



COSBY PARISH COUNCIL

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Re: Blaby District Council

Local Plan Options Consultation

Response from Cosby Parish Council

CONTEXT:

Over-arching the response from Cosby Parish Council is the ambition to protect the village from over-development, to maintain the “Cosbyness” of Cosby and to address and resolve well-documented traffic flow and traffic management issues within the village.

Over three years Cosby Parish Council has sponsored the development of the Cosby Neighbourhood Development Plan (CNDP) and it is expected that the CNDP is given full recognition and consideration as the Blaby Local Plan advances, in short, it is expected that the CNDP is given “full weight” for any development in Cosby and that any the cumulative impact from growth in neighbouring settlements is fully considered and accommodated within the Local Plan. The Infrastructure Development Plan (IDP) should pay particular attention to cumulative impact and neighbouring settlements.

The development of the Strategic Housing and Employment Land Availability Assessment (SHELAA) although recognising that this is land put forward by land-owners, developers and promoters and does not pre-determine planning applications, with the current potential capacity of the named locations in Cosby, COS009, COS010, COS011, COS012, COS013 equating to est: 1,075 dwellings should be taken alongside the “up to” 180 dwellings with extant planning permission on Cambridge Road and clearly presents a significant and over-burdening threat to the village of Cosby where only 1,465 properties currently exist.

Traffic from neighbouring settlements has increased notably over recent years with Cosby being used as a route to and from the neighbouring settlements on a village roads network that regularly experiences congestion and grid-lock.

The potential of the Principle Urban Area (PUA) to encompass Whetstone, with Whetstone being an immediately conjoined settlement is of serious concern with Cambridge Road already a busy and interlinking road.

With Cosby's immediate proximity to Harborough District Council's area, consideration should also be given to plans, developments and land allocations within the neighbouring district planning authority. Joined-up thinking across the wider Housing and Economic Market Area (HMA / EMA) must be adopted.

It is recognised that Cosby is not immune from housing and population growth but any growth must be proportionate, respectful and in consideration of the relatively small, rural village nature with a conservation area, that Cosby is. The extant planning permission on Cambridge Road, if brought forward will increase the housing levels in Cosby by over 10% (12.3%) on its own and by (14.47%) if the recently delivered 32 dwelling Rural Exception Site is included.

Cosby has no health facilities, limited primary school education capacity, very limited employment opportunities, limited public transport and the only available land for development would be on Open Countryside and contrary to current local Planning Policy.

Large-scale developments within Cosby would not be considered as sustainable given the lack of facilities and services within Cosby, again contrary to local planning policy.

Acknowledging the Duty to Cooperate and Statement of Common Ground, it is not accepted that Cosby as a rural village should accept any of the Leicester City Council's un-met need. The economy and retail landscape in the higher order retail centre (Leicester City) in a post-pandemic world, will release considerable retail and commercial property within the city boundary.

Additionally, the suggested post 2031, 900 homes PA to be delivered by Blaby District Council is wholly unrealistic. It would require a "New Lubbethorpe" to be delivered every five years, would decimate the open countryside within the southern boundaries of the Blaby District area and should be resisted at all times.

As Permitted Development Rights support the redevelopment of redundant retail and commercial property into residential dwellings, it is not accepted that the City Council cannot now meet its own; previously stated, un-met need in a post-pandemic society. This reconsideration of built environment use would also comply with the highest level of land considerations within the NPPF – "Land that has had a previous use" which should come forward first whilst also being far more sustainable than developing on open countryside.

The Leicestershire Housing and Economic Development Needs Assessment (HEDNA) (2017) is now woefully out of date following the Covid-19 pandemic and along with the Strategic Growth Plan 2018 (SGP) which also included the now defunct A46 Expressway, needs to be fundamentally revised to reflect the post-pandemic economy and societal needs within the HMA / EMA.

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

In principle yes, with the exception of the unacceptable housing targets above but the how, what, why, when and where needs refreshing and clarity.

The 2022 and onwards post-pandemic society and economy that the Local Plan seeks to service is currently based on pre-pandemic assessments and society will function very differently to the pre-pandemic era.

There is likely to be a fundamental “shift” in societal behaviour, property needs and property availability and expectations; and the new Local Plan needs to be relevant to the new future and based on post-pandemic evidence. Developing housing and employment development and delivery on pre-pandemic data, risks building the wrong things in the wrong places at the wrong time to deliver the wrong outcomes.

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?

No Local Plan can control employee movement and the crossing of local boundaries for work. It is however recognized that successful and sustainable settlements are reliant on a vibrant and progressive local economy and attracting investment and employment, this should not though be unconstrained growth.

The fact that the Blaby District area is at the crossroads of the UK, M1, M69, A5, A6, A46 and with the M6 and A14 a few miles away, it is likely that employees and businesses will migrate across local authority boundaries by default.

In a post-pandemic economy, the city of Leicester is likely to have considerable levels of vacant commercial premises within its own boundaries, the city of Leicester is also the Higher Order Retail Centre and will require substantial re-mapping, development and recovery so encouraging workers out of the city for employment is counter-intuitive.

Accepting the migratory behaviour of employees across boundaries and the need to stimulate local economies, the need or willingness to provide employment land for city-based workers is not evidenced and the pre-pandemic HEDNA needs to be fully re-evaluated.

The apparent support for large-scale logistics sites within the local area is not welcomed, there is significant risk to the village of Cosby and the local roads network with the potential logistics park and motorway junction (20a) on Cosby’s curtilage boundary.

Magna Park, Lutterworth is established and expanding. The Strategic Rail Freight Interchange at East Midlands Airport is underway, the potential Strategic Rail Freight Terminal off the M69, the East Midlands Parkway with its potential link to HS2 along with increasing logistics space within the Hinckley / A5 corridor all seem to challenge the need to provide a logistics park within the Blaby District area or provide employment opportunities in the logistics sector.

The 24-hour operating and bland landscape nature of logistics parks strongly suggests that they are not suitable or appropriate to be located adjacent to a small rural village where public transport is negligible and employees will inherently need to travel by car.

Q3. Do you agree with the proposed Settlement Hierarchy?

Broadly yes, however the expansion of the PUA to include Blaby and Whetstone in particular but including Countesthorpe represent significant threats to Cosby when considering traffic, infrastructure and the road network. Any housing and employment assessment of Cosby need to be sensitive and proportionate to the existing village size, infrastructure, services and land availability which can only be Open Countryside.

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

In principle yes as this is the greatest opportunity to deliver large-scale sustainable growth, deliver the necessary infrastructure and minimise the impact on our existing settlements.

Strategic sites and the principle of Garden Villages is broadly supported but the original Whetstone Pastures Garden Village vision never mentioned a logistics park or motorway junction (20a) and this seems to be very much “developer” driven rather than planning policy driven. The promoters of Whetstone Pastures (Tritax Symentry) are well-known “shed” developers and have no obvious interest or track record in residential and non-logistics development.

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?

In the short-term this seems to be inevitable but the size, scale and impact on the existing settlements and the inherent lack of services such as health, needs to be fully recognized, proportional and wholly mitigated.

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)?

This is a difficult outcome for a planning authority to achieve. There is already in place Permission in Principle for small scale developments and land allocations primarily designed to encourage and support small residential house builders.

Most development land is promoted by land-owners, promoters or developers. As such, the ambition can only be by land-owners in particular, being prepared to release small parcels of land, that will often not be in their commercial interest.

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 house-builders or self builders to enter the housing market?

Cosby Parish Council has no land to release

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

20-minute neighbourhood’s is the new buzz-word but is based on logical policy and aspiration that has been around for over a decade, AKA City Living.

Good design, social integration and cohesion are essential, whether for small-scale urban expansion or large-scale strategic sites. Beauty is though in the eye of the beholder but the commitment to climate change and green infrastructure is welcomed.

Overall, the approach to urban design quality and place-making is logical but large-scale strategic sites are best place to deliver these collective design principles where they can be designed from concept up rather than bolting-on to established settlements where street-scene, local character, infrastructure, sustainability and services need to be taken into consideration and may already be limited.

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

Environmental and climate change policies for the built environment need to be enshrined in and enforceable through Planning Law to be wholly effective. Evidence indicates that Central Government is heading in this direction but developers also need to commit to developing carbon neutral or carbon negative developments.

The District Councils approach is logical and laudable but reliant on planning law, local planning policy and third-party commitment.

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

Mitigating localized and down-stream flood risk mitigation is essential

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

Biodiversity and geodiversity should be fully integrated into and a cross-cutting core theme within the Local Plan.

The approach is supported but recognizes that national policy is also critical to this policy

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

Agreed.

Both listed and non-listed heritage assets should be afforded equal protection. Ancient and historic farmland should be expanded to include hedges and woodland which feeds into both geo and bio-diversity.

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

Agreed

Any policy that improves the environment and minimises or alleviates land contamination is welcomed

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

“A healthy community” is a far-reaching principle. The proposed polices set-out at 7.1.2 provide for a sound and logical base-line but should not limit wider opportunities.

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

The distance between residential property and the nearest health centre (GP Surgery) should be a critical part of planning policy. Requiring elderly, infirm, young children to walk over a

mile to a GP surgery is unrealistic and only encourages travel by car, contrary to the plans stated environmental and sustainable ambitions.

The principle of a 20-minute neighbourhood is sound but needs to cover the breadth of society and be very future-focused by making provision for an ageing society. Health provision should be at the forefront of place-making and planning policy.

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

Building on open countryside, which by default is the only place where significant housing can be delivered in South Leicestershire, is in direct conflict with the ambition to protect open countryside and green infrastructure.

There is insufficient detail within section 7.2 to be able comment outside of a need to develop, maintain and integrate “green inter-connectivity” (green lung) across the HMA / EMA and for all new developments to have a minimum “green space provision” criteria.

Larger open spaces in preference to small pepper-pot spaces are more flexible, usable and preferable.

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

The approach is agreed. The broader community approach is sensible and will probably support the provision of higher quality activities and equipment, an effective “pooling” mechanism but to be truly successful, it does rely on the inter-connectivity of settlements.

Open space, sport and recreation should also take into consideration the provision of physical assets such as village halls, changing rooms etc.

There is not enough evidence within section 7.3 to comment further.

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

Cosby Parish Council is currently sponsoring the development of a Neighbourhood Plan with designated “green space”

The single largest and dominant Green Space within Cosby is held in perpetuity within a charity. It is not then a Public Open Space in the general principle and these variations on themes of ownership should be captured within the Green Space strategy and policy.

The challenge will be the requirement of a Neighbourhood Plan to align with the Local Development Plan where the latter over-rides the former and local people may see unwelcome development within their settlements.

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

Agreed in principle. Priority should be given to people with local connections as embedded within the principles of Rural Exception Sites for all Affordable Housing.

The need to provide for a pre-pandemic unmet need from the City is not accepted without post-pandemic analysis.

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

Agreed in principle.

Good to see the commitment to an updated HEDNA and supports a post-pandemic un-met need assessment prior to any commitment to housing numbers and mix.

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

Agreed. The need to provide a mix of housing within an overall cradle to grave provision is a progressive policy.

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

Sensible approach, however, the potential impact on existing built settlements needs to be better understood, accommodated and mitigated, as does balancing the health and welfare opportunities for the Gypsy and Traveller community with their preferred lifestyle choices.

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

In addition to the “Strategic Warehousing and Logistics Study” there needs to be a post-pandemic needs assessment of Nano, micro, SME businesses and the skills and economic stimulus that these businesses would bring and the likely new societal-economy will require.

Conversion and remodelling of existing / redundant / tired employment space including farm out-buildings (mini-parks)

Releasing open countryside for employment should be primarily limited to Garden Village principles where small and flexible business space is inherent within the design principle.

The need for a logistics park on the outer curtilage of Cosby (J20a) is not accepted with major logistics sites within a few miles or in the pipeline.

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

Releasing open countryside for employment should be primarily limited to Garden Village principles where small business space is inherent within the design.

There is a potential site on Cambridge Road with extant residential planning permission and a number of farms within the parish curtilage that may be able to diversify and support mini-parks.

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

The Local Plan should be explicit in its ambition and identify and encourage the development of smaller sites, innovative businesses and new technologies.

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

Broadly agreed but post-pandemic evidence is required in order to develop a fit-for-the-future set of policies.

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

When a location is included in the tourism plan, there should be an assessment of the impact on the settlement being promoted.

The Tithe Barn in Cosby is a notable example. There is limited off-street parking at the Tithe Barn and Main Street is narrow and congested with on-street parking exacerbating what is already a problematic issue.

Expanding the visitor economy is otherwise generally supported.

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

The proposal flies in the face of the District Authorities potential support for M1 junction 20a and a logistics park.

The societal-economy is fundamentally shifting to local and hyper-local and an up-to-date evidence (Post-pandemic) base is required to formulate a sustainable, environmentally conscious transport infrastructure.

There is a clear trend towards home / remote-working, hybrid working and many businesses already committed to not returning to the pre-pandemic behaviour of everyone going to a place of work. There is no evidence within the current proposals that these fundamental shifts in work-patterns-lifestyles have been assessed and that policy is being based on up to date evidence and sound future-thinking.

Transport policy needs to be based on an agile economy where the major employment growth will be within the micro-SME business community which will mostly be within a 20-minute neighbourhood.

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

Without an up-to-date evidence base there is little evidence to consider.

In principle though, the traffic and transport infrastructure and policies should seek to alleviate hot-spots, cut-throughs and encourage walk-ride.

Cosby has seen considerable increases in vehicle movements with weight limits regularly ignored and road congestion over the last 10 years as more and more development has taken place in surrounding and neighbouring settlements. There has though been no corresponding improvements in traffic management.

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

The approach is sensible and the Infrastructure Delivery Plan (IDP) will be interesting to assess.

A cross-border approach is logical and joined-up thinking between planning authorities will be essential to good provision.

The infrastructure assessment should reach into the first analysis of a development and capture Construction Management Travel Plans. It is farcical for a travel plan to steer construction traffic through a small village to access developments in a neighbouring planning authority area when far superior main arterial route access is available.

Recognising the planned viability assessments, many of the policies being proposed require long-term third-party and developer commitment and without that evidence base, the policy approach is sensible but has no guarantee of deliverability.

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

Health, public transport and the post-pandemic economy

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

Environmental standards, commitment to a carbon neutral economy, mixed housing.

On behalf of Cosby Parish Council

Les Phillimore
Parish Manager