

Matter 3 – Housing Delivery

March 2018

Local Plan Examination Matter Statement



*Oadby and Wigston
Borough Council*

Issue 1: Whether the Local Plan, in particular policies 11 – 15, will be effective in delivering the appropriate type of housing to meet the needs of the area?

Q1. Are the housing densities set out in Policy 12 justified?

Council response;

1. Yes. The Council considers that Policy 12 is justified, for the reasoning set out below. The Borough area is compact, dense and relatively highly urbanised. Its current built up area extent forms part of the Leicester Principal Urban Area. The Borough settlements are also intrinsically linked to the City of Leicester.

2. Due to the distinct urban nature of the Borough, within the Council's Local Plan Preferred Options consultation document, a two tiered approach to housing density was promoted. The two tiered approach proposed was for 50 dwellings per hectare within the town and district centre locations, and 40 dwellings per hectare within all areas outside of the town and district centre locations. Due to the distinct urban nature of the Borough area, it was considered that such densities would not be out of character.

3. Comments received during the Local Plan Preferred Options consultation suggested that policy relating to housing densities within the Borough area should afford a greater level of flexibility. At a similar time the Department for Communities and Local Government produced the White Paper – 'Fixing our broken housing market', which suggested that land should be utilised efficiently and the building of homes at low densities should be avoided. The White Paper also suggested that the particular scope for higher-density housing in urban areas that are well served by public transport should be addressed. In formulating Policy 12 within the Submission Local Plan, the Council took account of both the suggested need for a greater level of flexibility, as well as the suggestions put forward within the White Paper. The Council also took account of the Government's Autumn Budget 2017 which sought to increase the housing densities within urban areas.

4. The Council's Submission Local Plan Policy 12 requires all development of 0.3 hectares and above to meet minimum density standards. For development located within the town and district centres at least 50 dph is required; for development outside of the town and district centres but still within the Leicester Principal Urban Area at 40 dph is

required; and, for development located elsewhere within the Borough at least 30 dph is required. In addition to the flexibility relating to development location, the policy allows a level of flexibility relating to viability, character and design.

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Q2. Are the affordable housing requirements set out in Policy 13 justified and deliverable?

Council response;

5. Yes. The Council considers that Policy 13 is justified and deliverable for the reasons set out below.

6. Between the period 1st April 2006 and 31st March 2017 (10 years), the Council has delivered 233 additional affordable homes (see LP7/02). The Council is committed to continuing consistent delivery of affordable homes, therefore has set a threshold of 11 dwellings (consistent with national policy and guidance) or more relating to required provision of affordable homes.

7. The split targets on qualifying development sites of 10 per cent provision in South Wigston, 20 per cent provision in Wigston, and 30 per cent provision in Oadby are recommended, evidenced and justified in the Council's Affordable Housing Viability Study 2016 (the Study) (LP7/01). Chapter 6 of the Study sets out the viable policy options for the split affordable housing targets, with Chapter 7 of the Study setting out the main findings and conclusions. Chapter 7 of the Study at paragraph 7.17, also sets out the recommendations for the most appropriate targets for plan making purposes.

8. In addition to the Affordable Housing Viability Study 2016 (LP7/01), the Council commissioned a Whole Plan Testing Viability Study 2017 (LP6/20). Part of the study was to assess and update the outcomes of the 2016 Affordable Housing Viability Study. Chapter 9 of the Whole Plan Testing Viability Study 2017 (LP6/20), specifically paragraphs 9.3 to 9.6 reiterate the outcomes that suggest the threshold and percentage targets for affordable housing proposed within the Submission Local Plan are viable, justified and deliverable.

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Q4. How do the Council envisage the cumulative approach set out in Policy 13 to work, in practice, for example where a 'piecemeal' type application (of potentially of less than 11 dwellings) is submitted but there are no other associated planning applications on a wider site?

Council response;

9. The Council is seeking to implement the 'cumulative' approach to affordable housing delivery due to a number of historical instances where planning applications for proposed residential development on a site, have been submitted to the Council under the threshold for affordable housing contribution, albeit that it is evident to the Council that once the site is delivered in full, the numbers would exceed the threshold.

10. The Council will apply the approach, when it is distinctly evident that the proposed development comprises part of a wider site, or could form part of a wider site in the future. At the time of determination / decision making, the Council will highlight (and if appropriate, set out the approach within the Decision Notice) the potential for 'cumulative' impact for future development opportunities.

11. Unless it is distinctly evident to the Council that a development proposal will not form part of a wider site in the future, the Council will highlight the potential for 'cumulative' impact at the time of determining / making a decision on the first / initial development proposal. The 'cumulative' part of Submission Local Plan Policy 13 Affordable Housing will then apply once the 11 or more threshold has been met / exceeded. In addition, the approach would be applied across the entire site, and not just the later application proposals that met the threshold.

12. The Council considers that it will not be appropriate to apply the 'cumulative' approach at a later date, if the Council has not previously stated that the cumulative approach will apply should further development be proposed.

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Q5. Will Policy 14 be effective? It states the Council 'will encourage' and 'consider proposals for' the provision of Self Build and Custom Build serviced plots. Does this provide clarity to developers, local communities and other interests about what is required? Is it consistent with policies 18, 20 and 21?

Council response;

13. Yes. The Council considers that Policy 14 is in conformity with national guidance set out in the National Planning Practice Guidance (LP1/02) and allows sufficient clarity for developers, the local community and other interested parties. Paragraph: 025 Reference ID: 57-025-201760728, states that *'relevant authorities should consider how they can best support self build and custom housebuilding in their area. This could include:*

- *Developing policies in their Local Plan for self build and custom housebuilding;*
- *...and engaging with landowners who own sites that are suitable for housing and encouraging them to consider self build and custom housebuilding and facilitating access to those on the register where landowner is interested.'*

14. As required by national policy, guidance and legislation, the Council holds a register of individuals and associations of individuals who are seeking to acquire serviced plots of land in the Borough area for self build and custom housebuilding. Throughout the duration of the Local Plan production, the Council held details of numerous individuals seeking serviced plots. For Base period 1 (April 2016 – 30th October 2016) 2 individuals sought inclusion on the Council's Register, for Base Period 2 (31st October 2016 – 30th October 2017) 6 individuals sought inclusion, and so far for Base Period 3 (31st October 2017 – 30th October 2018) 5 individuals have sought inclusion.

15. Due to the interest from individuals seeking the provision of serviced plots of land in the Borough area for self build and custom housebuilding and proposals set out in national guidance suggesting that the Council has 3 years from the end of each Base Period to permit serviced plots, the Council considers it appropriate to propose relevant planning policy within the Local Plan, that supports the provision / delivery of self build and custom housebuilding plots.

16. As currently worded, the wording of Submission Local Plan Policy 18, 20 and 21 is not consistent with the wording of Policy 14. Wording of Policy 18, 20 and 21 requires on-site provision of self build and custom build plots. The Council considers that the most appropriate locations for self build and custom housebuilding is on the three proposed Direction for Growth areas, as it contributes towards the delivery of a wide choice of high quality homes, as well as widening opportunities for home ownership, market trends and the needs of different groups in the community, in the right locations. The Council also considers that the three Direction for Growth Areas will provide a sufficient number of serviced plots to meet the current demand up to 30th October 2021, as well as future demand if necessary.

17. The Council considers that requiring the provision of serviced plots on all development over 10 dwellings (as stated in Policy 14) would not be appropriate and could have a detrimental impact on development viability and deliverability. However, the Council would still want to be able to discuss the provision of self build and custom housebuilding plots on a case by case basis if there was a significant need to do so.

18. Although the Council considers that it is not necessary for Policy 14 to be consistent with Policy 18, 20 and 21, due to the reasons set out above, if for reasons of Local Plan Soundness, consistency was required, the Council would amend the wording of Policy 14 appropriately.

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Q6. Would a requirement to include Self Build and Custom Build serviced plots on all residential developments be justified?

Council response;

19. No. In addition to that noted by the Council in its explanation to Matter 3 Question 5, the Council does not consider it appropriate to subject all development to provision of self build and custom housebuilding plots.

20. Due to the limit number of individuals held on the Council’s Register, at the time of writing the Local Plan Submission document, the Council is confident that the three proposed Direction for Growth areas will meet the required demand.

21. To ensure that the appropriate policy monitoring takes place, the Council proposes to include an additional monitoring target in Chapter 12 Monitoring Framework of the Local Plan. See proposed amendment (additional text) below.

Spatial Objective	Key relevant policies	Other related policies	Target(s)/ Threshold(s)	Potential risk(s) to delivery	Possible action if target is not met
Spatial Objective 8: A balanced housing market	Policy 11 – Housing Choices; Policy 13 – Affordable Housing; <u>Policy 14 – Self Build and Custom Build;</u> Policy 16 – Gypsies, Travellers and Travelling Showpeople	Policy 2; Policy 5; Policy 12; Policy 15; Policy 17; Policy 18; Policy 20; Policy 21; policy 46	Proposed development sites that have a gross site size of 0.3 hectares and larger and are not situated within any of the above locations will be required to achieve an average density of at least 30 dwellings per hectare. <u>The Council will meet the demand for Self Build and Custom Housebuilding plots within</u>	Economic downturn Unforeseen physical constraints. Unplanned growth of out of Borough residential development. Tightening of finance availability. Site becomes unattractive to the market for residential	Identify the problem and / or cause of poor performance. Consider a review of the planning policy itself. Be more proactive in liaising with landowners and developers. If appropriate to do so, bring forward other sites allocated within the Plan sooner than envisaged.

			<p><u>the Borough area. The demand will be determined taking account of interest registered on the Council's Self and Custom build Register and the Base Periods set out in national guidance.</u></p>	<p>development. Site releasing infrastructure delays. Land values drop considerably meaning developers begin to build at lower densities.</p>	<p>Stimulate demand for new development opportunities through active promotion.</p>
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22. The Council will monitor the proposed target relevant to Self Build and Custom Housebuilding plot provision on an annual basis. Should monitoring suggest that the current planned position set out in the Submission Local Plan is not meeting demand, a review of the policy will take place in accordance with national guidance, for example, no later than 5 years from adoption of the Local Plan.

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