viability.
- Part two of this paper sets out how sites have been selected to meet the local plan housing target.

# Part 1. Approach to identifying Housing Need

## 1. National context and background

1.1. The NPPF requires local planning authorities to calculate the local housing needs for their local areas. The Planning Practice Guidance (PPG) prescribes the calculation of the housing need based on the standard methodology using 2014 household projections and the latest affordability ratios published at the time of calculating. The Planning Practice Guidance also requires a 35% uplift over the minimum housing need for a number of major cities, which includes Leicester.

1.2. In order to meet the Government's objective of significantly boosting the housing supply, the NPPF requires local planning authorities to identify a sufficient supply and mix of housing sites, taking into account their suitability, availability and achievability. The framework requires Local Plans to identify a supply of specific, deliverable sites for first five years of the plan period with an appropriate buffer as well as specific, developable sites for years 6-10, 11-15 years and beyond where possible.

1.3. Leicester & Leicestershire authorities have a strong history of partnership and engagement of working together to address any cross-boundary strategic matters including housing and employment. A Statement of Common Ground (SoCG) June 2022 has been agreed between partners to distribute the unmet housing and employment need from Leicester to neighbouring districts within the Housing Market Area (HMA). The SoCG is yet to be signed by two authorities, Harborough District Council and Hinckley and Bosworth Borough Council.



## 2. Plan period

2.1. Para 22 of the NPPF requires that strategic policies should look ahead over a minimum 15 year period from adoption to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. The work on new Leicester local plan commenced in 2014. The first consultation on Issues and Options took place in 2014, followed by Emerging Options Consultation in 2017 and Regulation 18 consultation in 2020, a timescale which was significantly affected by COVID 19. The 35% Urban Uplift announced just after the conclusion of the Regulation 18 Plan consultation was a significant factor in terms of delay to the Plan. Work to develop, procure and approve an evidenced based methodology and secure agreement of partner councils to a revised Statement of Common Ground substantially delayed the Plan. If adopted in 2024, the Local Plan would have a plan period of 11 years

2.2. The current development plan comprises of the 2006 adopted local plan and 2014 Core Strategy. Leicester cannot currently identify a five year supply of housing and as such, relevant policies are out of date. Therefore, it is important to produce and adopt a new plan as soon as practically possible. The City appreciates that having a shorter plan period may have implications and consideration has been given to increasing the length of the plan period, however, this would lead to significant delays in the overall timetable as our existing evidence currently goes up to 2036. This would also undermine the Government's priority of delivering sufficient homes, and to progress local plans without significant delays.

2.3. In addition, paragraph 33 of the NPPF requires that policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Given the forthcoming changes to the NPPF, it is more than likely that we will be required to review the plan sooner than 5 years. Any review post adoption will be an opportunity to address the plan period. In view of the fact that we will

be seeking to review the plan sooner rather than later, we do not consider any serious implications of having a shorter plan period.

2.4. As mentioned above, a statement of common ground relating to unmet housing and employment need has been agreed between partners with the HMA. By extending the plan period now, the city would have a higher overall housing need which would in turn increase unmet need and require a new negotiation and partnership agreement which could be very difficult to secure in the light of forthcoming Government changes to the Planning system. Having an up to date plan will also help other plans in the Housing Market Area progress without significant delays from the city.

### **3. Leicester's Housing Need and Requirement**

3.1. The NPPF defines local housing need as the number of homes identified as being needed through the application of the standard method set out in the Planning Practice Guidance. As set out in paragraph 61 of the NPPF, Leicester's housing need is informed by the local housing needs assessment using the standard method.

3.2. The overall housing need identified for Leicester is 39,424 homes over the plan period (2,464 dwellings per annum for 2020-36). This includes the 35% major cities and urban centres uplift introduced by the Government in 2020. This explained in more detail in the Local Housing Needs Assessment February 2022 evidence study.

3.3. However, as Leicester is a constrained authority (tight administrative boundary and limited land availability), the overall housing need cannot be met within the city boundary. The NPPF requires that the plan making authorities should establish a housing requirement figure for their area which shows the extent to which their identified housing need can be met over the plan period (para 66).

3.4. An evidenced supply of about 23,010 homes as of 31st March 2022 has been anticipated to contribute to meeting the housing need in the city. The local plan housing target is based on the anticipated supply that the city can achieve within the plan period. However, considering potential delays or changes in circumstances that may render any sites coming forward during the plan period, a housing requirement of 20,730 dwellings has been proposed in the plan (c. 1,296 dwellings per annum) which includes a buffer of about 11%. This leaves the city with an unmet need of 18,694 homes over the plan period. Further details of how the city's housing supply is calculated is included in the Housing Sites Methodology (2022).

3.5. Notwithstanding the above, the council has published a couple of scenarios for the first five year supply from the date of adoption. This is contained in the Strategic Housing & Economic Land Availability Assessment September 2022 (SHELAA). The NPPF requires authorities to identify a supply of specific deliverable sites sufficient to provide 5 years' worth of housing against their housing requirement with an additional buffer to ensure choice

and competition in the market (Para 73a). The City Council will have 6.7 years of supply upon adoption of the plan in 2024. This uses the scenario that the apportionment of housing unmet need as per the Statement of Common Ground (June 2022) will be agreed and signed by all partners within the HMA. At present, only Harborough District Council and Hinckley & Bosworth Borough Council are yet to sign the Statement of Common Ground. Harborough District Council are intending to make a decision on the Statement of Common Ground on the 18th September.

### **Unmet need**

3.6. It should be noted that the city declared unmet housing need of approximately 7,742 homes at Regulation 18 which was subject to consultation between September and December 2020. This unmet need was based on the previous overall housing need of about 29,478 dwellings using the standard method before the 35% uplift was introduced in December 2020. Partners within the HMA were already proactively working towards a Statement of Common Ground at that time to address unmet need from the city.

3.7. Para 35 Planning Practice Guidance (PPG) requires the increase in number of homes from 35% uplift to be met by the cities and urban centres rather than surrounding areas unless it conflicts with national policy and legal obligations. The need in the first instance should be met by prioritising brownfield development and under-utilised sites promoting the most efficient use of land through density optimisation in order to ensure sustainable development. The City Council plans to achieve this through the anticipated supply which is explained in more detail below, and in the local plan housing chapter (paras 5.5 – 5.12). About 30% of the housing supply is planned to be met within the Central Development Area, while development from greenfield sites including large strategic sites (9%) and smaller sites (around 6%) outside the CDA is expected to be approximately 15%. As such our overall supply proposes to deliver over 50% of our need including the 35% uplift requirement within the city boundaries and the remaining unmet need is covered by the Statement of Common Ground.

3.8. As mentioned above, Harborough District Council and Hinckley & Bosworth Borough Council are yet to sign the Statement of Common Ground. Discussions within the HMA are ongoing and an update on this issue will be provided in due course.

3.9. It should also be noted that the SoCG, apportionment of unmet need and the evidence that sits behind it, were considered as part of Charnwood's examination in October 2023. A copy of Inspector's letter from November 2022 is attached in appendix 1.

## **4. Housing supply and delivery**

4.1. To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward to meet the identified need (NPPF Para 60). Site selection, deliverability and achievability of sites within the local plan has been explained in detail in part 2. This part of the paper includes high level explanation about the components of overall housing supply, which are also covered in the Sites Assessment Methodology, November 2022 evidence.

### **Past delivery**

4.2. The council has a good track record of housing delivery over the past few years. This includes development at Ashton Green, Hamilton, the Waterside, the city centre, and numerous other areas. An average of about 1,168 homes were delivered per year between 2012 and 2022. The Council has delivered 3,935 homes in last three years against the requirement of 3,908 homes, as published in the 2021 Housing Delivery Test results. This equates to 101% delivery. Past delivery performance can be viewed in the Authority Monitoring Report 2019-21.

### **Substantial Investment in Leicester**

4.3. Substantial investment (around £50 million) in the Central Development Area through Connecting Leicester project has contributed into making the area more attractive for housing. Over recent years there has been substantial investment in the Highcross shopping centre, Haymarket, and facilities such as the Curve & Performing Arts Centre and St. Margaret's Bus station and the Railway Station. Other substantial investment has been made at the Phoenix Arts Centre, schools and health centres as well as provision of new housing schemes across the city e.g. Ashton Green and the Waterside Regeneration Area.

4.4. A dedicated development team in the council facilitates pro-active development on council owned sites in the city through providing pre-application advice and liaising with the builders and agents to bring forward the large strategic sites. In addition, our housing development service supports the delivery of affordable housing on council owned sites within the city.

## **Commitments**

4.5. The housing supply included in the local plan and the evidence base is based on the commitments and completions until March 2022. About 1,892 dwellings were completed between 2020-22 and have been considered in the supply.

4.6. The NPPF requires planning policies to identify a supply of specific, deliverable sites for first five years of the plan period, and specific, developable sites for 6-10 years and beyond where possible. Extant outline and full planning permissions up to 31st March 2022 have been included in the commitments to contribute to the overall housing supply. This includes student and older people's housing with the appropriate conversion rate applied. A total of 9,410 dwellings (about 45%) will be met through commitments. Depending upon the status of a consents, these are likely to come forward within the first five years, or between 6-10 years.

4.7. An update on the deliverability and achievability of these sites has been done as part of the SHELAA 2022 update. A further update on the completions and commitments will be prepared and produced as part of the examination.

## **Central Development Area (CDA)**

4.8. The Central Development Area (CDA) will be a key focus for housing development over the whole of the plan period and will be expected to pick up any shortfall in delivery beyond what has already been considered, especially if there is any delay to the strategic sites or smaller allocated sites outside of the CDA. The council has a good track of delivery within this area which includes the delivery of a range of different housing types from family housing within the Waterside area, to apartment led one/two bed housing schemes elsewhere. Over the last 5 years the CDA has contributed on average 628 dwellings per annum. However, to provide a median expectation to manage fluctuation of delivery, the CDA deliverability is currently considered to come forward equally through the plan period. It is therefore anticipated that a minimum of 6,286 supply of homes is projected to come forward within the plan period based on the council's calculations and work prepared by independent consultancy PlanitIE. As stated within the draft plan, the council will on adoption of the local plan produce a suite of character area SPDs which will provide further details around delivery within the CDA. The council is working with and will continue

to work with government bodies such as Homes England to help unlock more difficult to develop sites within the area.

### **Increasing densities within the CDA from 50 to 75 dph**

4.9. In the previous Regulation 18 draft the council initially proposed that within the CDA the council would seek a minimum of 50dph to help meet the NPPF's requirement for efficient use of land. Following representations made at Regulation 18, which strongly suggested the council increase densities, the council made the decision at Regulation 19 to increase the density figures within the plan.

4.10. Within the CDA the increase in density does not however improve the viability, but instead further increase the council's commitment to ensuring an efficient use of land within the CDA area.

### **Site allocations**

4.11. Outside of the CDA, the Council have identified a number of strategic and non-strategic sites to help meet the housing need. The larger strategic sites will be supported through masterplanning and joint working with partners for delivery. Further promotional work will be undertaken to support the achievability of strategic sites. The process for identifying these sites is detailed further in part 2 of this topic paper.

4.12. The delivery of sites outside the CDA has been informed thorough engagement with the landowners. This has informed the timescales of delivery for individual sites, which has informed the overall trajectory included in Appendix 1 of the plan. This information will be updated as part of the examination. This is explained in more detail in part 2 of this paper.



## **5. Affordable Housing and Plan Viability**

### **Affordable Housing**

5.1. NPPF requires the on-site provision of affordable homes from all major development (10 dwellings or more). Only in exceptional circumstances off-site contributions will be acceptable. Leicester has an overall affordable housing need of 1,117 dwellings per annum (17,871 affordable homes for the plan period). This will be sought to be achieved in accordance with the housing mix suggested in the local housing needs assessment or any subsequent evidence. Taking into account plan viability, the council will require 30% affordable homes of the total number of dwellings on all major greenfield sites development. On brownfield sites in the South East of the city and in Ashton Green (Diagram 3 on page 58 of the local plan), 10% affordable housing of the total number of dwellings will be required.

### **Plan Viability**

5.2. The Council has undertaken a viability assessment of the local plan to support both the Regulation 18 and 19 consultations and has been used to shape the policy approach within the plan.

5.3. The plan is informed by the 'Whole Plan Viability Assessment' (2019). An update and refresh was completed last year (2022) to address changes in values and costs, changes in national policy and the refinement of the draft policies. The viability evidence has prepared in accordance with the requirements of the NPPF and PPG. The reports follow the Harmen Guidance and are in accordance with the relevant RICS Guidance, including incorporating a period of consultation with the development industry.

5.4. The refined plan incorporates Council's priorities around climate change mitigation, the national described space standards and requirements around high quality design in new buildings. The impact of these additional requirements are considered with the viability evidence.

5.5. The viability studies confirm the Council's own experience of development and shows that viability within parts of Leicester is challenging although this varies depending on the area. The Council has reflected the advice set out in the 2022 Viability Assessment in its policies, adopting a 30% affordable housing target on greenfield sites and a 10% affordable housing target on

brownfield sites in the South East of the city and within the Ashton Green area. Such a policy would not put the local plan at risk (when considered with the Council’s wider policy aspirations).

5.6. Across the city, in almost all the scenarios modelled, brownfield development is shown as unviable and unable to bear developer contributions. To some extent this aligns with what is happening on the ground with development. However, it is clear that development is coming forward on brownfield sites, and in some cases is making modest developer contributions (in particular towards public open-space). The Council should be cautious about relying on the brownfield sites, including those in the Central Development Area (for example within the five-year land supply assessment).

5.7. The main conclusions of the viability evidence shows that the plan is both viable and deliverable as per the definitions set out within the NPPF and PPG. The viability evidence was updated in 2022 the council is confident that the study is still up to date. The most recent published data suggests that average build costs have increased by about 6.6%, however the average price of newbuild homes has increased by about 13.5% (the value of existing homes is unchanged).

**Table 1. BCIS - Estate Housing Generally**

1.7.23	£1,467		
9.4.22	£1,376	£91	6.61%

**Table 2. Land Registry - Average Values (13/7/23)**

	All	Detached	Semi-detached	Terraced	Flats	Newbuild	Existing
2022-08	£228,246	£406,800	£260,891	£205,000	£151,269	£325,839	£223,306
2023-02						£369,931	£227,775
2023-04	£232,236	£421,487	£267,488	£205,772	£154,019		
	£3,990	£14,687	£6,597	£772	£2,750	£44,092	£4,469
	1.75%	3.61%	2.53%	0.38%	1.82%	13.53%	2.00%

5.8. To ensure that the plan is viable, the council has had to make some difficult decisions around what overall developer contributions can be sought. In particular, the challenges of development within the CDA means that whilst the council is confident that requirements around the likes of Biodiversity Net Gain and the Nationally Described Space Standards (NDSS) can be met, the council is proposing a zero rate of affordable housing to ensure continued delivery of residential development within this area. Within the rest of the city the council is confident that on greenfield sites a 30% affordable housing requirement can be met. The council will also be seeking a modest level (10%) of affordable housing on 'brownfield' sites within areas of higher viability such as south east and Ashton Green.

## Part 2: Site Allocations and Site Selection Process

### 1. Introduction

1.1. Part two of this Topic Paper sets out how the Council has assessed and allocated sites to meet its proposed housing and employment targets for the Local Plan 2020-2036.

1.2. It sets out which data was used to help inform site selection decisions, the framework for this selection process and the objectives that will be achieved in the context of the wider Local Plan.

1.3. The allocated sites have been informed by a range of evidence-based documents and deliverability information which coincide with the overall plan's objectives to achieve sustainable development.

1.4. The Submission Local Plan has identified a total of 58 sites, outside of the Central Development Area (CDA), to help meet the housing, employment, educational and other needs of the city. This topic paper does not provide detail of the site assessment process for sites within the CDA, as this has been carried out separately within the CDA Capacity Study included in submission documents.

1.5. Following the Regulation 19 consultation, a few potential changes to sites have been identified. The Council have calculated these changes will not have on adverse impact on overall housing supply and housing buffer. Therefore, this is not significant enough to warrant a strategy change.

1.6. This topic paper and justification for site allocations should be read alongside the Submission Local Plan (Regulation 19) and the policies contained within it. The main policies from the Submission Plan that relate to site allocation are Policies Ho01, E01 and Appendix 6 (non-strategic site allocations) and Policies SL01-SL06 (Strategic site allocations).

## **2. Policy Context**

### **National Planning Policy**

2.1. The preparation of the Local Plan needs to be carried out in accordance with both the National Planning Policy Framework (NPPF) and National Planning Policy Guidance (PPG).

2.2. Section 23 of the NPPF requires provision for an allocation of sufficient sites to deliver the strategic priorities of the area. In order to meet housing and employment needs, the allocation of sites will help to deliver much needed housing/employment land to meet Leicester's housing and employment needs.

2.3. Paragraph 60 further explains that a sufficient amount and variety of land should be demonstrated to come forward where it is needed without unnecessary delay.

2.4. Local Planning Authorities have a Duty to Cooperate with each other on strategic matters that cross administrative boundaries (NPPF, para 24). Allocated sites that border onto neighbouring authorities would need to be considered within this duty and relevant Statement of Common Grounds prepared.

2.5. To make the Local Plan justifiable, the NPPF seeks "an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence" (para 35). Site assessment would be required to provide a robust analysis to justify development locations and take account of alternatives. The site selection process should align with the vision to allocate sites that meet with the three pillars of sustainability.

2.6. PPG provides further information and guidance on how plans can make effective use of the land and contribute to housing supply and delivery.

### **Local Plan context**

2.7. As detailed above, the Local Plan is required to allocate sites to meet strategic needs. The policies and sites contained within the Submission Local Plan have been produced to replace the policies and site allocations contained within City of Leicester Local Plan (2006) and Core Strategy (2014) once the plan is adopted.

2.8. Historically, housing development proposals were allocated within, and guided by, the Saved Policies H01 and H02 as part of the City of Leicester Local Plan (2006), expanded updated detail of the policies has been further developed in the Core Strategy (2014) in policies CS1 and CS6.

2.9. The site allocations relating to the 2006 Leicester Local Plan are identified on the 2006 policies map as 'Housing proposals' and 'Employment proposals'. Both of which are proposed to be replaced by new site allocations and land uses in the Submission Local Plan.

2.10. A small proportion of the site allocations proposed have been carried forward from the 2006 Local Plan to the Submission Local Plan. For example, land at the former allotments on Lanesborough Road has been included for housing allocation as part of a Council owned desire to develop this site. Later phases of larger development sites such as land at Ashton Green and land at Heacham Drive have also been proposed as urban extensions of these site allocations.

### **3. Site Assessment**

3.1. All potential site allocations are required to undergo a rigorous site assessment for potential suitability. Sustainable alternatives, proportionate evidence and site sufficiency to address the need are vital components to consider.

3.2. The assessment used to support the plan and allocated sites has been prepared considering this guidance process on site selection and addressing housing needs.

3.3. The Council has chosen to address these requirements through the framework outlined in the Site Assessment Methodology, which outlines the Council's methodology for addressing site assessments and subsequently allocating sites. The methodology has been compiled by Leicester City Council and approved by all Local Authorities within the Leicester and Leicestershire Housing Market Area.

3.4. The overall process was guided by the following framework which is outlined in the site methodology paper.

Stage 1: Initial site identification

Stage 2: Suitability assessment including the stakeholders comments

Stage 3: Accordance with spatial, strategic and sustainability objectives of the Local Plan

Stage 4: Viability/deliverability including the stakeholders responses

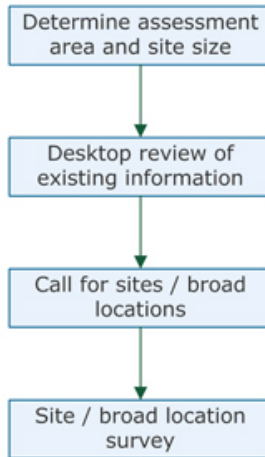
Stage 5: Allocations in the Local Plan

3.5. This section further explores the detail of the assessment methodology. The process analysed how the sites were identified as potential housing and employment sites to meet the identified needs for Leicester. Key inputs to meeting with the objectives of the methodology was application of assessment criteria, proportionate evidence and stakeholder engagement.

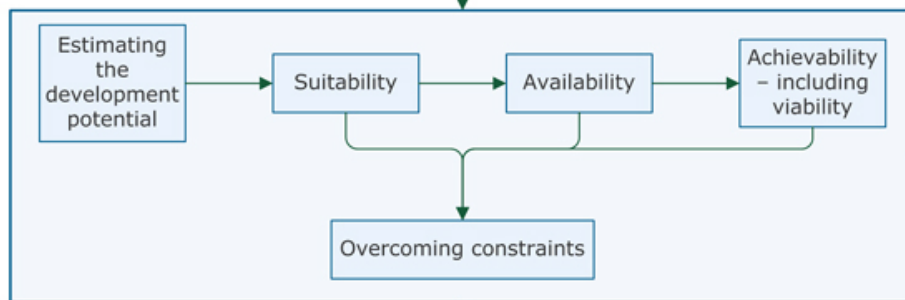
#### **Planning Practice Guidance for site assessment**

3.6. Planning Policy Guidance requires that the following process should be followed to ensure site developability and in order to complete a SHELA:

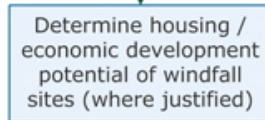
**Stage 1- Site / broad location identification**



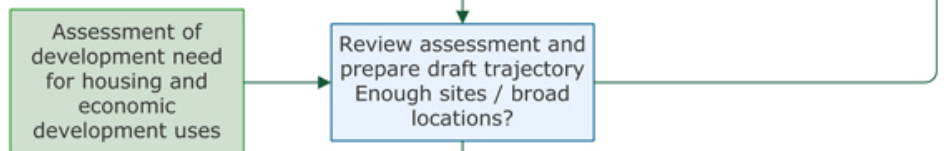
**Stage 2 - Site / broad location assessment**



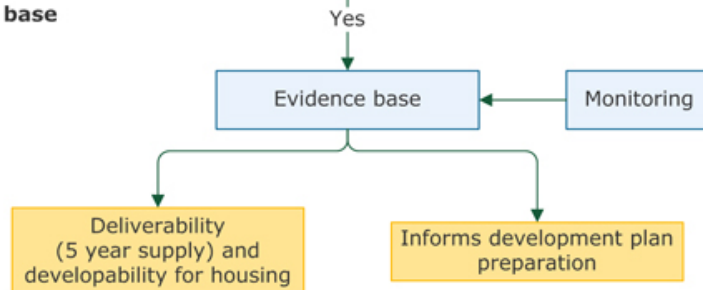
**Stage 3 - Windfall assessment**



**Stage 4 - Assessment review**



**Stage 5 - Final evidence base**



**Site identification**

3.7. The assessment process started by searching for a pool of potential available sites within the Leicester administrative boundaries.



3.8. The Council have utilised a range of sources to achieve this goal. The main engagement applied to complete this is outlined below:

- An online call for sites inviting people to submit details of sites available for development
- Submission of council owned available land to the Planning Policy team by relevant departments
- Submission of sites assessed by other evidence as being of low quality and suggested for deletion as part of the Local Plan updates (e.g. employment sites)
- Submission of sites in response to each of the Local Plan consultations

3.9. Strategic Housing and Economic Land Availability Assessment (SHELAA)

The next stage introduced the element of the Strategic Housing and Economic Land Availability Assessment (SHELAA) which overlaps with the site assessment process. NPPF paragraph 68 requires that a SHELAA should be prepared to help identify a sufficient mix of sites. The production of the SHELAA has been seen as an important evidence source to help identify the future supply of land that is suitable, available and achievable for development.

3.10. Each of the sites submitted to the Council have been added into the SHELAA, which was used as the first stage of site assessment. Alongside sites sourced above, this also includes sites that have received planning permission to give further ideas of potential supply.

3.11. The SHELAA site assessment methodology has been agreed as a fair approach to the high level assessment of suitability, availability and achievability of sites. This has been agreed between the authorities within the Leicester and Leicestershire Housing Market Area (HMA).

3.12. The Council's approach to the SHELAA included a mix of sites, including analysis of educational, office and tourism uses. A total of 1056 sites were examined as part of this process.

3.13. The approach to assessment of all 1056 sites consisted of utilising identified red constraints (e.g. Floodzone 3b, scheduled monuments and Hazardous Facilities) and a site size threshold of 0.25 Hectares (or 5 dwellings), to provide a high-level assessment of all submitted sites.

3.14. Further to this, the process consisted of a high-level estimation of developability, capacities and timescales. Assessment was informed by officer judgement with some input from developers and landowners.

3.15. Site suitability, availability and achievability provided the overall conclusions of whether a site could be taken forward to the next stage of assessment.

3.16. From the findings, a SHELAA report was published as part of the Regulation 19 consultation, outlining all sites that could potentially contribute to housing and employment supply. For the purposes of this consultation and submission to the Secretary of State, sites included within the published SHELAA are up to date as of May 2022. Any sites that have been submitted after this point, and as part of Regulation 19 consultation, will be considered within any Local Plan and SHELAA updates.

3.17. It should be noted that the SHELAA database is an active database and will continue to be reviewed as part of Government requirements and in engagement with stakeholders. Factors such as land availability and updated capacities will be updated as necessary. To maintain an up-to-date dataset, the Council will commit to updating the SHELAA on a yearly basis.

3.18. Discounted sites and sites that have received planning permission were included in the SHELAA report to give an indication of potential housing supply. Unless a circumstance altered the number of dwellings (e.g. an approved planning permission, an unmitigable site constraint), the report details densities as 30 dwellings per hectare. This was done to apply a policy off but proportionate approach. However, this does not preclude higher densities being brought forward where appropriate for the site's context.

3.19. Following the analysis of sites contained within the SHELAA assessment, the council identified that a total of 433 sites (418 during Regulation 18) as potentially be suitable for site allocations in the Local Plan. These sites then progressed onto the next stage of site assessment to further assess suitability in finer detail.

## **4. Site Suitability Assessment**

4.1. In line with the PPG, the Council has produced and applied a site assessment methodology which builds upon the SHELAA site methodology.

4.2. This approach provided a consistent and proportionate approach to the overall assessment of sites for housing and employment allocation within the Local Plan. The applied approach was used across all areas of the city to ensure that development was balanced proportionately across the city and ensured a consistent approach.

### **Assessing constraints**

4.3. The 433 sites assessed as suitable within the SHELAA have been further assessed using the criteria listed in the site methodology (part 2, appendix 1). This includes criteria on elements such as: biodiversity, flooding, pollution, Green Wedge designation and road network impacts, neighbouring use impacts and whether this is greenfield land.

4.4. The approach to assessment of sites was to assign a Red, Amber, Green (RAG) rating to each of the criteria to help demonstrate the important issues on the site. Assessment of ownership status and capacities were also provided at this stage.

4.5. Initial assessment, including RAG ratings and basic site data, was carried out by policy planning officers using mapping constraints on the sites and applying judgment on how much impact the constraint has on the site.

### **Internal and External Stakeholder Consultations**

4.6. To provide a more comprehensive assessment, further comments were sought from internal specialists (e.g. Nature Conservation officers, Lead Local Flood Authority, Highways officers, Heritage officers, City Archaeologist etc). Specialists used the same site assessment methodology to apply a RAG rating and narrative behind this RAG rating. These have been considered within the overall RAG rating for the sites and amended as necessary.

4.7. As part of the Local Plan preparation process, statutory consultees were invited to make comments on the Local Plan including site allocations at each

consultation stage. Duty to cooperate meetings have been held with statutory consultees at each stage where objections were raised. Since the close of the Regulation 19 consultation, these duty to cooperate meetings were held to discuss any concerns they raised about the soundness of the Local Plan and site allocations in their representations. Notwithstanding these duty to cooperate meetings, holding objections from Sport England remain on some site allocations. These site allocations, the grounds for objections, and the Council's responses will be explored over the course of the examination.

### **Evidence base**

4.8. A range of evidence-based documents have been produced to support the Local Plan. All of the below have been taken into account and refreshed when assessing the sites at each stage of consultation.

### **Sustainability Appraisal (2020 and updated in 2022)**

4.9. In line with NPPF paragraph 32, a Sustainability Appraisal (this is included within the submission documents) has been commissioned to provide an assessment of suitable alternative sites as well as appraisals of policies within the plan.

4.10. The Council have commissioned sustainability consultants Levett-Therivel to complete a Sustainability Appraisal which provides an independent analysis of the shortlisted sites (433 sites) from the suitable and achievable SHELAA sites.

4.11. The findings of this study reflected any key sustainability impacts and objectives that could be adversely impacted for each of the sites (e.g. public health, strategic needs, environmental impacts).

4.12. The SA provided an independent RAG rating against sustainability objectives and standard assessment criteria to arrive at suggested mitigations and site allocations. This SA assessment accounted for points raised through internal and external consultations.

4.13. All comments made within the SA have been applied to the site assessment process to provide mitigations. Following each consultation, feedback was given to Levett-Therivel for review and to provide further advice.

4.14. The Sustainability Appraisal is an advisory document and has largely been followed in assessment of the sites. However, the Council has tried to balance some comments against the larger Strategic need and suggested mitigations through allocations.

### **Strategic Flood Risk Assessment (2020 and updated in 2022)**

4.15. A Strategic Flood Risk Assessment (SFRA) is a key evidence base document to support the Local Plan which maps flooding data to indicate key areas of flood risk.

4.16. Leicester City Council's SFRA was carried out by Riverscape Environmental Consultants Ltd, which applied sequential and Exception testing to flood risk data. This process provided a summary of each site's potential flood risk and development potential.

4.17. Due to the indications of flood risk presented, this data helped to inform flooding RAG ratings and has helped informed potential development capacities (for example necessary reductions of site sizes to take into consideration any flooding constraints).

### **Green Wedge Study (2017) and Addendum (2020)**

4.18. Leicester has a number of Green Wedge designations across the city. A study was completed by the Council to assess the qualitative and quantitative impacts of Green Wedge on site assessments and mitigations.

4.19. The justification behind the mitigations is further detailed in a separate Green Wedge topic paper in support of the submission.

### **Infrastructure Study (2020 and updated in 2022)**

4.20. An infrastructure study helps to establish the main infrastructure needed to ensure that the Local Plan and any development provide sufficient delivery.

4.21. A study has been undertaken by independent infrastructure consultants 'Civix' to assess the necessary infrastructure to serve the city, which takes into account site allocations.

4.22. A RAG score has not been included within the assessment, but the Infrastructure study should be read alongside this paper.

4.23. Further assessment was also carried out by Planning officers on accessibility of services through a GIS based approach.

### **Open space, Sport and Recreation Study (2017)**

4.24. This study was carried out by Planning Officers at Leicester City Council alongside colleagues in the Parks department to provide information on the overall quality and quantity of open space in the city. This study finds that all sites within the city are within 800 metres walking distance of open space.

### **Deliverability & Viability**

4.25. It should be evident that the shortlisted sites identified are deliverable/developable within the timeframe of the Local Plan i.e. 2020-2036. This is with the aim to prevent housing and employment supply issues and meet the strategic needs of the city.

4.26. An initial analysis was carried out by the Council applying basic details of deliverability for each site (i.e. private or public, extant planning permissions considered to be deliverable, availability timeframe etc).

4.27. To gain additional deliverability and viability information, the Council has sought deliverability data from site landowners and site promoters through a deliverability questionnaire (appendix 2). This questionnaire outlined questions pertinent to the property industry (e.g. build out rates, infrastructure costs etc) as well as estimated capacities and desire from landowners for development. This was carried out with both internal colleagues (where the council is landowner) and external landowners. Amendments to capacities, development timeframes, build out rates and other factors were identified as part of this process, and these have been applied to site updates as appropriate.

4.28. Landowners were given a deadline for response. Where no responses were received to the deliverability questionnaire, the Council has applied an assumption of availability and deliverability to the sites. These assumptions were based on the overall council judgement of when the site could come forward for development, dependent on the size of the site, known constraints and past delivery rates.

4.29. It is important to note that the Council are a significant landowner in the City and have a long track record of facilitating development and intervening in the market. Recent examples include:

### **Hamilton Urban Extension**

4.30. Hamilton is a major allocation in which was allocated in previous local plans. The council worked with private landowners to deliver around 3000 Dwellings as well as securing significant developer contributions to provide local infrastructure including open space and education provision.

### **Ashton Green**

4.31. As the main landowner at Ashton Green, Leicester City Council has worked with bodies including the government to secure funding to deliver critical infrastructure including a major access road to facilitate delivery of the scheme. Multiple phases have either been completed on site and the council is working with developers regarding the later phases. So far around 160 houses have been delivered.

### **Leicester Waterside**

4.32. Within the Central Development Area one of the key areas for delivery of residential development is the Waterside. A supplementary planning document was adopted in 2015 provided an overall framework for delivery. A range of dwellings have been built ranging from 1 & 2 bed apartments and also large family houses. Using compulsory purchase powers, the council was able to assemble a complex area from multiple landowners, and working with a single developer and various government agencies managed to deliver much needed family housing within the CDA.

4.33. Further to the Council assumptions based on past delivery rates, a developer panel was also held with key developers across Leicester to provide an understanding of current trends in delivery based on constraints within the development industry e.g. land values, building material supply etc. Any feedback from this event was added into the assessment and updated for potential timescales of delivery.

4.34. The site assessment methodology and NPPG also require that viability of sites should be considered before arriving at site allocation decisions. As discussed above, where possible, some viability information has been sourced

through the deliverability questionnaire on allocated sites. To develop this further, the Council has conducted a full plan viability study which covers a selection of relevant site typologies across the city.



## 5. Final Site allocations

5.1. In view of the above RAG ratings, evidence and comments from both internal and external stakeholders the Council have arrived at a selection of suitable site allocations. A breakdown of how many sites were presented for each consultation stage of the Plan making process has been outlined in appendix 3 of this topic paper.

5.2. In total, the Submission Local Plan identifies 58 site allocations, consisting of 5 strategic sites and 53 non-strategic sites, all of which have been shown on the Policies map. A mixture of uses have been allocated including housing, employment, education, tourism and office uses.

5.3. The Council recognises the imperative to develop brownfield over greenfield land. Sites have been allocated at Evington Valley Road (site 222), Mary Gee Houses (site 307) for housing development to name a few. Due to the strategic need and to identify a suitable number of sites that could come forward as quickly as possible, this constraint and the number of other greenfield sites has been balanced proportionately against all other constraints to identify sites.

5.4. The following strategic sites have combined SHELAA sites to make a larger strategic site:

- Land to the east of Ashton Green – sites 262 & 579
- Land to the west of Anstey Lane – sites 309, 718 and 1054

5.5. Site 1054 was added into the Anstey Lane Strategic site prior to Regulation 19 consultation in relation to new landowner availability and assessed suitability.

5.6. Some sites have been suggested for partial allocation or a mixed use allocation to balance meeting housing needs against mitigations needed to develop the site. This includes factors such as open space deficiency in certain areas, established businesses nearby, some SA suggestions and flooding constraints. The site allocations documents provide further information on these mitigations.

## Mapping

5.7. A policies map had been produced for the Local Plan which indicates areas allocated for certain uses i.e. retail centres, housing proposals, employment proposals etc. This is in accordance with paragraph 23 of the NPPF requires that “Broad locations for development should be indicated on a key diagram, and land use designations and allocations identified on a policies map”.

5.8. Geographical locations of each site have been shown within the Policies Map and site allocations documents. Site boundaries have been shown on the policies map using the SHELAA site boundaries that were received during site identification stage. Subdivisions have not been made to allow planning applications to determine the location of development taking account of constraints. However, where there is a strong indication of a geographical/legal constraint on a site, this has been marked as a safeguarded area on the map/ supporting documents (e.g. flooding issues, site 335 – part of playing field, transport routes).

5.9. The Council has engaged with landowners to check site boundaries are correct throughout the assessment process. Some issues have been raised as part of the Regulation 19 consultation for some of the site’s boundaries. The Council does not believe that amendments to site boundaries will have an adverse impact on housing supply to warrant a strategy change and should be considered as part of the examination.

## Ongoing Deliverability and Viability Work

5.10. The Council has worked with, and will continue to work with, landowners and site promoters to gain information to support allocations and justify the mitigations suggested. The Council expects that most deliverability information will be submitted as planning applications come forward on both Council and private owned sites. However, some landowner engagement has taken place to gain an insight into deliverability information.

5.11. Landowners and site promoters on all strategic sites have been requested to submit information to help justify the allocation of the site due to the quantum of development. This includes key studies that address the key constraints on the sites. This is an evolving process, ongoing work with site

promoters will continue, and any information submitted to justify this will be taken into consideration.

5.12. On all council owned non-strategic sites, housing and development colleagues have been kept up to date on Local Plan updates and allocated sites. This is with the aim to continue to build up relevant evidence to justify the deliverability of site allocations, particularly for affordable housing requirements. This has been demonstrated by sites such as site 963 – Southfield Infant School and site 190 – Lanesborough Road Allotments which have both received planning approval.

5.13. A number of sites were received and assessed as suitable for housing based on their low grading in the Economic Development Needs Assessment (EDNA). These sites are largely privately owned and in mixed ownership. Some landowner engagement was conducted during the EDNA process, however, further engagement will continue with these landowners due to the complex nature of these sites not being promoted by one developer.

### **Main changes to site allocations in between Reg 18 and Reg 19 consultations**

5.14. A number of changes have been made to the sites in between Draft Plan consultation and Submission Plan consultation. However, the same methodology was followed for site assessment. Noted below are the pertinent changes in between these two stages:

<b>Change made</b>	<b>Reason for change</b>
Site capacities	In response to higher densities issue raised in Regulation 18 consultation representations (from 30 to 35dph on most sites) and planning application approvals/refusals.
Site assessment RAG ratings	Refreshed to take account of up to date internal and external consultee comments – both received during consultation and after.
Inclusion of two Gypsy & Traveller Transit sites on allocated sites	Assessed need for transit provision in GTAA addendum (2019). Please see separate Gypsy & Traveller topic paper for further information.

<b>Change made</b>	<b>Reason for change</b>
Inclusion of Household Waste Recycling Centre on strategic site	In response to latest evidence and evaluated need
Site evidence base	Updates to various different evidence base to take account of latest data and planning guidance. Reapplying studies to site assessment.
New sites added	New sites submitted for consideration. These sites were analysed in full and one site deemed suitable and available (portion in Land west of Anstey Lane allocation)
Sites removed	New ownership status, completed planning permissions and sites now deemed unsuitable following further assessment
Ownership statuses	Based on landowner engagement and desired removal from the plan
Minor policy changes	Wording changes to account for latest guidance and consultation feedback. Inclusion of one strategic site (Site 464/ Policy SL06 – Beaumont Park) and removal of (Site 1044 – General Hospital – based on availability at time of submission)

## **6. Duty to Cooperate and Stakeholder Engagement**

6.1. Cross boundary cooperation is vital to the development of Leicester due to the unmet need that has been distributed to the surrounding districts and the development of strategic sites that border the different districts.

6.2. Leicestershire County Council colleagues have helped to identify capacities for infrastructure across the county to establish needs for factors such as education provision, highway capacity and health provision outside of the Leicester administrative boundaries.

6.3. Councils within the Leicestershire HMA have been consulted at each stage of consultation and regular Duty to Cooperate meetings have been held to address overall strategic needs cross boundary. Comments received have been fed into the site assessments where necessary and helped to justify/inform site allocations.

### **Statements of Common Ground**

6.4. Agreed matters raised in Duty to Cooperate meetings and associated representations, have been compiled into a number of draft Statements of Common Ground on several strategic sites within Leicester. The Statements of Common Ground specifically related to the sites that have been established are outlined below:

- Land West of Anstey Lane (with Charnwood Borough Council and Blaby District Council) – also examined at Charnwood Local Plan Examination in Feb 2023
- Land to the north of A46 (with Charnwood Borough Council)
- Land to the east of Ashton Green (Charnwood Borough Council)

6.5. Updates to the SOCG's may be necessary as circumstances significantly change on a particular site. Any updates will be provided during the examination as necessary. This is not an extensive list of SOCG's and other SOCG's are being considered in response to other parts of the plan.

## 7. Summary

7.1. After careful consideration of all the sites submitted as part of the Local Plan and SHELAA assessment process, the final site allocations have been submitted with the plan.

7.2. The Council will commit to continue working closely with key stakeholders to ensure that sites will be delivered within the Plan Period.

7.3. Alongside the site policies contained within the Submission Local Plan, the council has also produced and published the following documents to support these site allocations:

- Strategic site allocation document (2022)
- Non-strategic site allocation document (2022)
- Site allocations map (2023)
- Policies map (2023)
- Site assessment spreadsheet (2022)
- Regulation 18 statement of representation responses (2022)
- SA/SEA (2022)
- Site assessments methodology (2020)
- SHELAA including site methodology (2022)
- Viability Study refresh (2022)

## **Appendix 1: Charnwood's Local Plan Examination November 2022 Inspectors' Report**

EXAM 55 - Inspectors' Letter Unmet Need Post Hearing Session November 2022.pdf ([charnwood.gov.uk](http://charnwood.gov.uk))

## Appendix 2: Deliverability questionnaire template

1. What are some of the key constraints on the site that may prevent this from coming forward?			
2. Will a development scheme need to factor any of the fixed constraints into the design before the site can be brought forward?			
3. Will any mitigation measures (on site and offsite) need to be provided to bring the site forward?			
4. Is there any infrastructure required that would impact on delivery? (Please include any associated timescales or specific requirements that could impact on this delivery)			
5. Please tick the most appropriate box for when you expect that the land will come forward and the site be delivered?	Within the next 5 years	Between 6 and 10 years	Beyond 10 years
6. Does the site have planning permission? If so, what type of planning permission does the site have?	Full (or outline with reserved matters)	Outline	No permission
7. If only outline planning permission is granted, when is it intended to submit reserved matters application?			
8. When is it intended that a planning application will be submitted, if this has not already had planning permission granted?			
9. How long has been allowed for site preparation works?			
10. When is it expected that the first dwelling and/or economic unit on site will be completed?			
11. What is the planned phasing of delivery?			
12. Do you foresee any events that might alter the deliverability of the site (such as other sites being prioritised elsewhere)?			
13. Please indicate the timescale you would anticipate the affordable housing element will be delivered in the scheme (if this incorporates any housing on site).			
14. Please specify the type and tenure of housing/economic development envisaged on site			



### Appendix 3: Stages of Plan consultations

In accordance with consultation guidance pertaining to local plans, the submission Local Plan follows 4 previous rounds of consultation which provided opportunity for comments on potential sites:

Consultation number	Name of consultation	Year of consultation	Description of site consultation undertaken
1	Issues & options	2014	Invited comments on broad locations for housing and economic developments within Leicester. This consultation did not present sites but builds on previous Local Plan areas of development.
2	Emerging Options	2017	270 potential sites were presented for land use allocations in the 'Potential Development sites document'. These sites were assessed by officers to be suitable for development. The consultation invited comments on these sites.
3	Regulation 18	2020	418 suitable sites were analysed at this stage. A shortlist of 80 sites were deemed suitable for site allocation and put forward for further consultation in the Draft Local Plan (Regulation 18 version). This consultation identified strategic (6) and non-strategic sites (74) for potential land use allocations, including residential, employment, education, and office allocations.
4	Regulation 19	2023	433 sites were assessed (The above sites were reassessed, and 15 additional sites were assessed). A total of 58 sites were presented for comment during the Regulation 19 consultation, which was the final consultation before submission. This included 5 strategic sites and 53 non-strategic sites.





