Leicestershire
Campaign to Protect Rural England

Charity Number: 1164985

LEICESTER AND LEICESTERSHIRE STRATEGIC GROWTH PLAN

Consultation

Comments by CPRE Leicestershire

May 2018

Contents

1. Introduction

1.1 The Campaign to Protect Rural England (CPRE) Leicestershire welcomes the chance to comment on the draft Strategic Growth Plan (SGP).

1.2 Last year we commissioned work to examine the Housing and Economic Development Needs Assessment (HEDNA), which is still being used to inform the plan, and that assessment is attached at Appendix B. We also considered how the HEDNA figures were being interpreted in local plans, in as much as that was known at the time, and expressed some concern about the inflation of housing numbers.

1.3 CPRE supports the principle of strategic planning where that adds value to local decision making so we are not against the development of such a plan. There are parts of the current document we support, such as improved rail services, but there are significant areas which cause us concern.

1.4 This report sets out our high level response. Answers to the consultation questions are appended (Appendix A) at the end but they need to be read in the light of our wider concerns.

2. Key Points – A summary of CPRE's concerns

2.1 The following key points are of concern to CPRE Leicestershire:

Process

- Lack of local engagement in the plan's development.
- Reliance on evidence which has not been subject to external scrutiny, such as Midlands Connect.
- Lack of detailed supporting evidence in advance of the consultation and particular concerns about the scope of the Transport Assessment.
- Lack of public examination (EIP) to test the evidence for the Strategy before it is adopted.

Timescales

- Adoption of 2050 timescale for identifying areas for development, despite the uncertainty about future needs and the requirements of Local Plans which do not involve such a long timescale.
- Assumption that current trends will continue beyond a reasonable timescale.

Proposals

- Reliance on housing numbers which exceed genuine demographic and economic need.
- Insufficient allowance for undesignated sites to come forward to meet housing needs.
- As a result, a risk that development will occur in areas of countryside at the expense of urban regeneration.

- Over-emphasis on large scale road building, particularly the A46 Expressway.
- Lack of detailed evidence considering the impact of these proposals on local roads, congestion and sustainable transport choices.
- Reliance on demand led evidence for large industrial and logistics site without an overall assessment of need across the West and East Midlands which could inform how much is genuinely required and will be taken up.
- Taking no account of large logistics sites proposed by the National Infrastructure Commission.
- Little detail on environmental, biodiversity and heritage protection.
- Risk that landscape and other designations will be treated as simply a constraint not an asset.
- A Sustainability Assessment which does not consider lower housing options and whose findings are based on questionable assumptions about future behaviour.
- A lack of rural proofing.

3. Process for Preparing the SGP Document

3.1 In considering the SGP process we appreciate that the Councils are currently restricted by Government Policy, in particular the lack of any Statutory Strategic Processes above the Local Plan level, but this may change given the emphasis in the NPPF consultation draft on Development of Strategic Priorities (paras 17-19) and the role for Mayors and groups of local authorities.

3.2 As it is, we are concerned about the implications of this process for local people and for interest groups such as CPRE. We are also concerned that up to this stage there has been a lack of engagement in the development of the plan outside the confines of officers and of the Member Advisory Group (MAG), comprising one elected member from each of the Leicestershire authorities.

3.3 What discussion there has been has largely been with business interests, such as the Leicester and Leicestershire Local Enterprise Partnership (LLEP), and other unaccountable and unelected bodies. The result is a one-sided plan, which does not consider sufficiently alternative strategies for development or address fully the negative impacts of the strategy.

3.4 This is compounded because the SGP is supported by evidence which itself has been developed with little public engagement, such as the Midlands Engine and Midlands Connect Reports, and which are based on assumptions, such as the purported benefits of large scale road building, that have not been sufficiently challenged in the development process.

3.5 Despite that the SGP, which has very little actual detail (for example, nothing to say where or what size actual roads will be), may still be used to support the development of local plans and in individual planning cases, even though the details have not been put before the public for consultation and examination.

3.6 This democratic deficit will be further compounded by the proposed Memorandum of Understanding between local authorities on the contentious issue of housing numbers and distribution, especially if it comes before there has been proper public debate on the issue. All this risks leaving local people with no opportunity to have their say until it is too late.

3.7 A lack of supporting information has exacerbated the problem for organisations such as CPRE who wish to comment on the SGP. The HEDNA was published last year but we have significant concerns about its conclusions.

3.8 The Landscape, Flood Risk and Utilities Reports were published alongside the SGP Consultation Document this year. We consider implications on landscape later.

3.9 A Sustainability Appraisal was also published, but only in the middle of the consultation, and many details are still lacking, particularly in relation to the invasive A46 Expressway. Crucially, the document fails to consider options for lower levels of delivery. We suggest that this a serious omission given the uncertainty of the growth projections used to inform the SGP.

3.10 A report on the transport implications of the SGP was finally published in March 2018 but that only considers levels of traffic between strategic areas and only assesses theoretical road needs between 2031 and 2051.

3.11 It does not examine the overall impact on local links and junctions, for example into Leicester, and there is no consideration of additional public transport that would be required to effectively support the strategy. It is in our view highly flawed and does not represent an overall assessment.

3.12 In response to an earlier letter from CPRE, Pat Willoughby said that they will: *'assess more localised impacts but this will still be at a relatively high level, appropriate to a strategic plan,'* and that the strategic context is provided by the Midlands Connect Strategy.

3.13 While this is a clear position it is not one we agree is adequate. The impact of induced traffic on local roads will have long term impacts for congestion, the economy and the environment and needs, in our view, to be fully understood before any strategic plan is progressed.

3.14 Lastly, in terms of process, the on-line questionnaire poses a number of important questions and we welcome the fact that these are being asked in a reasonably open fashion. However, the preamble to some of the questions heavily leads the answers. An obvious example is the sentence: *'One piece of infrastructure is absolutely critical to our draft strategy - the 'expressway' proposal for the A46'*. In CPRE's view this is a matter of contention which should not be assumed.

3.15 One option we suggested to the Leicestershire County Council Scrutiny Commission in February was to hold a Public Examination into the overall plan where all parties could present their arguments. This, we were told, would be expensive and of limited benefit. However, if the proposals in the NPPF Consultation Draft go forwards it may become a requirement anyway. We still consider it should be progressed.

4. Timescales

4.1 A key element of the SGP is the assumption that areas for development need to be identified up to 2050. That is 32 years away. To put that in context it is like asking someone in 1986 to identify the development needs for today and to anticipate the many social and economic changes that have happened in-between as well as the incredible uncertainty about population and household levels.

4.2 The absurdity of such predictions can be seen by comparing, as an example, DfT prediction of traffic growth with actual traffic growth. They have consistently over-predicted as the graph below demonstrates, even when traffic growth is actually falling.

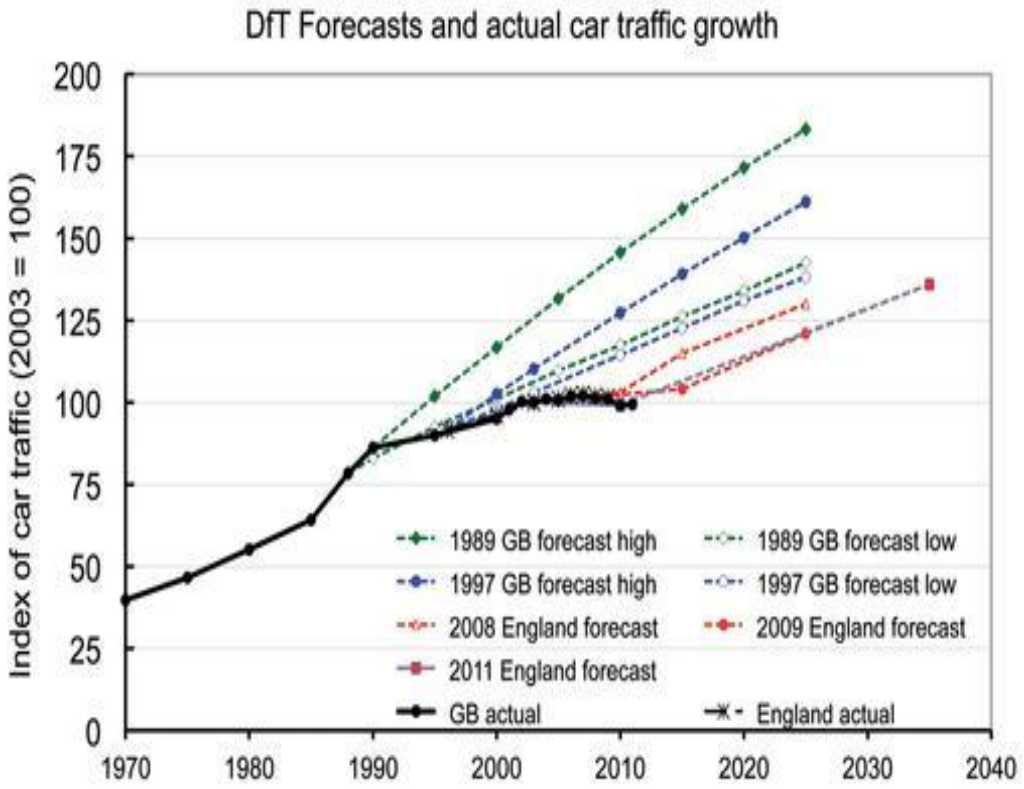


Fig 1. Comparison of DfT forecasts and actual traffic growth

4.3 The impact of such assumptions about future behaviour is important because it embeds current behaviour into the future. The more those trends change the less a model represents real needs. The Office of National Statistics (ONS) has recently downgraded its anticipated population growth, partly reflecting changes in migration trends and trends in births and deaths.

4.4 And even if current trends continue, this approach amplifies the impacts of inherent uncertainties in the calculations. To take one example, the use of the International Passenger Survey (a very small sample) to measure people leaving the country relies on statistical sampling assumptions which risk creating cumulative errors, for example, in relation to the behaviour of international students.

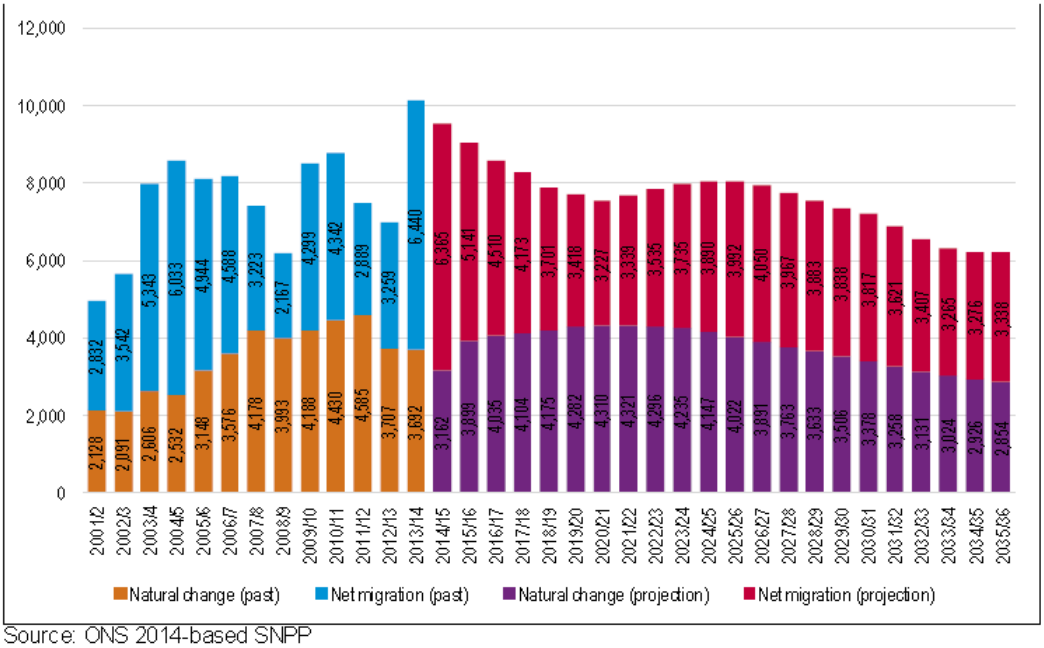
4.5 The SGP acknowledges the difficulty of such forward predictions but says in relation to housing:

"We recognise that projecting forward beyond this date (2031) is highly problematical but we need some notional estimates of growth in order to take a longer term view. In the absence of any more authoritative data, therefore, we have chosen to extrapolate these figures forwards."

4.6 This is not something we agree with. We understand why the HEDNA considers the period up to 2036 (which incidentally leads to lower annual housing requirements) as well as to 2031. It is because local plans need evidence to put to an Inquiry.

4.7 But even a cursory glance at the assumed population changes up to 2036 (see Figure 2 below, reproduced from the HEDNA) shows the difficulty projecting changes beyond that date. Annual population growth in Leicestershire is assumed to decline by roughly a third from 2014 to 2036 and, even allowing for any lag, that is bound to feed into housing need in the period of 2036 to 2051.

Figure 8: **Components of Population Change, mid-2001 to mid-2036 – HMA**



Source: ONS 2014-based SNPP

Fig 2: Population Change: Leicester and Leicestershire (Figure 8 from HEDNA)

4.8 We can accept that the identification of broad policy goals, such as the kind of locations that will be favoured, which may benefit from tentatively adopting a longer time frame but the calculation of housing numbers or the location of specific sites for 15 years beyond the plan period (something neither the NPPF nor the consultation draft require) makes little sense. Not only does that approach risk sites coming forward in locations which turn out to be unsuitable or unneeded but it also threatens to undermine other initiatives, such as brownfield regeneration and the development of small sites, which could better answer development needs.

4.9 In this regard, it is noticeable that the draft NPPF consultation encourages both small sites and brownfield development, suggesting this should be prioritised in future.

4.10 Anyway, long before 2036 there will be opportunities to review the need for housing and employment land and allocate it as needed through a more democratic local plan process.

4.11 Transport projects, of course, can have long lead times. However, again the requirement at Inquiry is normally for twenty years of traffic or patronage predictions. Even projecting that far forward can produce dubious economic results, especially when Cost Benefit Analysis is based on a large number of very small benefits (as in many road projects).

4.12 This problem is only exacerbated by longer term projections which assume a continuation of current patterns of behaviour even though we know that sociological changes, such as an ageing population, will almost inevitably lead to different patterns of travel.

4.13 One particular issue is that by 2050 we will need to have made serious progress towards our climate change reduction commitments. Some of this can be achieved through technological change. However, it is likely we will also need to create more sustainable patterns of growth and unlikely that this will be assisted by dispersed development.

5. SGP Proposals

5.1 CPRE supports the aspiration for a thriving and prosperous county with a balance of development across different areas.

5.2 We agree, in general, to the premise of supporting Leicester as the economic hub of the county while distributing some development to the Northern and Southern Gateways, as well as supporting the Market Towns of Melton Mowbray and Lutterworth and regeneration in other settlements such as Coalville and Hinckley, while limiting development in rural areas.

5.3 However, there are five areas where we have doubts about the SGP's conclusions.

5.4 We are concerned that:

a. the overall housing figures are too high and assumptions about the supply of housing too low;
b. the transport proposals put too much emphasis on major road building;
c. the need for large economic sites, particularly logistic, should be assessed over a wider area;
d. additional work needs to be done to ensure the Environment and Countryside is protected; and
e. there is a lack of rural proofing of the proposals.

a. Housing

5.5 CPRE has a number of concerns about the Government's methodology for assessing housing need and, noticeably, the most recent Government national population projections have been lowered.

Local Authority	OAN in HEDNA 2011-2036	Demographic Trend HEDNA 2011-2036	SNPP in HEDNA 2011-2036	Economic HEDNA 2011-2036	Consultation Approach 2016-2026	Consultation LA Reference 2016-2026
Leicester	1668	1516	1504	993	1626*	1230-1330
Blaby	361	301	278	300	345	370
Charnwood	994	947	950	735	1045	994
Harborough	514	447	402	423	542	532
Hinkley and Bosworth	454	413	377	414	469	454
Melton	170	134	156	170	207	195-245
North West Leicestershire	448	378	304	448	360	270-330
Oadby and Wigston	155	129	110	126	133	148
Total	4716	4265	4081	3608	4727	4193-4403

Fig 3: Leicestershire Housing Figures for 2036 from HEDNA

5.6 The table (Fig.3) shows the total housing required based on Government population predictions, past trends and on economic need as set out in HEDNA. None of these account for the 4,700 dwellings per year in the HEDNA. Indeed, the economic figures suggest that only 3,600 are needed, even though economic prosperity is being used to justify such high numbers.

5.7 The Table also shows the calculation using the new methodology now being proposed by the Government. It is important to stress that the new methodology also increases the housing OAN above actual need but also to recognise that it is based on only 10 years housing growth (up to 2026) and so does not account for a lowering of population growth beyond that, which is likely to lead to a tailing off of actual housing need.

5.8 The new methodology also does not take account of the economic competition between areas of the country which is likely to lead to population loss as well as gain.

5.9 The additional housing, above the Government's demographic predictions, amounts to roughly 700 a year for Leicestershire, something like 14,000 over twenty years. This is now, for lack of any alternative evidence, being extended further into the future (as discussed earlier).

5.10 Our report on the HEDNA went on to consider specifically the response to the higher end figures by Melton, North West Leicestershire and Harborough, who were in the process of developing their local plan.

5.11 All want to exceed their annual OAN in terms of the allocations in their local plans, even using the HEDNA figures which are already above the number of households that are likely to actually exist.

5.12 Some of this over-allocation is tentatively to address shortfalls elsewhere, but in some cases (e.g. Harborough) it involves some double-counting and in others (e.g. Melton) it is driven, at least partly, by a desire to justify the Melton Bypass.

5.13 But this is only one side of the story. A further question relates to the supply of housing land. It is almost impossible to say now how much land will become available in the county up to 2050, particularly on non-allocated sites.

5.14 In our HEDNA report we commented that North West Leicestershire, for example, had not included any small scale windfall sites in its provision, even though these have provided significant land, and are likely to provide more land into the future. It is

certainly hard to believe we will not see new large and small windfall sites coming forward in a major city like Leicester, beyond what is currently known.

5.15 Adoption of proposals in the consultation draft of the NPPF and the related guidance could further increase the supply side figure for local authorities. A number of proposed changes could be significant. The consultation policies would mean both student housing and housing for older people would be included within the requirement (Draft NPPF, paras 62 and 65 and Draft NPPG, page 14) where they offset the need for other housing to be supplied. This could have significant supply-side impacts particularly in Leicester itself. It would also allow Local Authorities to discount previous over-supply.

5.16 The draft NPPF includes further encouragement to improve delivery of higher densities and good design in Chapters 11 and 12. It also removes the perverse requirement that windfall sites should not be counted on gardens (even where that was and will be a significant source of supply) and replaces it with a more nuanced approach based on local character (Para 71).

5.17 If nothing else there will be a need to revisit some supply side calculations if those policies are adopted by Government. This could allow Councils to take a more robust view on their future housing supply and so reduce any theoretical gap between supply and demand.

5.18 This is not just a technical problem (although we understand Councils are under pressure to meet housing numbers whether or not the need really exists). The main concern with over allocation, particularly of market housing, is that it doesn't guarantee greater provision of much needed affordable housing. Indeed the HEDNA acknowledges this in terms of the volume of market housing needed to cross-subsidise affordable housing.

5.19 What over-allocation does allow, however, is for more housing to be built on peripheral, poorly located and car-dependent sites. This is already apparent in the approach to strategic sites as well as specific proposals, such as Whetstone Pastures

where Blaby Council is promising a site of up to 3,500 houses[1], linked to a new motorway junction and the proposed A46 Expressway. We risk achieving the same level of actual provision but in the wrong places.

5.20 We do agree that where new housing is developed it is important that local infrastructure, schools, medical facilities and shops for example, are included in the plans. But peripheral estates and new strategic sites (what we generally call 'sprawl') are never likely to be able to provide the service levels of existing urban areas and, even with the best public transport access, they are unlikely to be as well linked to the urban core as existing areas. Putting the emphasis on very large new housing estates can actually undermine the kind of organic growth which is likely to be more sustainable.

5.21 In our view, there is a need to review the overall housing numbers and to look much more closely at how we deliver the right levels of housing, how we deliver more of it as affordable housing and how we ensure new housing meets local needs, high design and environmental standards, including provision for a growing number of elderly and disabled residents who require more manageable homes or wish to downsize.

Table 5: Notional Housing Need to deliver the Affordable Housing Need (per annum, 2011-36)

	Demographic-led Housing Need pa	Net Need for Affordable Housing pa (AHN)	Potential Delivery (% Total Dwellings)	Notional Housing Provision Required to Deliver AHN
Leicester	1,516	734	20%	3670
Blaby	301	268	25%	1072
Charnwood	947	384	30%	1280
Harborough	447	202	31%	652
Hinckley & Bosworth	413	247	25%	988
Melton	134	70	25%	280
North West Leicestershire	378	194	27%	719
Oadby & Wigston	129	139	22%	632
HMA	4,265	2,238		9,293

Fig 4: Affordable Housing Figures for 2036 from Table 5 of HEDNA

[1] Whetstone Pastures Development Prospectus, Blaby District Council, May 2018.

5.22 Table 5 of the HEDNA (fig 4 above) suggested a need for 2,238 affordable houses per annum by 2036 or 52% of the demographic housing need or 47% of the proposed OAN in the draft SGP. Yet remarkably there is no reference to Affordable Housing in the draft SGP. This, in our view is a serious omission given that the main need is likely to be for rented properties in Leicester and other urban centres, not in any new settlements.

5.23 In terms of distribution between local authorities we agree that the majority of new housing will be needed to serve Leicester itself but there are local needs in all the urban and rural areas.

5.24 The general approach to distribution and balance with the Gateways and the Market Towns is not something we challenge but we are concerned about the overall levels of housing especially where individual authorities are increasing housing number above their actual need or doubling up need (as in the case at Harborough in relation to provision to support Magna Park).

b. Transport

5.25 It is hard to comment in detail on the transport proposals without a detailed assessment of local impacts but we would like to express a number of broad concerns.

5.26 The proposals for large scale road building are predicated on two assumptions, which in our view are both fallacies. Firstly, that there is a need to build a ring of strategic housing sites in the countryside round Leicester, as well as smaller towns such as Melton Mowbray. Secondly, that building these new roads will improve journey times and reduce congestion. In many ways these are contradictory goals, in that the traffic from the strategic housing sites will fill up the roads, but it also is not backed up in our view by broader evidence.

5.27 It is simply not the case that directing Development along the A46 corridor and in the Northern and Southern Gateways would reduce the length of car journeys to access employment, services, leisure and recreation.

5.28 The resulting locational relationship means it is more likely, as is suggested in the Sustainability Appraisal (p. 52), that *'given that growth is focused along major new road infrastructure, the dominant mode of travel is still likely to be by private car. Therefore, significant growth in close proximity to Leicester could generate increased trips and congestion into the urban area'*

5.29 The impact of large scale road building was examined in detail in CPRE's 2017 Report 'The End of the Road'[2] which was based on research they commissioned.[3] The

[2] http://www.cpre.org.uk/resources/transport/roads/item/4543-the-end-of-the-road-challenging-the-road-building-consensus
[3] http://www.cpre.org.uk/resources/transport/roads/item/4542-the-impact-of-road-projects-in-england

research examined post-operational impacts of recent road building based on Highways England's Post-Opening Project Evaluation (POPE) process.

5.30 Unlike Highways England, the consultants working for CPRE compared traffic growth to actual regional growth as opposed to notional traffic forecasts, allowing a better picture to be produced of the real effects of road building.

5.31 The technical report demonstrated that economic impacts of road building were over-rated and often happened in the wrong locations, that the roads generated significantly more new traffic than was admitted (so called 'induced traffic') and that they had significant environmental impacts. Their policy conclusion was simple:

The findings of this study suggest that a major change to national policy is called for, involving a move away from large-scale road building. The evidence of the last 20 years suggests that:

- *Any benefits of road schemes in terms of congestion relief are short-lived*
- *Road schemes cause permanent environmental damage*
- *The evidence that they deliver economic benefits is lacking.*[4]

5.32 One particular problem is that any such additional traffic inevitably ends up on local roads which often cannot cope, (although the extent of the issue in this case has yet to be revealed).

5.33 Notably the SGP refers to the need to address this particular issue in regards to the A46 Expressway, but does not consider whether or not there are solutions that would either be practical or acceptable, even though this would seem to be a prerequisite of taking the scheme forwards. People already living on busy and constrained roads into the urban centre from the bypass area may have concerns about the realism of all this.

5.34 Midlands Connect took a largely traditional approach of examining inter-urban road schemes only in terms of notional time savings on the strategic highway network.

[4] http://www.cpre.org.uk/resources/transport/roads/item/4542-the-impact-of-road-projects-in-england, Page 129, Para 11.7

It ignored the obvious flaws and limitations in that approach. The problem is that such analysis is likely to support policies that lead to a long-term increase in car dependency just when we need to reduce it.

5.35 It is a problem which is likely to be further exacerbated by the creation of a Major Road Network by Government, something which Leicestershire County Council is lending support to and even seeking to expand in the county. This risks further skewing investment towards inter-urban roads, and while at the moment it is envisaged as involving money from the SRN pot, in the end such expensive capital schemes are likely to lead to squeezes on the overall transport budget.

5.36 The alternative approach would be to invest in a step-change in public transport provision with much greater emphasis on managing local travel. The development of a comprehensive approach to public transport in Leicester and other key centres would seem to be imperative if one is to generate the agglomeration benefits that come from well-functioning urban centres.

5.37 Such a step-change is something we believe is overdue. As the SGP Sustainability Appraisal (page 48) notes: *'car use is still highly popular which in turn leads to congestion on the roads in the urban area and it is worse than most comparator cities in England'*.

5.38 What is needed is to create an integrated system of buses and rail, along with light rail, tram routes or guided busways across both Leicester and Leicestershire and serving both urban and rural areas.

5.39 It is not enough to rely on a very limited programme of bus lanes, park and ride, cycling and walking routes as happened in the past. The thinking of 15 to 20 years ago, which appears still to shape the thinking behind the SGP on sustainable transport, is simply not adequate to deal with the scale of the issues we will face in 2031, let alone 2050.

5.40 But although these actions are clearly needed, nothing in the SGP suggests what such a mixture of bus prioritisation and metro schemes linked to demand management

and well located park and ride sites might look like or considers how it might be delivered.

5.41 There is no assessment of ways to serve new communities on the edge of Leicester with public transport provision that delivers carbon and congestion gains.

5.42 There is no comparison with cities which are trying to deliver these kinds of transport solutions, for example, the expanding tram system in Nottingham, Cambridgeshire's Guided Busway, or Oxford's outward expansion of Park and Ride.

5.43 It is important to stress that such an approach would not (and should not) seek to achieve the same goals as major road projects, since it would primarily aim to encourage urban living and urban regeneration, while supporting sustainable transport initiatives in rural areas. But such an approach is the only way to deliver sustainable transport goals and reduce congestion in a long term and sustainable manner.

5.44 Local public transport investment would need to be linked to significant investment in strategic rail, including inter-urban improvements to links with Birmingham, London and the North.

5.45 In this regard CPRE supports improving rail connections from Leicester and Leicestershire by rail with other centres as set out in the Midlands Connect Strategy. These rail plans along with full electrification of the East Midlands mainline represent positive steps forward but are not sufficient to address the more local and pressing sustainable transport needs of Leicester and Leicestershire.

5.46 Unfortunately the most recent Leicestershire Local Transport Plan (LTP3), where one would expect such policies to be elucidated, does not deliver this much needed change of direction.

5.47 While LTP3 acknowledges the problem of traffic congestion in urban areas, saying in Para 3.24 that '*there remain congestion issues in both [central Leicestershire and Loughborough], particularly in Leicester City, and on its arterial routes and ring*

roads', it does not suggest any major public transport initiatives to respond to this issue.

5.48 But it shows the scale of the problem. Census results, for example, show that 60-70% of travel to work was by car in all the urban areas in Leicestershire (even when accounts for the 10% of people who work from home.)

District	Bike	Bus	Car / van	On foot	Work from home
Blaby	2.7%	5.1%	68.8%	5.9%	10.4%
Charnwood	3.7%	4.9%	63.5%	9.9%	10.3%
Harborough	2.0%	2.0%	65.9%	8.1%	15.0%
Hinckley & Bosworth	2.2%	2.9%	68.9%	7.5%	11.2%
Melton	2.2%	2.4%	63.0%	10.9%	13.8%
NW Leicestershire	1.6%	2.2%	70.3%	7.4%	11.2%
Oadby & Wigston	3.0%	8.1%	64.0%	8.1%	8.7%
Leicestershire	2.6%	3.9%	66.5%	8.3%	11.4%

Table 3.1: Mode share on journey to work trips in Leicestershire (Census 2011)[95]

Fig 5: Mode Share in Leicestershire from Table 3.1, LTP 3

5.49 The latest evidence[5] suggests this problem has got worse. Traffic passing cordon locations (monitoring points) round the urban areas had increased, against an overall drop in traffic and particularly on the wider cordon readings round Leicestershire.

5.50 It is a problem which will be exacerbated by an approach to widening strategic roads and increasing housing in areas which will inevitably rely on those routes.

5.51 As LTP3 explains at 5.48:

'Strong journey to work movements between Leicester and the districts surrounding it (over 70,000 people travel into the City each day compared to nearly 28,000 travelling out), combined with high within-city movements already create significant

[5] Transport Trends in Leicestershire, 2016, measured traffic at Cordon Points on roads into various urban areas as well as into the country itself.

https://www.leicestershire.gov.uk/sites/default/files/field/pdf/faq/2017/9/18/Transport-trends-in-Leicestershire-2016.pdf

congestion problems on the main corridors into Leicester. Future housing growth will only exacerbate this problem further unless accompanied by the provision of good public transport alternatives.'

5.52 The contradictions this creates in the thinking around strategic planning are identified in Para 4.3 which says:

'There are genuine reasons for increasing local transport capacity in a fair and equal way, not least to aid the economic recovery, underpin future prosperity and improve social inclusion. But, at the same time we must work to change local travel behaviours and use in order to reduce emissions from the local transport sector.'

5.53 The reality is you cannot do both and a heavily road based strategy will reinforce travel behaviour and exacerbate long distance commuting, undermining congestion benefits.

5.54 If, as para 2.38 of LTP3 acknowledges, 33% of carbon emissions in the county come from traffic, it is surely essential that the direction of travel changes.

5.55 This muddled thinking is reflected in the vague reference in the SGP to increasing capacity on radial routes into Leicester and improving public transport, although how is not explained.

5.56 There is certainly traffic growth on strategic routes from HGVs but we would argue that the county should look at prioritising freight on the strategic highway network rather than facilitating car growth by building large amounts of additional capacity.

5.57 Certainly the uncritical support for a raft of major road building across the county, most notably the A46 Expressway, needs to be reconsidered if a progressive transport policy is to be achieved in the county.

5.58 We had hoped that the promised Transport Assessment of the SGP would examine these issues in detail but it has not done so and we have serious reservations about the usefulness of this work.

5.59 The Assessment, finally published in March 2018, is very broad brush and has limited scope. The first and obvious problem is that it only considers how to accommodate increases in car travel. This seems to reflect the approach of both the SGP and Midlands Connect which is to map future traffic growth on strategic highways and cater for it without consideration of the wider implications of doing so.

5.60 The assessment considers this to represent an appropriate high level response (para 7.2.6), when in fact the most pressing question must be the impact on the functioning of the transport links into and within Leicester and other key settlements which has still not been assessed.

5.61 The assessment also only considers travel between 18 broad areas. This means that all we learn from it is the predicted level of traffic on those strategic highways which link those 18 areas. It also only runs its model for a single a.m. peak hour on the basis that this is the most congested time (when school and work trips cross). Ironically it will be off peak when traffic generation is likely to be most evident, from peak spreading, from new trips forming in the less congested hours and from longer term locational changes.

5.62 To estimate the amount of travel that will occur in the future the model adopts current trip generation levels and assumes those will remain constant as far as 2051. In other words there is no assumed change in travel behaviour, no change in travel patterns resulting from congestion and no peak spreading of traffic. This means that the assumptions are simply unrealistic.

5.63 To compound this problem the assessment does not examine the impact of not delivering A46 and A5 Expressways. Instead it assumes both schemes are delivered by 2036 and takes that year as its base case. This does not allow consideration of the implications of the SGP development proposals without those proposals in place, nor does it allow the impact of those schemes on local roads to be considered.

5.64 It does not consider whether those schemes or the new housing (or both in concert) are likely to lead to induced traffic (as is evident from Highways England's

POPE studies) or what the implication of that would be on the functioning of other roads in Leicestershire.

5.65 It does not create the usual base case in which only committed future schemes are included.

5.66 And even if such analysis stood up to scrutiny in terms of future traffic levels, it would still not answer many of the most important questions including:

1. What are the impacts on traffic within sectors?

For example, there are 2433 new trips generated by the modal in 2051 wholly within the South East Leicester quadrant. That excludes trips passing through that quadrant. Would the local roads be able to cope with that and what would happen if they couldn't?

2. What are the impacts on specific nodes/links?

For example, 4941 new trips generated by the modal in 2051 are going into Central Leicester, the largest number from the South East Leicester Quadrant. Can the links and nodes on routes into Leicester carry that level of traffic and if they can't what will happen?

3. What are the impacts of introducing charging or prioritisation?

For example, if mechanisms for charging vehicles, such as congestion charging or work place parking charges were introduced before 2051 how would that impact on travel patterns? If priority lanes for HGVs were introduced on the strategic highway network what would be the impact of that?

4. What would be the impact of alternative strategies e.g. park and ride?

For example, if Park and Ride sites were developed how would those sites interact with the network, both in terms of congestion reduction on local roads and in terms of traffic generation on roads accessing those sites.

5. What is the likely impact on climate emission and pollution?

In particular how much are climate change emissions and pollution likely to rise (either directly or indirectly) from the increase in traffic, even taking account of an increase in the use of electric cars.

5.67 In fact, what the assessment demonstrates is that the SGP is predicated on a simplistic 'predict and provide' approach to strategic highway provision. Consideration of the impact of that approach on sustainable transport provision or on the functioning of the local highway network is passed forwards to be dealt with at some other (largely unspecified) stage. There is no analysis of the impact on climate change emissions. CPRE views this as completely inadequate.

5.68 The conclusion in para 7.2.2 of the report that the network can cope up until 2036 cannot be unsubstantiated without proper link analysis, and the assumption about further interventions being required up to 2051 in para 7.2.3 is largely speculative. The dismissal of sustainable transport modes (i.e. the justification for additional highway capacity beyond 2036) in para 7.2.4 is based on a 'business as usual' model which does not capture the central interplay between behaviour and transport provision.

5.69 Para 7.2.7 acknowledges the need for sustainable transport provision but is vague about what is needed and does not include any suggestions for actual schemes (even for general policies) that should be proceeded with. On the other hand it advocates further additional strategic highway provision on the A46, A5 and M1.

5.70 Experience of funding for transport in the County (and more widely) would suggest that such equivocation is unlikely to deliver the step change in sustainable transport provision required to ensure Leicestershire becomes less dependent on car travel. Instead it will simply reinforce the continuing failed policy of predict and provide.

c. Economic Development

5.71 Identifying the need for industrial sites to support development is complex, not least because of the importance of ensuring that sites are genuinely attractive to the market and available for construction ('shovel ready' in the jargon). It will certainly be important to ensure that urban sites where there is contamination or other issues are addressed if the County is to thrive.

5.72 We accept there may also be some need for new strategic sites in the County but we are concerned that this is currently being considered only in a narrow local context. This is particularly important when it comes to large regionally and nationally significant industrial sites, particularly for logistics.

5.73 The HEDNA identifies a demand led figure for B8 sites, amounting to 472 hectares (equivalent to 4-8 sites of 50-100 hectares).

5.74 It is a figure which comes from a demand-led study by MDS[6] and relates to what they termed a 'high' level of provision. It is also a total including commitments. The MDS shortfall is actually 268 hectares after taking account of 139 hectares of the current provision within the East Midlands Gateway, which was progressed through the National Infrastructure Commission (NIC) process, and the Magna Park extension which has permission (88 hectares).

5.75 The SGP erroneously refers to the 472 hectare figure not the 268 hectares, a problem which will only be exacerbated if these figures are treated as minimum requirements as was implied in the HEDNA but is unclear in the Draft SGP. For

[6] Wider Market Developments: Implications for Leicester and Leicestershire, Final Report, A Technical Report Commissioned by Harborough District Council on Behalf of Authorities in Leicestershire, January 2017, Tables 3.4 and 3.5

example, if sites such as Whetstone Pastures (which is 441 hectares in total and includes a significant aspiration for warehousing) are given planning permission, the need for other logistics sites needs to be reviewed, but the concern is that this will not happen and each authority will give permission to logistics proposals until there is much more than even the 472 hectare figure.

Table 3.4: Forecast Demand and Supply to 2036 for Leicestershire – Rail-served Sites

Year	ha 2021	2026	2031	2036
Rail Served Leicestershire				
Supply - Land planned for rail-served sites	159	159	159	159
Forecast demand - high	111	150	209	274
Shortfall - high	48	9	-50	-115

Source: Leicester and Leicestershire SDS 2014 (MDST and Savills)

Table 3.5: Forecast Demand and Supply to 2036 for Leicestershire – Non Rail-served Sites

Year	ha 2021	2026	2031	2036
Non Rail Served Leicestershire				
Total Supply - Available at current sites	104	104	104	104
Forecast Demand - high	80	109	152	198
Shortfall – high	24	-5	-48	-95

Source: Leicester and Leicestershire SDS 2014 (MDST and Savills)

Fig 6: Demand Led Logistics Assessment from Tables 3.4 and 3.5 of the MDS Study

5.76 The NIC website[7] also includes a number of other competing proposals in the county, most notably the Hinckley National Rail Freight Terminal (which is at pre-submission discussion stage), which would amount to 315 hectares, more than all the required new land by 2036.

5.77 There are further nearby NIC proposals for Rail Freight Terminals at Northampton, East Midlands Intermodal in Derbyshire, a proposal at Daventry near

[7] https://infrastructure.planninginspectorate.gov.uk/projects/

Rugby and a 270 hectare site at Four Ashes in Staffordshire, far larger than any local need can justify. In this crowded market over-provision in Leicestershire is simply not needed. The reliance on a minimum which is already inflated is worrying.

5.78 The problem then is that these sites service a national market and there are already competing proposals in other areas of both the West and East Midlands and no consistent strategic assessment process in place.

5.79 To a limited degree it could be argued that such over-allocation creates competition between sites, but it is also likely to lead to capacity which is never used, including costly investment in supporting infrastructure. These sites can also have large impacts on the environment, with their very high buildings, night time lighting and noise.

5.80 In the past, regional planning processes sought to address this particular conundrum. That important role is now devolved to local authorities. But until there is a broader analysis of competing sites, we believe the figure in the HEDNA is exaggerated and a more modest level of B8 provision should be progressed and further sites only identified when that amount is actually occupied.

d. Environment, Landscape and Countryside Issues

5.81 CPRE is particularly concerned about the relationship of the SGP proposals to environmental, landscape, heritage and countryside protection.

5.82 In CPRE's view the SGP is an unbalanced plan which fails adequately to address the impact of its proposals on environmental, landscape, biodiversity, and heritage assets, or the implications for rural communities, pollution and climate change. Instead of offering a vision for the future for Leicestershire environment, countryside and rural communities, it appears to treat greenfield land as an inexhaustible and easy source of sites for new development.

i) An Unbalanced Plan

5.83 Despite repeated references to: *'distinctive environmental, historic and other assets'* and the need to protect *'places and features that make Leicester and Leicestershire special'*, in reality, the SGP has little to say about the impact of its proposals on the environment, landscape, heritage and biodiversity.

5.84 Protecting assets that *'are most important to us'* is proclaimed as one of the building blocks of the plan and identified as the fifth pillar of the strategy, yet the document fails to offer a vision of how environmental protection will underpin the Plan so it is enshrined in the development process.

5.85 Tellingly, the *'key features that are important to Leicester and Leicestershire'* are listed in one single sentence: '*We have few national or international constraints but there are key features that are important to Leicester and Leicestershire, not least the National Forest, Charnwood Forest, Bosworth Battlefield, areas separating urban areas (our 'green wedges'), valuable landscape and townscape, local nature*

conservation designations, civic heritage, conservation areas, etc...' The list is led by significant assets, all on the western side of the county. Other features are referred to in general terms without mentioning specific locations.

5.86 What is noticeable is the use of the words *'constraints'* as opposed to *'assets'*. In CPRE's view the features identified are assets which have value in themselves, as well as providing ecological, landscape and amenity value to communities. They should not simply be seen as things which get in the way of development.

5.87 It is equally worrying that the Plan gives the appearance that other areas are seen as lacking constraints and, therefore, available for development.

5.88 This reference to constraints also suggests a restrictive and narrow view of the value and importance of the County's landscape character, countryside and rural communities as well as of its biodiversity and heritage assets, especially to the east and south east of Leicester. Despite considerable discussion in documents in the evidence base no attempt is made to include environmental and green infrastructure strategic aims as part of the Plan.

5.89 Rather than relying on vague aspirations to protect the things we cherish, CPRE believe there is an urgent need for this additional pillar to be spelt out. Since the SGP was published two important documents have been produced by Government, *'A Green Future: Our 25 year Plan to Improve the Environment'*, in which the Government sets out a 25 year plan to improve the environment, and the consultation draft for a revised NPPF.

5.90 Both should shape the environmental context of the next draft of the SGP. They should underpin a serious reappraisal of the weight currently given to this fifth pillar in the SGP, creating a more balanced relationship between development and the environment, a better understanding of the benefits offered by the environment, nature and cultural heritage and a recognition that the environment is a natural asset and contributes to the overall economy.

5.91 The next iteration of the SGP should adopt strategic principles and proposals which contribute to conserving and enhancing the environment, protect and enhance valued landscapes, recognise the intrinsic character and beauty of the countryside and provide net gains for biodiversity by establishing coherent ecological networks. It should aim to improve people's health and wellbeing by giving them access to green spaces, nature and heritage assets in the countryside.

5.92 If such a reappraisal is undertaken, and if it impacts on how much development there is and where it occurs, the result could be a more balanced plan that would result overall in an 'environmental net gain' over the period to 2050.

ii) Landscape Impact

5.93 Protection of the landscape of Leicestershire is a particular concern to CPRE. The SGP includes a number of potential threats to areas of sensitive landscape. Its proposals would undoubtedly impact of the landscape character of different parts of the County, especially on the edge of Leicester.

5.94 The plan acknowledges the importance of areas such as Charnwood Forest, which is welcome, and there is some commitment to protecting and enhancing those assets, but there are many other areas of attractive villages, countryside and landscapes all across Leicestershire.

5.95 Most major new developments, both on the A46 Expressway and in strategic settlements, would take place on greenfield land. It is disappointing, therefore, that the Plan itself contains no recognition or evaluation of the nature and scale of this impact on sensitive rural landscapes and countryside. In CPRE's view, such an evaluation needs to be undertaken as part of the SGP process and not left to a later date as part of Local Plan Processes. Without that, the plan cannot be fit for purpose as a framework to guide future planning in Leicestershire.

5.96 This is especially so given the comments (para. 1.3) of LUC Consultants in the landscape report accompanying the SGP[8]. They argue that securing economic growth

[8] Landscape Sensitivity and Green Infrastructure Study for Leicester and Leicestershire, Oct 2017

and housing demands *'will have to be achieved in a way that conserves and enhances landscape, biodiversity and green infrastructure'*. They go on to suggest that: '*the National Planning Policy Framework (2012) is clear in this respect, referring to the importance of conserving and enhancing valued landscapes, minimising impacts on biodiversity and achieving net gains in biodiversity wherever possible'*.

5.97 This requirement remains in the 2018 draft NPPF at paragraph 168. But, among other things, it also calls for recognition of *'intrinsic character and beauty of the countryside, and wider benefits from natural capital – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'*

5.98 Given that local and neighbourhood plans are required to conform to the NPPF, we would expect a new draft of the SGP to seek to avoid development that undermines the *'intrinsic character and beauty of the countryside'*.

5.99 The SGP is a broad brush strategy which lack specific detail. It is the LUC report where one would expect to discover more detailed clues as to the Plan's potential impact on the countryside and landscape.

5.100 Unfortunately, although we accept their general approach (in as far as it goes), we have three particular concerns about the scope and methodology employed. In our view, these limit the robustness of the conclusions that can be drawn about the sensitivity of some areas to development.

5.101 Firstly, the assessment does not consider the impact of major road building proposals. In the case of the A46 Expressway proposal which is described in the Plan (p. 14) as *'absolutely critical to our draft strategy'*, the lack of such an assessment is, in our view, a serious omission.

5.102 Secondly, the criteria, namely *'housing developments (2-3 storey properties)'* fails to take account of the different impact of varying scales of development on the landscape. A particular landscape might satisfactorily accommodate a relatively small development of 30 or 100 houses but would be severely and adversely affected if the

development, together with associated infrastructure, was for 1500, 4000, 6000 or even more homes.

5.103 Thirdly, the study does not address the cumulative effect on the landscape of several sizeable developments close to one another and, the resulting impact of an accumulation of development on the unity and integrity of wide and intact landscapes.

5.104 Without consideration of these points in relation to specific locations, the SGP is effectively asking for a blank-cheque approval from the LUC report for its proposals. With only broad figures and locations (especially with the particular emphasis on strategic development locations after 2031), there is an absence of detail on how development would be distributed and located within each growth area or the broader principles that would guide the process of choosing development sites and ensuring that they were sensitively located.

5.105 What is needed is more clarity on the size and the distribution of new development. Will individual locations be for 1500, 4000, 6000 or 10,000+ homes? What will be the added impact of: *'the infrastructure that is essential to their delivery'?* Will the approach be different in each of the growth areas? Without such clarification, it is difficult to comment fully on the possible landscape and countryside implications of the SGP and our comments must be general in nature.

5.106 The area of Leicestershire most severely impacted by the Plan's development proposals is the Primary A46 Growth Corridor. In the LUC Landscape Sensitivity Assessment Report this area falls within Eastern Growth Corridor (SOAZ 5).

5.107 When considering the rural, agricultural, and historic landscape character of this area, particularly away from the Leicester urban fringe, the report concludes that the northern part has a higher sensitivity to development than the southern part. We would not dissent from that judgment.

5.108 CPRE consider the landscape in High Leicestershire, which forms a large part of the northern element of the SOAZ, to be especially valuable and worthy of specific

mention in the list of key features of page 11 of the consultation document alongside areas such as Charnwood Forest.

5.109 However, while the LUC assessment emphasises its rural character and rates its sensitivity to development as *'moderate-high'*, CPRE considers that, taking account of our concerns about the scope and methodology of the assessment, the sensitivity rating for High Leicestershire should in fact be *'high'* based on the conclusion that can be drawn from LUC's comments.

5.110 On page 119, for example, they suggest that away from the Leicester urban fringes, the rural parts of the area: *'would be highly sensitive to both development scenarios, with only limited housing developments within existing settlement curtilages likely to be appropriate'*.

5.111 They go on to say that*: 'Sensitivity is presented by the highly rural and tranquil qualities of much of the landscape, with its distinctive elevated topography providing a backdrop to settlement and historic villages with distinctive local vernacular nestled into the landform and its wooded context. Valued tracts of semi-natural habitat, including wetlands and surviving swathes of ancient woodland; along with historic land uses including parkland estates, create further sensitivities.'*

5.112 This presents a picture of a landscape that is intact as a unit, with highly rural and tranquil qualities, a sense of timelessness associated with traditional villages and historic features and semi-natural habitats which all contribute to its particular intrinsic character.

5.113 In addition, the countryside of High Leicestershire provides a valuable resource on the borders of Leicester for the physical and mental wellbeing of walkers, cyclists and others from the urban area and more widely, as well as for an agricultural and farming economy.

5.114 In CPRE's view, the special contribution of High Leicestershire to the character of the county has not been fully recognised or acknowledged in the SGP. Any new settlements along that part of the A46 Growth Corridor or expansion of the Leicester

conurbation into that part of rural Leicestershire would have significant negative effects on the quality and integrated character of the High Leicestershire landscape and on its countryside and rural communities.

5.115 The LUC report suggests that the southern part of the Eastern Growth Corridor (SOAZ5 south) is less sensitive to development than High Leicestershire. We agree but in the light of our concerns about the methodology of the LUC assessment, we argue that its overall sensitivity rating should be *'moderate'* for both housing and small scale commercial development.

5.116 Sensitivity to development, and especially to the introduction of strategic development locations, varies across this southern part of the corridor. Its northern edge, adjacent to High Leicestershire, is attractive rural countryside consisting of farm and park land, including important heritage and biodiversity assets, such as the Kilby-Foxton Canal SSSI, the Grand Union Canal Conservation area, and the nationally important medieval settlement remains at Wistow. This area would be very sensitive to the introduction of large scale development.

5.117 Other areas further south are more affected by presence of existing development and transport infrastructure. While they are likely to be less sensitive they would still be negatively impacted by very large-scale developments and, from a landscape perspective, any coalescence of settlements would increase the visual impact on the countryside.

5.118 One particular outcome of the proposed A46 Growth Corridor proposals would be an eastward expansion of the Leicester conurbation into rural Leicestershire and a new ring of development stretching from south of Leicester to the north of Loughborough, joining up with existing development along the Soar Valley north of Leicester as well as Birstall and west of Syston.

5.119 To mitigate these impacts the LUC Report adopts the assumption from the Sustainability Appraisal (p. 97) that adverse effects on the landscape can be mitigated through green infrastructure measures and the use of Garden City principles.

5.120 CPRE agrees that, whatever development occurs, appropriate Green Infrastructure measures will be needed to provide local green spaces, species habitats, protection for specific heritage assets and areas for recreational walking and cycling routes. However, given the scale of development proposed along the A46 Growth Corridor, we cannot see a way of preventing an adverse impact on the overall character of the landscape and countryside along the proposed corridor.

5.121 In particular, Green infrastructure is not a way of mitigating the cumulative impact of large scale developments on an intact landscape.

5.122 Equally, it is suggested that pursuing the Garden City concept could mitigate the significant adverse effects of new settlements along the corridor. However, it is far from clear how this could be achieved and even less clear how pursuing such a concept would avoid significant impact on this sensitive landscape and countryside.

5.123 In our view, the cumulative damage to the corridor could not be mitigated through the use of Green Infrastructure measures or by adopting Garden City principles. This needs to be directly addressed in the next iteration of the Plan.

5.124 These problems are only exacerbated by the lack of strategic principles to guide the process of choosing locations for new settlements, a serious omission from the SGP, given that it will set the framework for Local Plans.

5.125 The reality is that if there is to be any development in the A46 Growth Corridor, the location of strategic settlements needs to be planned strategically. If this process is left solely to individual Local Plans, the end result, despite the duty to co-operate, could be an uncoordinated and haphazard pattern of settlements. Once again, more strategic detail of what is proposed through the SGP is needed for the proposals to be fully evaluated and scrutinised.

5.126 In terms of the other growth areas, namely the Northern and Southern Gateways and the key centres of Melton Mowbray and Lutterworth, the SGP provides little indication of the strategic principles which would guide the location of development.

5.127 Each area has its own landscape features, historic villages, semi-natural habitats, and tranquil areas, biodiversity and heritage assets which should be valued and protected. Each is impacted by the nearby urban and industrial areas, major road and rail transport routes as well as. There are areas under pressure to deliver future development and, in some cases, new logistics and distribution infrastructure.

5.128 Without more detail it is difficult to comment further, other than to identify a few examples of important landscape character assets in each growth area.

5.129 In the Northern Gateway we would point to the historic character of villages, such as Diseworth and Long Whatton. In relation to Melton Mowbray we would emphasise the nationally designated River Eye SSSI.

5.130 The landscape of the Southern Gateway, while already *'strongly influenced by human activity and development'*, includes key landscape features, such as the ecological corridor and Conservation Area along the Ashby Canal. Around Lutterworth there are important features such as the historic village of Bitteswell. The plan needs to set out how each of these will be protected and enhanced.

iii) Biodiversity and Natural Environment

5.131 The contribution of biodiversity is largely ignored in the SGP document. Although there are some references to biodiversity features and assets in the Sustainability Appraisal and Landscape Assessment, this has not resulted in a set of strategic objectives to protect the environment.

5.132 There is no sense of how nature and biodiversity contribute to the overall character and quality of Leicestershire's countryside, natural environment and landscape. Nor is there any appreciation of the mental and physical wellbeing benefits that can be gained through access to nature, green spaces and nearby countryside.

5.133 The Sustainability Appraisal and Landscape Assessment refers to a number of specific features, such as SSSIs, local nature reserves, river and canal features, which it considers to be significant, but does not produce a comprehensive list.

5.134 It also only considers those assets and their locations as individual features in the landscape rather than as parts of ecological networks and habitat corridors.

5.135 This lack of a systematic and comprehensive assessment of the SGP's impact on Leicester and Leicestershire's natural environment and its biodiversity is worrying, especially given that the Sustainability Appraisal (p. 27) acknowledges that: *'Leicestershire has a lower than average biodiversity value than the rest of the UK'*.

5.136 Data from the Leicestershire and Rutland Wildlife Trust suggests that the 92 legally protected Sites of Special Scientific Interest cover about 2% of the two counties compared to a national average of about 6%[9].

5.137 More widely there has been a loss of species and habitats across Leicestershire, with changes in agriculture and development pressure resulting in many of the most important wildlife sites becoming small and isolated from one another. This makes them particularly vulnerable to future decline.

5.138 In the face of this situation and the scale of development proposed in parts of the county, the suggestion in the Sustainability Appraisal (p. 27) that the approach to future development should be to *try to minimise* its impact on existing assets and to *look to* enhance ecological networks appears weak and limited in character.

5.139 While the Sustainability Appraisal recognises some of the problems it presents an optimistic picture, suggesting the detriment to biodiversity will be minimal at worst, particularly if Green Infrastructure measures are implemented. A similar view comes through in the Landscape Assessment document.

5.140 This approach focuses on avoiding the impact that development would have on particular locations of individual features but does not consider the impact on wider ecological networks and habitat corridors as a whole.

[9] http://www.lrwt.org.uk/wildlife/wildlife-leicestershire-rutland/

5.141 In addition, it fails to take full account of the cumulative impact of closely located developments, (although there are hints in the Sustainability Appraisal that this is a concern that needs addressing.)

5.142 The Sustainability Appraisal (page 22) points to the east and, to a lesser extent, the south east of the city as having been identified as: *'potential opportunity areas for development beyond 2031'* that *'are not characterised by sensitive/designated biodiversity assets'*. It is unclear what is meant by sensitive in this regard. Does this mean assets that do not have the benefit of designated protected status? If so, greater clarity is needed as to which and what types of sites have been considered in reaching this conclusion about the impact of development on the county's biodiversity and habitats.

5.143 In discussing possible development on the urban periphery and in the A46 corridor (pages 23 and 26), there is some acknowledgement that there could be *'cumulative effects should growth at the urban periphery be within close proximity to 'new settlements' along this corridor'*. It goes on to suggest (page 97) that development along the corridor *'should avoid effects on SSSI's'* without considering local wildlife sites and protected species that may be affected or the risk of green infrastructure links into and out of the City being severed, particularly along the River Sence.

5.144 Optimistically, in our view, it suggests that *'strategic opportunities <u>ought</u> to provide the potential for green infrastructure enhancement and to retain important habitats'* along the A46 growth corridor and that the Garden City Concept and green infrastructure *ought* to provide: *'the framework for Local Plans to deliver growth that helps to strengthen links between habitats rather than lead to fragmentation'*. This optimism is however caveated, when it says there are *'uncertainties at this stage given the high-level nature of the strategy'*.

5.145 The use of word *'ought'* suggests aspiration and hope rather than specific strategies and proposals. Given that there has been no consideration of the links between habitats or of ecological networks, it is difficult to see how the SGP or even

the green infrastructure suggestions in the Sustainability Appraisal and the Landscape Assessment can provide a framework for Local Plans to end the fragmentation and isolation of wildlife sites.

5.146 We consider the evidential base provided for the conclusion that there will be minimal impact on biodiversity along the A46 corridor or in the Northern and Southern Gateways to be limited. The cumulative impact of multiple developments on particular features and, more importantly, on ecological networks and habitat corridors is neglected and needs to be addressed.

5.147 We disagree with the view that the preservation of individual sites, selected for their particular interest or significance, is a sufficient basis to protect nature and biodiversity. A more detailed and complete assessment of biodiversity assets needs to be incorporated into the SGP which take on board the Government's recently published Environment Plan and the consultation draft of the NPPF.

5.148 Only if all this is undertaken, could the SGP be considered a balanced framework to guide future planning in Leicester and Leicestershire.

iv) Nature, Health and Wellbeing

5.149 The SGP also fails to recognise the important contribution of nature, green spaces and the countryside to mental and physical health and wellbeing. It needs to acknowledge the multiple health benefits a good environment can provide.

5.150 Contact with nature, participation in nature-based activities and viewing natural scenes and landscapes all have strong positive health effects. Access to green spaces and the countryside are not only important for individuals, they play a key role in promoting human health, providing public health benefits in relation to physical inactivity, increased obesity, mental ill health, dementia and social isolation.

5.151 This is something the Government wants to promote and the Government's Green Future Plan is clear: '*Spending time in the natural environment – as a resident or a visitor – improves our mental health and feelings of wellbeing. It can reduce*

stress, fatigue, anxiety and depression. It can help boost immune systems, encourage physical activity and may reduce the risk of chronic diseases such as asthma. It can combat loneliness and bind communities together.' [10]

5.152 In line with the Government's plan the SGP needs to recognise the importance of the natural environment and the countryside to wider public health concerns. As part of the fifth pillar of the SGP, there need to be practical strategies and proposals that value, protect and enhance the environment's role in wellbeing.

v) Cultural Heritage

5.153 The numerous historical and heritage assets across Leicester and Leicestershire are important and valued features in the built environment and the rural landscape. Collectively features such as Scheduled Ancient Monuments, Listed Buildings, Registered Historic Parks and Gardens, Canals, deserted Medieval Settlements, surviving ridge and furrow all contribute to the intrinsic character of Leicestershire's Heritage.

5.154 Many are noted in the Landscape Assessment document and to a lesser extent in the Sustainability Appraisal, as well as being located on the Environmental, Historic and Other Assets Map. Unfortunately these do not provide a full picture of the extent of these assets. For example, the map does not mark Historic England's top 10 priority townships for contiguous areas of ridge and furrow, three of which are in East Leicestershire and one of which is partially within the proposed Eastern Growth corridor, nor does it mark Local Green Spaces or Important Open Land.

5.155 A study of one particular parish, Hungarton[11], which has more than 70 historic environment listings, suggests that there are more historic features within parishes, villages and towns than is suggested in either of these reports or located on the published map. Many of these features could be adversely impacted by poorly sited and inappropriately designed development. We consider it essential that there is a

[10]' A Green Future: Our 25 Year Plan to Improve the Environment' Jan 2018, page 71
[11] Hungarton Neighbourhood Plan Area, Historic Environment Records: http://www.hungartonparishcouncil.org.uk/uploads/appendix-4-hungarton-historic-environment-listing-copy-2-(1).pdf

comprehensive database that records all these assets and not just a few better known ones.

5.156 CPRE is concerned about how the proposals in the SGP will impact on Leicestershire's heritage assets and is not convinced by the underlying view in the Sustainability Appraisal that these assets can be protected by careful siting of new settlements and development. We are also sceptical about the extent to which cumulative impacts can be mitigated through green infrastructure measures and implementation of the Garden City concept.

5.157 This is particularly the case in relation to the A46 corridor through to the Southern Gateway. In the Sustainability Appraisal, despite some uncertainties about the location of specific sites for new settlements, it is acknowledged that: *'there is certainly potential for growth to affect the setting of heritage assets, especially where these are reliant upon an open, rural setting'* (page 106). This is particularly likely if the gap between new settlements and between them and existing settlements and or urban fringe is narrow or virtually non-existent. Similar considerations also apply to developments in the Northern and Southern Gateways.

5.158 Without clearer guidelines about the choice of sites or more specific locations for new settlements, it is difficult to assess the impact of such a 'blank-cheque' approach. As a result we are unconvinced by the conclusion in the Sustainability Appraisal (p. 106) that: *'there ought to be enough flexibility in site choices and in the layout of developments to avoid sensitive areas, and to mitigate potential effects on heritage assets and to ensure that the cumulative effects of growth are not major.'* The SGP, as the framework to guide Local Plans, needs to set out principles for site selection which ensures the protection and enhancement of heritage assets.

vi) Pollution and Climate Change Issues

5.159 The SGP is extremely weak on tackling pollution and climate change. Nowhere does the Plan directly address the consequences of its proposals on these two critical aspects of Government policy.

5.160 A major concern revolves around the road building proposals and the lack of specific sustainable transport plans which we have already discussed in the transport section.

5.161 However, there are other elements relating to a zero carbon economy and carbon neutral development which are also of concern.

5.162 The SGP sets as one of its priorities (page 12) the delivery of high quality development and elsewhere (page 17) suggests that the Garden City concept will ensure development is based on strong environmental foundations. However, there is no commitment to achieving low or zero carbon developments.

5.163 The Sustainability Appraisal (page 104) is damning in this regard: '*the Plan is mostly silent on the issue of climate change, with no strategic approach being proposed to help move towards a zero-carbon economy*'.

5.164 There is certainly a need to ensure new buildings are carbon neutral and to capitalise on the potential for decentralised and community energy schemes.

5.165 The vision for new housing developments needs to actively promote renewable energy technologies: solar panels; ground-source heat pumps; electric vehicle charging facilities.

5.166 And, at the same time, there is also a need for the vision to include a strategic overview for the provision of wider scale renewable energy sites which can then be adopted in Local Plans.

5.167 Rather than leaving it to the market the location of wind and solar farms should be based on utilising the best sites, taking account of landscape and agricultural land quality.

5.168 The logistical impacts of anaerobic digesters and where they would be best sited need to also be considered.

5.169 The vision also needs to be future-proofed to take account of new developments in this sector.

vii) Garden Cities Concept

5.170 The SGP presents a vision of high quality new settlements based on a Garden Cities concept. It claims that will result in development that captures the best of town and country and be planned with strong social, economic and environmental foundations with communities placed at the heart of planning.

5.171 All this sounds very grand and visionary and is worthy of aspiration. But in reality what is presented is a vague statement which lacks any definition of what constitutes a garden city, town or village.

5.172 There is little indication in the SGP or in the Sustainability Appraisal or Landscape Assessment of how such a development would look like, the main principles and features involved in such a settlement, or how these Garden towns or villages would fit into the A46 Corridor or into the Northern and Southern Gateways.

5.173 It suggests the concept of Garden Cities will form the basis for a common agenda guiding Leicester and Leicestershire Local Authorities in bringing forward new strategic development, but it is not made clear what constitute Garden City principles or how they would form part of a common agenda for Leicestershire.

5.174 How will such new settlements be shaped, how will they look when completed and how will they be made into integrated and sustainable communities? None of these questions are answered.

5.175 Without such clarity, there is a clear risk that a vision of high quality development at the heart of planning will get lost in Local Plans processes as pressure for numbers of houses crowds out the more visionary perspectives.

5.176 This could result in too many bland ‘anywhere-you-like’ developments of 3, 4, 5, bedroom executive housing estates on the edge of towns and villages built by volume housebuilders with far too little affordable housing.

5.177 There is also a risk, as currently presented, that a ring of such settlements around Leicester would mitigate both against urban regeneration in Leicester and a balanced approach to development across the county.

5.178 While the idea of developing Garden Cities, Towns or Villages has been fashionable with Government and other organisations, which have advocated new settlements since 2010 as a way to provide more housing, a clearer definition and set of principles is not always forthcoming.

5.179 According the Town and Country Planning Association (TCPA): *'a Garden City is a holistically planned new settlement which enhances the natural environment and offers high-quality affordable housing and locally accessible work in* ***beautiful, healthy and sociable communities.'***

5.180 They set out a number of core Garden City principles, some of which are more relevant from a CPRE perspective than others. [12]

5.181 At the heart of their concept is the idea of developing new integrated and sustainable communities.

5.182 From a CPRE perspective four things are important to achieve to genuinely achieve these goals:

> Firstly, that such communities include mixed-tenure and well-designed homes and housing types that are genuinely affordable. In addition, a place needs to be self-sustained with a wide range of local jobs and strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods.
>
> Secondly, that such settlements are part of an integrated, sustainable and accessible low carbon local public transport system both within the settlements and connected to other centres (such as Leicester). Settlements reliant on major road buildings (such as the A46 Expressway) would be unlikely to fulfill this role.

[12] https://www.tcpa.org.uk/garden-city-principles

Thirdly, that the siting of any new settlement fits into the surrounding landscape without damaging its intrinsic character and integrity (something particularly difficult in to achieve in High Leicestershire.) Such new settlements also would need a surrounding belt of countryside to prevent development sprawl and corresponding cumulative adverse effects on the landscape.

Fourthly, that any new development should be based on the principle that it must enhance the natural environment, the provision of comprehensive green infrastructure networks and net biodiversity gains. It should use zero-carbon and energy-positive technology to ensure climate resilience.

5.183 Unfortunately the record of implementing well planned and sustainable developments across England (and in parts of Leicestershire) is poor. There are too many anonymous, soul-less, land-hungry housing estates.

5.184 Without clear principles, along the lines suggested above, we are likely to see excessive and poorly located greenfield development. We will end up with environmentally destructive, car dependent, low density green field sprawl with large dormitory suburbs and with a lack adequate sustainable transport infrastructure.

e. Rural Issues and Rural Proofing

5.185 In CPRE's view, the SGP needs to have a stronger focus on the rural areas of Leicestershire and seek to have a positive impact on them.

5.186 While there is a brief reference (page 8) to the beauty and variety of the rural landscape and to the importance of the rural economy, including nationally significant agriculture and food production and a growing professional services sector, the SGP is generally urban focused.

5.187 Much of the housing, employment, road and other infrastructure developments are located in rural areas, but not specifically to meet the needs of rural communities.

5.188 Given that there are likely to be major problems in improving and maintaining the sustainability of rural communities up to 2050 the SGP needs to provide a strategic response to these needs, so that more detailed proposals can be progressed via avenues such as the Leicestershire Rural Partnership and the LLEP Growth Plan.

5.189 However, as we stand, the SGP has yet to be 'rural proofed' and the impact on rural areas properly identified, assessed and addressed.

5.190 CPRE supports with some caveats the proposal (page 16) that there should be limited growth in villages and rural areas, consistent with providing for local needs, but that concept needs some expansion.

5.191 In our view the emphasis in rural areas should be on small scale developments linked to local need, particularly the provision of rural affordable housing, which enable local people to remain in their community.

5.192 To ensure rural communities remain thriving and sustainable there needs to be mix of property sizes, including smaller 2/3 bedroom and single storey properties.

5.193 Residents need to be enabled to downsize to remain in their communities.

5.194 In addition, the SGP should offer support for rural businesses to diversify in a sustainable way in keeping with their surroundings. The viability of local village facilities should be generally supported (though not as an excuse for inappropriately large housing development)

5.195 Rural communities should not fall behind in terms of the development of high quality digital connectivity and access to on-line services and in this regard we welcome the SGP commitment to these as an essential part of the future infrastructure of rural Leicestershire.

5.196 The provision of rural public transport, which is constantly under threat, should be underpinned. This should include future reviews of the County Council approach to its Passenger Transport Policy and Strategy. The current consultation, unfortunately, does not give us confidence, given current trends, for the future health of rural public transport[13].

5.197 All developments should be in keeping with the landscape and heritage of the local areas and developed through strong neighbourhood planning principles with the support of local people. Development should only be at a level which local villages can accommodate.

5.198 A large amount of agricultural land could be potentially affected by the projected housing growth and we are concerned by the rather dismissive view in the Sustainability Appraisal about the loss of best and most versatile agricultural land.

5.199 Referring the loss of agricultural land in the Northern and Southern Gateways and along the A46 corridor, for example, the Sustainability Appraisal states that: *'it is*

[13] https://www.leicestershire.gov.uk/have-your-say/current-consultations/consultation-on-passenger-transport-policy-strategy

unknown what proportion of this is best and most versatile land (3a), but much of the land does appear to be in use for agricultural purposes'.

5.200 And despite not knowing how much best and most versatile land is affected, the appraisal suggests that the negative effects *'would not be significant in the context of the overall amount of agricultural land still remaining and the avoidance of the most sensitive areas.'*

5.201 A similar statement is made about the loss of agricultural land at market towns and other rural settlements. Given that '*there could be a fairly large amount of agricultural land affected by growth'*, the conclusion that there would not be a significant loss in the context of the resources remaining across the Plan area does not appear to be evidenced.

5.202 And if the amount and quality of the land that will be lost is not known, a judgment on whether the loss is or is not significant cannot be made.

5.203 All this gives us cause for concern about the impact of the SGP on agriculture, despite its reference to nationally significant agriculture and food production. As part of a rural proofing exercise, the SGP needs to establish a clearer view of the impact of its proposals on the agricultural sector.

6. Sustainability Appraisal

6.1 We have already referred to the Sustainability Appraisal (SA) undertaken in a number of respects in relation to the SGP, however, it is worth briefly synthesizing our comments on this important document.

6.2 The SA admits to being based, at least in part, on subjective factors, something that is probably unavoidable, but, in our view, it consistently over emphasises (and perhaps exaggerates) the positives of the proposals while downplaying the negatives.

6.3 And, while the appraisal provides some greater clarity on particular impacts of the SGP, we are concerned that it does not fulfill the requirement of considering all reasonable options.

6.4 In particular, while it considers a housing level above the HEDNA values, it does not examine a lower figure nor does it consider a lower level of distribution warehousing.

6.5 In this respect (as well as several others) it seems to accept uncritically the position taken by the Strategic Planning Group[14], who were responsible for developing the plan, and only considers levels of development above what they are proposing.

6.6 Table 2.1 puts the position precisely saying: *'There is a need to meet needs for housing as identified in the HEDNA (2017).'* Para 3.1.5 confirms this by saying that Government policy is to meet OAN unless it has been demonstrated that is not possible. The report then affirms that the Strategic Planning Group say this isn't the

[14] The SPG is the officer group tasked with establishing the range of options for the growth and distribution of housing by the Member Advisory Group.

case. They do not test that position or consider whether that is realistic under different demographic and migration trends in the future.

6.7 This is, in our view, the wrong way round. Examples of evidence as to whether there are constraints on developments are set out in the NPPG in relation to Housing Land Availability[15]. These factors should have been tested by the Sustainability appraisal not assumed because of what the SPG say.

6.8 Moreover, the SA's approach to housing is highly mechanistic, assuming that the most important thing is how many houses are built, not whether the SGP is providing the right kind of affordable housing, whether first time buyers, young families, the homeless or those seeking homes to rent. It is essential to cater for the diverse needs of the future population, including the anticipated growth in elderly and disabled residents.

6.9 In relation to logistics in Table 2.1 the SA says: *'The County is well positioned for growth in the strategic distribution sector; though there is a need to identify the appropriate distribution of growth opportunities.'* Again this is an uncritical approach which does not consider the impacts of that level of provision on landscape, transport issues, air quality or carbon emissions.

6.10 In terms of transport Table 2.1 also starts from a questionable premise. It says: *'There may be constraints to the amount of development that can be accommodated on the edge or near the Leicester urban area in light of congestion along parts of the orbital road network.'* The term orbital is particularly strange, given that development would be occurring in areas where there is currently no strategic orbital network.

6.11 In fact the issue on that side of Leicester is congestion on the radial network, as we have set out above. While this statement can be read as an implicit justification for the A46 Expressway it ignores the actual evidence on transport in the LTP and at cordon points.

[15] NPPG: Housing Land Availability, Paragraph 044 (Reference ID: 3-044-20141006)

6.12 It also raises questions about the ability of the SA to determine the transport impacts of the plan given that there is still no detailed analysis of the impact of the proposals on radial routes into Leicester and hence the effect on congestion, air pollution, severance and the promotion of sustainable transport modes.

6.13 This problem is exacerbated by an assumption (set out clearly in the health and well-being section) that development in Leicester or on Urban Extensions will have negative impacts on air quality and other traffic related issues, whereas new settlements close to Leicester will be beneficial. The reality, of course, is that people who live in such nearby settlements will access Leicester for many of their needs using longer radial routes. They will also be less likely to use public transport (especially since no major public transport expansion to those areas is planned.)

6.14 This is acknowledged in the housing section which, in contradictory fashion, praises development on the A46 Expressway corridor in the hybrid options as helping *'to meet needs in close proximity to job opportunities in the City and the Northern and Southern Gateway'*. If such residents travel along existing congested routes into Leicester or generate new traffic to the Gateways they will inevitably increase long term problems of car dependency.

6.15 Ignoring the most obvious impacts of the Expressway the transport section concludes that: *'A large focus on new settlements along the A46 expressway ought to have significant benefits in terms of reducing trip lengths by placing new homes in areas of economic growth.'*

6.16 This simply does not match the experience of previous road schemes (as the CPRE 'End of the Road' report on road building explains) and is counter intuitive, since the A46 settlements will clearly increase commuter distances. This skewed analysis feeds into the far too rosy view of the hybrid proposal in the Climate Change section of the assessment.

6.17 The transport section does admit that *'this could also put pressure on routes into the City as the dominant mode of transport would likely be private car',* but nothing

is done to seriously address this issue, the main suggested mitigation being support for electric vehicles which would not address congestion.

6.18 In terms of landscape Table 2.1 refers to '*a variety of important landscapes which are important to the character of the countryside, preventing urban sprawl and supporting the natural environment. Whilst these are in relatively good condition, there are increasing pressures from development that need to be managed.'*

6.19 In our view this description applies most particularly to the relatively undisturbed areas of High Leicestershire along the route of the A46 Expressway where large scale housing is proposed.

6.20 The issue of sensitive landscapes is addressed to some degree in the landscape analysis in regard to new settlements but it is considered largely in relation to coalescence and agricultural land, even though the problem is clearly much more holistic.

6.21 The landscape section concludes, in relation to the hybrid option, that:

'Though there could be potentially major negative effects on landscape as a result of new settlements along the A46 corridor, Northern and Southern Gateways, it ought to be possible to secure mitigation.'

6.22 It does not say what this mitigation would be or how effective it would be and the truth is, particularly for High Leicestershire, that landscapes exist as a whole and that driving a road through such a landscape with large new housing settlements would inevitably damage that landscape, probably severely, however well they are screened.

6.23 Strangely, this impact is gradually downgraded. The hybrid gets two stars as opposed to the new settlements option which has three, even though both require very large impacts on High Leicestershire. Then in the options analysis on Page 88 we are told they are only minor negative impacts for the hybrid option in flat contradiction to the tables.

6.24 Two other matters in the SA are worth noting. Para 7.6.3 considers the impact of combining the various infrastructure projects in Midlands Connect and Housing Development.

6.25 It says that:

'The combination of effects from infrastructure schemes and strategic housing growth could therefore be more prominent when considered side-by-side.'

6.26 It goes on to say that:

'It is considered that significant effects on landscape and biodiversity should still be possible to avoid provided that; green infrastructure enhancement is a key principle of development, and; that Local Plans identify the most appropriate locations for strategic development based upon an assessment of sustainability implications.'

6.27 It is not made clear how landscape impacts in particular would actually be mitigated by such provisions, since neither is landscape-based. The reality, of course, is that such a level of development cannot be contemplated in such sensitive landscape locations without impacts that cannot be mitigated.

6.28 Para 7.4 .31 of the SA says:

'The Plan acknowledges rural areas as being nationally significant for agriculture and food production. However, there is no explicit strategy for the rural areas. By focusing growth away from the rural areas though, the Plan does offer a degree of protection for these industries. However, additional positive effects could be generated by setting a policy framework that supports the protection, diversification and modernisation of rural businesses.'

6.29 This later concept is welcome but there is no evidence it is being included in the plan, nor are rural industries or agriculture included in the consultation questions about the plan. We remain concerned that the plan does not sufficiently address the needs of rural industries.

7. Conclusions

7.1 In conclusion, Leicestershire CPRE recommends the following steps in producing the next iteration of a Strategic Growth Plan for Leicestershire:

- The plan should adopt much greater caution about any assessment beyond 2036. The plan should not seek to place numbers on development need beyond that point and acknowledge that demographic need may reduce.

- The overall housing need in the plan should be reviewed, seeking a more realistic assessment of need and a reappraisal of whether brown field and undesignated sites, particularly in urban areas, can help meet genuine housing need and reduce the need for housing on green field sites.

- The plan should include a greater level of detail about how affordable housing and housing for groups with special needs will be prioritised.

- There should be a review of support for major road building in the plan, taking account of the compelling evidence of induced traffic and the impact on local roads.

- Instead the plan should include broad proposals to deliver a range of local public transport improvements, linked to improved rail provision and demand management mechanisms.

- There should be a wider analysis of the need for large industrial sites in the plan, particularly logistics, with proper account taken of NIC proposals and competing proposals in adjoining regions so that a maximum level of provision can be identified which takes account of the environmental and transport impacts of over-provision.

- The plan should put more emphasis on the rural economy and farming including initiatives to help the rural economy to diversify in a way which does not harm the local environment.

- The plan needs to be rural proofed with specific policies to support villages and communities to enhance their local areas.

- The plan needs a much stronger commitment to promote the landscape, environmental and heritage assets of the county, and to stop referring to them as 'constraints'. The fifth pillar needs to be expanded significantly to take account of the high landscape value of many areas of the county, such as High Leicestershire.

In our view the Sustainability Appraisal needs to reassess the Draft SGP, including an option for lower levels of growth. The landscape assessment also needs to be reviewed to include all elements of the plan, importantly the A46 Expressway, and a proper assessment of the potential transport and climate impacts of the proposals.

We also consider it essential that there is wider engagement with the public and wider stakeholders in the development of this plan. We urge the Councils to seek an Examination in Public (EIP) to test the impacts of the SGP in a formal setting.

Appendix A:

Specific Responses to Strategic Growth Plan Consultation Questions

Note:

CPRE consider the SGP Questionnaire to be limited in its approach so our response to the questions needs to be read in the light of our overall response. Where possible we include cross-references to make that easier.

Question 4: Key Priorities

To what extent do you agree or disagree with the four priorities identified in the draft plan?

Strongly Disagree

Why do you say this? Are there any other priorities you think should be included?

Overall, the stated priorities are too mechanistic, relying on predictions of growth which are uncertain.

While the second two goals appear worthy, the interpretation of what is essential and high quality is based on a car dependent and dispersed approach.

Furthermore, in writing the questionnaire and summarising the four priorities all reference to environmental priorities has been lost.

In the Consultation Draft Priority 1 says: creating conditions for investment and growth - ***balancing the need for new housing and jobs with protection of our***

***environment and built heritage**. Priority 4 says: **maintaining the essential qualities of Leicester & Leicestershire and** delivering high quality development.*

A question could have been framed to assess the scale of support for growth versus environment protection. But all reference to environment, landscape and heritage is lost from the questionnaire.

The four priorities are limited and do not take account of either the social or environmental impacts of the plan. There should be specific and tangible goals to improve the environment, addressing the landscape, biodiversity and pollution and climate change in particular. There should also be a priority to protect our heritage assets, as well as health and well-being goals. These should be considered as equally important and this should be demonstrated in the Plan. (See section 5 (d) of our response)

There should be a priority about meeting specific housing need, e.g. building affordable housing, building single storey homes for older people (a County Council priority), ensuring that existing housing stock for rental is habitable and putting in place measures to meet the needs of homeless people. What is presented is all about the market and doesn't appear to address real needs at all. (See section 5 (a) of our response)

There should also be a priority for planned renewable energy but only in appropriate places.

Question 5: The Primary Growth Areas

To what extent do you agree or disagree with the proposed corridor of growth around the south and east of Leicester linked to the construction of a new A46 expressway?

Strongly Disagree

Why do you say this?

We consider that the question is leading in that the wording leads you towards accepting the existence of major road building.

It is worrying that the Sustainability Assessment does not consider the impact on landscape of major road building proposals. In the case of the A46 Expressway proposal which is described in the Plan (page. 14) as 'absolutely critical to our draft strategy'*, the lack of such an assessment is, in our view, a very serious omission. (See section 6 of our response)*

The proposed A46 expressway would not resolve congestion in Leicester but would exacerbate it. The road would encourage new induced traffic which would undermine use of sustainable transport modes and lengthen journeys. This would contradict the need to reduce C02 emissions. In particular it would add to congestion problems on already busy roads into Leicester. This would be made worse by the lack of serious investment in alternative transport provisions or demand management proposals for cars and wooly statements in the SGP about how this will be dealt with. With regard to Climate Change targets and the need to reduce pollution we do not think that building a major road through the countryside is visionary or indeed sensible. (See section 5 (b) of our response)

Additional housing provision along the route would only exacerbate this and the assumption that such estates can be made less car dependent when they act as a commuter belt to Leicester is self-contradictory.

The impact of the route on the local environment would be severe, with particular impacts in areas of high landscape value and relative tranquility in High Leicestershire. These assets should be protected and promoted, both for local and wider enjoyment, not destroyed. (See section 5 (d) of our response)

We explain in much more detail in our main assessment why we have concerns about housing need calculations in the Plan, Transport proposal, economic development figures, as well as impact on the environment, heritage and health.

Question 6: Role of Leicester

To what extent do you agree or disagree with the proposal that Leicester should develop its role as the 'central city'?

Neither Agree nor Disagree

Why do you say this?

We agree that Leicester should act as an economic as well as a social hub for the county. It should be supported in developing as an attractive centre with world class facilities seeking a high degree of good design and using land as well as possible while keeping its historic and environmental character. This needs to be supported by public transport and investment in other sustainable transport modes so the city can improve its air quality and reduce CO2 emissions.

However, this should not be at the expense of the vitality and viability of the other settlements in the county and the local authorities need to pursue a balanced approach in areas such as leisure, retail, culture and employment which ensures that each centre fulfils its distinct role within the hierarchy of settlements. This will help to minimize Climate Change impacts. In terms of housing, this means seeking brownfield opportunities across the county, as a first step, including regeneration in areas such as Coalville which are currently less attractive.

Question 7: The Secondary Growth Area

To what extent do you agree or disagree with the two gateways identified

Northern Gateway: ***Tend to Agree***

Southern Gateway: ***Tend to Agree***

Why do you say this?

In terms of the identification of the Gateways we are supportive of that approach (although we consider the overall need is exaggerated.)

Within both Gateways there are opportunities for brownfield development which should be exploited before green field sites are identified.

There are concerns about the potential level of logistics development given the issues of double-counting identified in our overarching comments and this may also impact on some of the assumptions made by local authorities about housing to support those developments. (See section 5 (c) of our response)

The primary areas where development should occur should be within the existing urban areas, especially where regeneration and affordable housing need is highest.

Beyond that, the location of any additional need should take account of both landscape and biodiversity restraints and must be linked to public transport routes.

Without more detail of what is actually proposed for each of these growth areas, it is difficult to comment further other than to point to a few features, as examples, of what we see as important to landscape character of each area.

For example, in the Northern Gateway we would identity the historic character of villages, such as Diseworth and Long Whatton.

Although we accept that the landscape of the Southern Gateway is already 'strongly influenced by human activity and development'*, there are also important landscape features such as the ecological corridor and Conservation Area along the Ashby Canal.*

Are there any other gateway locations you think should be included?

No.

Question 8: Lutterworth and Melton Mowbray as Key Centre

To what extent do you agree or disagree with these two settlements being identified as key centres?

Melton Mowbray: ***Tend to Agree***

Lutterworth: ***Tend to Agree***

Why do you say this?

We agree with the designation of Melton Mowbray but are concerned about the level of development (within the context of our wider concerns about housing need assumptions) but believe it is an appropriate location for some development. Any development must protect the nationally designated River Eye SSSI.

We disagree that the proposed A46 expressway has a significant bearing on the development of Melton Mowbray as a Key Centre. It is not a prerequisite for Melton becoming more accessible and we do not understand why this assumption has been made.

We are also concerned about the Melton Distributor Road and the potential for development along that corridor which is not well served by public transport. We remain concerned that the expansion of Melton could be unplanned and impact adversely on landscape and biodiversity.

In the case of Lutterworth we believe the town fits with the concept of the Southern Gateway but any expansion needs to take account of the impact on the landscape and biodiversity as well as important features, such as the historic village of Bitteswell.

Are there any alternative key centres you think should be included?

No

Question 9: Managed Growth

To what extent do you agree or disagree with the proposal that Coalville, Hinckley, Loughborough and Market Harborough should have 'managed growth' only?

Coalville: ***Tend to Disagree***

Hinckley: ***Tend to Disagree***

Loughborough: ***Agree***

Market Harborough: ***Agree***

Why do you say this?

The term 'managed growth' is imprecise. This seems to imply a smaller scale of development than has occurred in recent years. But it is far from clear what level of development is needed to support town centre regeneration and better services. The needs of each market town are different.

In the case of Loughborough and Market Harborough growth should be limited to regeneration and town centre improvements.

With regard to Hinckley and Coalville, there is a need to address issues of deprivation and regeneration and to ensure there are the right policies to encourage new investment, job creation and improvements to environmental and amenity quality. Growth should focus on regeneration, town centre improvements, public transport initiatives and affordable housing.

Within this context there is a need to support delivery. We are particularly concerned about assumptions that housing cannot be delivered, particularly in Coalville, as this can become a self-fulfilling prophecy which denies much needed housing in those towns while increasing pressure on countryside elsewhere.

Question 10: Growth in Villages and Rural Areas

To what extent do you agree or disagree that growth in our villages and rural areas should be limited to providing for local needs

Strongly Agree but with caveats

Why do you say this?

We strongly agree – subject to a qualifying statement broadly as follows:

In rural areas the emphasis of the SGP should be on small scale developments, with a stronger emphasis on Rural Affordable Housing, linked to local need.

This should be developed through strong neighbourhood planning principles with the support of local people. It is notable that where there are Neighbourhood Plans in place identified need is consistently for smaller 2/3 bedroom homes as well as affordable homes and single storey properties to enable downsizing.

Development should be at a level which a local village can accommodate but without any development in villages there is a risk of pushing out young families and forcing older people to relocate to downsize.

The viability of local village facilities should be generally supported (but not as an excuse for inappropriately large housing development) and the provision of rural transport needs should also be supported.

Where affordable housing is provided it needs to be in keeping with the landscape and heritage of the area.

The SGP should support the diversification of rural businesses in a sustainable way and in keeping with their surroundings. (See section 5 (e) of our response)

Question 11: Other Comments on Plan

We are concerned about the lack of awareness of the consultation and problems responding. We have heard from people who have struggled to get the form to make a hard copy response (a 15 minute wait at County Hall while the front desk located a hard copy form).

We are concerned that this is a non-statutory plan which has not been subject to the rigorous consultation procedures with stakeholders and residents that even a Neighbourhood Plan must undertake, and that it is not subject to inspection. We consider the evidence behind the Plan to be scanty. In some cases it had not been

posted at the outset of the consultation (in fact the Transport 'evidence' was not published until almost 3 months into the consultation). (See section 3 of our response)

We are concerned that the Expressway (on which the plan hangs) is being promoted without either a business case or a detailed route plan, both of which make it hard for respondents to make informed comments. (See section 5 (b) of our response)

We are concerned about the timescales for the plan. Having to comment on something such a long time before it might/would be implemented is necessarily difficult. How can we know what the demands might be in the future? We are worried that once the SGP is adopted it will be considered binding on local authorities and drive further development allocations, beyond what is needed for local plans. (See section 3 of our response)

We are also particularly concerned that the plan will not be subject to a public inquiry where the evidence can be formally tested. (See section 3 of our response)

Appendix B:

CPRE Report on the HEDNA

(November 2017)

LEICESTERSHIRE ANALYSIS OF HOUSING AND ECONOMIC DEVELOPMENT NEEDS ASSESSMENT

Report to CPRE Leicestershire

Gerald Kells

November 2017

1. Background

1.1 I was asked by Leicestershire CPRE to assess the implications of the Housing and Economic Development Needs Assessment (HEDNA) for Leicestershire and its relationship to the emerging Strategic Growth Plan for Leicestershire (SGP).

1.2 This report considers the HEDNA and should be read alongside my parallel report on the SGP.

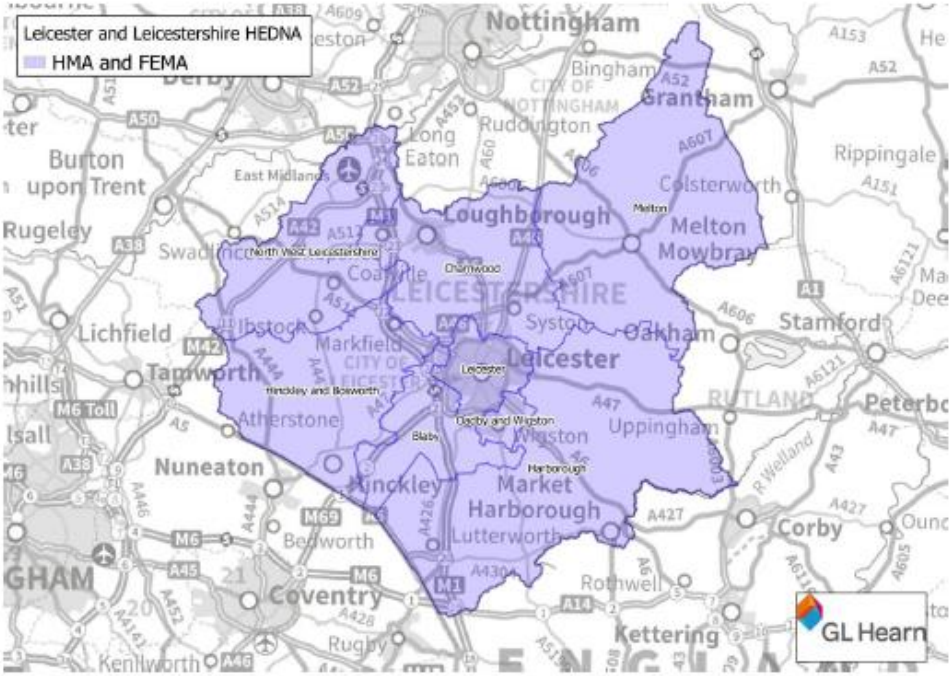
1.3 The HEDNA was undertaken by GL Hearn on behalf of a consortium of Local authorities in Leicestershire and seeks to assess the overall housing need, the need for affordable housing as well as for specific types of houses, the need for office, industrial and logistics space. It does this over a period from 2011-2036 and also 2011-2031 to take account of the relative stage of development of local plans.

1.4 Para 1.14 of the HEDNA explains that 'This is intended to be taken forward through joint working to prepare a Memorandum of Understanding (MOU) on the distribution of housing between authorities within the HMA, and on work moving forwards to develop a Strategic Growth Plan.'

1.5 There are eight local plans covering Leicestershire. Some are early in their review period but in the case of Melton and North West Leicestershire the plans are at a stage where it has been necessary to reassess their housing need based on the HEDNA results and I also consider the potential implications of their view of the HEDNA results and potential implications for the other emerging plans.

1.6 It is worth also noting that the HEDNA assumes both the Housing Market Area (HMA) and Functional Economic Market Area (FEMA) are the same as the county boundaries and the HMA is reasonably self-contained.

Figure 1: **HMA and FEMA**



Source: GL Hearn, 2016

1.7 The HEDNA report considers first the housing need assessment, then compares it to the 2014 Strategic Housing Market (SHMA) outputs and the 2017 Department for Communities and Local Government (DCLG) consultation on Objectively Assessed Housing Need (OAN). It also considers reports from North West Leicestershire and Melton in relation to the HEDNA OAN.

1.8 The report then considers the employment land need assessment

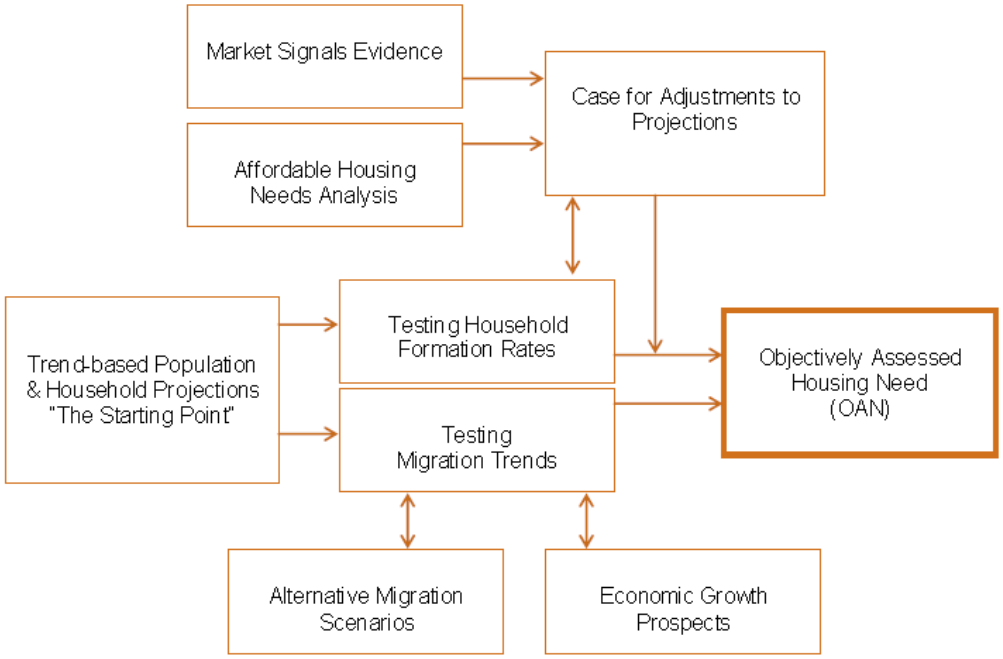
2. Housing Need

2.1 The process of coming to an Objectively Assessed level of Housing need (OAN) is usefully set out in the HEDNA at Figure 2. Although the OAN is presented as a single figure for each time frame (with lower figures for each local authority) it is important to understand that this is a construct and that a large amount of professional judgment, as well as uncertainty, has gone into the calculation.

2.2 It is also important to stress that the resulting figures in this case are higher than the Government's latest household projections. This is common in many housing need assessments, some even admitting there has been or is a risk of double counting.

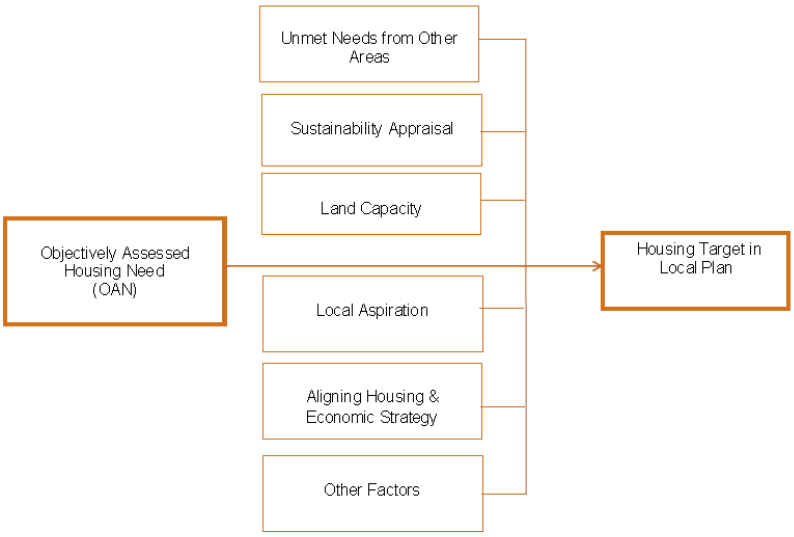
2.3 These figures are also likely to be adjusted downwards as the recently published 2016 Office of National Statistics (ONS) national population projections, from which future projections will be derived, reduce both the projection of international migration and fertility.

Figure 2: **Overview of Methodology for Assessing Housing Need (OAN)**



2.4 The OAN should not, even if it is correct, be considered the housing requirement for local authorities which is required under Para 045 of the Housing and Economic Land Assessment section of the National Planning Policy Guidance (NPPG)) to consider constraints on meeting assessed housing need, including Green Belt and environmental issues. Figure 3 explains this process but refers to these elements only as 'other factors'.

Figure 3: **Considerations in Formulating Housing Targets in Local Plans**



2.5 The starting point for the assessment is the existing population growth. This amounts to 124,900 since 2001, approximately 14%. 3,500 per annum results from natural change (births versus deaths) and 4,500 from the balance of migration, 4,300 of which comes from

international migration. There is also a degree of unattributable population growth (UPC). This is the result of discrepancies between the 2001 and 2011 censuses but the assessment discounts this (as is recommended by DCLG) since it is considered unlikely to reflect future trends.

2.6 The other noticeable trend is a disproportionate increase in older people, reflecting the aging population as well as some increases in young adults, possibly resulting from the migration trend.

2.7 The assessment projects population growth forward on the basis of the (at the time) most recent ONS population and household projections to 2036. This leads to an estimated population growth of 191,600 (19.5%) and a slightly higher 20.7% rise in households, resulting mainly from a decrease in household size with an aging population. Assuming 3.6% of homes are vacant this leads to a need for 4081 dwelling per annum.

Table 3: Starting Point (2014-based) Population and Household Projections, 2011-36

	Population 2011	Population Growth, 2011-36	% Population Growth	Change in households	% Household Growth
Leicester	329,627	69,656	21.1%	29,518	24.0%
Blaby	94,132	15,115	16.1%	5,575	14.4%
Charnwood	165,876	46,430	28.0%	18,837	28.3%
Harborough	85,699	17,041	19.9%	8,088	23.1%
Hinckley & Bosworth	105,328	17,548	16.7%	7,615	16.7%
Melton	50,495	6,707	13.3%	3,106	14.4%
North West Leicestershire	93,670	14,143	15.1%	6,072	15.5%
Oadby & Wigston	55,979	4,924	8.8%	1,967	9.2%
HMA	980,806	191,564	19.5%	80,778	20.7%
East Midlands	4,537,448	733,509	16.2%	335,623	17.7%
England	53,107,169	9,296,779	17.5%	4,394,788	19.9%

Source: ONS/ CLG 2014-based Population and Household Projections

2.8 It is worth noting that the 2014 projections assumed a significantly higher rate of international migration than the previous 2012 projections. This fed into higher estimates of need, but is, of course, always subject to Government policy and the actions of individuals, which will be influenced by factors such as Brexit, the value of the pound and other economic and social factors. This seems to be reflected in the lower 2016 figures.

2.9 It is also worth noting the variability across the region with the largest need in Leicester and Charnwood.

2.10 The assessment goes on to consider two alternative scenarios using the Mid-Year Estimates and Ten Year Migration Patterns. The later is often used in such assessments because it is seen as leveling out variation in migration over time, although it clearly suffers from reliance on past trends which may change in the future. The 10 Year Migration approach leads to a higher population with higher growth particularly in both the younger age groups and the elderly.

Table 5: Projected Population Growth (2011-2036) – HMA

	Population 2011	Population 2036	Change in population	% change
2014-based SNPP	980,806	1,172,369	191,563	19.5%
2014-based SNPP (+MYE)	980,806	1,175,612	194,806	19.9%
10-year migration	980,806	1,182,229	201,423	20.5%

Source: Demographic projections

Table 6: Projected Population Growth (2011-2031) – HMA

	Population 2011	Population 2031	Change in population	% change
2014-based SNPP	980,806	1,140,431	159,625	16.3%
2014-based SNPP (+MYE)	980,806	1,143,698	162,892	16.6%
10-year migration	980,806	1,148,710	167,904	17.1%

Source: Demographic projections

2.11 To convert these figures to numbers of households the assessment then considers the future headship rate for households in the area, the measure that, along with the age profile, determines household size. Household size it appears has been leveling off. This is partly because of household suppression for economic reasons but may also reflect a longer term flattening out of household size in many age groups. However, the aging of the population is likely to lead to some decrease of housing size in the area.

2.12 A further adjustment is made to allow for vacant homes, which are currently running at 3.6% across the HMA.

Table 11: Projected housing need – range of demographic based scenarios and 2014-based headship rates – HMA (2011-36)

	Households 2011	Households 2036	Change in households	Per annum	Dwellings (per annum)
2014-based SNPP	390,910	489,390	98,480	3,939	4,081
Rebased SNPP	390,910	491,027	100,117	4,005	4,149
10-year migration	390,910	493,820	102,910	4,116	4,265

Source: Demographic projections

Table 12: Projected housing need – range of demographic based scenarios and 2014-based headship rates – HMA (2011-31)

	Households 2011	Households 2031	Change in households	Per annum	Dwellings (per annum)
2014-based SNPP	390,910	471,663	80,753	4,038	4,183
Rebased SNPP	390,910	473,126	82,216	4,111	4,259
10-year migration	390,910	475,225	84,315	4,216	4,368

Source: Demographic projections

2.13 The resulting figures create a range of household need between 4,081 houses per year and 4,265 based on a 2036 end date. The figures are higher with a 2031 date because migration is assumed to tail off. GL Hearn considers the higher 10 year migration figure to be the more robust. In most cases (excluding Charnwood and Melton) this also leads to a higher local authority figure.

Table 13: Projected housing need – range of demographic based scenarios and 2014-based headship rates – by local authorities

		2014-based SNPP	2014-based SNPP (+MYE)	10-year migration
Leicester	2011-31	1,527	1,530	1,538
	2011-36	1,504	1,510	1,516
Blaby	2011-31	286	289	308
	2011-36	278	281	301
Charnwood	2011-31	981	1,003	982
	2011-36	950	969	947
Harborough	2011-31	418	433	463
	2011-36	402	415	447
Hinckley & Bosworth	2011-31	394	400	428
	2011-36	377	382	413
Melton	2011-31	161	154	140
	2011-36	156	150	134
NWL	2011-31	314	336	386
	2011-36	304	323	378
Oadby & Wigston	2011-31	104	113	123
	2011-36	110	119	129
HMA	2011-31	4,183	4,259	4,368
	2011-36	4,081	4,149	4,265

Source: DCLG 2016 (all figures persons per annum)

2.14 The report goes on to compare these figures with the economic needs of the county. It shows that the economy has grown since 1991 both in terms of GVA and employment, although this has been against a backdrop of a decline in manufacturing and there are regional variations. It is largely a growth in administration that has offset the manufacturing jobs decline.

2.15 The report uses the Oxford Economics model to forecast future growth. This disaggregates national trends to local authorities by sector, but also allows population movement to respond to economic changes. A baseline figure is produced based on 2.3% economic growth continuing in the HMA, slightly higher than in the region.

Table 17: Baseline Forecasts Per Local Authority (2011-2036)

Future Growth (baseline)	GVA Growth 2011-36 (CAGR)	2011-2036 Job Increase	% Change in Employment, 2011-36	Employment Growth 2011-36 CAGR
Leicester	1.9%	11,700	6.8%	0.3%
Blaby	2.7%	14,500	26.5%	1.2%
Charnwood	2.2%	13,200	19.4%	0.9%
Harborough	2.7%	9,200	21.3%	1.0%
Hinckley and Bosworth	2.7%	8,000	17.3%	0.8%
Melton	1.9%	1,200	4.9%	0.2%
North West Leicestershire	2.4%	10,900	19.6%	0.9%
Oadby and Wigston	1.6%	-500	-2.1%	-0.1%
FEMA	2.3%	70,800	14.6%	0.6%

Source: Oxford Economics, 2016 (numbers may not sum due to rounding)

Table 18: Baseline Employment Forecasts Per Local Authority (2011-2031)

Future Growth (baseline)	2011-2031 Job Increase	% Change	CAGR
Leicester	9,300	5.4%	0.2%
Blaby	16,400	29.9%	1.1%
Charnwood	12,900	18.9%	0.7%
Harborough	10,500	24.1%	0.9%
Hinckley and Bosworth	8,500	18.3%	0.7%
Melton	1,200	4.9%	0.2%
North West Leicestershire	12,400	22.3%	0.8%
Oadby and Wigston	-200	-1.1%	0.0%
FEMA	68,200	14.1%	0.7%

Source: Oxford Economics, 2016

2.16 A second figure is then created based on planned growth, that is to say taking account of existing plans for growth in each local authority as opposed to further aspirational growth targets. This increases economic growth to 2.5%, higher in some areas.

Table 19: Employment Growth Scenarios, 2013-36

	1993-2010	Baseline 2011-36		Planned Growth 2011-36	
	% pa	No.('000s)	% pa	No. ('000s)	% pa
Leicester	-0.3%	9.3	0.2%	20.7	0.5%
Blaby	1.4%	16.4	1.1%	16.5	1.1%
Charnwood	0.0%	12.9	0.7%	18.5	1.0%
Harborough	1.8%	10.5	0.9%	10.8	0.9%
Hinckley and Bosworth	0.5%	8.5	0.7%	11.4	0.9%
Melton	0.9%	1.2	0.2%	2.4	0.4%
North West Leicestershire	1.9%	12.4	0.8%	19.2	1.2%
Oadby and Wigston	-0.3%	-0.2	0.0%	-0.2	0.0%
HMA	0.4%	70.8	0.5%	99.2	0.7%
East Midlands	0.8%		0.5%		0.5%
UK	0.8%		0.7%		0.7%

2.17 This is then converted into jobs growth.

Table 20: Differences Job growth in Baseline and Planned Growth Scenario

	2011-2031			2011-2036		
	Baseline	Planned Growth	Difference	Baseline	Planned Growth	Difference
Leicester	11,700	20,400	8,700	9,300	20,700	11,400
Blaby	14,500	15,100	700	16,400	16,500	100
Charnwood	13,200	17,700	4,400	12,900	18,500	5,600
Harborough	9,200	9,500	300	10,500	10,800	300
Hinckley & Bosworth	8,000	10,800	2,800	8,500	11,400	2,900
Melton	1,200	2,200	1,000	1,200	2,400	1,300
NWL	10,900	16,700	5,800	12,400	19,200	6,800
Oadby & Wigston	-500	-400	100	-200	200	400
FEMA	68,200	91,900	23,700	70,800	99,200	28,400

*Source: Oxford Economics, 2016 * Numbers may not add due to rounding*

Table 24: Planned Growth Scenario by Different Time Periods (jobs)

	2011-2015	2015-2031	2015-2036
Leicester	11,800	8,500	8,800
Blaby	6,400	8,700	10,100
Charnwood	9,600	8,100	8,900
Harborough	3,100	6,400	7,600
Hinckley & Bosworth	4,000	6,900	7,400
Melton	300	1,900	2,200
North West Leicestershire	3,700	13,000	15,500
Oadby & Wigston	-1,200	800	1,000
FEMA	37,600	54,300	61,500

Source: Oxford Economics, 2016

2.18 The planned growth forecast calculates a growth of 91,200 jobs for the period 2011-31 and 99,200 jobs for the period 2011-2036, a level of growth at a FEMA level which exceeds that seen historically and 28,400 more than the baseline.

2.19 Translating this into housing need is fraught with risks. As Para 5.3 of the HEDNA admits:

'Clearly it would be illogical for an area to increase population growth above the levels shown in trend-based demographic projections (and hence increase housing need) through increased in-migration without consideration of the impact this would have on other locations (where an increase in out-migration might be expected). Economic evidence therefore needs to be treated with a degree of caution, and a recognition that ultimately economic factors are a potential influence on the distribution of development in particular.'

2.20 The HEDNA then considers a number of factors which may impact on employment rates and their distribution, including commuting patterns, second jobbing and employment rates. The resulting population needs are all lower than the demographic rates or just marginally higher.

Table 30: Economic Led Housing Need (2011-2031)

	Households 2011	Households 2031	Change in households	Change in households Per annum	Dwellings per annum
Leicester	123,029	144,274	21,245	1,062	1,099
Blaby	38,771	45,279	6,507	325	334
Charnwood	66,449	82,027	15,578	779	812
Harborough	35,077	43,893	8,816	441	456
Hinckley & Bosworth	45,502	54,542	9,039	452	467
Melton	21,560	25,154	3,594	180	186
NWL	39,234	48,535	9,302	465	481
Oadby & Wigston	21,288	23,728	2,440	122	129
HMA/FEMA	390,910	467,431	76,521	3,826	3,963

Source: GL Hearn, 2016

Table 31: Economic Led Housing Need (2011-2036)

	Households 2011	Households 2036	Change in households	Change in households Per annum	Dwellings per annum
Leicester	123,029	147,013	23,984	959	993
Blaby	38,771	46,074	7,302	292	300
Charnwood	66,449	84,090	17,640	706	735
Harborough	35,077	45,308	10,230	409	423
H&B	45,502	55,511	10,008	400	414
Melton	21,560	25,679	4,119	165	170
NW Leics	39,234	50,051	10,818	433	448
Oadby & Wigston	21,288	24,270	2,983	119	126
HMA/FEMA	390,910	477,996	87,086	3,483	3,608

Source: GL Hearn, 2016

2.21 The economic forecast results on a lower figure of 3608 to 2036, as opposed to the demographic trend predictions of 4265. The report suggests this may not mean less houses are needed but may lead to a lower economic participation rate, although this does not easily square with the assumption in the Oxford Economic modelling that migration will follow jobs or seem necessarily desirable.

2.22 It is also noticeable that the North West Leicestershire and Melton both have significantly higher levels of housing need so the distribution of need is different.

3. Affordable Housing

3.1 The affordable housing need has been calculated based on a simple formula for those who will fall into need. The resulting figures 2,238 per annum for the 2036 time period.

Net Need = Current Need + Need from Newly-Forming Households + Existing Households falling into Need – Supply of Affordable Housing

Table 37: Estimated level of Affordable Housing Need – HMA

	Per annum (2011-2031)	Total 2011-2031	Per annum (2011-36)	Total 2011-36
Current need	422	8,433	337	8,433
Newly forming households	3,410	68,200	3,410	85,246
Existing households falling into need	1,862	37,240	1,862	46,540
Total Gross Need	5,693	113,873	5,609	140,218
Supply from existing stock	3,371	67,420	3,371	84,271
Net Need	2,322	46,453	2,238	55,947

Source: Census (2011)/CoRe/Projection Modelling and affordability analysis. (numbers may not add up due to rounding)

Table 38: Estimated level of Net Affordable Housing Need per annum – by HMA and local authority - (2011-36)

	Current need	Newly forming households	Existing households falling into need	Total Need	Supply from existing stock	Net Need
Leicester	207	1,330	971	2,508	1,774	734
Blaby	19	321	113	452	184	268
Charnwood	33	576	240	848	464	384
Harborough	14	250	80	343	141	202
H&B	20	342	163	525	278	247
Melton	11	139	81	231	160	70
NWL	19	298	174	491	297	194
Oadby & Wigston	16	155	40	210	71	139
HMA	337	3,410	1,862	5,609	3,371	2,238

Source: 2011 Census/CoRe/Projection Modelling and affordability analysis (numbers may not add up due to rounding)

Table 39: Estimated level of Affordable Housing Need per annum – by HMA and local authority - (2011-31)

	Current need	Newly forming households	Existing households falling into need	Total Need	Supply from existing stock	Net Need
Leicester	259	1,330	971	2,560	1,774	786
Blaby	23	321	113	457	184	273
Charnwood	41	576	240	857	464	392
Harborough	18	250	80	347	141	206
H&B	24	342	163	530	278	251
Melton	14	139	81	234	160	73
NWL	24	298	174	496	297	199
Oadby & Wigston	19	155	40	214	71	143
HMA	422	3,410	1,862	5,693	3,371	2,322

Source: 2011 Census/CoRe/Projection Modelling and affordability analysis (numbers may not add up due to rounding)

3.2 To meet this need in full out of the current trend figures would require a percentage of affordable housing delivery from market housing which is unlikely to be achievable. The HEDNA suggests that to achieve that delivery of affordable housing would require 9,293 hpa up to 2036, double the demographic need. Even if such a figure could be achieved it would have significant impacts in terms of where those extra households would come from and where they would work. Furthermore, a number of legal challenges and Inspector's judgments do not suggest this is the correct benchmark, (as is detailed in the HEDNA).

3.3 The report also identifies a number of problems with such a comparison. Some affordable housing need will be met through the private rented sector and the modelling includes households already in affordable housing who may not contribute to net overall need.

Table 40: Notional Housing Need to deliver the Affordable Housing Need (per annum, 2011-36)

	Demographic-led Housing Need pa	Net Need for Affordable Housing pa (AHN)	Potential Delivery (% Total Dwellings)	Notional Housing Provision Required to Deliver AHN
Leicester	1,516	734	20%	3670
Blaby	301	268	25%	1072
Charnwood	947	384	30%	1280
Harborough	447	202	31%	652
Hinckley & Bosworth	413	247	25%	988
Melton	134	70	25%	280
North West Leicestershire	378	194	27%	719
Oadby & Wigston	129	139	22%	632
HMA	4,265	2,238		9,293

3.4 The issue is further complicated by the uncertainty relating to the implication of the Housing and Planning Act, such as the extension of Right to Buy which may impact on affordable need and supply.

Table 43: Gross need for Intermediate and affordable/social rented housing – by local authority

	Intermediate housing	Social/Affordable rented
Leicester	19%	81%
Blaby	20%	80%
Charnwood	23%	77%
Harborough	23%	77%
Hinckley & Bosworth	21%	79%
Melton	20%	80%
NWL	20%	80%
Oadby & Wigston	21%	79%
HMA	20%	80%

Source: Affordable Housing Needs Analysis

3.5 The report considers in detail the level of intermediate housing, that is to say housing which aims to get people onto the housing market. This requires both a level of income and a deposit. Using income as a proxy the report concludes that the level of intermediary housing will be approximately 20% of the overall affordable housing need.

3.6 Separately the report considers the need for starter homes which local authorities are now required to promote. Based on a 20% reduction on the market price it concludes that these would only be affordable for the highest earners in the under 40 age groups. And on the same assumption it concludes that there is a need for 654 homes to be starter homes by 2036, but that this would not alleviate the need for affordable homes. A figure is also given to 2020 which is based on the Government's commitment to build 2 million starter homes by that date. In reality the report suggest 20% of homes should be starter homes.

Table 47: Total annual need for Starter Homes by Local Authority

	2015-2031	2015-36	2015-20
Leicester	294	253	668
Blaby	79	71	154
Charnwood	96	84	210
Harborough	60	54	118
Hinckley & Bosworth	83	74	167
Melton	38	33	77
North West Leicestershire	62	55	128
Oadby & Wigston	33	29	66
HMA	745	654	1,588

3.7 In terms of size of properties the report breaks these down for both market and affordable housing. In general market housing is considered to require larger properties. It is also generally assumed that the need for smaller houses will increase due to demographic change, particularly the aging of the population. This raises some question, especially as it may be that older people do not want to move into single bed accommodation and may need rooms for carers.

Table 54: Local Authority Modelling Outputs – Market Housing

	1-bedroom	2-bedrooms	3-bedrooms	4+ bedrooms
Leicester	8%	24%	53%	15%
Blaby	3%	32%	57%	7%
Charnwood	5%	29%	47%	19%
Harborough	5%	33%	40%	21%
Hinckley & Bosworth	4%	39%	48%	9%
Melton	4%	32%	55%	9%
NWL	3%	35%	52%	10%
Oadby & Wigston	5%	37%	52%	7%
HMA	6%	29%	50%	15%

Source: Housing Market Model

Table 56: Local Authority Modelling Outputs – Affordable Housing

	1-bedroom	2-bedrooms	3-bedrooms	4+ bedrooms
Leicester	42%	26%	28%	4%
Blaby	50%	36%	13%	1%
Charnwood	49%	21%	28%	3%
Harborough	43%	35%	21%	2%
Hinckley & Bosworth	36%	38%	24%	1%
Melton	51%	34%	14%	1%
NWL	36%	36%	26%	2%
Oadby & Wigston	44%	27%	28%	2%
HMA	43%	29%	25%	3%

Source: Housing Market Model

	1-bed	2-bed	3-bed	4+ bed
Market	0-10%	25-35%	45-55%	10-20%
Social/Affordable Rented	35-40%	25-30%	25-30%	5-10%
Intermediate/Starter Homes	15-20%	50-55%	25-30%	0-5%

3.8 Identifying housing size is obviously quite a broad brush approach which may not address the more specific needs of people but the report does address in some detail those needs, particularly for a growing elderly population, something the Government promised additional guidance on in the housing and planning white paper.

3.9 The number of people over 65 in the HMA is expected to increase by 75% in the period up to 2036. Meanwhile there is an expected 107% rise in dementia and 91% in mobility issues. At present the majority of provision is in the affordable sector, but clearly this challenge will increase the requirement across the board.

Table 63: Current Supply (Stock) of Specialist Housing for Older People

Type of housing	Market	Affordable	Total	Supply per 1,000 aged 75+
Sheltered	1,424	4,705	6,129	85
Extra Care	167	360	527	7
Total	1,591	5,065	6,656	92

Source: Housing LIN

3.10 The projected need is then calculated on the basis of 170 specialist places per 1000 population (currently 92 per 1000).

Table 64: Projected need for Specialist Housing for Older People (2011-36)

	Population aged 75+ (2011)	Population aged 75+ (2036)	Change in population aged 75+	Specialist housing need (@ 170 units per 1,000)	Per annum need (2011-36)
Leicester	18,429	32,296	13,867	2,357	94
Blaby	7,800	15,118	7,318	1,244	50
Charnwood	13,045	26,017	12,972	2,205	88
Harborough	7,200	16,501	9,301	1,581	63
H&B	8,846	18,409	9,563	1,626	65
Melton	4,302	8,974	4,672	794	32
NWL	7,293	15,126	7,833	1,332	53
O&W	5,584	9,574	3,990	678	27
HMA	72,499	142,014	69,515	11,818	473

Source: Derived from demographic projections and Housing LIN

3.11 This suggests a significant need for specialist accommodation. However, this is clearly an area where policy and attitudes are changing and there is an emergence of sheltered housing products aimed at market buyers which seek to reduce the stigma of specialist housing which may increase the opportunities and needs in this area, potentially releasing other under-used stock.

3.12 The report also consider wheelchair access and suggests that 3% of new homes may need wheelchair access, 4322 up to 2036. Again, this is an area where they admit data is difficult to access at local level (and there maybe overlap with sheltered accommodation). There is also the issue that market housing with wheel chair access may be bought by people who do not need it (or not presently) and so it may be that the need for improved access for wheel chairs needs to be a feature on more of the new housing.

3.13 The report finally considers two other specialist areas. In the case of students it concludes there is adequate provision for any anticipated growth and in terms of self build it suggests there is some appetite. It does not quantify how much may be required but

includes a figure of 1,110 expressions of interest with the various local authorities. As self build houses are most likely to come forward as windfall this may be relevant where local authorities are assuming no or little windfall provision.

4. Market Signals

4.1 In terms of market signals the HEDNA considers these on a local authority basis and concludes that an upwards adjustment is required in all authorities as set out below:

A 5% adjustment in Charnwood is justified recognising that whilst house prices in the Borough are similar to the HMA average, overall and relative to incomes, rental affordability is better and stronger comparative household growth is already envisaged in the demographic-led projections (34.2% 2011-36 compared to 26.3%) across the HMA). The lower relative adjustment thus reflects the combination of the market signals analysis, and the higher relative housing growth which is envisaged in the Borough, in a context where Charnwood does not have the very young and ethnically diverse population that Leicester City has;

A 10% adjustment is justified in Leicester, Hinckley and Bosworth, and North West Leicestershire on the basis that while there is a clear case for adjustments to improve affordable housing delivery, the market signals evidence presents these areas as being the more affordable parts of the HMA;

A 15% adjustment is justified in Harborough and Melton on the basis that there is both a clear case for adjustments to improve affordable housing delivery and the market signals evidence presents these areas as being the more expensive parts of the HMA;

A 20% adjustment is justified in Oadby and Wigston and Blaby on the basis that a number of the market signals point to pressures (such as high land values in Blaby and high rental and lower quartile housing costs relative to incomes in Oadby and Wigston) but in particular a need for a higher upward adjustment to the demographically driven OAN with the aim of increasing affordable housing delivery.

4.2 While the adjustments are higher in more affluent areas where house prices are generally less affordable, upward adjustments are being made in all areas, even where market signals, as opposed to the provision of affordable housing, would tend to suggest an adjustment isn't needed.

4.3 In particular, the test for an adjustment to 'Market Signals' in the National Planning Policy Guidance of Housing Need (Paragraph: 019 Reference ID: 2a-019-20140306) is whether: *'Prices or rents rising faster than the national/local average may well indicate particular market undersupply relative to demand.'* Yet large adjustments are being made in areas where prices are higher (for example, Harborough) but the increase in prices is well below the national/local average.

4.4 There is understandable concern about the use of such upwards adjustments from CPRE and others and whether they will in reality deliver greater affordability, but there is also a question mark about whether, in a housing market considered to be reasonably self-contained, an upwards adjustment in one authority should not reflect negatively elsewhere, allowing the whole to balance out. A blanket approach to all authorities seems to undermine the purpose of the adjustment.

5. DCLG OAN Consultation

5.1 Since the publication of the HEDNA DCLG has published its long awaited consultation on simplifying the calculation of OAN, 'Planning for the right homes in the right place'. It suggests a simplified approach to calculating OAN based on the SNPP figures for housing growth with a simplified formula for market signals of:

$$\text{Adjustment factor} = \frac{\text{Local affordability ratio} - 4}{4} \times 0.25$$

5.2 For local authorities this would be capped at 40% above the current plan figure or for those without an up to date plan 40% of demographic need or their current plan figure.

5.3 The consultation includes a calculation of this for 2016-2026 (annualised) and the table below shows the figures for each Leicestershire local authority against the various outputs of the HEDNA. The difference in end date creates difficulties with comparisons and there is a question mark over whether the new OAN would include vacancies, but it suggests that the new simplified approach might not reduce the overall OAN, only Leicester, Blaby and North West Leicestershire coming out lower.

5.4 CPRE will respond in detail nationally to this consultation but the concern expressed in relation to the blanket additional of houses (whatever the market signals) expressed about the HEDNA would still apply.

Local Authority	OAN in HEDNA 2011-2036	Demographic Trend HEDNA 2011-2036	SNPP in HEDNA 2011-2036	Economic HEDNA 2011-2036	Consultation Approach 2016-2026	Consultation LA Reference 2016-2026
Leicester	1668	1516	1504	993	1626*	1230-1330
Blaby	361	301	278	300	345	370
Charnwood	994	947	950	735	1045	994
Harborough	514	447	402	423	542	532
Hinkley and Bosworth	454	413	377	414	469	454
Melton	170	134	156	170	207	195-245
North West Leicestershire	448	378	304	448	360	270-330
Oadby and Wigston	155	129	110	126	133	148
Total	4716	4265	4081	3608	4727	4193-4403
Adding Vacancies at 3.6% to Consultation figure					4897 (* not confirmed with local authority)	

6. Comparison with SHMA 2014

6.1 While I have not examined the GL Hearn SHMA housing assessment of 2014 for Leicestershire in detail, which considered the OAN then, it is worth noting its conclusions on numbers. It produced a range. The lower end it explains is the demographic need (assessed on the existing projections) and the higher figure takes account of market figures and affordability. The economic need is also identified as 3687 houses. While the demographic figures (in the HEDNA) have increased since then, (and will be influenced by changes in assumptions about migration and other factors,) it is notable that the underlying economic need does not seem to have significantly altered, indeed it has gone down in as much as it has changed.

Conclusions regarding Overall Housing Need

	Housing Need to 2031		Housing Need to 2036	
	Lower	Upper	Lower	Upper
Leicester	1250	1350	1230	1330
Blaby	360	420	340	400
Charnwood	810	820	770	780
Harborough	415	475	400	460
Hinckley & Bosworth	375	450	350	420
Melton	200	250	195	245
NW Leicestershire	285	350	270	330
Oadby & Wigston	80	100	75	95
Leicester & Leicestershire Total	3,775	4,215	3,630	4,060

7. Reactions to HEDNA figures

7.1 As part of the SPG process the Local Authorities in Leicestershire have produced a 'Joint Statement of Co-operation Relating to Objectively Assessed Need for Housing'. This agrees that each local authority will take account of the HEDNA figure and will include in its local plan a trigger mechanism for adjusting housing numbers which would allow for a partial review if the Strategic Growth Plan required additional housing.

7.2 The Joint Statement includes a table which sets the OAN against theoretical capacity, although the Statement which suggests there is a 'theoretical' capacity of 206,908, almost double the OAN and that only Leicester and Oadby and Wigston could not meet their own need, with something like 15,000 homes needing to be exported from Leicester. The reference to 'theoretical' capacity should be treated with caution as it may simply represent sites put forward by developers.

7.3 Since then Melton has done its own report on the impact of the HEDNA housing numbers, North West Leicestershire has submitted evidence to its Public Examination favouring a higher OAN (then reduced to the HEDNA OAN) and Harborough has submitted its plan on the basis of a higher figure than in the HEDNA.

Local Authority	Response	Housing per Annum	Addition to HEDNA OAN	Justification	Largest Sites
Melton	Report by GL Hearn to Support Local Plan	230-274	44-88	Support Growth Deliver Roads Boost Supply Redistribute from elsewhere in Leicestershire	Melton North 1500 Melton South 1700
North West Leicestershire	Public Examination Document	520 dpa (now reduced to 481)	39 (Now 0)	Boost Supply Flexibility Redistribute from elsewhere in Leicestershire	North of Ashby de la Zouch 2050
Harborough	Local Plan Submission Sept 2017	640 (including 15% supply over provision)	25 (for Magna Park) 83 (over provision) 108	Provide Housing to Support Magna Park Allow for flexibility and sites not being delivered Redistribute from elsewhere in Leicestershire	Scraptoft 1200 Market Harborough 1100 Lutterworth 1500

8. North West Leicestershire

8.1 Exam 69 was produced for the Public Examination into the plan. It noted that the figure in the plan (540 dpa) is higher than the 481 figure in the HEDNA (350 in the 2014 SHMA). Overall this amounts to 780 dwellings over the period of the plan.

8.2 The justification was set out on three grounds:

1. *Having an over provision is consistent with the National Planning Policy Frameworks aim of 'boosting significantly the supply of housing land';*
2. *Such an over provision will provide a degree of flexibility which will ensure that the OAN will be met as a minimum and will also deal with any unforeseen circumstances (for example if a site does not come forward at the rate predicted or if new household forecasts are published);*
3. *In the event that there were a need to redistribute some development from elsewhere within the LLHMA, and if as a consequence it were agreed that some of the redistribution should go to North West Leicestershire, then the over provision provides headroom which may mean that an early review of the plan is not required.*

8.3 In terms of point 1 it is worth noting that the HEDNA figure is some way above the SNPP, the trend figures and even the economic need figures.

8.4 In terms of point 2 it is hard to answer in detail without examining how the council is approaching its supply of sites and also what attitude it is taking to windfalls but it does seem to raise the question of to the extent to which councils should deliberately over-allocate land.

8.5 In terms of point 3 there may be some merit in this if other authorities are under-providing, but at this stage this is a matter which has not been agreed within the Strategic Growth Plan and CPRE may want reassurances that this over-supply will actually be compensated elsewhere.

8.6 The report considered the supply of affordable housing to be adequate and referenced the mix of housing in the HEDNA while not including its own specific policy wording.

8.7 Since then, however, North West Leicestershire have reduced their overall need in line with the HEDNA although they have actually increased allocations (partly to compensate for assumed poor delivery in Coalville and blight by HS2). They are also not making any allowance for small windfall delivery, although they acknowledge in their modified plan (Para 7.5) that windfalls, both large and small have been an important source of supply. They have also committed to a review to meet identified unmet need in the future.

8.8 The NW Leicestershire Plan Inspector reported back in October 2017 and accepted in broad terms the approach to the HEDNA resisting suggestions from development interests that the numbers should be higher.

9. Melton

9.1 GL Hearn have undertaken a detailled report for Melton in support of their local plan. This seeks to justify a position of 230-274 dwellings per annum, which is considerably higher than the 186 in the OAN in the HEDNA and even higher than the trends analysis. There are four reasons given for this.

1. *Positively supporting sustainable growth in the Borough's economy and aligning with the evidence in the Employment Land Study. The evidence indicates that between 230 – 274 dwellings per annum might be needed to support this.*
2. *Delivering the Melton Mowbray Transport Strategy, including the eastern, northern and southern distributor roads, which will positively support town centre regeneration, address congestion and rat running, deliver new employment sites and support economic investment;*
3. *Boost significantly the supply of housing, with positive impacts in terms of both improving overall housing affordability and meeting the need for affordable homes in the Borough. 280 dwellings per annum would be needed to meet the affordable housing need in full at 25% affordable housing delivery;*
4. *Making a positive contribution to meeting the potential unmet needs arising from other local authorities within the Housing Market Area.*

9.2 In terms of 1 it is explained that the HEDNA shows a greater need for housing to support economic growth in Melton than elsewhere but I cannot see where it explains why the modest increase in the HEDNA should be replaced by the much larger increase in this report.

9.3 The key paragraph appears to be 3.43 where the Melton report suggests that because the housing need to meet planned growth is lower than the demographic need additional dwellings will be required to raise participation rates. I struggle with this argument, firstly because the Oxford model assumes migration will follow jobs so in the planned growth one might expect lower housing need and secondly because the OAN in the HEDNA is already above the planned growth figure.

9.4 There is also consideration of previous work by Experian for the 2014 SHMA using a different model which increases the share of economic activity in Melton. I understand there are differences in the way the Experian Model works (in particular in relation to migration effects). Without detailled explanation it is hard to square the two and there must be concerns about how consistently the share of housing need to meet economic growth will be treated if each plan adopts variations on the HEDNA approach in this way, especially if they all justify additional housing.

9.5 In terms of 2 a range of concerns about the Melton Eastern Distributor have been suggested to me by the Burton and Dalby Parish Council. I have not examined those Distributor Roads in detail but past evidence (including the recent CPRE commissioned report 'The Impacts of Road Projects in England' which examined Post Operational evidence from Highways England) would make me sceptical of claims that new road building would reduce congestion and not simply generate additional traffic.

9.6 It does concern me more widely that housing should be justified not on a needs basis but to deliver road building and this is something CPRE may want to challenge in more detail in this case. The symbiotic nature of the bypass and the housing may also cause some concerns.

9.7 In terms of 3 the aspiration to deliver affordable housing is admirable. This report does not however consider the background to this in the way the HEDNA does and the conclusion the HEDNA draws that an OAN should seek to contribute to meeting affordable housing needs but does not need to meet them in full.

9.8 Lastly in terms of 4 it is assumed that any housing above the 154 trend based need could contribute through the duty to co-operate to under provision elsewhere. In saying this, as with North West Leicestershire there appears to be a pre-empting of the policy choices in the Strategic Growth Plan. Moreover, if the OAN is set at 184 at least some of that housing would not be counted to meet that under-provision.

10. Harborough

10.1 The Harborough Local Plan was submitted in September 2017. It starts from the basis of the 532 dwellings per annum (dpa) figure (for 2031) in HEDNA and then adds a further 25 dpa based on a study of need to support development at Magna Park. A further 15% addition is made to allow for development that might not come forward and to contribute to undersupply in other parts of the HMA, (in effect Leicester and Oadby and Wigston which say they cannot meet their own need.) The total is 640 dpa in the submitted plan.

10.2 In reaching this number a succession of stages have been undertaken, each of which increase overall housing need. The concern will be that these may be overlapping and optimistic. The following areas are worth noting.

i. The HEDNA OAN figure is considerably higher than the need, either economic or demographic. The tailing off of housing need evident in the 2036 work suggests that those might be better seen as ceilings.

ii. The OAN includes 15% added to the trend figure, which is already the highest of the three fundamental indicators of need. This increase is justified in the HEDNA on the basis that there is a case for adjustments to improve affordable housing delivery and the market signals evidence presents these areas as being the more expensive parts of the HMA.

In terms of affordable housing it is accepted that such an increase will not meet affordable needs and that other mechanisms will be required to deliver sufficient increase in affordable housing.

In terms of the cost of housing Harborough is more expensive than other parts of Leicestershire and that is unlikely to change but the test in the National Planning Policy Guidance of Housing Need (Paragraph: 019 Reference ID: 2a-019-20140306) is whether: *'Prices or rents rising faster*

than the national/local average may well indicate particular market undersupply relative to demand.' It is a relative rather than an absolute test.

Table 31 from the HEDNA (below) shows that Harborough has seen price rise below both the National and Local average.

Table 32: Benchmarking Median House Price Inflation in HMA (2000Q1 to 2015Q1)

	5 Year Change	10 Year Change	15 Year Change
Leicester	15%	13%	189%
Blaby	13%	18%	147%
Charnwood	17%	25%	192%
Harborough	1%	18%	144%
Hinckley & Bosworth	18%	30%	190%
Melton	0%	21%	126%
NWL	14%	19%	160%
Oadby & Wigston	8%	16%	143%
East Midlands	14%	16%	154%
England and Wales	8%	30%	158%
HMA Average	10%	20%	158%

Source: GLH Analysis: Land registry Price Paid Data

iii. The addition for Magna Park is based, as far as I can tell on an assessment of housing need specifically for that site and amounts to 500 homes over the 20 year plan period. The intention is these will be close to Magna Park. The nearest settlement (in Leicestershire) is Lutterworth and the plan includes 1500 houses in Lutterworth, three times that required for Magna Park. In other words, I can see no clear reason to believe that the Magna Park requirement cannot be met within the existing provision (or even a lower provision at Lutterworth). Since the overall OAN for Harborough is considerably higher than the predicted economic need one would assume that this matter could be considered as a matter of redistribution of housing need.

iv. The further 15% addition for delivery failure and to meet unmet need further adds to the level of theoretical housing need. These are two separate aspects and it should be clear which may need addressing. Given the large amount of leeway already exercised it seems to me that delivery failure can be deemed to be accounted for.

If this addition is to meet unmet need elsewhere it is important that this need is firmly identified and allowed for in other plans. It would seem more appropriate at this stage to adopt the position of North West Leicestershire and review the plan when that need is clear.

10.3 In other words an OAN of 463 for Harborough based on the 2031 trends assumptions would seem more than adequate to meet the genuine demographic and economic needs of Harborough. There is no clear reason for a market signals uplift or for additional housing to meet the need at Magna Park, which is amply provided for already.

11. Conclusion on Housing Need

11.1 The demographic need is driven by two key components, the changing profile of the population and migration. Clearly the later is the more volatile, especially given the current political and economic impacts of Brexit. However, it should be noted that Brexit is only likely to create downward pressures on migration as reflected in the recent ONS 2016 national population projections. This may make the earlier SHMA estimates of need more realistic.

11.2 Beyond the demographic predictions, the trend based analysis relies on past trends giving a clear representation of future action. Given that the economic analysis suggests lower household need than the demographic predictions, there must be at least some question about this approach.

11.3 The addition, beyond both SNPP and trend predictions, of adjustments for market signals raises more questions. It appears to be being undertaken whether or not the relevant authority has market signals which are worrying either in absolute or relative terms. This results in housing being added across the board. There does not appear to be any compensating mechanism between the local authorities in how the market signal adjustment is dealt with.

11.4 The increase in market housing to resolve the need for affordable housing also concerns me, not only because it is clear that there is no scenario in which enough affordable housing could be built on the back of market housing but because this has been exhaustively dealt with elsewhere and I cannot see why this approach is required by the NPPF or NPPG.

11.5 The economic need (even with planned investment) has remained static over both the SHMA and HEDNA and is considerably lower than the demographic need. Because the Oxford Model does not fix the population but allows for migration to be influenced by economic factors. It seems to me that this should act as a counter-weight to the market factors arguments in that it suggests the SNPP figures would provide the necessary housing to address the needs of Leicestershire.

11.6 The responses to the HEDNA so far seem to add to the risk of housing number inflation in that they further exceed all the identified figures, even those using the Government's recent consultation approach. The assumption that these will be compensated for elsewhere through the duty to cooperate is not established. The arguments about growth are likely to be expressed elsewhere. In the case of Melton a driving factor appears to be the construction of a bypass.

11.7 There is clearly also a risk that these high levels of allocation in outlying authorities would fuel green field development and undermine brown field development across the county.

11.8 According to letters from to Harborough Council, which are included in Harborough's Duty to Cooperate assessment, published as part of the local plan process, Leicester's housing figures, along with a small amount from Oadby and Wigston, creates a theoretical undersupply which is fueling calls for extra housing elsewhere.

11.9 In the case of Oadby and Wigston the shortfall to 2031 is only 161 homes.

11.10 In the case of Leicester quoting the 2031 figure they estimate consistent delivery of 1,100 homes per annum would produce 22,000 homes, a shortfall of 11,840 and they say their SHLAA provides for 25,006 homes, a shortfall of 8,834. However, this is based on the accepted OAN. If one considers the SNPP figures (particularly if one questions the assumed market uplift required for Leicester in the HEDNA) the SHLAA produces a much lower shortfall of 5,534 or 276 homes per annum and there is no short-fall on the economic figures.

11.11 Although it would require an examination of supply side issues, including relevant SHLAAs and the approach to such issues as windfall allowances to consider this in more detail, it appears, however, that any shortfall may be open to question.

12. Employment Land

12.1 In terms of office space the majority developed in the Functional Economic Market Area (FEMA) around Leicester with Charnwood and Blaby following, and significant development in North West Leicestershire. This is also reflected in the space available, although Charnwood seems to have less. The majority of available space seems to be in medium and larger units and there is a limited amount of Grade A development.

12.2 The agent's perspective is that the office market is tight particularly around Leicester and this is not helped by the use of key sites for logistics provision.

12.3 In terms of employment space there has been a contraction in office space since 2000 for most of the authorities, although North West Leicestershire has seen expansion. Much of this has been the reuse of existing sites, and there is a strong market for large warehousing sites (both on existing and new sites), fuelled in particular by the geographical location of the country giving the maximum nationwide access for logistics purposes.

12.4 The agent's perspective is that there is a need for large sites (50,000 sq m+) and the particular demand is within the Golden Triangle (geographically between the M1, M6 and M69 motorways expanding to include the M42 which defines the wider triangle) where there is a strong desire for logistics development.

12.5 The HEDNA report identifies the following locational elements as key:

1. *High accessibility, with sites near to the strategic road network, in particular motorways and key junctions as well as proximity to rail freight facilities. There is a general preference for locations that are equidistant between the goods production and their destination. This is the main reason that the Golden Triangle, and the Midlands in general, is such a popular destination for distribution companies. Good links decrease the transport costs and allow large freight amounts (full loaded tracks) to reach their market in optimal times.*
2. *Plot size and specifications vary based on the nature of the company. However there are some general characteristics that make the site much more efficient and consequently profitable for the logistic companies. There is demand for big units with high ceilings in order to take advantage of the new technology and digitalisation in the production/operation process. In addition there is demand for ancillary space associated to the distribution uses that can add extra value to the products for example final customisation, call-centres and even occasionally production. Large yards that enable easy loading/unloading, circulation and temporary storage of HGVs are also sought after.*
3. *Logistics companies also benefit from locating near each other than if they were in an isolated location. In particular clustering provides access to specialised workforce; allows exchange of knowledge and services; encourages co-operation that can consequently reduce supply chain costs; encourages innovation derived from the synergies among the cluster's occupiers and usually has well-maintained infrastructure on the site.*
4. *Adequate supply of suitable workforce is also an important factor in the choice of location. The requirements are changing while technology is evolving and higher skilled labour is more than ever occupied in the logistics' sector.*

12.6 The HEDNA report concludes that there is a strong market for logistics sites in the medium term.

12.7 The report then seeks to assess the overall need for B1, B2 and B8 space. Importantly the HEDNA does not assess either the supply or (as importantly) the quality of existing industrial land. This means it is not able to fully assess the need to replace sites, whether existing sites should be released for other uses and what potential there is for improving sites to make them marketable if they are currently not readily available. In terms of attracting real investors these quantitative elements are clearly of the greatest importance.

12.8 To assess the office space the report uses jobs forecasts but for 'other manufacturing' but for 'logistics uses' it suggests there is a weak relationship with jobs, partly as a result of a reduction in the need for employment in manufacturing.

12.9 The logistics forecasts use the MDS Transmodal Strategic Distribution Study (Nov 2014). The assumptions that uses are not something I have considered, although I

understand it is a demand led model which may open up the question as to whether such a level of demand is desirable even if it is achievable.

12.10 Based on a jobs forecast model for the planned growth scenario the HEDNA concludes there is a need for a substantial amount of B1 a/b development (office) but a loss of B1c and B2 (r and d and manufacturing). Even allowing a 5 year margin based on current development the need for B1c and B2 is negative.

Table 79: Forecast Gross Land Requirements in Labour Demand Model with Margin (Hectares) – B1 and B2 Uses

	2011-31		2011-36	
	B1a/b	B1c/B2	B1a/b	B1c/B2
Leicester	6.3	-13.20	6.8	-19.70
Blaby	45.2	6.10	47.7	5.20
Charnwood	37.3	7.73	40.0	6.23
Harborough	21.3	1.31	23.7	0.11
H&B	31.9	3.09	34.2	-0.11
Melton	9.5	5.47	10.1	5.57
NWL	45.5	-8.38	50.3	-10.98
O&W	1.2	-14.80	1.6	-15.80
FEMA	198.3	-12.7	214.5	-29.5

Source: GL Hearn, 2016

12.11 However, in reality there will be demand for new sites so they also assess the need based on past completions which creates a new and substantial requirement. While this approach may have some virtue it does create a circular argument in that completions in the past will have created attractive locations which at the same time other areas (particularly where there are urban brown field sites) may have languished. It may be that an alternative policy of improving such urban sites could have been successful for many of the industrial needs, albeit there are likely to be limitations when it comes to the very largest sites. Again, this is difficult to fully assess without considering individual authority's supply side information.

Table 80: Projected Need for Employment Land based on past Completions (Ha)

	2011-31		2011-36	
	B1a/b	B1c/B2	B1a/b	B1c/B2
Leicester	2.1	36.0	2.6	45.0
Blaby	37.4	14.8	46.8	18.5
Charnwood	13.8	20.5	17.2	25.6
Harborough	13.7	22.4	17.1	28.0
H&B	10.7	13.6	13.3	17.0
Melton	18.1	21.1	22.6	26.3
NWL	44.7	3.3	55.9	4.1
O&W	1.4	0.0	1.7	0.0
FEMA	141.8	131.7	177.3	164.6

Source: GL Hearn and Local Authority Data, 2016

12.12 The report goes on to estimate the need for larger B8 warehousing sites based on the MDS report, along with smaller distribution sites, again based on completions.

Table 81: Gross Need for Strategic Distribution Land in Leicestershire

Year	to 2031	to 2036
Replacement build ('000 s q m)	1,260	1,643
Growth Build ('000 s q m)	185	244
Total ('000 sq m)	1,445	1,886
Land required (ha)	361	472

Source: MDS Transmodal, 2016

Table 82: Smaller Distribution Need

	Average Sq m	2011-31	2011-36	Average Ha	2011-31	2011-36
Leicester	3,044	60,872	76,090	0.8	15.2	19.0
Blaby	1,987	39,749	49,687	0.5	9.9	12.4
Charnwood	2,111	42,220	52,775	0.5	10.6	13.2
Harborough	1,505	30,102	37,628	0.4	7.5	9.4
H&B	3,167	63,343	79,178	0.8	15.8	19.8
Melton	2,740	54,794	68,493	0.7	13.7	17.1
NWL	3,354	67,071	83,839	0.8	16.8	21.0
O&W	761	15,212	19,015	0.2	3.8	4.8
FEMA	18,668	373,364	466,705	4.7	93	117

Source: GL Hearn and Local Authority Data, 2016

12.13 The final figures are then set out.

Table 83: Employment Land Needs (Ha)

	2011-2031			2011-2036		
	B1a/b	B1c/B2	Small B8	B1a/b	B1c/B2	Small B8
Leicester	2-6	36	15	3-7	45	19
Blaby	37-45	15	10	47-48	19	12
Charnwood	14-37	21	11	17-40	26	13
Harborough	14-21	22	8	17-24	28	9
H&B	11-32	14	16	13-34	17	20
Melton	10-18	21	14	10-23	26	17
NWL	45-46	3	17	50-56	4	21
O&W	1	0	4	2	0	5
FEMA	**142-198**	**132**	**93**	**177-215**	**165**	**117**

Source: GL Hearn, 2016

12.14 The ranges in the table for B1 a/b seem to be between completions and labour demand modelling.

12.15 It is also suggested this actual need may be higher in Leicester if assumptions about density are relaxed to allow more car parking. CPRE may have a specific view on whether such a relaxation is desirable given the need to reduce workplace car travel demand, particularly where there are public transport alternatives.

13. Conclusions On Industrial Land

13.1 The approach to B1c and B2 land may be something CPRE wants to challenge but it would be assisted by a more detailled analysis of the overall market including whether options for the reuse of land could be increased to reduce land take. A negative need for

new B1c and B2 land certainly seems counter intuitive (as well as overly mechanistic) but equally relying on past trends may mask other factors.

13.2 I find it hard to see any good reason for treating the 165 hectares in these categories as a minimum rather than a maximum.

13.3 A similar position applies to the 117 hectares for small B8. I note the reference to commercially attractive locations and clearly there is a need to ensure sites are attractive. However, there may also be options for making existing sites attractive, particularly if the factors hindering development are very local or site specific, such as land contamination or site access.

13.4 As regards larger B8 the figure of 472 hectares (equivalent to 4-8 sites of 50-100 hectares) is a purely demand led figure and clearly needs to be tempered with the environmental, transport and countryside impacts of large warehousing. CPRE has been critical of such large logistics sites which are as big as small villages and are often very intrusive, using high bay warehousing units with significant lighting requirements, usually in countryside locations. CPRE will also be likely to have a view on whether existing sites should expand before new sites are used (subject, of course, to local constraints).

13.5 To interrogate the larger B8 figure further would require an examination of the MDS study. It needs to also be considered in the light of the B8 requirement in the West Midlands which will almost certainly be competing for the same strategic market. From a market perspective, both regions are likely to serve the same customers. As an example of this potential double-counting the proposed logistics site at Four Ashes in Staffordshire, which is going through the National Infrastructure process accounts for 270 hectares, only 100 hectares of which is being included against need in the Black Country (according to the recent Black Country Core Strategy Options Consultation).

13.6 Lastly CPRE may want to consider further the interaction of housing and employment land.

13.7 There are two issues on this front.

13.8 The first is highlighted in the report, in that the distribution of large new industrial sites, particularly B8, may influence housing demand patterns.

13.9 The second is that if there is a contraction of need for B1c/B2, but new sites come forward of higher quality, poorer quality industrial land might well become available to meet housing need. Indeed that might be the best use for some industrial land which is poorly located. Again this is a key issue for any supply side analysis.