



Charity Number: 1164985

---

## LEICESTER AND LEICESTERSHIRE STRATEGIC GROWTH PLAN

Scrutiny Commission 7<sup>th</sup> February 2018

Comments by CPRE Leicestershire

---

### *1. Introduction*

The Campaign to Protect Rural England (CPRE) Leicestershire welcomes the chance to submit evidence to the scrutiny panel in relation to the Strategic Growth Plan (SGP). We will be responding in detail to the Consultation on the Plan in due course but we are still considering the document and its background material, so these preliminary comments are restricted to broad issues.

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

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

In this written submission we consider three key areas which we believe the committee should be looking at:

- the process by which the SGP is being developed
- the timescale, and
- the key elements in the plan.

Our comments should be considered as interim views and not comprehensive.

## 2. Key Points

The following key points are of concern to CPRE Leicestershire:

### *Process*

- Lack of local engagement in the plan's development.
- Reliance on evidence which has not been subject to external scrutiny, such as Midlands Connect.
- Lack of some detailed supporting evidence to date (particularly Environmental Impact Assessment (EIA) and Transport Assessment).
- Lack of public examination (EIP) to test the evidence for the Strategy before it is adopted.

### *Timescales*

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

### *Proposals*

- Reliance on housing numbers which exceed genuine demographic and economic need.
- Insufficient allowance for undesignated sites to come forward to meet housing needs.
- As a result, a risk that development will occur in areas of countryside at the expense of urban regeneration.
- Over-emphasis on large scale road building, particularly the A46 Expressway.
- Lack of detailed evidence considering the impact of these proposals on local roads, congestion and sustainable transport choices.
- Reliance on demand led evidence for large industrial and logistics site without an overall assessment of need across the West and East Midlands which could inform how much is genuinely required and will be taken up.
- Little detail on environmental protection.
- Risk that landscape and other designations will be treated as simply a constraint not an asset.

## 3. Process

In looking at the SGP process we appreciate that the Councils are restricted by Government Policy, in particular the lack of any Statutory Strategic Processes above

the Local Plan level, but we are still concerned about the implications of all this for local people and for interest groups such as CPRE.

We are concerned that up to this stage there has been a lack of engagement in the development of the plan outside the confines of officers and of the Member Advisory Group (MAG), comprising one elected member from each of the Leicestershire authorities. What discussion there has been has largely been with business interests, such as LEPs, which are unaccountable and unelected bodies. In our view this has led to a one-sided plan, which does not consider sufficiently alternative strategies for development or address fully the negative impacts of the strategy.

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

As a result the SGP, which has very little actual detail (for example, nothing to say where or what size actual roads will be), will still become a key document in determining the development of local plans when the details are put before the public for consultation and examination. This democratic deficit will be compounded by the proposed Memorandum of Understanding between local authorities on the contentious issue of housing numbers and distribution, coming before there has been proper public debate on that issue. All this risks leaving local people with no opportunity to have their say until it is too late.

A lack of some of the supporting information further exacerbates the problem for organisations such as CPRE who wish to scrutinise the SGP. Whilst the Landscape, Flood Risk and Utilities reports were published alongside the Consultation Document and the HEDNA is already in circulation, the Environmental Impact Assessment (Sustainability Appraisal) is not available at time of writing, although we are assured it will be published soon.

Even more worryingly, a key report on the transport implications of the SGP (as opposed to the vague justifications in Midlands Connect) may not be available during the consultation. In respect of the latter, CPRE strongly argues that further consultation responses must be allowed after that report is published. In response to a letter from CPRE, Pat Willoughby has said that they will 'assess more localised impacts but this will still be at a relatively high level, appropriate to a strategic plan,' and that the strategic context is provided by the Midlands Connect Strategy. While this is a clear position it is not one we agree with. The impact of induced traffic on local roads will have long term impacts for congestion, the economy and the environment and needs, in our view, to be fully understood before any strategic plan is progressed.

Lastly, in terms of process, the on-line questionnaire poses a number of important questions and we welcome the fact that these are being asked in a reasonably open

fashion. However, the preamble to some of the questions heavily leads the answers. An obvious example is the sentence: “One piece of infrastructure is absolutely critical to our draft strategy - the ‘expressway’ proposal for the A46”. In CPRE’s view this is a matter of contention which should not be assumed, as we will address later.

One option for addressing this issue would be to hold a Public Examination into the overall plan where all parties could present their arguments. While this would not fully answer our concerns it would at least mean the evidence could be tested before the plan is implemented.

#### 4. Timescales

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

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

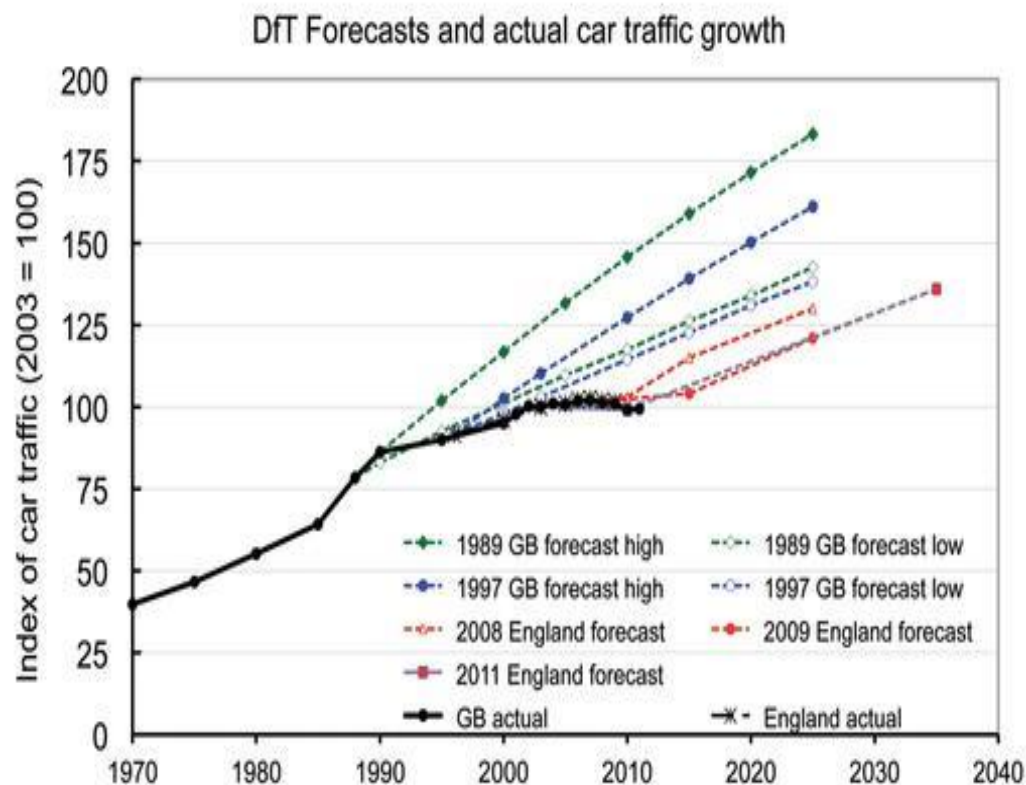


Fig 1. Comparison of DfT forecasts and actual traffic growth

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

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

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

This is not something we agree with. We understand why the HEDNA considers the period up to 2036 (which incidentally leads to lower annual housing requirements) as well as to 2031, it is because local plans need evidence to put to an Inquiry. However, the identification of land for a further 15 years makes little sense. Not only does it risk sites coming forward in locations which turn out to be unsuitable but it also threatens to undermine other initiatives, such as brownfield regeneration, which could better answer development needs.

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

Transport projects, of course can have longer lead times; however, again the requirement at Inquiry is normally for twenty years of traffic or patronage predictions. Even projecting that far forward can produce dubious economic results, especially when Cost Benefit Analysis is based on a large number of very small benefits (as in many road projects). This is only exacerbated by longer projections which assume a continuation of current patterns of behaviour even though we know that sociological changes, such as an ageing population, will almost inevitably lead to different patterns of travel.

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

## 5. SGP Proposals

CPRE supports the aspiration for a thriving and prosperous county. However, there are four areas where we have doubts about the SGP's conclusions.

We are concerned that

- a. the housing figures are too high;
- b. the transport proposals put too much emphasis on major road building;
- c. the need for large economic sites, particularly logistic, needs to be assessed over a wider area; and
- d. additional work needs to be done to ensure the Environment and Countryside is protected.

### a. Housing

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

Local Authority	OAN in HEDNA 2011-2036 (Adopted Figure)	Demographic Trend HEDNA 2011-2036 (Past Trends)	SNPP in HEDNA 2011-2036 (Government Projections)	Oxford Economic HEDNA 2011-2036 (Workforce Needs)
Leicester	1668	1516	1504	993
Blaby	361	301	278	300
Charnwood	994	947	950	735
Harborough	514	447	402	423
Hinckley and Bosworth	454	413	377	414
Melton	170	134	156	170
North West Leicestershire	448	378	304	448
Oadby and Wigston	155	129	110	126
<b>Total</b>	<b>4716</b>	<b>4265</b>	<b>4081</b>	<b>3608</b>

*Fig 2. Leicestershire Housing Figures for 2036 from HEDNA*

However, even on the basis of the figures set out in the HEDNA report, the overall need for housing across Leicestershire is open to question. The table shown in Fig.2 shows the total housing required based on Government population predictions, past trends and on economic need as set out in HEDNA. None of these account for the 4,700 dwellings per year in the HEDNA. Indeed, the economic figures suggest only 3,600 are needed, even though economic prosperity is being used to justify such high numbers.

The extra increase in housing need is justified in the HEDNA as a response to 'market signals', but increases are applied to all areas of Leicestershire whether or not prices have been rising and whatever the market signals say, something not required by Government policy.

The additional housing above Government predictions amounts to roughly 700 a year, something like 14,000 over twenty years, which is now, for lack of any alternative evidence, being extended further into the future.

Our report on the HEDNA also considered specifically the response to the higher end figures by Melton, North West Leicestershire and Harborough, all of whom want to exceed their annual need in terms of the allocations in their local plans, even using the HEDNA figures which are already above the number of households that are likely to actually exist.

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

In our HEDNA report we commented that North West Leicestershire, for example, had not included any small scale windfall sites in its provision, even though these have provided significant land, and are likely to provide land into the future. It is certainly hard to believe we will not see new large and small windfall sites coming forward in a major city like Leicester, beyond what is currently known.

The main problem, of course, with over allocation, particularly of market housing, is that it doesn't guarantee greater provision of much needed affordable housing. What it does allow is more housing to be built on peripheral, poorly located and car-dependent sites. This is already apparent in the approach to strategic sites.

We certainly agree that where new housing is developed it is important that local infrastructure, schools, medical facilities and shops for example, are included in the plans. But peripheral estates (what we generally call 'sprawl') are never likely to be able to provide the service levels of existing urban areas and. Even with the best public transport access they are unlikely to be as well linked to the urban core as existing areas.

Putting the emphasis on very large new housing estates can actually undermine the kind of organic growth which is likely to be more sustainable.

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

### *b. Transport*

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

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

The impact of large scale road building was examined in detail in CPRE's report 'The End of the Road' in 2017 which was based on research which examined post-operational impacts of recent road building. That report showed that economic impacts were over-rated and often happened in the wrong locations, that the roads generated significantly more new traffic than was admitted (so called 'induced traffic') and that they had significant environmental impacts.

One particular problem is that this additional traffic ends up on local roads which often cannot cope, (although the extent of the issue in this case has yet to be revealed). Notably the SGP refers to the need to address this issue in regards to the A46 Expressway, but does not consider whether or not the solutions would either be practical or acceptable, even though this would seem to be a prerequisite of taking the scheme forwards. People already living on busy and constrained roads into the urban centre from the bypass area may have concerns about the realism of this.

Midlands Connect took a largely traditional approach of examining inter-urban road schemes only in terms of notional time savings on the strategic highway network. The problem is that this is likely to lead to a long-term increase in car dependency just when we need to reduce it.

The alternative approach would be to invest in a step-change in public transport provision with much greater emphasis on managing local travel. This would both deliver sustainable transport goals, while reducing congestion in a long term and sustainable manner. That is not to say, it would seek to achieve the same goals as the major road projects, since it would primarily aim to encourage urban living and urban regeneration, while also supporting sustainable transport initiatives in rural areas.

It would include significant investment in strategic rail, including inter-urban improvements to links with Birmingham, London and the North, and that is something we support.



### *c. Economic Development*

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.

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.

The HEDNA identifies a demand led figure for B8 sites, amounting to 472 hectares (equivalent to 4-8 sites of 50-100 hectares). The problem is that these sites service a national market and there are already competing proposals in other areas of both the West and East Midlands. To take just one example, a 270 hectare site is being promoted at Four Ashes in Staffordshire through the National Infrastructure Commission, far larger than any local need can justify.

It might be argued that a large level of allocation will create competition between sites, but it is also likely that it will 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.

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 likely to be exaggerated and a more modest level of B8 provision should be progressed and further sites only identified when that is actually occupied.

### *d. Environment*

The last area which causes us particular concern is the environmental, landscape and countryside impact of the SGP proposals. Unfortunately there is, as we stand, no Environmental Impact Assessment of the SGP, but even that would probably only identify specific impacts of the proposals, rather than offering an assessment of alternative strategies which could reduce the environmental impacts.

The SGP has little to say in support of the environment or the countryside. Despite being identified as the fifth pillar of the strategy the document does not offer a vision of how environmental protection will be enshrined in the development process.

Tellingly, it says:

*“We have few national or international constraints but there are key features that are important to Leicester & Leicestershire, not least the National Forest, Charnwood Forest, Bosworth Battlefield, areas separating urban areas (our ‘green wedges’), valuable landscape and townscape, local nature conservation designations, civic heritage, conservation areas, etc.”*

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

Indeed, it is those areas closest to urban areas which are often most used by local people and it is many of those areas which are under threat both from housing and from the impact of major new road building.

Of particular concern to CPRE is the protection of the landscape of Leicestershire and we welcome the acknowledgement of the importance of areas, such as the Charnwood Forest, and some commitment to enhancing them, but overall we see this document as a potential threat to areas of landscape, particularly on the edge of Leicester. High Leicestershire contains valued landscape worthy of protection and the countryside on the borders of the city provides a valuable resource for the wellbeing of walkers, cyclists and others from the urban area and more widely. We are currently considering the Landscape report in this regard.

## **6. Conclusions**

In conclusion, Leicestershire CPRE would like the Scrutiny Commission to recommend:

- a. consultation to be extended should the Sustainability Appraisal and Transport Impact Report continue to be delayed;
- b. an Examination in Public (EIP) into the impacts of the SGP;
- c. greater caution to be adopted about any assessment beyond 2036;
- d. a review of the overall housing need and whether undesignated sites, particularly in urban areas may help meet genuine housing need;
- e. a review of major road building in the county, taking account of induced traffic and the impact on local roads;
- f. a wider analysis of the need for large industrial sites, particularly logistics; and
- g. a stronger commitment to promote the landscape and environmental assets of the county, and to stop referring to them as ‘constraints’.