

Presentation to Parish Councils

Willoughby Waterleys Residents Association (WWRA)

17th February 2021

1. Introduction

Good Evening. My name is David Campbell-Kelly and I am speaking tonight as the Chair of WWRA and I am joined by a number of fellow committee members. I am also Chair of Willoughby Waterleys Parish Council and am a retired house builder with some planning knowledge. I would however not profess to have all the answers nor know everything, regarding the complicated planning scenario confronting us, with the Blaby DC (BDC) Local Plan consultation.

Tonight, we have representations from 11 Parish Councils and Neil Bannister as the Ward Councillor for Willoughby Waterleys and a few other Parishes in attendance. Thank you all for your attendance, which I see as vindication of the concerns we all have, over the proposals set out in the BDC plan. I will start out with an explanation of where we are currently with plan making locally, to the extent it affects the wider area of South Leicestershire, then lead into some information about the Blaby consultation and finish with where things may need to go to thereafter. Hopefully, this will last around 20 minutes and leave plenty of time for questions and discussion.

I would accept that different Parishes may well have different concerns to others and the main purpose tonight is hopefully to provide you with an alternative perspective, to assist you in your representations to Blaby, if you feel a response is necessary for your community.

2. Where are we now with planning?

Before looking at individual Authorities, it is important to understand the interrelationship between the Leicestershire Councils. They have a legal obligation to cooperate, to assist in providing help in meeting an unmet need in any adjoining Authority area. To satisfy this requirement, in 2018 the Councils, through the Members Advisory Group (MAG), prepared the Strategic Growth Plan (SGP). This in broad terms identified future growth to 2050 to the south and east of Leicester and was predicated on the possibility of the A46 Expressway, paid for as part of an upgrade to this major trunk road, by Central Government. You will now know that this is not progressing. MAG has not given up on the principles in the SGP and I understand that their desire is still to pursue growth in these areas and provide the necessary infrastructure funded from development.

In 2019, WWRA proposed to MAG an alternative strategy for dealing with strategic development in Leicestershire. This, whilst proposing development in more sustainable locations, also proposed improvements to the A46 trunk road in another way, which was more sustainable and more viable than the eastern by-pass route. It also had the benefit of reducing traffic at J21 of the M1. WWRA has never had a considered response from any quarter to that alternative strategy.

Q1. How will development in the A46 Growth corridor ever ensure the full completion of the totality of the infrastructure?

Q2. What alternative strategies to that set out in the SGP have the Councils (including Blaby DC) considered for large scale growth? What is their reaction to the alternative strategy prepared by WWRA?

Leicester City Council (LCC) concluded a consultation on its draft plan at the end of 2020. It stated that it felt it would be short by around 7800 homes by 2036 and these would need to be allocated to adjoining Authorities. This figure needs to be tested at a LCC planning Inquiry, chaired by a Government appointed Planning Inspector, before the plan is approved. Once that is done, the Councils of the County will have to prepare what is called a Statement of Common Ground (SoCG) and agree the split of unmet need with individual Councils. The SGP has proposed that the bulk of the shortfall should be allocated to BDC and Harborough DC (HDC), but this has never been independently verified by a Planning Inspector. WWRA submitted a response to LCC's Local plan consultation, stating that the unmet need of 7,800 was significantly overstated (possibly by almost 6,000). This was for a number of reasons, such as density assumptions too low, maximum use of land not being exploited and even addition errors! We believe that similar representations were also made by BDC and HDC.

Q.3 Why have BDC and HDC had a disproportionately high allocation of Leicester's unmet need and how can any of it be allocated to any Authority, until it is accurately assessed?

Q.4 Will there be public consultation on the allocation of unmet housing and employment in any Statement of Common Ground?

HDC adopted its Local Plan up to 2031 about two years ago and will now need to be thinking about undertaking a review of its Local Plan. The major sites in that Plan include Scraftoft and more locally East Lutterworth. I understand that the possibility of a Call in by the Secretary of State has passed now and that a planning permission will be issued on this mixed-use scheme including 2,750 homes in the near future. WWRA is watching with interest for HDC's response to the BDC Local Plan, given that its support for the SGP was conditional on the provision of the A46 Expressway.

We now turn to the BDC Local Plan. The current consultation started on 28th January and runs to 4.45pm on 12th March 2021. Responses to planning.policy@blaby.gov.uk The New Local Plan Options Consultation Document is available at www.blaby.gov.uk/planning The Plan Options document lists 32 questions and you may want to specifically answer some of these directly, in your response.

The BDC draft plan does not specifically allocate sites to meet its needs but summarises the sites it thinks has merit for future consideration, dismissing some from the Call for Sites carried out 18 months ago. It also includes the possibility of four Strategic Sites at Whetstone Pastures, Stoney Stanton, Elmesthorpe and Hospital Lane, Blaby.

The challenge Blaby has, is that it does not know with certainty how much housing land it should be providing. It has its own need to supply, which is a minimum of 360 homes a year. Within the SGP it has agreed to that allocation increasing to 912 a year from 2031 by taking a huge element of Leicester's shortfall. But as I said earlier, this figure is not yet verified, nor has it been independently assessed.

The method of calculating Blaby DC's current need of 360 homes per annum is broadly accepted. 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.

It is our contention that BDC should not be therefore considering large scale sites, such as Whetstone Pastures and Stoney Stanton, until LCC's unmet need has been properly assessed and allocated in a SoCG.

Q5. Why are you identifying major strategic sites when Leicester City has yet to verify its unmet need and it is still to be allocated between the Authorities?

3. What about Employment land?

You will know that given our position in the centre of the country, there is great pressure on the region to provide strategic warehousing. There are many large-scale developments already operating, with others under construction or planned. The largest in BDC's Local Plan for the future is the 4 million sq feet at Whetstone Pastures. What is not clear is, from a Strategic point of view where the demand and supply for such warehousing may end up. This has of course been exacerbated by the Covid pandemic. About a year ago the MAG agreed to undertake a report into the levels of demand and supply for Logistics. This report was due out in the summer of 2020 but is still to be concluded. The delays are, I am certain, due to the changes in demand caused by the pandemic. The question is, when we go back to normal, will the assessed demand still be relevant and appropriate. Worryingly we could get a planning permission issued, only for it never to be fully fulfilled because of a demand change. The report when issued will I am sure inform BDC's thoughts further.

4. Whetstone Pastures Garden Village

As mentioned earlier this is one of four possible strategic sites listed in the BDC Local Plan. It has been demonstrated earlier that, this should only be given consideration when LCC's unmet need is quantified and properly allocated.

But what are its strengths and weaknesses? The land is in one family ownership, making delivery much easier than it may otherwise have been. Also given its large scale, it is more able to provide infrastructure as a direct part of the development. However, there are other means of achieving funding from development for infrastructure. Community Infrastructure Levy is one way and can be introduced by any local authority to ensure funding for appropriate, relevant and identifiable needs. BDC has for some reason chosen not to adopt such a policy.

Q6. Why will Blaby DC not consider the introduction of a CIL policy for all development to contribute to the infrastructure needs of the District?

The Whetstone Pastures proposal identifies a new J20a on the M1. The developer has accepted this needs to be open before any logistics is operating. The proposal also includes the possibility of relocating Leicester Forest East services. It is said that this would be as part of Smart Motorway works for J19-23. Highways England's plans to 2025 do not include this work and there is only a vague mention of it in the post 2025 programme (RIS3). The argument is put forward that J20a will alleviate pressure at J21. Of course, opening J20a would allow north bound Leicester centre traffic to leave the M1 earlier but to where? Aylestone Road which has no capacity. It is worth noting that The County Council support J20a and are proposing £1.5m in their budget in the next two years for "advanced design works"

Q7. How does a new J20a on the M1 improve traffic at J21?

We have also identified a concern with the Garden Village proposal for logistics traffic to the west and south west. How will it get to the M6? None of the current options are satisfactory. North to J21 and then M69 or south to J20 and then A426 to M6 J1.

The scale of Whetstone Pastures is also one of its weaknesses. Any development proposal has to provide measures to mitigate the impact of itself on the surrounding area. A new motorway junction will have significant impact on traffic flows across a wide area of South Leicestershire, including many of your communities not to mention the significant traffic flows caused from and to the Garden Village itself.

Q8. What measures will BDC put in place to ensure strategic sites mitigate their impact and that the appropriate traffic improvements are properly funded and in place at the appropriate time?

A particular weakness of Whetstone Pastures is that of sustainability. The whole premise of the Garden Village is based on a new motorway junction and therefore reliance on the car. The argument of a self-sustaining mixed-use scheme does not hold true. Tritax confirm that for every 79 sq metres, there will be a full-time job created. That is 4,800 posts in 4 million square feet! The vast majority will not live in the Garden Village, having to commute from elsewhere, adding to the unsustainability of the scheme.

Q9. How will Blaby ensure that large strategic sites are truly sustainable?

5. Next Steps

Of relevance first, is LCC's local plan progress for the reasons explained earlier. They are theoretically slightly ahead of BDC but their position is complicated, by changes in Government policy which is seeking to ensure 20 cities (which includes Leicester) increase their future housing supply. We are yet to understand how this will affect the local plan process in LCC and the adjoining Authorities.

In terms of BDC, following the closure of the consultation period, they will consider representations made and then issue a final version of the Local Plan. Following another consultation period this will be subject to an Inquiry by a Planning Inspector in late 2022. Adoption will be likely in 2023.

What WWRA is seeking to achieve, is to provide a robust representation at this stage. This will give us a good platform at the Planning Inquiry, if necessary. The issue will be, by who and at what cost and how will it be funded? So far, the members of WWRA have been incredibly generous to get us to where we are, and we are progressing well with our representations. These are being prepared by our planning consultant. But representation at the Inquiry will require funding of a different scale. If there is to be a strong case put forward, it needs to be in a coordinated manner. If you are one of the communities that feel that BDC needs to be challenged, are you able to galvanise support from your Community and join us?

David Campbell-Kelly

Chair WWRA

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