

# Response to Local Plan Consultation

from the Low Carbon Planning and Housing Working Group  
(one of the groups which make up Climate Action Leicester and Leicestershire).



## Start point.

There are many things in this plan related to climate change and carbon reduction which we support, especially the excellent energy hierarchy in the climate change policies and the systematic inclusion of design to support walking and cycling in the quality design sections. We also recognise that balancing housing need, jobs and the climate is very challenging and that you are making a start with this Local plan. However, given how massively and negatively climate change is going to impact on every part of life in Leicester, from jobs, to food, health and safe housing, we feel that climate change, both reducing our contribution to it and countering its effects, needs to be systematically given far more weight.

## Draft climate policy.

When we first read this draft plan in February, we were struck by two things.

1. The absence of important climate policy, for example around land allocation for renewable energy, water reservoirs, freight hubs and tree planting.
2. That where there are potentially good climate policies, they are not worded as requirements, or strongly enough
3. The absence of many small climate related details which may seem unimportant, but add up to a way of approaching planning which actually recognises how imperative it is to reduce our carbon emissions and minimise the impacts which will come from climate change. In other words, treating climate change as the emergency which it is.

Therefore, since March Climate Action's Low carbon planning and housing working group has been working with Leicester Friends of the Earth to go through this Local Plan in detail, thinking about what it needs in terms of climate policy, and finding out what other cities are doing in their Local Plans. We thought it would be helpful to draft actual example policies for you of the sort we would like to see in this Local Plan, and the resulting document is attached here as part of our group response to the Local Plan consultation. Some of the policies are based on yours with changes, while others start from scratch or are based on what other cities are doing. As we make comments below, we will refer you to the draft policies which we have written, and which are attached.

## Climate change woven into the whole plan.

Our first and overall concern with the Local Plan as it currently stands is that climate change is treated throughout as a subject area rather than a fundamental requirement running through the whole plan. Instead, it needs to be factored into every part of the plan, because every decision we take and action we take has a climate impact.

- **This should start with the vision which should explicitly talk about the city being resilient to climate change and reducing its footprint. See our draft vision on page 3 of our policies.**
- **It means the climate change policies should be combined with the quality design policies so they cannot be side-lined, which as you can see we have done in our suggested policies**
- **It means almost every policy should refer to minimising carbon emissions and ensuring we develop in ways which reduce the impacts of climate change on the people of Leicester.**
- **And it is essential that the Local Plan includes a specific carbon emission reduction target of net zero by the end of this plan - so 2035. See Climate commitment policy, at the start of our suggested policies.**

We agree with you that "The Local Plan has an important role in helping the council to meet its legal requirement to comply with national and regional targets." 2.11. However, in the case of carbon targets, national and regional targets should be the bare minimum of what you need to achieve. As your Climate Emergency declaration demonstrates, you need to treat climate change

just as seriously and urgently as you have been the Corona pandemic. National targets are not sufficient to stop runaway climate change and we (both the people of Leicester and the world) depend on you to do far better and not wait for national government to catch up.

### **The Strategic Growth Plan (SGP).**

As the City Major says in his foreword, “the Strategic Growth Plan agreed with our partner district councils and the county council sits behind this draft Local Plan”. This shows up in many ways, not least the fact that 4 out of 5 of the strategic growth areas are around the edge of the city and very low housing density requirements. However, the SGP itself is completely unsustainable in relation to climate change. It is based on a commitment to tens of thousands of new homes sprawled across the countryside along a new road and supporting the road and air-based logistics industry. Both of these mean ever increasing carbon emissions as people and businesses in the new housing and the logistics industry are forced (in the case of the former) or facilitated (in the case of the logistics industry) into more and more use of cars, HGVs and aeroplanes. If it goes ahead in its current form the SGP will utterly fail to achieve its aim of “very low carbon dioxide emissions” para 4.5 – instead it will massively increase them.

The recent decision not to go ahead with the A46 expressway substantially undermines the SGP, and should lead to it being completely reviewed. We hope carbon emissions and climate change will be given the weight they should have been given when first developing the SGP, as we will all have to live with the resulting climate change if we don't address it – and tragically it will be far more devastating than the corona pandemic.

### **The Local Plan's Sustainability Assessment.**

We are concerned that the Sustainability Assessment of the Local Plan uses an inadequate framework with which to assess the sustainability of this Plan. Since the SA “assesses the likely social, environmental and economic impacts of the draft Local Plan” (page 3 of the SA), it is important that the criteria used in the assessment are comprehensive and allow the assessment to do a good quality assessment.

Looking at the criteria on pages 45-47 as it currently stands, only 6 of the assessment categories are clearly related to climate change – these are:

6. Biodiversity, explicitly mentions changes due to climate change and contains good questions for assessment.
9. Water is explicit about climate change and again has a good set of questions.
10. The same goes for the climate change category.
11. Land use. Although it is clearly about climate change, the link here is not made explicit, and should be. Green spaces have the potential to be developed with trees and ponds in order to reduce the impacts of climate change and therefore part of the assessment should be about the potential loss of this climate mitigation effect.
12. Transportation. This set of questions is excellent. It would be good to see more emphasis on not making people car dependant, especially given the sheer numbers of people in the city who cannot afford cars and our need to encourage people to move away from using them.
13. Waste. Again the questions here are good and comprehensive.

However, in our opinion most of the other criteria categories should have included one or more questions relating to climate change. We need the emergency which is climate change to run through all the policies rather than being separated out, and therefore there should be climate related questions to consider in pretty much all the sustainability assessment criteria. In our view the following 8 areas should be adjusted to ensure that climate change is given weight – after all, the impact it is going to have on us and the world in the next 100 years will dwarf that of the Covid Pandemic even though it is unfolding more slowly.

1. Housing. If this criteria is intended to assess that housing meets people needs, then the questions in it should ensure that part of the assessment is if the housing will be fit to live in as climate change impacts on Leicester.
2. Health. Climate change will have a substantial effect of people's health, both due to temperature and weather changing the spread of disease, and as it exacerbates pre-existing conditions (such as respiratory and anxiety related). There should therefore be a question within this category assessing if the policy reduces the cause of climate change (carbon footprints) and another about if the policy will reduce the impact climate change will have on people's health.

4. Safety and crime. Increased temperatures increase anger levels and associated crimes. As food becomes less reliably available, there will also be a related drop in people both being and feeling safe. So again, the capacity of the policies to reduce these impacts as climate change worsens should be assessed.

5. Diversity. It is clear that, just as with Covid, the communities who will suffer first and most from climate change are the ones who are already disadvantaged – and they are also generally the communities with the lowest carbon footprint and therefore the least responsibility for causing it. As part of this category, the capacity of the policy to reduce the impact of climate change on disadvantaged communities should be assessed.

7. Heritage. Since conserving and protecting heritage buildings will be harder as climatic conditions with high winds and flooding etc occur, it would be good to include a question about policies protecting buildings from this – and more importantly another about valuing historic environment more due to their capacity to reduce the impacts that the people of Leicester experience from climate change such as heatwaves and flooding.

8. Natural resources. The questions here are good but the second one “to reduce the adverse environmental effects of resource use” does not go far enough as the use of resources carries a massive carbon footprint for the city. A question about reducing resource use in order to reduce climate change/carbon footprints would be appropriate here.

14. Employment. This set of questions is missing a key point – as climate change kicks in many parts of our economy will shift and change to accommodate it, for example local food will become more important and freight will have to be moved more sustainably than by air and road. Additionally, the worse climate change is and the faster it kicks in, the more devastating it has the potential to be for our local economy. For long term economic resilience, policies should be looked at in the light of these changes. Questions are clearly needed about the capacity of policies to reduce carbon emissions, increase climate resilience and encourage growth in areas with will thrive through climate change such as renewable energy generation and deep green housing retrofitting.

15. Vitality/viability. The question about car use only looks at encouraging use of sustainable transport modes, but as the research shows in fact it is important to also actively discourage car use. Where the two are done together a much greater modal shift away from cars occurs. So this question should be rephrased: “reduce the use of the car by encouraging the use of sustainable transport and by actively discouraging car use”. At the moment the policies in the local plan often do well on this criteria because they are good at encouraging development which will support walking and cycling, but the local plan is pretty much devoid of policy asking for design to discourage car use and this is as or more important. Had this criteria included this question, the assessment in this category would not have been nearly so positive.

16. Education. For some reason the distance to school only measured distance to Primary schools. Given how many secondary school children are now driven to school, distance to secondary school should also be measured.

In spite of our concerns about the sustainability assessment framework, even as it stands, we entirely agree with some of the conclusions it draws – specifically that

1/. the Local Plan should “extend the requirements for affordable housing to smaller sites, and increase the requirements for larger sites” p59, Sustainability Assessment.

2/. That the Local Plan should require higher minimum housing densities both in the central development area and in the suburbs. As the SA shows on page 77, the current housing density policy Ho05 has nothing to recommend it. Every single category is either neutral, or unable to measure.

3/. That given strategic development sites 1,2,3 and 4 there needs to be substantial development of the public transport network in the North West of Leicester

4/. That the plan needs to increase its requirements relating to renewable energy generation.

## **Moving on to the draft Local Plan itself.**

### **Affordable Housing.**

Since the real need in Leicester is for affordable rental housing, and as developers systematically fail to build the affordable housing they are committed to, we want you to require a higher proportion of affordable housing than is actually needed in the hope that we will end up with a sufficient amount, namely 50%. More importantly we want you to specify that 80% of the affordable housing built will be for social housing. The reality is that most people cannot afford to

buy their own home however “affordable” it is and therefore the accommodation provided in the city should focus on affordable rental provision.

As you can see in our draft policy Ho03 Affordable Housing, we want you to use fast tracking, transparent viability negotiation, masterplans with small plot allocations and to require affordable housing in all developments of 4 or more homes in order to support this higher level of affordable housing provision.

### **Housing density.**

High housing density is good for making optimum use of land, results in a compact city more easily served by public transport, facilitates active transport choices, and potentially provides more affordable and energy efficient housing. At the moment the Local Plan sets a minimum of 30dph except in the central development area where it is 50dph. We find these housing densities shockingly low. The result will be a far greater loss of green space and more car dependency. If you look at the housing being built in the New Lubbethorpe estate it is designed around wealth and multiple car ownership - and the homes are being advertised for sale as near to motorway links with multiple car parking spaces and garages. We don't want this for the new edge of city developments.

**We propose a minimum of 100dph in the central development area and 70dph everywhere else – including in the strategic growth areas. This means that on greenfield sites where half the area is kept as natural land with trees, ponds and public access and density is increased in order to enable the same number of homes, housing should be in the 90-150dph range.** See our example policies Ho01 and Ho02.

90dph means terraced housing which enables residents to have small personal back gardens as in Highfields and Clarendon Park. The higher density of 150dph means there would need to be some low levels flats as well. In all cases of higher density housing there needs to be good lighting, reasonable floor space, flexibility to allow for occupants changing needs, good accessibility and above all high levels of soundproofing and careful design to make the resulting development attractive to people. It is entirely possible to build high quality terraced homes and flats for a range of family sizes so that people are able to stay near friends and family no matter what size of home they need.

### **Development areas.**

We entirely support the Plan's emphasis on the Central Development Area. Our concerns about the four major site developments on the edge of the city are mainly about loss of greenfield land with its associated loss of climate mediation, and causing car dependency and increasing car use with its inevitable increase in carbon emissions.

Looking at the Sustainability Assessment, page 6, policy appraisal, table 1.1, it is conspicuous that, with the exception of housing provision (which as we have already commented needs an extra question on climate viability and which might have reduced the score there had it contained this) none of the strategic growth areas on the edge of the city do well in the sustainability assessment. In fact, the only positive score is on housing with the exception of the Western Golf course which get a double plus for employment (where again we take issue with the questions making up the criteria) and land to the East of Ashton Green which gets a plus due to the secondary school which is planned. Additionally, all of the edge growth areas get a double negative/red for transport because they will inevitably cause increased car use.

As the Sustainability Assessment says on page 85, “New developments need infrastructure such as transport...and services such as doctor's surgeries, schools, community centres and local shops....Policies SL02 – SL06 do not identify the services and infrastructure that will be required”. This is exactly right. If these huge developments are to be sustainable from a climate/transport perspective, and if they are not to discriminate against people who cannot afford or choose not to have a car (a position which the council should be actively encouraging if they are to act on the Climate Emergency), they need a wide range of local services ranging from schools and surgeries to laundrettes, gyms, post offices, libraries, childcare facilities, etc. There is not currently any policy in this Local Plan which would ensure that such facilities are in place which means these sites are likely to end up causing car dependency, increasing car use and causing climate change as well as

only catering for the well off. Hamilton is already notorious in the UK for this kind of development and we don't want to see more of it.

All the strategic growth areas on the edge of the city should include provision for primary and secondary schools – at the moment only one of them does. One of the main causes of car use, congestion and poor air quality (especially around schools where it has substantial effects on children) is the school run. Children and young people are not going to do this by active and public transport unless the schools they go to are within reach.

**All of these edge based strategic growth areas also need to be strongly linked into the cities bus services and cycle lanes. It is not sufficient to have buses connecting them to the city centre. They also need to have services which link them to key employment and retail sites around the edges of the city without going in and out. Most importantly, these services need to be up and running at the point at which people move in** which has conspicuously not happened at the Ashton Green development so. People form long term travel habits within weeks of living somewhere and these are much harder to change once established. Such services could be supported by developers providing new residents with free bus passes as in the Beaulieu estate in Chelmsford.

Requiring a minimum of 70dph housing density along with development design which actively discourages car use would also make a big difference in these sites, allowing less loss of greenfield land at the same time as increasing local trees, ponds and keeping services and housing closer to each other so that people don't have to travel so far and are less likely to resort to their cars.

#### **Renewable energy.**

We are very much in favour of the ideas contained in your energy hierarchy in policy CCFR01. However, we want to see it **include a requirement to maximise renewable energy generation. Additionally, all the actions suggested in this policy should be required for all development – not just large development, and not just demonstrating what they are willing to do. Where possible there should be specific high standards set.**

We are supported in our concern that this Local Plan does not take renewable energy generation seriously by p85 of the Sustainability Assessment which states “the climate change policies (CCFR01 and CCFR02) do not require new developments to provide a proportion of their energy needs through renewables....This is in part because the plan cannot require renewables without evidence of their need and viability, and this evidence does not exist.”

Yes, of course new developments should run on renewable energy as far as possible, but if that energy is imported then it cannot be used elsewhere. As the country shifts to electricity for heating and transport, the demand for electricity will rise, and only if the energy supplied is renewable, will this have a real effect on carbon emission reduction.

By selling out to British Gas, the Robin Hood energy company (which Fosse Energy buys from) no longer reduces carbon emissions. Rather than increasing renewable energy generation, it buys energy already being generated elsewhere. The end result of this approach is that while what renewable energy there is gets directed to specific buyers, the renewable proportion of general energy supplied without green tariffs goes down. Clearly Leicester, like everywhere else, needs to generate as much renewable energy as possible. There are three things you can do in this plan to facilitate this:

**1/. Require all new developments to generate renewable energy – put in a minimum requirement, but also make it clear that the aim should be to maximise renewable generation.** See our policy CCDQP01 Sustainable design for new development.

**2/. Actively encourage business and home owners, and, where compatible with their historic character, heritage buildings to put solar on their roofs.** See our example policy CCDQP05 Delivering renewable and low carbon energy projects. Many people don't do this because they think they will be refused planning permission. Even on heritage building and in conservation areas, there are many roofs which are appropriate for solar generation without affecting their historic interest.

3/. **Commission a study** about which areas around and near the edge of the city would be appropriate for wind and solar energy farms, and about the city's need for green energy so that you do have evidence of need, viability and appropriate sites. **This study should form the basis for land allocation specifically and only for renewable energy generation development in this plan.** If, as is likely for wind generation the land found as appropriate for generation is beyond the city boundaries, commit to working with the relevant councils to get them to allocate it for generation in their Local Plans, or commit to buying it and making it available for generation development. Also make it clear that the council (potentially in the form of Fosse Energy) will sign contracts with renewable energy generating companies in order to support this development. See policy CCDQP05.

### **Energy conservation.**

We have combined the quality design and climate change policies because they are both about design. We have also strengthened the wording putting in requirements and standards and generally trying to make it more likely that all new development will actually end up being energy efficient. You can find these in our Climate Change and Developing Quality Places chapter. As well as ensuring new development is energy efficient by requiring high and specific standards to be met, there are many other policies in this draft of the Local Plan where energy conservation measures could be included. For example, in considering proposals to alter or extend listed buildings and applications affecting buildings in conservation areas, we'd like to see the Council encourage the energy upgrading of historic buildings by measures consistent with maintaining their special interest and in line with established best practice, published for example by Historic England and the Sustainable Traditional Buildings Alliance. See policy HE01 The Historic environment in our example policies.

Other examples are discouraging the floodlighting and lighting of signs, buildings, sports grounds and other areas at times of night when there are no people around. This doesn't only reduce energy, but also gives local wildlife a much needed respite from light pollution. Eg CCDQP10 Signs and banners design and advertisement location and OSSR15 Playing pitches and associated facilities.

### **Set targets and commitments to actively discourage car use and require travel plans from new development to do the same.**

In para 2.15 "households with no car" is presented as a negative, but it needs to become something the council is aiming for while also ensuring it does not bring deprivation with it. **We want to see this Plan setting specific and ambitious targets for car use reduction in and around the city.** This can be done in many ways – by charging for parking, reducing parking, putting in reserved parking for low emission car pool club cars, requiring travel plans designed to actively reduce car use, for example by car pooling, bonus systems, provision of bus passes, showering facilities and secure bike parking etc.

We would like to see this Local Plan **allocate a specific network of roads as car-free in this plan order to provide safe cycle and cleaner walking routes throughout the city.** This should be supported by a 20mph speed limit throughout the city (and if you could agree it with the surrounding councils, throughout the suburbs) which would not only make walking and cycling safer and more attractive but would also reduce congestion and air pollution as people learnt to drive more slowly and steadily, rather than the highly energy consumptive fast/slow mode of progression currently seen. **Fully segregated and continuous cycle lanes are also needed on all radial roads,** and reallocating space to this would send a clear message that cycling is prioritised over car use. Within defined residential neighbourhoods, design measures should be used to ensure that walking and cycling have very clear priority over motorised modes of transport.

Although they are mentioned in the occasional policy, eg student beginning and end of term traffic, **we would like to see travel plans committed to specific and ambitious car use reduction required systematically throughout the plan,** for example for places of worship, cultural facilities, businesses and sports grounds, and as you can see we have inserted requirements for them into many of our draft policies, for example CT01, CT02 and CT05.

Clearly it is also essential that the Plan and the Council ensure that public transport becomes reliable, affordable and runs where and when it is needed – in other words operates as a high quality network. The current draft plan mentions a bus partnership, but this has been talked about



for some time with very little effect. We would like to see you taking a far more proactive approach by **applying for a bus franchise** which would enable you to decide where, when and for what price buses would run.

### **Housing and green spaces.**

We recognise the difficult position the council is in where it needs to meet housing needs at the same time as conserving green spaces. However, **we strongly oppose the development of green spaces with public access which are used by local communities, and we also feel it is very important to minimise the use of greenfield sites beyond the city.**

After much detailed discussion among more than 70 of Climate Action's members, we reached agreement that we would like to see you do the following:

**Only give planning consent for the development of greenfield sites after all the available brownfield sites in the city have been developed.** This means ensuring the work is already underway on the brownfield site before giving planning permission for greenfield, as it is not uncommon for developers to get consent and then take many years or even decades before actually developing the site. Discussion our members have had with their councillors on this suggest that some councillors are under the impression this policy already exists in the Local Plan. As indeed it should be – but isn't so far. See our example policy SA01 Sequential test for brown and green development.

**Where green spaces are developed,** ameliorate the impact as far as possible (both on people and the environment) by **requiring at least half the greenspace allocated to be retained as natural space, planted with substantial tree cover, given ponds and given good public access.** This would at least mean that the heat island effect of the new development would be reduced. The trees should be chosen to be tolerant to the predicted changes in climate we will see in the coming decades, chosen to maximise carbon sequestration, and at least half of them should be food trees – especially sweet chestnuts for starch and nut trees for protein. Given the food shortages climate change is going to cause across the world, local food resilience needs to be taken seriously (we'll come back to this under land allocation). At the moment several of the greenspaces allocated for development in this Plan do not have public access. This means that at least in their cases, by making half of them public access green space there would be a local increase in green space.

Since many of the greenspaces in question are owned by the council, you are legally able to require whatever building standards you want. In the areas you own, we want you to **require carbon zero buildings – or even carbon negative** if they are built to **prioritise solar electricity production.** Such deeply energy efficient homes would be far more tolerant of the heatwaves coming in the next few decades. They should also be built to **actively discourage car use and support community sharing and cohesion** with communal growing areas and play equipment, space for tool and toy libraries etc. Since only half the space originally intended for development would be built on, the homes would need to be built to at least double the housing density originally planned for, which would have the advantage of being more energy efficient to live in, using less building materials to build, and probably being less expensive housing.

**Where you do not own the land, we want the plan to require 19% carbon emissions reduction above 2013 building regs,** and for you to make it clear that you want better than this, along with a clear commitment to prioritising this in planning negotiations.

See our example policy Ho02 Making the best use of Greenfield site allocations.

### **Trees and green spaces as partial solution to climate change.**

Given the many ways in which trees, ponds and green spaces can both reduce the effects of climate change and at least temporarily absorb some of the cities carbon emissions, we are deeply concerned by both the absence of a high quality tree policy in this Plan, and by the lack of awareness demonstrated about the potential for green spaces to defend against the impacts of climate change. We would like to see:

1. **Land allocated for mass tree planting** on the edge of the city, with an emphasis on climate tolerant species which will provide starch and protein as local food resilience becomes more important.

2. **Policy supporting the planting of street shade trees, policy discouraging the paving over of gardens and encouraging people to plant trees and keep their gardens natural and climate-friendly, policy requiring tree cover and ponds in new developments**
3. **Policy increasing tree cover and ponds in the green spaces of the city** – again with an emphasis on food trees.

Policy HW01 is one of the more positive sets of policies in the Local Plan containing provisions for access, air quality and open spaces all closely related to climate. HW02 provides for means to measure and deliver on HW01. This set of policies could be central to addressing climate concerns but the connection is not made.

We note that when the Sustainability Assessment looked at alternative options relating to open space it did not include an option of **increasing open space provision in deprived areas of the city**, rather than just retaining or reducing it. As the Sustainability Assessment says on page 59 “Open space is a major determinant of good health” and as we all know, the deprived areas of our city have some of the worst health in the country. do not have good health. The Covid pandemic has shown how essential publicly accessible green space is for people – especially those with the least access to resources such as money, cars, time and good health. We believe you should increase the open space allowance per capita for the city and consider creating new publicly accessible green spaces in deprived areas.

In the light of the capacity of green spaces to protect us from climate change, policy OSSRO2 (Chapter 14) is the wrong way round. Instead of listing the criteria under which recreational open space may be developed, priority should be given to use for planting, flood storage or other climate related uses when not required for recreation. Only if it can be positively shown that the land is unsuitable for those uses should the criteria for development apply.

The paving of front gardens is an important contributor to water run-off and flash flooding (as well as bleak street frontages) and controllable within planning powers. A paved garden makes it much harder for people to plant trees for food and shade in the future. Additionally, natural gardens with trees and bushes have the potential to improve biodiversity, increase local food resilience, cool streets and reduce dust during droughts and heatwaves, as well as increasing community interaction as people stop and talk to each other. We have drafted an example policy Ho10 Paving in gardens. The council needs to become much more positive generally about natural green gardens even if they are not always tidy – from a climate perspective they are valuable and will become much more so as they help to reduce the urban heat island effect.

### **Water security**

While this year has been relatively wet, it is worth remembering how severe last year’s drought was and imagining how much worse it could have been. If this means again **commissioning a study to find where the most appropriate areas for such reservoirs would be near the city**, then this should be commissioned in order to ensure that development agreed in this plan does not occur on key sites where water reservoirs will be needed in the future.

As climate change worsens, we are predicted to have warmer wetter Winters (which will mean increased flood risk) and hotter dryer Summers. As the Sustainability Assessment acknowledges on page 4 Leicester is in an area of ‘moderate’ water stress, with additional infrastructure likely to be needed for both water resources and wastewater management” and it has “Significant potential for flooding, with 37,000 properties potentially affected by surface water flooding.”

**We therefore want to see land allocation for one or more new water reservoirs** to be dug near the city – both to act as a holding area for flood waters and to ensure that the city continues to have an adequate water supply during droughts. We understand that, as with land for renewable energy, this means negotiating with nearby councils or buying land, but it is still an essential action for the city when it comes to living with climate change.

### **Monitoring and enforcement.**

As promised in para 2.14 a “robust monitoring framework” for the policies, targets and standards in the plan is needed and these should include climate impacts. At the moment, as para 21.3 makes clear, climate is not included. We suggest that where planning conditions such as energy efficiency and generation measures are put in place, these should be required to be certified by the



developers, and enforcement should check that certification has been met. We include this in our policies EDC01 Enforcement and other policies including Ho02, CCDQP01 and CCDQP02.

Once there are strong clear climate policy requirements in place, it is essential that they are enforced. At the moment Leicester's planning enforcement rates are considerably lower than in most other cities which means that developers can get away with failing to meet planning requirements. This needs to change otherwise however good the Local Plan's policies are, they risk becoming meaningless. PE01 says reported breaches will be investigated, but this doesn't go nearly far enough. We have drafted an example policy EDC01 Enforcement, but would hope to see you improve on it.

### **Alternative forms of housing: self build, student and HMOs**

Given the need you refer to in your housing chapter to provide homes of a variety of sizes and type, we are surprised by your positive attitude towards student only housing which prevents students from connecting to local communities, and also your negative attitude towards HMOs. From a climate perspective the first has a negative climate impact, reducing human skills and resilience and integration, while the latter can be positive as it enables people to share space, resources such as energy and water infrastructure, and possessions such as fridges and washing machines as well as potentially increasing human skills and integration into the local community. We have drafted alternative policies for these (see our Ho07 Student development and Ho08 Houses in multiple occupation) in order to bring these climate aspects to the fore.

Another area which you have weak policy from a climate perspective is provision to support people to self-build in energy efficient ways. We would like to see you commission a study about small 1-5 house sites in various parts of the city which could be allocated specifically for such building. This would encourage people to build with friends as well as in energy efficient ways, and would increase the skills and knowledge within a neighbourhood on issues which will become important as climate change takes hold (building and energy efficiency skills and knowledge as well as strong friendships increasing community resilience). See our policy Ho06 Self-build, custom build and community led housing. Housing communities and cooperative often provide affordable housing similar to rental for people who cannot afford to buy.

### **Other comments.**

We are concerned that the employment chapter says so little about the environment. Whilst obviously we support you helping "local business to reduce their carbon footprint by bringing together businesses concerned with improving their environmental performance." Page 134, policy E07, there is so much more you could do to reduce the environmental impacts of employment, ranging from incentives, support with funding and information, putting in requirements, etc. Similarly, the tourism and culture chapter doesn't even begin to acknowledge let alone try to address the environmental impacts of tourism, most notably transport.

### **Conclusion.**

We look forward to seeing the next draft of the Local Plan and sincerely hope that it will **contain much stronger and more detailed policies relating to the climate throughout, and that they will be phrased as requirements and not left as options to be ignored.**

Thankyou,

Low Carbon Planning and Housing Working Group, Climate Action Leicester and Leicestershire.