Housing submission to the Leicester Local Plan Public Inquiry, from Climate Action Leicester and Leicestershire, Autumn 2024.

Matter 3: Housing, Matter 9: Delivering Design Quality, Matter 7: Climate change and flood risk.

We submit that in order for this Local Plan to be sound and mitigate and adapt to intensifying climate change, as required in paragraphs 157, 158 and 159 of the 2023 National Planning Policy Framework, it is essential that all new housing is designed and built in ways which:

- Minimise energy use and maximise renewable energy generation, and is safe, affordable and fit to live in as climate change becomes more extreme.
- Support people to live sustainably by giving them community connections, enabling them to use active and public transport, and ensuring that expensive, resource intensive, and carbon intensive retrofitting will not be needed in the future.
- Improve the city's infrastructure and enhance its green spaces, improving biodiversity, food supplies and people's mental and physical health while reducing the impact of heatwaves, flooding and storms.
- Is affordable to rent, buy and live in. People living on low incomes - and Leicester has extremely high levels of poverty - typically contribute the least to climate change, but they are also the people who suffer first and most severely as climate change takes hold bringing extreme weather and higher food prices. Housing should not require expensive retrofitting or increased energy bills in order to adequately heat, cool and ventilate.

Since developers are not currently choosing to build in these ways, and the building regulations do not yet require them to do so, this leaves the responsibility with local planning authorities to put in place - and enforce - planning policies which require new development to both mitigate and adapt to climate change.

The NPPF makes it clear that Councils should be developing plans which both minimise and mitigate climate change. In cities, the high concentration of people - and therefore tarmac and concrete - makes overheating and flooding particular problems as climate change intensifies. Added to this, in cities like Leicester where there are very high rates of poverty the need for systematic climate-aware planning policy is especially important.

Climate Action Leicester and Leicestershire and the organisations listed on this page strongly support the climate measures included in this Local Plan. However, given the increased flooding, heatwaves and storms, and food prices we are already seeing locally as well as across the world due to climate change, we need these policies to be strengthened.

This submission is supported and endorsed by the following local organisations:

Leicester Friends of the Earth.

The Race Equality Centre.

Aylestone Park Residents' Group.

COG Youth Services Ltd.

South Highfields Neighbours.

City of Leicester Deanery.

Caritas Leicester & Leicestershire.

Muslim Green Guardians.

Leicester Society of Friends (Quakers).

Transition Leicester.

Greenlight.

Footpaths.

Global Justice Leicester.

Our recommendations about how these policies can be strengthened resulting in a sound plan relates to the housing, climate change, and developing quality places parts of the Local Plan, which you are considering separately. In order to be a solution however, they all need to be acted on. We submit that Leicester's Local Plan should:

- **Require substantially higher levels of energy efficiency in new developments, MIQ349;**
- **Require higher minimum housing densities than currently proposed, MIQ 210 + 211;**
- **Require these higher densities be paired with public access on-site climate-enhanced green spaces, MIQ344.**

Matter 7. Climate change and flood risk. MIQ344.

As a city, we should be doing our utmost not to build on our already limited green spaces which act as a buffer to help reduce the impacts of climate change as well as absorbing carbon helping to minimise climate change.

However, where housing development on greenfield sites is necessary, we need to ensure that the development can mitigate the impact this will have on the city's capacity to live with and reduce its contribution to climate change.

In order to help the city cope with increasing climate change and a reduction in green spaces due to housing need, Leicester's remaining green spaces can and should be climate-enhanced. We advocate that this be directly linked to housing development and that developers be required to contribute to it.

Climate-enhancement would mean improving green spaces with (food) trees and ponds and mixed natural ground-cover plants to reduce the effects of flood, heatwaves, drought, and rising food costs. It also involves ensuring there is public access to these green spaces.

- Increased tree cover helps to reduce flooding and the heat island effect as well as sequestering carbon, providing food and supporting biodiversity.
- Mixed natural ground cover moving away from monoculture grass also reduces flooding, overheating and enhances biodiversity.
- Enhanced natural green spaces also improve our mental and physical health and help with community cohesion.

All of these are essential in the context of climate change where both health and community ties will be under increasing pressure.

Suggested additional climate change policy.

We would like to see this policy used alongside our proposed Ho05 Housing Density policy in order to ensure that higher density housing helps to reduce carbon emissions and does not result in additional heat island effects as temperatures rise.

Making the Best Use of Greenfield Site Allocations.

Where greenfield sites are developed inside and around the city, half of each site is required to be retained as green space with public access.

This green space should be required to be climate-enhanced with ponds, scrapes, trees and natural mixed ground cover to minimise the impact of flood and heatwaves on the surrounding area and to increase biodiversity. At least two thirds of the retained green space would be densely planted with trees and half of this area would be food trees.

The development will be required to achieve housing densities of 150 dph in the central development area and 90 dph in the rest of the city, and encouraged to achieve higher densities. Developers will be required to leave gardens, yards and communal spaces as natural ground for growing and not pave over them, or fill them with building rubble so that food growing is impaired.

All dwellings will be required to achieve a minimum reduction in CO2 emissions of 19% above the Target Emission Rate of the 2013 Edition of the 2010 Building Regulations (Part L). They will also be actively encouraged to achieve higher carbon reductions.

Developments on these greenfield sites will be designed to actively discourage car use and encourage walking and cycling using principles such as direct routes to bus stops, bus service provision, reduced car parking in bays, car parking only on the edge of the development, safe cycle paths and parking, the provision of carpool only parking spots, narrow streets, parking bays combined with trees rather than plain on-street parking, and housing without garages.

Developers are encouraged to think about and provide shared spaces for community use – ranging from covered washing drying areas and play areas to laundrettes, tool and toy libraries and shared office-type work space.

To ensure the planning conditions put in place as a result of this policy are met, developers will be required to provide independent certification that they have met the conditions. The council will check that independent certification is provided.

The enforcement of climate-related policy is essential. Independent certification which the Council can easily check up on is a straight-forward and affordable way for Leicester to ensure that these policies are acted on.

Matter 7. Climate change and flood risk. MIQ 344 and 349.

Given the intensification of climate change across the world (including the UK) in the past 3 years, requiring a higher level of carbon emissions reduction than building regulations which were developed in 2013 is clearly justified. Indeed we contend that failure to require this would leave this plan failing to meet the requirements of paragraphs 157, 158 and 159 part b of the 2023 National Planning Policy Framework.

We recommend that in order to make the plan sound, policy CCFR01 should require all new residential development (including student accommodation) to achieve a minimum 19% reduction in carbon emissions beyond the requirement of Part L of the 2013 Building Regulations.

Other councils with a range of economic viability assessments for example Ipswich, Brighton and Hove, Milton Keynes and Cambridge are already requiring this19% carbon reduction for new development in their local plans, and developers are acting on these requirements. See here for evidence of this.

These higher standards can be achieved on site through a combination ensuring optimal passive orientation to maximise winter solar receipts, improved air tightness and more thermally efficient fabric. These are all Building Regulation parameters of energy efficiency and no further on-building renewable or low carbon technologies are required to achieve the 19% reduction.

The scale of the benefit can be simply summed up as: for every five years of operation, such development will secure a reduction almost equivalent to an additional year's further carbon emissions. It would be irresponsible not to require such energy efficiency.

We also want to draw attention to the fact that most of the new housing development in this Local Plan is proposed to be on greenfield sites which have a higher economic viability assessment than brownfield locally. Given that these sites are likely to end up with higher rates of affordable housing built on them (see the policy Ho04 Affordable Housing) it is especially important that they do not require expensive retrofitting to cope with intensifying climate change, or cost more to heat and cool due to lower levels of insulation.

Matter 7. Climate change and flood risk. MIQ 344 and 356.

With regards to policy CCFR04, Low Carbon Heating and Cooling we submit that in order to be aspirational (paragraph 16 part b), proactive (paragraph 158) and effective in reducing greenhouse emissions (paragraph 159 part b of the 2023 National Planning Policy Framework), **policy CCFR04 is justified in requiring connection to district heat networks which are both energy efficient and can be switched away from fossil fuel to renewable energy generated heat relatively easily.**

Policy CCFR04 requires strengthening. We propose it be required that (in developments of over 10 houses without potential district heat connection) homes are required to be built with ground source heat-pumps to provide heating and cooling.

There are 4 reasons for this:

- In order to mitigate climate change we need to move away from fossil fuel based heating and cooling as rapidly as possible. Heat pumps run on electricity which can be generated using renewable energy such as solar and wind power.
- In the case of solar electricity this can be at least partly generated onsite improving local fuel security, especially in the wake of storm related damage to the national grid which is likely to become more frequent as climate change intensifies.
- Heat pumps can be used for both heating and cooling, and therefore used to reduce overheating in Summer as climate change intensifies, making new housing much more climate resilient.
- Ground source heat-pumps are quieter and often more energy efficient than air source heat-pumps, but are more expensive and carbon intensive to install once a house has already been built. They are most efficiently put in place at the same time as housing building occurs because of the disruption to the ground during building.