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

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. 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 3. Housing. MIQ210 and MIQ211.

Requiring higher minimum housing density does not reduce the ability of developers to optimize land - it does ensure that land, and especially our very important green space, is used more efficiently. Low density housing not only results in fewer units of housing per hectare, it also results in more expensive housing - and Leicester's housing need is primarily for affordable housing. Higher housing density requirements result in the development of more housing units on any given area of land and makes them more likely to cost less and therefore be affordable for more households. We therefore propose policy Ho05 and Ho08 be improved as shown below.

By ensuring that new housing is built to higher densities, as well as to high standards of energy efficiency and next to climate-enhanced green spaces, Leicester could:

- Substantially reduce our carbon emissions, thus mitigating climate change;
- Address our affordable housing shortage (as higher density housing also tends to cost less to buy or rent) with less loss of green space;
- Reduce the high levels of fuel poverty in the city;
- Increase the resilience of everyone, and especially of vulnerable, lower income communities to the effects of climate change, by making the remaining green spaces more effective in both adaptation and mitigation of climate change.

Higher densities of housing in Leicester are important when tackling climate change for many reasons.

- They allow us to build on less of our green spaces and greenfield sites. Green spaces are key to reducing the impacts of heatwaves and flooding. They also help to support people's mental and physical heath which is damaged and strained by climate change. When planted with trees they also help to absorb carbon emissions.
- High density housing encourages and enables people to walk and cycle rather than drive, reducing the city's carbon footprint and improving air pollution and health. Low density housing locks people into car dependency, exacerbating climate change, discriminating against people without cars, and isolating people from their jobs, families and services.
- Higher density housing tends to be more affordable and can enable higher percentages of social housing to be built economically as more units are sold per hectare.

70-90 dwellings per hectare would involve terraced housing with potentially a few low-rise flats. It is possible at this density to provide both private and communal outside space. A good example is the Goldsmith Council Passivhaus development in Norwich.

100-150 dwellings per hectare, would involve more low rise flats and fewer terraced houses.

Suggested Policy Ho05. Housing Densities.

The City Council will support proposals that help the city to meet its housing needs in a sustainable way, increasing the availability of affordable housing both rental and privately owned, and reducing the causes and impacts of climate change. The following minimum housing densities will be required. Please note that for greenfield development, at least half of each greenfield site is required to be retained as climate-enhanced, publically accessible green space.

• Central Development Area – 100 or more dwellings per hectare (dph) on brownfield; and 150 dph or above on greenfield sites.

• Rest of the city – 70 dwellings per hectare; and 90 dph or above on greenfield sites.

The area measured to calculate the number of dwellings per hectare, is that of the area built on, not including the half of the original green space left as climate-enhanced accessible green area to reduce the impacts of climate change.

See our submission to Matter 8 (Climate change) for our proposal on how higher density greenfield housing can be designed to reduce carbon emissions and increase the City's capacity to adapt to climate change.

Matter 3. Housing. MIQ219.

Given the intensification of climate change we do not believe that the current policy Ho08 is positive or aspirational as required in paragraph 16 of the NPPF 2023. Nor would it result in safe and adequate student accommodation.

Student accommodation is a form of very high density housing, often in tall tower blocks. It is also typically extremely cramped, poorly insulated, prone to overheating and lacking adequate sound insulation. The fact that it is not expected to be good housing is why the current student housing policy explicitly says it can be limited to students in perpetuity. The underlying assumption is that it is not of a high enough standard for full time accommodation.

In the long run such student housing also runs the risk of being converted into permanent housing in the future. Given the nature of student housing and how housing markets in the UK work, the likelihood is that if it does get converted into permanent housing, it will be low income families who end up living there.

As climate change worsens, it is important for both students and other future residents that student accommodation is both able to cope with rising temperatures, and also fit to be converted into permanent housing if housing needs and behaviours change. The current policy suggests that it be exempt from the developing quality places policies which apply to other housing developments in this Local Plan. We submit that this should not be the case.

We therefore recommend that student housing policy Ho08 requires such housing to be built:

- **With high levels of insulation (19% above current building regulations),**
- **With external window shading (for example overhangs, shutters, external blinds, brises soleil or solar control glass),**
- **With provision for through-ventilation,**
- **Maximizing solar electricity generation,**
- **With high quality sound insulation.**

It should also be designed in such a way that individual units can be joined into larger ones for families in the future should its use change.