

Policy No.**Housing Policy 1: The Quantity of Housing Land****Summary of Issues**

1. The total quantity of housing should be as recommended by the EIP Panel. This involved the provision of 64,750 dwellings between 1996 and 2016, based on the annual rate of provision of 3,200 for 2001-2016 proposed in Draft RPG, and an estimate of actual completions between 1996 and 2001. [Subsequently the final RPG included an average annual provision rate of 3,150 dwellings.]
 2. Housing provision should be expressed as an annual rate, not a total.
 3. The Central Leicestershire Policy Area should include 55% of the total housing allocation as recommended by the EIP Panel.
 4. A specific allocation to the Central Leicestershire Policy Area will deny districts the opportunity to consider the most sustainable settlement pattern.
 5. The urban capacity figures could be exaggerated and do not form a sound basis for calculating the housing distribution.
 6. The proposed distribution of housing should have a policy basis to ensure that local housing need takes account of the “policy neutral” requirement and is met in the most sustainable locations, irrespective of existing local plan allocations without planning consent.
 7. Objections to district housing distributions and alternatives suggested (including the distribution recommended by the EIP Panel). Specifically:
 - Blaby: too high;
 - Blaby too low;
 - Charnwood: too low;
 - Harborough: too low;
 - Hinckley and Bosworth, too low in the Central Leicestershire Policy Area;
 - Allocation to Leicester is too optimistic, and should be lower, with the surplus allocated to the remainder of the Central Leicestershire Policy Area;
 - Melton: too high / should be reduced to 3,000 dwellings (including 36 objections from individuals);
 - North West Leicestershire: too high;
 - Oadby and Wigston too high (including 10 objections from individuals);
 - Oadby and Wigston too low;
 8. Objection to content of Housing Technical Paper;
- Nine Representations of Support

Reasoned Response

1. Not accepted. The EIP Panel’s recommendation that 64,750 dwellings be provided within the Plan area between 1996 and 2016 is not considered appropriate for the

following reasons:

- The final RPG proposed an annual average rate of 3,150 dwellings between 2001 and 2016. The actual number of dwelling completions between 1996 and 2001 was 16,635. Using the methodology used by the EIP Panel the equivalent housing provision figure for 1996 to 2016 would be 63,885.
- However, the Structure Plan Authorities do not consider that the EIP Panel's methodology to be appropriate. This is because it failed to recognise that the technical basis used by the EMRLGA's Planning Forum for calculating the draft RPG8 annual average rate used a base date of 1996. When the start date of the final RPG was rolled forward to 2001 by the Secretary of State no detailed technical information was provided to explain or justify the (relatively minor) change to the annual average rate. It is therefore considered that the technical work carried out by the EMRLGA's Planning Forum to underpin the proposals in draft RPG remains valid. (The minor change to the annual average rate from 3,200 to 3,150 dwellings was justified by reference to adjustments to assumed vacancy rates). In this context it is appropriate to assume that the annual average rate applies to the period from 1996 to 2016 and not just to the period of RPG from 2001. Therefore the annual average rate should be 3,150 dwellings, which equates to 63,000 dwellings over the Structure Plan period 1996 to 2016.
- Housing provision in the first five years of the Plan period (16,635 – that is 3,327 dwellings per annum) has exceeded the annual average rate of 3,150 by 177, a total of 885 dwellings. The EIP Panel considered that this should be added to the housing requirement for the period between 2001 and 2016. It is the view of the Structure Plan authorities that doing this would lead to an over-provision of dwellings in the Plan area as the technical requirement for dwellings between 1996 and 2001 was 3,150 per annum. Any provision over and above this should be offset against provision in the period after 2001, in line with the principles of 'plan, monitor and manage'.

A total housing provision of 63,000 for the Plan period therefore provides a robust housing provision target, consistent with RPG8.

A number of other objectors suggested other housing provision totals, based on the methodology recommended by the EIP Panel, including that the figure should be 64,000 dwellings. For the reasons explained above it is considered that the figure which best reflects the requirement for dwellings set out in RPG8 is 63,000 dwellings.

2. Not accepted. There is no requirement for the provision to be expressed as an annual rate. PPG12 requires structure plans to indicate the scale of provision to be made, including figures for housing in each district. At the Structure Plan level, totals for the whole period are more appropriate for translation to district level provision.
3. Not accepted. The deposit draft Explanatory Memorandum refers in para 2.6 to the aim of locating 55% of new development in the Central Leicestershire Policy Area (CLPA). At the EIP, it was made clear that this was an aspirational target. It would also be unrealistic to apply the target to the total amount of development over the Plan period. This is because the Plan's strategy for distribution has been unable to influence

the distribution to date so only 42% of development in the first five years of the Plan period has been achieved in the CLPA. However, the distribution as set out in the Modifications would result in 53% of new development from 2001 being located in the CLPA over the remainder of the Plan period, close to the 55% target. This proposed distribution will also increase the quantity of housing in the CLPA over the whole Plan period from 28,025 (47% of the total) in the Supplementary Housing Report to 31,500 (50% of the total) in the Proposed Modifications. The EIP Panel recommendation that 19,000 dwellings should be allocated to Leicester could not be achieved if there were to be significant increases in housing provision in the rest of the CLPA outside Leicester. The dwelling provision recommended for the CLPA outside Leicester by the EIP Panel is therefore not accepted. Because of the significant under-achievement in relation to the 55% target for the CLPA in the first five years of the Plan period, the target could only be achieved if substantial amounts of additional greenfield land were to be released for housing within the CLPA outside Leicester. Such releases would undermine attempts to significantly maximise urban capacity and increase housing provision within Leicester.

4. Not accepted. Splitting the housing provision between inside and beyond the Central Leicestershire Policy Area (CLPA) has formed a central component of the overall strategy in the Plan from an early stage, reflected in the new proposed Strategy Policy 2. At the strategic level this will facilitate the most sustainable pattern of development, by helping to achieve the aspirational target of 55% of new development in the CLPA. It is entirely appropriate that the Plan should set this strategic context, within which districts can consider a sustainable distribution of development at the local level.
5. Not accepted. It is not considered that the urban capacity figures are exaggerated. The EIP Panel itself concluded in para 4.37 of their report that “*the urban capacity study may be regarded as taking a somewhat conservative approach to assessing future potential*”. This and the other factors set out in the Technical Paper accompanying the Proposed Modifications form the basis of the modest increase in urban capacity incorporated into the supply of housing used to derive the district distribution. Response 7 (below) refers to the recent increase in uptake of previously developed land for housing in Leicester. Early indications are that this is being repeated throughout the Plan area, with large site completions on previously developed land rising from 45% (1996 – 2001) to 47% (2001 – 2002). It is appropriate to take the likely contribution from urban capacity into account in calculating the housing distribution. This allows the Structure Planning Authorities to make strategic decisions regarding the broad distribution of new greenfield development in the Plan area. This can only be done if both the supply and proposed strategic greenfield development are incorporated in the distribution figures. (See also responses to Housing Policy 2).
6. Not accepted. The locational strategy of the Plan as set out in Strategy Policy 3A gives the same priority to the main towns as the Leicester and Leicestershire Urban Area. The overall quantity of housing provision to districts reflects this priority, as well as the following factors:
 - Achieving an amount of development in the Central Leicestershire Policy Area (CLPA) that would not result in an excessive amount of greenfield provision in the CLPA outside Leicester;
 - The aim of balancing housing and employment in Central Leicestershire,

districts and more specific locations;

- The level of existing commitments (land with planning permission or allocated in a local plan) and the expected contribution from additional urban capacity;
- The desirability of achieving comprehensively planned strategic greenfield sites which will allow public transport, infrastructure and other facilities to be provided in a managed way;
- Potential locations of strategic greenfield sites capable of development beyond the Plan period;
- The desirability of including an element of smaller greenfield development to meet local needs, for example, for affordable housing.

The “policy neutral” distribution gives a very broad indication of the projected housing requirement on a district basis. Because it reflects past trends, it would not be appropriate to use as a policy basis for a revised distribution. It cannot, for example help with the distribution within and outside the CLPA, and therefore cannot help to ensure the main towns are given the priority required by the sequential approach.

In Charnwood, Harborough, Hinckley and Bosworth and Oadby and Wigston, the factors listed above require the allocation of additional greenfield land on Strategic Greenfield Housing Sites, as set out in Housing Policy 2. In Blaby, Melton and North West Leicestershire, the supply of land available will ensure that no further greenfield land will be required beyond that needed for smaller greenfield development to meet local needs.

The Strategic Planning Authorities do not consider that the proposed distribution of dwellings across the Plan area has been inappropriately influenced by the inclusion of local plan allocations without planning permission as commitments. This was a view supported by the EIP Panel which stated that individual allocated sites should be reviewed through the local plan process. The matter was covered in the EIP Panel’s Report at paragraphs 4.19 to 4.26 which concluded in paragraph 4.26 that *“Our overall conclusion is that whilst we cannot subscribe to the approach on commitments adopted in the Structure Plan, we have no firm evidence that this has so distorted the allocation of dwellings across the Plan area as to fundamentally undermine the achievement of the Plan’s strategy. However, we do feel that local plan allocations which are judged not fully compatible with the strategy should be reviewed as the local plans are updated and rolled forward. The Structure Plan Authorities agreed to include reference to the need for such reviews in the explanatory memorandum to Housing Policy 1. It was also agreed that Table 6.1 in the explanatory memorandum, which summarises housing provision by local authority area, should be amended so as to distinguish between true housing commitments, namely completions and sites with planning permission, and local plan allocations.”* Clarification regarding those sites allocated in local plans which the EIP Panel described as being ‘not fully compatible with the Strategy’ was provided in Technical Paper 1, accompanying the Proposed Modifications.

7. Not accepted. The distribution to districts proposed by the EIP Panel does not take into account the supply information provided by the districts updated to 2001 and the adjusted urban capacity assessment (see response to Issue 5, above and the Housing Technical Paper, issued with the Proposed Modifications). On a district basis, the proposed distribution is based on the updated supply, and the distribution of Strategic

Greenfield Sites, as set out in the proposed Housing Policy 2.

Generally, the proposed distribution differs from that recommended by the EIP Panel by reducing the amount of new greenfield housing land in the CLPA outside Leicester, thus helping to promote regeneration in Leicester, with the objective of meeting the ambitious allocation in Leicester. (see the response to Strategy Policy 2). The EIP Panel's recommended housing distribution would seriously undermine the prospects of realising this ambitious allocation. Outside the CLPA, the proposed distribution gives a more appropriate emphasis to the main towns in accordance with the sequential approach. It would be inappropriate to transfer housing provision from Melton and North West Leicestershire to the parts of other districts outside the CLPA because it would entail excessive amounts of new greenfield housing land having to be allocated in those districts. The district descriptions below refer to the supply as set out in Table 5, and the distribution of new greenfield housing set out in Table 8 of the Technical Paper.

- **Blaby**

The provision recommended by the EIP Panel would imply new greenfield development of about 900 dwellings, taking into account the supply of 4,457 dwellings, most of which is located in the Central Leicestershire Policy Area (CLPA). Although Blaby has the longest urban "edge" with Leicester of all the districts, any urban extension here would have to be on a large scale to be viable. This scale is unnecessary, given the reduced need for new greenfield housing land over the Plan area and undesirable given the policy objective of minimising the amount of new greenfield development in the CLPA outside Leicester. Nevertheless, the allocation incorporates a larger element of Smaller Greenfield Sites which reflects the lack of a main town in Blaby and the district council's objection that greater flexibility is required.

- **Charnwood**

In the context of the updated supply information (8,701 dwellings, 70% of which is outside the CLPA), the provision recommended by the EIP Panel would imply new greenfield development of about 1,400 dwellings, in the CLPA and almost nothing outside. This would involve large allocations of new greenfield development close to Leicester, whilst not allowing for an adequate amount of housing to meet the needs of Shepshed and the major market town of Loughborough. The proposed distribution would allow for a more balanced approach, allowing for more modest urban extensions to both Leicester and Loughborough and Shepshed, whilst taking into account environmental constraints around Loughborough.

- **Harborough**

The provision recommended by the EIP Panel would allow for very little new housing outside the CLPA to meet the needs of Market Harborough and Lutterworth, taking into account the supply of 6,909 dwellings, two thirds of which is outside the CLPA. The proposed distribution would allow for a more balanced approach, allowing for more modest urban extensions to both Leicester and Market Harborough / Lutterworth. The supply includes greenfield allocations adjoining Market Harborough, Kibworth and Great Glen. The local planning authority is currently altering the adopted local plan to set in place a phasing mechanism to ensure that the

greenfield sites are not developed at the expense of available previously developed land.

- **Hinckley and Bosworth**

The total proposed Structure Plan provision is broadly in line with the EIP Panel's recommendation. However, as with Charnwood and Harborough, the EIP Panel's recommendation would allow for very little new housing to meet the needs of Hinckley and Earl Shilton, taking into account the supply of 6,441 dwellings, 85% of which is outside the CLPA. Although a small part of the borough lies within the CLPA, there are no main towns and none of it adjoins the Leicester and Leicestershire Urban Area. It is considered therefore that any urban extension in the borough should be located outside the CLPA to meet the needs of Hinckley and Earl Shilton. Development needs within the CLPA can be met from the more modest element of Smaller Greenfield Sites.

- **Leicester**

The EIP Panel recommended an increase in the City's allocation from 16,200 to 19,000 houses. They concluded in their report (para 4.49) that Leicester *"is the most sustainable location and that additional urban capacity over the Plan period is most likely to arise in the city through unidentified windfalls, urban intensification, residential sub-division and the like. The impact of government policy on urban renaissance and local measures for regeneration is also expected to have its greatest effect in major urban areas like Leicester"*.

The Structure Plan Authorities consider that the recently established Leicester Regeneration Company (LRC) will provide a new impetus to overcome obstacles to inner city redevelopment such as land assembly, site contamination and scheme viability. In November 2002 the LRC published its Masterplan, which outlines several major redevelopment schemes, including proposals for about 3,000 new homes within the City centre. The City Council has approved this strategic regeneration framework in principle.

The Masterplan has generated a great deal of interest from landowners and developers. Brownfield housing developments in the City should increase significantly with the implementation of the LRC Masterplan proposals over the next ten years. Evidence of schemes being built in the City centre and many more in the planning pipeline suggest this is already happening. Planning permission has already been granted (subject to a Section 106 agreement) for 475 houses on Bede Island South, with further planned phases which could eventually see up to 850 houses on this major brownfield site.

The City Council has agreed a moratorium on affordable housing requirements in certain areas within the City centre to help kick start private residential developments. The moratorium initially applied until 31st March 2003 but has been extended for a further six months until 30th September, pending some independent research into the impact and effectiveness of the moratorium.

In addition to these inner City regeneration sites the continued phased development on strategic greenfield sites at Hamilton and Ashton Green will make a major contribution towards the Structure Plan's housing allocation. The first phase of development at North Hamilton is well advanced and the City Council intends to market phase 1 of Ashton Green during 2003.

The Structure Plan Authorities firmly believe that the proposed housing distribution (Housing Policy 1) and phasing of new greenfield sites (Housing Policy 2) are essential planning measures to maximise urban capacity within Leicester. Any further increases in greenfield allocations in adjoining Districts within the CLPA will compete with these sites and make it more difficult for the City to meet its challenging housing target.

- **Melton**

Although Melton Borough falls entirely outside the CLPA, Melton Mowbray plays a major role as a market town for the surrounding area, and this is recognised in its designation as a main town in Strategy Policy 2. The borough has the most self-contained labour market in Leicestershire in terms of journey to work, with 54% of residents working within the borough. The proposed provision of 4,200 dwellings, (7% of the total housing provision) compares with the 125 ha employment provision (10% of the total). Any reduction in the housing provision would result in an imbalance of housing and employment in the borough, encouraging out-commuting. The total provision includes 50 dwellings for Smaller Greenfield Sites and the supply of 4,137 dwellings, the latter including the new village, an allocation in the adopted local plan which is required to meet the housing provision of the adopted Structure Plan. The rationale for including such commitments is set out in the response to Issue 6. The local planning authority will have an opportunity to review its commitments in detail, taking into account the latest guidance and the availability of previously developed land, when it come to review its local plan. It is considered that the proposed provision is sufficient to meet the policy objectives for the Plan without the need for any Strategic Greenfield Housing Sites to be provided under Housing Policy 2.

- **North West Leicestershire**

Although North West Leicestershire falls entirely outside the CLPA it contains the main towns of Coalville and Ashby de la Zouch which play important roles as main towns, reflected in their designation in Strategy Policy 2. Like Melton, the district is relatively self-contained in terms of journey to work, with 48% of residents working within the district. The proposed provision of 7,350 dwellings is a lower proportion of the total than the district's employment provision. Like Melton, any reduction in the housing provision would result in an imbalance of housing and employment in the borough, encouraging out-commuting. The total provision includes 50 dwellings for Smaller Greenfield Sites, and the supply of 7,315 dwellings. The latter includes an allocation at Grange Road, Hugglescote in the adopted local plan. The rationale for including such commitments is set out in the response to Issue 6. The local planning authority will have an opportunity to review its commitments in detail, taking into account the latest guidance and the availability of previously developed land, when it come to review its local plan. It is considered that the proposed provision is sufficient to meet the policy objectives for the Plan without the need for any Strategic Greenfield Housing Sites to be provided under Housing Policy 2.

- **Oadby and Wigston**

The EIP Panel's recommendation of 2,400 dwellings would imply new greenfield development of 1,300 dwellings. Whilst it is accepted that as well as falling entirely within the CLPA the borough performs well against the sequential test in Strategy Policies 3A and 3B, greenfield development on

that scale would have a serious impact on the already small amount of undeveloped land in the district, as well as competing with regeneration of previously developed land in Leicester. A smaller total provision of 1,700 is therefore proposed, which, taking into account the supply of 1,125 dwellings will require new greenfield development of 600 dwellings.

• **Conclusion**

The distribution of housing to the districts is consistent with the locational strategy of the Plan and takes account of the local circumstances in each district. It is a distribution which moves towards the aspirational target for the amount of new development in the CLPA whilst supporting the challenging housing total for Leicester.

8. Not accepted. This is not a valid objection as the Housing Technical Paper provides technical information to back up the Plan, and does not form part of the Proposed Modifications.

Proposed Policy Action

No change to Proposed Modification.

List of Respondents

Andrew Granger & Co, Blaby District Council, Burton and Dalby Parish Council, Cartfeild, J K, Cawrey Limited, Charnwood Borough Council, Clerk to Twyford and Thorpe Parish Council, Community Planning and Regional Services, CPRE (Regional Officer), D, J, Kent & Co, Chartered Accountants, David Wilson Estates, Derbyshire County Council, Fisher German, Friends of Ratby Action Group, Gaddesby Parish Council, Glenfield Parish Council, Goodwin, A P, Government Office for the East Midlands, Great Dalby Action Group, Harborough District Council, Hinckley and Bosworth Borough Council, House Builders Federation, J S Bloor (Measham) Ltd, John Littlejohn Ltd, Larkfleet Homes, Liberal Democrats- Oadby & Wigston Branch, Meadow Estate Resident Association, Melton Borough Council, Miller Homes East Midlands, Miller Homes East Midlands and Clowes Dev, North West Leicestershire District Council, Persimmon Homes (Midlands) Ltd, Redrow Homes, Revelan Group, Roger Tym & Partners, Soar Valley Protection Society, Somerby Parish Council, Town and Country Planning, Uppingham School, Westbury Homes, Wheatcroft and Son Ltd, Wigston Civic Society, William Davis Ltd.

J M Allsop, Dorothy Bacon, Robert Bowman, R and R Bridges, A Brooks, Phil Clarke, Mrs A Claxton, A and C Clayton, J Cowan, R Cowan, Dr H Daintith, A G Davies, A J Davies, Dr S K Dromgoole, M Duffin, Mr and Mrs, Duffin, R H Duffin, Tony Fox, Mr and Mrs Ghera, D Hemmings, Mr and Mrs Holdsworth, F and E Honan, Mr and Mrs Horspool, N Hudson, Chris Johnson, M Lepine, J M Luding, Bernard Ludwig, Ruth Mann, Mr and Mrs Milward, John and Linda Moore, Mr and Mrs Parkinson, Dr I Payne, M Pont, Didi Powles, W E Sharpe, Sally, Smart, J J Smith, Mrs E G Smith, T D W Smith, Thomas Smith, J and A Sparrow, Mr Tekhar,, Colonel D E Thornton, Samantha Warring, Mr and Mrs Whittle, P D Wilsher, E A Woodfield, K W Woodfield, Ms Young.

Policy No.

Housing Policy 2: Strategic Greenfield Housing Sites

Summary of Issues

1. Policy should be deleted:
 - It is unnecessarily detailed;
 - Objectives can be achieved through other policies in the Plan;
 - Removes flexibility of Local Planning Authorities to bring forward sites to meet strategic requirements through identification and phasing of sites;
 - Based on unsound premises, including arbitrary increase in urban capacity by 5%;
 - Without an improved monitoring framework, there is no effective basis on which the policy can be founded;
2. Objections to district housing distributions and alternatives suggested, including specifically:
 - Central Leicestershire Policy Area: too low;
 - Hinckley and Bosworth: too high;
 - Hinckley and Bosworth (Central Leicestershire Policy Area): too low;
 - Oadby and Wigston: too high (including 47 from individuals);
3. Allocations not of sufficient size to meet objectives of Strategy Policy 4.
4. Wording of policy could imply no limit in other districts.
5. The policy should include specific reference to local plan allocations at Kettleby Magna, Melton and Bardon Grange, North West Leicestershire.
6. The assumption of 40 dwellings per hectare for calculating land required is too high.

Seven Representations of Support

Reasoned Response

1. Not accepted.
 - The policy provides an appropriate degree of strategic guidance and detail by specifying how much greenfield land should be released, its broad distribution and timing. It will ensure that the greenfield development identified in Strategy Policy 4 is subjected to a maximum land area, distributed within districts between the Central Leicestershire Policy Area and the rest of the Plan area, and is not developed until the last five years of the Plan period.
 - This policy complements other policies in the Plan. It provides strategic support 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.
 - Within the framework of the guidance offered by this policy, Local Planning Authorities will be able to identify appropriate sites in the light of more detailed

and updated urban capacity studies.

- The EIP Panel concluded in para 4.37 of their report that “the urban capacity study may be regarded as taking a somewhat conservative approach to assessing future potential”. This and the other factors set out in the Technical Paper form the basis of the modest increase in urban capacity incorporated into the supply of housing used to derive the district distribution of new strategic greenfield sites. The Structure Planning Authorities accept the EIP Panel recommendation in para 1.33 referring to arrangements for effective monitoring of the Plan. The likely new arrangements for local development frameworks should facilitate a flexible approach to applying updated information on housing supply to revised proposals for housing provision. This policy will ensure that as part of this process, major new releases of greenfield housing land will not occur prematurely.

2. Not accepted.

- The deposit draft Explanatory Memorandum refers in para 2.6 to the aim of locating 55 % of **new** development in the Central Leicestershire Policy Area (CLPA). At the EIP, it was made clear that this was an aspirational target. It would also be unrealistic to apply the target to the total amount of development over the Plan period. This is because the Plan’s strategy for distribution has been unable to influence the distribution to date so only 42% of development in the first five years of the Plan period has been achieved in the CLPA. However, the distribution as set out in the Proposed Modifications would result in 53% of new development from 2001 being located in the CLPA over the remainder of the Plan period, close to the 55% target. This proposed distribution will also increase the quantity of housing in the CLPA over the whole Plan period from 28,025 (47% of the total) in the Supplementary Housing Report to 31,500 (50% of the total) in the Proposed Modifications. The EIP Panel recommendation that 19,000 dwellings should be allocated to Leicester could not be achieved if there were to be significant increases in housing provision in the rest of the CLPA outside Leicester. The dwelling provision recommended for the CLPA outside Leicester by the EIP Panel is therefore not accepted. Because of the significant under-achievement in relation to the 55% target for the CLPA in the first five years of the Plan period, the target could only be achieved if substantial amounts of additional greenfield land were to be released for housing within the CLPA outside Leicester. Such releases would undermine attempts to significantly maximise urban capacity and increase housing provision within Leicester;
- The proposed total Structure Plan provision for Hinckley and Bosworth is broadly in line with the EIP Panel’s recommendation. However, the EIP Panel’s recommendation would allow for very little new housing to meet the needs of Hinckley and Earl Shilton, taking into account the supply of 6,441 dwellings, 85% of which is outside the CLPA;
- Although a small part of the borough lies within the CLPA, there are no main towns and none of it adjoins the Leicester and Leicestershire Urban Area. It is considered therefore that any urban extension in the borough should be located outside the CLPA to meet the needs of Hinckley and Earl Shilton. Development needs within the CLPA can be met from the more modest element of Smaller Greenfield Sites;
- The EIP Panel’s recommended total provision of 2,400 dwellings for Oadby and

Wigston would imply new greenfield development of about 1,300 dwellings. Whilst it is accepted that as well as falling entirely within the CLPA the borough performs well against the sequential test in Strategy Policies 3A and 3B, greenfield development on that scale would have a serious impact on the already small amount of undeveloped land in the district, as well as competing with regeneration of previously developed land in Leicester. A smaller total provision of 1,700 is therefore proposed, which, taking into account the supply of 1,125 dwellings, will require maximum new greenfield development of 600 dwellings, on about 15 hectares of land. This is a significant reduction from the amount proposed in the Deposit draft of the Structure Plan.

3. Not accepted. The distribution and size of the sites represents a reasonable balance between providing for selective urban expansion to the Leicester and Leicestershire Urban Area and the main towns and the need for a certain critical size to enable adequate infrastructure to be provided. In addition, phasing the strategic sites until the last five years of the Plan period will enable Local Planning Authorities to select sites that will, if necessary, be capable of extension beyond the current Plan period, it being accepted that the larger they are, the wider the range of infrastructure they can support.
4. Not accepted. The Technical Paper provides clarification of this matter and consideration will be given to clarifying it further when the Explanatory Memorandum is revised.
5. Not accepted. The allocations referred to are already accounted for in the Plan. "Planning to Deliver" indicates that local plans that should designate particular sites as "strategic sites". It goes on to say that "the broad location of strategic sites may have been signalled by the structure plan", and that the rationale for their selection should be set out in the local plan. The EIP Panel recommended in para 4.81 that the Explanatory Memorandum should refer to the need for a review of local plan housing allocations. It would be inappropriate for the Structure Plan to pre-judge this by specifically referring to selected allocations.
6. Not accepted. The density used to calculate the area of land required for strategic greenfield sites is based on Housing Policy 5, which requires a **minimum** of 40 dwellings per hectare for locations well served by public transport and accessible to services and facilities. Strategic Greenfield Sites would have to meet the requirements of Strategy Policy 4, and would therefore fall into the 40 dwellings per hectare category in Housing Policy 5.

Proposed Policy Action

No change to Proposed Modification.

List of Respondents

Blaby District Council, Cawrey Limited, Community Planning and Regional Services, CPRE (Regional Officer), David Wilson Estates, Derbyshire County Council, Friends of Ratby Action Group, Glenfield Parish Council, Government Office for the East Midlands, Great Dalby Action Group, Hinckley & Bosworth Borough Council, House Builders Federation, J S Bloor (Measham) Ltd, Jelson Limited, John Littlejohn Ltd, Larkfleet Homes, Liberal Democrats- Oadby and Wigston Branch, Meadow Estate Resident Association, Miller Homes East Midlands, Oadby and Wigston Borough Council, Persimmon Homes (Midlands) Ltd, Ratby Parish Council, Redrow Homes, Revelan Group, Roger Tym & Partners, Somerby Parish Council, Wheatcroft and Son Ltd,

William Davis Ltd, Wood Frampton.

Helen Adam, Mrs K D Alvey, T Ancell, Dorothy Bacon, Robert Bowman, A Brooks, Mr and Mrs J K Cartfield, Mr and Mrs Chuasama, Shirley Clowes, Mr and Mrs E Coles, Mrs M Cooper, J E Cowan, R Cowan, Mrs Daelwyes, Mrs A G Davies, Mr H H Freudenberg, E Garnier, M P, Mr and Mrs Ghera, J S B, Gill, Dr M D and Mrs P M Glasse, Malcolm Gray, Janet and Jonathan Hal, Mr and Mrs Hales, Mrs M Harding, K Hardy, E Heckley, E and N Cuthbert, Mrs R A Hibbert, Mr and Mrs John Hough, Mrs C Jackson, Mr S S Johal, H R Johnson, Mr and Mrs R Johnson, Mr and Mrs Kerr, John and Linda Moore, Belinda Nuttall, Alison O' Carroll, R W Pain, Pravin Palmer, Mr K Patel, Dr I Payne, Mrs H Peters, Mr and Dr N J Roth, Miss M Rudd, Mr and Mrs D T Saunders, Mr and Mrs Sodhi, J and A Sparrow, Mr John B Stanford, Mr R W Swann, Mrs Y Tahir, Mrs J Talan, P D Wilsher, E A Woodfield, K W Woodfield, D E Woodward, Mr and Mrs Woodward, T K Worth.

<p><u>Policy No.</u></p> <p>Housing Policy 3: New Housing Provision on Previously Developed Land and through Conversions</p>
<p><u>Summary of Issues</u></p> <ol style="list-style-type: none"> 1. The minimum requirement is too cautious and should be 60% in line with the EIP Panel recommendation. 2. The minimum of 50% should be expressed as a target. 3. The policy is meaningless without an effective monitoring framework. <p>Five Representations of Support</p>
<p><u>Reasoned Response</u></p> <ol style="list-style-type: none"> 1. Not accepted. The minimum requirement of 50% is based on an assessment of availability of sites set out in Table 9 of the Technical Paper, and is realistic, given the characteristics of the Plan area. The assessment indicates that only 45% of completions to 2001 were on previously developed land, but that 50% could be achieved over the Plan period, due to the increased emphasis on using urban capacity and small sites. 2. Not accepted. A target is not rigorous enough to provide an impetus for development on previously developed land. A minimum allows for a higher percentage to be achieved over the Plan period. 3. Not accepted. The Structure Planning Authorities accept the EIP Panel recommendation in para 1.33 referring to arrangements for effective monitoring of the Plan and will make the necessary arrangements for an effective monitoring framework.
<p><u>Proposed Policy Action</u></p> <p>No change to Proposed Modification.</p>
<p><u>List of Respondents</u></p> <p>Birstall Parish Council, Burton and Dalby Parish Council, Community Planning and Regional Services, Gaddesby Parish Council, Glenfield Parish Council, Government Office for the East Midlands, Great Dalby Action Group, House Builders Federation, J S Bloor (Measham) Ltd, Miller Homes East Midlands and Clowes Dev, Miller Homes East Midlands, North West Leicestershire District Council, Redrow Homes, Somerby Parish Council, Wheatcroft and Son Ltd, William Davis Ltd, Wood Frampton.</p> <p>Mr A Brooks, Mr and Mrs J K Cartfeild, Mrs A Claxton, J E Cowan, R Cowan, Mrs A G Davies, A P Goodwin, Mrs Didi Powles, Sally Smart, J and A Sparrow, E A Woodfield, K W Woodfield.</p>

Policy No.

Housing Policy 4: Affordable Housing

Summary of Issues

1. Target figures for affordable housing should be retained in the policy.
2. Target figures for affordable housing should at the very least be set out in the Explanatory Memorandum.
3. Detailed criteria should not be introduced “by the back door” through changes to the Explanatory Memorandum.
4. Circular 6/98 is clear that the site size threshold should be 25 dwellings in areas outside inner London and only where justified by housing needs assessments should a lower threshold be used.

Seven Representations of Support

Reasoned Response

1. Not accepted. The EIP Panel recommended that target figures for affordable housing should be removed from the policy, as this goes beyond current government guidance in Circular 6/98.
2. Not accepted. The Explanatory Memorandum is not being considered as part of the Proposed Modifications, however, consideration will be given to clarifying this matter when the Explanatory Memorandum is revised.
3. Not accepted. It is not intended to introduce detailed criteria “by the back door”. The Explanatory Memorandum provides explanation but does not form part of the policies of the Plan.
4. Not accepted. The Explanatory Memorandum is not being considered as part of the Proposed Modifications, however, consideration will be given to clarifying this matter when the Explanatory Memorandum is revised.

Proposed Policy Action

No change to Proposed Modification.

List of Respondents

Blaby District Council, Birstall Parish Council, Community and Regional Planning Services, Glenfield Parish Council, Harborough District Council, Hinckley and Bosworth Borough Council, House Builders Federation, Miller Homes (East Midlands), Redrow Homes, Soar Valley Protection Society, William Davis Ltd.

Sally Smart

Policy No.

Housing Policy 5: Density and Design

Summary of Issues

1. The Structure Plan should require all local plans to include a 10% flexibility allowance in case density targets are not met with reserve sites to meet the shortfall.
2. The policy should refer to a threshold of 0.3 ha or 10 dwellings or more, whichever is the smaller.
3. Delete “attain” and add “surpass”.
4. Over-rigid and over-prescriptive. Delete part of policy after (d).
5. Density guidelines go well beyond what is currently being achieved. Suggest 30-35 dwellings per hectare across the County with densities for particular sites a matter for local plans.
6. Density guidelines are inflexible, unrealistic and do not take account of the character of the local area.
7. 50 dwellings per hectare goes beyond PPG3 requirement of 30.
8. Density too low in City Centre. Add caveat that within 500m of travel/transport interchanges the priority will be to develop sites at the highest density possible (up to 300 dwellings per hectare in the City Centre)
9. Further clarification as to what constitutes a local centre or other centre well-served by public transport should be provided in the Explanatory Memorandum.
10. Density of 30 dwellings per hectare in rural locations will be used to justify the redevelopment of garden land.

Two Representations of Support.

Reasoned Response

1. Not accepted. The EIP Panel cautioned against the use of flexibility allowances. Some sites may exceptionally be developed at lower densities than proposed in the policy, but other sites coming forward at higher densities will be expected to compensate for this.
2. Not accepted. The EIP Panel recommended that the threshold should be expressed as 0.3 ha rather than 10 dwellings to avoid the risk of schemes being put forward which are just below the threshold.
3. Not accepted. The word “surpass” is not necessary as the policy refers to minimum densities but requires development to be at as high a density as possible.
4. Not accepted. The EIP Panel recommended this part of the policy. It is considered appropriate and in accordance with government guidance to specify higher density development in locations with good public transport accessibility.
5. Not accepted. The proposed densities may go beyond what is currently being achieved, but is intended to encourage development at as higher density as possible. It is not accepted that there should be a standard density across the plan area, as densities should be higher in locations with better public transport accessibility, as

recommended in PPG3.

6. Not accepted. Criteria (a) – (d) of the policy are intended to ensure that densities are realistic and take account of the local context.
7. Not accepted. PPG3 recommends densities between 30 and 50 dwellings per hectare.
8. Not accepted. The policy requires that development should be at as high a density as possible. The figure of 50 dwellings per hectare for the City Centre is a minimum figure.
9. Not accepted. The Explanatory Memorandum is not being considered as part of the Proposed Modifications, however, consideration will be given to clarifying this matter when the Explanatory Memorandum is revised.
10. Not accepted. The recommended minimum of 30 dwellings per hectare in rural locations does not imply that garden land will be developed. The selection of sites for development is a matter for other policies of the Plan and for local plans. By requiring sites to be developed at as higher density as possible, the policy could reduce the potential need for garden land to be developed.

Proposed Policy Action

No change to Proposed Modification.

List of Respondents

Carlton Parish Council, Cawrey Ltd., Clowes Developments (UK) Ltd.,
Community and Regional Planning Services, Harborough District Council, House
Builders Federation, Miller Homes (East Midlands), Soar Valley Protection
Society.

Mr A Brooks