



Climate Action Leicester and Leicestershire's response to the Oadby and Wigston's Local Plan consultation.

Endorsed by:

Our response is in 3 parts:

- Firstly the 8 key points about the draft Plan (page 1-3).
- Then some specific detail comments about the Local Plan (page 4-6) and your Design code (page 7-9)
- Two attached documents containing specific suggestions which we would like to see you incorporate into this Local Plan:
 - Attachment 1: [Transport and climate: designing housing to reduce car use](#) which we put together in 2022.
 - Attachment 2: [Housing density](#). We put this together in Sep '24.

We have 8 key points to make in our response to this draft Local Plan.

- 1. Detail. While it contains many excellent aspirations, the plan lacks detail, targets and specific requirements (as opposed to hopes and expectations) making them unlikely to be acted on.**

An example of this is page 43, Policy 5a Climate Change. You say buildings are “expected” to improve energy efficiency but you don’t say to what standards, or make this a requirement rather than an expectation. Obviously new development will have to achieve the Future Homes Standards of efficiency, but we’d like to say this is a minimum and that you expect and will support improvements on it – for example with a target of PassivHaus standard.

- 2. Energy efficiency and insulation. You should be requiring a fabric first approach to energy efficiency, in other words, insulation to achieve the vast majority of reduction in energy use before additions like solar and electric heat pumps are factored in. This would improve homes resilience to the effects of climate change as well as substantially reducing their carbon footprint and the cost of heating them.**

Page 43, Policy 5a on climate change: Again we would like to see specific details, for example a requirement to use insulation to reduce energy use by 80% or to PassivHaus standard.

3. Solar generation. Require more than 10% of each home's energy use to be provided by solar on the roof of the building. We suggest 30%.

Page 54 Policy 8, part 1, Renewable Energy. It's great that you are requiring some energy to be generated on the building. However, the wording here needs clarifying to make it clear that you are talking about whole solar systems which generate rather than just wiring in preparation for systems to be added.

By requiring buildings to be built with a fabric first approach (see our 2nd point) the building will require less energy and it is therefore possible to require a higher proportion of energy to be generated onsite – hence our suggestion of 30%.

You also need to require buildings to be oriented so as to maximise solar gain.

4. Housing density. Require higher housing density to minimise land use, support less car use and increase energy efficiency. This also allows for more green space, reducing climate impacts.

P59 Policy 3a Housing density. We advocate for an increase of 20dph (dwellings per hectare) for each of the minimum housing densities you propose for different areas. A higher housing density does not have to change the character of an area with careful design. Higher housing density means less of an area ends up concrete and tarmacked over, allowing more of the area being developed to be retained as greenspace. This reduces both flood risk and the build up of heat during heatwaves. It also leaves outside green space where mini forest and ponds can be put in supporting both nature and residents access to nature.

In the town centres 70-80dph can easily be achieved while still offering some private outside space ([see the Goldsmith development](#) in Norwich as an example of this) and fitting within your design suggestions. Small rows of terraces with occasional connected 3-4 story flats can achieve this.

For policy 3b on the edges of urban areas we propose 50 dph, again using small groups of terraces as a way to increase energy efficiency, decrease land use and reduce sprawl which increases car dependency.

For policy 3c we want 40dph as a minimum.

These should all be combined with an increased requirement of affordable social housing to 30% on greenfield and 20% of the homes built on brownfield sites. Leicester City's economic viability assessment found this to be entirely valid and there is no reason to think it is less so in Oadby and Wigston. The economics should be helped by the higher housing density requirements as it will allow for more units to be built on less land.

5. Improve bus services. Please require bus stops within 300m of all new homes, require developers contributions towards improved bus services and ensure roads are built to support sensible bus routes.

Your transport policies say you support a shift from car towards sustainable modes of transport, but you lack detail and requirements. What specifically will the council do to ensure functional bus services, including to secondary

schools? For example Leicester as a whole needs circular bus routes ensuring that movement to nearby places, eg Oadby and Wigston is easy, unlike at present. Will you work with the transport authorities to put such services into place and require developers contributions to enable you to subsidise and ensure the running of such services?

6. Design against car use giving specific examples and requirements, including encouraging parking on houses to be distanced from housing to the ends of roads.

This plan has good ambitions to encourage a shift towards active and public modes of transport. However it says nothing about requiring design which actively discourages car use which is a huge missed opportunity to create a much larger modal shift.

We would like to see parking designed to be slightly less convenient, with residents car parks separated to the ends of roads (with tree cover to reduce flood risk, enhance biodiversity, absorb air pollution, or solar panels covering these car parks to for charging points) instead of on the whole street. This means streets can be narrower with more street trees, making them more active transport and child friendly and less polluted.

7. Ensure access to services within a 15 minute walk. In the case of primary schools and basic food shops they should be within 10 minutes walk of all new homes built.

Policy 17 3a sustainable transport. Your basic hope for accessible services is excellent. However, to be effective a walking distance to key services needs to be made a requirement - it is not sufficient to simply "encourage and support". Shops and primary schools should be within 10 mins walk, other key services within 15 mins walk and secondary schools within 15 mins cycling distance with segregated cycle lanes leading to them.

8. Paving front gardens substantially increases flood risk and temperature extremes as well as impacting negatively on nature and community cohesion.

Climate change is causing increasing heavy rain storms, often after droughts, as well as much more intense Summer heatwaves.

We support your position that where paving occurs it should be done with grasscrete. However we don't support the use of block paving which cannot absorb heavy rain and therefore does little to reduce flood risk.

We want to see you require grasscrete, slightly sloped towards at a minimum of 2m² planted with trees or shrubs to help absorb runoff during heavy rain.

The trees and shrubs would also reduce surface temperature extremes, and improve biodiversity and visual amenity.

Notes responding to specific parts of draft Local Plan.

Policy 5 Climate change (strategic)

P43: The principles in this policy are good, but there are no specifics. For example we'd want to see you:

1a. specify a requirement to use low carbon building materials such as low carbon steel and concrete.

1b. requiring more than 10% solar on roofs, and building orientation to maximise it rather than just the wiring as required in the Future Homes Standards. We suggest 30% which would be made possible by the fabric first approach to energy efficiency. Requiring development-wide ground source heat pumps heating systems for developments of more than 10 homes.

1c. designing to actively discourage car use, not only encourage active and public transport choices. These 2 things strengthen each other. Provide a list of things which can be done and require that a minimum number from the list are incorporated into the development, eg new developments should be made less car centric by moving parking areas to edges of new developments – and including trees or solar in parking areas, ensuring frontages have soft landscaping and provide less rather than more off road car parking, blocking through car traffic by making one end of street only open to bikes and pedestrians, ensuring that cycle paths are safely segregated from car use on busier roads. **See our attachment 1: Transport and Climate for our suggestions on this.**

1f. Again we want to see specifics: how many street trees/how much canopy cover?

1j. requiring window shading and cross ventilation – again it's about providing a list of things that help and requiring some of these things are used – you could always say they can use something equivalent that is not on the list so long as they specify and justify that thing.

Policy 6, flood risk.

P48, 4. We know flooding is going to become much more common and extreme as climate change escalates. Flood zone 3 should absolutely not be developed with buildings or paving at all. Such areas should be managed as water meadows to help reduce flood risk to surrounding areas and increase biodiversity.

P50, 10: water management. There is good stuff in this section, eg c,d and e. However, you need to discourage hard surfaces more actively, and require some tree/shrubs where hard surfaces are to help absorb runoff. The hard surfaces should be tilted towards the trees/shrubs. Grasscrete is fine, but block paving is not because in the heavy rainfall which is becoming more common, permeable hard surfaces cannot keep up and cause flood risk.

Would like to see more 'must' and fewer 'should consider'.

You need a policy to firstly discourage, and secondly reduce the increased flood risk caused by the paving over of front gardens. It should require that where paving is done it requires not only permeable surfacing (grasscrete not

block) but also an area with trees/shrubs and the tilting of the surface towards them to help absorb heavy rainfall, reduce overheating and improve biodiversity.

Policy 8 low carbon energy.

P54, 1: does this mean actual generation rather than wiring/ renewables ready? If so it's good that you are requiring actual generation but the wording needs to be clearer, and we'd like to see 30% rather than 10%. It also needs to require the orientation of building to maximise solar gain.

P55, 2a: should be actively encouraged, not just supported in principle.

Policy 10 housing density

P59 3a We advocate for an increase of 20dph for each of the areas minimum housing densities. In the town centre 70-80 can easily be achieved while still offering some private outside space (see the Goldsmith development in Norwich as an example of this).

3b 50 dph and 3c 40dph as minimums. These should all be combined with an increased requirement of affordable social housing to 30% on greenfield and 20% of the homes built on brownfield sites. Leicester City's economic viability assessment found this to be entirely valid and there is no reason to think it is less so in Oadby and Wigston. The economics should be helped by the higher housing density requirements as it will allow for more units to be built on less land.

Please see our attached document 2 on housing density.

Policy 17 sustainable transport

P84, 3a: The basic concept here is excellent in essential. To be an effective policy however, a walking distance to key services needs to be made a requirement. Shops and primary schools should be within 10 mins walk, other key services within 15 mins walk and other schools within 15 mins cycling distance with segregated cycle lanes leading to them.

3b: it is not enough to simply encourage active and public transport, policies also need to be in place to discourage car use – see our earlier comments on policy 5. This is because people are much more likely to take advantage of active and public travel opportunities if car use also becomes less convenient. As humans we tend to do what is familiar and change takes a push (sticks) as well as encouragement (carrots).

P85, g: for larger developments, developers should be required to both help fund and ensure that there is a regular bus service (minimum half hourly) in place before homes are occupied.

Policy 18 Active design and travel.

P87, a: what specifically will the council do to ensure functional bus services, including to secondary schools? Specifically Leicester needs circular bus routes

ensuring that movement to nearby places, eg Oadby and Wigston is easy, unlike at present. All housing should have bus stops should not be more than 5 mins walk from people's homes.

b: cycle and walking routes to train stations are also essential.

Again, please see our attachment 1: Transport and Climate for our suggestions on this.

Policy 20 parking

P93 Too much car parking is an important part of encouraging car use rather than shifts to cleaner healthier modes of travel. Suitable car parking should include in the case of car parks: higher parking charges, cycle parking near entrance as you have said elsewhere, covering parking areas with either tree canopy as shade or solar panels for electricity generation. On street parking should include specific parking spaces with charging points specifically set aside for car-pooling on every street, separating parking to street ends to make it a little less convenient and street trees to provide both separation, pollution absorption and shade.

Policy 21 community facilities

These should be supported to reduce their car parking provision and provide car sharing and pooling opportunities turning the saved land into natural space with trees and shrubs, they should have bus stops outside them and travel plans to support their users to reduce car use and use active and public transport. All this is even more true for new community facilities.

Policy 22 open space

Outdoor sports facilities should minimise nighttime lighting, avoid the use of astro-turf and include trees around the edges of sports pitches to provide shade and flood protection as well as biodiversity.

We strongly support p104, 4b requirement of public transport links.

Policy 23 public realm

P106, this policy should include discouragement from using hard surfaces everywhere, and encourage a move away from concrete and tarmac but also astroturf/plastic grass. It should encourage multi-species micro forests, play equipment.

Should look at natural environment

Policy 28 Sustainable design and construction.

This policy should include a requirement for housing development to take care of the soil in front and back gardens ensuring it is fit to grow in and not filled with rubble or waste.

Notes responding to Design code.

Our over-riding concern with this design document is the lack of requirements around fabric first/insulation based energy efficiency, low energy heating systems and solar generation. The climate change policy 5 in your draft local plan says new development is “expected to” reduce energy use and generate renewable energy along with other key climate related actions. Therefore we had expected that this design code would make specifics and set requirements - as for example it does for parking requirements – about what this would entail. It fails to do this. PLEASE ADD IN REQUIREMENTS AND SPECIFICS ON INSULATION, SOLAR GENERATION AND HEAT PUMPS AND CAR-REDUCTION MEASURES.

Our comments on specific parts of this design code.

P16, 6.6: Continuous boundaries of 30+ meter should require a tree/large shrubs in every garden, not just every 4th.

6.7: These trees should be chosen for resilience to climate change and variety, and include food eg walnut, sweet chestnut, apple.

P20, 7.3: The aspirations in 7.3 are great. They need to contain specifics and requirements. For example: Require specifics such as cross ventilation and window shading to minimise overheating, require fabric first approach to energy efficiency and a list of ways in which a new development could be made less car centric e.g. moving parking areas to edges of new developments – and including trees or solar in parking areas, ensuring frontages have soft landscaping and provide less rather than more off road car parking, blocking through car traffic by making one end of street only open to bikes and pedestrians, ensuring that cycle paths are safely segregated from car use on busier roads. **There are examples in our Attachment 1, transport and climate.**

Re building materials, you should require developers to use low carbon steel and concrete. These are both available and economically viable.

You don't have to specify that every development should do every specific thing on your list, but you should say you require then to do a minimum number of the things including from each category eg insulation , energy generation, transport mode shift etc.

7.6 a higher proportion of these should be about trees and shrubs.

P23, 7.14: some street trees should be required on smaller/other routes. They reduce flood risk, overheating and also reduce extreme cold in Winter as well as supporting biodiversity and mental health. They also help to make sites less car centric.

P24, 1.19: Please make it clear that you expect higher than current housing densities at the same time as fitting with the character of existing settlements – **see our Housing Density attachment 2.**

What do you require these densities to be on stand-alone sites? We want higher densities of mixed housing (both number of bedrooms, heights, flats, garden size/balconies) and type but with an emphasis on terraced and 3-4 story flats, not semi-detached. This should push densities up to 50-80dph ensuring less land use and encouraging people to walk rather than drive as it would sprawl over less space.

7.20: some of these should be required not just suggested. This includes higher housing density, segregated cycle lanes, street trees

7.22: this is a good place to add in requirements for parking for a street in order to provide a small separation between homes and parking.

7.24: alleyways are essential to provide through routes for pedestrians and cyclists when it comes to crescents and cul-de-sacs. They do need to be safe, so please put in minimum widths and sightlines but ensure that they exist, otherwise you are pushing people towards car use.

7.28: communal parking (with trees and/or solar coverage) should be provided alongside bin storage instead of on street parking. This will help with access for emergency and waste collection as well as allowing for more street trees, safer cleaner active transport use and discouraging car use.

P27, 7.31: tree surrounded parking areas can be put on backs as visually they look like gardens. This allows frontages to be greener and more aesthetically pleasing as well as discouraging car use.

P29, 7.47. These are very good ambitions which we strongly support. However, to be effective when it comes to design it would be useful to have specific requirements in place, eg all closed roads must have cycle links at the closed ends, all new homes must include space for secure and easily accessible from the road cycle storage, etc. As with energy efficiency and generation, you should be requiring a minimum number of actions from a list of specifics, not just be designed to encourage or think about.

P30, 7.51 Open spaces should be climate-enhanced to reduce both carbon footprints, and the effects of climate change. We would like to see at least 50% tree cover including the use of mini forests and food trees to provide shade, reduce flood risk and surface temperatures, sequester carbon and support nature. IT also involves putting in ponds to also reduce flood risk, support biodiversity and make surface temperatures less extreme. We also want to see design requirements reducing hard surfaces – use grasscrete, board walks and narrow paths rather than large hard surface areas. Again this will reduce temperatures and flood risk.

P32, 7.53: spaces between back gardens and corner plots should be used to separate on parking away from homes. We want grasscrete not block paving, resin (or concrete or tarmac). Garages should be designed to link homes together and increase energy efficiency, car ports should be designed to generate solar energy where possible.

P32 7.56: we do not support on street parking as the convenience encourages car use. Therefore we do not support getting parking spaces as close to front doors as possible. Instead parking as described in 7.54 with trees is much more positive and still allows for car use. Where on street parking is necessary (and this should be specifically limited), it should be interspersed with street trees.