

Matter 4 - Housing

Panel Recommendations				Structure Plan Authorities' Response
<p>4.80 That Housing Policy 1 be amended as follows:</p> <p>HOUSING POLICY 1: THE QUANTITY OF HOUSING LAND</p> <p>Provision will be made for 64,750 dwellings within the Plan Area of which 35,450 shall be located in the Central Leicestershire Policy Area. Provision by district and unitary authority areas including elements for the Central Leicestershire Policy Area will be as follows:</p>				<p>Accept recommendations for the reasons given in the Panel Report in relation to:</p> <ul style="list-style-type: none"> referring to “provision will be made for...”, in the policy preamble (paragraph 4.63) the allocation of dwellings to Leicester (paragraph 4.49) the removal of the column headed “Smaller Greenfield Sites” (paragraph 4.59) <p>subject to:</p> <ul style="list-style-type: none"> not accepting the recommendations relating to the Plan-area total, the proportion allocated to the Central Leicestershire Policy Area and the allocations to districts.
Local Authority Area.	Central Leics.	Rest of Plan Area	Total	<p><u>Plan Area Total</u></p> <p>A total of 63,000 dwellings is consistent with RPG 8 which proposes an annual rate of provision of 3,150 dwellings, 50 per annum less than in the Secretary of State's draft RPG. Whilst RPG 8 covers a different 20 year period (2001-21), it is considered that it would be appropriate to apply the annual RPG 8 figure to the Structure Plan period, particularly as such an approach was supported, by GOEM, at the Examination in Public.</p>
Blaby	5,100	300	5,400	
Charnwood	4,100	6,200	10,300	
Harborough	3,500	4,650	8,150	
Hinckley & Bosworth	1,350	5,550	6,900	
Leicester	19,000	-	19,000	
Melton	-	3,200	3,200	
North West Leics.	-	7,050	7,050	
Oadby & Wigston	2,400	-	2,400	
Rutland	-	2,350	2,350	
Total Plan Area	35,450	29,300	64,750	
				<p><u>Central Leicestershire Policy Area</u></p> <p>The focus on the CLPA proposed by the Panel report is not acceptable for several reasons. Firstly there has been significant under-achievement in relation to the 55% target in the first five years</p>

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	<p>of the Plan period. Secondly the target could only be achieved if substantial amounts of additional greenfield land were to be released for housing within the CLPA. Such releases would undermine attempts to significantly maximise urban capacity and increase housing provision within Leicester. It is considered that the Panel's recommendation that housing provision in Leicester be increased to 19,000 dwellings is incompatible with significant increases in housing provision within the rest of the CLPA outside Leicester. A distribution of dwellings within and outside the CLPA similar to that proposed at the EIP is therefore considered to be appropriate.</p> <p><u>Distribution to Districts</u> The distribution to districts proposed by the Panel does not take into account the updated supply information provided by the districts. And the adjusted urban capacity assessment (see discussion relating to Housing Policy 2 below) It is considered that a distribution based on the updated supply, and the distribution of Strategic Greenfield Sites, as set out in the proposed Housing Policy 2, is the most appropriate approach to distribution.</p>
<p>4.81 That the explanatory memorandum to Housing Policy 1 be amended as follows: (i) by inclusion of reference to the need for a review of local plan housing allocations; (ii) by changes to Table 6.1 so as to distinguish between housing completions/commitments (land with planning permission) and local plan allocations.</p>	<p>Accept recommendations for the reasons given in the Panel Report (paragraphs 4.19 to 4.26).</p> <p>These changes to the Explanatory Memorandum were suggested at the EIP by the Structure Plan authorities. PPG 3 makes it clear that in preparing local plans, districts should review housing allocations without planning permission to ensure they remain consistent with the national, regional and strategic planning frameworks. The recommended changes to Table 6.1 would make clear the amount</p>

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	of housing provision which might be affected by such reviews.
<p>4.82 That Housing Policies 2 and 3 relating to the allocation and phasing of greenfield land should be deleted.</p>	<p>Do not accept the recommendation.</p> <p>It is considered that a policy on the lines of the simplified Housing Policy 2 proposed in the Supplementary Housing Report provides an appropriate level of strategic guidance. This includes the principles relating to phasing that were originally set out in Housing Policy 3.</p> <p>It is important that the Plan is able to specify how much greenfield land should be released, the broad distribution of this provision, and its timing. This will ensure that strategic support is provided for the Plan's objective to maximise urban capacity, supporting Leicester's challenging housing provision target and avoiding the unnecessary release and development of greenfield sites. It will ensure the greenfield development identified in the proposed modification to Strategy Policy 4 is subjected to a maximum land area, is not developed until the last five years of the Plan period and is distributed between the CLPA and the rest of the Plan area.</p> <p>In deriving the distribution of residual greenfield land requirement, information on housing land supply has been updated to a base date of April 2001. In addition the urban capacity assessment has been adjusted.</p> <p>It is assumed that housing land supply in Leicester will total 19,000 dwellings, in line with the Panel's recommendations. This is a more challenging rate of provision than that suggested by existing housing land supply information, and relies on significantly greater amounts of urban capacity coming forward than found in the April</p>

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	<p>2000 urban capacity assessment.</p> <p>Taken together these indicate a supply of about 59,750 dwellings in the Plan area up to 2016.</p> <p>In addition, it is considered that the urban capacity assessment might be an underestimate, for the following reasons:</p> <ul style="list-style-type: none"> • The Government is placing increasing emphasis on the importance of maximising urban capacity, reflected in the Planning Green Paper and the Greenfield Land Direction; • RPG 8 includes a revised Policy 1 (Locational Priorities for Development) which places greater emphasis on finding suitable sites (whether previously developed or not) within urban areas. This greater emphasis is reflected in the Proposed Modification to Strategy Policy 3A. This strengthening of Government policy on urban capacity could mean more housing land being brought forward in urban areas in the future than might have been previously estimated; • The Panel noted that the urban capacity assessment 'may be regarded as taking a somewhat conservative approach to assessing future potential', pointing out a number of areas where future capacity may have been underestimated. In particular, the Panel recommended that the provision of housing within Leicester should be increased from 16,200 to 19,000; • Melton BC carried out a detailed urban capacity study in early 2001 which found about 10% more capacity than had been identified in the Structure Plan assessment; • There is evidence from recent research that urban capacity

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	<p>assessments and studies may have underestimated urban capacity. A recent report by Business Strategies/ GVA Grimley (A Deepening Mismatch, 2002) argues that there will be a potential oversupply of urban manufacturing land over the next five years, and that this land is well placed to meet increasing demand for residential land;</p> <ul style="list-style-type: none"> • There are indications that some districts are witnessing urban housing sites coming forward more quickly that was previously anticipated. <p>In the light of these strengthening policy pressures, evidence of increased supply of urban land and concerns that the urban capacity assessment was 'conservative', it is considered appropriate to increase the urban capacity assessment by 5%, well within increase suggested by the Melton study. It is applied to all districts except Leicester, where a higher figure of 19,000 is already proposed, and Melton, where the urban capacity study findings are already built into the supply figures. This results in the urban capacity assessment increasing by about 550 dwellings.</p> <p>The total supply of housing land is consequently estimated at about 60,300 dwellings, leaving a shortfall of 2,700 to be met on greenfield sites of which 2,000 is proposed on Strategic Greenfield Housing Sites. In accordance with the Proposed Modification to Strategy Policy 4, it is anticipated that these sites should generally be identified as urban extensions and allocated for development in local plans.</p> <p>It is proposed that the distribution of the Strategic Greenfield Housing Sites should be broadly similar to that proposed at the</p>

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<p>(4.82 continued)and a new policy introduced into the Structure Plan setting a target of 60% by 2008 for the proportion of new housing provision on previously developed land and existing buildings. This should be accompanied by provisional indicative targets for each district in the explanatory memorandum.</p>	<p>EIP, with the increases distributed to ensure a minimum size of 250 dwellings, addressing the criticism that some sites were too small to be strategic.</p> <p>A further change is that, to be consistent with the Panel's recommendation regarding density in Housing Policy 5, a mean density of 40 dwellings per hectare is used to calculate the land take of Strategic Greenfield Housing Sites, compared with 35 dwellings per hectare proposed at the EIP.</p> <p>Accept recommendation for the reasons given in the Panel Report (paragraphs 4.42 to 4.43) subject to:</p> <ul style="list-style-type: none"> • setting a target of 50% during the plan period • utilising a form of wording that is consistent with RPG 8. <p>RPG 8 requires a target of 60% of additional dwellings on previously developed land and through conversions by 2021, and development plans to put in place policies to achieve appropriate targets for higher levels of re-use of previously developed land than in the past. However, RPG 8 gives a target for the region as a whole, not for constituent structure plan areas. If this principle is followed it is considered inappropriate to provide targets for each district as recommended by the Panel. Current estimates for the Plan area indicate that about 47% of the housing provision could be on previously developed land or found through conversions. In the light of this, it is considered that that the policy should set an achievable and realistic target of 50% and the wording should be consistent with the RPG 8 and relate to the Structure Plan period.</p>
<p>4.83 That Housing Policy 4 be amended as follows:</p>	<p>Accept recommendations for the reasons given in the Panel Report</p>

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<p><i>HOUSING POLICY 4: AFFORDABLE HOUSING.</i></p> <p><i>Provision will be made in local plans for affordable housing for households unable to purchase or rent adequate housing on the open market, to a level identified as a result of local needs surveys and assessments. Policies and proposals to provide for the identified need will be designed to reflect variations in local circumstances in both urban and rural areas, using the full range of measures available, including:</i></p> <ul style="list-style-type: none"> <i>- Specifying the proportion of affordable housing to be sought in housing developments of 25 or more dwellings, or residential sites of 1.0 hectares or more;</i> <i>- Identifying rural settlements of 3,000 population or fewer where different site thresholds may apply; and</i> <i>- Specifying the circumstances in which rural 'exceptions' policies will apply.</i> 	<p>(paragraphs 4.66 to 4.74) subject to the exclusion of reference to detailed measures.</p> <p>The suggested detailed measures are considered to be too prescriptive for a Structure Plan policy and could prove inflexible for local planning authorities when preparing local plan policies for affordable housing. Current Government guidance in Circular 6/98 does allow for a lower site threshold (15 dwellings/0.5ha) provided that this can be justified by local needs assessments. These detailed measures should be restricted to a reference within the Explanatory Memorandum.</p>
<p>4.84 That the explanatory memorandum to Housing Policy 4 should contain an indicative target for affordable housing for the Plan area, for monitoring purposes. Pending further information on the absolute level of affordable housing required, this should be expressed as a broad proportion (30%) of the additional housing provision over the plan period. The explanatory memorandum should also refer to national and regional guidance on affordable housing and highlight the special problems facing low income</p>	<p>Accept the recommendations for the reasons given in the Panel Report (paragraphs 4.70 to 4.74)</p>

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households in rural areas.	
<p>4.85 That Housing Policy 5 be amended as follows:</p> <p><i>HOUSING POLICY 5: DENSITY AND DESIGN</i></p> <p><i>Housing Development should be of a type and design to achieve as high a net density as possible, taking account of:</i></p> <p><i>(a) proximity and accessibility to centres;</i></p> <p><i>(b) the provision of a mix of housing types to establish socially mixed communities;</i></p> <p><i>(c) good principles of design and layout which make the most economical use of land and respect the local context;</i></p> <p><i>(d) green space and landscaping requirements.</i></p> <p><i>Subject to the considerations set out above, housing developments on sites of 0.3 hectares or more should attain the following net densities:</i></p>	<p>Accept the recommendations for the reason given in the Panel Report (paragraphs 4.75 to 4.79).</p>
<p><i>Within and adjoining the centres of Leicester and Loughborough</i></p>	<p><i>A minimum of 50 dwellings per hectare</i></p>
<p><i>Within other main town centres, local centres and other locations well served by public transport and accessible to services and facilities</i></p>	<p><i>A minimum of 40 dwellings per hectare</i></p>
<p><i>Other locations</i></p>	<p><i>A minimum of 30 dwellings per hectare</i></p>

Decisions and Reasons

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4.86 That the explanatory memorandum to Housing Policy 5 should make it clear that the net densities in the above table should be calculated by reference to the guidance in Annex C of PPG3.	Accept the recommendations for the reason given in the Panel Report (paragraph 4.79)