

HARBOROUGH DISTRICT COUNCIL

REPORT TO THE CABINET MEETING OF 30 NOVEMBER 2020

PUBLIC REPORT: Y

EXEMPT REPORT: N

Report Title	Response to Leicester City Council's Draft (Regulation 18) Local Plan Consultation
KEY DECISION	N
Report Author	Rachel Danemann - Principal Planning Policy Officer
Purpose of Report	To seek approval for submission of comments to Leicester City Council's Draft (Regulation 18) Local Plan Consultation
Reason for Decision	To provide a consultation response to Leicester City Council's Draft (Regulation 18) Local Plan and supporting documentation and offer constructive comments and suggestions for improvements to ensure any potential impact of proposed allocations and policies in relation to Harborough District are considered.
Portfolio (holder)	Councillor P King (Strategy) Councillor J Bateman (Regulatory)
Corporate Priorities	PLACE: An enterprising, vibrant place CO 2 Wider Employment Choice CO 3 Quality Homes for All
Financial Implications	Nil. Responding to other Council's Local Plan is a function of the Strategic and Local Planning team and as such is undertaken within the existing financial and staffing resource of the Council.
Risk Management Implications	See section 3.0 below.
Environmental Implications	Leicester City Council's Draft (Regulation 18) ¹ Local Plan identifies allocations for new homes, employment land and for other uses. It will include policies used to determine planning applications. The environmental impacts of such allocations and policies are considered through the plan-making and development management process.
Legal Implications	The opportunity to comment on Leicester City Council's Draft (Regulation 18) Local Plan assists us in meeting the requirements of the Duty to Cooperate and enables us to seek to influence policies and site allocations and consider

¹ Regulation 18 of the of the Town and Country Planning (Local Development) (England) Regulations 2012 requires Local Planning Authorities to consult on the Draft version of their Local Plan

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	any potential impact in relation to Harborough district. The Local Plan production process, including the consultation requirements is governed by legislation.
Equality Implications	Responding to this consultation will enable the consideration of any potential equalities' issues in relation to Leicester City Council's Draft (Regulation 18) Local Plan.
Data Protection Implications	Comments submitted to the Leicester City Council Draft (Regulation 18) consultation will be publicly available and feed into Leicester's plan making process.
Consultation	This report seeks Members' approval of the proposed response to Leicester City Council's Draft (Regulation 18) Local Plan, as part of Leicester's City consultation on their Plan and supporting documentation.
Options	<u>Not responding to Leicester City Council's draft (Regulation 18) Local Plan consultation</u> - The views of the Council would not be known to Leicester City. There are not considered to be any appropriate alternative options.
Background Papers	None.
Appendices	Appendix 1: Draft response to Leicester City Council's Draft (Regulation 18) Local Plan consultation
Recommendations	1. That Cabinet approve the submission of the consultation response (Appendix 1) to Leicester City Council's Draft (Regulation 18) Local Plan consultation.

1 Introduction

- 1.1 Leicester City Council are currently consulting on their draft (Regulation 18) Local Plan. The consultation was originally launched in March but was paused due to the COVID-19 pandemic, but has now been relaunched, with a new deadline for the submission of responses of 7th December 2020. As a neighbouring authority and as a partner in joint Leicester and Leicestershire wide strategic planning work, it is important the Council responds to this consultation. Comments are sought on the draft Local Plan itself, including the draft policies and proposed site allocations, and associated evidence.
- 1.2 It should be noted that Regulation 18 is the first statutory consultation stage for this plan, and there will be further opportunities to comment both informally, through ongoing partnership work as the plan advances, and formally, once the plan is published and formally consulted upon (under Regulation 19²) prior to the plan being submitted to the Planning Inspectorate.

² Regulation 19 of the Town and Country Planning (Local Development) (England) Regulations 2012 Planning Authorities to undertake consultation on the Submission version of their Local Plan.

- 1.3 The suggested consultation response (Appendix 1) focuses on key issues and consideration of potential impacts for Harborough District, and comments on the supporting documentation have taken the same focus.

2 Key Facts

- 2.1 Leicester City Council are currently consulting on their draft Local Plan. This is the first statutory consultation stage in preparing the next Leicester City Local Plan which will eventually replace their current adopted 2014 Core Strategy and remaining saved local plan policies from the 2006 City of Leicester Local Plan.

- 2.2 The draft Local Plan sets out the vision and objectives for growth of the city over the next 15 years. It will allocate strategic and non-strategic development sites, sets clear policies that guide decisions on planning applications and set out how the plan will be delivered.

- 2.3 The draft Local Plan raises some key considerations for Harborough District. Potential impacts have been identified in relation to:

- Housing Numbers, and unmet need requirements
- Employment
- Transport
- Climate Change
- Gypsy and Travellers sites
- Sites and policies which impacts at our boundary, particularly at Scraftoft/Thurnby/Stoughton, and the Green Wedge policy

- 2.4 The full set of suggested comments can be found in Appendix 1. Some key issues have been highlighted below:

- 2.5 Housing Numbers is a key issue as the draft Leicester Local Plan identifies an unmet need of 7,742 dwellings for Leicester during the plan period 2019-2036 (from a total housing provision of 29,104 dwellings over this period). It is anticipated that this unmet need will be accommodated by partner authorities within the Leicester and Leicestershire Housing Market Area including Harborough under the Duty to Cooperate. The scale of unmet need identified within the draft Leicester Local Plan may be subject to change as the plan progresses. The proposed consultation response notes the declared level of unmet need from the City and the fact that the Council is working alongside the City Council and other HMA local authorities in seeking to establish an appropriate way forward in relation to the distribution of this unmet need. Partnership work is ongoing around a Statement of Common Ground (SoCG) on this issue. Any emerging SoCG will be considered in accordance with the Council's governance procedures.

- 2.6 In relation in housing need, the suggested response includes comments on both the methodology and site assessments and seeks to ensure that all opportunities for residential development within the City have been fully maximised, so that unmet need is minimised. The proposed response highlights

areas where it is felt further work would be useful to ensure the evidence of unmet need is as rigorous and robust as possible.

- 2.7 The ability of Leicester to meet its identified housing needs within its boundary will be affected by a number of factors including density. The proposed response questioned if there are opportunities for higher density development within the city.
- 2.8 In relation to employment land, the Economic Development Needs Assessment (2020) identifies a potential shortfall of employment land, and this unmet need will need to be accommodated elsewhere. The proposed response highlights potential opportunities to maximise delivery of employment land and ensure efficient use of sites, to minimise the levels of unmet need.
- 2.9 The Regulation 18 draft Local Plan proposes a new permanent site for Gypsy and Travellers within the City boundary, and a policy for transit sites. In the proposed response, both of these are welcomed.
- 2.10 The proposed response notes the importance of cross-boundary issues such as Transport and Climate change and highlights the need for development proposals to consider their impact beyond the City boundary.
- 2.11 Green Wedges have been an importance planning tool in Leicestershire for many years. Synergies of the Green Wedge mapping and policies is important for their form and functionality. The proposed response identifies some areas in inconsistency that could usefully be addressed.

3 Risk Management Implications

- 3.1 Responding to the Leicester City Local Plan Regulation 18 consultation helps ensure Leicester City Council consider and responds to issues in their Plan that could potentially impact on Harborough District.

4 Legal Issues

- 4.1 Responding to the Leicester City Local Plan Regulation 18 consultation is an important part of working together under the Duty to Cooperate.

5 Equality Implications

- 5.1 The City Council will need to consider any equalities issues when preparing and consulting on their plan. They have prepared an Addendum to their Statement of Community Involvement, which sets out how they are continuing with their plan preparation and enabling engagement and in light of COVID-19 pandemic. This approach is noted.

6 Options

- 6.1 Not responding to the publishing the AMR

In responding to this consultation the views of the Council will feed into the plan making process. There are not considered to be any appropriate alternative options.

7 Background papers

- 7.1 The Leicester City Reg 18 Local Plan and supporting documents are available via their consultation portal. <https://consultations.leicester.gov.uk/sec/draft-local-plan/>