

Leicester City Local Plan/Unmet Need



Grant Butterworth Head of Planning Leicester city Council
December 2022



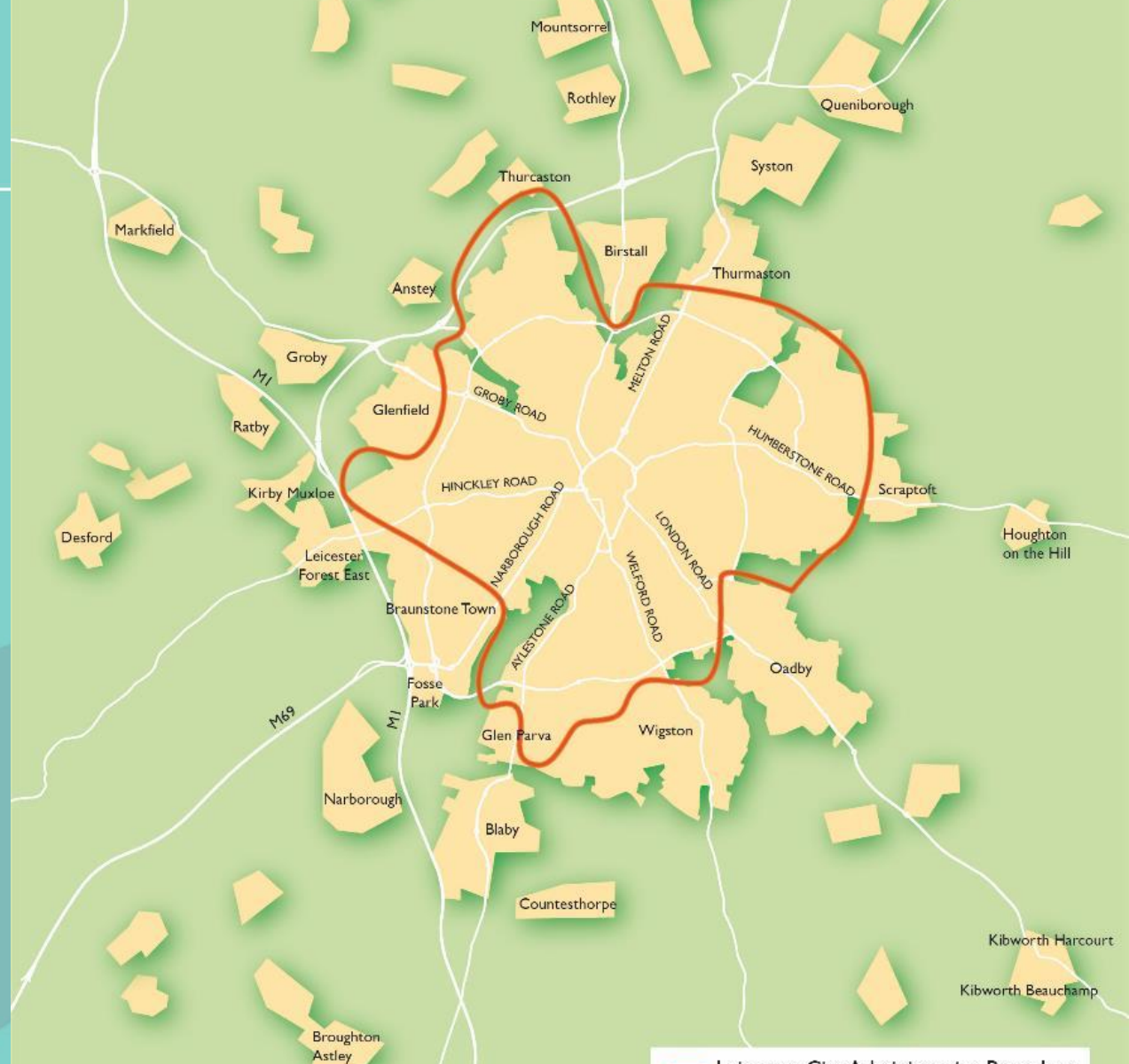
Outline

- Context
- Constraints
- City Growth
- Previous Consultations/Evidence
- Response to Regulation 18 Consultation
- Regulation 19 Consultation
- Conclusions
- Questions



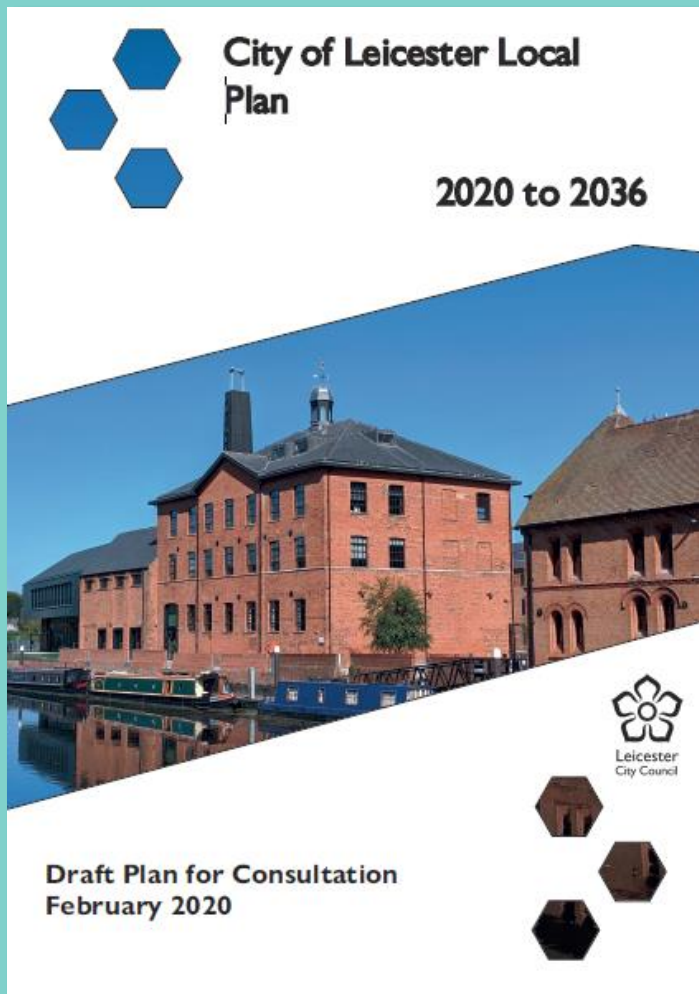
A Growing City

- Leicester has already grown through the boundary and will continue to do so
- Strategic Growth Plan – approved to shape the future of Leicester and Leicestershire to 2050
- Recognised c 1/3 City growth need to be redistributed to Districts to 2031
- Housing need is assessed on Housing Market Area basis- it is L&L need



Regulation 18 Draft Plan 2020

Robustly tested
Target 1,712 pa
7,742 unmet



City of Leicester Local
Plan

2020 to 2036

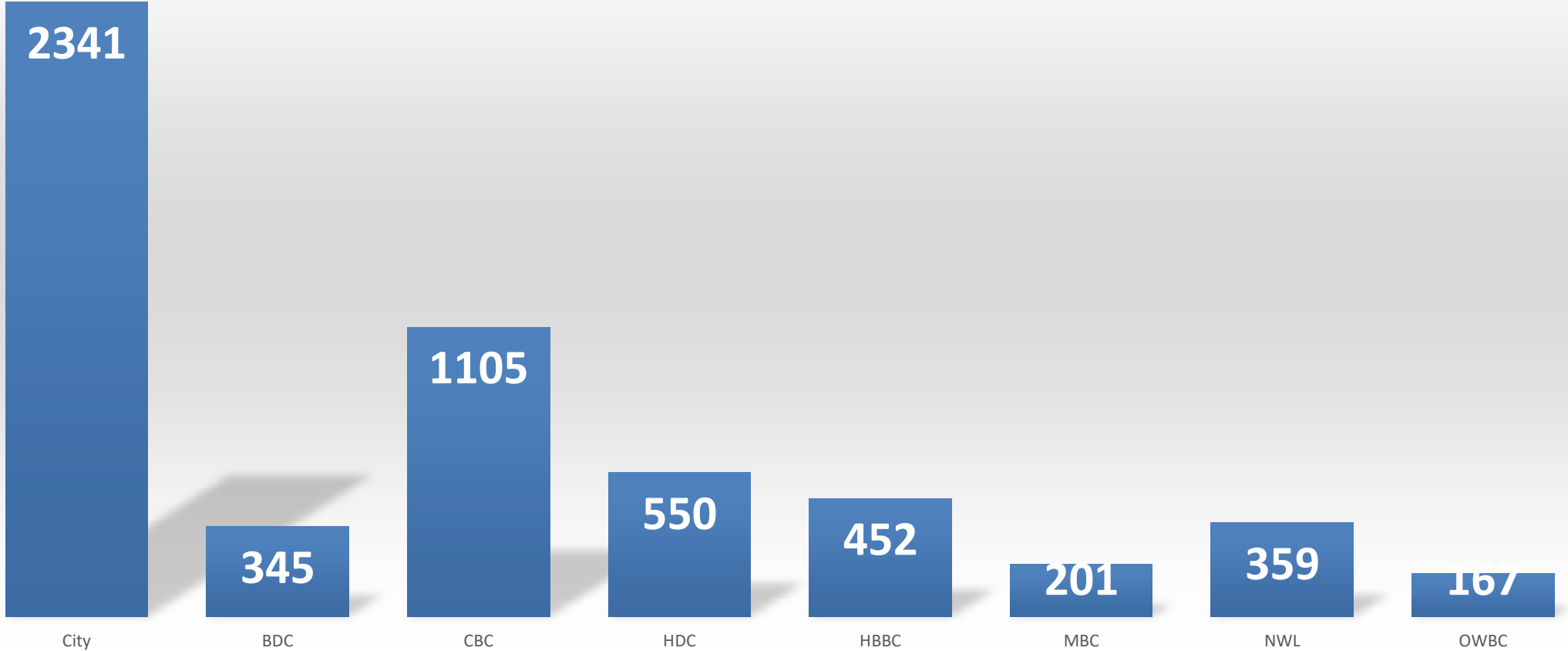
Draft Plan for Consultation
February 2020

Leicester
City Council

Table 1: Housing provision from 2019-36

	Component	Dwellings
A	Housing Need 2019-36 (Standard Method 2019)	29,104 (1,712 dwellings per annum)
	Commitments	
B.	Commitments major developments detailed permissions and outlines	9,827
D.	Saved previous Local Plan allocations	0
E.	Reserved matters applications with a resolution to grant subject to s106 agreements.	0
H.	Small sites allowance / windfalls based on past rate	2,550 (150dpa based on past delivery rate)
J.	Allocations identified in the draft plan	1,486
K.	City centre capacity work	4,905
L.	Strategic sites	2,594
N.	Total capacity within the city	21,362
O.	Remainder need to be accommodated within the HMA (A-N)	7,742

+35% Need



City

BDC

CBC

HDC

HBBC

MBC

NWL

OWBC

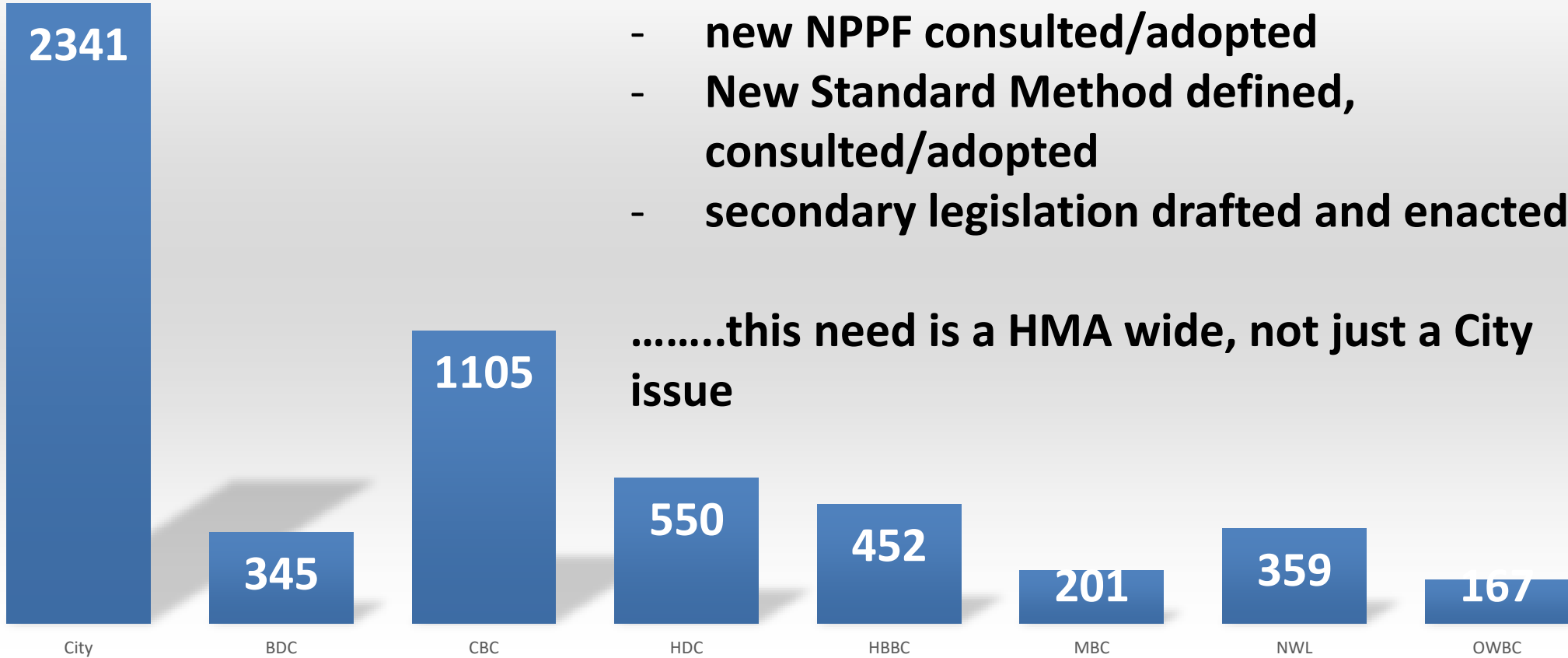
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+35% Need

Until:

- LURB is enacted
- new NPPF consulted/adopted
- New Standard Method defined, consulted/adopted
- secondary legislation drafted and enacted

.....this need is a HMA wide, not just a City issue



City

BDC

CBC

HDC

HBBC

MBC

NWL

OWBC

Leicester City Council

Context: Local Position

- No substantive challenge to the City Reg 18 Local Plan 2020 consultation from Council partners nor Development Industry (unmet need c. 8,000)
- City Council now have approved Submission Draft Plan for final 6 week consultation and submission in early 2023 (unmet need now 18,700 due to Govt uplift)
[Local Plan documents for Full Council - Page 1 of 3 - Leicester City Council - Citizen Space](#)
- Charnwood Inspectors supported Statement of Common Ground and proposals for City's Unmet Need
- Essential for City Plan to progress for this need to be dealt with

Context: Government Policy Position

Would delay put L&L authorities in a better position?

- White Paper ambition has been hugely scaled back
- Levelling Up Bill- uncertain timescales and much detail deferred to Secondary legislation
- No quick replacement for Standard Method for Housing target
- Even if LURB is enacted, Secondary Legislation, new NPPF, further consultation, Regulations, Guidance (and Pilots?) likely to take until beyond next General Election?

This means uncertainty for all of us

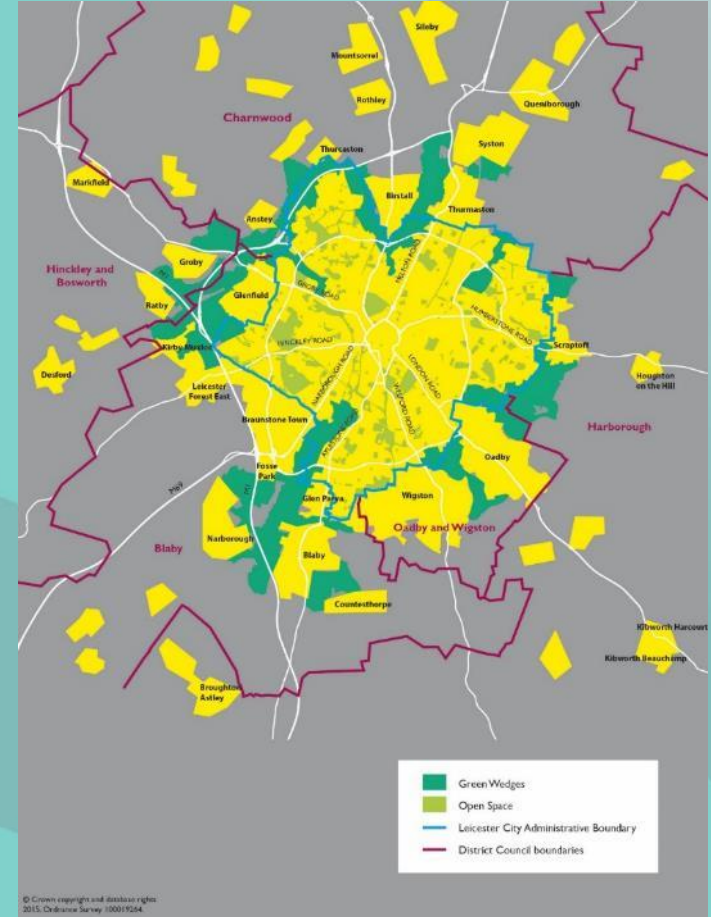
- Facing 5 Year Land Supply threats of unplanned development across city and County
- 35% increase- Dec 2020 Need has to be dealt with for the foreseeable future
- This unmet need will also go up each year



Planning Balance/Impossible choices

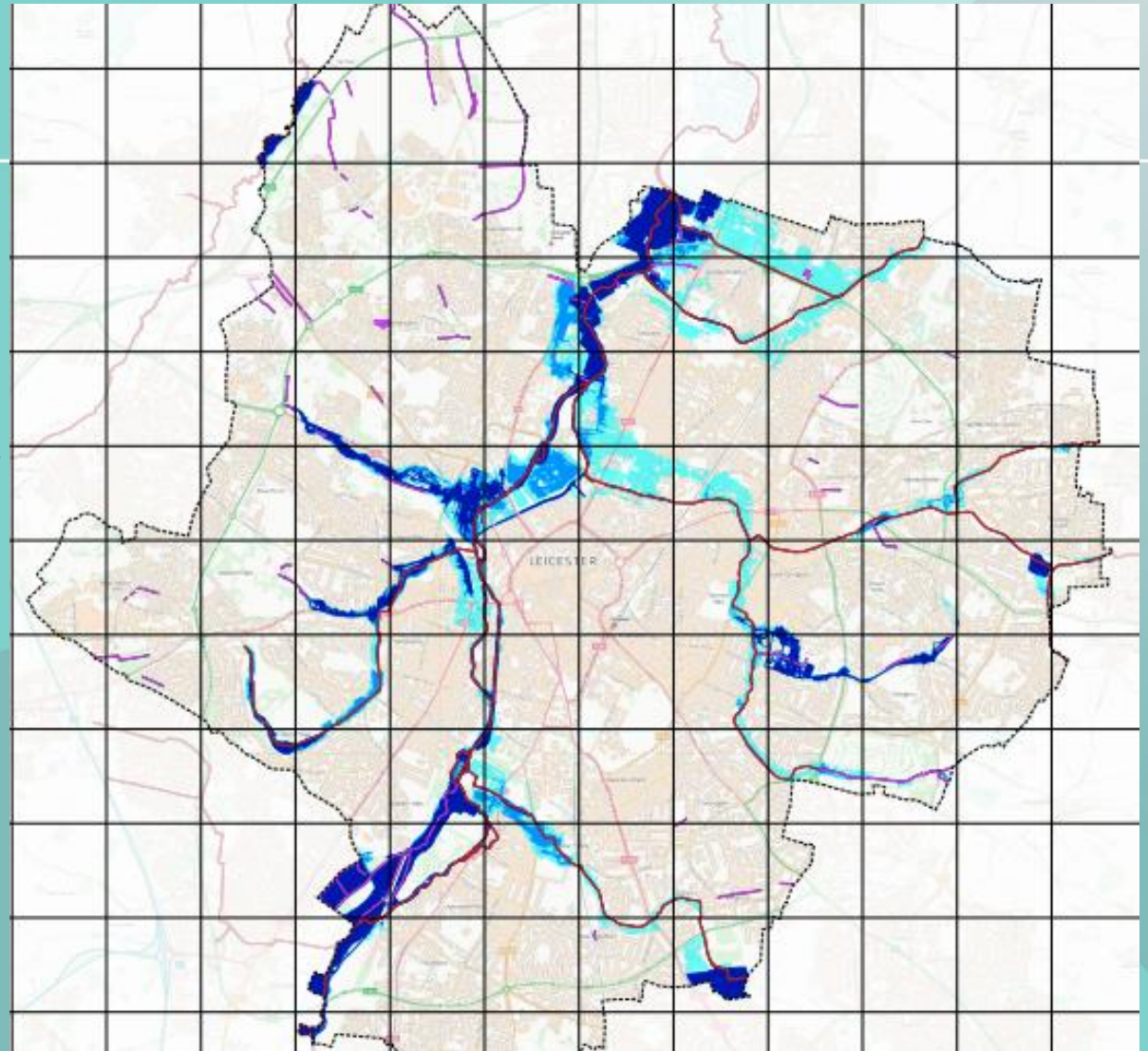
Not just Housing need

- Education
- Employment
- Open space- adopted Core Strategy standard: 2.8ha
- Health issues: huge post COVID emphasis on need for open space
- Sport England
- Many constraints.....



Constraints

- Flooding
- Viability constraints
- Infrastructure constraints
- Biodiversity and Environment Act challenges on our promoted sites
- Heritage- huge historic legacy to protect





Leicester
City Council



Leicester
City Council

Strategic Flood Risk Assessment
2022

Drawing Title
Interactive Map 06

0 100 200 300 400 m



LEGEND

 Leicester boundary

WATERCOURSES

 Mapped Ordinary Watercourses

 Statutory Main Rivers Leicester

FLOOD ZONES

 Flood Zone 3b

 Flood Zone 3a

 Flood Zone 2

FLUVIAL EXTENTS

 Fluvial 1 in 20 annual chance

 Fluvial 1 in 100 annual chance

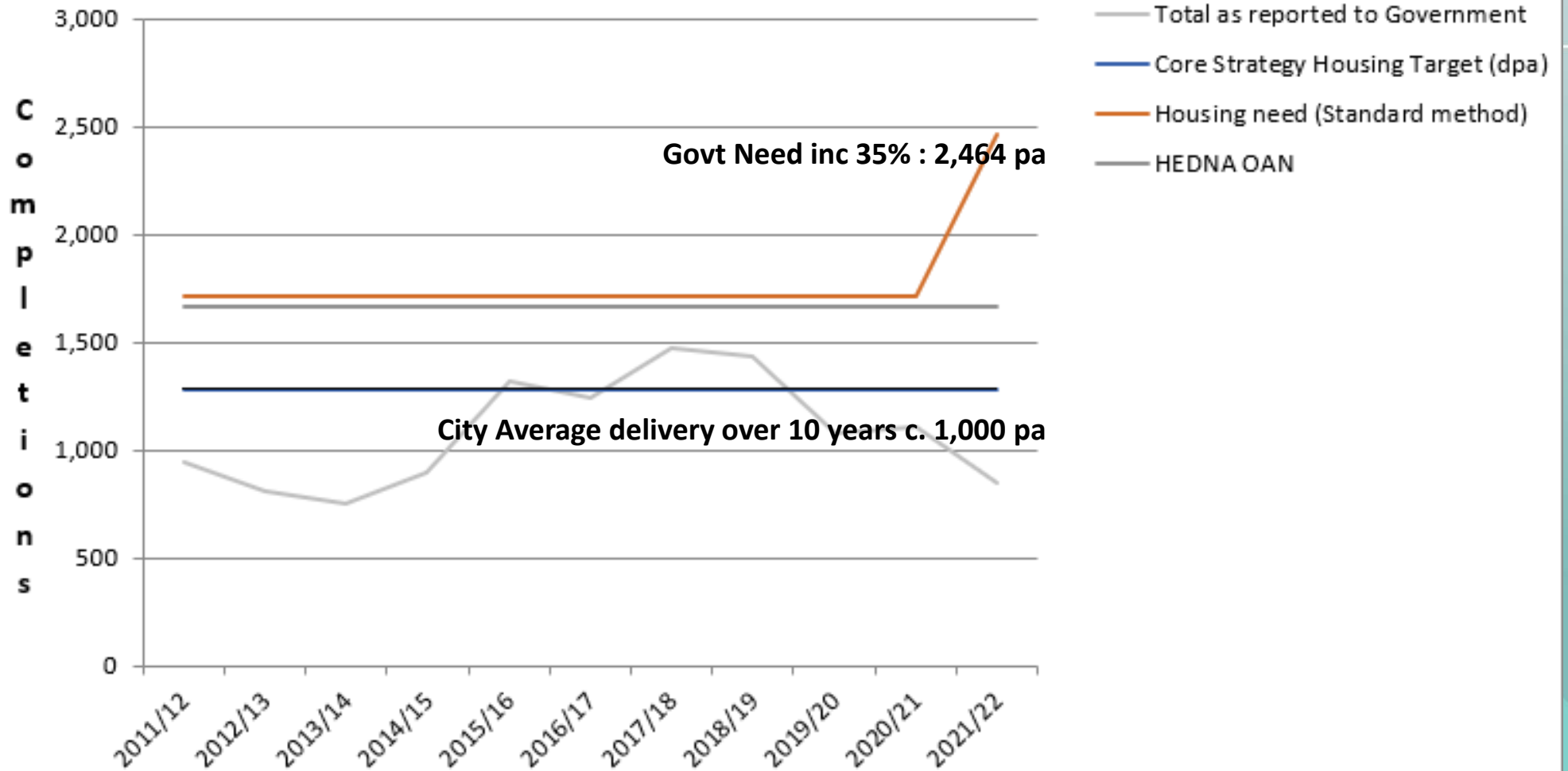
 Fluvial 1 in 100+30%

 Fluvial 1 in 100+50%



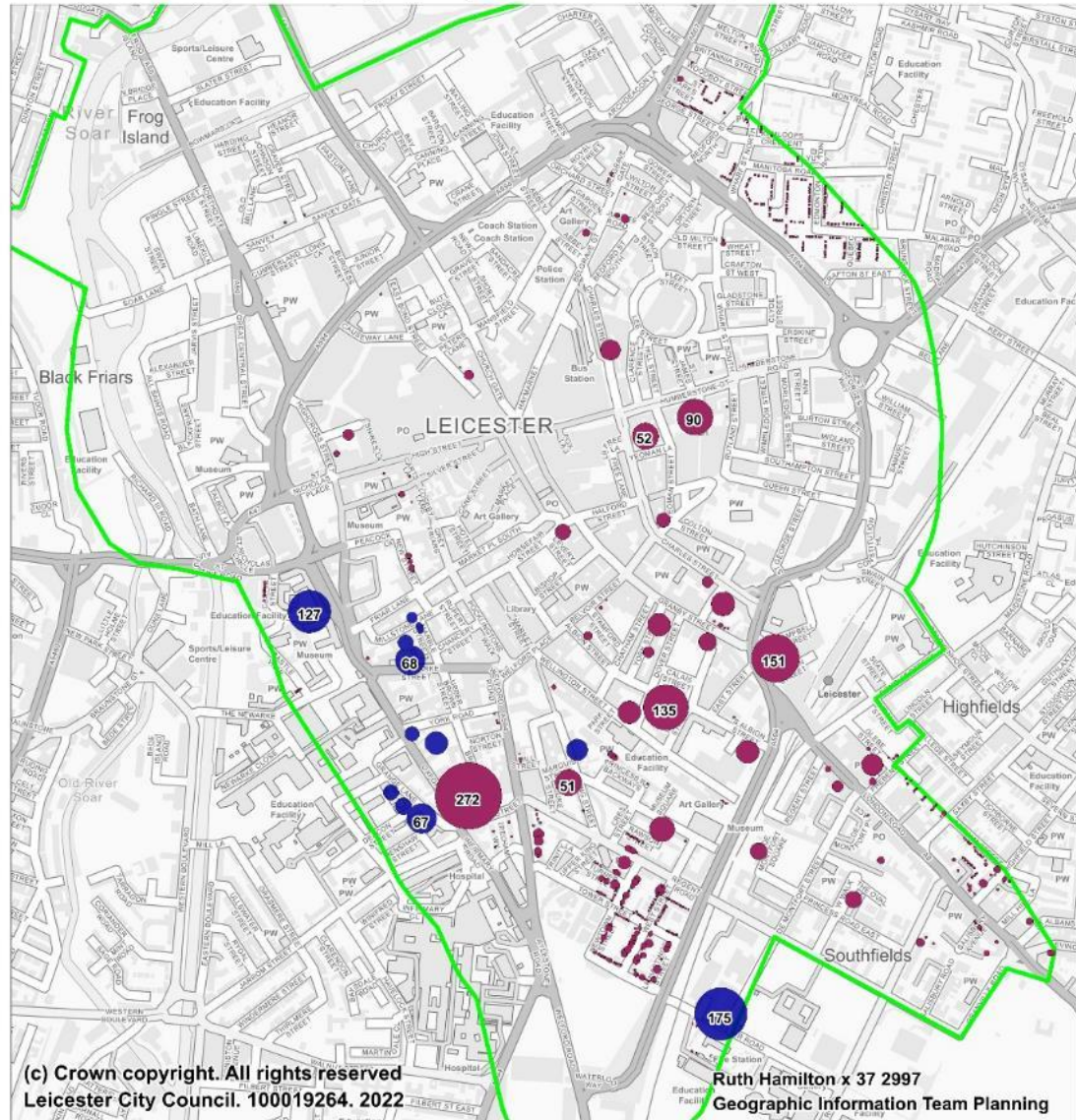
305000

Housing completions since 2011





Residential Developments Completed By Year - Central Area Up to 2005



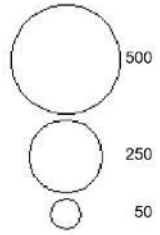
Labels - Number of Units (Over 20)

Domestic Properties (Non Purpose Built Student)

By Complete Date (Circa)

- Prior_2005
- 2005 to 2009
- 2010 to 2014
- 2015 to 2019
- 2020 onwards
- Under Construction

Count of Units



Purpose Built Student

By Complete Date (Circa)

- Prior 2005
- 2005 to 2009
- 2010 to 2014
- 2015 to 2019
- 2020 Onwards
- Under Construction

Central Area



Planning Application (Approvals & On Hand)

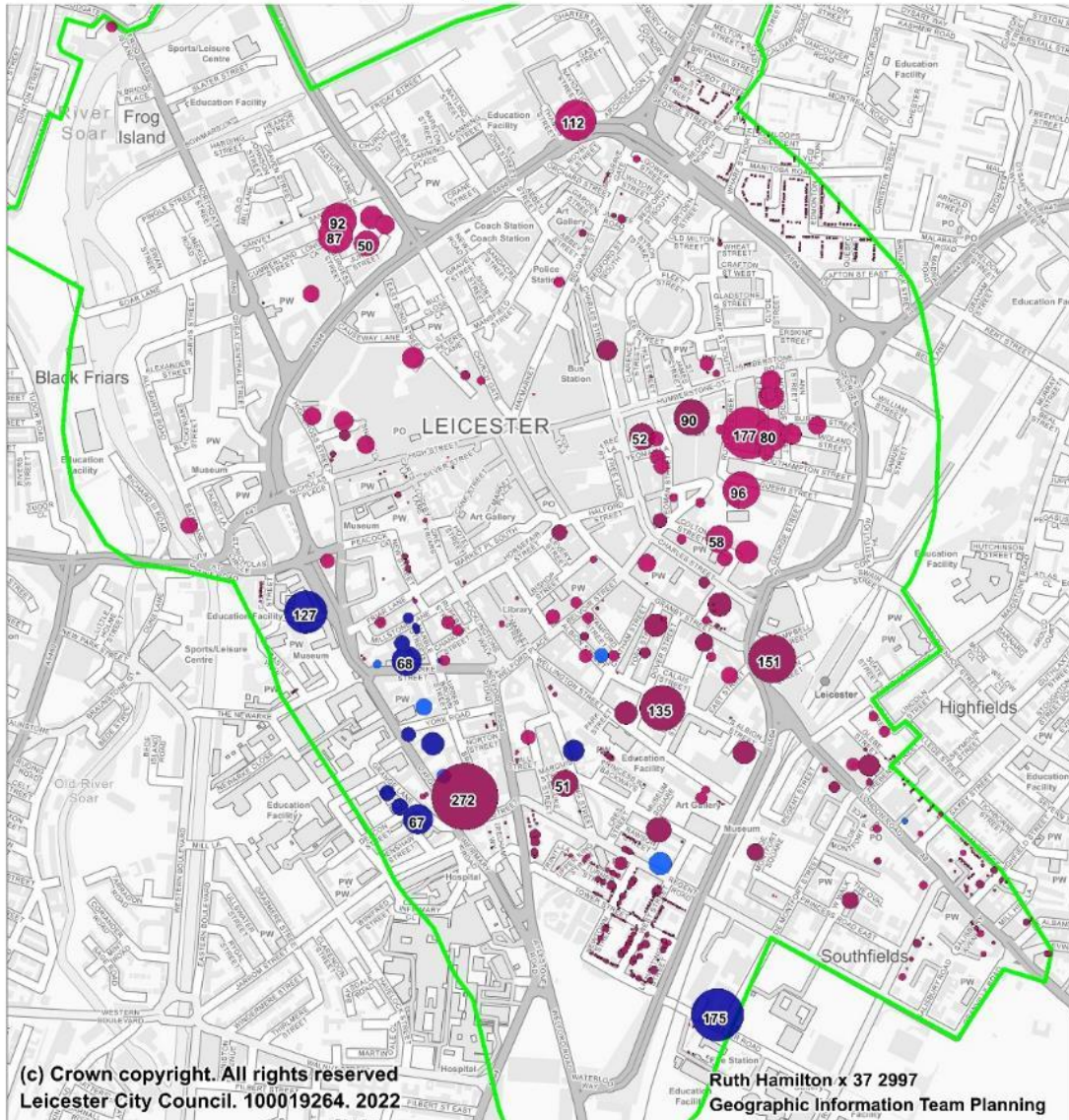
Grouped By Block

- Planning Approvals - Non PB Student
- Planning Approvals Purpose Built Student

Grouped By Block



Residential Developments Completed By Year - Central Area Up to 2010



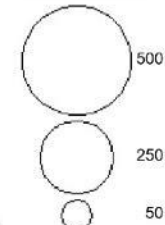
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Purpose Built Student

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- Under Construction

Central Area



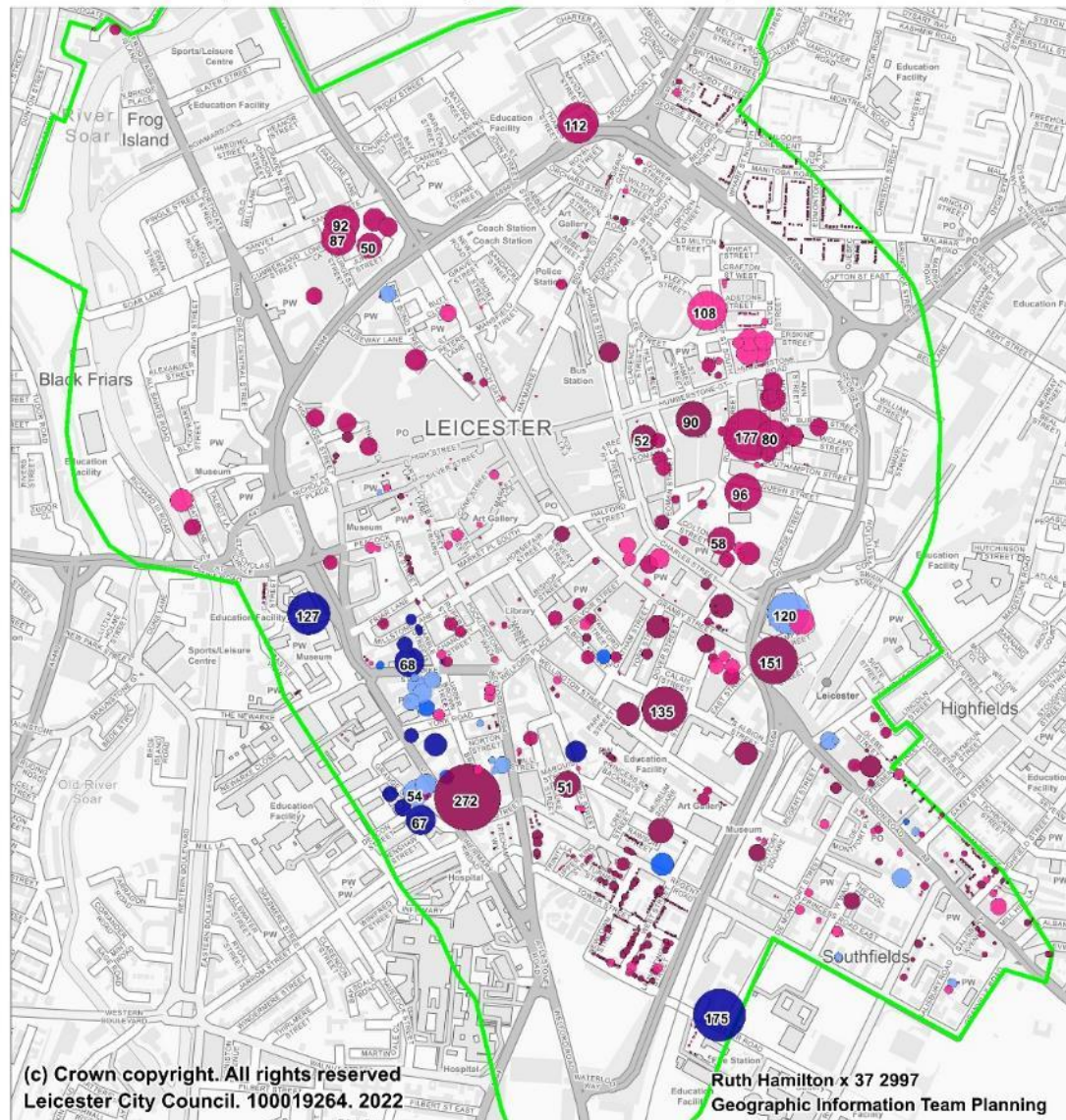
Planning Application (Approvals & On Hand)

Grouped By Block

- Planning Approvals - Non PB Student
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Grouped By Block

Residential Developments Completed By Year - Central Area Up to 2015



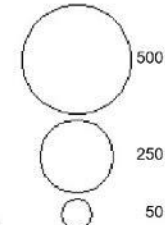
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Domestic Properties (Non Purpose Built Student)

By Complete Date (Circa)

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- 2015 to 2019
- 2020 onwards
- Under Construction

Count of Units



Purpose Built Student

By Complete Date (Circa)

- Prior 2005
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- 2010 to 2014
- 2015 to 2019
- 2020 Onwards
- Under Construction

Central Area



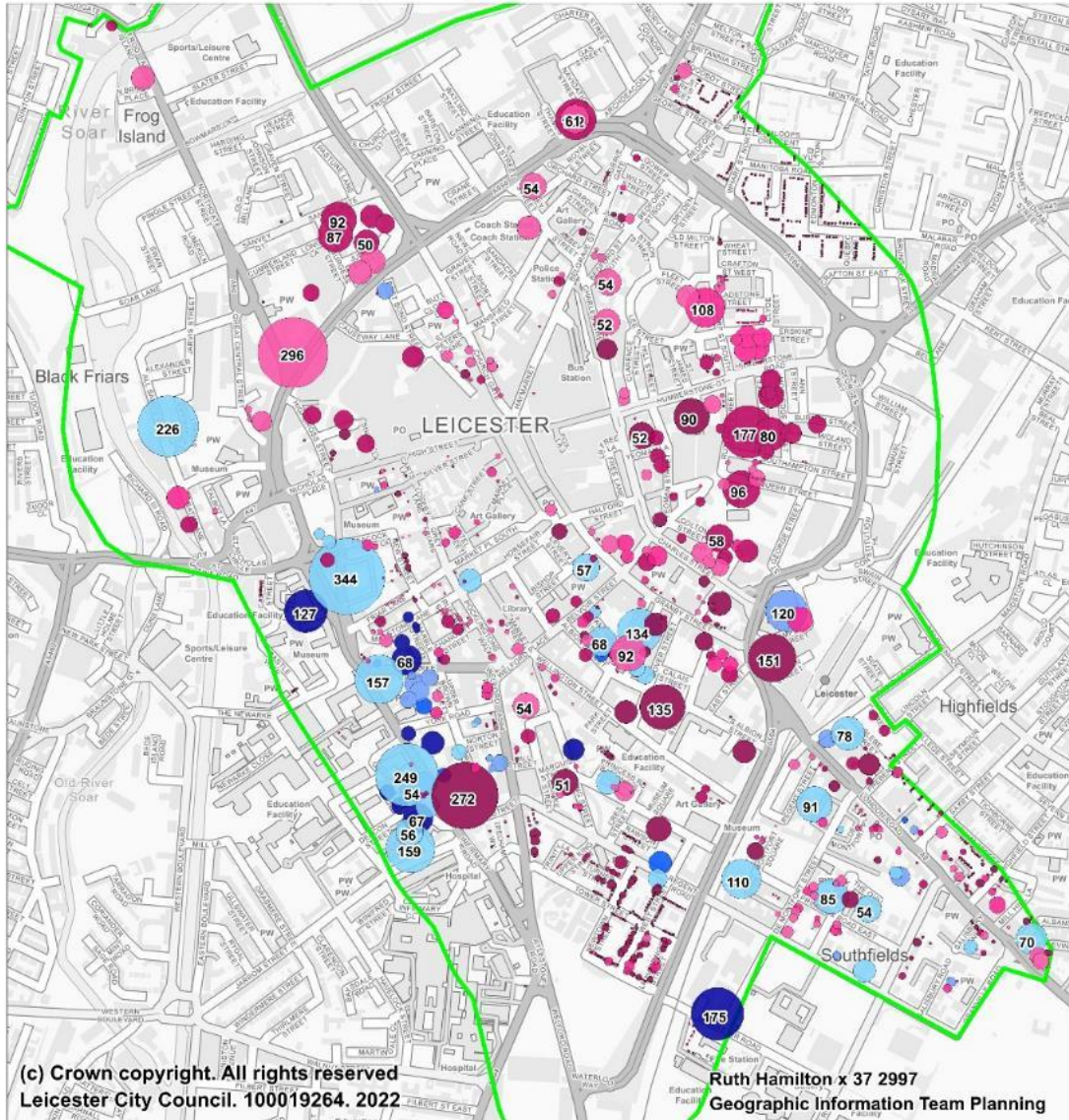
Planning Application (Approvals & On Hand)

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Grouped By Block

Residential Developments Completed By Year - Central Area Up to 2020



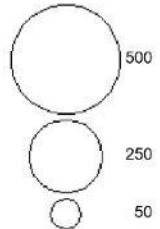
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Domestic Properties (Non Purpose Built Student)

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Count of Units



Purpose Built Student

By Complete Date (Circa)

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- 2020 Onwards
- Under Construction

Central Area



Planning Application (Approvals & On Hand)

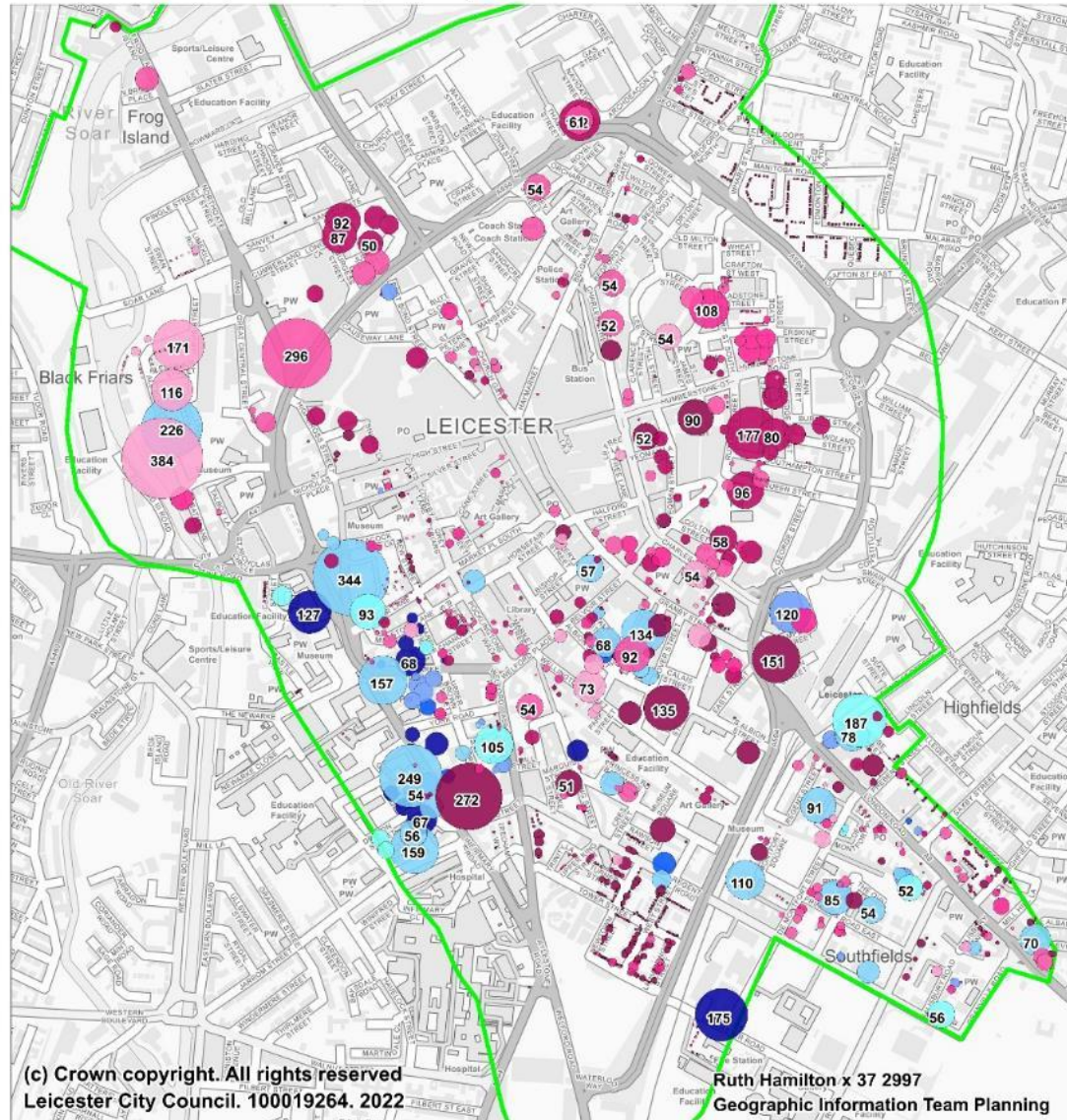
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Grouped By Block



Residential Developments Completed By Year - Central Area Up to 2022



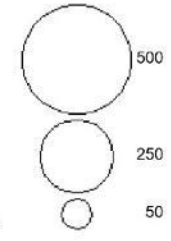
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Domestic Properties (Non Purpose Built Student)

By Complete Date (Circa)

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- Under Construction

Count of Units



Purpose Built Student

By Complete Date (Circa)

- Prior 2005
- 2005 to 2009
- 2010 to 2014
- 2015 to 2019
- 2020 Onwards
- Under Construction

Central Area



Planning Application (Approvals & On Hand)

Grouped By Block

- Planning Approvals - Non PB Student
- Planning Approvals Purpose Built Student

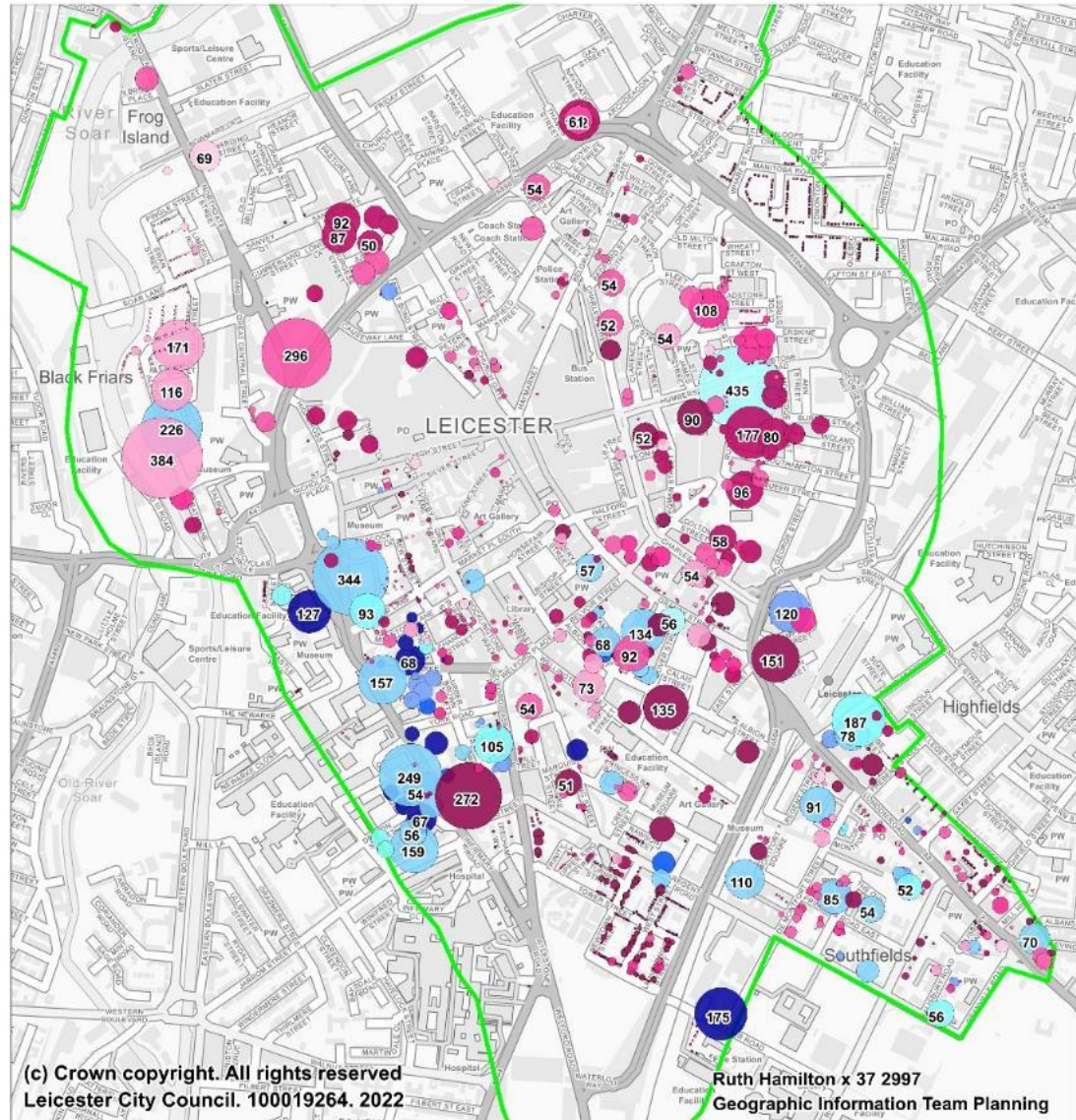
Grouped By Block

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Ruth Hamilton x 37 2997
Geographic Information Team Planning



Residential Developments Completed By Year - Central Area Up to 2022 and Under Construction



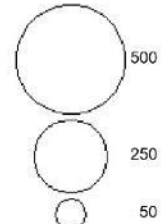
Labels - Number of Units (Over 20)

Domestic Properties (Non Purpose Built Student)

By Complete Date (Circa)



Count of Units



Purpose Built Student

By Complete Date (Circa)

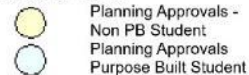


Central Area



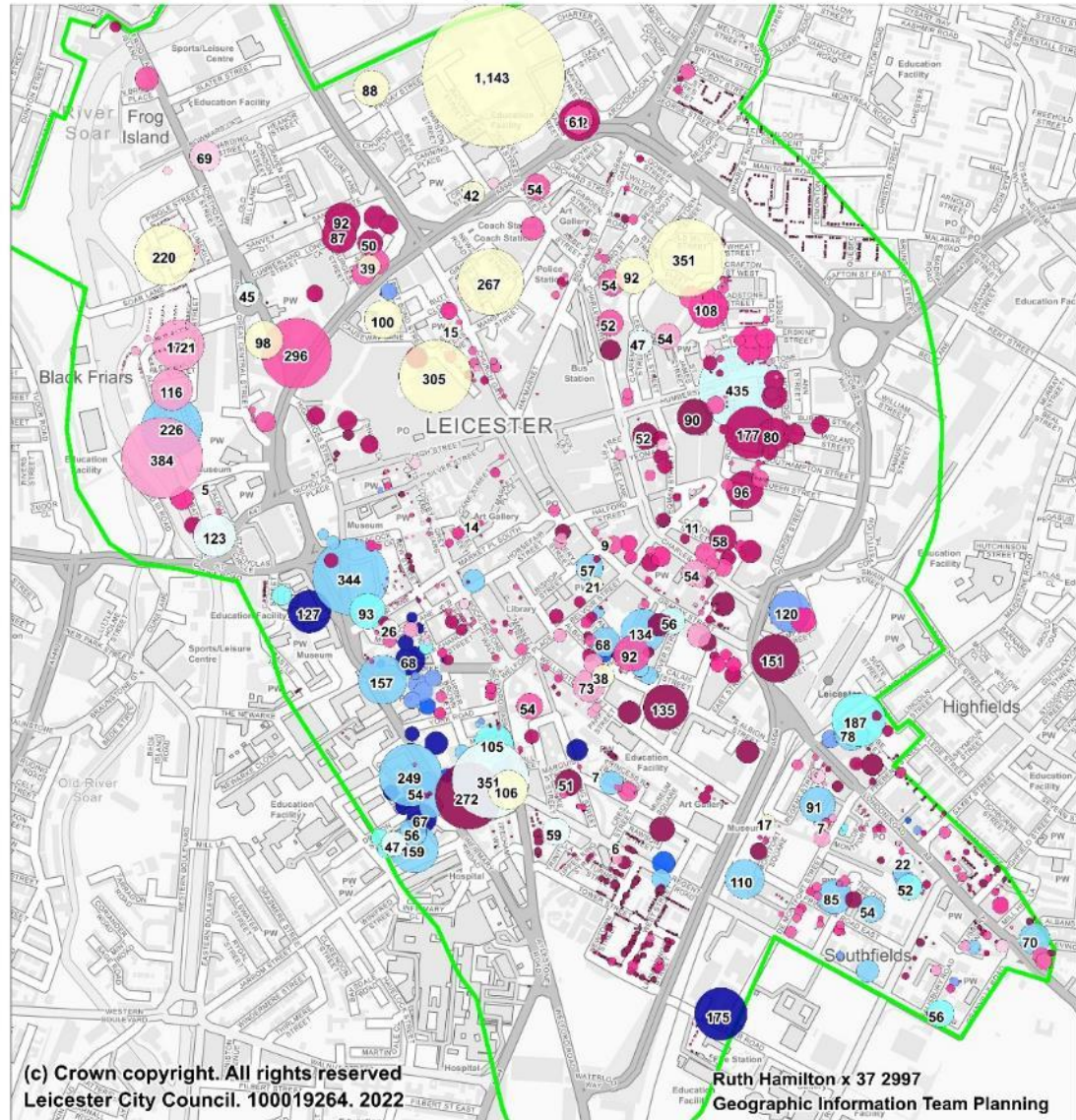
Planning Application (Approvals & On Hand)

Grouped By Block



Grouped By Block

Residential Developments Completed By Year - Central Area Up to 2022, Under Construction and Planning Applications



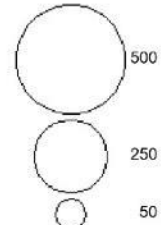
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Count of Units



Purpose Built Student

By Complete Date (Circa)

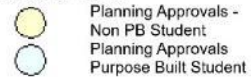


Central Area



Planning Application (Approvals & On Hand)

Grouped By Block



Grouped By Block

What further available and deliverable sites do we have?

Leicester City Council Strategic Housing & Economic Land Availability Assessment
September 2022

- **Over 1,000 sites assessed**
- **115 page assessment available here:**
- [leicester-city-council-shelaa-november-2022.pdf](#)

Strategic Housing & Economic Land Availability Assessment September 2022

Appendix A: List of achievable SHELAA sites

Site Number	Site name	Hectares	Brownfield/ Greenfield	Timeframe	Estimated Dwellings	Deliverable	Developable	Suitable	Available	Achievable
015	Land to south of St Augustine Road/west of Duns Lane	2.02	Brownfield	6-10 Years	63	No	Yes	Yes	Yes	Yes
031	241 Loughborough Road - Rear of Bestway	2.90	Brownfield	6-10 Years	54	No	Yes	Yes	Yes	Yes
032	169-175 Walnut Street	0.07	Brownfield	6-10 Years	5	No	Yes	Yes	Yes	Yes
061	Advance Tapes, Abbey Meadows	1.70	Brownfield	6-10 Years	70	No	Yes	Yes	Yes	Yes
121	216 Jarrom Street/219 Walnut Street	0.07	Brownfield	6-10 Years	5	No	Yes	Yes	Yes	Yes
168	13 Southampton Street	0.14	Brownfield	6-10 Years	7	No	Yes	Yes	Yes	Yes
219	Land rear of Rosedale Avenue/Harrison Road allotments	1.83	Greenfield	6-10 Years	46	No	Yes	Yes	Yes	Yes
222	Evington Valley Road (Former Dunlop Works) (PS09b18) (Northern half of PSO area)	2.37	Brownfield	5 Years or less	45	No	Yes	Yes	Yes	Yes
231	384 Gipsy Lane	0.12	Brownfield	6-10 Years	4	No	Yes	Yes	Yes	Yes

Extensive Plan development work

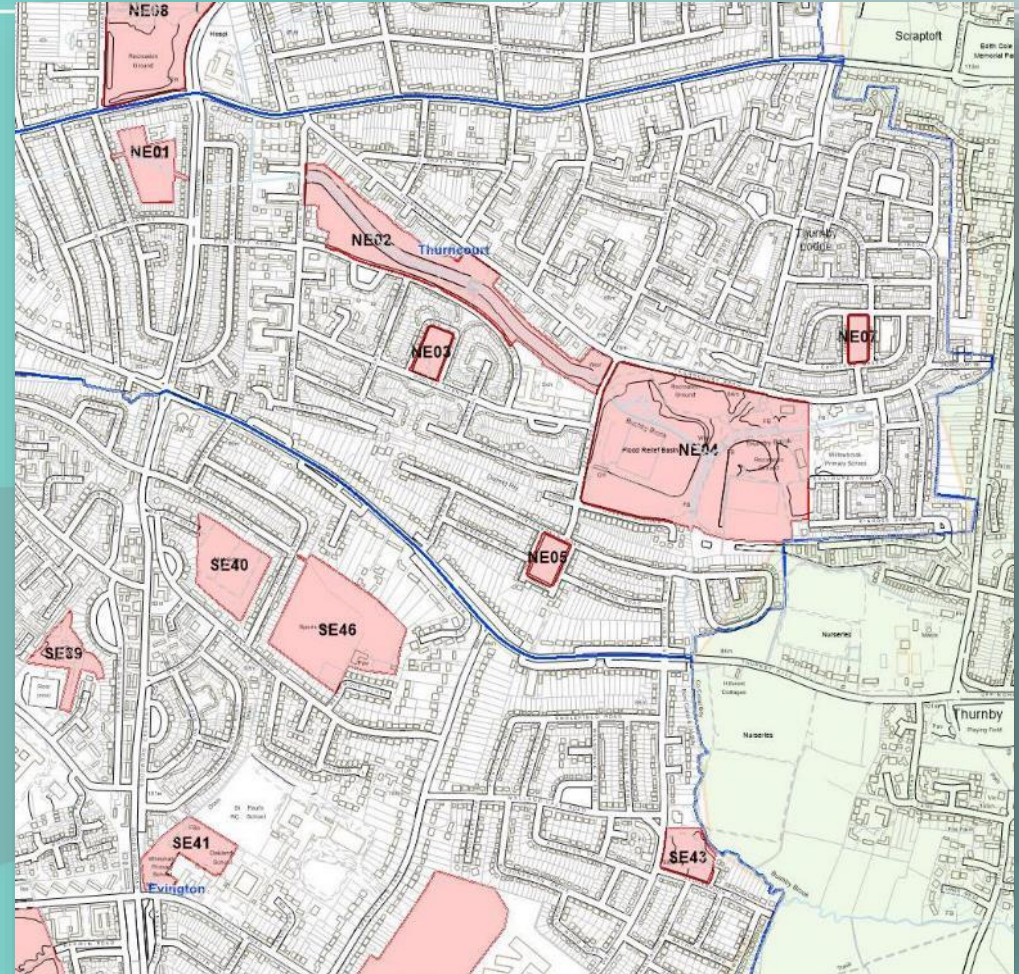
Ongoing Calls for Sites

3 Previous Consultations:

- Issues and Options
- Emerging Options (2017)
- Preferred Option (Reg 18) (2020)

Next stage:

- Submission Plan Consultation January 2023 (Reg 19)
- Local Plan: Initially consulted on 270 sites at Emerging Options stage 2017 (85% city owned)
- City centre potential including viability
- Implications of students/tall buildings/space standards considered

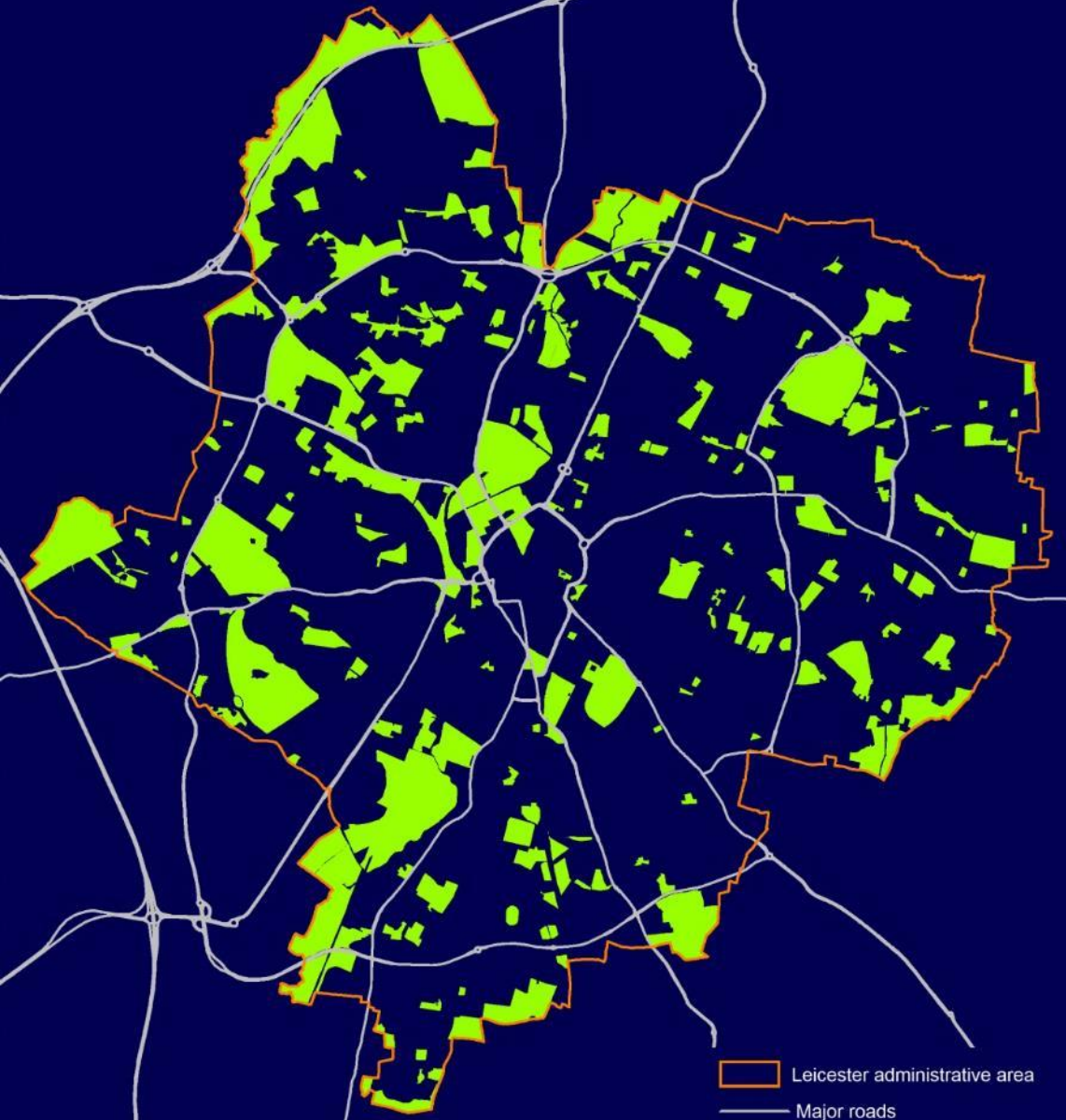


Local Plan: Initial Emerging Options Consultation

Plan showing all potential sites consulted in 2017

270 sites in total

Many of these have constraints such as flooding, Heritage, Biodiversity



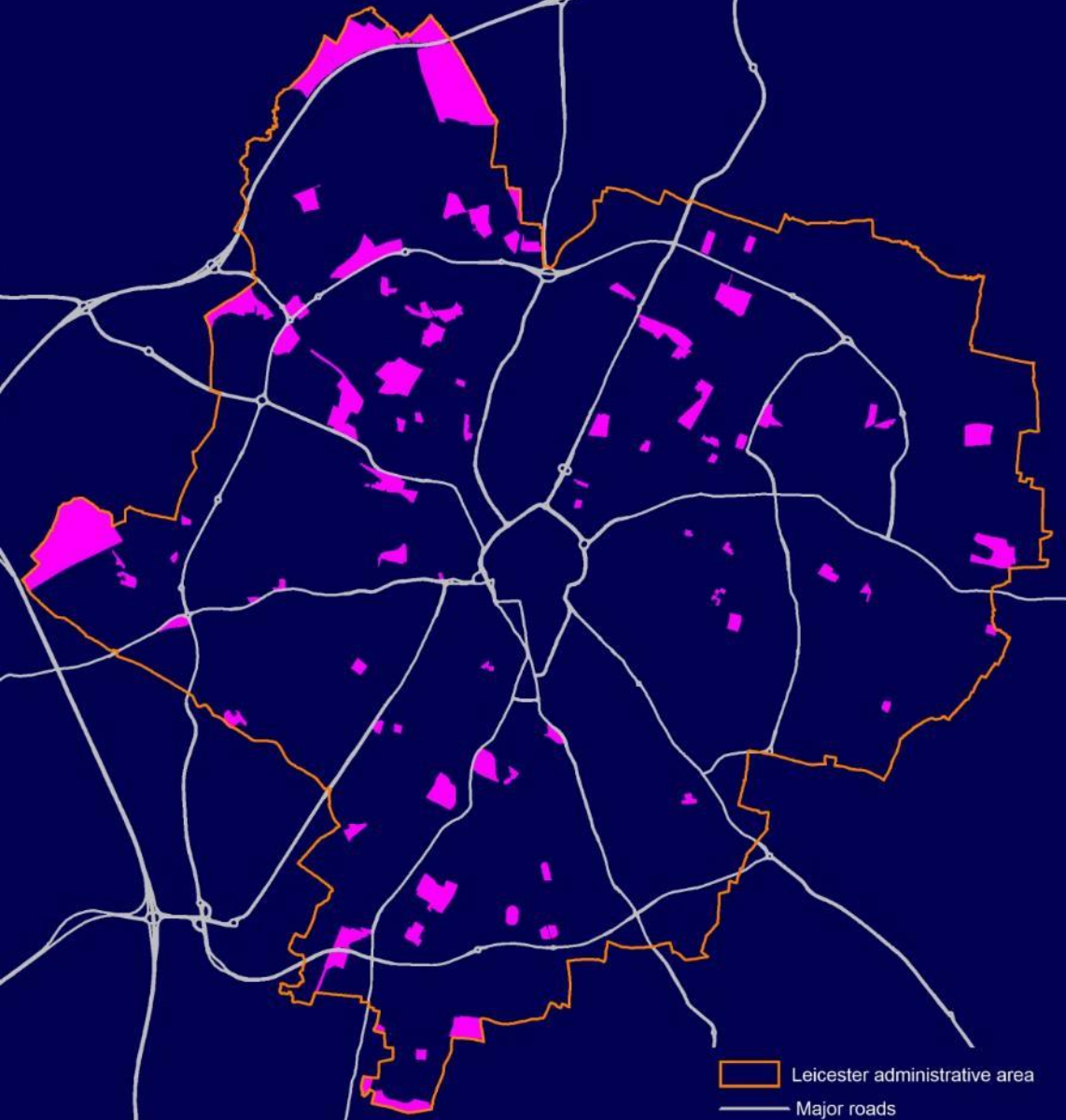
Local Plan: Reg 18 Consultation

Extensive consultation (COVID)

Sites without significant flooding,
heritage and biodiversity constraints

Assessed as deliverable

Generally accepted by Development
industry and council partners



Response to Reg 18

- Districts and County challenged us to do more work
- Limited challenge to supply work from Development industry
- Poor response to various Call for Sites- unconstrained sites very scarce
- Majority of sites are council promoted

Work Undertaken by City Council Since Regulation 18: Local Plan and Evidence now published 24th November 22

- Assessed and considered responses received to consultations
- Views submitted by County and Districts
 - Density and city centre capacity challenges
- Responded to points raised in PAS Assessment last year
- Updated Information sought from promoters of Strategic sites
 - Scale/deliverability?
 - Further design options?
- Smaller sites:
 - Any additional sites?
 - Any Sites which may not progress?
- Sustainability Appraisal Update
- Reviewed Site suitability and Achievability Assessments of sites in light of the above

- Updated SHELAA (Strategic Housing Employment Land Availability Assessment) including Brownfield Land Register sites including stakeholder consultation
- Further work commissioned to re-test and challenge City Centre capacity assessment work; new capacity study for Central Development Area
- Review of Character Area and Tall Buildings assessment work as part of the above
- Retail study updated- including at policy implications of new Class E
- Updated transport evidence
- Updated Climate evidence
- Updated Transport and Community Infrastructure assessment
- Updated Local Housing Needs assessment
- Reviewed Viability and deliverability of Plan and Policies
- Repeated Call for Sites and Developer forums



Local Plan: Reg 19 Submission Consultation

- This Local Plan consultation exhausts last substantial opportunities
- Regeneration opportunities substantially complete
- Follows further call for sites
- City centre capacity re-assessed

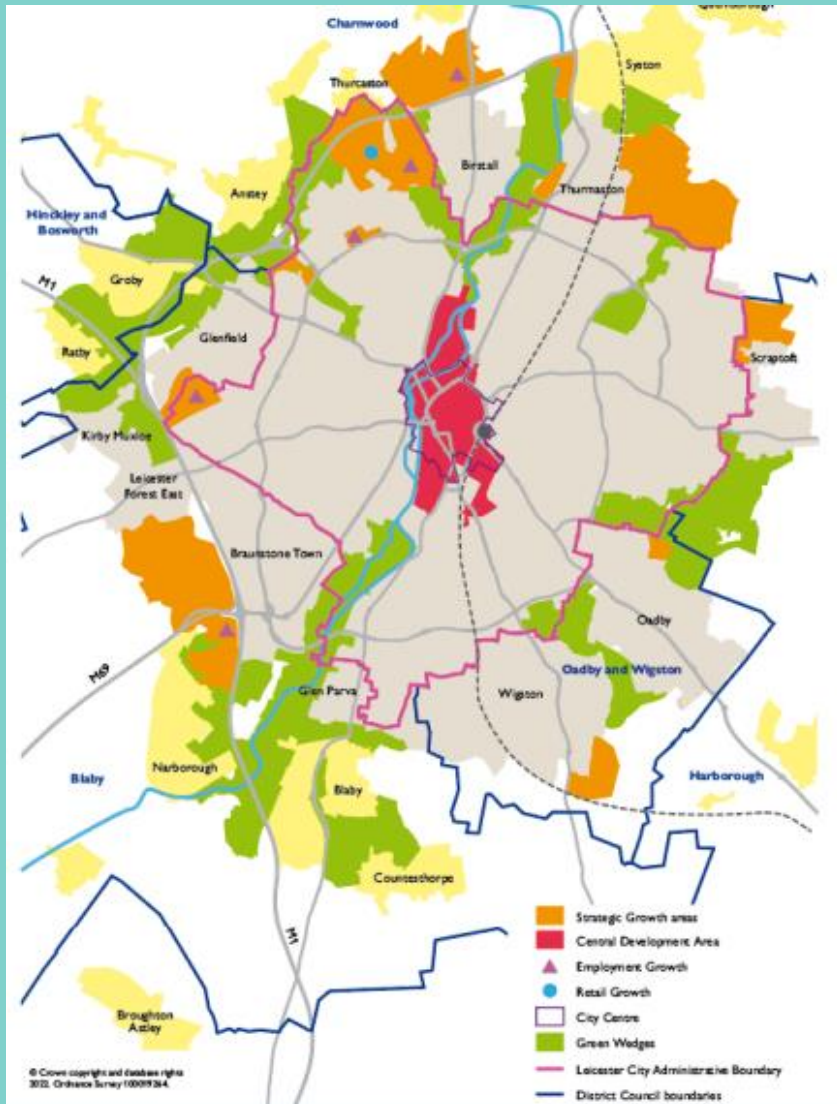


Table 1: Housing provision from 2020-36

	Component	Dwellings
A.	Housing Need 2020-36 (Standard Method 2021)	39,424 (2,464 dwellings per annum)
B.	Completions 2020-21	1,050
C.	Completions 2021-22	842
D.	Total completions 2020-22 (B + C)	1,892
	Commitments	
E.	Commitments: detailed and outline permissions	9,410
F.	Saved previous Local Plan allocations	0
G.	Windfall allowance	2,354 (214dpa for 11 years)
H.	Allocations identified in the draft plan	1,230
J.	Central Development Area capacity work	6,286
K.	Strategic sites	1,838
L.	Total anticipated supply within the city	21,118
M.	Overall supply (anticipated supply + completions) – D + L	21,118 + 1,892 = 23,010
N.	Local Plan Housing Target (2020-36) (Approximate 11% buffer)	20,730
O.	Unmet need	18,694

Note: Numbers have been rounded up.

Local Plan: Reg 19 Submission Consultation

- Plan and Evidence base-
<https://consultations.leicester.gov.uk/planning/local-plan-documents/consultation/subpage.2022-11-03.2107435895/>
- Includes:
 - SHELAA
 - CDA Capacity Study
 - Sites Assessment and selection documents
 - Full suite of evidence

Tall Buildings/Density

- Increased density Reg 18-Reg 19
 - Character Area assessments reviewed and updated
 - CDA- increased city centre capacity
- Viability considerations
- And- need to deliver the housing people want and need
- Historic England are resisting tall developments



Tall Buildings: Hammerson proposal

'Historic England therefore recommend that the application is withdrawn and amended. The amendments should include a considerable reduction in height of all elements of the building and the design should be informed by the existing local character.'

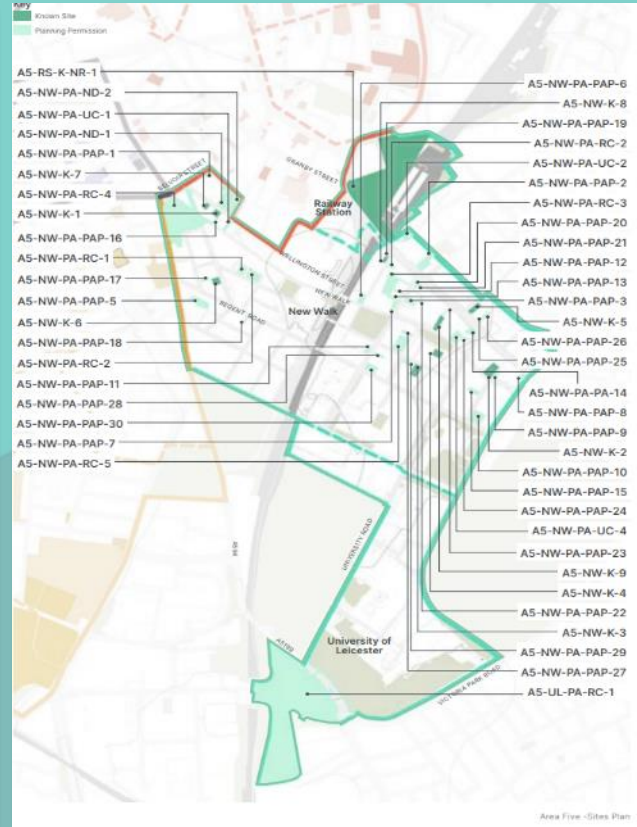
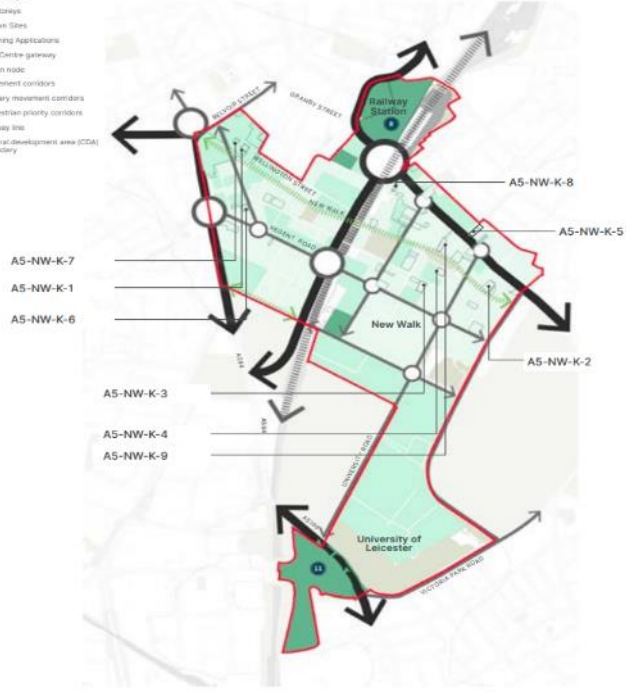
Recommendation

- Historic England has concerns regarding the application on heritage grounds.
- We consider that the application does not meet the requirements of the NPPF, in particular paragraph numbers 194, 196 and 200.
- In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.
- Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If, however, you propose to determine the application in its current form, please treat this as a letter of objection, inform us of the date of the committee and send us a copy of your report at the earliest opportunity.



CDA Capacity

Appropriate Heights



Capacity Summary

Area 5	Site Status	No. Homes at Min. Density	No. Homes at Max. Density	Avg. No. Homes
Railway Station	Planning Applications		0	
	Known	0	0	0
New Walk	Planning Applications		842	
	Known	67	93	80
University of Leicester	Planning Applications		480	
	Known	0	0	0
Overall Total Units (Known Sites)		34	60	80
Total Planning Applications			1322	
Total Known Sites (Average)			80	
Total Capacity (avg. + planning apps)			1402	

Capacity for Change*

Railway Station	35.3%
New Walk	6.4%
University of Leicester	17.2%

* Non resi allocation for Railways Station neighbourhood.

Area Five Capacity Summary

11.22 Ha
 Total Area of Known Sites and Planning Permissions.
 80 Total units
 Known Sites (based on average density).
 1322 Total units
 Planning Permissions contributing towards the local plan.

Brownfield vs Green Space

- City has limited availability of deliverable brownfield and green space compared to other cities
- Over 3,500 reps
- Huge objections to loss of green space
- City is promoting majority of sites as landowner- including 3 of the 5 strategic sites



Challenging sites: former sports fields, local amenity spaces, former allotments



Robust Testing/Challenge

- L&L Independent PAS assessment – we have responded to all recommendations
- Reg 18 Consultation:
 - Many objections,
 - vast majority around loss of green space
 - very little dispute over Unmet Need
- Charnwood EIP:
 - Substantial scrutiny
 - 20 objectors, 3 KC's - almost no challenge to City Unmet Need
 - Inspectors support SoCG and Unmet Need Evidence
- City Publication of Reg 19 Plan and Evidence base now published for further testing and scrutiny

Conclusions

- City has striven to minimise unmet need
- NPPF/Duty to Co-operate remains in place
- SGP secures control/provides framework for Local plans
- Important City figure is realistic and deliverable- in all our interests
- Duty to Co-operate/Statement of Common Ground critical vehicle for formal agreement of numbers: supported by Inspectorate
- Ability to review as other Local plans are progressed
- Failure to agree SoCG by any partner threatens City and all other Local Plans substantially
- A failed City Plan will compromise progression of Local Plans across the whole of Leicestershire

Housing Crisis



- City is as keen as anyone to deliver
- Planning the right homes to meet all the **evidenced** needs at all scales of development
- Housing is desperately needed in the City and across County

Questions?
