Leicester City Local Plan/Unmet Need





Grant Butterworth Head of Planning Leicester city Council December 2022

Outline

News

By DAN MARTIN

inted mended.

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

A 'planned destruction' model to become for the right of Diverse and council bases of they now may end out the they this many of them could be bud. THOUSANDS of new homes will be Constitute built. Constitute the segmentation of the segmentation will underpin their efforts to find the where this can happen? The list of sites has been narrowed down from 240 that were suggested by the emanual itself and private

MAYOR SAYS DRAFT PLAN FOR HOUSING SEEKS TO RETAIN CONTROL, BUT CRITICS SAY 'PRECIOUS' OPEN SPACES WILL BE LOST FOREVER

landstwiners two years ago. They range from larger strategic preentield areas, with enough space to take hundreds of homes, to much smaller patches for potential development, where a handful of houses could be built.

included in the list are former tions of school playing fields.

admitted finding sites for the new has become a trm proposal. ing how the city grows up to 2036 - targets, 1.712 new hornes will be inwead by the council. will be cuntinversial.

One critic, opposition councilior 2006 - a intal ni 29,104. Night Portor has called the Around 10,000 of these aready over 60 per cert of them will be want to work and than means an fields within the city and beyond all current draft 's planned destruct have planning parmission and are brownlichd but there will be grass, enormous pressure on land where don't ware either. tion" of the city's green spaces, but being built as time progresses. Sur Pener has insided that the cannol Planners say a lack of available "People do ask why there are unicoprises and find jobs. carmarking carefully considered land within the cay boundaries howofield sites - for example in that a totant counter meeting, not shes for development will serve to mean neighbouring districts will be Fing Island which havin't later. Councillor Parter, the Ulteral Denno protect those open spaces that required to find-room for about a developed. remain. third of the remaining total.

The mayor has stressed this is the But the city council's director of constrained" 'start of a conversation' about how plauning Grant Butterworth and: Sir Peter add: "The significant adisappointmentities, the cits grows, which will focus on "We think we can get to just over" word in draft local plan is 'draft'. other key tours issues such as inans- 21,000 because a substantial churic. "The draft is for public consultapoet and retail and tackling the climation of the is existing permositions make emailingency.

Last week, city chuncillars yousl small site allocation and delivery in the months shead. in start that process with a 12 week the city centre. public consultation, starting next month

There sell be a further consulta- district,

imbacinal plats, play areas, parks, tion at the end of the year follower "The districts understand this and, tunity for objections before the plan, are going they are pone forces: former allotments and even por- by an "maminum in public" by have been working closely with us" in finalisad.

drain local plan - a straingy for shap- As it stands, to meet government. 74 smaller poils - 58 of which are here. needed in the city each year up to Mr Burnerworth said. We are very enormous pressure on housing, what we get is inclusioned unreparm to pursue brownfield aloss fire. "It's also a place where people lated housing development or good field sites used.

We have strategic sites to use, a dialogue with the people of the rity over herasite's precious greenfield moving away.

"That will have us a shortfall of unit. We intend to lister to what you local plan. around 8,000 which will go to the pleasy."

He warmed of furture arban sporel. governmenta planning importors. Within the rity about 4,000 hours. He added: "The fact is this city is. He added: Future generations Ore merent Str Peter Souldwises more war when the draft local plan are so by built in the city centre 2000 very, very attractive. People want to will not thank us. We should there im larger strategie sites and 1,500 cm. Eve here and make their futures these out?

However Sr Peter hit back, up-"Of source that is leading to an ing:"If we don't provide the housing

they can do diat and sat up new "This framework says where it it acceptable (to build) and where his

"There is a list of stars where i can opposition councillor, such "We might be putsible to make process?" The answer is that they are hagely have been writing years for this dust, that prevents to plasmad develop local plan to cume forward and what ment.

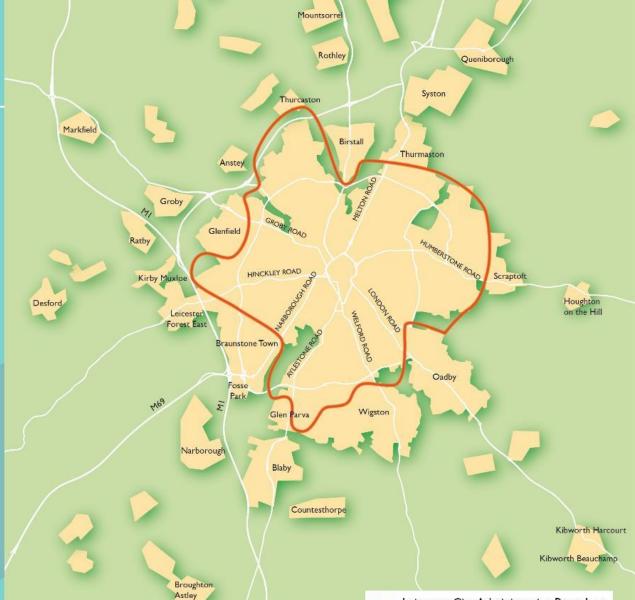
"I want to store alphantes 1" If the habour council denks the destruction by developen who as sustainable way to tackle climate only interested in making a cultinon and we intend to engage in a change is to buildoza and concrete burk. Planing should border up and

she, then what hope is thereit "This plan is a constituted of "It is by no means a finished prod- "God help us if we pursue this destruction and the lass of peen space in the city.

"There's no ambition and drive in "It will not be easy because we are He said there would be an onnor . It's to and "Donadown and a second and a straight donates by

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



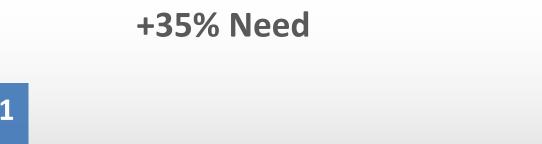
Regulation 18 Draft Plan 2020

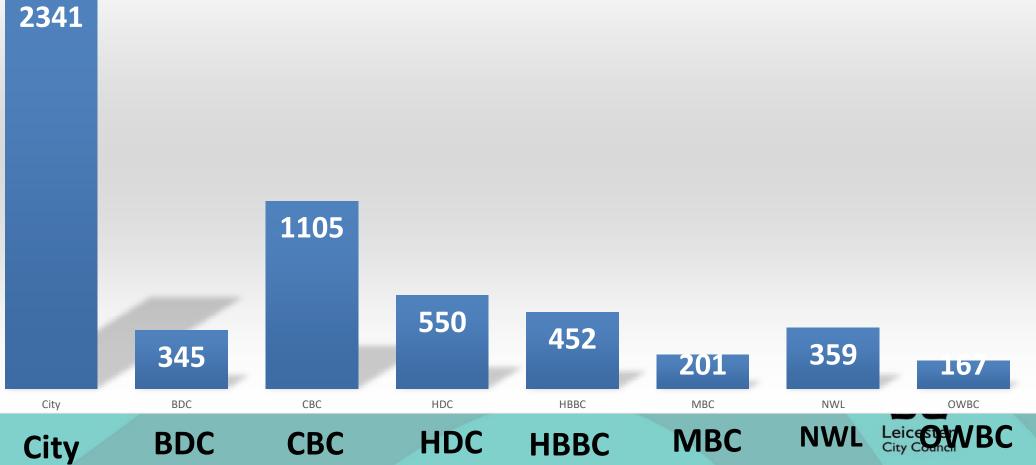


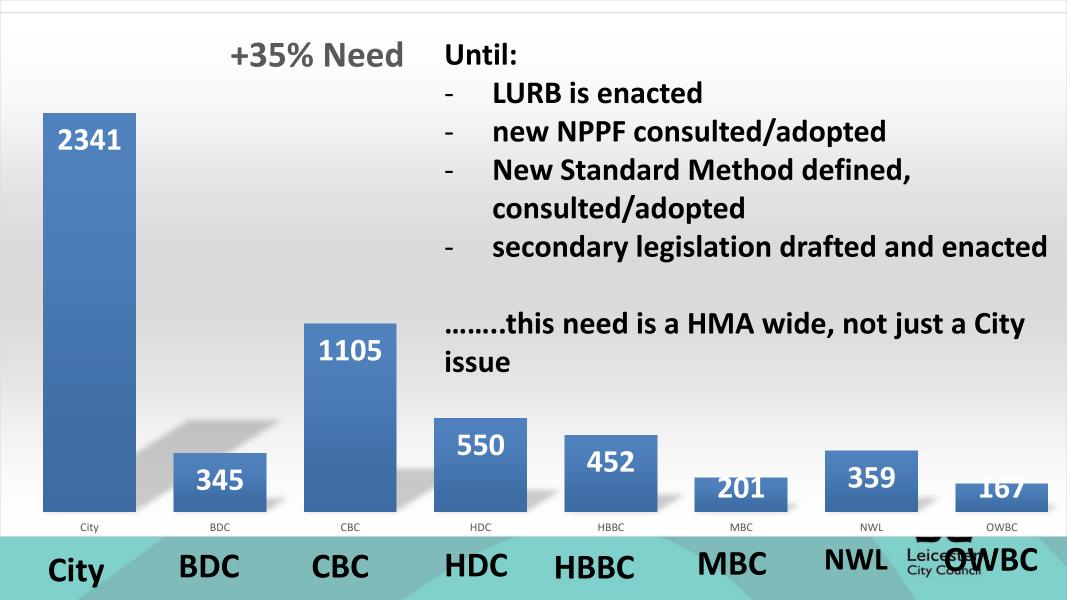
	Component	Dwellings		
Α	Housing Need 2019-36 (Standard Method 2019)	29,104 (1,712 dwellings per annum)		
	Commitments			
В.	Commitments major developments detailed permissions and outlines	9,827		
D.	Saved previous Local Plan allocations	0		
E.	Reserved matters applications with a resolu- tion to grant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

Robustly tested Target 1,712 pa 7,742 unmet









Context: Local Position

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

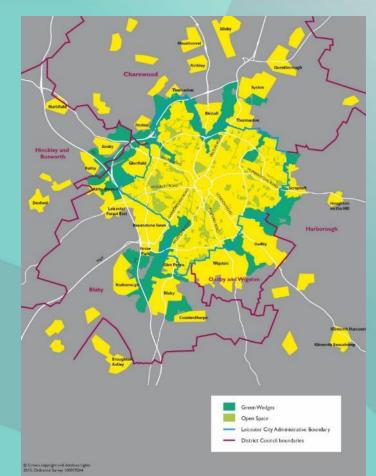




Planning Balance/Impossible choices

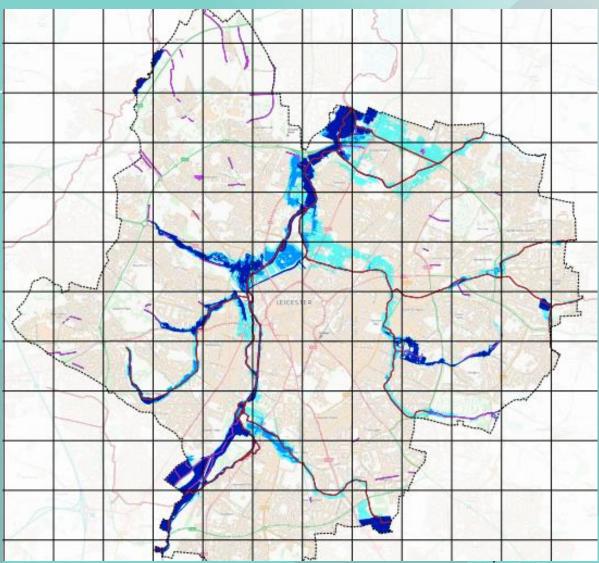
Not just Housing need

- 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.....



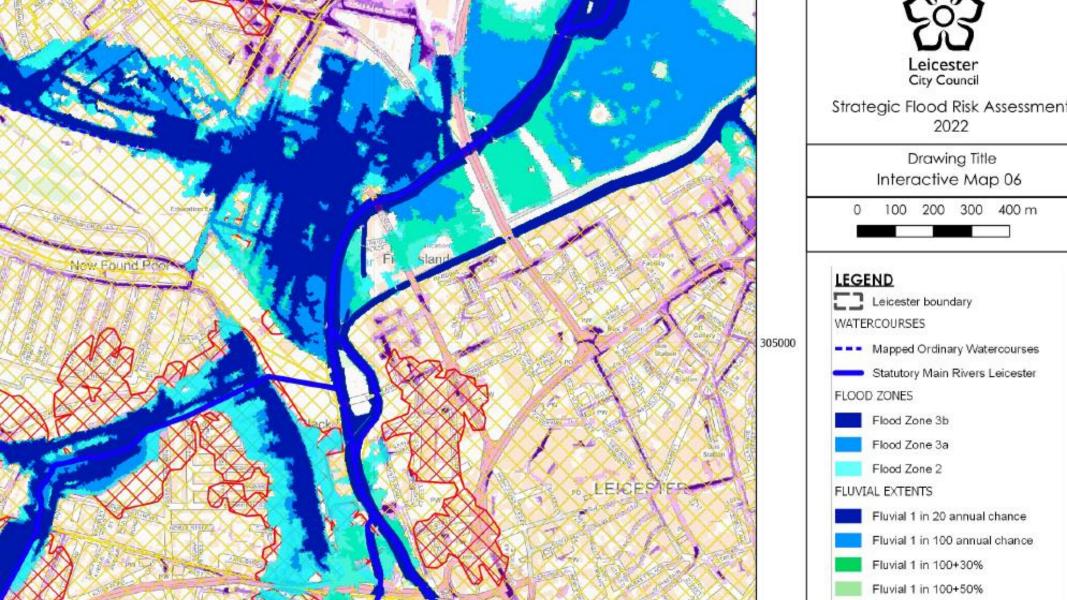
Constraints

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

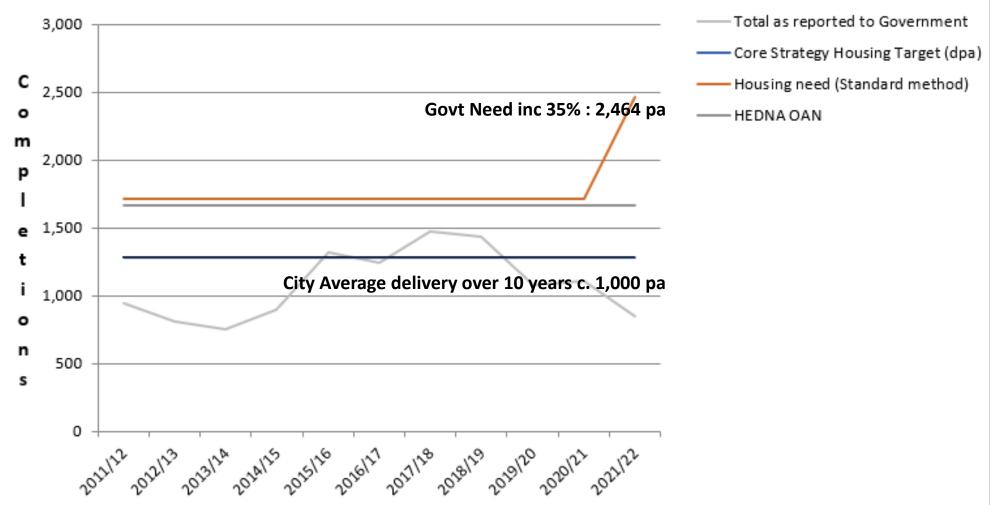




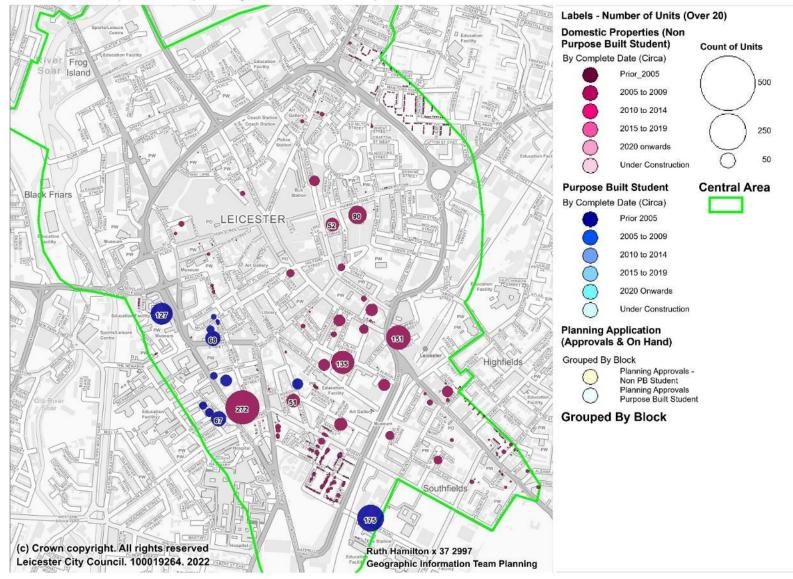




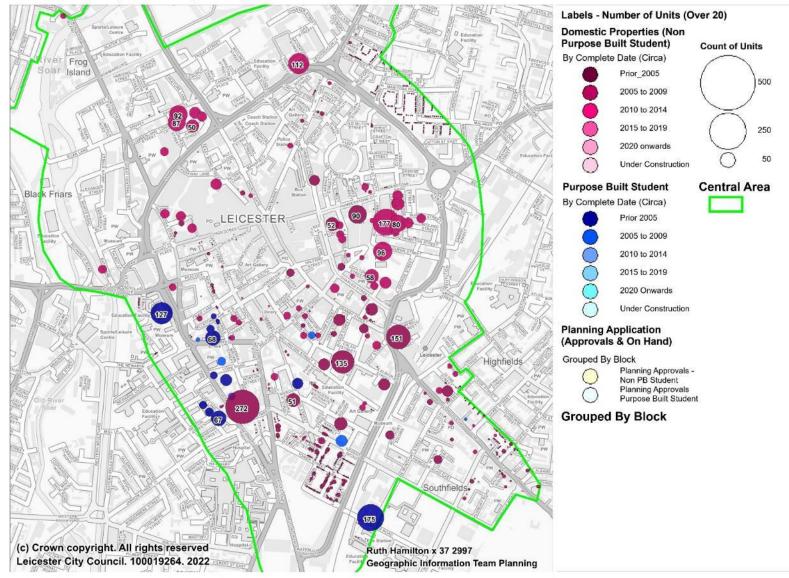
Housing completions since 2011



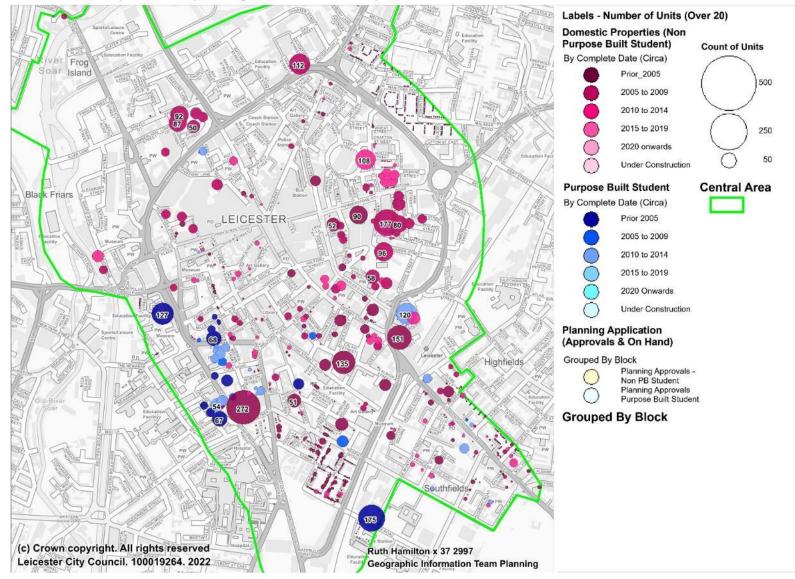




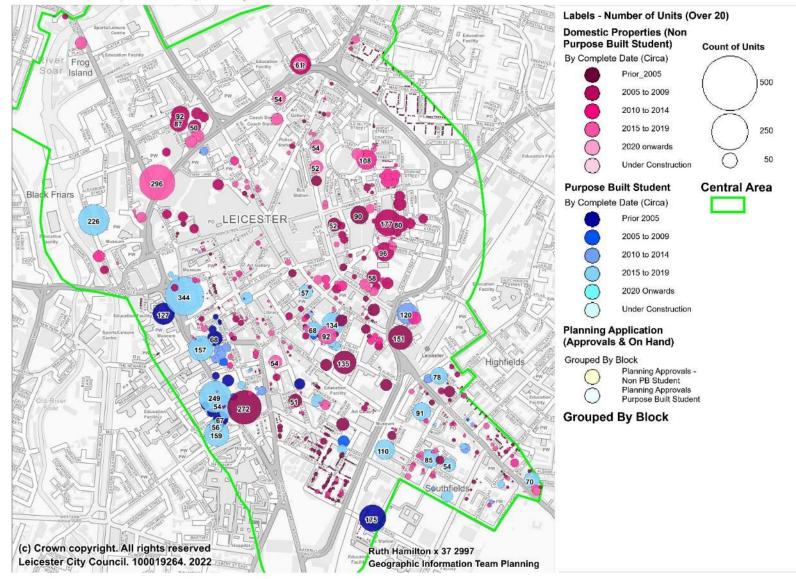




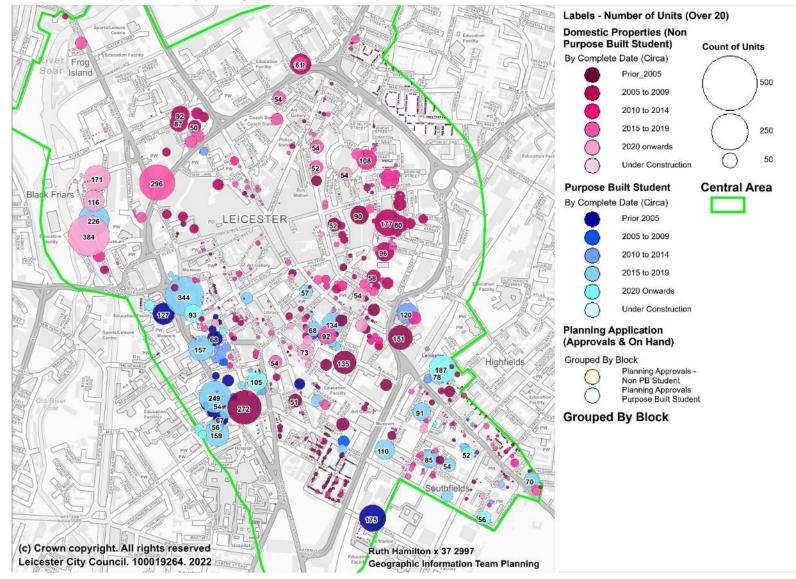






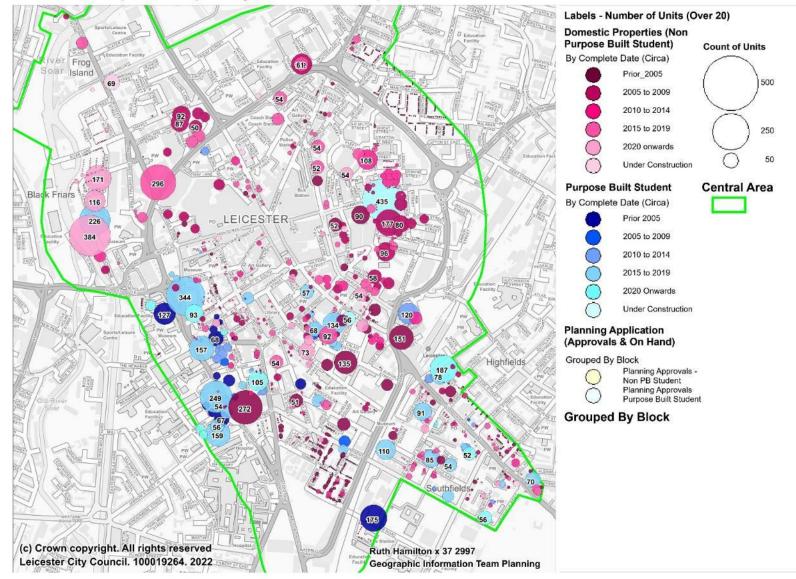








Residential Developments Completed By Year - Central Area Up to 2022 and Under Construction





Labels - Number of Units (Over 20) Sports/Leisure **Domestic Properties (Non** 7 Educal 1,143 Purpose Built Student) **Count of Units** 88 nn Facilit By Complete Date (Circa) Frog 612 Island Prior 2005 500 69 2005 to 2009 54 42 2010 to 2014 92 87 50 2015 to 2019 250 問 220 351 2020 onwards 267 45 Educatio 50 Under Construction 100 98 1721 296 **Purpose Built Student Central Area** Black Friars 305 116 By Complete Date (Circa) LEICESTER Prior 2005 226 52 177 80 2005 to 2009 384 2010 to 2014 2015 to 2019 123 2020 Onwards **Under Construction** 127 **Planning Application** (Approvals & On Hand) 157 Grouped By Block Highfields 135 187 Planning Approvals -Non PB Student 78 **Planning Approvals** 249 54# Purpose Built Student 351 106 272 **Grouped By Block** 56 47 159 110 Southfields. 175 (c) Crown copyright. All rights reserved Ruth Hamilton x 37 2997 Leicester City Council. 100019264. 2022 **Geographic Information Team Planning**

Leicester

City Council

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

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:
- <u>leicester-city-council-</u> <u>shelaa-november-</u> <u>2022.pdf</u>

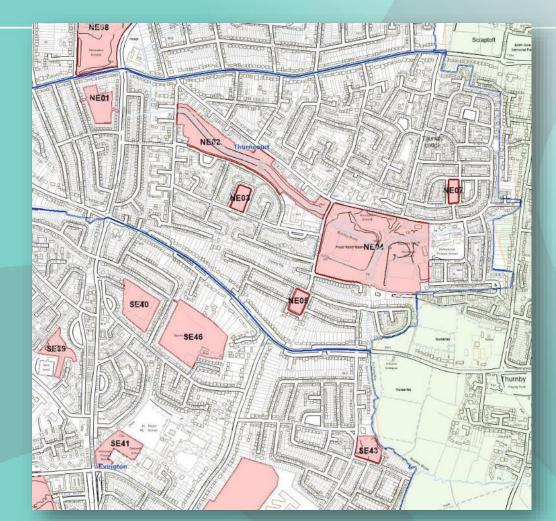
Strategic Housing & Economic Land Availability Assessment September 2022 Appendix A: List of achievable SHELAA sites

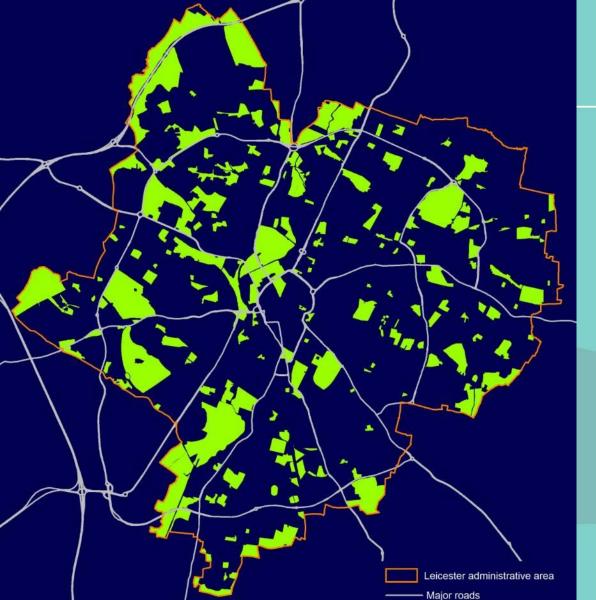
Site Number	Site name	Hectares	Brownfield/ Greenfield	Timeframe	Estimated Dwellings	Deliverable	Developable	Suitable	Available	Achievable
015	Land to south of St Augustine Road/west of Duns Lane	2.02	Brownfield	6-10 Years	63	No	Yes	Yes	Yes	Yes
031	241 Loughborough Road - Rear of Bestway	2.90	Brownfield	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





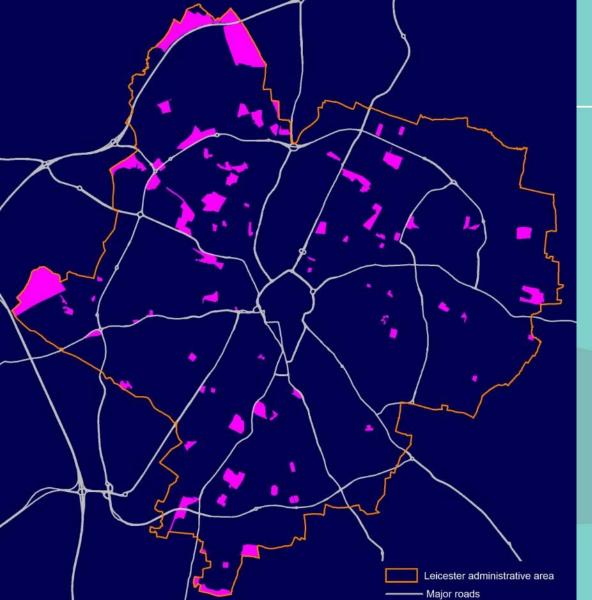
Local Plan: Initial Emerging Options Consultation

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 Sitesunconstrained sites very scarce
- Majority of sites are council promoted

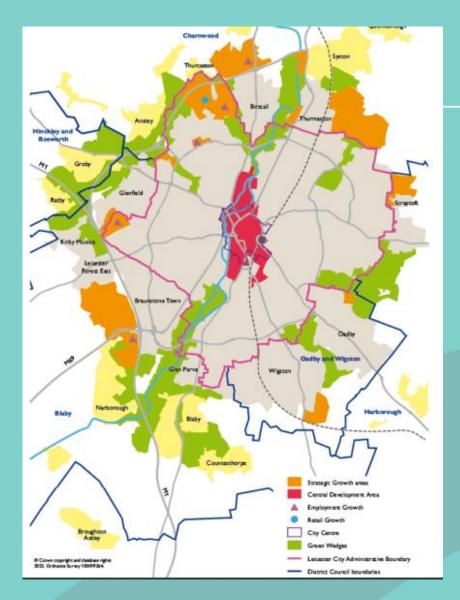


Work Undertaken by City Council Since Regulation 18: Local Plan and Evidence now published 24th November 22

- 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)		
В.	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)		
н.	Allocations identified in the draft plan	1,230		
J.	Central Development Area capacity work	6,286		
к.	Strategic sites	1,838		
L.	Total anticipated supply within the city	21,118		
м.	Overall supply (anticipated supply + completions) – D + L	21,118 + 1,892 = 23,010		
N.	Local Plan Housing Target (2020-36) 20,730 (Approximate 11% buffer)			
0.	Unmet need	18,694		
	lumbers have been rounded up	I		

Local Plan: Reg 19 Submission Consultation

• Plan and Evidence base-

https://consultations.leicester.gov.uk/planning/local-plandocuments/consultation/subpage.2022-11-03.2107435895/

- Includes:
 - SHELAA
 - CDA Capacity Study
 - Sites Assessment and selection documents
 - Full suite of evidence



Note: Numbers have been rounded up

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.'

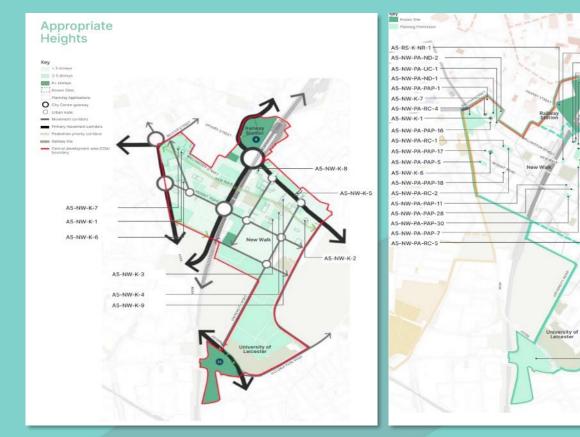
Recommendation

- 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



Capacity Summary

A5-NW-PA-PAP-6

A5-NW-PA-PAP-19

A5-NW-PA-RC-2

A5-NW-PA-UC-2

A5-NW-PA-PAP-2

- A5-NW-PA-RC-3

A5-NW-PA-PAP-20

A5-NW-PA-PAP-21

A5-NW-PA-PAP-12

A5-NW-PA-PAP-13

A5-NW-PA-PAP-3

A5-NW-PA-PAP-26

A5-NW-PA-PA-14

A5-NW-PA-PAP-8

A5-NW-PA-PAP-9

A5-NW-PA-PAP-10

A5-NW-PA-PAP-15 A5-NW-PA-PAP-24

- A5-NW-PA-UC-4 A5-NW-PA-PAP-23

A5-NW-PA-PAP-29

A5-NW-PA-PAP-27

A5-UL-PA-RC-1

Area Five -Sites Plan

A5-NW-K-9

A5-NW-K-4 A5-NW-PA-PAP-22 A5-NW-K-3

A5-NW-K-2

- A5-NW-K-5

A5-NW-K-8

Deal of a

85	Site Status	No. Homes at Min. Density	No. Homes at Max. Density	Avg. No. Homes		
way Station	Planning Applications	0				
	Known	0	0	0		
v Walk	Planning Applications		842			
	Known	67	93	80		
versity of	Planning Applications	480				
ester	Known	0	0			
rall Total Units (R	Known Sites)	34	60	80		
al Planning Applic	cations	1322				
al Known Sites (A	werage)	80				
al Known Sites (A al Capcity (avg. +				80		

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

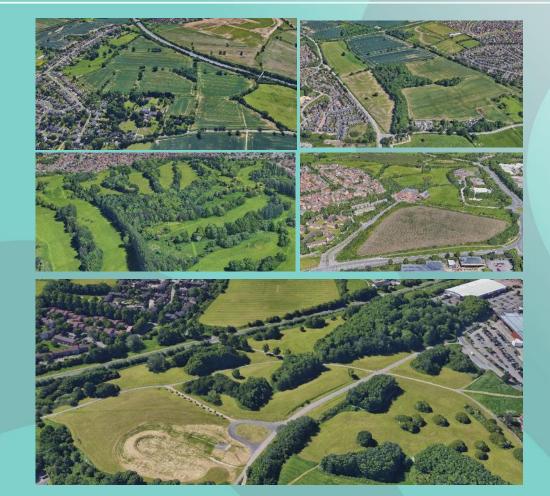
11.22 Ha Total Area of Known Sites and Planning Permissions.

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 <u>realistic and deliverable-</u> in all our interests
- Duty to Co-operate/Statement of Common Ground critical vehicle for formal agreement of numbers: <u>supported by Inspectorate</u>
- 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 <u>evidenced</u> needs at all scales of development
- Housing is desperately needed in the City and across County



Questions?

