

City of Leicester Local Plan 2020 to 2036 - Draft Plan for Consultation, March 2020

Leicestershire County Council – Detailed comments

Chapter	Page No.	Policy Ref. / Para. No.	Comments
Overall Plan	Overall Plan	Overall Plan	<p>The Strategic Growth Plan (SGP) approved in 2018 provides the long-term vision and framework for the emerging new Local Plan for the City, and for other emerging Local Plans in Leicestershire.</p> <p>It recognises that Leicester has a pivotal role to play and that it should develop its role as the ‘central city’ supporting the market towns and rural areas around it. More jobs, leisure, arts, culture and entertainment facilities are envisaged within the City Centre. The strategic regeneration area along the Waterside will develop as a mixed use area, extending the economic opportunities available within the centre of the City, but balancing new jobs with the need for new homes.</p> <p>Growth in the City needs to be done in such a way that it makes full use of existing services and infrastructure. Also by providing more homes close to jobs in the City Centre and other employment centres development pressures will be relieved in other parts of the surrounding authorities.</p> <p>The SGP is referred to in the draft Local Plan, informing the policies and proposals within it. Further direct reference to the SGP is sought to embed and strengthen further the role the City performs for the whole Housing Market Area (HMA), specifically in the vision, objectives and policies within the Strategy for Leicester, and specifically on housing and employment.</p> <p>The County Council supports in principle the work that is being undertaken by Leicester City Council to put in place a new, up to date Local Plan, including the development of a transport evidence base to underpin the Plan. The County Council and County Highway Authority (CHA) has an interest in seeing the Plan successfully adopted and will seek to continue to work with Leicester City Council where possible/appropriate to achieve this. It is considered that an up to date adopted Plan represents the best</p>

		<p>way to seek to manage the future growth of the City and the impacts that this growth may have (directly or indirectly) on Leicestershire’s transport system and is in the best interests of delivering long-term growth more widely across Leicester and Leicestershire.</p> <p>The County Council recognises that options for the City of Leicester to meet its own needs, in respect of housing, are significantly constrained. Whilst recognising this, equally the County Council will expect the final Local Plan to provide a robust policy basis for dealing with the cumulative and cross-boundary impacts of growth, including where this impacts on Leicestershire’s transport system and other infrastructure it provides. It is also important that the final Plan acknowledges the important role that the City serves for Leicestershire residents and that as appropriate it contains robust policies that seek to help maintain and enhance (transport) connectivity for county residents to services and facilities within the City of Leicester.</p> <p>(NB: The matters highlighted in the above paragraph are raised on a number of occasions in comments on particular aspects of the draft Plan. The County Council would welcome the opportunity to discuss and agree which of these draft Plan aspects might be appropriate to revise and update to provide the necessary robust policy basis it is seeking.)</p> <p>The CHA welcomes Leicester City Council’s ongoing commitment to undertaking transport evidence work to build on the Transport Infrastructure Assessment (TIA). Flowing from that it remains committed to working with Leicester City Council to understand: the impacts of the growth of the City of Leicester across the Housing Market Area’s transport system; the infrastructure and measures required to enable and mitigate the impacts of that growth; and to ensure that there is a robust policy framework in place to underpin the development, funding and delivery of such infrastructure/ measure, especially where that might be necessary to deal with cumulative and/or cross-boundary impacts.</p> <p>The remainder of the CHAs comments reflect these general points and are intended to be constructive in helping to develop the final Plan and achieving its successful adoption.</p> <p>The phrase ‘Leicester Urban Area’ (LUA) is used variously throughout the draft Plan and is shown in a number of diagrams (most notably Diagram 01). In doing this, care needs to be taken not to create confusion in the readers’ mind or to give rise to misleading impressions. For example, in respect of highways and transport issues, the County Council’s adopted Passenger Transport Policy and Strategy</p>
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			<p>(PTPS) applies to areas of the LUA beyond the City boundary; reading of the text and policies in the Transport Chapter might give a different impression in terms of ambitions for passenger transport. Likewise, it might be misunderstood that there could be some form of ‘transport strategy’ for the LUA; whilst the CHA remains committed to working with Leicester City Council on highways and transport matters of common benefit/interest, it will nevertheless be developing its own Local Transport Plan that will cover all areas of the LUA outside the boundaries of the City of Leicester. The CHA would ask that the text for the final Plan be reviewed and additional clarifying text be added as necessary to minimise the risk of any potential confusion/misleading impressions.</p> <p>The Draft Local Plan was developed pre-Covid and has not acknowledged the rapid acceleration of existing trends and how this could affect the use of buildings across the city, i.e. increase in remote working, on-line retail, use of local economic centres and walking and cycling.</p> <p>Further observations:</p> <ul style="list-style-type: none"> • A development proposal map included within the document would be useful to provide readers with a context of where the development proposals are and identify likely cross boundary sites; • The spatial strategy diagram 2 on page 32 could be improved to enable the cross referencing of site allocations; • Information on proposed access and infrastructure is required for the sites to identify if/how they may be deliverable; and • Information of any site feasibility works should be included.
2. A Profile of Leicester: A Spatial Portrait	18	2.10-2.11	Refers to the need to reduce emissions from transport and new development but doesn’t include energy and heat infrastructure for existing housing which will also need to be addressed to reach net zero.
2. A Profile of Leicester: A Spatial Portrait	21	2.30	Support recognition of the River Soar and Grand Union Canal as in itself an important Green Infrastructure Network for wildlife and access to the Countryside. This is supported by Natural England, Canal & River Trust and other local authorities. There perhaps should be recognition that the River Soar is also one of the assets under threat from Climate Change suffering more frequent flooding and drought.
2. A Profile of Leicester: A	21	2.31	Should reflect the role of green spaces in supporting resilience to a changing climate e.g. cool havens in heatwaves

Spatial Portrait			
2. A Profile of Leicester: A Spatial Portrait	21	2.34	Welcome recognition of green spaces to health but specific reference to mental health could be added
3. Vision for Leicester	24	3.1 – The Vision	<p>The Vision is generally clear, aspirational and reflects dynamic nature of cities. Keen for further recognition that most residents and business in Oadby and Wigston Borough, and many residents and businesses in Blaby District, Charnwood Borough, Harborough District and to a lesser extent in Hinckley and Bosworth Borough are located within the built framework of Leicester.</p> <p>Emphasising the importance of ensuring for these communities, as well as those who live in the Leicestershire market towns and more rural settlements in Leicestershire, that the policies and proposals of the new emerging City of Leicester Local Plan seek to protect, enhance and create attractive and desirable places to live and work. This is in addition to the need for the City Centre to function well and effectively in the 21st century. Often this will relate to the function of more local urban centres, the quality of the local built and natural environment and the ability to access by sustainable modes other nearby communities as well as the City Centre.</p> <p>Whilst there is reference to a healthy, clean and just city in the objectives they are not explicit in the vision.</p>
3. Vision for Leicester	24	3.2 - Objectives	<p>The objectives outlined at Para 3.2 are generally supported given that they recognise the importance of meeting housing needs, promoting economic growth in addition to health and wellbeing and a commitment to combating climate change all of which align with the County Council’s strategic policy objectives and the Strategic Growth Plan which is seen as a primary driver to achieving growth across the HMA.</p> <p>It is suggested that an additional objective be included that reflects the role of the City of Leicester within the wider Housing Market Area (HMA) / Strategic Growth Plan, including the importance of maintaining and enhancing accessibility of services and facilities for residents of the county. This could be supplemented by additional evidence provided throughout the Plan, e.g. journey to work data.</p> <p>Despite reference to increased on-line shopping on page 20, 2.25 (and by association, deliveries) the transport objective omits to tackle freight and delivery traffic.</p>

3. Vision for Leicester	25	Policy VL01	Conformity to the NPPF is essential to achieving a sound local plan. Potential changes stemming from the Planning for the Future White Paper will need to be considered as the draft Local Plan advances through the plan preparation process.
4. Strategy for Leicester	27 to 40	Policies SL01 to SL06 – General Comments	<p>Policy SL01 outlines a framework for the delivery of development across the City. It demonstrates that the current Standard Method has been used in the determination of overall housing numbers and provides a breakdown of how the housing will be delivered including details of the level of shortfall that needs to be met within neighbouring authority areas. It is noted that further studies are ongoing to compliment the HEDNA (2017) in respect of housing mix.</p> <p>Policies SL02 – SL05 consider in greater detail the five strategic housing sites to be delivered as part of the plan. In respect of these sites no reference is made to constraints to delivery. For example, Policies SL04 – SL06, which are to deliver 57% of the housing from strategic sites, do not refer to the need for CPO powers to be considered for use to secure delivery of sites (see Appendix 4). Further, there is little or no evidence as to how any major infrastructure or mitigation measures would be delivered to facilitate development.</p> <p>Similarly, the draft Local Plan assumes that all the potential sites within the CDA are deliverable especially as it is recognised at Policy E07 that employment uses will be required to relocate. It is likely that the bulk of these sites will be brownfield which in itself introduces an additional delivery risk, not least in relation to viability, for which no allowance appears to have been made.</p> <p>In respect of the small sites detailed in Appendix 5 it is noted that a significant proportion comprise school playing fields, allotments, public playing fields, recreational assets or local areas of open space. Notwithstanding the likelihood that the loss of these assets will be resisted by the local communities they serve and the need for other consents (for example from the Department for Education), the development of such areas of land would be contrary to other plan policies including HW01 and OSSR02 without adequate alternative provision.</p> <p>Hence, It is concluded that a minimum of 20% of the housing needs to be met from within the City itself (excluding existing commitments) could be undeliverable or constrained within the Plan period. This would lead to an additional shortfall in housing supply of c.2,300 dwellings to be met elsewhere within the HMA increasing unmet needs to a figure in excess of 10,000 dws. Accordingly, the current figure of 7,742 dws needs to be regarded as a minimum, and provision made within the draft Local Plan, and the Statement of</p>

			<p>Common to Ground, to take account of the potential for further shortfalls in order to provide the flexibility that would support a robust approach to allocations across the HMA. Bearing this in mind it is most important to encourage the City Council to ensure strong delivery within the CDA, across the smaller sites and on the five strategic sites.</p> <p>The County Council recognises that options for the City of Leicester to meet its own needs, in respect of housing, are significantly constrained; there are very limited location options available to accommodate 'strategic sites'.</p> <p>Notwithstanding this, the County Council wishes to see the Plan strengthened in a number of respects:</p> <ol style="list-style-type: none"> 1) To ensure that the policies and text in this chapter explicitly reference the need for continued joint work with the County Highway Authority and other infrastructure providers at the County Council. 2) Building on the collaborative approach that the City Council is undertaking in its approach to transport evidence development, to include a policy(ies) that provide the basis for the assessment of the cumulative impacts of the strategic sites in the north western side of Leicester City, including with sites beyond the boundary of Leicester City as appropriate. 3) To include a policy(ies) that provide for the cross-boundary assessment and funding of transport measures required to enable and support growth. In this respect, it is important to note that the County Council would not foresee site promoters being necessarily responsible for dealing with such wider matters; rather the intention is that it would provide a policy basis for joint working to address cumulative impacts, for example as work on the South East Leicester Transport Strategy Area (SELTSA) has flowed from the development of the Harborough District and Oadby and Wigston Local Plans. 4) In respect of Policy SL06 General Hospital Site, to amend the policy and/or add additional supporting text to allow for potential contributions to SELTSA. <p>Additionally, it is surprising that policies SL01 to SL06 do not refer to sustainable transport provision; as a minimum it may be worth cross-referencing policies T01-T04 (as appropriate) to help amplify the strong sustainable travel credentials/opportunities associated with these sites.</p> <p>Notwithstanding the above points, the CHA reserves the right to make further comments on these strategic sites as and when they come forward through the Development Management process.</p>
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4. Strategy for Leicester	30	4.14	Suggest need to reassess demand for offices in the city centre post-Covid and the use of green spaces for economic development
4. Strategy for Leicester	31	4.21	The 'green infrastructure' as part of the City's active transport network is not sufficiently acknowledged here. The paragraph suggests a conflict although green infrastructure with active transport can support (and should be integrated into) sustainable growth and development.
4. Strategy for Leicester	34	Policy SL01	It is suggested that consideration be given to including a policy(ies) that deal with the cumulative impacts of the remaining 1486 homes. Some of these sites are sizable (50 to 100 dws) and the cumulative impact within an area (Inner, NW, NE etc used in Appendix 5) could be significant for infrastructure provision.
4. Strategy for Leicester	35 & 36		Welcome the recognition that developments must have "due regard to the surrounding Green Wedge" to preserve connectivity of green spaces.
4. Strategy for Leicester	36 to 40	Strategic Sites	The County Highway Authority welcomes the work undertaken by Leicester City Council to assess the transport impacts of these sites and will continue to work collaboratively on taking forward any further work to develop the necessary enabling/supporting transport infrastructure that is required in the County.
4. Strategy for Leicester	36 to 39	Policies SL02 to SL05 (Strategic Sites 1 to 4)	Grouped as they are in the northwest quadrant of the City of Leicester and falling broadly within the A46 Corridor – albeit without direct access to that road – the transport impacts of these sites are likely to interact with both existing and emerging planned growth in neighbouring areas, particularly in Charnwood and Blaby. It will be important to ensure that a joined-up approach is taken to identifying the potential cumulative transport implications of growth in and around this area; ensure robust policies are included in the final Plan to deal with such cumulative impacts and to provide a firm foundation for securing funding from developments to help to deliver the necessary mitigating transport measures; and to put in place a strategy to underpin the securing of any necessary publicly funding (full or in part) towards those measures.
4. Strategy for Leicester	36	Policy SL02	Specific to Policy SL02, it is recognised that part of the site lies within Blaby District. Whilst the plan assumes the total allocation is included within the City's housing trajectory, the plan needs to make clear that the unmet need is net of the housing delivered from outside the city boundary on this site.
4. Strategy for Leicester	38	Policy	The policy should ensure that development in this location does not prejudice any potential future

Leicester		SL04	<p>proposals/aspirations for upgrading the A46 Leicester Western Bypass, for instance arising from studies led by Midlands Connect.</p> <p>The A46 Leicester Western Bypass is a significant barrier to connectivity with the rest of the Leicester Urban Area; however, the policy as written is silent on how this will be overcome. Based on experience of other local plans and strategic site allocations with similar connectivity considerations, the final policy may need to be more explicit on how this will be addressed.</p>
4. Strategy for Leicester	39	Policy SL05	The CHA is aware of the potential for this allocation to potentially form part of a more comprehensive development embracing land beyond the city boundary in Charnwood and Blaby. It would be helpful if the policy and/or accompanying text were to provide for this allocation coming forward as a part of a more comprehensive development.
4. Strategy for Leicester	40	Policy SL06	Given its location, development of this site would potentially need to make a contribution towards the delivery of measures within the South East Leicester Transport Strategy Area.
5. Housing			<p>Regarding education, discussions have commenced with Leicester City Council regarding the cross-boundary implications likely in relation to 4 of the 5 large housing sites identified in the plan. It is important that these continue as housing allocations look likely to be made in adjoining sites in Leicestershire by districts.</p> <p>It is important that the Strategy recognises the value of good schools to supporting sustainable communities and promoting strong progression routes to Further/Higher education and employment.</p> <p>The need for additional school places arising from each development should also be adequately recognised and ensure that new schools or expanded schools in each locality are provided. This will help alleviate the pressure on out of catchment demand for places on County schools placed close to the City boundary.</p> <p>The County Council supports the development of the proposed secondary school within the proposed East of Ashton Green strategic site allocation, recognising that the development of this school will help mitigate City pupils attending County schools.</p>
5. Housing	45	Policy	See comments in Section 4 above

		Ho01	
5. Housing	46	Policy Ho02	It is noted from Table 1 that the anticipated delivery from unallocated and windfall sites will deliver 150 houses per annum based on previous delivery levels. However, there appears to be no evidence to support this assumption in the evidence base, further explanation required.
5. Housing	47	Policy Ho03	Whilst the overall housing mix is seen to meet the assessed need across the plan area the different densities detailed in Policy Ho05 requires that the mix within individual sites and the CDA be reflected in the policy requirements of those areas. The delivery of homes to meet the needs of the ageing population and those with special needs is welcomed, but there will need to be clarity as to where such housing is delivered in order that shortfalls in specialist housing can be translated into the Statement of Common Ground.
5. Housing	48	Policy Ho04	The plan details a target level of 30% affordable housing on all major schemes without defining what constitutes a major scheme although it is noted that current affordable housing policy applies to all housing developments of more than 15 units. Whilst the policy suggests that there would be a degree of flexibility in delivery rates to reflect the viability of individual sites it is considered that the plan needs to be specific in this regard in order to secure the delivery of an adequate housing supply. Again, the implications of under supply needs to be addressed in relation to the wider HMA.
5. Housing			Note the housing trajectory on p213 indicates for the five strategic sites the delivery of significant numbers of new dwellings from 2024/2025 through to 2032/2033. To enable this to happen continued and closer working with partners will be required.
6. Climate Change and Flood Risk	59	Policy CCFR01	<p>It is suggested that the “Energy and Carbon Reduction” section of the policy should also include the provision of electric vehicle charging infrastructure as part of new developments.</p> <p>For balance, it is suggested the policy should also refer to making developments sustainable from a transport perspective more generally; as a minimum it may be worth cross-referencing policies T01-T04 (as appropriate).</p> <p>How will the requirements of this policy be assessed and what minimum standards will apply?</p>

			Support and welcome the climate change policies CCFR01, CCFR02
6. Climate Change and Flood Risk	59-61		This chapter only refers to the Strategic Green Network in the City & urban area. It recognises the importance of networks in the Leicester Urban area that feed into the City Networks. The plan should refer to how these support wider strategic green networks as part of the partnership with the Strategic Growth Plan especially as the impacts of Leicester’s need for homes will impact areas outside the city. The networks are based on land ownership and a map showing Ecological permeability and physical connectivity could be incorporated into the evidence base to ensure that developers understand the impacts on wider strategic activity. The proposed changes to land use encouraged by the Environment Bill will need to be considered for Urban fringe and wider rural- urban links.
6. Climate Change and Flood Risk			<p>The communities of Leicester are poorly served by accessible natural greenspace, particularly to the south of the city. There is potential to combine action for biodiversity with the provision of increased access to natural greenspace for both urban and rural communities through joint working between the County and City council.</p> <p>Provision of large-scale accessible natural greenspace serving the south and east of the city could be investigated further. There are opportunities within the Leicester Urban Area to provide for this and follow the River Soar corridor.</p>
8. Delivering Quality Places	73	Policy DQP01	<p>Section 2 (Built Form), bullet point (c) – it is suggested that the text should be amended to reflect that this will often be cross-boundary (especially with regards to the proposed strategic allocations) and require a joined- up approach with the County and Neighbouring District Councils:</p> <p><i>“Consider development comprehensively and in a co-ordinated way, <u>across administrative boundaries where necessary</u>, to enable the efficient and most effective use of land to allow a sustainable amount and mix of uses to support local facilities and transport networks – across multiple sites where possible.”</i></p> <p>Section 7 (Resources and Lifespan), bullet point (c) – it may also be worth referring to changing travel behaviour/technology with a particular emphasis on being ready for a future switch to electric vehicles.</p> <p>How will this policy work with CCFR01?</p>

8. Delivering Quality Places	79	Policy DQP04	<p>Will this policy also take account of the changing climate and how this will affect landscape design and the plants etc that will/will not be able to survive in the changing climate?</p> <p>Would like to see some reference here to the environmental aspects of design – relating to the use and sourcing of sustainable materials etc and the associated cost implications.</p>
8. Delivering Quality Places	84	8.33	Lighting and media screens should maximise efficiency and support the net zero carbon targets.
9. Central Development Area (CDA)	88	Background	The Plan should be strengthened to stress the importance of the role of Leicester City within the wider Housing Market Area (HMA) / Strategic Growth Plan, including the importance of maintaining and enhancing accessibility of services and facilities in the CDA for residents of the wider Housing Market Area.
9. Central Development Area (CDA)	90	Policy CDA01	The County Highway Authority wishes to see an additional criterion added to the policy in respect of maintaining and enhancing accessibility of services and facilities within the CDA to residents of the wider Housing Market Area.
11. Culture and Tourism			Reference needs to be made to the Leicester and Leicestershire Tourism Growth Plan, given the strong interlinkages and complete tourism offer that Leicester and Leicestershire presents and is looking to evolve further. The Leicester and Leicestershire Tourism Growth Plan visualises the area as a single, integrated visitor destination where more tourism growth, more visitors, more economic value and more jobs can be achieved. Specific reference needs to be made to it in the evidence, and it needs to inform the policies of the draft Local Plan; in particular, this chapter, the CDA chapter, Delivering Quality Places chapter, Town Centre and Retail chapter, Employment chapter and Transportation chapter.
11. Culture and Tourism	119	Policy CT04	The County Highway Authority recognises the important role that current Park and Ride sites play in helping to address traffic issues within and around the City of Leicester. But, any proposals for new sites would need to be founded on an evidence-based assessment of options/needs, demonstrating a clear business case and avoiding the need for additional financial costs to local authority budgets. (See also comments on Policy TR04.)
12. Employment			The further review of the Employment Land needs of the City is welcomed and should take account of the revised working practices that are currently being adopted by businesses and changes to the Use Classes

			<p>Order.</p> <p>With regards to the draft Local Plan provisions it is noted that to 2031 there is a requirement for an additional 45 hectares of land to meet the needs for Light Industrial and industrial sectors. Further it is proposed that future strategic distribution needs be met outside the City. It is understood this will be informed by an emerging L&L Strategic Warehousing study.</p> <p>The likely potential unmet need of 23 ha of employment land (2019 to 2036) is also noted. Work is currently being undertaken by authorities in L&L, including the County Council, as part of Duty to Co-operate, on a Sustainability Appraisal to assess options for where this unmet need could be appropriately distributed across L&L. This will inform a statement of Common Ground setting out how any unmet need from Leicester will be distributed amongst the HMA authorities, which is intended for completion in early 2021.</p> <p>A wide range of strong employment policies are set out in the draft Local Plan, which include four new types of 'Economic Development Areas' (General Quality, High Quality, The Science Park and Neighbourhood).</p> <p>An EZ specific policy was anticipated, thought note partially covered by Policy E04 for Pioneer Park.</p> <p>P 122, the LLEP economic recovery plan needs to form part of the evidence base moving forward for the draft Local Plan and future evidence work being undertaken by the L&L strategic planning partnership.</p> <p>The creative Industries, the Cultural Quarter (Policy E.06), and the development potential of this area which is set out in the St George's Character Area (Ch9, CDA) is supported.</p> <p>Support is also given to Policy E.07 on Employment: Support Strategies, though it is noted at Policy E07 c.) the plan indicates that employment uses will be relocated from within the CDA without an indication of the quantum of land likely to be involved.</p> <p>Support for the continuation of the 'Other Regeneration Areas': Abbey Meadows and Pioneer Park, Waterside, University of Leicester and Leicester City Football Club.</p>
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			<p>Note (p128) three new strategic employment sites are proposed, two as part of wider strategic sites at Western Golf Course and east of Ashton Green, and the third at Beaumont Park. With this new provision to the employment land portfolio is there scope for some 'general' employment to be released for housing with further employment requirement possibly located in surrounding districts?</p> <p>Understand rate of change has been accelerated by the current COVID-19 pandemic, such as acceleration in online retail, and related implications such as an increase in demand for floorspace for fulfilments centres, differing logistics requirements, use of buildings across the City. Do policies need to be adjusted?</p>
13. Town Centre and Retail	144	The City Centre	The Plan should be strengthened to stress the importance of the role of Leicester City within the wider Housing Market Area (HMA) / Strategic Growth Plan, including the importance of maintaining and enhancing accessibility of services and facilities in the city centre for residents of the wider Housing Market Area.
13. Town Centre and Retail	145-146	Policy TCR03	<p>The County Highway Authority wishes to see an additional criterion added to the policy in respect of maintaining and enhancing accessibility of services and facilities within the city centre to residents of the wider Housing Market Area.</p> <p>The reference to rail within the transport section of the Policy feels rather too narrowly drawn. For a City of its size and location, Leicester currently has very poor transport connectivity. In this respect, it is suggested that the policy is broadened to reference also how people travel to Leicester by rail (not just how they get from the rail station elsewhere). In particular, there appear to be opportunities here to tie in with business case work development that has been undertaken by Midlands Connect, especially in respect of direct rail services to Coventry; enhanced services to Birmingham; and the provision of an HS2 classic rail compatible link at Toton, opening up direct access to northern Cities such as Leeds.</p>
13. Town Centre and Retail			<p>Many shopping centres are seeing closures of mainly high street chains which occupy larger units that are becoming difficult to re-let. Smaller retail units tend to re-let quite quickly, possibly because they are cheaper to rent and attract transient hospitality businesses. In totality, there is considered to be less of a need for retail space.</p> <p>Also understand that the rate of change has been accelerated by the current COVID-19 pandemic, such as acceleration in online retail, and related implications such as an increase in demand for floorspace for</p>

			<p>fulfilments centres, differing logistics requirements, use of buildings across the City.</p> <p>Suggest the Retail Leisure Study considers and reflects this accelerated change.</p> <p>Para 13.4 refers to fosse Park and the extension currently under construction. Suggest the role of Fosse Park is underplayed, and it is wider than an adjoining authority issue, as Fosse Park has a wider than L&L sub region role, drawing in shoppers from further afield, in particular, Southern Nottinghamshire and Derbyshire, and eastern Warwickshire. This may change in the future with the accelerated move to online retail, but the appeal may remain albeit at a smaller level for shopping for comparison goods.</p>
14. Open Space, Sports and Recreation	161	Policy OSSR01	It is suggested that the policy should be clarified with regards to the provision of new transport infrastructure through green wedges, to avoid this becoming a potential barrier to infrastructure required to support growth and wider aspirations.
15. The Natural Environment	168		We recognise that the Biodiversity Action Plan is under-way and we would expect the work that is being led by the County Council supported by the Local Leicestershire & Rutland Wildlife Trust around Ecological permeability and connectivity to be utilised within the evidence base for the Biodiversity Action Plan.
15. The Natural Environment	168	15.1 Evidence base	<p>I would have thought reference should be made here to:</p> <ul style="list-style-type: none"> • The Strategic Growth Plan, including the evidence commissioned or undertaken, in particular, <i>The Landscape Sensitivity and Green Infrastructure Study for Leicester & Leicestershire</i> • <i>Leicester, Leicestershire & Rutland Landscape & Woodland Strategy 2001 (Amended 2006)</i> <p>I noted that the 6cs strategy was also not mentioned alongside the Woodland Strategy but then these may be too old and superseded by the Leicester Green Infrastructure Strategy and the City Tree Strategy. Clarification would be welcome.</p>
15. The Natural Environment	169		The chapter does recognise the opportunity mapping produced in the GI & Landscape Sensitivity Study produced for the Strategic Growth Plan. The policy should at least reference this document.
15. The Natural	169-170	Policy	Unclear as to whether the net gain requirement is in addition to the requirement to minimise harm to

Environment		NE01 & NE02	biodiversity. NE02 says 'Development should seek to provide a net gain in biodiversity' – is this not a legal requirement? (10% net gain). Seek to reads as if it is optional.
15. The Natural Environment		Policy NE03	Will this policy take account of the changing climate and how this will affect what green infrastructure will/will not be able to survive in the changing climate?
15. The Natural Environment			<p>Green infrastructure is crucial to health and well-being as well as being an important component of the natural environment.</p> <p>Green wedges are an established local planning policy tool in Leicester and Leicestershire, preventing the merging of communities, guiding development form, providing a 'green lung' into urban areas (including connecting to wider open countryside) and providing a recreational resource.</p> <p>Whilst it is desirable to retain them intact it is recognised that a review of green wedges needs to be undertaken from time to time to consider whether the strategic functions are being met and whether there is scope for release for development beyond that ordinarily permitted in green wedges. It is acknowledged that Leicester City Council has undertaken such a review and this has informed land release from existing green wedge designation.</p> <p>Support is given to a proactive approach to the provision of further green space, such as designation of further parks so communities can have access to open green space, particularly in the light of the potential loss of existing green assets for future development.</p> <p>As the outer areas of the City are extended further through the delivery of planned growth, existing and proposed communities will be located further from either formalised green space or access to the open countryside. The mental health benefits have been emphasised during the recent COVID-19 pandemic, and this renewed recognition of the importance of green space being available locally needs to be factored into future planning.</p> <p>Suggest a greater profile in the draft Local Plan for the River Soar and Grand Union Canal waterway corridor. It forms a very striking asset which extends into Leicestershire to the south and north of the City, with value from environmental, recreational, leisure, tourism and regeneration perspectives.</p>

16. Transportation	173 to 194	Overall chapter content	<p>The County Highway Authority (CHA) recognises that it is for Leicester City Council to frame its own transport policies that meet its own objectives and needs of a constrained and congested City. The CHA will continue to work with Leicester City Council to support its initiatives where appropriate (e.g. Transforming Cities Fund projects).</p> <p>Notwithstanding the above and reflecting comments on other aspects of the draft Plan.</p> <ol style="list-style-type: none"> 1) Care needs to be taken to avoid the risk of creating confusion / misleading impressions in the use of the term 'Leicester Urban Area'. The CHA would ask that the text for the final Plan is reviewed to minimise such risks in respect of the extent of intended transport strategies and applicability of transport policies. 2) The chapter lacks any particular narrative or structure in respect of dealing with the impacts of growth; (neither does Chapter 18 Development and Infrastructure). Specific examples are given in comments below, but as an overall comment it is suggested that the Plan should be strengthened so that policy(ies) clearly identify and provide a robust basis for dealing with: <ul style="list-style-type: none"> • Required infrastructure/measures to enable/mitigate the impacts of specific sites; and separately • the cumulative impacts of growth, including cross-boundary. <p>In doing so, consideration needs to be given to work that is likely to flow on from the development of the Plan, including the need for additional study work and strategy development. The CHA would wish to work with Leicester City Council to discuss the need for and nature of such further work, and how that might be reflected in the final Plan. (An example might be the narrative included in the adopted Melton Local Plan around the development of a Melton Mowbray Transport Strategy to enable the town's strategic growth.)</p> 3) The text and polices should be reviewed and strengthened to ensure that the important role of Leicester in providing services and facilities to the wider Housing Market Area is properly reflected. 4) The Local Plan could be strengthened to reflect the objectives of the Leicester and Leicestershire Rail Strategy to significantly improve the City of Leicester's rail connectivity to cities elsewhere, particularly in the north and south of England. It perhaps surprising, too that HS2 Phase 2b is not referenced. This overall comment is reflected in comments on specific aspects of this chapter.
16. Transportation	174	16.1	As a point of clarification, is bullet point three in fact supposed to reference the Leicester and Leicestershire Strategic Transport Priorities document?

			It is suggested the Leicester and Leicestershire Rail Strategy should also be included in this list.
16. Transportation	174	16.2 to 16.3	It is suggested that the Background section could include, with reference to the Leicester and Leicestershire Rail Strategy, a short piece of text on why improved rail connectivity is important for the City of Leicester. For example: <i>“16.4: More widely, improving the city’s rail connective to cities in the West Midlands and Northern England – including through opportunities arising from HS2 Phase 2b – will bring significant economic benefits and help to reduce the carbon impacts of long distance, inter-city travel to and from the City.”</i>
16 Transportation	174	16.3	The sentiments of this paragraph are supported; the CHA would wish to see it reflected more widely through the Plan, in line with its other comments (including within the Transport Chapter) relating to recognising the Housing Market Area wide role of the City of Leicester.
16. Transportation	174	16.4 to 16.7	It is suggested that this text is strengthened to highlight how the ‘Transport Strategy for Leicester’ will consider how residents from the wider Housing Market Area (HMA) travel through the City of Leicester to gain access to services and facilities within it. In this context, travel by car for people in the wider HMA will continue to be an important mode of travel.
16. Transportation	175	After 16.7	Suggest that it would be beneficial to include a short piece to cover HS2. For example: National Context <i>“The constructions of HS2 will transform the UK’s rail connectivity. Whilst Phase 2b will not serve the city, nevertheless it will open up significant opportunities to improve Leicester’s rail connectivity to other major cities across the UK.”</i>
16. Transportation	176 and 177	16.9 and 16.16 and Diagram 16	References to new City Local Transport Plan, bus services serving the ‘Leicester Urban Area’ (LUA) and a Bus Strategy in the context as quoted is an example of how confusion about the applicability of respective policies and strategies could be created in the mind of the reader of the Local Plan, i.e. it might confuse them about the applicability of the County Council’s adopted Passenger Transport Policy and Strategy in areas of the LUA beyond the boundaries of Leicester City.

			In this instance it may be beneficial to include additional text reiterating those specific areas of the LUA that are beyond the city boundary and illustrating how the LUA bus network does not respect the city/county boundary creating interdependencies between city and county passenger transport policy, highlighting the need for joint working between the City and County to ensure that any planned enhancements to cross-boundary services are effective and align with both city and county policy.
16. Transportation	179 and 180	16.22 to 16.32	Suggest it may be worth adding text to recognise that there may be a need for “cross boundary” cycling and walking connections (over and above the city’s own proposals/strategies/LCWIP), which will need to be considered jointly by the CHA and Leicester City Council as part of future study work/strategy development.
16. Transportation	181 and 187	16.38 to 16.40 and Policy T04	The County Highway Authority (CHA) recognises the important role that current Park and Ride sites play in helping to address traffic issues within and around the City of Leicester. But, any proposals for new sites would need to be founded on an evidence-based assessment of options/needs, demonstrating a clear business case and avoiding the need for additional financial costs to local authority budgets. The CHA would wish to see the Plan to be reviewed to reflect this.
16. Transportation	182	16.41	Suggest adding wording to clarify that some transport interventions may need to be outside the city boundary to address the spill-over impacts of the plan and associated interventions within the city e.g: <i>“Modal shift to sustainable transport options, together with localised improvements to support resilience of the main radial and orbital routes, is therefore key to managing growth in the city <u>and addressing its impacts within and beyond the city’s administrative boundaries.</u>”</i>
16. Transportation	184 to 188	Policies	Suggest inclusion of a specific rail policy. For example: <i>“Policy T0x Rail The Council will continue to work closely with partners to improve rail connectivity for the City, including to:</i> <ul style="list-style-type: none"> • <i>seek to make the most of the opportunities arising from delivery of HS2 Phase 2, including provision of a classic rail compatible link at Toton;</i> • <i>seek delivery of further upgrades to the Midland Main Line;</i> • <i>achieve the earliest possible delivery of projects identified by Midlands Connect, including provision of direct rail services to Coventry and significant enhancements to Birmingham services;</i>

			<ul style="list-style-type: none"> • <i>achieve the earliest possible delivery of upgrades to the track network in the vicinity of Leicester Station and the provision of an additional platform at the Station.</i> <p>There would also appear to be opportunities to reference the Station Masterplan and its delivery.</p>
16. Transportation	184	Policy T01	<p>Whilst the County Highway Authority is supportive of the sentiments of this Policy, it does not consider cumulative impacts; cross-boundary impacts; nor recognise the importance of wider Housing Marker Area residents being able to travel through the City of Leicester to access services and facilities within in it.</p> <p>Will this policy support the provision of on-street charging infrastructure and possible future smart charging solutions?</p>
16. Transportation	185	Policy T02	<p>Welcome and support Climate change and air quality policy</p> <p>Will the requirement to for new developments to make provision for electric and low emission vehicles also include refurbishments?</p>
16. Transportation	186	Policy T03	<p>Whilst the County Highway Authority is supportive of the sentiments of this Policy, it does not consider cumulative impacts; cross-boundary impacts; nor recognise the importance of wider Housing Marker Area residents being able to travel through the City of Leicester to access services and facilities within in it.</p> <p>For buses, it is suggested that the policy would benefit from an additional objective of ensuring that any new bus services/route alterations provided to serve development are financially viable beyond the initial period of developer subsidy/contributions. This particularly applies to large sites close to the city boundary, which are most likely to require dedicated passenger transport provision, and to have additional transport impacts beyond the city boundary if this provision diminishes after any developer subsidies end.</p>
15. Transportation	187	Policy T05	<p>Not British Waterways now the river freight is managed by Canal & River Trust a partner in the River Soar and Grand Union Partnership.</p>
16. Transportation	188	Policy T06	<p>As a minor point, the Policy title does not really seem to reflect its content. Additionally, the Policy does not consider cumulative impacts or cross-boundary impacts.</p>

16. Transportation	188	Parking aims and objectives	<p>It is suggested that an additional aim/objective be included that reflects the role of the City of Leicester within the wider Housing Market Area (HMA) / Strategic Growth Plan, including the importance of maintaining and enhancing accessibility of services and facilities for residents of the county. In this context, travel by car for people in the wider HMA will continue to be an important mode of travel, requiring the provision of appropriate levels of car parking.</p> <p>Additionally, it is suggested that the City's proposed parking aims, objectives and policies should be considered in conjunction with those of the County and neighbouring District Councils, to ensure a coherent approach to parking policy/management across the Leicester Urban Area as a whole. This is particularly important with regards to large sites located close or adjacent to the city-county boundary, where the potential for significant cross-boundary interaction is greatest.</p>
16. Transportation	190	Part B) Parking NOT associated with new development	<p>It is suggested that this part of the Plan is amended also to acknowledge the parking needs of those who might need to travel into the City (and park) from across the wider Housing Market Area.</p>
16. Transportation	192 and 193	Policy T07	<p>It is suggested that section C) of the Policy should be amended to include a criterion relating to the taking into account of any parking demand associated with residents of the wider Housing Market Area accessing services and facilities within the City of Leicester.</p> <p>The application of this policy will need to be considered in conjunction with parking policy/provision in the surrounding areas of the County/Districts, to ensure a coherent approach to parking policy/management across the Leicester urban area as a whole. This is particularly important with regards to large sites located close or adjacent to the city-county boundary, where the potential for significant cross-boundary interaction is greatest.</p>
16. Transportation	194	Policy T08	<p>Welcome and support the Supporting Low Emission Vehicles policy</p> <p>Will the 5% install and 25% future install requirements be enough in light of government proposal to move the ban on petrol and diesel cars to 2030?</p>

			Will this policy have scope to deal with other future zero carbon fuels such as hydrogen?
16. Transportation			<p>Note reference within the draft Local Plan to Local Transport Plan being prepared for the City; though no reference to the emerging Strategic Transport Priorities which will inform future transport provision in the City and County.</p> <p>In addition to the City Centre, all County and City residents need to be able to access other service destinations, in particular the main hospitals with relative ease, speed and by a range of sustainable modes. It is understood Glenfield Hospital and the Leicester Royal Infirmary are to be retained as main hospitals with Leicester General retained as a local hospital serving the east of the City. Maintenance of routes and accessibility by a range of sustainable modes of transport need to be secured and retained in the longer term as further planned growth is built out.</p>
17. Future Minerals and Waste Needs	198-199	FMWN01/ FMWN02	<p>With regard to FMWN01 (new and existing waste uses) states that “applications for new, and existing to existing facilities, will be assessed against the following criteria: a) There is a proven local need for a facility to process an identified waste stream(s);”. However, the National Planning Policy for Waste states that when determining waste planning application, waste planning authorities should only expect applicants to demonstrate the quantitative or market need for new or enhanced waste management facilities where they are not consistent with an up-to-date Local Plan.</p> <p>This is also the case for criteria a) of Policy FMWN02 (End of Life Vehicles).</p>
18. Development and Infrastructure	202	18.4 and 18.5	The sentiments of paragraph 18.4 are supported; in line with the County Highway Authority’s comments on other aspects of the draft Plan, joint working and dealing with cross-boundary impacts of growth are matters where the Plan should be strengthened in its final version. It is suggested that reference to the ‘Leicester Urban Area’ in 18.5 be amended to read ‘wider Housing Market Area’.
18. Development and Infrastructure	204	Policy DI01	Note reference to monitoring fee on p204, Policy D101 Developer Contributions and Infrastructure for the monitoring of developer contributions, however the Policy does not consider cumulative impacts nor cross-boundary impacts.

18. Development and Infrastructure			Please see related comments relating to education in Chapter 5.
18. Development and Infrastructure			Within Development and Infrastructure would also anticipate reference to Superfast Broadband and 5G as a requirement within new residential and commercial development.
19. Neighbourhood Planning	206	Policy DQP07	States Policy DQP07 (which is Recycling and Refuse storage) does not need to be taken into account when preparing neighbourhood plans. However, many neighbourhood plans we have seen do take Recycling and Refuse storage into account. What is the reasoning behind this?
19. Neighbourhood Planning			The Plan does not seem to acknowledge the new national Resources and Waste Strategy (2018).
19. Neighbourhood Planning			The Plan assumes continuing growth of waste. It is true that there may be growth following an increase in residents in the city, however, waste prevention, reuse and recycling measures will continue to work to help mitigate this growth. This should be taken into account.
19. Neighbourhood Planning			<p>In Leicestershire we provide proactive support for communities to prepare Neighbourhood Plans. In Leicestershire by January 2020 there had been 38 neighbourhood plans made and 85 in preparation, demonstrating good take up by communities of the preparation of neighbourhood plans. By a community coming together and preparing a neighbourhood plan it ensures that the local community can inform the Local Plan, rather than a select number of strong voices from a community.</p> <p>We would encourage Leicester City to support the preparation of Neighbourhood Plans, could be particularly constructive in the designation of local green space, understanding which local green spaces are particularly valued by local communities. In addition to preferred locations for planned growth the Planning White Paper has also indicated local communities articulating consensus in their locality regarding design preferences in neighbourhood plans in the future.</p>
Appendices	227	Parks and	Watermead Park is not on the list – should it be?

		Gardens	
Supporting documentation <i>Infrastructure Assessment with Infrastructure Delivery Schedule</i>			<p>Given that transport is not yet properly incorporated into the Infrastructure Assessment at present, as the document itself acknowledges, the County Highway Authority (CHA) is not in a position to respond to the particular consultation questions posed in respect of this supporting document.</p> <p>However, the CHA does have some general comments at this time:</p> <ol style="list-style-type: none"> 1) The document does make some useful references to the characterisation of infrastructure ; cross-boundary impacts; and the use of Leicester’s infrastructure not being confined to City residents that chime with CHA’s comments on the draft Plan and that might provide a useful basis for strengthening the Plan to address the CHA’s comments. 2) The CHA remains committed to continuing to work with Leicester City Council to understand: the impacts of the growth of the City of Leicester across the Housing Market Area’s transport system; the infrastructure and measures required to enable and mitigate the impacts of that growth; and to ensure that there is a robust policy framework in place to underpin the development, funding and delivery of such infrastructure/ measure, especially where that might be necessary to deal with cumulative and/or cross-boundary impacts. <p>Additionally, it is noted that the estimated total cost of transport measures quoted in this document (£280.6m) is different to that quoted in the Transport Infrastructure Assessment (£300.5m)</p>
Supporting documentation <i>Transport Infrastructure Assessment (TIA)</i>			<p>Overall this document appears to primarily focus on impacts and infrastructure within the boundaries of the City of Leicester. Whilst it would not be appropriate for the County Highway Authority (CHA) to comment on particular conclusions reached in respect of matters that are considerations for the City Highway Authority, nevertheless the CHA does have an interest in understanding how transport measures proposed within the city could themselves have ‘spill-over’ implications for the county network that would need to be understood and addressed as necessary.</p> <p>Beyond that, the TIA does acknowledge likely wider impacts of growth within the City of Leicester, including beyond its boundaries. Whilst it also highlights some of the wider initiatives already being pursued by other bodies (e.g. Midlands Connect) the TIA does not as yet seek to demonstrate inter-dependencies between such initiatives and the future growth of the City of Leicester (nor the meeting of its unmet needs, especially in respect of housing).</p>

			<p>The CHA welcomes Leicester City Council’s commitment to undertaking further transport evidence work to build on the TIA. Flowing from that it remains committed to working with Leicester City Council to understand: the impacts of the growth of the City of Leicester across the Housing Market Area’s transport system; the infrastructure and measures required to enable and mitigate the impacts of that growth; and to ensure that there is a robust policy framework in place to underpin the development, funding and delivery of such infrastructure/ measure, especially where that might be necessary to deal with cumulative and/or cross-boundary impacts.</p> <p>Given the further evidence work, it is likely that the current estimated total cost given in the TIA for transport infrastructure is likely to increase.</p>
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