

MATTER 3: AMOUNT AND DISTRIBUTION OF DEVELOPMENT

Whether the Amount and Distribution of Development is positively prepared, justified, effective and consistent with national policy?

Policies DS01, DS02, DS03, DS04, DS05, SA01 and AP01 to AP05

Issue 1: Spatial Strategy

Q2. Is the spatial strategy as set out in Strategic policies DS01 to DS05, and elsewhere in the Plan, an appropriate strategy, taking account of reasonable alternatives, and based on proportionate evidence?

The city council welcomes that policy DS01 seeks to prioritise development in settlements adjoining the Leicester Urban Area (LUA) by placing them in Tier 1 of the settlement hierarchy, as outlined in Table 1 of the submission version of the local plan. This is consistent with the principles of sustainable development and the NPPF.

However, reasonable alternatives have not been sufficiently considered in the emerging local plan. In particular, the Scraftoft North Strategic Development Area (SDA), which is a current allocation in the adopted Harborough Local Plan 2011-2031, is not proposed to be carried forward as an allocation in the emerging local plan. This is difficult to comprehend as it is a large site within the LUA allocated for 1,200 dwellings, a two-form primary school, and a neighbourhood centre. It is therefore consistent with the overall development strategy for Harborough District, which includes delivering the homes needed, “focusing development in sustainable locations with access to services and opportunities for sustainable travel”, and with the settlement hierarchy.

The reason for rejecting the Scraftoft North SDA is provided in both Appendix 2 of the Site Selection Methodology (February 2025) (PRE-NLP 5) and Appendix E of the Sustainability Appraisal (S-NLP 3) as follows: “The site is not developable within the Local Plan period”. Proportionate evidence for how the council has reached this conclusion has not been detailed. The council should provide robust justification for not carrying forward a current allocation for development, which was tested as part of the examination process for the adopted local plan and found to be sound.

Furthermore, the reason for rejection is contradicted by the fact that an outline application has been submitted to Harborough District Council for development of up to 190 dwellings on the western portion of the site, with the express intention that this is to be Phase 1 of a comprehensive development of the entire SDA. The submission of the outline application confirms deliverability of the site.

In summary, the city council is strongly of the view that the Scraftoft North SDA should be re-considered as an allocation for development in the emerging local plan, especially in light of the recent outline application, and if evidence supports its re-allocation, then it should be included in the plan through Main Modifications.

Issue 4: Leicester City's Unmet Need

Q1. The Plan's housing requirement includes an allowance for Leicester City's unmet need until 2036. This is made up of a requirement above LHN of 123 homes per annum 2020-2036 based on evidence in the Housing Distribution Paper (June 2022) [HSG-NLP3]. What is the robust justification for this approach?

The Housing and Economic Needs Assessment – Housing Distribution Paper (June 2022) (HSG-NLP 3) outlines the comprehensive evidence and justification for the declaration of an unmet need by the city council and for the re-distribution of that unmet need amongst the other Leicestershire authorities up to 2036. The re-distribution proposed in the June 2022 Housing Distribution Paper was agreed by all Leicester & Leicestershire authorities in the Statement of Common Ground relating to Housing and Employment Land Needs (June 2022) (SCG-NLP 3). Leicester City Council's declaration and re-distribution of its unmet need, as well as all supporting evidence for it and other relevant documentation, was scrutinised during examination of the Leicester Local Plan 2020-2036 and was found to be sound.

Q2. Should the Plan's housing requirement include provision for unmet need beyond 2036? Has Leicester City's unmet need beyond 2026 been quantified through the local plan process? In the absence of robust evidence justifying Leicester City's capacity, is there robust evidence to support such an approach?

As is stated in the Updated Housing Distribution Paper (November 2025) (HSG-NLP 11), it appears unlikely that Leicester will be able to fully meet its housing need beyond 2036. While the city council welcomes that Harborough District Council has agreed to take a proportion of the city council's unmet housing need up to 2036, an allowance of 560 dwellings (or 112 dwellings per annum (dpa) from 2036-2041) for unmet need or a proportion of the housing headroom (contingency) should be identified or specified and monitored to meet the city's unmet need for the period 2036-2041 based on the apportionment to Harborough District in the Updated Housing Distribution Paper.

Leicester City's unmet need beyond 2036 was not quantified through its local plan process because the recently adopted City local plan has a plan period up to 2036. No evidence on housing capacity was produced for the local plan that extended beyond the plan period end-date.

However, the Updated Housing Distribution Paper provides an estimate of Leicester's potential unmet need for the 2036-2046 period based on, firstly, estimates of longer-term supply informed by the city council's understanding of the potential contribution of different areas within Leicester and, secondly, estimates informed by an analysis of historical trends in brownfield development in the city.

This evidence for unmet need in the post-2036 period was considered robust enough to be included in the housing requirements of North West Leicestershire District Council, Blaby District Council, and Hinckley & Bosworth District Council in the proposed submission versions of their respective local plans. Each of these authorities has agreed to accommodate a proportion of the city council's unmet need for the post-2036 period. However, Harborough District Council has not agreed to accommodate the city council's unmet need for the post-2036 period. The city council considers that Harborough District Council should accommodate 112 dpa of the city council's unmet need for the post-2036 period, as apportioned to it in the Updated Housing Distribution Paper.