

## **Appendix 1: Proposed Response to Leicester Regulation 18 Consultation Sept. 2020**

### **Chapter 1: Introduction**

#### **1.3 and 2.2**

Harborough District Council welcomes consideration of the Leicester Urban Area as a whole (defined at para 2.2 as including the administrative area of Leicester City Council as well as neighbouring settlements including Scraptoft). However, it would be helpful for future consultations to clarify that the Leicester Local Plan will provide the overall strategic and spatial vision for the Leicester City administrative area only (and not for neighbouring settlements such as Scraptoft as suggested at paras 1.3 and 2.2) which fall outside of the administrative area for Leicester City Council and within neighbouring local authorities.

#### **1.11 to 1.14 Duty to Cooperate**

##### **Para 1.11**

Harborough District Council welcomes the ongoing engagement around how best to address the declared unmet housing needs of Leicester. We remain committed to working in partnership with the other district and borough councils in Leicestershire, the City Council and the County Council to seek to develop an agreed solution to this issue.

##### **Para 1.12**

Harborough District Council supports ongoing partnership working around unmet needs. To effectively plan to meet this need we need to understand not just the number of houses needed but also the size, type and tenure that is required. This information will be important for districts and boroughs when developing their own Local Plan policies on this issue.

We also welcome the early identification of employment as a further issue which may result in the need to declare an unmet need for employment. This issue is also likely to require co-operation to find a solution. We welcome the ongoing county-wide partnership engagement on this matter. Again, an understanding of not just the numbers, but also the kind and type of employment land that may need to be planned for, and any locational requirements is necessary. This information will be important for districts and boroughs when developing their own Local Plan policies on this issue.

#### **1.14 and 2.16 Statement of Common Ground (SoCG)**

Harborough District Council welcomes the ongoing engagement around how best to address the declared unmet housing and employment needs of Leicester. In particular we support the agreed approach that the most effective solution to address this problem is through a Statement of Common Ground, that sets out the issue and agrees numbers, but that it will be for Local Plans to set their own policies. For clarity it is suggested that the first sentence of 2.16 should refer to the City's need rather than the urban area's need.

## **2.22 Heritage**

Harborough District Council welcomes the recognition the plan affords to the value of the varied historic environment of the City and its wider social, cultural, economic and environmental benefits. The historic environment creates a sense of place and serves as a focal point for civic pride, tourism, inward investment and the creation of jobs which also benefit residents of Harborough District.

## **Chapter 3: Vision for Leicester**

### **3.1 Vision for Leicester**

Harborough District Council supports the vision for Leicester. However, we think it is important to recognise the role of Leicester as a City in the wider area. Residents of Harborough visit the City to access jobs, services, retail and cultural services, and hospitals and health care. Sustainable transport to access these opportunities is a key issue for residents of Harborough.

It is suggested that the vision should reference 'sustainable growth in housing, jobs and skills' rather than 'sustainability growth in housing, jobs and skills'

## **Chapter 4: Strategy for Leicester**

### **4.3 – 4.6 Leicester and Leicestershire Strategic Growth Plan**

Whilst HDC notes reference to the Strategic Growth Plan, it should be made clear that it is a non-statutory plan and delivery of the vision is dependent on the provision of major infrastructure.

### **4.10-4.12 Housing (Strategy/approach)**

Harborough District Council notes and supports the target of 1,712 dwellings per annum (dpa) (2019 – 2036) based on the current standard method for calculating local housing need. It is noted that the Leicester City Local Housing Needs Assessment (September 2020) updates the local housing need using the latest data to 1,734 dpa (2020 – 2036). Given its publication date, it is understood that this was published after the initial consultation on the Leicester draft Local Plan was planned and prepared, with the original March 2020 consultation postponed due to COVID-19 pandemic. The intention to use the latest local housing need figure should inform the next stage/s in preparing the Leicester in future stages of Local Plan preparation is supported.

The use of the current standard methodology rather than the amended methodology proposed within the Government's consultation on 'Changes to the Current Planning System' is noted and supported. This proposed amended methodology would result in a local housing need for Leicester City of 1,119 dpa. Given the very recent consultation and lack of confirmation of any resulting changes to the methodology, use of the current methodology is supported at this time. It is noted that amendment to the methodology and resultant local housing need figure for Leicester is likely to result in changes to the scale of unmet need.

Harborough District Council supports all the elements of the proposed strategy to meet housing needs in the City. We particularly welcome the emphasis on prioritising the development of brownfield land within the Central Development Area and suggest that the strategy recognises the contribution the reuse of appropriately located brownfield land can make to meeting housing needs more generally across the City.

The bullet points at 4.11 come under the heading of 'proposed options' but all appear to be elements of the proposed strategy set out in the Local Plan. All are supported given their contribution to meeting housing need within the City and maximizing opportunities to increase supply within Leicester City. It is not clear if any other options were considered in arriving at the strategy.

#### **4.13-4.14 Employment (Strategy/approach)**

Harborough District Council supports the City's proposed strategy to reverse the past trend and make provision for new employment land to boost the City's economy, and we welcome the acknowledgment that the City economy does not operate in isolation.

In light of the EDNA 2020 its suggested that para 4.14 is updated to set out the latest 'Need' figures by employment type, explain the preferred strategy, state the unmet need arising (equivalent to para 4.12) and cover any other options considered in arriving at the proposed strategy (i.e. 7 site allocations).

Prioritising the provision of high density / grade A offices in the City Centre is endorsed. However, it is important that the effects of the COVID-19 pandemic on the demand for office and the trend for remote-working are monitored over time to facilitate a plan/monitor/manage approach.

#### **4.17 Infrastructure**

Harborough District Council supports the City's intention to work closely with neighbouring authorities to address infrastructure needs resulting from growth and development beyond the City boundaries.

The provision of sufficient and timely infrastructure within the City to support the draft Local Plan's development strategy will be essential in delivering new development that does not unduly impact on existing residents of the wider Leicester urban area.

#### **4.18-4.20 Retail and Leisure Growth**

Harborough District Council welcomes the preparation of a new retail study given the importance of the City Centre to the wider population. It will be important that this takes into account the potential long-term impacts of the on-going COVID-19 pandemic along with recent changes to permitted development rights and the Use Classes Order.

#### **4.21-4.22 Strategic Green Infrastructure Network**

Harborough District Council welcomes the commitment to maintaining and enhancing the strategic green network, connecting the heart of the urban area to the surrounding countryside and the recognition of the role of Green Wedges within this network. Whilst Green Wedges are displayed on Diagram 02, the Leicester/Scraptoft/Bushby Green

Wedge (designated in the 2019 Harborough Local Plan under Policy GD7) is not shown and should be added.

### **Policy SLO1 Location of Development**

Harborough District Council supports the focus on the delivery of housing in the Central Development Area, on the five strategic sites identified and on smaller non-strategic sites in the City. It is important to make the best use of land, including previously developed land, throughout the City. The current level of unmet need from the City is noted and the Council will work alongside the City Council and other HMA local authorities in agreeing the distribution of this unmet need.

Harborough District Council supports the creation of 'High Quality Economic Development Areas' at the 3 strategic employment sites and the allocation of other local sites. It is noted that Beaumont Leys Park is named in this policy as one of these employment sites (referred to elsewhere in the draft plan as Beaumont Park). However, unless it is referred to by another name, there appears to be no site-specific allocation policy relating to it in this chapter.

The employment aspect of this policy will require updating to reflect the EDNA 2020.

### **Policies SL02 – SL06 Strategic Site allocation policies**

Harborough District Council supports the allocation of these large sites and the opportunity they offer to deliver housing.

In order to make the most efficient use of land, recognition should be made of the opportunity to deliver housing at a range of residential densities across strategic sites, in line with good master planning principles. This is likely to result in overall densities higher than the minimum 30d/ha densities assumed which could help to deliver increased levels of housing as well as providing for a range of building heights and varied neighbourhoods across the sites. Future master planning of these sites is welcomed to inform revised assumptions around densities and therefore capacity, to ensure that good use is made of these important strategic sites. For now, expressing the capacity of these sites as minimums would give some room for potentially higher densities should this prove possible.

In relation to the proposed employment allocations, Harborough District Council welcomes the intention to provide for a range of B class uses. Further master planning is suggested to provide clarity on an appropriate B class use mix for each site, optimize employment densities and support the efficient use of land. It would be helpful to be able to understand the contribution each site is expected to make to meeting the need for specific B class use types.

### **Policy SL02. Strategic Site 1: Western Park Golf Course (LCC owned)**

Harborough District Council supports the inclusion of a permanent Gypsy and Traveller Site within this allocation. The Gypsy, Traveller and Travelling Show-people Accommodation Assessment (GTAA) update suggests that a transit site is also needed and that this should be provided within the Western Park Golf Course site as

this is available for this use. HDC would support the inclusion of this provision within the allocation policy for this site.

HDC supports the inclusion of 20.5ha for employment use. The indication that this will deliver 70,000sq.m. of floorspace appears to suggest a relatively low average employment density. HDC would suggest the expression of floorspace figures as 'minimums' to encourage the effective use of land and potentially reduce the overall unmet need figure.

### **Policy SL03 - Strategic Site 2: Land to the east of Ashton Green**

Harborough District Council supports the allocation of this site. However, the employment element of the site (as referred to in Policy SL01) is not set out in the policy despite 'Land north of Birstall Golf Course' being referred to in the 'Strategic sites proposed for allocation in the draft Leicester Local Plan 2020' document as delivering B1, B2 and B8 uses and identified for employment in paragraph 4.26.

## **Chapter 5: Housing**

### **5.3 Housing**

Harborough District Council support the use of the standard methodology to establish the minimum Local Housing Need figure set out in the Planning Practice Guidance and the intention to update this before the next consultation. The recognition of the government consultation to comprehensively review the standard method is noted and it is agreed that it is not appropriate to use this method at this time.

### **5.6- 5.14 Housing Requirements and Supply**

The draft Local Plan makes provision for a minimum of 29,104 dwellings during the plan period (2019-2036). This represents the local housing need, calculated using the existing standard methodology at 2019 figures (1,712 dpa X 17 years = 29,104).

It is understood that 29,104 dwellings will be delivered through: existing commitments (9,827 dwellings as at 31<sup>st</sup> March 2019); allocated sites identified within the draft Plan (1,486 dwellings); strategic sites identified within the draft Plan (2,594 dwellings); capacity in the City Centre Development Area (4,905 dwellings); a windfall allowance of 150 dpa based on past delivery rates (2,550) resulting in a total delivery within Leicester City of 21,362 dwellings, with a remainder of 7,742 dwellings to be accommodated within the rest of the Leicester and Leicestershire Housing Market Area.

Harborough District Council supports the approach of maximizing potential housing development within the City in order to minimise the amount of unmet need that needs to be accommodated elsewhere. In establishing the scale of need that cannot be accommodated within the City boundary it is important to review the assessment of sites.

The evidence document entitled 'Sites methodology for the draft Leicester Local Plan 2020' is useful in this respect. It sets out the process that was undertaken to assess the suitability of sites for allocation within the draft Local Plan and sets out future work planned. It outlines the work undertaken to produce the Strategic Housing and

Economic Land Availability Assessment (SHELAA, 2017) to identify the initial list of potential sites, It is understood that to this initial list were added additional sites, including those arising from subsequent Calls for Sites. A number of sites were not taken forward for subsequent assessment, including those with planning permission, within the Central Development Area (assessed separately) and 1 wholly within the functional floodplain, resulting in 240 sites taken forward for further assessment.

Each site was assessed against a range of technical criteria, with an initial RAG (Red, Amber or Green rating) provided. The intention to publish a complete RAG rating for each site against these technical criteria at the next stage of public consultation on the Local Plan is noted. Harborough District Council welcomes sight of that detailed assessment of each potential housing site. It is understood that further assessment including the results from Sustainability Appraisal, assessment against Local Plan objectives, Stage 2 Strategic Flood Risk Assessment and deliverability and viability assessments were then undertaken to identify the non-strategic allocations currently set out at Appendix 5 of the draft Plan together with the strategic allocations. This appears to be a comprehensive and robust method of identifying suitable sites.

HDC note that the capacity of both strategic and non-strategic sites for residential development has been calculated using 'Sites Methodology for The Draft Leicester Local Plan (2020)'. This states that the capacity has been estimated in accordance with the 'HMA Paper methodology' (HMA SHELAA Joint Methodology Paper (2019)). This is an agreed methodology across the Leicester and Leicestershire HMA and therefore HDC are content with the use of this method to establish the development potential of small to medium sized sites for residential development. However, the HMA SHELAA methodology paper sets a density range of 30-50dph for sites outside the city centre.

Clarification on the density assumptions used for establishing the capacity of these sites would be welcomed. It appears that 30 dph has been used – the lower end of the range and therefore the site capacities should be expressed as a minimum. Further work is needed to understand the likely densities based on what has been achieved elsewhere in the City. Linked to this, it is important that local plan policies encourage higher densities in urban areas to make the most efficient use of land, in particular land close to public transport hubs.

Furthermore, this method is unlikely to be appropriate for larger strategic sites where a range of densities across the sites are likely to be achieved in line with good master planning principles. This will help to make the best use of land. Therefore, HDC would welcome master planning of the five strategic sites in order to establish the development potential and housing capacity. This may include reviewing any opportunities for high densities within parts of the allocated sites, in particular close to key local facilities and public transport provision.

Additionally, it is vital that any new sites that may come forward as part of this current consultation are considered in order to inform future reviews of the scale of unmet need for the City.

### **5.20-5.21 Meeting a Range of Housing Needs**

Harborough District Council support the intention to provide a range of housing to meet the variety of needs in the City. The HEDNA (2017) notes the challenges of an aging population, and the challenges facing those with disabilities. It is important that these needs are effectively planned for. HDC recognise that there are some specialist needs that will need to be met through a joint approach. For example, specialist provision for those with severe autism, mental health, bariatric and/or complex needs may require new provision that serves the population of a wider area than just the City or Harborough. We look forward to working with the City and other partners to address this issue.

### **5.22 Housing Mix**

Harborough District Council is keen to understand what elements/sectors of Housing Need are considered to be unmet. This will be important in informing our own Local Plan policies.

#### **Policy Ho03 Housing Mix**

Harborough District Council welcomes the aim to provide a range of house sizes, types and tenures and support the requirements for accessible homes. We note the challenges of securing the delivery of specialist housing, and note that it is likely that the provision of specialist housing is likely to meet the needs of particular groups across LPA boundaries.

HDC would welcome opportunities to work in partnership with the Council to secure provision that addresses these needs through a joined-up approach. We would welcome information and evidence on this matter, particularly if it evidences the need to allocate sites within the City to meet some of these very specialist needs, and identifies what component of specialist needs need to be considered across the county.

#### **Policy Ho04 Affordable Housing**

Harborough District Council welcome the requirement to provide Affordable Housing. HDC would be keen to understand what impact factors such as the COVID-19 pandemic and the ongoing uncertainties around Brexit, may have on the delivery and viability of affordable housing. In particular HDC note the government's proposed changes to the affordable housing thresholds, in the short term, and new products such as First Homes in the mid to longer term; both of these may impact on affordable housing delivery.

HDC are keen to understand the linkages between unmet general needs and unmet affordable needs, so plans to meet the unmet need provide the right size, type and tenure of affordable housing as an integral part of meeting unmet housing needs beyond the City boundary. The issue of density is also likely to be relevant, if the plan is able to deliver higher density developments this will in turn be likely to impact positively on viability, and the amount of affordable housing that can be delivered and/or the type of product(s).

### **5.51-5.59 Gypsies and Travellers and Travelling Show-people**

Harborough District Council support the intention to allocate sites for permanent Gypsy and Traveller pitches to meet the need identified in the City. A range of provision is important to enable Gypsy and Travellers to travel. It is important that all local authorities play their part in helping to meet this need.

### **5.60 Transit sites**

Harborough District Council support the intention to meet the identified need for a Gypsy and Traveller transit site as part of the Western Park Golf Course allocation. This commitment could usefully be noted here.

## **Chapter 6: Climate Change and Flood Risk**

### **6.3 Background**

Given the cross-boundary nature of the impacts of climate change and flooding, Harborough District Council welcomes recognition that there is a need to work strategically with adjoining local authorities to find solutions to climate change across the Leicester Urban Area. Harborough District Council also declared a climate emergency in 2019 and has an action plan in place setting out the Council's commitment to tackling climate change.

### **Policy CCFR01-Sustainable design and construction for new developments**

Harborough District Council welcomes the measures set out in the policy requiring development to minimise energy demand and carbon emissions, maximise the efficient use of resources, and incorporate resilience to climate change, benefitting local communities within and adjoining the City.

### **Policy CCFR02- Delivering renewable and low carbon energy projects**

Harborough District Council welcomes the approach to new renewable and low carbon energy projects and the potential impacts that need to be considered. Many of the impacts listed have the potential to affect the wider Leicester Urban Area, including Harborough District and its residents. Whilst the policy at present lists the impacts, it does not make clear if or how mitigation will be taken into account in the determination of applications.

### **Policy CCFR03 – Managing Flood Risk and Sustainable Drainage Systems (SuDS)**

Harborough District Council supports the approach to managing flood risk and the expectation that all development will make use of SuDS which deliver multiple benefits. Promoting opportunities to enhance watercourses and access to them for recreational purposes is welcomed, having the potential to deliver improved biodiversity, water quality and health & well-being benefits to residents of the wider Leicester urban area and visitors.



## **Chapter 7: Health and Wellbeing**

### **7.12 Health Impact Assessments (HIA)**

Harborough District Council residents access facilities in Leicester, and therefore facilities may serve a wider area than just Leicester City. Health Impact Assessments for sites on the edge of the City and/or strategic sites will need to reflect these cross-boundary implications.

## **Chapter 8: Delivering Quality Places**

### **Policy DQP01- Design Principles**

Harborough District Council welcomes policies which promote good design and encourage the efficient use of land, including through densification. HDC would welcome recognition in the policy that development may have impacts, particularly on transport and infrastructure which extend beyond the City boundary.

HDC also support plans to focus development in the most sustainable locations including centrally located development opportunities, as this will help to minimise the need to plan to meet unmet need elsewhere, in potentially less sustainable locations.

### **8.08-8.13 Tall Development**

Harborough District Council recognises the contribution that well-designed and appropriately located tall developments can make to the City of Leicester and welcomes the inclusion of Policy DQP02: Tall Development.

Harborough District Council supports Leicester City Council's intention to produce a supplementary planning document providing further guidance on tall development, which will provide guidance in respect of specific areas including heritage assets and local townscape views, local heritage views and views and vistas of City-wide significance.

### **Policy DQP03- Inclusive Design**

Inclusive design is important for residents of Harborough when accessing employment opportunities and services in Leicester City.

### **8.33-8.35 Architectural and Feature Lighting**

Harborough District Council supports the 'Architectural and Feature Lighting Strategy' for the City which aims to bring out the character of the City and highlight the City's rich heritage.

## **Chapter 9: Central Development Area**

Harborough District Council supports the strategy that the Central Development Area (CDA) is a focus of major housing development, employment and physical regeneration.

Policies CDA01 and CDA03 (Uses within Character Areas) specifically list residential uses as 'Primary' for 4 of the 9 character areas identified, with the remaining character areas being the focus for locally specific uses (such as major offices uses for the

Railway Station area and uses connected with Leicester Royal Infirmary, DeMontfort University and Leicester Tigers stadium in this area). This approach is supported in order to maximise housing provision within relevant character areas within the Central Development Area.

B class employment uses are identified as 'Primary' for 7 of the 9 character areas, albeit employment provision is only quantified in 2 areas (Railway Station, St Georges Cultural Quarter). It is unclear whether / or to what extent the other 5 character areas contribute to employment land supply to help meet employment need; clarity would be helpful.

Similarly, in respect of policies CDA04 and CDA05 for 'Other Regeneration Areas' both 1. Abbey Park and Pioneer Park and 2. Waterside appear to include elements of new employment provision. Again, HDC would appreciate clarity on the extent to which these areas / sites contribute to employment land supply to help meet overall need, and whether this potentially reduces the City's unmet need for employment. It is noted that the Science and Innovation Park at Pioneer Park (EZ) is targeted at specific types of businesses, but the land use is nevertheless B class in nature.

## **9.2 Background**

Harborough District Council recognises the need for development in the central area and welcomes the use of townscape analysis in order to identify the distinctive character areas and development objectives of the Central Development Area. This is an area rich in historic assets which reflect the story of the development of both the City and the wider county, so the clear focus given to the respect and protection of heritage assets within the character area management options is welcomed.

### **9.13 Townscape Character Management**

Harborough District Council would like to see the 'protection of heritage assets' included alongside 'intensification' and 're-development' within the character area management options for the Railway Station area (Table 06) in order to recognise the value of the Grade II listed station, other local list assets and buildings which make a positive contribution to the townscape.

## **Chapter 10: Heritage**

### **10.2-10.3 Background**

Harborough District Council welcomes Leicester City Council's recognition of the importance of the City's rich and varied historic environment, as this provides knowledge about the development of both the City and the wider county. Harborough District Council feels that recognition of the value afforded to heritage is demonstrated in the background studies which underpin the Plan's policies regarding heritage. Of particular note is the Heritage Action Plan which included the completion of a Heritage at Risk Register as a milestone. One of the targeted interventions resulting from this was a structural survey on the former gates of Quenby Hall. Whilst these gates have not been in Quenby for two centuries, they do have an historical association with Harborough District.

## **10.4 The Historic Environment**

Harborough District Council is encouraged to note that the rich variety of Leicester's heritage is not only recognised by the nationally designated heritage assets but through the 394 entries on the Local List, which includes both buildings and archaeological sites, and that heritage assets are afforded protection through the active use of Article 4 directions and controls over the display of advertisements. Such actions help to maintain the quality of the historic environment which can be enjoyed by residents of Harborough during their time in the City.

### **Policy HE01: The Historic Environment**

Harborough District Council supports Policy HE01, The Historic Environment. It is especially encouraged to see the following inclusions:

- where the case for demolition within a Conservation Area has been demonstrated and accepted, permission will not be granted until a suitable redevelopment scheme has been approved
- discouragement for the demolition of local heritage assets and support for proposals that seek the sensitive re-use of local heritage assets and encourage the integration of local heritage assets and new development, creating attractive spaces that add to the City's character and local distinctiveness.

Whilst the above not only seek to preserve and enhance the historic environment of the City they also avoid the negative impact of derelict sites or deteriorating heritage assets which can detract from the quality of place and make areas unattractive.

## **Chapter 11: Culture and Tourism**

### **11.6 Tourism**

Harborough District Council supports the Connecting Leicester Programme as the work undertaken in recent years to link important heritage sites with the modern retail heart of Leicester has benefitted Harborough residents using the city especially for leisure and shopping activities.

## **Chapter 12: Employment**

Harborough District Council welcomes the overall strategy set out in Para 12.10-12, and affirmation that the Leicester and Leicestershire economies are interdependent. Leicester is a strategically important business destination and significant provider of 'B class' and non-B class jobs for Harborough residents. We support the delivery of offices being a top priority for the City Centre, and the proposal to deliver new employment land at strategic and local sites, and we are committed to working in partnership with the City and other Leicestershire authorities to address the issue of the City's unmet employment need through the Statement of Common Ground (SoCG).

In terms of unmet employment need it would be helpful if the Plan set out in more detail the components of the City's employment provision (by B class use, if possible),

perhaps in a table equivalent to Table 1 Housing provision from 2019-2036 (at Para 5.13 Housing).

In addition, unlike Chapter 4 (Housing), this chapter does not include sub-sections on 'requirements and supply' or 'allocations'. Additions such as these would help to explain what if any contribution existing employment commitments and/or character areas within the Central Development Area (CDA) make to meeting 2019-2036 need, the options or alternative approaches considered, and the assessment process carried out to identify the draft employment allocations. Together these would help stakeholders to understand not just the numbers, but also the type, nature and any locational requirements of unmet need to support duty to cooperate discussions around re-distribution.

Table 07 lists 6 new employment sites, it would help to be more explicit about which B class use need they each contribute towards. Notably, and as mentioned previously, Beaumont Park and the 2 small sites do not appear to have site policies.

Harborough District Council supports Policies E01-E06 which provide some useful parameters for the protection of existing employment areas. Recent changes to the Use Class Order introducing Class E may have implications and necessitate some minor changes to the policy wording.

## **Chapter 13: Town Centre and Retail**

### **Policy TCR01: Hierarchy of Town Centres**

Harborough District Council welcomes recognition of the City's role as the 'central City' (or sub-regional centre) and the way in which it supports surrounding market towns and rural areas. Harborough district residents rely on Leicester city for a wide range of higher order shops, services, cultural and entertainment facilities which are focused in the City Centre and are dependent on maintaining its viability and vitality as it adapts to changing circumstances. We support the strategy to focus new retail development within the City Centre as set out in the policy.

#### **13.13 Need for new floorspace for comparison and convenience retail provision in the City**

Harborough District Council supports the preparation of up to date retail evidence to determine the need for new comparison and convenience floorspace. This will be an opportunity to consider the impact of online retailing, changes to Use Classes Order, and potential longer-term impacts of the COVID-19 pandemic on the need for retail floorspace going forward. Its findings will not only feed into retail policy but may also impact on other aspects of policy, such as the housing strategy.

#### **13.15 The City Centre**

Harborough District Council supports the vision of the Connecting Leicester initiative. Improved linking of Leicester's range of heritage sites, retail, leisure and cultural highlights to create a strong and vibrant City Centre which will be an attractive

environment for residents of Harborough district who visit the City for health, business and leisure reasons.

### **Policy TCR03: City Centre**

Harborough District Council welcomes the approach to supporting and reinforcing the role of the City Centre which recognises its central role. Given the changing nature of retailing, the policy takes a flexible approach to development within City Centre in order to ensure its continued vitality.

Harborough District Council supports enriching the retail, leisure and tourism experience, by protecting and enhancing the historic environment by encouraging the re-use and improvement of heritage assets, and through the use of heritage-led regeneration within other cultural areas in the City Centre.

### **Policy TCR04: Central Shopping Core (Primary Shopping Area)**

Whilst Harborough District Council supports the identification of a Primary Shopping Area, the policy needs to reflect the changes to the Use Classes Order and the potential implications for the overall strategy may need further consideration.

## **Chapter 14: Open Space, Sports and Recreation**

### **Diagram 15**

The Leicester/Scraptoft/Bushby Green Wedge as designated by Policy GD7 of the Harborough Local Plan (2019) is not shown and should be added. The map does not appear to show the Grand Union Canal despite the legend including River/canal.

### **Policy OSSR01: Green Wedges**

Harborough District Council supports the commitment and approach to Green Wedges as set out in the policy. Recognising their varied and valued role as strategic green infrastructure assets and the fact that they extend out into the surrounding district/borough council areas, the policy approach set out is welcomed and is complementary to Harborough Local Plan's Green Wedges policy.

## **Chapter 15: Natural Environment**

### **15.2-15.7 (Background / Strategy)**

Harborough District Council supports the overall strategy for the natural environment and notes the acknowledgement that the policies may need to be reviewed following changes in legislation on biodiversity. The overall policy approach recognises the multiple functions and benefits that the City's green infrastructure network can fulfil. These benefits will contribute to the health of not only the natural environment across the wider Leicester Urban Area but also its residents in terms of health and well-being. Reference in paragraph 15.2 to continued working with partners, including neighbouring local authorities, is welcomed.

Furthermore, in reference to paragraph 171 of the NPPF which requires local plans to take a strategic approach to the maintenance and enhancement of habitat networks, green infrastructure, and natural capital, there is potential to expand this policy by

taking a more proactive approach. For example, by establishing a strategic Nature Recovery Network in conjunction with neighbouring authorities. HDC would be supportive of such a proactive approach.

### **Policy NE02: Biodiversity Gain**

Harborough District Council supports the seeking of biodiversity net gain in major developments. However, criterion a) only specifies that an overall net gain 'has been sought' rather than 'secured', 'agreed' or 'achieved' (wherever possible).

### **Policy NE04: Ancient Woodland and Veteran Trees**

Harborough District Council welcomes the protection that this policy affords ancient and veteran trees which, are of high biodiversity value and are not easily replaced given the length of time taken for trees to reach this stage of maturity. There may be scope to use stronger language in Policy NE04, to echo paragraph 175c of the NPPF by replacing '...will not normally be permitted except where:', with '...will be refused, except where:'.

## **Chapter 16: Transportation**

### **16.18 Buses**

HDC would welcome opportunities for the Plan to promote and develop Smart Transport for joined up ticketing beyond the City boundary.

### **Policy T05: Freight**

Harborough District Council supports this policy and suggests that, where appropriate, the conclusions and recommendations of the Warehousing and Logistics in Leicester and Leicestershire Study – Managing Growth and Change final report (currently being finalised) are reflected in the Plan. It may also be helpful to reference the provision of space and facilities for the charging of commercial electric vehicles, including at new employment development, and encouraging design mitigations that remove any need for time restrictions on deliveries, in support of the de-carbonisation of freight agenda and the 24/7 nature of the sector.

### **Policy TR08: Supporting Low Emission Vehicles**

Harborough District Council suggest that it may be helpful to consider making reference to the provision of parking and facilities for the charging of commercial electric vehicles, including at new employment development, and encouraging design mitigations that remove any need for time restrictions on deliveries, in support of the de-carbonisation of freight agenda and the 24/7 nature of the sector.

## **Chapter 18: Development and Infrastructure**

### **Policy DI01: Developer Contributions and Infrastructure**

Harborough District Council (HDC) welcome this policy which ensures that development will be required to mitigate its impact and deliver the necessary infrastructure, secured by planning condition and/or planning obligation.

An important part of the Local Plan in relation to seeking the delivery of infrastructure. Harborough District Council acknowledge that the City Council has prepared an Infrastructure Assessment (IA) for this stage of the plan preparation process, which sets out the engagement with service providers, and the scope and range of infrastructure required. The IA will assist in informing the preparation of an Infrastructure Delivery Plan (IDP) which should reflect the City Council's priorities and set out the essential infrastructure to support development and growth. It is considered important that any impacts on the wider area and conurbation, are supported through appropriate mitigation measures or infrastructure needs, where appropriate. The IDP is an important part of the evidence base for the Local Plan as it identifies infrastructure capacity and needs, as well as the costs and the sources of funding and timescales for the provision of various infrastructure.

### **Policy DI01: Developer Contributions and Infrastructure Viability**

Harborough District Council welcome the whole plan viability study which is clearly explained and sets out a complex issue in clear way. We note the work as undertaken in 2019, in different times and would welcome an update or refresh that considers what if any impacts on viability may result from the COVID-19 pandemic, ongoing Brexit uncertainty, the Government's plans for First Homes and other potential changes to affordable housing thresholds etc. We note that the viability is quite marginal in some circumstances and would be keen to understand what impact changes to the type and mix of houses would have on the plan-wide viability. We are keen to understand what size, type and tenure of housing are viable to deliver within the City, and therefore what components of the housing need, would make up the unmet need that requires accommodating elsewhere. We would also welcome a more detailed consideration of the viability of key strategic sites when these are subject to master planning. We note that the Housing Study uses the lower range of density c. 30dph in most cases, and would be keen to understand what impact increasing density would have on viability.

### **Policy DI01: Developer Contributions and Infrastructure Monitoring Fees**

Harborough District Council support the need for monitoring fees to be collected to cover the costs of monitoring planning conditions and legal agreements.

## **18.10 Developer Contributions and the Provision of Infrastructure**

Harborough District Council welcomes in principle the proposal that the City Council will work with its neighbouring authorities on infrastructure needs arising from growth and development of sites beyond the city boundary. In particular this requires consideration of interdependent infrastructure and critical dependencies beyond the City Council administrative boundary.

HDC however consider it is important that cross boundary infrastructure needs arising from major developments within the City, which may have implications on the LUA and wider area, are recognised and infrastructure is delivered to mitigate the impacts, where necessary to support growth and development. The provision of sufficient and

timely infrastructure will be essential to deliverable, viable, new development that does not unduly impacting on existing residents of the wider Leicester conurbation.

The consideration of wider supporting infrastructure across administrative boundaries is also important; in relation to the continuation of close working relationships and to ensure a co-ordinated approach to identifying and delivering infrastructure, for example, the close partnership work with the Leicestershire authorities on the Strategic Growth Plan which has assisted the assessment of long-term strategic infrastructure needs within Leicester and Leicestershire.

## **Chapter 21: Monitoring**

Harborough District Council notes the importance of monitoring the Local Plan and other contextual factors, particularly in light of Brexit and the COVID-19 pandemic. We welcome the intention to produce a robust monitoring framework as part of the submission version.

### **Supporting Documentation**

#### **Economic Development Needs Assessment (EDNA)**

Harborough District Council were able to attend the City Council's workshop on this issue, hosted by their consultants. We welcome the opportunity to be engaged in this issue at this early stage.

Harborough District Council welcomes the findings of the EDNA 2020, and acknowledges the significant amount of work involved and detail provided in this evidence study. We note the 2 methods used and the 3 scenarios tested to forecast employment need to 2036, and the preferred approach based on Historic take-up – Gross adjusted trends, with a 5yr buffer to enable the City to plan for continued growth that reflects past trends and current market signals.

It is appreciated that need figures in the draft Local Plan (principally Chapter 12) remain to be updated based on the EDNA 2020. In doing so, it would be helpful if the Plan set out a breakdown of the Total need figure by B class use (as per EDNA Table 37) and the components of the City's employment provision (by B class use, if possible), perhaps in a table equivalent to Table 1 Housing provision from 2019-2036 (at Para 5.13 Housing) to aid understanding.

Based on our reading of the EDNA, the following detailed observations are made which have the potential to affect the need and 'unmet' need figures.

- Table 37 (Preferred modelling) appears to omit need derived from B class (Mixed) and B1 Class (Mixed) which has the potential to add 1.38Ha and 6.44Ha to overall need, increasing it from 67.32Ha to 75.14Ha
- City employment monitoring only records floorspace, not site area. Therefore, standard plot ratios are used to convert floorspace (sq.m) need into land (Ha) area. No information is presented in the EDNA to substantiate whether these densities are typical of past / recent developments or an appropriate basis for development at proposed allocations. Optimising employment densities is important to support the efficient use of land.



- Chapter 7 / Table 46 states 2019 supply as 47.41Ha and 40,000sqm. However this appears to exclude contributions from any: committed employment sites (sites with permission, yet to be developed), Potential Development Areas (ref. Para 6.29 / 7.13), regeneration areas (i.e. Pioneer Park Innovation Park and Waterside) & some character areas within the CDA, other very small sites (ref. Para 7.14), and alternative / additional options (Para 7.18).
- Little information is included on any sites research conducted as part of the EDNA, or any assessment process used by BE Group or the City Council C to assess site options, capacity and select strategic sites / local allocations.
- Lack of clarity regarding the contribution each allocation / element of supply makes to specific B class use need – accept flexibility of use on individual sites is necessary to respond to the market, however further detail / breakdown to indicate minimum assumptions would be helpful.
- 2019 supply stated in EDNA Conclusions, Executive Summary, Table 28 and draft Local Plan as 40.9ha (incl. 2Ha for 40,000sqm of office), but at Table 43 supply is stated as 47.41ha – does this reflect some assessment of “realistic” supply
- Unmet need variously stated as 19.91ha (Table 46) or 28.42ha (Para 9.70) in EDNA and 23ha in discussion with partner authorities. Clarity necessary.

### **Leicester City Local Housing Needs Assessment 2019, published Sept 2020**

Harborough District Council welcome the findings of this document and the provision of further detail on the Housing Needs in Leicester. This will be important for considering how best to meet any unmet need and inform policies in HDC’s next Local Plan.

### **Infrastructure and Viability Appraisal, 2019**

Harborough District Council welcomes the opportunity to be engaged in this issue at this early stage and HDC fed comments into the report as it was developed. The study methodology reflects current guidance for this topic, and we are supportive of the approach adopted. We would welcome further guidance on the size and type of unmet housing need that the City is asking to be accommodated elsewhere. This information will be important for others drafting Local Plan policies.

We are mindful that COVID-19 pandemic may have an impact on development viability but that it is also possibly too early to tell what this may be at this point in time. Our intelligence to date shows a mixed picture with many developers reporting being optimistic about the future demand, whilst others are more cautious. We would support keeping this matter under review, with a further update/sense check being provided with the Reg 19 Local Plan.

### **Leicester City Council Gypsy and Traveller Accommodation Assessment Addendum, Sept 2019**

Harborough District Council welcomes the update to the GTAA. HDC welcomes the identification of the need for a transit site in the City and the identification of an available site, at Western Park Golf Course to meet the need. The fact that the site is in the Council’s ownership makes delivery highly likely. Gypsy and Traveller issues

require a joined-up approach, as by definition travelling is a key component of this issue. HDC would also welcome the City Council exploring opportunities for temporary seasonal transit provision, as suggested in this report. HDC strongly support the delivery of pitches through allocated sites for permanent and transit, and temporary pitches, as we have found this to be an effective way of helping to address unauthorised encampments.

### **Leicester City Council Water Cycle Study, July 2020 Final Report**

Harborough District Council note that Table 2.3 Scraptoft North SDA may require an update to reflect current information that delivery will start from 2021/22, not 2020/21. It would be useful if the report could reflect the current information either through an update or an addendum.

**November 2020**