



# **LOCAL PLAN – PARTIAL REVIEW**

## **SUBMISSION**

### **Topic Paper**

**February 2020**

## **1.0 INTRODUCTION**

- 1.1 The North West Leicestershire Local Plan was adopted on 21 November 2017 (LP/04). It sets out a strategy for delivering the homes, jobs and infrastructure needed in the district between 2011 and 2031. Policy S1 included a requirement to start a review of the plan within three months of the date of adoption. Policy S1 set out that the review was to be submitted within 2-years from the commencement of the review, otherwise the plan, on the face of Policy S1, would be deemed to be out-of-date. This would have serious implications for plan-led development management decision-taking.
- 1.2 This was a Main Modification recommended by the Local Plan Inspector at the Examination which took place in early 2017.
- 1.3 This paper:
- outlines the reasons as to why an immediate review was required;
  - what has happened since the Local Plan was adopted and why the Council has decided that the review should be split in to two; a Partial Review which proposes changes to Policy S1 and a Substantive Review which will roll forward the plan to 2039, including the allocation of new developments and reviewing other policies as necessary; and
  - outlines how the Council, working with the other Leicester and Leicestershire authorities, proposes to address the future planning of the district.

## **2.0 WHY WAS AN IMMEDIATE REVIEW REQUIRED?**

- 2.1 There are two main reasons why an immediate review was required:
- A shortage of employment land up to 2031 compared to what was needed (as identified in the Leicester and Leicestershire Housing and Economic Development Needs Assessment, or HEDNA)
  - The possible need to accommodate additional housing arising from unmet needs in Leicester city.

## **3.0 WHAT HAS HAPPENED SINCE THE LOCAL PLAN WAS ADOPTED?**

- 3.1 Work on the review commenced in February 2018, consistent with Policy S1, with an Issues consultation. At that point in time it was the Council's intention to undertake the review within the timescales specified in Policy S1. Indeed, the report to the Council's Local Plan Advisory Committee of 31 January 2018 (CR/08) which outlined the proposed approach to the review, was aiming for submission in the autumn of 2019. This was partly predicated on the previous statements from Leicester City Council regarding the timetable for the production of the next Leicester City Local Plan.
- 3.2 It was intended that it would not be a wholesale review, but would have a specific focus on those housing and employment issues outlined above. However, rather than just addressing these issues up to 2031 to coincide with the plan period of the adopted Local Plan it was intended to roll forward the plan period to at least 2036.

- 3.3 By the spring of 2019 there had been a number of changes in circumstances which meant that this was no longer an appropriate course of action to follow. Therefore, the Council's Cabinet of 16 July 2019 (CR/01) agreed, instead, to pursue a Partial Review which amends Policy S1. The Cabinet also committed to continue with a wider review of the Local Plan than had originally been intended (referred to as the Substantive Review).

#### **4.0 WHY DID THE COUNCIL DECIDE TO DO A PARTIAL REVIEW?**

- 4.1 As noted above, by the spring of 2019 there had been a number of changes in circumstances from that which existed when the plan was adopted in November 2017. It is important to understand these changes and the context within which the Local Plan review was being undertaken and which, ultimately lead the Council to conclude that it had no choice but to amend Policy S1 through a Partial Review if the Local Plan was to continue to be considered up-to-date for Development Management purposes.
- 4.2 The starting point is to consider the two principal reasons for the review and what has occurred in the in the intervening period since adoption of the Local Plan in November 2017.

#### **Shortfall in provision of employment land**

- 4.3 The adopted Local Plan states in Paragraph 8.16 that, as at the 1 October 2016, there was a residual requirement of 39ha of employment land (comprising B1, B2 and small scale B8 but excluding strategic B8 of over 9000sqm). This was broken down as follows:

Table 1 – employment land position as at 1 October 2016

Requirement 2011-31	66ha	A
Starts 2011-16	6.81ha	B
Commitments	29.86ha	C
Residual requirement (A-B-C)	- 29.33ha	D
Allowance for loss of existing emp land	10ha	E
Residual requirement (D-E)	- 39ha	

- 4.4 The Local Plan then allocated a site at Money Hill (under Policy Ec2) for up to 16ha of employment development. This brought the residual requirement (including the allowance for the loss of existing employment land) down to 23ha.
- 4.5 Since 1 October 2016, the Council has granted a significant number of permissions for B1, B2 and small scale B8 uses which means that as at 1 October 2019, the situation is as set out in Table 2 on the next page:

Table 2 - employment land position as at 1 October 2019

Requirement 2011-31	66ha	A
Starts 2011-19	21.2ha	B
Commitments	35.6ha	C
Allocation (Money Hill) @ 16ha	16ha	D
Residual requirement (A-B-C-D)	+6.8ha	E
Allowance for loss of existing emp land	10ha	F
Residual requirement (E-F)	-3.2ha	

- 4.6 Therefore, the residual requirement as at October 2019 was down to 3.2ha. However since then the Council has resolved to grant permission on a 5.39ha site at Heather Brickworks, subject to a s106 agreement being signed. This effectively meets the outstanding residual requirement, and reflects the positive approach taken by the Council to support sites coming forward. Furthermore, a number of other planning applications are currently under consideration which could result in additional provision. There is therefore no longer any need to allocate further such sites in a plan review covering the period to 2031.

#### Strategic B8 uses

- 4.7 There is no specific requirement in the adopted Local Plan for the provision of strategic B8 uses (units of 9,000sqm or more), not least because the Leicester and Leicestershire Strategic Distribution Study only identified any requirements for the area as a whole, it did not assign any specific requirements to individual districts/boroughs. Notwithstanding this, Policy Ec1 identifies two sites that had permission at the time (former Lounge Disposal site, Ashby and land at Sawley Crossroads, Sawley) in addition to the Strategic Rail Freight Interchange north of East Midlands Airport/west of M1 J24.
- 4.8 Since the Local Plan was drafted, there has been significant additional provision both granted permission and constructed. This is summarised below (correct at 1 October 2019):

Table 3 – provision of strategic B8 employment land in North West Leicestershire, 1 October 2019

Strategic B8 Completions April 2011- October 2019	105.3
Strategic B8 Under construction at 1 October 2019	149.2*
Strategic B8 With permission at 1 October 2019	62.5

\*Includes 139ha at East Midlands Gateway (treated as one site)

- 4.9 In addition, since 1 October 2019 permission has been granted for a 97ha distribution campus at J11 of the M/A42 (18/01443/FULM).

#### Unmet housing needs

- 4.10 The issue of unmet housing need in Leicester City was raised by the City Council in a letter of 13 February 2017 as part of the Examination of the Local Plan (attached at Appendix 1 of this paper). In the letter, it was confirmed that the City Council would

have an unmet need compared to the requirements in the HEDNA but that it was *“unable to provide a definitive figure for the shortfall in the city”*.

- 4.11 The letter from the City Council set out some background information in respect of recent housing delivery and supply (at that time) in the city. An indicative shortfall of 8,834 dwellings based on a draft SHLAA was noted, but was not confirmed as being the unmet need. It also confirmed that:

*“The City Council intend to consult on the next stage of the new local plan later this year. This will include consultation on a wide range of sites. Following this the City Council will work towards a draft plan which is due to be published in spring 2018. Submission of the plan will follow in early 2019.”*

- 4.12 The Local Plan Inspector was aware of the timetable for the next Leicester Local Plan when making his recommendation regarding the wording of Policy S1, and in particular the timescale for the review to be undertaken. Based on the timetable outlined in the City Council's letter of 13 February 2017 a two-year period for submission of the review was not unreasonable.
- 4.13 However, by the spring of 2019 Leicester City had not been able to confirm the quantity of its unmet housing need and its Local Plan was not now expected until later in 2019.
- 4.14 This lack of progress with the Leicester Local Plan was a major hindrance to progress being made on the NWL Local Plan review, not least because there was no clarification as to the level of unmet housing need. How could the District Council plan with any confidence for a level of unknown need? Planning for a figure that was too high or too low would be abortive work. Conversely, if progress was not made the Local Plan was at risk of being considered out-of-date as a result of the wording of Policy S1.
- 4.15 Faced with this dilemma, the most reasonable course of action open to the District Council appeared to be to do a Partial Review amending Policy S1 only, whilst also in parallel working on a wider Substantive Review. This was the decision made by Cabinet at its meeting on 16 July 2019 (CR/01).
- 4.16 Since the District Council commenced the Reg 19 consultation, the City Council's Overview Select Committee of 28 November 2019 received a presentation in respect of the draft Leicester Local Plan which identified a shortfall of 7,742 dwellings. This shortfall is marginally less than that identified in the letter of 13 February 2017.
- 4.17 An extract from the minutes of the Leicester City Overview Select Committee is attached at Appendix 2 of this paper.
- 4.18 The draft Leicester Plan has yet to be agreed by the City Council. It is understood that it is being considered by a special Council meeting of 19 February 2020. This is a month later than set out in the presentation to the Overview Select Committee. It will then be subject to consultation with submission version to be consulted upon in *“Summer 2020”*.
- 4.19 It is understood that the City Council will not be in a position to confirm a final unmet need figure until it has agreed the Submission version later on in 2020. This may be

because some proposed sites prove controversial or raise questions about deliverability or because the level of Leicester's need increases, for example when the affordability ratio figures are updated in March 2020. Furthermore, the City Council has now identified that it has an unmet employment need amounting to about 23ha. Once the City Council has confirmed its unmet needs, the other LPA in the HMA will be able to move relatively quickly to build on the existing work under the Duty to Cooperate to agree the distribution of the unmet need. At that point NWL will be in a position to take this into account in the Substantive Review of its Local Plan.

**Conclusions on need for review**

- 4.20 As set out in paragraph 2.1 there are two main reasons why an immediate review was required:
- A shortage of employment land up to 2031 compared to what was needed (as identified in the Leicester and Leicestershire Housing and Economic Development Needs Assessment, or HEDNA)
  - The possible need to accommodate additional housing arising from unmet needs in Leicester city.
- 4.21 In respect of both of these there has been a significant change in circumstances since the wording of Policy S1 was agreed as part of the Local Plan Examination in 2017.
- 4.22 The issue of unmet employment need identified at the time of the local Plan Examination has been substantially addressed through the grant of a number of planning permissions in the intervening period.
- 4.23 The identification of unmet housing and employment need from Leicester City is not within the District Council's gift to either require Leicester City to do and nor can it identify the level of unmet need itself. The District Council, and indeed all of the Leicestershire authorities, have sought to encourage Leicester City to establish its unmet needs as soon as possible. For whatever reason, clarity on this has only been received since the publication of the Reg 19 consultation. There has been, and remains, a willingness amongst all of the Leicestershire authorities to work together to address this matter. This is addressed in paragraphs 5.2-5.7 of this paper.

**Other factors creating uncertainty**

- 4.24 In addition to the change in circumstances in connection with the factors which required an immediate review, there are also other factors which have resulted in uncertainty which led the Council to conclude that undertaking both a Partial Review and a Substantive Review was the only sensible and sound way to proceed. In particular there has been significant uncertainty regarding the quantification of future housing requirements
- 4.25 At the time the Local Plan was being finalised it was envisaged that the housing requirements for a review would be based upon the HEDNA. This identified an Objectively Assessed Need for north West Leicestershire of 481 dwellings to 2031 (the figure used in the adopted Local Plan) and 448 dwellings for the period to 2036.
- 4.26 Had the HEDNA continued to provide the basis for establishing housing requirements then the District Council would have been able to plan with a significant degree of

confidence. However, this has not been the case as at national level the government has introduced the 'standard method' for establishing local housing needs in future plan-making. Whilst the standard method was intended to provide a greater degree of certainty and to help speed up the Local Plan Examination process, subsequent government statements and, particularly its concerns regarding the reliability of the 2016-based household projections, resulted in more, not less, uncertainty.

- 4.27 Appendix 3 of this paper sets out the timeline and commentary for the Local Plan review to date, the progress of national policy in respect of the issue of identification of housing requirements and the potential district housing requirements at various points in time.
- 4.28 The uncertainty regarding the standard method and which household projections are to be used to provide the basis for a calculation of the local housing need was only finally resolved in February 2019. This is particularly important in the context of North West Leicestershire where the outcome from the 2014-based household projections (379 dwellings using 2019 affordability ratio) compared to the 2016-based projections (529 dwellings) is so different. This was not unique to North West Leicestershire as a number, albeit the vast minority, of other authorities were also in the same position. However, the severity of the difference between the two household projections and hence the outcome from the application of the standard method, was significantly greater in North West Leicestershire. It was partly for this reason that the Council's response to the Government's Technical consultation on updates to national planning policy and guidance in October 2018 suggested that *"it should also be made clear that where the 2016-based data identifies a higher housing need than the 2014-based projections that this should, notwithstanding the general advice, be used to inform the local housing need"*. The Government did not make such provision in national policy or guidance; instead, it chose to rely upon the 2014-based household projections.
- 4.29 If the Council had decided to use the requirement of 379 dwellings as the basis for the review and having regard to the Council's published housing trajectory for April 2019 along with projections for post 2031 up to 2039, there would be a surplus of about 1,500 dwellings. Appendix 4 sets out this calculation.
- 4.30 Furthermore, since 2014 the annual housing completions have exceeded the annual requirement by a very significant margin. As a result, by April 2019 some 4,757 dwellings had been built since the start of the plan period of the adopted Local Plan (2011), compared to the requirement of 3,848; an excess of about 900 dwellings or 23%. The authority monitoring report (LP/13) provides more information about this. The Council has also satisfied the government's Housing Delivery Test, with the latest results published on 13 February 2019 recording a measurement of 269% for North West Leicestershire.
- 4.31 What this clearly demonstrates is that North West Leicestershire is meeting its local housing need and is also well placed to do so for the foreseeable future.
- 4.32 However, the Council recognises that it is under an obligation to meet not only its own needs, but also to help meet need across the Leicester and Leicestershire Housing Market Area where there is an unmet need.
- 4.33 Whether the Local Plan covered the period to 2031 or 2036 (as proposed at the outset of the review), the lack of absolute clarity about how the requirement was to

be established coupled with the with the lack of any certainty about the level of unmet needs from Leicester City has created a 'perfect storm' of uncertainty.

## **5.0 FUTURE PLANNING OF NORTH WEST LEICESTERSHIRE**

- 5.1 The Partial Review represents a necessary step to ensure that the adopted Local Plan is not deemed to be -out-of-date for decision making in the short to medium term. However, the District Council is committed to planning the long-term future of North West Leicestershire as well. To do this, the issue of unmet needs from Leicester City and its redistribution has to be resolved. This is explored below, along with an outline of work to date and planned in respect of the Substantive Review.

### **Redistribution of unmet need from Leicester City**

- 5.2 As set out in the Statement of Common Ground (LP/08) there are well established mechanisms in place for joint working across Leicester and Leicestershire. There is also demonstrable evidence over a significant period of time of successful joint working, including the HEDNA and the preparation of a Strategic Growth Plan. This is a non-statutory plan which provides a framework for future Local Plans.
- 5.3 In June 2019 the Strategic Planning Group set-up a Task and Finish Group to progress the technical work needed to underpin a Statement of Common Ground. At the time, it was envisaged that Leicester City would be publishing a Draft Local Plan in autumn 2019 which identified an unmet housing need. It is now envisaged that consultation on Leicester's Draft Local Plan will commence in March 2020.
- 5.4 Notwithstanding the fact that Leicester City did not quantify its unmet housing need until November 2019, the authorities established a Task and Finish Group under the auspices of the Strategic Planning Group in June 2019.
- 5.5 The Task and Finish Group comprises a representative from each authority under the leadership of the Joint Strategic Planning Manager. The work to date has concentrated upon agreeing a standard approach for identifying the current housing supply and developing a range of spatial options for how unmet needs could be accommodated. Now that more clarity is starting to emerge regarding the scale of unmet needs, the Planning Advisory Service is being commissioned to advise on the robustness of the evidence provided by Leicester City. In addition, the spatial options will be refined and tested through a Sustainability Appraisal so as to inform a decision on the redistribution.
- 5.6 When this work has been completed to the satisfaction of the Task and Finish Group, the intention is for a Statement of Common Ground (SoCG) to be presented to the Member Advisory Group (MAG). As outlined in the SoCG prepared to support the Partial Review, the MAG comprises of a councillor from each of the authorities, plus an observer from the Leicester and Leicestershire Enterprise Partnership (LLEP). The MAG will be asked to consider this redistribution and thereafter, each authority will take the proposals through their own governance process for agreement.
- 5.7 The SoCG will be required to support the Reg 19 versions of both the Leicester City Local Plan and the Charnwood Local Plan. These are due to be published later in 2020. This will drive the timetable for the SoCG and ensure that it is completed as swiftly as possible



## **The Substantive Review**

- 5.8 The Substantive Review is being over seen by the Council's Local Plan Committee (a cross party group of Members). This meets about every two months. It has considered a number of reports since the Local Plan review commenced in February 2018. There are a number of matters which the Committee has agreed, including:
- The next plan period will be to 2039;
  - The inclusion of a policy (or policies) in respect of Self and Custom Build housing;
  - The inclusion of a local connection test to support development in smaller settlements;
  - A flexibility allowance equivalent to 15% of the housing requirement; and
  - An interim housing requirement of 480 dwellings per annum until such time as unmet need from Leicester City and its redistribution is known together with any national policy consequences of the forthcoming publication of the 2018 household projections for any revision to the standard method
- 5.9 The latter bullet point demonstrates positive planning by the Council following the clarification from the government regarding the household projections, as it is 100 dwellings per annum (or about 27%) higher than the requirement arising from the standard method. Similarly agreeing a flexibility allowance over and above the housing requirement, whatever this may be, demonstrates the Council's commitment to ensure that it meets the future needs of North West Leicestershire through making positive provision as part of the Local Plan.
- 5.10 The evidence base to support the Substantive Review is being developed. To date the following have been completed:
- Review of existing employment sites;
  - Retail and Leisure Capacity study;
  - Area of separation Study;
  - Local Housing Needs Assessment
- 5.11 In addition, the following pieces of work are in the process of being prepared:
- Employment Land requirements study;
  - Housing types and sizes study;
  - Strategic B8 study (HMA wide);
  - Options for spatial distribution;
  - Landscape study to inform decisions on the suitability of potential sites;
  - Assessment of potential development sites; and
  - Assessment of infrastructure implications
- 5.12 The Local Development Scheme of November 2019 identifies the following programme:

<b>TIMETABLE</b>	
<b>Stage</b>	<b>Dates</b>
Emerging options/draft Plan (Regulation 18)	Summer 2020
Publication of Local Plan (Regulation 19)	Spring 2021
Submission	Autumn 2021
Examination	Winter 2021/22
Adoption	Autumn 2022

Please ask for: [REDACTED]  
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Date: 13<sup>th</sup> February 2017



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Dear Mr Newton

**Implications for Leicester City Council, of the Housing and Economic Development Needs Assessment (HEDNA).**

The Housing and Economic Development Needs Assessment (HEDNA) was approved by the Members Advisory Group on Thursday 26 January 2017. The HEDNA establishes a new objectively assessed need (OAN) for the Leicester and Leicestershire Housing Market Area (HMA), and for each local planning authority within the HMA. The HEDNA OAN replaces the OAN set out in the Strategic Housing Market Assessment (SHMA 2014).

The HEDNA establishes an OAN for the HMA of 96,580 dwellings for the period 2011-2031 (or 4,829 per year). For Leicester City over the same period the OAN is 33,840 dwellings (or 1,692 per year). Just over one third of the total OAN for the HMA arises within the city.

The HEDNA sets out a housing need significantly above that established in previous assessments of housing need, including the SHMA 2014 and in previous local, sub-regional and regional plans (including the Leicester Core Strategy 2014, Regional Plan 2009 and Structure Plan 2005).

The HEDNA also sets out increased new requirements for Employment land for Leicester :-

- 115,000 sqm (6ha) required for offices
- 15ha for warehousing/distribution
- 36ha for general employment

The HEDNA has significant implications regarding the ability of the city to continue to accommodate its full objectively assessed need for housing and employment within the administrative area of the city. The city's tightly drawn boundaries and built up nature, coupled with areas of significant flood risk means that there is limited land

available for further development. Whilst the City is currently unable to provide a definitive figure for the shortfall in the city (in advance of work on the emerging local plan), the scale of the need set out in the HEDNA is of such magnitude that it is concluded that there will be an unmet need arising in the city.

We will be working to meet these needs in our new Local Plan. However we will need support and co-operation from HMA partners. The Strategic Growth Plan will be the vehicle for these conversations.

The City Council looks forward to working closely with yourselves and the other HMA partners on ensuring the full OAN for the HMA is accommodated within the HMA by ensuring emerging plans are flexible enough to respond to addressing any unmet need which may be required to be addressed within those plans.

The attached note (Appendix 1) provides further background on the emerging land supply position in the city however it should be noted that further work on the capacity of the city, including potential new land allocations, is currently being undertaken through work on the new local plan for the city.

Yours sincerely,



Head of Planning  
Leicester City Council

## Appendix 1

### Housing Completions in Leicester since 2011

The table below shows housing completions in Leicester since 2011 compared to the HEDNA OAN. The table shows that the rate of housing completions in the city falls significantly below the HEDNA OAN. There is already a shortfall of 2,917 dwellings since 2011 (around 580 per year). Completions rates in the city have been relatively constant since the mid-2000s at around 1,100 per year. It does not seem likely that the rate of completions in the city will increase significantly above that level.

Year	Completions	HEDNA 2017 (2031)	Shortfall
2011/12	977	1,692	-715
2012/13	1,147	1,692	-545
2013/14	1,126	1,692	-566
2014/15	1,162	1,692	-530
2015/16	1,131	1,692	-561
Total	5,543	8,460	2,917

Should rates of completions in the city remain at around 1,100 per year, around 22,000 dwellings could be built between 2011 and 2031. This would leave a shortfall of around 11,840 against the HEDNA OAN to 2031.

It should also be noted that student completions account for a significant proportion of completions up to 2015/16 and, in light of the HEDNA (paragraphs 9.53-9.54), the City Council are currently reviewing the way in which student completions are counted towards meeting the OAN.

### Current supply of housing land in Leicester

The City Council are in the process of finalising an updated SHLAA to represent the position as at 31<sup>st</sup> March 2016, and this is due to be published shortly. The draft figures from this were used to set out the city's total capacity figure in table 1 of the Statement of Co-operation.

The draft SHLAA currently shows a total capacity for the city up to 2031 of 25,006 (including completions since 2011, commitments, windfall and other SHLAA sites). This is a shortfall of 8,834 over the HEDNA OAN to 2031).

### Emerging Local Plan position

The City Council intend to consult on the next stage of the new local plan later this year. This will include consultation on a wide range of sites. Following this the City Council will work towards a draft plan which is due to be published in spring 2018. Submission of the plan will follow in early 2019.

Given that the city currently does not have sufficient land allocated or identified to meet the level of need set out in the HEDNA we will be seeking to allocate new sites to help meet this need.

However at this early stage in the plan process it is not possible to know how many sites will be suitable, available and viable for housing development, nor how many of those will be successfully allocated in the final adopted plan. It is therefore not possible to know with any certainty, what contribution those sites can make towards addressing the housing OAN for the city and any consequent reduction in any unmet need remaining in the city. However it is clear that even if a significant number of new sites are identified, the scale of the need set out in the HEDNA is of such magnitude that it is concluded that there will be an unmet need arising in the city.

## LEICESTER CITY COUNCIL

### Minutes of the Meeting of the OVERVIEW SELECT COMMITTEE

Held: THURSDAY, 28 NOVEMBER 2019 at 5:30 pm

#### P R E S E N T :

Councillor Cassidy (Chair)  
Councillor Halford  
Councillor Joshi  
Councillor Kitterick  
Councillor Porter  
Councillor Waddington

In Attendance:

Sir Peter Soulsby – City Mayor

#### **46. DRAFT LEICESTER LOCAL PLAN (2019 - 2036) - PUBLIC CONSULTATION**

The Director of Planning, Development and Transportation submitted a report outlining the main strategies and policies of the draft local plan for public consultation in January / February 2020.

The Team Leader (Generic Planning) introduced the report and gave a presentation on the draft local plan, (a copy of which had been circulated with the agenda papers), explaining that:

- The detail of the strategies and policies would be available for the public consultation;
- The city's boundaries were very tight, so the Council worked closely with neighbouring authorities. There also were a number of cross-boundary issues that needed to be addressed;
- Housing need had been calculated on the basis of a national methodology taking account of factors such as projected births, deaths and migration;
- Housing was a key issue for the city and neighbouring districts, particularly as it was unlikely to be possible to deliver the full extent of housing needed in the city. At present, it was anticipated that there would be a shortfall of 7,742, which would be redistributed through agreement with neighbouring district councils;
- The Council projected around 150 "windfall" dwellings each year that could be used for housing, (for example, at the backs of existing houses). Private landowners also had put forward sites for inclusion in the housing allocations;
- It was important to get the right balance between public open space and the need for housing. Under current proposals, some green space and green wedge would be lost, (for example, through development on part of a site while having open space on the rest of it), but the details of this would not be released until the final local plan was agreed;

- At present, there were five proposed new school allocations in the draft local plan; and
- Through the public consultation, suggestions would be invited of things to be included in Character Area Detailed Guidance.

Some concern was expressed about the amount of green field sites that could be lost, as there did not appear to be a specific target to encourage new house building on brownfield sites. It also was suggested that use of greenfield sites by neighbouring authorities could result in more traffic coming in to the city, with resultant increases in congestion and pollution. To reduce the potential impact of this, it was suggested that increasing the height of good quality developments could be considered, particularly in central locations, although using brownfield sites would be preferable.

In reply, the City Mayor explained that priority was being given to development on brownfield sites. However, Leicester was different to many other former industrial cities in that it had very tight boundaries and had already used many of its brownfield sites. Growth would be cross-boundary, so this Council needed to continue to work very closely with the neighbouring district councils. Suggested brownfield sites would be put forward in the draft local plan as suitable for development, but in the meantime any suggestions from Members for sites that could be used would be welcomed.

Members queried whether it was accurate that the city would run out of space for development. In reply, the Head of Planning reiterated that the city had a comparatively restricted amount of brownfield sites available for development, some of which had problems such as flooding or contaminated land. To help alleviate this, neighbouring district councils would be accepting approximately one-third of the city's projected growth up to 2031. After that, the Strategic Growth Plan indicated the potential to accept up to approximately two-thirds.

Members also suggested that it would be useful to have a definition of brownfield sites and information on what control the Council could have over housing and employment developments on them.

The Committee was reminded that a suggestion had been made in a previous consultation that a greenfield site could be considered for use as a sculpture park, as this could encourage people to come to the city.

Members noted that the land at Leicester General Hospital identified as a strategic housing site was in public, not in private, ownership. There already had been opposition to the development of this land for housing and the loss of health use. It therefore was suggested that it was inappropriate to include this in the local plan as a confirmed strategic housing site at this time.

The City Mayor acknowledged that further discussion about the site was needed, but explained that was the purpose of this consultation. As a general principle, the Council needed to be prepared to intervene when the market failed to regenerate sites. The Council had powers of compulsory purchase, which sometimes needed to be used boldly.



The following points also were made in discussion:

- A stronger commitment to supporting progress towards carbon neutrality and climate-adaptation should be included in the draft local plan;
- The introduction of internal space standards for student accommodation and houses in multiple occupation were welcomed, but caution was expressed pending receipt of the details of these standards;
- Housing officers were considering how unused privately-owned houses could be brought back in to use;
- Council housing would be part of the new housing provision set out in the local plan;
- A lot of young people could not afford “affordable housing”, so it would be useful to have a definition of what was considered to be affordable, (for example, the price range);
- Prohibiting development above certain heights was understandable for Character Areas, but could be inappropriate for other areas. Further debate on this therefore should be held;
- The area around St George’s Churchyard contained a lot of heritage assets that needed to be protected;
- The proposed number of additional units for the central development area was not ambitious enough;
- Currently there were industrial units being developed in the centre of the city and housing away from the centre. This should be reversed, so that industrial units were on the periphery. This would bring people in to the city and large vehicles would not have to come in to the city centre to service the units. Transport links also would need to be considered to improve the viability of this approach;
- If land needed to be improved in order that it could be used for housing or employment purposes, did the Council have any powers to require owners to do this or to acquire the land itself?
- Officers were already undertaking some detailed work on employment sites in the city. Some of these were well designed and were listed, so some flexibility was exercised on allowing them to be converted to housing, (despite being identified as employment sites), in order to retain them;
- It was predicted that the population would increase, so the local plan would need to include measures to ensure that infrastructure provision was appropriate, (for example, the appropriate number of schools and health centres). Five new school sites were proposed, three of which were already the subject of planning applications, and the Council was in dialogue with the Leicester City Clinical Commissioning Group and Hospital Trust regarding health provision;
- Improvements were needed to the former Imperial Typewriters building in East Park Road;
- Although Section 106 funding was mentioned, viability assessment indicated scope for this was limited; and
- Nothing would be included in the local plan that could not be demonstrated as deliverable.

AGREED:

- 1) That the report and presentation be received and noted; and
- 2) That the Director of Planning, Development and Transportation be asked to take the comments recorded above in to account in the preparation of the draft local plan 2019-2036 for public consultation.

# APPENDIX 3

North West Leicestershire		National		North West Leicestershire Annual Housing Requirement	
When	What	When	What	When	What
January 2017	Publication of Leicester and Leicestershire Housing and Economic Development Needs Assessment (HEDNA)			January 2017	481 dwellings 2011-31  448 dwellings 2031 -36
			<b>Housing white paper</b>		
		September 2017	Planning for the right homes in the right places: consultation  Confirmed the intentions outlined in the February 2017 Housing White Paper to introduce a standard method to calculate housing requirements. Included details of how it would operate.	September 2017	360 dwellings (2014-based household projections)
February 2018	Local Plan Review: Issues and Options Consultation				
		July 2018	Publication of National Planning Policy Framework.  Confirmed that: <i>“strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance”</i> (paragraph 60).		

		20 September 2018	2016 Household Projections published.		529 dwellings
		October 2018	<p>Technical consultation on updates to national planning policy and guidance</p> <p>Government proposed that</p> <ol style="list-style-type: none"> <li>1) For the short-term, to specify that the 2014-based data will provide the demographic baseline for assessment of local housing need.</li> <li>2) To make clear in national planning practice guidance that lower numbers through the 2016-based projections do not qualify as an exceptional circumstance that justifies a departure from the standard methodology; and</li> <li>3) In the longer term, to review the formula with a view to establishing a new method that meets the principles in paragraph 18 above by the time the next projections are issued.</li> </ol> <p>Pages 10/11</p>		
November 2018	Local Plan review: Emerging Options consultation				
December 2018	Response to government consultation on updates to				

	<p>national planning policy and guidance</p> <p>In response to question 1 regarding whether the 2014-based projections should provide the demographic baseline for the standard method , the Council responded that:</p> <p>“It is suggested that just as it is proposed to make clear that use of the 2016-based data should not be used to justify a lower housing need, then it should also be made clear that where the 2016-based data identifies a higher housing need than the 2014-based projections that this should, notwithstanding the general advice, be used to inform the local housing need”.</p>				
		February 2019	<p>Government response to the technical consultation on updates to national planning policy and guidance</p> <p>Confirmed that</p> <p><i>“the Government continues to think that the 2016-based household projections should not be used as a reason to justify lower housing need”</i></p> <p>(pages 7/8)</p>		

		February 2019	<p>Planning Practice Guidance: Housing and economic needs assessment</p> <p><b>Why are 2014-based household projections used as the baseline for the standard method?</b></p> <p>The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes.</p> <p>Paragraph 005</p>		
		March 2019	Publication of 2018 based affordability ratio	March 2019	379 dwellings (2014-based household projections with updated affordability ratio)
July 2019	Cabinet agrees to Partial Review to amend Policy S1 and to continue in parallel with Substantive Review.				
November 2019	<p>Local Plan Committee approves Reg 19 consultation on Partial Review</p> <p>Agrees to an interim housing requirement of 480- dwellings per</p>				

	annum as part of Substantive Review				
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## APPENDIX 4

		HOW CALCULATED	
Requirements 2019-2039	7,580	Standard Methodology 379 x 20	A
Projected completions 2019-2031 <sup>1</sup>	7,281	Housing Trajectory April 2019	B
Projected Completions 2031-2036 <sup>2</sup>	1,475	See note below	C
Projected completions 2036-39 <sup>3</sup>	315	See note below	D
Total projected completions 2019-2039	9,071	B + C+ D	E
Over/(under provision) 2019-2039	+1,491	E - A	F

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<sup>1</sup> It should be noted that these figures allow for the development of the reserve site at Molehill Farm, Kegworth but does exclude the two sites at Kegworth which will be affected by the proposed route of HS2. The figures also do not include any allowance for windfall sites (small or large).

<sup>2</sup> Projected Completions 2031 – 2036 is based on the completion of Money Hill (327 dwellings), Land North and South of Park Lane Castle Donington (59 dwellings), North of Standard Hill Coalville (20 dwellings), the strategic provision at Measham (120 dwellings) and the continuation of South-east Coalville (949 dwellings in total) as the outstanding developments not projected to be completed by 2031.

<sup>3</sup> Projected completions 2036-39 based on completion of remainder of South-East Coalville (315 dwellings – total post 2031 1,264 dwellings)