



The countryside charity
Leicestershire

Charity Number: 1164985

Blaby: New Local Plan Options Consultation 2021

CPRE Leicestershire Response

March 2021

1. Introduction

1.1 This document sets out CPRE Leicestershire's sets response to the Blaby New Local Plan Options: Options for Spatial Strategy, Sites and Strategic Policies consultation.

1.2 This consultation takes place against a background of increasing pressure for action to combat the impact of climate change, including a national policy commitment to Net Zero emissions by 2050.

1.3 Equally, partly as a result of the Covid-19 pandemic and the lockdowns, there has been growing public recognition of the value and benefits provided by countryside, nature and green spaces as well as of the vulnerability of the natural environment.

1.4 Increasingly, planning, development and transport policies need to respond to these concerns. Questions about the scale, location and choice of sites for new development, which are the central questions for this consultation, cannot be adequately considered in absence of a strong focus on this wider context.

1.5 Viewed through the prism of this consultation, we believe that the overall weight given to the climate change, biodiversity, environment and the countryside is too weak and needs strengthening.

1.6 CPRE Leicestershire has concerns about this consultation process, the direction of travel of the emerging Plan and about the issues that are at the centre of this consultation. Our response will in turn discuss the emerging Strategic Objectives; the level of growth required; locational strategy issues; sustainable transport; and finally, matters relating to 'other strategic issues'.

2. Key Points

- Strategic Objectives should highlight Climate Change and achieving Net Zero carbon as plan priorities,
- The Plan should cater for Blaby's own housing need (346dpa) and not accept additional housing from Leicester at this time,
- Blaby should only meet its own employment needs,
- There is no case for release of strategic employment sites,
- Principle of Settlement Hierarchy supported with reservations,
- Principle of development in PUA, extended PUA and medium villages accepted,
- Whetstone Pastures and Stoney Stanton Strategic Sites not supported as they will be car dependent communities in open countryside,
- Plans for Sustainable Transport based on bus services to replace car travel is unattainable given proposed policies,
- Lessons from strategic developments demonstrate the difficulty of achieving sustainable transport options,
- Important planning role of Green Wedges supported,
- Protection and enhancement of biodiversity should be a priority,
- Inclusion of plans Green Infrastructure policies welcomed,
- Serious concern over weakness of response to climate change issues, especially regarding transport.

3. Emerging Strategic Objectives (*Question 1*)

3.1 The consultation document presents a long 'check list' of objectives organised around the three elements of sustainability – social, environmental and economic. CPRE has a number of observations about the list, together with some suggested amendments to the wording.

3.2 From the way the list is set out it is difficult to gain a sense of what is the Council's vision for the future of Blaby and what it sees as its planning priorities. It is not clear that all 15 objectives are equally weighted and, if not, how they have been weighted. Equally, it is difficult to see how the different objectives are linked together and how they relate more specifically to each other and especially, how they will be prioritised when they come into conflict.

3.3 CPRE Leicestershire believes that the Local Plan has to give priority to addressing climate change. The Plan needs to focus on combatting climate change and achieving Net Zero emissions by 2050 in meeting growth and development aspirations.

3.4 In this context, the most important strategic objective is SO4 which supports the move to a low carbon future. This should frame and guide all other objectives. This needs to be supported by SO1, SO2 & SO7 which direct growth to the most sustainable locations which could achieve more active travel and make the most efficient use of land including maximising the use of previously developed land.

3.5 SO14 is supported in so far as it seeks to prioritise the use of sustainable modes of transport and to promote an efficient transport network and reduce congestion. However, it is also unclear what an 'efficient' transport network means and how much this relies on and how much this will prioritise those modes as oppose to providing additional road capacity.

3.6 Moreover, the last sentence: 'To plan strategically for transport and seek improvements to local, regional and national transport networks' is vague and suggests there could be an over emphasis on schemes to support expensive new road transport infrastructure projects, and too little on the measures that could tackle local transport and reduce car use and congestion.

3.7 Despite emphasizing the importance of SO4, we feel this objective should be strengthened. The wording should read: 'To support the moves to a low carbon future and to contribute to achieving net zero carbon emissions by embedding actions on climate change in the Local Plan.' It is 'actions' rather than just 'consideration' that is needed now.

3.8 In addition, an objective should be added to SO4 that requires all new developments to demonstrate how specifically they will contribute to achieving zero carbon emissions both in

the development process and in the final product. Equally, an objective to use the design of developments to minimise energy use and carbon emissions should also be added.

3.9 Strategic Objective 8 also needs amending to indicate that valued countryside and landscapes should be protected. In CPRE's view, protection and enhancement of the environment, including important countryside, landscapes and the natural environment, should be an objective of the Local Plan. The objective should be amended with the insertion of the words 'countryside and valued landscapes' after 'District's most valued natural assets'.

3.10 In answer to Question 1, CPRE feels that the presentation and wording of many of the objectives needs improvement and some cases, especially SO4 and SO8, also needs strengthening. The requirement to address climate change and to work to achieve net zero carbon commitment should be emphasised more.

4. Level of Housing Growth Required

4.1 The housing numbers, including the distribution of Leicester's unmet need and the Government's proposals for the 'Standard Methodology' for calculating housing need are clearly among the authority's concerns with regard to this consultation. It is surprising, therefore, that respondent's views are not requested on the situation and an approach outlined in Para 4.1.1 to 4.1.10, although we accept this may simply be a drafting oversight.

4.2 CPRE Leicestershire has considered the Local Plan alongside the most recent Strategic Housing and Economic Land Availability Assessment from 2019 (SHELAA) and the Residential Land Availability Document (RLAD 2019-2020) which contains the latest five-year land supply statement.

Standard Methodology

4.3 The Government's Standard Methodology calculation for housing need in Blaby is 346 dwelling per annum (dpa) based on the 2019 Affordability Rates and 2014 Office for National Statistics (ONS) housing projections¹. The figure for the 2018 Affordability Ratio is 339 which the council claim is the figure they have used up to this point. Based on the up-to-date figure, the need from 2019-2038 (19 years) would be 6574 homes.

4.4 If one uses the 2016ONS figures (422 dpa) this rises to 8018 and the 2018ONS figures (532 dpa based on a 40% local plan cap) it rises to 10108. It is not Government Policy to use these figures and the December 16 Statement on Planning² reiterates that the 2014ONS figures should form the basis for Local Plans. Moreover, when the plan refers to the 2018 figures it does not refer to the cap or to the much greater impact the 2018ONS figures would have on Leicester which we refer to below and which would, even with the 35% uplift leave Leicester with a surplus of supply.

4.5 It seems to CPRE that the 2014ONS figures is the correct figure at this time, and should only be considered for adjustment if Leicester was (as compensation) also adjusting its figure downwards in line with the 2016ONS and 2018 figures.

4.6 CPRE would also caution against adopting the 2018ONS figures because of the issue of the short data span used to calculate Internal Migration resulting from changes in NHS data collection. This allows local figures to be influenced by recent high completions in an area, which

¹ Unfortunately, the Plan refers to these as 2020 which is the published not actual date and the 2018 figures as 2019. This should be amended as it is confusing when comparing this plan to other plans.

² [Government response to the local housing need proposals in "Changes to the current planning system" - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/changes-to-the-current-planning-system)

would correspond with the high level of recent completions in Blaby which have consistently exceeded the Plan Requirement as set out in Table 2 of the RLAD. Notably the 2018ONS variant, which adjusts for this problem, results in a significantly lower base figure as shown in Figure 1 of the Plan suggesting this is a genuine issue in Blaby.

4.7 There is then no reason to adopt a higher figure than the 6574 identified by the Standard Methodology, excluding issues relating to housing need in Leicester. Nor is there any reason to increase supply to meet the Five-Year Land Supply as can be clearly seen from the RLAD report on current supply.

Leicester Overspill

4.8 The justification given in the consultation (Para 4.1.2) for an increase in housing above the Standard Methodology level is entirely based on the declared overspill from Leicester. According to the Leicester Plan, this amounts to 7742 homes, a figure derived from the Standard Methodology calculation of 29,104 and a supply of 21,362.

4.9 In responding to the recent Leicester Local Plan consultation, CPRE commented on those figures. Our comments are reproduced as Appendix 1. In particular, we argue that the yield from both strategic sites and non-strategic sites, as well as from windfalls, should be increased. In the case of windfalls, a small site figure of 200 as opposed to 150 is justified as well as some further allowance for larger windfalls.

4.10 If one adopts the 2016ONS figure the total housing need to 2019-2036 reduces to 19,159 (1127 dpa), and 2018ONS 13,719, (807 dpa). In both cases there is no overspill, even without accounting for the additional supply we consider is likely to come forward.

4.11 This, however, has been complicated because the Government has, in its 16 December Planning Statement, required the largest 20 cities to increase housing by 35% above the final total. While this could be seen as arbitrary, it is clearly intended to correct the proposed New Standard Methodology 'algorithm' issues, which led to unacceptable patterns of development.

4.12 The uplift was also specifically intended to ensure housing need was met in those areas not in surrounding, more rural locations which would include parts of Blaby.

4.13 The statement is explicit in this regard saying:

The increase in the number of homes to be delivered is expected to be met by the cities and urban centres themselves, rather than the surrounding areas. In considering how need is met in the first instance, brownfield and other under-utilised urban sites should be prioritised to promote the most efficient use of land.

4.14 It goes on to explain that the current mechanism for delivering housing in adjacent areas is to be abolished:

Local planning authorities should co-operate on that basis, notwithstanding any longer-term proposals set out in the Planning for the Future White Paper which explain that we intend to abolish the Duty to Cooperate.

4.15 In the case of Leicester, the need would increase by 35% to 39,290 across the plan period using 2014ONS, a rise of 10,186, which presumably would be unmet need unless the supply figures were adjusted. In the case of 2016ONS it would rise to 25,865 and 18,521 for 2018ONS. So, the 2018ONS figures would still not lead to an overspill but the 2016 figures would have a small overspill of 4503.

4.16 However, it is problematic to rely on these figures, as is done in Para 4.1.2 of the Blaby Plan, because it is quite simply unclear as yet how the Government intends to practically deliver the aspirations in its statement.

4.17 The Government considers there are strong sustainability and climate change reasons for concentrating more housing in urban areas. The statement also emphasises the availability of services.

4.18 Furthermore, and importantly, the Government considers that new capacity for house building will come forward in those cities. As the statement says:

...there is potentially a profound structural change working through the retail and commercial sector, and we should expect more opportunities for creative use of land in urban areas to emerge. Utilising this land allows us to give priority to the development of brownfield land, and thereby protect our green spaces.

4.19 Unfortunately, as it stands there is no clear mechanism for addressing this aspiration within the local plan system since much of any such change would come via windfall (sometimes large windfall) sites. That is a matter which Government has yet to address.

4.20 As it stands, then, CPRE consider it is not appropriate for Blaby to accept additional housing from Leicester. It may be that a review of the plan is the appropriate occasion to consider the issue when the Government's practical thinking is clearer.

4.21 Another way to look at this is to refer to the Strategic Growth Plan which assumes there will be a shortfall post 2031 in Leicester and that Leicester's unmet need should be shared by other Leicestershire authorities after that. In the case of Blaby, it suggested a need of 370 dpa from 2019 to 2031 or 361 from 2019 to 2036, and a need from 2031 to 2050 of 924, made up of 36 for Blaby itself and 563 as overspill from Leicester. All these figures were based on the 2016 HEDNA not the Standard Methodology.

4.22 CPRE Leicestershire was heavily critical of some of the assumptions at the time³. For example, the extension of need at the same trajectory from 2031-2050 as between 2019-2036 made no sense given that all the ONS projections show housing growth declining. And, of course, as Para 4.2.3 of the Consultation Plan points out (in a different context), the HEDNA itself is now somewhat out of date.

4.23 Moreover, the SGP figures are actually based on assumptions about supply not need. So, the 924 figure is based on the delivery anticipated on sites, not yet designated, not on any clear justification of need. Essentially this is a circular argument, the number results from sites being allocated which then leads to those sites being allocated.

4.24 Be that as it may, the Blaby Plan refers to an average of 555 dwelling per annum from the SGP work, although its derivation is unclear. We do not believe that figure should be adopted. Instead, the Council should rely on its own need for 346 dwellings as per the Standard Methodology.

4.25 Not least, for the practical reason that the HEDNA did not have access to the most up to date ONS figures (they were using 2014) which cast doubt on whether the housing need will ever materialize from Leicester to the degree anticipated and because, if it does the Government anticipates it being met in Leicester, although as yet the mechanism for that is unclear.

4.26 It is also worth referring to the current investigation by the Statistics Authority into problems with ONS figures in relation to housing, particularly exaggeration of housing growth because they are skewed by higher-levels of students and migrant workers. While we have not considered this in detail in relation to Leicester, it would seem reasonable that the high student population in Leicester might lead to similar issues thereby casting further doubt on such high levels of housing growth in the city.

Supply

4.27 In terms of supply the data is largely provided in the SHELAA. The main site list does not identify whether land is greenfield or previously developed. It would be helpful if this was improved, although relatively few sites are previously developed accounting for 143 houses on Previously Developed Land (PDL) which are considered 'reasonable' and 1540 on land with some PDL element.

4.28 According to the SHELAA the council have used estimates of the developable area for each site based on figures agreed with stakeholders at development panels and then applied densities

³ <https://www.cpreleicestershire.org.uk/wp-content/uploads/sites/41/2020/11/sgp-consultation-response-cpre-leicestershire-submission-send.pdf>

of 30 dwellings per hectare (dph) in more rural areas and 40dph on sites adjoining the Principal Urban Area unless more detailed site information is available. It is hard, therefore, to be sure how accurate these figures are. However, they suggest an excess of land which is being proposed for development, that is to say 29,888 dwellings, far in excess of the overall need under any scenario.

4.29 There is no windfall completions data given that can be identified in the SHELAA but the small sites commitment rate from 2001-2019 (given in the RLAD) amounts to 789 or an average of 56 dpa. This suggests there is a potential for a windfall contingent beyond 2026 not identified in the supply side figures. Even just allowing for windfalls on small sites this could add 672 dwellings.

4.30 Moreover, one would expect the '*profound structural change working through the retail and commercial sectors*', anticipated in the Government's December 16th Statement, to also impact on some of Blaby's own existing commercial sites creating an increase in windfalls, some potentially substantial.

Conclusions on Housing Need

4.31 In CPRE's view, pending further clarification from the Government in relation to the 16 December 2020 Planning Statement, the future of the Duty to Cooperate and testing of the Leicester overspill figure, Blaby should adopt a housing need figure of 346 dpa or 6574 from 2019-2038. In addition, this requirement should then be reduced by at least 672 dwellings to give a modest windfall allowance, as this would fulfil the 'compelling evidence' requirements of Para 70 of the National Planning Policy Framework (NPPF). This would then leave a requirement of 5902 dwellings or 311 per annum.

5. Employment Land Requirement (*Question 2*)

Level of Need

5.1 The level of required Employment Land which Blaby is pursuing remains open and there is still no clear policy in this latest consultation. This reflects, correctly in our view, the lack of up-to-date information.

5.2 Notably, as is said in Para 4.2.3 of the consultation strategy the HEDNA is now somewhat out of date and, in particular, does not reflect the likely structural impacts of either BREXIT or COVID.

5.3 Moreover, as we pointed out in our comments on the SGP (See appendix 2) there are particular internal issues with the HEDNA evidence in relation to large scale Logistics Provision.

5.4 This is firstly because we believe it misrepresented the evidence of the 2017 MDS study, itself out of date, and secondly because it, simply, did not take into account logistics proposals which were being taken forwards through the National Infrastructure process, such as the M69 Jn2 proposals, which are outside the local plan process but provide competing capacity for logistics depots. That led to the need for logistics sites being heavily exaggerated.

5.5 The plan refers to a 'Warehousing and Logistics in Leicester and Leicestershire' study which 'is expected shortly'. That may provide robust evidence going forwards, but if it replicates the issues with the HEDNA and MDS studies it could lead to similar unjustified conclusions.

5.6 Moreover, large sites of the size envisaged, for example, at Jn2 of the M69, serve a regional function. Consideration needs to be given, therefore, for other competing provision in the East (and probably also West) Midlands, before allocations are made.

5.7 Further comments at this stage on logistics need would, therefore, be premature.

5.8 Para 4.2.6 of the strategy not only suggests there may be unmet logistics need (which is not defined), but also unmet need from the City of Leicester itself.

5.9 We cannot find any clear indication from the Leicester Plan that there is unmet need in Leicester and, as is said in Para 4.14 of the Leicester Plan, the evidence on land for business is also out-of-date.

5.10 Even if some unmet need were theoretically identified, it is more than likely, in CPRE's view, that there will be structural changes to land use post-COVID in the city. That being the case, we consider Blaby should not at this stage be considering any additional employment land beyond its own need.

5.11 Those local needs are identified in Para 4.2.6 of the strategy as 3 hectares per annum or 57 hectares over the lifetime of the plan, but again this is derived from the out-of-date HEDNA.

5.12 The employment sites considered in the SHELAA are given at the end of Appendix A of the Strategy, (Page 65). Unhelpfully that table does not include the hectares for each site. This should be remedied in future iteration of the plan so the figures can be compared with Para 4.2.6.

5.13 The total in hectares of 'reasonable sites' is 293.57 hectares. But this excludes EKUM001, 'land at Blood's Hill South'. According to the SHELAA that Site (identified there as Land at Ratby Lane) is now allocated for residential development in the Local Plan Delivery DPD 2019. The DPD says it could provide 52 houses but gives no size. The anomaly of nomenclature and size should also be corrected in any future plan.

5.14 Of the identified land, 222.67 (ELM001) is the land north of Junction 2 of the M69 which is being proposed as a rail freight interchange under the National Infrastructure process (although their scoping information gives the land as amounting to up to 185.43ha out of 335.7 ha⁴) It would again be helpful if the table in the Appendix made clear that this is not an allocation in the plan.

5.15 A further 44.41 hectares is on land west of Junction 2 (EAST001) and 26.49 hectare is on other sites, excluding EKUM001.

5.16 It is likely, therefore, that the need to release further employment land in the District is at least partly dependent on the release of the NIC proposals north of Jn 2 of the M69 which would far exceed any local need.

5.17 Even excluding that site, it would appear there is likely to be excess of land for business needs. We do not consider in this response the merits of the various proposed sites but would expect sustainability criteria to play a major role in choosing specific sites.

Conclusions on Employment Need

5.18 In CPRE's view, there is not clear evidence of additional need in Blaby for employment land to meet either Leicester City's need or a need for large-scale Logistics provision.

⁴ i.10 (ii) of the Scoping Report on Hinckley Proposal, [BIR_PROP2\5649927\1 \(planninginspectorate.gov.uk\)](#)

5.19 The evidence on local need is out-of-date and more up-to-date evidence will need to be provided so a robust case for a level of need can be established.

5.20 This is likely to be lower than the 3hpa identified in the HEDNA due to the impact of structural changes since that report was completed, including the impact of COVID.

6. Locational Strategy Issues (Questions 3 to 7)

6.1 Regardless of the level of housing and employment growth that will be required, CPRE agrees it is important that the locational strategy is based upon clear rational and deliverable criteria that promote an environmentally sustainable pattern of development consistent with achieving Net Zero emissions by 2050 or earlier.

6.2 However, CPRE has concerns over aspects of the emerging Locational Strategy and the processes for identifying and assessing different options for suitable and sustainable sites for development. In particular, we have concerns over what we perceive as an emphasis on the larger strategic sites as a preferred way forward.

6.3 These concerns are reinforced by statements such as that in Para 4.4.1 where it states that 'this approach broadly reflects the agreed Strategic Growth Plan for Leicester and Leicestershire'. We have been and remain sharply critical of both the SGP and the HEDNA that supported it, especially its proposals for a development of a growth corridor for housing and employment along the route of what was the proposed A46 Expressway road running east and south of Leicester. Moreover, the evidence supporting it, as set out above, is now out of date.

6.4 These criticisms, among others, of the SGP relate to the lack of proposals for sustainable transport and the car dependent character of these proposed settlements, the cumulative loss of attractive countryside and a failure to address climate change. These could apply equally to the Strategic Site options listed in Para 4.3.11.

6.5 In CPRE's view, despite some references in the consultation document to reducing car dependent development and promoting active and sustainable transport options, not enough weight is being given to the transport dimensions in determining whether particular sites or development strategies promote environmentally sustainable development. In particular, we would have liked to have seen stronger criteria about the contribution of bus transport in assessing particular options for development.

6.6 Local Plans routinely point to the need for improved and sustainable public transport and promise proposals for specific bus links or services. In practice, the aspirations for better and more sustainable public transport solutions fail to materialise. From experience, we are not optimistic that any of the major suggested strategic sites will be sustainable or Net Zero as far as transport is concerned.

Settlement Hierarchy (Question 3)

6.7 The Settlement Audit and Hierarchy report provides an assessment of the sustainability capacity of existing settlements and is in principle supported. It is also used to decide which sites are considered reasonable and which sites should be rejected. It appears that over 70 sites are considered reasonable. Nine are also rejected on the basis of being detached or isolated.

6.8 What is questionable is the methodology used to decide which sites are reasonable given the need to move to a low carbon future and reduce car use. The first strategic objective SO1 is to direct new growth to the most sustainable locations and there is also a significant emphasis on being able to have easy access to various facilities by walking and cycling. The difficulty of providing good access to a wide range of facilities is greatly underestimated and, therefore, many sites which are considered reasonable should be rejected.

6.9 The methodology uses a point scoring system to rank settlements. The highest ranking is given to settlements which have access to some specific services as this is considered to minimise the need to travel. A lower ranking is given to the ability to access services and employment in other areas by public transport, essentially bus. This is mainly based on the frequency of the bus service rather than whether most people would consider it a genuine choice.

6.10 The methodology means that settlements can score over 40 points if they have some of the facilities identified but only up to a maximum of 5 points if they have what is considered to be good public transport access. The perceived quality of public transport therefore has little influence on the ranking of settlements. Settlements can, therefore, be considered to be reasonable even if in practice it is evident that a car would be the preferred choice of transport for most people.

6.11 In response to question 3, we support the principle of a settlement hierarchy but have concerns about how it is being applied in identifying and deciding which sites are candidates for development.

Locational Strategy Options (Questions 4 and 5)

6.12 Various different options for distributing and locating new housing across Blaby are put forward in the consultation document for comment. Together the options adopted will constitute a Locational Strategy that sets out where new development should go. How much and where will be determined ultimately by housing requirement numbers.

6.13 Looking at the options, CPRE is supportive in principle of some of the options but others are of concern. Appropriate sustainable development in the Principal Urban Area (PUA) makes sense and should be supported. In addition, any opportunities for windfall developments should also be promoted as set out above. Sites in the PUA and urban core are more likely in the long term to provide sustainable and less car dependent development as other active and sustainable transport initiatives develop.

6.14 We share concerns about the creeping growth of smaller settlements especially those in the countryside distant from the urban core. We would not want to see significant developments in these settlements. However, we would be open to small genuinely affordable housing developments dedicated to providing housing for local people on Rural Exception sites, subject to site specific issues.

6.15 Although we are likely to have reservations about particular sites, there does appear to be some scope for sites in the extended Principal Urban Area to provide for the required housing, taking into account the lower housing requirement we suggest. Sites chosen would need to be well integrated with existing communities and have, or be capable of developing, good connections in terms of walking and cycling as well as access to good bus services. The likelihood of them becoming a car dependent development should be a critical factor.

6.16 In terms of priorities in the Locational Strategy, it is CPRE's view that sites in the extended PUA should be considered in advance and allocated for development in preference to early allocation of the suggested major strategic sites at Whetstone Pastures and Land West of Stoney Stanton.

6.17 CPRE has concerns in connection with all four of the suggested strategic sites mentioned in paragraph 4.3.11 but especially those at Whetstone Pastures and on Land West of Stoney Stanton. Given that Blaby should adopt, as we have argued above, a housing need figure of 346 dpa or 6574 for the plan period 2019 to 2038, any allocation of the two major strategic sites at this time would be inappropriate and premature.

6.18 All four sites will in different ways and to varying degrees impact adversely on open countryside. The Blaby and Elmesthorpe sites have a closer geographical relationship with urban areas than the other two.

6.19 Whetstone Pastures is in countryside to the south of Countesthorpe and would swamp the village of Willoughby Waterleys. In effect, this proposal would create a new community in what is currently open countryside. The village of Stoney Stanton would face a massive increase in size from a development in open countryside adjacent to the existing village. Such development would fundamentally change the character of these two areas of the Blaby and Leicestershire.

6.20 In CPRE's view development on such a scale raises fundamental questions. Para 4.3.11 paints a picture of 'well-located, well-designed and well-connected sustainable Strategic Sites'. It is implied that this scale of development will result in a wide range of local services as part of the development. While it is possible for more services to be provided than on smaller but significantly sized developments, neither of these two are large enough to become self-sufficient communities providing the majority of services. Nor are the majority of residents going to find their employment within these communities.

6.21 This means that there would be travel movements in and out of the development on a regular basis, so the available mode of transport becomes an important consideration. We are fear that both Whetstone Pastures and Stoney Stanton would end up as yet another car dependent development.

6.22 In connection with this emerging Local Plan, there are yet again optimistic noises about provision of active and sustainable modes of transport as alternatives to car use. We are profoundly sceptical that anything will really change as a result of measures likely to be contained within this emerging Local Plan. In this regard, the progress of the Lubbesthorpe development does not inspire us with confidence.

6.23 The importance of public transport was touched on in the Interim Sustainability Appraisal. Appendix C runs through the various spatial options. A recurring theme is that it is important to ensure that growth is located in areas that meet the needs of the local population and support sustainable modes of travel, partly to reduce carbon emissions.

6.24 This is expanded in Chapter 11 of the Appraisal: Accessibility. In 11.1.42 it says that regardless of the strategy there is a need to ensure that development is supported by public transport improvements and the enhancement of local transport networks.

6.25 Despite this statement, the transport criteria used in the site appraisal methodology framework (Appendix D) and in site appraisal proformas for each site (Appendix E) appear rather limited.

6.26 In Appendix D, the criteria appear to be very arbitrary. One is the number of jobs within various distances by road regardless of the type of job while another accessibility criterion is proximity to a bus stop, regardless of bus frequency or whether any buses would be useful to reach some facility/destination.

6.27 In Appendix E, there are the site appraisal proformas for each Residential, Employment and Mixed-Use site. For Residential sites, there are 3 relating to transport: Access to Public Transport; Commuting distance; Access to convenience store. For Employment sites, Access to Public Transport is included. However, the brief comments relate to proximity to a bus stop and frequency, without any consideration of usefulness of the service.

6.28 The comments made for each site show how simplistic this methodology is and how inappropriate it is with regard to assessing whether or not a site is sustainable with regard to transport.

6.29 In response to Question 4 on whether the locational strategy should include strategic sites where there are higher levels of growth, CPRE's view is that it should not include them. As indicated above and will be argued in the next section, the planning system is really unable to deliver major developments that are not largely car dependent and will have difficulty contributing to the national commitment to net zero carbon by 2050.

6.30 All we will end up with is even larger car dependent developments on more greenfield sites in the countryside.

6.31 In response to Question 5, relating to the use of smaller and medium sites located across the settlement hierarchy, with some caveats, CPRE's view is that a range of smaller and medium sized sites should be used. Most of these should be in the PUA, the extended PUA and Medium sized Villages.

6.32 We have no observations to make on questions 6 and 7.

7. Sustainable Transport and Development

7.1 Linking transport and development and delivering sustainable transport is of critical importance. If developments are to become genuinely sustainable with real alternative options to the use of the car, lessons need to be learnt from experiences in Leicestershire and elsewhere. As background to answering questions 28 and 29 in particular, we touch on those experiences.

Lessons from Lubbethorpe

7.2 The Lubbethorpe development is regarded as an example of a development which will have good access by public transport and by walking and cycling. Unfortunately, no information is provided to show that this development is achieving its aim of reducing the number of car journeys and encouraging more walking and cycling.

7.3 The adjacent area of Leicester Forest East has the dubious distinction of having the highest car ownership in Leicestershire. 2011 Census data shows 75% of households in this area owned at least 2 cars and 5% owned 4 or more. Areas with the highest car ownership are typically associated with newer developments: Elmtree Avenue in Glenfield has 4% of households with 4 or more cars and only 7% without a car.

7.4 Census data also shows that while a significant proportion of work journeys go to Leicester, relatively few of them go to the city centre. At Lubbethorpe there has only been a requirement to provide a bus service to one stop the city centre, with a suggestion that it would run non-stop.

7.5 The Section 106 agreement appears to only require the approval of a Strategy setting out the details of some public transport services. This refers to a 20-minute frequency or better bus service for 2 hours in the morning peak and 90 minutes in the evening peak. There appears to be an intention that this provision would be commercially viable. The frequency and hours/days of bus operation outside the peaks are not specified in the 106 Agreement.

7.6 It is difficult to see how this sort of service provision would persuade people to reduce their car use significantly.

7.7 The housing area at Lubbethorpe has a low density of around 25 dwellings per hectare. This is not conducive to the operation of an efficient or attractive public transport system. The cost of implementing the transport strategy has a limit of £2 million so there is no guarantee of service provision in the longer term if the service cannot be run commercially.

7.8 So far it has not even been possible to provide the proposed regular bus service to Lubbethorpe and it currently only has a demand responsive service to an area in the southwest of the city, which includes the City Centre, the LRI and the universities.

7.9 The pedestrian and cycle strategy requires a very limited number of 3 metres wide footway/cycleways to be provided and appears to permit at least 1000 dwellings to be constructed before they are required.

7.10 The Transport Assessment included an ambitious goal for a maximum of 60% of work journeys (50% driver, 10% passenger) to be made by car with 15% by bus. Census data from the 2011 Census showed 83% (77% driver, 5% passenger) of the journeys to work from the adjacent LFE area were by car with only 5% by bus.

Lessons from other developments

7.11 Almost all new developments have not been designed to facilitate bus penetration or operation. Over the last few decades new developments have been getting more and more car-dependent with fewer facilities included within them. Furthermore, the location of facilities has become more dispersed. There has also been significant contraction of bus services particularly during evenings and at weekends.

7.12 In general, this has meant that public transport use has been very low. Within Blaby, only the settlements that lie immediately adjacent to Leicester have some significant, but still very low, use of buses. Narborough has some rail use but it is effectively negligible.

7.13 Over the last few years, a number of developments have been promoted as 'garden communities'. Recent studies of these developments have shown that they are highly car-dependent. This is because they invariably have unattractive public transport and little to assist the use of walking or cycling. Many have also been built next to major roads that facilitate car use. Furthermore, other road schemes have often been part of the proposal.

Lessons for the Local Plan

7.14 Most of the sites that have been identified as being reasonable are likely to be highly car-dependent even if they are located very close to the Leicester PUA. While the availability of some facilities will reduce the need to travel, this is unlikely to be very significant.

7.15 Furthermore, the prospect of any significant improvement to bus services to provide an attractive alternative to the car is extremely remote as the likelihood is that they will continue to contract if current Government policies do not change significantly. Other countries have demonstrated many advantages of adopting an alternative approach to planning and transport.

7.16 While larger sites could offer a much wider range of facilities and could contribute towards the provision of an attractive bus service the experience so far is that this has not been achieved. It will be interesting to observe how Lubbethorpe achieves the stated desire to reduce car journeys.

7.17 It is evident that major sites, like the ones put forward at Whetstone or Stoney Stanton, would be highly car dependent. Both seek to gain direct access to the motorway network, and both would add traffic to Junction 21 and to many other roads in the surrounding area.

7.18 It is also evident that under current policies it is impossible to make developments acceptable. One way forward would be for planning authorities to impose far more stringent requirements in planning approvals and ensure that these are tied to some measurable targets with no limit on the funds or other measures needed to ensure these are achieved.

7.19 The other option is that the Government changes the planning system to fully integrate it with transport provision. This would require a move away from infrastructure for roads towards support for public transport provision and its long-term operation and with a significant role for effective walking and cycling measures.

7.20 The recent proposed changes to NPPF are perhaps a hint that the Government realises that the current NPPF has not been effective. In February the Secretary of State for Transport said he wants 50% of journeys in towns and cities to be made by walking and cycling by 2030. To achieve this, the Government is going to have to make some very substantial changes to the planning system and to transport.

7.21 It is important to remember that major developments can take up to a decade to approve and two more decades to achieve. That would take some beyond 2050 by which time we must be at zero carbon.

Response to Question 28 (Transport Infrastructure)

What do you think about the proposed policy approach to transport issues?

7.22 The emerging policies seem to rely on an increase in highway capacity and new roads which would increase the level of traffic overall and not reduce congestion, although no specific detail is given. There are many mentions of reducing the use of cars and increasing walking and cycling but this would be undermined if the plan ends up relying on building additional roads and increase highway capacity to access development sites.

7.23 Unfortunately, the current public transport system does not cater for everyday needs even in the most densely developed parts of the District. Under current policies there is no prospect that the more scattered parts of the District would have anything more than a

token bus service or a safe cycle network. This means that any development in those areas would be likely to be highly car-dependent. As such, those areas are considered to be unsuitable for additional development.

Response to Question 29 (Transport Infrastructure)

Are there any specific transport issues that the Local Plan should address?

7.24 Transport is a major producer of carbon and harmful pollutants. It is a legal requirement that the Plan must include policies designed to secure that the development and use of land in Blaby District contribute to the mitigation of, and adaptation to, climate change.

7.25 There is little sign that the Plan recognises this obligation. It is seeking to support developments in places that will be highly car-dependent in conjunction with other policies that would seek to allow seemingly unrestrained growth and are likely to depend on the construction and improvement of roads to facilitate more vehicular traffic.

7.26 Road construction generates a significant amount of carbon, as does the manufacture and use of vehicles. Carbon emitted in the early years will make it more difficult to meet the net zero obligation later on. The Plan must include adequate monitoring to demonstrate whether it is on course to achieve net zero by 2050 and show how it would adapt if necessary.

7.27 The 4th March Public Accounts Committee Report, Achieving Net Zero,⁵ rightly raises the issue that public attitudes will need to change and that it is not simply a matter of switching to electric cars and carrying on as we have done.

7.28 The overall strategy should put developments in places where good alternatives to the car can be successfully delivered. This includes both housing developments, and other locations that attract cars. It is envisaged that more people will work at home and/or reduce their travel. It is recognised that there are currently many issues which make impossible to create an attractive public transport network but development locations and layouts must not ignore this option.

7.29 This has been compounded by putting developments in places without much consideration as to whether they facilitate public transport operation and use or actually provide and guarantee the level of services that would be needed to reduce car use. Cycling and walking can provide an excellent and healthy alternative to the car if more facilities are provided locally. Far too much land is used wastefully by providing so much space for roads and parking. A higher density development also facilitates the operation of public transport.

⁵ <https://committees.parliament.uk/publications/4921/documents/49419/default/>

Response to Question 30 (Infrastructure, services and facilities to support growth)

What do you think about the proposed policy approach to provision of infrastructure and services and facilities to support growth?

7.30 For the reasons outlined in answer to Q29 it is not considered that the proposed approach to the provision of infrastructure and facilities to support growth of the type envisaged is acceptable. There is an urgent need to reconsider this approach to meet our Climate obligations.

7.31 It is vital that the Strategic Growth Plan, with its vision of car-dependent developments linked to major roads, is rejected immediately. Other plans for large scale developments around the country, usually linked to expensive infrastructure projects, have shown many problems with that approach. These include funding, land assembly, viability and uncertain delivery. The Plan must ensure that essential infrastructure like water, drainage, fast internet is provided.

Question 31 (Infrastructure, services and facilities to support growth)

Are there any specific infrastructure issues that the local plan should address?

7.32 The Plan must ensure that excellent, safe and attractive walking and cycling networks, suitable for all, are designed into all developments and connected up to a wider network including links to the countryside. This should lead the direction of the Plan towards a sustainable, zero Carbon future.

8. Other Strategic Issues

Strategic Greenfield Designations (pages 29-30 – no question)

8.1 These designations have had a positive planning impact and will become more important as more areas are built on. For many they will provide nearby green space as well as fulfilling planning functions. In particular, the absence of Green Belt designations in Leicestershire enhances the importance of other designations around and into the urban area. CPRE is a strong supporter of these, and specifically green wedges.

8.2 Any loss of green wedge following a review should be replaced by compensating areas of new green wedge.

Urban Design Quality and Place Making (Question 8)

8.3 Good urban design is essential and has been absent in too many recent developments. Blaby's emphasis on good design and good place making is to be welcomed. But it is not enough to have policies, guides or good design codes and SPDs.

8.4 These need to be backed with the resources of trained or specialist staff to make good design a major feature of the planning system and consideration of proposed developments in Blaby.

Mitigating and adapting to climate change (Question 9)

8.5 There is some potential for useful measures here with regard to renewable energy /low carbon technology, the use of sustainable materials and construction, design and layout of sites, minimise flood risk, green infrastructure and we would like to see specific policies, targets and measures to achieve these in the Local Plan.

8.6 There must be targets and a requirement for developments to show specifically how they are achieving these.

8.7 However, we see conflicts between achieving these and locational strategies. Until transport and planning are more fully integrated and there is much less emphasis on car dependent greenfield development, the impact of these measures is likely to be useful but limited.

Flood Risk (Question 10)

8.8 Up to date data on flood risk is essential but policy on managing flood risk must be that no development will be permitted in flood-prone areas and all developments must not increase runoff rates. The policy has to be enforced and applied in the development management processes. At present the policy approach appears rather weak and undeveloped.

Biodiversity and Geodiversity (Question 11)

8.9 Biodiversity and geodiversity are essential components of a sustainable future. We agree with the elements set out for biodiversity and geodiversity and that development needs to be more sensitive to these needs and that the best and most versatile agricultural land is protected. But the policy approach does not go far enough.

8.10 We are in the midst of an ecological and biodiversity emergency with the loss of habitats and extinction of species. Leicestershire has seen a significant loss of habitats and species over the last 50 years. Therefore, enhancing biodiversity and reversing this decline should be a key policy objective.

8.11 However, the overall approach appears to be much more about maintaining and protecting existing features, such as protecting and enhancing national and local priority habitats and species, rather than reversing their decline.

8.12 A recognition of the nature corridors and planning to protect and enhance them also needs to be in the biodiversity study 'that identifies and assesses the quantity and quality of biodiversity assets within the District'.

8.13 Unless very carefully controlled, development will continue to threaten elements of the natural environment. The idea of Biodiversity Gain could be a positive step forward in the planning system in arresting the loss of habitats and species. But that depends on how the idea is interpreted and applied.

8.14 We have concerns about the way in which off-site compensation might be applied. For example, compensating for the loss of mature trees in one development by planting new trees elsewhere is unlikely to be a biodiversity gain. We would like to see a strong reference to applying principles of biodiversity gain in policy.

8.15 As it is a relatively new concept, more specific guidance as to how it may be implemented in the form of a Supplementary Planning Document on Biodiversity Net Gain would be useful.

Heritage Assets (Question 12)

8.16 It is important that heritage assets are identified and safeguarded.

Environmental Quality Issues (Question 13)

8.17 Environmental quality is an essential part of a sustainable future and in good place making. The proposal appears reasonable but the real test is how the different issues are handled in the precise policies embedded in the Local Plan.

Healthy Communities (Questions 14 and 15)

8.18 It is encouraging that healthy communities, with references to physical activity such as walking and cycling, are now being seen more in terms of physical and mental wellbeing than just narrower health concerns. The pandemic and the lockdowns resulted in a greater recognition of the importance of the countryside and nature to our wellbeing.

8.19 The planning system needs to ensure we have access to countryside from urban areas and developments by means of footpaths, cycleways through green wedges or other designated green areas. Clearly there are links between policies under this heading and those for Green Infrastructure and Local Green Spaces.

Green Infrastructure (Question 16)

8.20 We welcome the inclusion of a focus on green infrastructure in this consultation and agree that a strategic policy on green infrastructure is required. We believe it is a critical element that contributes to good quality design. We would want the policy to stress its role in protecting and enhancing biodiversity as well as that to addressing climate change and achieving net zero targets. Green infrastructure requirements should be a crucial component in the design, layout and delivery of new developments as well about how they are situated and incorporated into the wider landscape. What we have here so far is just a skeleton of an approach, but look to it being developed into specific policy requirements.

Open space, sport and recreation (Question 17)

Local Green Spaces (Question 18)

8.21 The proposals are reasonable and we have nothing to add.

Affordable Housing (Question 19)

Mix of Housing (Question 20)

Older Person and Specialist Housing (Question 21)

Accommodation for Gypsies and Travellers (Question 22)

8.22 While we would not disagree with the broad statements of the policy approaches set out, we note that much in terms of the development of specific policies awaits the outcome of various reviews, most notably an update of the Housing and Economic Needs

Assessment, Local Plan Viability Assessment (for affordable housing), and Blaby Local Housing Needs Assessment (for Older Person and Specialist Housing).

8.23 We would expect the plan to produce strong policies and targets for the delivery of affordable housing. The current approach nationally has failed to provide really affordable housing options in the quantity and places where it is most needed. The provision of affordable housing, including in rural communities, is a major issue for CPRE, both in Leicestershire and nationally. Locally, CPRE has been particularly concerned about the provision of older person and specialist housing and about how it will be provided as part of the mix of larger developments.

Employment (Questions 23, 24, 25)

8.24 It is difficult to comment further when so much is surrounded by uncertainty and subject to unpublished reviews such as the Strategic Warehousing and Logistics study or dependent of reviewing evidence that it is claims needs to be gathered and updated (See our comments above on Employment Land Requirements). We are surprised that there is no mention of the impact of Covid pandemic on employment patterns or locations.

Retailing, Leisure, and Town Centre Uses (Questions 26)

8.25 There is recognition of the changing nature of retailing and its impact on the high street and town centres. Reference is made studies to be undertaken to identify the floor space needed. We would suggest that a study of the potential long-term impact of Covid on both the town centres across the district and on the Fosse Park complex. While it is still very early to be coming to firm conclusions about the future state of retailing in Blaby district, we detect in the wording here that there is an element of complacency about what changes the future may bring. As previously stated, Government (See 16 Dec Planning Statement) is anticipating significant change we would urge the Council to undertake further work on the implications for the District.

Tourism (Question 27)

8.26 We have nothing to add as comment.

Transport, Local Services and Infrastructure Policies:

8.27 Questions 28, 29, 30, 31 are answered at the end of Section 7 above.

Appendix 1

LEICESTER PLAN

CPRE Leicestershire housing comments

December 2020

Housing:

Policy SL01: Location of Development

Need:

5.2 The seventeen-year need figure is set out as 29,104 based on 1,704 dpa using the current Standard Methodology (SM), based on 2019 affordability figures and the 2014 Office of National Statistics (ONS) projections for the next ten years. Our calculation is that the SM figure is 1734 and so 29,478 is the correct figure (which is also the figure given in the 2019 Local Needs Assessment).

5.3 The Council says it will review this based on the 2020 affordability figures at the next iteration of the Plan. While this is a minor discrepancy the housing need in Leicester goes down dramatically if one uses either the ONS 2016 or 2018 figures because of the different assumptions about Household Formation, and in the 2018 case, Internal UK Migration. The respective figures are 1127 and 807 dpa.

5.4 The New Standard Methodology (NSM) which the Government is consulting on would result in a figure based on the ONS2018 figures of 1120 dpa or 19040 over the plan period. At the same time housing need elsewhere in Leicestershire would dramatically rise. Whether or not the NSM will be adopted is as yet uncertain.

5.5 And while the 2016ONS figures may give a more realistic projection of actual household formation in Leicester, CPRE Leicestershire remains sceptical about the 2018 assumptions in relation to Internal UK Migration which are based on only 2 years of data and disperse more housing need into rural areas.

Supply:

5.6 It is hard to assess the supply side properly without an up-to-date SHELAA, as the latest 2017 SHELAA includes a large number of sites not in the current plan and the yield from those sites which are in the plan is very different to the yield in the 2017 plan. Taking the nine sites bought forwards together, the 2017 yield was 656 and the 2019 yield was 309. We understand a new SHELAA is being prepared and needs to be completed before the formal Reg 19. Consultation

5.7 Similarly, yields from strategic sites have also been reduced. At this stage CPRE is not in a position to explain these reductions and is seeking further elucidation. We are also not

convinced that they are consistent with the aspiration of Policy Ho05. There will be concern 5.8 that a failure to ensure sites deliver sufficient housing will lead to further housing being developed outside the city where it is less sustainable and more car-based.

5.9 On the other hand, there are a large number of additional sites in the Plan not in the 2017 SHELAA. All together the non-strategic sites account for 1552 dwellings, which is inconsistent with the figure of 1486 in Table 1 of the Plan. The explanation is given in Appendix 1, but a consistent figure needs to be established.

5.10 The table also includes an allowance for small windfalls of 150 dpa, but the Council has not published the windfalls since 2017. Noticeably, windfalls rose in 2016 and 2017 beyond the 10-year average to over 200 (3400 over the plan period), which may reflect a more realistic figure. Even taking the 2017 SHELAA figure, including gardens (as is now permitted) would give 159 dpa (2703 homes over the plan period). Appendix 1 includes the latest ten-year figure which averages 182, but noticeably the last five years have all been above 200. We therefore suggest a figure of 200 dpa is appropriate, amounting to 3400 dwellings.

5.11 There is also no calculation for larger windfalls, which one might expect in a dynamic city such as Leicester and there is no list of SHELAA sites which were considered and rejected. This might reveal a level of sites which are currently not available but may become available in the future.

5.12 The plan does include an allowance for the Central Development Area, which we welcome and which is based on Townscape Analysis and Design Guidance, but the source of this remains opaque to us. However, we would argue that given changes in office, retail and leisure requirements, which may be accelerated post-COVID-19, there may be further development land, both in the CDA and elsewhere which comes forwards and this should be further explored.

5.13 CPRE, therefore, objects to this policy, but acknowledges this is partly due to a lack of background data which may be corrected at the next stage of the Plan.

5.14 In particular the yield from small windfalls should be increased. On the other hand, CPRE is objecting to SL03 and SL04 which reduces supply on strategic sites by 934.

5.15 Based on the current methodology the following supply table would be correct. However, we believe further work is needed to refine the yield from strategic sites and non-strategic sites and review the capacity on larger windfall sites and in town centres and other current retail locations.

Adjusted Leicester Plan Table 1: Housing provision from 2019-36

	Component	Dwellings
A	Housing Need 2019-36 (Standard Method 2019)	29,478 (1,734 dwellings per annum)
	Commitments	
B.	Commitments major developments detailed permissions and outlines	9,827
D.	Saved previous Local Plan allocations	0
E.	Reserved matters applications with a resolution to grant subject to s106 agreements.	0
H.	Small sites allowance / windfalls based on past rate	3,400 (200 dpa based on past delivery rate)
J.	Allocations identified in the draft plan	1,552
K.	City centre capacity work	4,905
L.	Strategic sites	1,658 (with SL03/04 2,594)
N.	Total capacity within the city	21,362
O.	Remainder need to be accommodated within the HMA (A-N)	8,136 (with SL03/04 7,200)

5.16 Moreover, even accepting the current supply housing figures, the shortfall of 7742 in the plan would become a surplus of 2322 if the NSM was adopted as currently formulated by the Government in its consultation paper. While, that 'algorithm' is not something CPRE supports, we are concerned that Leicester could enshrine the current shortfall in its plan, while other surrounding authorities develop plans under the new methodology (because of the Internal Migration redistribution) which include the same housing, effectively doubling up.

5.17 This would add unnecessary to pressure to build housing in unsuitable greenfield locations. To address this later point, the Plan should acknowledge the proposed changes to the standard methodology and the updated ONS figures and commit to review the shortfall whenever Government publishes a definitive methodology going forwards.

5.18 If that happens before the next stage of the Plan that may become redundant but, in that case, anyway, the housing numbers would need to be revisited. This seems reasonable since the shortfall, as is clear from the Leicestershire Joint Statement on Housing will almost all occur post 2031.

5.19 In line with this the figures given in 4.10, 5.6-5.12 and 5.18 should be reviewed for the next iteration of the plan with a view of maximising sustainable urban capacity.

5.20 Para 5.13 refers to 15 years. It should be 17 years.

Policy Ho02: Unallocated Sites

5.21 We support the approach to unallocated 'windfall' sites in general, although 'small' should be defined in the policy, not just the text. We are concerned that the policy does not address larger windfall sites which may well come forward, particularly given anticipated changes to retail requirements in town centres. Whilst we accept that larger windfall sites may be subject to a choice of uses or a mixture of uses which are hard to anticipate, the policy should give support for larger windfall sites and identify criteria for their approval.

Policy Ho03: Mix of Housing

5.22 We generally support this policy. The need for housing to address specific needs is particularly important, however the impact on yield and housing need should be subject to review if specialized housing needs are met, for example, through Care Home provision.

Policy Ho04: Affordable Housing

5.23 We support the aspiration to provide affordable housing to meet the identified need in the HEDNA. However, we believe the figures should be represented as minima, e.g., a minimum of 30% affordable housing on Greenfield sites. In our view the need for affordable housing is the most pressing aspect of housing policy in the City and should seek stretching targets.

Policy Ho05: Housing Density

5.24 We support the aim for higher densities and the minimum figures are welcome although it is unclear from the text in 5.32 whether this is a requirement or aspiration.

5.25 It should be clear that the 30 dph minimum applies to both Greenfield and Brownfield sites and that departures from it will require strong justification. But we would go further and argue that a higher target on brownfield land of 35 dph is more appropriate.

5.26 As well as the CDA there is a case for even higher densities where there are good public transport links or public transport can be improved to support higher densities. Lastly, we believe the policy should include a requirement that in all cases developers demonstrate that they have sought to use the land efficiently, subject to environmental constraints. That would ensure that minimum densities are not seen as all that needs to be aspired to.

5.27 This later element could be partially achieved by adopting a version of the second two sentences in Para 5.31 into the policy itself.

Policy Ho08: Student Accommodation

5.28 The provision of Student Accommodation is clearly an important element of housing provision in a city with a strong University presence. Moreover, the provision of significant amounts of new Student Accommodation has an impact on the availability of housing to other Leicester residents as it frees up homes currently rented to students. We would suggest, therefore, that the Policy should include a review mechanism to allow for the additional supply that might be released in this way.

Appendix 2

From:

LEICESTER AND LEICESTERSHIRE STRATEGIC GROWTH PLAN

Consultation

Comments by CPRE Leicestershire

May 2018

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 MDS⁶ 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 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

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

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 website⁷ 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 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.

⁷ <https://infrastructure.planninginspectorate.gov.uk/projects/>

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.