



CABINET – 20 NOVEMBER 2020

DRAFT CITY OF LEICESTER LOCAL PLAN 2020 TO 2036

REPORT OF THE CHIEF EXECUTIVE

PART A

Purpose of the Report

1. The purpose of this report is to advise the Cabinet on the content of the draft City of Leicester Local Plan 2020 to 2036 and to set out a suggested response to the draft Local Plan to be submitted to Leicester City Council (the City Council) as the views of the County Council.
2. The key comments are set out in this report and the detailed comments are set out in the appendix to this report.

Recommendations

3. It is recommended that:
 - (a) The content of the draft City of Leicester Local Plan 2020 to 2036 be noted;
 - (b) The County Council's response to the draft City of Leicester Local Plan consultation, set out in paragraphs 39 to 45 inclusive and the appendix to this report, be approved.

Reasons for Recommendation

4. The draft City of Leicester Local Plan includes policies and proposals for the future development of Leicester to 2036. Given the location of Leicester within the centre of Leicestershire and the functional connectivity with communities living and working in the County, the content of the emerging Local Plan is particularly important.
5. The proposed response sets out key comments and identifies areas where it is considered that amendments are required.

Timetable for Decisions (including Scrutiny)

6. The draft response to the draft City of Leicester Local Plan was considered by the Scrutiny Commission on 4 November 2020 and its comments are set out in Part B and Appendix B of this report.
7. Consultation responses are required to be submitted to Leicester City Council by 7 December 2020.

Policy Framework and Previous Decisions

8. The Government's Planning White Paper, considered by the Cabinet on 18 September 2020, proposes 'end to end' reform of the current planning system in England. Local Plans are proposed for retention but with a greater role and tighter timeframe. Once the consultation responses have been considered by Government legislative change and revision to national planning policy will take place and will impact on plan making processes.
9. The Strategic Plan (2018 to 2022) "Working together for the benefit of everyone" was approved by the County Council in July 2020 (having been revised in light of the Council's declaration on climate change). It has five strategic outcomes, with the delivery of 'Affordable and Quality Homes' and 'Strong Economy' most directly impacted by the draft City of Leicester Local Plan.
10. The Strategic Growth Plan (SGP) for Leicester and Leicestershire, approved by the County Council in November 2018 (and by the other nine partners in late 2018), provides the long-term vision for future planned growth to 2050. It recognises the pivotal role of the city of Leicester in the area and looks for it to develop its role as the 'central city' supporting the market towns and rural area around it through more jobs, leisure, arts, culture and entertainment. The SGP recognises that Leicester needs to grow in such a way that full use can be made of its existing services and infrastructure and notes that by providing more homes close to jobs in the city centre and other employment centres this will relieve development pressures in other parts of the surrounding authorities.
11. The Housing and Economic Development Needs Assessment (HEDNA, 2017), informed the SGP and set out a housing need figure for the City of 1,668 dwellings (dws) per annum (from 2011 to 2036). The existing Standard Method introduced by Government in 2018 is used by the City Council in the draft City of Leicester Local Plan. This provides a housing provision figure of 1,712 dws per annum.
12. A Government consultation on 'Changes to the current planning system' ended on 1 October 2020. In its response, the County Council raised strong concerns to proposed changes to the Standard Method which would result in significant increases in proposed housing provision for all districts other than Melton.

13. A strategic transport priorities document for Leicester and Leicestershire is being developed alongside the SGP to ensure the long-term development needs and associated transportation requirements are coordinated. A report on this is also being considered by the Cabinet at this meeting.
14. Leicester City Council previously consulted on emerging issues and options at an earlier stage of its local plan making in 2017. An officer response was made at this time.

Resource Implications

15. The Director of Corporate Resources has been consulted and the following comments made.
16. The proposals of the draft Local Plan will have an impact on the County Council's finances.
17. Given the connectivity of infrastructure in the City and County which includes transport, education, adult social care etc, it is of paramount importance that close working is undertaken between the two Authorities (and other partners) in the delivery of infrastructure and related proposals. Formalising partnership arrangements to minimise risk for all partners involved will be helpful.
18. The Government's ambitions in the Planning White Paper (August 2020) will also need to be factored into the delivery of this Local Plan, necessitating adjustment and perhaps major changes to the mechanisms used to secure and deliver infrastructure.
19. Meeting the City Council's unmet need will increase the pressure on County Council infrastructure. This is likely to be further exacerbated if the proposed changes to the Standard Method of calculating housing need (which the County Council opposes) are introduced, leading to further increases across all but one of the County's districts.
20. Therefore, it is crucial that there is flexibility wherever possible around timing of spend and what money is spent on. Flexibility is important as some schemes will need to subsidise the cost of others. Early identification of cross-boundary issues with regard to infrastructure funding will be essential and the draft Local Plan will enable this to happen, as well as ensuring developer contributions to local infrastructure costs can be secured in a coordinated and equitable manner.
21. All this strengthens further the need for formalised partnerships which are likely to place all partners in the best position to minimise the risks linked to handling and addressing the major changes to the English planning system.

Circulation under the Local Issues Alert Procedure

22. This report will be circulated to all members.

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PART B

Background

23. The City of Leicester Local Plan 2020 to 2036 is a draft Local Plan for consultation (hereafter called the draft Local Plan).
24. Consultation on this draft Local Plan forms a “Regulation 18” consultation, which means that once the City Council has considered comments received during the consultation period the draft Local Plan will be refined and there will be further consultation held on the Submission Plan (Regulation 19). A date has not yet been set but this is likely to be in late 2021/early 2022.
25. Leicester City Council intended to start consultation on 23 March 2020 but this was postponed due to the onset of COVID-19 and the resulting local lockdown restriction. Consultation then started on 14 September 2020, alongside the release of evidence prepared to inform the draft Local Plan. Consultation closes on 7 December 2020.

Overview of content of Draft Local Plan

26. The City Council has subjected the draft Local Plan to a Strategic Environmental Assessment (SEA) to assess its environmental impacts and a Sustainability Appraisal (SA) to assess environmental, economic and social effects. A Habitats Regulations Assessment (HRA) is being prepared.
27. A key aspect of the draft Local Plan is to identify the amount of new jobs and homes needed and translate these into the provision of sufficient land.
28. In brief, the draft City of Leicester Local Plan includes:
 - 1,712 dws per annum (29,104 dws over plan period to 2036)
 - Almost 5,000 dws of which are to be located in the Central Development Area (CDA), within which nine distinctive character areas are identified with a specific vision for each.
 - 9,827 dws which will be met through existing commitments (extant outline and full planning permissions as at 31 March 2019).
 - 2,594 dws which will be met through five strategic allocations, all to include 30% affordable housing and self-build/custom build plots:
 - i. **Western Park Golf Course:** 52.1 hectares, 466 dws, seven permanent gypsy and traveller pitches, 20.5 hectares of employment land. Also City Council owned land in Blaby District submitted through Blaby District Council’s ‘Call for sites’.
 - ii. **East of Ashton Green:** 53 hectares, 660 dws, new secondary school (1,200 pupils), includes small employment site.

- iii. **North of A46 Bypass:** 33 hectares, 611 dws.
 - iv. **Land west of Anstey Lane:** 17 hectares, 325 dws.
 - v. **General Hospital site:** 28 hectares, 532 dws.
- 1,486 dws of which will be small allocations outside the CDA.
 - 2,550 dws of which will be windfall and small sites.
 - Quantified unmet housing need of 7,742 dws to be redistributed through agreement with Leicestershire district councils and the County Council.
29. Housing provision in the early years of the draft Local Plan will largely rely on existing housing sites being delivered including those with current planning permissions and allocations. Development of the strategic sites will be towards the later years, mainly due to the infrastructure needed to support new housing.
30. To bring new jobs and investment to the City the draft Local Plan looks to:
- continue the delivery of offices in the city centre, with two proposed office allocations around the railway station and at Southampton Street;
 - Pioneer Park for science, research and innovation;
 - the Cultural Quarter for business start-ups and creative industries;
 - new manufacturing, high quality new employment areas at the former Western Park Golf Course, Beaumont Park, and land east of Ashton Green; and
 - retention of 'fit for purpose' textiles areas and neighbourhood employment areas.
31. Infrastructure, retail and leisure growth and the strategic green network are also considered essential components for the strategy to deliver planned growth for Leicester.
32. The draft Local Plan is supported by a wide range of evidence which has informed its formulation.

Duty to Co-operate

33. Leicester City Council has engaged constructively, actively and on an ongoing basis with the County Council, other neighbouring authorities, the LLEP (Leicester and Leicestershire Enterprise Partnership) and other bodies. The collaborative work on the SGP also exemplifies this.
34. All ten partners signed up to a Joint Position Statement relating to Leicester's Housing and Employment Land Needs which was published on 14 September 2020. This sets out how authorities will continue to work together to accommodate a potential unmet need for housing and employment land identified in the draft Local Plan.

35. To ensure that the Leicester and Leicestershire Housing Market Area (HMA) housing and employment need is fulfilled up to 2036 a Statement of Common Ground is being produced, to be submitted to each local authority within Leicester and Leicestershire for agreement. It is expected this will be completed in 2021.

Comments of the Scrutiny Commission

36. At its meeting on 4 November the Scrutiny Commission considered a report which summarised the content of the draft Local Plan and set out the response being recommended to the Cabinet. The Commission also received a comprehensive presentation from the Head of Planning at the City Council on the draft Plan and was able to ask him questions. A note of discussion is attached as Appendix B.
37. Key issues discussed included:
- The redistribution of housing, including the scale of the City unmet need figure and whether the City Council had maximised the use of land within its boundaries.
 - University accommodation in the City, including whether there had been overdevelopment of this type of housing at the expense of other homes, and whether Covid-19 would have a significant impact on future provision.
 - The distribution of employment land and whether it was appropriate for the draft Local Plan to focus on employment and office land provision in the City which might accommodate well-paid jobs with the County being expected to provide additional housing and land for warehousing (which usually generate lower paid employment).
 - Transport policy, connections and infrastructure across Leicester and the County, including parking policies, park and ride, congestion levels and air pollution. The likelihood of the A46 Expressway proposal proceeding was also discussed.
 - The likely impact of the Government's Planning for the Future' White Paper on the draft Plan, particularly in relation to infrastructure funding.
 - The desirability of holding further such sessions on future stages of the Leicester Local Plan.
38. In respect of the Council's draft response, officers were asked to specifically consider making some detailed changes and these have been incorporated into the response at Appendix A.

Analysis - Corporate Perspective

39. The City of Leicester lies in the centre of the County and forms the main cultural, tourism, leisure, employment and retail hub for Leicestershire, and for many local communities it also forms the place where they live or work.
40. Other cities in close proximity such as Nottingham and Derby provide a similar role, yet none provide the unique identity, sense of place and pride regarding strength, diversity and sporting prowess as the 'Central City', Leicester.

41. Cities by their nature are dynamic, ever changing. In recent months some of this change is likely to have been accelerated by the COVID-19 pandemic, in particular an acceleration in online retail and related implications - such as a fall in demand for retail floorspace, more demand for floorspace for fulfilment centres, and differing logistics requirements etc. Other change includes an increase in remote working, use of local centres, walking, cycling and use and appreciation of local green spaces. Although it may be considered untimely in this period of uncertainty to plan for the next 15 years it is wise to do so to provide a robust framework and clear direction of travel which provides sufficient flexibility to deal well with uncertainty and accelerated changes.
42. Most homes and businesses in Oadby and Wigston, and many homes and businesses in Blaby, Charnwood, Harborough and, to a lesser extent, in Hinckley and Bosworth are located within the Leicester Urban Area as defined by the Office for National Statistics. This emphasises the importance of ensuring that for these communities, as well as those who live in the Leicestershire market towns and more rural settlements, the policies and proposals of the emerging draft Local Plan seek to protect, enhance and create attractive and desirable places to live and work. This is in addition to the need for the city centre to function well and effectively in the 21st century. Often this will relate to the function of more local urban centres, the quality of the local built and natural environment, and the ability to access - by sustainable modes of transport - open spaces and other nearby communities as well as the city centre.
43. It is noted that the quantified unmet need for housing for the City means that all five strategic sites, CDA sites, general sites and windfalls are all required to come forward in the Plan period to lessen the unmet need that will ultimately need to be redistributed among Leicestershire districts. The need for Leicester to maximise delivery is in the interests of all authorities in the Leicester and Leicestershire HMA and reflects the long term spatial growth steer set out in the SGP.
44. On the whole it is considered that the draft Local Plan is clear, comprehensive and well balanced in its proposals for future planned development. However, there are areas for improvement, clarification and where assurances need to be given. The key comments are listed below with the full detailed comments included in the appendix.
45. Key comments include:
 - a) Whilst recognising that options for Leicester to meet its own needs are significantly constrained, the County Council will expect the final Local Plan to provide a robust policy basis for dealing with the cumulative and cross-boundary impacts of growth, including where this affects Leicestershire's transport system and other infrastructure it provides.
 - b) Support for a strong vision for the CDA and support the achievement of strong delivery of housing within the CDA, many sites for which are brownfield.

- c) Support the achievement of strong delivery of housing elsewhere in the City, and look to continued and closer working with the City Council and other partners, including on masterplans and the delivery of the five strategic sites, in particular, the Western Park Golf Course which includes City-owned land within Blaby District, to the East of Ashton Green which includes a new secondary school, and in respect of the General Hospital site which includes allowing for potential contributions to the South East Leicester Transport Strategy Area (SELTSA).
- d) Suggest the inclusion of a further objective regarding the role of the City in the wider Leicester and Leicestershire HMA, maintaining and enhancing connectivity for County residents to services and facilities, such as to the main hospitals (Glenfield Hospital and Leicester Royal Infirmary).
- e) Commitment to working with the City Council to understand the impact of growth for Leicester across the HMA, including its transport system, the infrastructure and measures required to enable and mitigate the impacts of that growth, to ensure there is a robust policy framework in place to underpin development, funding and delivery of such infrastructure/measures, especially where that might be necessary to deal with cumulative and/or cross-boundary impacts.
- f) Ensure the 'Strategy for Leicester' explicitly refers to continued joint working with the County Council, builds on the collaborative approach the City Council is taking to transport evidence development, and includes policies that provide for cross-boundary assessment and funding of transport measures required to enable and support growth.
- g) Concern that some of the housing provision outlined may not be deliverable within the Plan period, and the current unmet need figure of 7,742 dwellings needs to be regarded as a minimum, and provision made within the draft Local Plan to take account of the potential for any further shortfall.
- h) Green infrastructure: support a proactive approach to provision of further green space, such as designation of further parks so communities can have access to open space, the valuable function they fulfil as cool havens in heatwaves, and note potential loss of existing green assets, which includes release of land from the green wedge.
- i) A map showing ecological permeability and physical connectivity could be incorporated into the evidence base to ensure that developers understand the impacts on wider strategic activity. The proposed changes to land use encouraged by the Environment Bill will need to be considered for urban fringe and wider rural-urban links.
- j) Suggest a greater profile for the River Soar and Grand Union Canal waterway corridor. This forms a very striking asset, extending into Leicestershire to the south and north of the City, with value from environmental, recreational, leisure, tourism and regeneration perspectives.
- k) There is potential to combine action for biodiversity with the provision of increased access to natural greenspace for both urban and rural communities through joint working between the County and City Council. Suggested provision of large-scale accessible natural greenspace serving the south and east of the city could be investigated further. Considered there are opportunities within the Leicester Urban Area to provide for this

and follow the River Soar corridor. Scope for net gain and the opportunities for cross-boundary working to identify and bring forward suitable sites.

- l) Recognising change will have been accelerated by the current COVID-19 pandemic, such as acceleration in online retail, and related implications such as an increase in demand for floorspace for fulfilment centres, differing logistics requirements, use of buildings across the City, increase in remote working, use of local economic centres and walking and cycling etc.
- m) The sections concerning climate change and air quality refer to the need to reduce emissions from transport and new development but does not include energy and heat infrastructure for existing housing which needs to be addressed to reach net zero.
- n) Recognise need to boost the City's economy but consider it may be appropriate to direct some of proposed employment land to the districts to 'free up' more land in Leicester for housing development.
- o) Value of good schools to support sustainable communities needs to be recognised in the draft Local Plan and promoting strong progression routes to further and higher education and employment. The County Council supports the development of the proposed secondary school within the planned East of Ashton Green strategic site allocation, recognising that the development of this school will help mitigate the accommodation issues arising from City pupils attending County schools.
- p) Would like to see inclusion of reference required on environmental aspects of design, relating to the use and sourcing of sustainable materials etc and associated cost implications.
- q) Reference to rail is too narrow, needs to be broadened to encompass how people travel to Leicester by rail, direct rail services to Coventry, enhanced services to Birmingham, and provision of an HS2 classic rail compatible link at Toton, opening up direct access to Leeds.

Equality and Human Rights Implications

- 46. There are no equality or human rights implications arising from the recommendation in this report. The draft City of Leicester Local Plan seeks to provide a sustainable strategy for the future of the City, setting out how it proposes to protect environmental assets and provide new homes and jobs for the City. In quantifying the likely scale of the unmet need unable to be accommodated in the City, the City Council is seeking to work with other partners elsewhere in the Leicester and Leicestershire HMA to provide for the homes and jobs required.

Environmental Implications

- 47. The County Council will continue to work closely with Leicester City Council and other partners to minimise the impact planned growth has on the environmental assets of Leicester and Leicestershire.
- 48. The impact upon the environment is a key consideration in all planning decisions made within the context of an approved or emerging Local Plan, and

the County Council will seek to ensure that opportunities are taken to enhance the environment through biodiversity net gain and sustainable forms of development.

Partnership Working and Associated Issues

49. The County Council works closely with the Leicester and Leicestershire Strategic Planning Partnership, which the City Council, the County Council, the seven district councils in Leicestershire and the Leicester and Leicestershire Enterprise Partnership. Mr Pendleton CC represents the Council on, and chairs, the Member Advisory Group which oversees this work.

Background Papers

Leicester City Council 'City of Leicester Local Plan 2020 to 2036' Draft Plan for Consultation March 2020.

https://consultations.leicester.gov.uk/sec/draft-local-plan/user_uploads/draft-local-plan-final.pdf

Various evidence documents informing the above draft Local Plan.

<https://consultations.leicester.gov.uk/sec/draft-local-plan/>

Appendices

Appendix A - Draft Response from Leicestershire County Council to draft City of Leicester Local Plan 2020 to 2036

Appendix B - Scrutiny Commission draft minute

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