



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

Also endorsed by the 13 organisations listed on our previous submissions.
Matter 3: Housing, Matter 7: Climate change and flood risk,
[Matter 9: Delivering Design Quality.](#)

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 them.

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 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, because the effects of climate change tend to impact low-income communities first and foremost.

Climate Action Leicester and Leicestershire and the organisations listed above 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.

Matter 9 Delivering Design Quality.

These are our recommendations relating to Matter 8 about how these policies can be strengthened resulting in a sound plan under paragraphs 157, 158 and 159 of the NPPF 2023. They relate both to the housing, climate change and developing quality places parts of the Local Plan.

1. Policy DQP02

We generally accept the provisions of this policy and tall development is consistent with our view on housing density.

However tall building are prone to overheating and this is becoming an increasing problem as climate change intensifies.

This provision would improve the internal living quality of tall buildings and would substantially reduce the need for air conditioning therefore reducing energy consumption and consequent impact on the climate.

To DQP02 we therefore advocate adding a sub-section to provide for the reduction in solar heat gain in tall buildings - by orientation, window shading using such means as overhangs, external blinds, louvres, brises soleil, shutters and solar control glass and also via the provision of through-ventilation.

Matter 9 Delivering Design Quality.

Policy DQP04 Landscape Design

2. General approach

While we generally accept the provisions of the policy, we are deeply concerned that it is framed in a permissive way.

In sub-section c for example 'Respect and give consideration to' is much too weak and easily evaded. This sub-section should be re-written along the lines of 'c. Protect and enhance irreplaceable habitats'. Ancient woodland and veteran trees are valuable and necessary for climate mitigation and adaptation and should be firm constraints on development.

But where 'irreplaceable' habitats have to be lost new compensatory habitats of equivalent area should be provided. The requirement to 'consider' in sub-section d is also much too weak.

Landscape conditions requiring maintenance for a period of years into the future need clear targets for monitoring and enforcement to be meaningful. Performance against these targets should be regularly assessed and published.

3. MIQ 378. Tree cover.

We strongly agree that new streets in housing developments should be tree-lined, not only to reduce climate change related flood risk and overheating in, but also to reduce air pollution, improve people's mental health and encourage people to walk and cycle rather than drive. For the same reasons we also advocate that at least 70% of the open spaces in new developments have tree cover.

4. Front gardens.

The paving of gardens is an important issue contributing to the resilience of the city in the face of existing and known future effects of climate change. Domestic gardens account for a very large part of the green and open space of the city and the Royal Horticultural Society estimates that nationally one quarter of front gardens are completely paved. Within Leicester ever more front gardens are being paved over.

Water run-off from impermeable paved gardens increases the risk of flooding caused by overloading drains in storm conditions. Hard surfaces build up more heat. Paving reduces the presence of shrubs, trees and other plants which help to absorb water, reduce overheating, support biodiversity and improve mental health. The paving over of front gardens also produces a visually bleak street scene thus negatively affecting sense of place and wellbeing as well as reducing over-the-wall community interaction (people spend more time in their front areas when they do gardening there). As climate change intensifies mental health and community cohesion will become ever more strained and as well as necessary for people's wellbeing. Our city's planning policies should support mental health and cohesion, not exacerbate them.

Some local authorities, including Leeds City Council and London Borough of Haringey Council, have introduced supplementary planning guidance to offer advice on achieving a balance between need for parking with porous surfaces and a visually attractive street frontage. The Royal Horticultural Society has published similar advice.

We submit that including a paving policy in this local plan would help to support a transition to a low-carbon future and would improve resilience and thus respond to paragraph 157 of the National Planning Policy Framework 2023. It would also represent a proactive approach to mitigating and adapting to climate change in the sense of paragraph 158. The changes would help the plan to be both aspirational and deliverable as required by NPPF paragraph 16.

The local plan should contain a policy leading to supplementary planning guidance and to the introduction of Article 4 Directions to withdraw permitted development rights granted by Class F, of Schedule 2 Part 1 of the General Permitted Development Order 2015.

We see those permitted development rights as a significant problem when it comes to climate mitigation and adaptation.