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**Hinckley & Bosworth  
 Borough Council**

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### **Consultation on the Draft Leicester City Local Plan 2020–2036 (March 2020)**

Thank you for consulting Hinckley and Bosworth Borough Council on the Draft Leicester City Local Plan 2020–2036. We look forward to continuing positive and productive dialogue between our two authorities and the wider Housing Market Area (HMA) authorities and other partners to help progress our local plans and the wider strategy for Leicester and Leicestershire.

It is understood that this consultation is being held under regulation 18 meaning the plan will be revised following comments received during this consultation, before being published for further public consultation in line with regulation 19, prior to submission for public examination. It is appreciated that the plan was drafted prior to March 2020 and consultation was due to start earlier in the year, but delayed due to Covid-19 restrictions.

Hinckley and Bosworth Borough Council have the following comments to make on key aspects of the draft plan:

#### **Duty to Co-operate**

It is recognised that Leicester City Council has engaged constructively, actively and on an ongoing basis with partners including neighbouring authorities, the County Council, the LLEP (Leicester and Leicestershire Enterprise Partnership) and other relevant bodies. The Strategic Growth Plan is testament to the joint commitment across Leicester and Leicestershire to plan for long term growth through an agreed, proactive and collaborative approach.

All ten partners are signatories to a Joint Position Statement relating to Leicester's housing and employment land needs published in 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 Leicester Local Plan.

We support the approach that the most effective method to address strategic cross boundary housing and employment issues is through a Leicester and Leicestershire Housing Market Area Statement of Common Ground, which is to be submitted to each local authority within Leicester and Leicestershire for agreement. It is expected this will be completed in early 2021.

#### **Plan Strategy – Housing and employment land needs**

Chapter 4 of the plan establishes the overall development strategy for the City. It sets out the City has a housing need of 1,712 dwellings per year, or 29,104 dwellings over the lifetime of the plan 2020-2036. The figure is derived from the standard method for calculating local housing need and this approach is supported as a sound basis to work from, in line with national policy and guidance.

The recent government consultation on Changes to the Current Planning System could lead to significant changes to the way in which housing need across England is calculated. The proposed method set out in the consultation would give the city a housing need of around 1,119 dwellings per year. However it is noted that this remains a consultation and yet to be incorporated into revised national policy/guidance. It is likely that further changes will be made to the methodology prior to coming into force and it is sensible at this time to plan on the basis of the current method. Whilst there is no set timescale for a new standard method to be introduced it is expected in the short term. Dependent on any further changes to the proposed method there may well be implications on the scale of unmet need in the city.

The plan proposes that the identified need of 29,104 dwellings will be met through 9,827 dwellings which already have planning permission, 2,550 on future windfall sites, 4,905 within the Central Development Area (CDA), 1,486 on non-strategic (small sites) allocations outside the CDA and 2,594 dwellings at five strategic allocations. These strategic sites are:

- Western Park Golf Course: 52.1 hectares, 466 dwellings, seven permanent gypsy and traveller pitches, 20.5 hectares of employment land.
- East of Ashton Green: 53 hectares, 660 dwellings, new secondary school (1,200 pupils), small employment site.
- North of A46 Bypass: 33 hectares, 611 dwellings.
- Land west of Anstey Lane: 17 hectares, 325 dwellings.
- General Hospital site: 28 hectares, 532 dwellings.

In total the plan identifies a current and future supply of 21,362 dwellings up to 2036. The plan proposes the remaining 7,742 dwellings not accounted for in the above to be redistributed elsewhere in the HMA through agreement with the Leicestershire district councils and the County Council.

In terms of employment land the local plan proposes to allocate around 44ha of employment land. The draft local plan notes that evidence on employment need is in the process of being updated. This work has now been completed and the evidence, set out in the Economic Development Needs Assessment (2020) (and in the September 2020 Joint Position Statement) indicates a shortfall of 23 hectares of employment land in the city. This new evidence should be incorporated into the revised draft plan.

So overall the plan sets out an unmet need of 7,742 dwellings and 23ha of employment land to be accommodated elsewhere within the Leicester and Leicestershire Housing Market Area/Functional Economic Market Area.

The National Planning Policy Framework (NPPF) (paras 11 and 60 in particular) is clear that when developing local plans and policies authorities need to consider any unmet need arising in neighbouring authorities. Paragraph 11 also states that 'plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change'. It is therefore important that it is demonstrated through the Leicester Local Plan that all options have been considered to meet the development needs arising within the city, before any unmet need is considered beyond the city.

It is recognised that there is finite land for growth within the city. The administrative boundary of the city is tightly drawn around the urban area, and compared to many other cities Leicester is comparatively compact with few remaining large undeveloped areas of land or brownfield land available for re-use (other than that already identified in the plan). However it is important that a thorough attempt has been made to identify all potential options to accommodate growth in the city, with it being the most sustainable location for growth in the HMA. Alongside assessing all land options it is important that land identified for development is used efficiently. There is an

opportunity to revisit assumptions around the capacity of sites to ensure land is being used efficiently and higher densities are supported where appropriate – it is understood that the capacity of non-strategic sites is based on 30 dwellings per hectare which is considered at the lower end for an urban environment and low compared to past development in Leicester.

The plan sets out policies for tall buildings in the city. It is important that taller buildings, where appropriate, are supported to ensure efficient use of land and help meet the city's housing need. Consideration should be given to the sustainability of locating development in the heart of the city compared to less sustainable locations away from the city in more rural areas. This would also accord with NPPF para 123(a) which refers to significantly uplifting the density of residential development in city and town centres that are well served by public transport.

Overall it is important that the local plan is maximising opportunities for residential growth. It is not clear in the plan what alternative options have been considered to accommodate such growth - for example the role of modern/alternative construction methods or maximising residential growth over employment growth. The bullet points under 4.11 list options for meeting housing need in the city, but these are generally the methods in which the plan is proposing to accommodate need. It doesn't highlight any alternative options that have been considered or the reasons why they have not been taken forward. It would be helpful to understand what options have been assessed and why the strategy in the draft plan is considered the most appropriate.

It is also noted that no allowance has been made for proposed allocated housing sites not being delivered during the plan period. It is to be expected that, for various reasons, some allocated sites will not come forward for development and this would have a consequent impact on the overall delivery of housing in the city. It is not clear in the plan if during the plan period that should levels of housing provision fall behind whether the intention is that this will be addressed through a review of the plan, or if restrictive policies will be 'loosened' to allow housing shortfalls to be made up elsewhere in the city. The alternative would be increased unmet need with the burden falling on the Leicestershire authorities. The plan needs to be clearer in terms of flexibility and how it will deal with possible shortfalls in housing provision.

Along with the quantum of development, it is important that authorities expected to accommodate any unmet need are able to understand issues around the size, type and tenure of housing that will be needed to meet this unmet need, to allow those authorities to plan for the right type of development. Similarly an understanding of the type and size of employment land to be accommodated outside of the city is important.

### **Leicester Urban Area**

The plan should provide more clarity on the concept of the 'Leicester Urban Area'. At paragraph 1.3 it states that the 'purpose [of the plan] is to provide the overall strategic and spatial vision for the future of the Leicester Urban Area'. Paragraph 2.2 then explains that the Leicester Urban Area covers the administrative area of the city and a number of other settlements that fall close to but outside the city boundary in adjacent local authority areas.

It is important that the Leicester Local Plan considers cross-boundary issues however it should be made clear early on in the plan that the policies and proposals in the plan only apply within the administrative boundaries of Leicester City. Paragraph 1.3 has the potential to unintentionally confuse by stating the plan sets the vision for the wider urban area. It is recommended that this is reconsidered in the next iteration of the draft plan.

### **Infrastructure Provision**

The commitment at paragraph 4.17 of the draft plan to ensure growth is supported by infrastructure and facilities is welcome, as is the commitment to work closely with neighbouring authorities on needs arising from growth and development beyond the city boundary. This must also take into

consideration the infrastructure requirements of growth beyond the city boundary as a result of accommodating unmet need from the city. The city is the most sustainable location for new development in the HMA and growth in less sustainable locations, to accommodate the city's unmet need, will have the potential for significant infrastructure and highway implications for those areas. Proper consideration should be given to how these impacts can be mitigated.

### **City centre land uses**

The draft local plan was prepared pre-Covid 19 and since then we have seen unprecedented significant behavioural and societal changes including a massive shift to home working for those who are able and rapid growth in online retail with less reliance on high street shops. Whilst it is recognised that there is significant uncertainty at this time of the longer term implications of a post Covid world it is possible we may see changing demand for office and retail space in city centres, and potentially the freeing up of surplus space/land within city centres for other uses. It is important that these considerations are taken into account as the plan is revised albeit in the knowledge of the uncertainty of these longer term societal changes. It is noted at paragraph 4.18 that a retail study is to be undertaken to support the plan and this would be an opportunity to assess potential future implications of a post Covid environment.

### **Green Wedge Policy**

The Rothley Brook Green Wedge falls within both Hinckley and Bosworth and Leicester City (and also the administrative areas of Blaby and Charnwood). Since Green Wedge policies were introduced in the Leicestershire Structure Plan in 1987 they have remained an important policy tool guiding development across the HMA. Hinckley and Bosworth Borough support a strong approach to Green Wedges as a policy tool to prevent the merging of settlements, to guide development form, to provide a green lung into urban areas and to provide a recreational resource. The Borough therefore supports policy OSSR01 of the draft local plan. As a note diagram 15 on page 159 needs to be updated to take account of the proposed development allocations in the plan, for example several of the strategic sites locations are shown as green wedge in this diagram.

We look forward to continue working with Leicester City Council in the development of our respective local plans and on wider cross boundary planning issues.

Yours faithfully,

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Hinckley and Bosworth Borough Council