# COUNTESTHORPE PARISH COUNCIL RESPONSE TO BLABY DISTRICT COUNCIL LOCAL PLAN OPTIONS DOCUMENT CONSULTATION (12<sup>TH</sup> MARCH 2021)

#### Page 13 and 14

Q1. Do you think that the Strategic Objectives are suitable aims for the future of the District?

The Strategic Growth Plan is commendable in theory, but historically we have not seen it put into practise in Countesthorpe. The four key matters of the SGP of: delivering new housing, supporting the economy, identifying essential infrastructure, and protecting the environment and built heritage have not historically been addressed in developments in Countesthorpe.

Following previous development in Countesthorpe there does not appear to have been any significant investment in infrastructure and services. The first fundamental key principle for new development is that it should be "infrastructure led".

The Strategic Objectives claim to reduce the amount of development in existing towns, villages and rural areas; the projected plans at the moment suggest this is not the case. Our experience in Countesthorpe would suggest that we are not able to provide these services and facilities and in fact these services are being eroded. Since one of the objectives is to direct new growth to the most sustainable locations it would appear that Countesthorpe does not qualify as a suitable place for development.

Another objective is to conserve and enhance the districts' many heritage assets and their settings including conservation areas. Countesthorpe has a conservation area which would not be enhanced by any increase in traffic caused by new development which did not provide transport infrastructure outside of the village.

Narrow footpaths are a danger to pedestrians throughout the village but particularly on the main road through the village - Station Road. It is difficult to see how this can be changed to accommodate increased traffic or pedestrian numbers whatever development: either small, medium or large, particularly in light of the objective to mitigate the adverse impacts of growth on congestion, road safety and air quality all of which would be severely impacted by any local development.

We have concerns about how the identified local housing needs have been assessed and what rationale there is to support that need. We understand that the method of calculating Blaby district's current need of 360 homes per annum is broadly accepted. We further understand that in 19 years to 2038 therefore it needs to provide 6,840 new homes for itself. In the year to 31.3.20 it completed 427 homes and at that date had 271 under construction and had 517 with detailed planning permission. It had a further 4,130 with outline planning consent and a further 878 which were allocated for future planning permission. The total of all of these is 6,223. In the outline consents is New Lubbesthorpe and is likely that around 1,500 from this large-scale site would not be complete by 2038. Therefore, Blaby needs to find only approximately 2,000 new dwellings in its new plan.

Whilst accepting the need for collaboration between authorities we would question why Blaby District Council (BDC) has proposed a disproportionally high allocation of Leicester's unmet need and how can any of it be allocated to any Authority, until it is accurately assessed? What public consultation on the allocation of unmet housing and employment will be undertaken? Experience tells us that developers are not providing suitable levels of housing for the wider housing market. In Countesthorpe past developments have all provided housing of a similar type. This has tended to be 2/3/4 bedroom semi/detached houses on satellite estates that do not link to the village. There has, for example, been no studio, one person accommodation, no apartments, and few bungalows. There is little provision for starter homes or, at the other end of the scale, for the elderly.

#### Page 15 - 20

Q2. Do you consider that Blaby District meet only its own employment needs or contribute to meeting the needs of other areas in Leicester and Leicestershire?

Has Blaby truly met the employment needs of the local population of Countesthorpe or merely provided dormitory accommodation for those working elsewhere, this has led to enhanced traffic issues and a lack of sustainable resources. We should be discouraging long distance travel, so it makes sense to meet the districts own employment needs. Whilst accepting that large scale warehousing will provide extensive work opportunity we would question how many of those employees would live locally and what impact their coming into the area would have on the infrastructure.

The recent pandemic has accelerated the move to out of town and online shopping and, as a result, will Leicester and Leicestershire be seeking to redeploy current retail and brownfield sites in the City of Leicester?

#### Page 20 - 22

Q3. Do you agree with the proposed Settlement Hierarchy?

We are very concerned about the proposed re-designation of Countesthorpe to 'Extended Principal Urban Area'. This assumes that we have full local resources, amenities, services, public transport, highway infrastructure etc. This gives a misleading impression to local developers and clearly exposes the village to further additional unsustainable development. This approach even appears at odds with previous feedback made in the New Local Plan Option for Spatial Strategy, Sites and Strategic Policies document page 20 and listed below:

#### "What you told us:

- Protect existing communities and settlements from growth.
- Maximise the use of brownfield sites and windfalls.
- Conflicting views on whether garden villages (or similar) are a sustainable alternative approach to locating growth.
- Ensure there is sufficient and timely delivery of local services and infrastructure such as schools, health care, sustainable transport and open space to support all new development.
- Concerned about the impact of growth on local roads in terms of traffic congestion and associated air quality problems.
- Strategic sites / garden villages must be in sustainable locations and be large enough to be self-sufficient for services and facilities, public transport and employment.
- Strategic sites / garden villages are complicated to deliver and require long lead-in times. Smaller sites that can be delivered in the short and medium term are also required.
- Ensure a continual supply of housing from a range of sites varying in size, location and nature (including self-build). Do not rely on a small number of sites.
- Fully test and evaluate the alternative options. There should be certainty about the housing requirement and the funding and delivery of strategic infrastructure before a preferred approach is included in the Local Plan."

In particular BDC are trying to gather our support for a significant development of a Garden Village. The local plan needs to convince us that it will be able to guard against medium and short-term development before we are able to support the pursuit of a Garden Village.

If a Garden Village is pursued how is the local plan going to protect us from medium and short-term development when you are proposing to move us into the Extended Principal Urban Area?

#### Page 22 - 25

Q4. Do you consider that the Locational Strategy should include Strategic Sites where there are higher levels of growth?

We have yet to establish that there is a need for higher levels of growth. If such a need can be identified and agreed what assurance do we have that BDC is developing a holistic strategic vision for large garden village developments whilst bearing in mind the need to protect Countesthorpe from small and medium development.

In principle, we understand the need for consideration for strategic sites, however, it is a concern when two are surrounding Countesthorpe, this is a lot of growth in one place, in a relatively short period of time. These two sites alone could increase Blaby district's population by around 20%, which is certainly not warranted for meeting the district's own housing need. BDC are proposing that 54% (based on the government's measurement of 2.4 people per household) of the proposed strategic development will be in 2 mile radius of Countesthorpe.

In your document under 4.4.2: "The potential benefits of Strategic Sites identified in the Strategic Growth Plan include reducing the need for further growth on the peripheries of the existing towns and villages within the District and the corresponding pressures on infrastructure."

Q5. Do you consider that a range of smaller and medium sites located across a settlement hierarchy will also be needed to ensure the delivery of the total housing requirement?

You can only use so many houses: once the true LOCAL housing need is established the deployment of that need should be through either small, medium, or large but not all three.

We would repeat that BDC are trying to gather our support for a significant development of the Garden Village. The local plan needs to convince us that it will be able to guard against medium and short-term development before we are able to support the pursuit of a Garden Village.

If a Garden Village is pursued how is the local plan going to protect us from medium and short-term development when you are proposing to move us into the Extended Principal Urban Area?

#### Page 26, 27 and 28

Q6: How should we diversify the housing market in the District to meet the requirement to provide more housing on smaller sites (less than one hectare in size)?

The need for small development is understood, but there needs to be creative, strategic thinking of the criteria for smaller sites. This includes the development of brown field sites and the impact of sustainable resources and infrastructure of a small site, for example: Martha Close.

Q7: If you have promoted a site for development and it is considered a reasonable option in the Council's site assessment work, would you consider sub-dividing the site to allow small and medium housebuilders or self-builders to enter the housing market?

Not applicable

# Pages 29 – 32 no question seems to be attached to page 33

Q8. What do you think about the proposed policy approach to urban design quality and place-making?

Mental and emotional resilience and wellbeing must remain priorities. We have a responsibility and duty of care as Parish Councillors for all future and current parishioners and the impact of any new build and development can have on their emotional wellbeing. For example, avenues and green open space are important.

We question the recommendation of Countesthorpe being an Extended Urban Area under the proposal, and further question the rational for making this recommendation. What are the implications of reviewing the existing settlement separation to Countesthorpe in this category, in the light of the lack of resources and infrastructure in the village? See the response to question 3.

# Page 34 & 35

Q9. What do you think about the proposed policy approach to mitigating and adapting to climate change?

It is important for the design process to particularly consider global warming and from the start (be ahead of the curve) on designing sustainable housing for example: Eco housing, ground and air sourced heating schemes, solar energy, wind farm's etc. This should apply to large, medium and small developments.

There are obvious issues to do with air pollution resulting from the development of the motorway junction and the logistics park. The resulting HGV's will infiltrate into the surrounding communities. Proposed new plans/thinking appear to encourage movement into and across the communities. Significant pollution from traffic will occur as a result.

#### <u>Page 36</u>

Q10. What do you think about the proposed policy approach to flood risk?

We have real concerns about the recent increase in flooding in the village in different areas in both flood plains and main roads. We have to question how the building on traditional flood plains to the north east of the village has impacted on this. We have significant concerns about how planned future small, medium and large building will further impact on flooding in the village and towards the flood plains around Fosse Park. Whenever there is wider local flooding, traffic is diverted through Countesthorpe adding to congestion. Currently there is often no way in or out of the village when it floods.

There is no escaping that the more you put concrete down the more flooding will take place, so when you build a very large-scale development the impact could be seen miles down the watercourse. We know that there are many brooks and rivers around Countesthorpe that could be at risk if the area is overdeveloped.

Approach to flood risk often appears to be inadequate. Climate change needs to be taken into account and flooding risks taken seriously. Flooding in Countesthorpe is an already increasing occurrence. EG. Hospital Lane, Foston Road and local fields. Nearby Crow Mills is a well-known problem. These areas of flooding cause regular problems for traffic in and out of the village.

#### Page 37

Q11. What do you think about the proposed policy approach to biodiversity and geodiversity?

The ideas sound good in theory, but in practice will they protect valuable agricultural land and natural habitats? We are advised that several protected species are present within the local area. Is building on three hundred and seventy-seven hectares of farm land congruent with proposals?

#### Page 38

Q12. What do you think about the proposed policy approach to heritage assets?

We agree that it is important to protect heritage assets both in terms of archaeology and listed/historical buildings and farm land eg 'Ridge and Furrow'. There has already been a large amount of development on historical farm land, this is particularly an issue in Countesthorpe.

#### **Page 39**

Q13. What do you think about the proposed policy approach to environmental quality?

With regard to air pollution, building more houses where the vast proportion of residents already commute to work is not going to reduce air, noise and light pollution.

We need to highlight concerns from residents regarding anthrax burials in the local area on land which we understand is being considered for development.

# Page 40 and 41

Q14. How can the Local Plan best assist in the delivery of healthy communities?

We need protect Green spaces as they offer valuable benefits for both physical and mental health, in particular:

- Continuing to be able to walk in our countryside.
- Ensuring public footpaths are kept in good condition, accessible and not overgrown.
- Having clear way markers on public footpaths.
- Installing good quality long lasting accessible footpaths to Country parks and wooded areas.
- Ensure that a large area in a development has a wooded and parkland area.
- Improve and extend cycle paths and bridle ways.

Q15. What specific health-related requirements would you wish to incorporate in the Local Plan and its policies?

The provision of health care facilities needs to be monitored and coordinated to avoid unnecessary pressure due to increased population and overdevelopment of sites.

For any new development which will include new services and facilities, these must be in place before the houses are occupied and must be adequate for the potential number of households.

Adequate support services, including accessible provision, for at risk and vulnerable families and elderly residents need to be built in and adhered to.

We would expect any large or medium development to have a designated wooded and parkland area sufficient for the number of houses being built and to include funding to maintain and develop such facilities.

#### Page 42

Q16. What do you think about the proposed policy approach to Green Infrastructure?

The impression is that there is an increasing amount of development on the rural landscape. Looking at the Landscape and Settlement Assessment, Countesthorpe is being considered to be moved into the Extended Principle Urban Area, which means that the land all around the village has the potential to be developed. We would question why BDC is considering taking the lion's share of Leicester's unmet housing need and how this would benefit our local population and the impact it would have on the green space and biodiversity.

We have significant concerns regarding the characteristics and unique identity of Countesthorpe as a village.

#### Page 43

Q17. What do you think about the proposed policy approach to open space, sport and recreation?

We agree that you should have a strategic policy on open space and ensure that there is money put aside for this, so that the space can be used by everyone.

# Page 44

Q18. What do you think about the proposed approach for the designation of Local Green Spaces being undertaken through Neighbourhood Plans?

A Neighbourhood Plan is not something every Parish has and so should not be included in the Local Plan.

As it is not compulsory to have a Neighbourhood Plan, and is expensive to produce and keep updated, it would put Parish Councils who do not have one at a major disadvantage when it comes to designating green spaces.

If a neighbourhood plan becomes a compulsory component of BDC's local plan then adequate funding should be put in place to accommodate this.

#### Page 45

Q19. What do you think about the proposed policy approach to affordable housing?

We would expect a local viability assessment to take and a strategic plan to result and priorities local needs over those of the city.

#### Page 46

Q20. What do you think about the proposed policy approach to the mix of housing?

We would expect evidence from the housing market be used to assess the required local mix of housing as opposed to a market lead approach, which has led to a disproportionate amount of 3, 4 and 5 bedroom homes, driven by influential developers.

If you are supporting people to self-build by making land available what checks will you put in place to ensure that it is a genuine self-build i.e. extending the amount of time that they have to reside at the property before selling on. In the historical context of the development

of Countesthorpe, we have concerns regarding the allocation of self-build land and the potential misuse of such land.

Monitoring the combined impact on the infrastructure must be a consideration.

#### Page 47 -48

Q21. What do you think about the proposed policy approach to older persons and specialist housing?

Housing for elderly/disabled residents, including assisted living, should be a mix of specialist-built accommodation e.g. blocks of flats with services provided for a cost, together with houses in the community so that those people can still be part of the general community and not built as a separate community which could segregate and isolate the elderly and those requiring specialist housing.

Service charges on this type of housing should be closely regulated.

Recent development in Countesthorpe did not include housing provision of this type.

# Page 48 and 49

Q22. What do you think about the proposed policy approach to accommodating Gypsies and Travellers?

This is a sensitive issue and any policy review must be undertaken carefully to avoid sites being built in inappropriate locations.

#### Page 50 and 51

Q23. How can the Local Plan best deliver the necessary employment land and premises required to meet identified needs?

What are the identified employment needs?

Countesthorpe has minimal opportunity for employment. It is difficult to see how BDC can deploy resources to meeting Leicester City's employment needs when there appears to be an unmet need in Blaby District generally.

Strategic consideration should be given to how Leicester City can deploy brownfield sites, empty shops, garages, pubs etc to provide employment opportunities.

Q24. Are there any specific sites that you consider are suitable to deliver the employment land required?

There are brownfield sites in Leicester City Centre ripe for development. Further expansion of Fosse Park may be possible. Consideration should be given to utilising local facilities, which are currently closing down eg banks, post offices, shops, pubs etc.

Q25. Are there any employment related requirements you would like to see incorporated in the Local Plan and its policies?

Limit the amount of logistics parks and warehousing until the demand can be understood.

There should be a mix of employment opportunities eg high and low level skills and reward, in manufacturing, service industries and business.

#### Page 52

Q26. What do you think about the proposed policy approach to retail, leisure and town centre uses?

Fosse park has continued to grow, increasing parking and retail units. This area could easily be identified for some logistics with its proximity to the current junction of the motorway, along with utilising Meridian Business Park and Grove Triangle.

Creating and extending out of town shopping centres have the effect of taking customers away from the city centre. Significant consideration is needed to provide new innovative ideas for developing the city centre.

## Page 53

Q27. Are there any tourism related requirements you would like to see included in the Local Plan and its policies?

The only potential for tourism and retail recreation that we see is around Fosse Park and Meridian.

# Page 54 and 55

Q28. What do you think about the proposed policy approach to transport issues?

We have concerns that BDC are proposing a new junction 20A, at a time when we should be looking at more sustainable approach to transportation, such as the rail freight hub near to the M69.

It would seem appropriate to review the current transport network, particularly with the potential growth you are considering within the district, though we would question that, following Brexit and the decrease in birth rates per family over recent years, would we expect to have a 30% increase in population in Blaby district from now until 2050?

BDC mention in this section about providing walking routes, which is commendable, but we wonder how committed to this BDC are and how BDC can ensure that when there is a new development, good quality and natural walking and cycling routes are provided, between settlements and the city/towns. Going out on a bike can be terrifying on the roads, and to crowded on the pavements.

We would question the viability of extensive growth in the context of losing the funding for the A46, and would suggest any alternative proposed link road, attached to any new building development, would be unreliable and could not be guaranteed. We would question what alternative strategies have been investigated to control the increase in traffic of a large development. We would suggest that, in Countesthorpe, we would expect any major development to include a new bypass around the village that would take traffic from the east/west to the south and for restriction to be placed on traffic into the village from the north and the south. Currently the roads cannot cope with existing traffic coming in from both residents and as a result of the rat run from west/east through the village.

Q29. Are there any specific transport issues that the Local Plan should address?

As previously mentioned, our village's roads have narrow pavements. All roads throughout the village are used as thorough fares to and from surrounding towns and villages. Roads are particularly busy early in the morning and in the afternoon with commuter traffic.

Before considering any further building in the area, including any developments approved by neighbouring councils, our road network needs to be upgraded or some form of bypass considered (see Q28).

# Page 56 and 57

Q30. What do you think about the proposed policy approach to provision of infrastructure and services and facilities to support growth?

In theory, BDC's proposal seems to consider most issues around infrastructure, so provided these are met in the early stage of a development before services are stretched, your proposals seem reasonable. Recent experience in Countesthorpe would lead us to question whether these proposals would be implemented in practice.

Q31. Are there any specific infrastructure issues that the Local Plan should address?

See answers to previous questions. The infrastructure in Countesthorpe is a major issue, many of our services are struggling with the volumes of people in the village and before any future growth these issues would need to be addressed.

# **Page 58**

Q32. Are there any specific issues that the Local Plan should address in relation to planning obligations and developer contributions?

BDC should negotiate with developers for a wider range of support and amenities instead of stipulating for open spaces only. The funding should be for community use to allow groups to access funding for facilities and resources.

The village needs to have autonomy to deploy s106 and any other funding in response to locally identified need.