

APPENDIX 1

DRAFT EAST MIDLANDS REGIONAL PLAN PROPOSED CHANGES COMMENTS OF LEICESTERSHIRE COUNTY COUNCIL

Introduction

1. Leicestershire County Council generally welcomes the Proposed Changes as providing an up-to-date planning framework for Leicester and Leicestershire. However, there are a number of concerns as set out below:

Housing

Overall increase in, and distribution of, housing provision for Leicester and Leicestershire Housing Market Area

2. The Panel recommended an increase of 1,625 dwellings compared with the draft Plan, to take account of the 2004-based household projections and that provision should not allow for any reduction in vacancy rates. The Panel also recommended that local authorities should agree the distribution of increased housing provision to take account of the 2004 based projections (recommendation R4.1).
3. In its representations on the draft Regional Plan, Oadby and Wigston Borough Council commented that the urban potential within its borough would allow the provision in Oadby and Wigston to be increased by 875 to about 2,250 dwellings. It was understood that the Panel's intention was that the increase in Oadby and Wigston would be part of the overall increase of 1,625 dwellings.
4. The Proposed Changes increase housing provision by 2,500 dwellings, 875 dwellings more than recommended by the Panel. It would appear that the increase to Oadby and Wigston's provision of 875 dwellings, has been applied **in addition to** the adjustment recommended by the Panel, which has been applied separately to the remaining authorities. There is no justification offered for what is effectively double counting.
5. **The overall housing provision for Leicester and Leicestershire should not be increased above that recommended by the Panel without a robust justification. The proposed increase of Oadby and Wigston's provision to 2,250 dwellings is consistent with the Plan's strategy of urban concentration and is supported. The proposed increases for other authorities are noted, but they will need to be adjusted downwards if the possible double-counting of 875 dwellings noted above is rectified.**

Burton upon Trent to Leicester corridor

6. There is reference in para 4.2.26 to the A38 / A511 corridor and the National Forest Line, in the context of the functional relationship between Burton upon Trent and Swadlincote. This does not go as far as the Panel Report, which considered the role of entire Burton upon Trent to Leicester corridor. Additional growth in the Burton upon Trent

to Leicester corridor should be considered as an option in the further Partial Review of the Regional Plan, due to commence in the autumn. Work is currently underway to assess the feasibility of reopening the National Forest Line to passenger traffic given possible future housing growth in the corridor.

- 7. The potential for additional growth to be directed towards the Burton upon Trent to Leicester corridor should be highlighted in the text, for further consideration in the forthcoming Partial Review.**

Phasing of housing provision in five and ten yearly totals

8. Policy 13 sets out district provision over five year periods (2001 to 2006 being completions) from 2001 to 2016, and the remaining ten year period to 2026. The 2006 to 2011 figures are based, where available, on trajectories published in annual monitoring reports. Such phasing will help to ensure that housing delivery across the HMA is coordinated as the various SUEs are built, and will help to inform the 3 yearly targets for the LAA.
9. The annual Leicestershire total for 2006 to 2011 is 2,540, compared with the recently agreed LAA target for 2008 to 2011 of 2,587. The annual Leicestershire total for 2011 to 2016 is 2,680 and for 2016 to 2026 it is 2,900. This is consistent with a gradual shift from urban regeneration centred in Leicester earlier in the Plan period to Sustainable Urban Extensions (SUEs) to Leicester and the Sub-Regional Centres later.
10. Some districts and the City Council have individual concerns about the phasing, relating partly to the current housing market, and partly to the need to phase development of SUEs later in the Plan period. If the earlier five year targets are set too high before SUEs can be delivered, there is a danger that smaller sites will be developed piecemeal which would be of particular concern in transportation terms. This and other concerns will be explored with the districts and City Council before comments are finalised.
11. The preparation of a Leicester and Leicestershire Infrastructure Plan will help to inform the detailed phasing of housing development.
- 12. The division of the overall provision into five and ten year periods is supported. However, when further information is available from the Infrastructure Plan, and if solid evidence is received that the current financial climate is affecting house building rates, some adjustments to the detailed numbers may be necessary.**

Proportion of total housing within the PUA

13. Part of the new policy setting out detailed district housing provision (Policy 13) gives a proportion of the total that should be within or adjoining the PUAs. For Leicester and Leicestershire, this is 47%, similar to the proportion in the draft Plan.
14. Policy 13 also allows for district and county apportionments to meet HMA minima to be redistributed via sound joint Core Strategies,

provided the PUA percentage is achieved. This may provide some flexibility for two or more local planning authorities to cooperate on a realignment of SUE locations.

15. The provision in Policy 13 for HMA housing to be redistributed is supported.

Expectation of joint development plan documents

16. Policy 17 on managing the release of land for housing has been strengthened to state that joint development plan documents (previously joint working) will be expected across the Leicester and Leicestershire HMA (amongst others). This approach will help to ensure that development is properly coordinated in the following areas:

- along the Burton upon Trent to Leicester corridor;
- around the Leicester PUA;
- between Leicester and Loughborough;
- between Leicester and Hinckley.

This is particularly helpful in the context of transport infrastructure provision.

17. It is understood that alignment of work on an Area Action Plan is already occurring between Leicester, Oadby and Wigston and Harborough in the context of the eco-town proposal at Pennbury. Other districts are proceeding individually.

18. Whilst this may result in initial delays, while joint working is initiated, it should result in better planning of SUEs and their infrastructure and could well bring about longer term time savings. This issue will be explored with the districts and City Council before comments are finalised.

19. The expectation of joint development plan documents is supported.

Less prescription for Sustainable Urban Extensions

20. The Proposed Changes are generally less prescriptive about the location of development in the form of SUEs. For the Leicester SUEs, there is reference only to “west of Leicester” and “north of Leicester”.

21. For the Sub-Regional Centre SUEs, the wording of Policy Three Cities SRS 3 refers to an amount of development, “located mainly at” the Sub-Regional Centres “including sustainable urban extensions as necessary”. For example, for Charnwood, the Policy requires 19,300 dwellings, of which 6,780 dwellings should be within or adjoining the PUA, including SUEs as necessary, with the remainder located mainly at Loughborough, including SUEs as necessary.

22. There is similar wording for Harborough, where it was not originally envisaged a significant SUE would be located. In addition, the Policy requires 820 dwellings to be located within or adjoining the PUA. Although the requirement for a small amount of development within

Harborough adjoining the PUA was identified in the work underpinning the County Council's advice to EMRA, it was considered at the time not to be strategically significant, and was not included explicitly in the advice.

23. The effect of this Policy would be to generally give more flexibility to the local planning authorities in determining the scale and number of SUEs, particularly as there could be some doubt over the meaning of "mainly". This is a particular concern because Policy 2 of the draft Plan, which provided guidance on selecting land for development, has been deleted. The less rigorous requirement regarding the size of sustainable urban extensions could lead to a number of locations being allocated for SUEs, resulting in development that is not large enough to allow adequate provision of facilities and infrastructure. This would have more significant and wider reaching impacts which would be less easy to mitigate, particularly in respect of highways and transportation.

24. The Regional Plan should include policy guidance to ensure SUEs are provided in significant blocks of development that are comprehensively master-planned to ensure appropriate provision of infrastructure.

Affordable Housing

25. The affordable housing requirement is set out as a total for the Plan period; 32,000 in the case of Leicester and Leicestershire. This is similar to the 33% of the total in the draft Plan. The LAA target for Leicestershire (2008 to 2011) is 490 per year.

26. The affordable housing target is supported.

Eco Town

27. References to infrastructure constraints on development in the southeast sector of the PUA have been watered down from:

"A number of factors, particularly the cost and feasibility of providing transport links to the major road network, rule out the prospect of planned sustainable urban extensions to the PUA in Harborough or Oadby and Wigston" to:

"...a number of factors make the prospect of planned sustainable urban extensions to the PUA in Harborough or Oadby and Wigston difficult without sustained and significant transport infrastructure investment."

28. It is not clear what new evidence has led to this change, which is a matter of concern.

29. According to the latest Government statement, the proposal for the Pennbury eco-town, if selected by the Government, would be considered for inclusion in the Partial Review of the Regional Plan. The County Council will face the challenge of new higher housing requirements in the Review, but it is essential that it is located in the best locations within the City and County.

30. The Review should therefore enable the tasting of alternative locations for future housing growth and this should not be pre-

empted by the selection of the Pennbury proposal in the proposed Planning Policy Statement on Eco-Towns (now expected in early 2009).

Employment

Strategic Distribution

31. The criteria set out in new Policy 21 to guide location of sites for strategic distribution include reference to access to good sources of labour.

32. This reference is supported because it emphasises the need for good public transport links with sources of labour, such as the need for good links between East Midlands Airport and nearby towns and cities.

Regional Priorities for Rural Diversification

33. There is now reference to "promote diversification of the rural economy" within Policy 20.

34. Whilst this new reference is welcomed it needs to take account of the capacity of the road network and priorities for reducing car journeys, the location, type and scale of the proposal and the benefit that development gives to supporting the rural economy. Reference should be made to Planning Policy Statement 4: Planning for Sustainable Economic Development which would support these priorities.

35. In respect of development in rural areas, explicit reference is now made to the need to avoid unsustainable development patterns that would lead to more and longer journeys.

36. The strengthening of this policy is supported.

Transport

Appendix 6

37. In line with panel recommendations, the Regional Transport Strategy and associated Appendix 6 are set out to be approved (with changes) as interim only to allow RSS to be published.

38. Appendix 6 has been amended and now includes only those major schemes that are either firmly programmed or have been clearly identified and have a priority in some other form (e.g. inclusion in Regional Funding Allocation, Network Rail business plan, etc.); schemes deleted from appendix 6 include M1 J21 to J30 phase 2 (review of Active Traffic Management in lieu of widening); multi-modal freight terminal at EMA (not sufficiently defined); fixed link to EMA (not sufficiently defined).

39. These changes are noted.

Environment

Green Wedges

40. Three Cities SRS Policy 3 relating to Green Wedges has been deleted and replaced by text requiring the review of existing Green Wedges or the creation of new ones through the LDF process. The deleted policy would have replaced the expired Leicester and Leicestershire Structure Plan policy relating to Green Wedges maintaining existing Green Wedges and setting strategic objectives for the function of the Green Wedges, many of which cross administrative boundaries.

41. Three Cities SRS Policy 3 relating to Green Wedges should be reinstated.

Town Centres and Retail Development

42. The urban concentration approach is further reinforced and now includes economic activity.

43. The strengthening of this policy and move towards urban concentration is supported, but it may be insufficient to steer retail to central locations.

Infrastructure Planning

44. A separate implementation plan, which will cover matters other than transport infrastructure, will be prepared by the Regional Assembly with the support of local authorities and other regional and national bodies.

45. This proposal is supported, but the resource implications for the County Council will need to be considered further.

46. Leicester City and Leicestershire County Council are commissioning work to undertake the preparation of an Infrastructure Plan for the Leicester and Leicestershire Housing Market Area. The overarching aim is to prepare a single, comprehensive 'Infrastructure Plan' which will assess the infrastructure required to deliver planned regeneration and growth across the Leicester and Leicestershire Housing Market Area for the next 15 years or so (to 2026).

47. The Plan will be broad in its scope including economic, social, environmental and transport infrastructure needs. Consultants are to be appointed to carry forward the work undertaken to date on infrastructure planning in the City and County area so that a sound and robust Infrastructure Plan can be in place by the end of February 2009.

48. The Proposed Changes adds an explanation that development needs to be related (amongst other things) to the best opportunities for maximising investment in existing and new infrastructure.

49. This proposal is supported.