

Leeds SAP Revised Submission Draft Consultation
 Policy and Plans Group
 The Leonardo Building
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 Leeds
 LS2 8HD

SENT BY EMAIL
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 15/02/2021

Dear Sir / Madam,

LEEDS SITE ALLOCATIONS PLAN (REMITTED): PROPOSED MAIN MODIFICATIONS

1. Thank you for consulting with the Home Builders Federation (HBF) on the Proposed Main Modifications to the remitted part of the Leeds Site Allocations Plan (SAP).
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. Following the outcome of the legal challenge to the SAP by the Aireborough Neighbourhood Forum, the High Court ordered that 37 Green Belt sites across the Plan area need to be Remitted, meaning they must be reconsidered by Leeds City Council and then the Secretary of State to determine whether they should be included in the Plan. The Council is now proposing that the 37 Green Belt sites should be deleted from the SAP.
4. The Council has proposed Main Modifications to the Plan to delete the 37 sites as housing and mixed-use allocations. The sites to be deleted are:

Table 1: Main Modification Sites to be Deleted	
Aireborough	
HG2-1	New Birks Farm, Ings Lane Guiseley
HG2-2	Wills Gill, Guiseley
HG2-4	Hollins Hill, Hawkstone Avenue, Guiseley
HG2-9	Victoria Avenue, Yeadon
East Leeds	
HG2-119	Red Hall Playing Fields, LS17
HG2-123	Colton Road East Colton
HG2-174	Wood Lane – Rothwell Garden Centre

MX2-38	Barrowby Lane, Manston LS15
North Leeds	
HG2-36	Alwoodley Lane, Alwoodley, LS17
HG2-38	Dunstarn Lane, Adel LS16
HG2-42	Broadway and Calverley Lane, Horsforth
HG2-43	Horsforth Campus
HG2-46	Horsforth (former waste water treatment work)
Outer North East	
HG2-26	Wetherby Road, Scarcroft Lodge, Scarcroft
Outer North West	
HG2-17	Breary Lane East, Bramhope
Outer South	
HG2-174	Wood Lane, Rothwell Garden Centre, LS26
HG2-175	Bullough Lane, Haigh Farm, Rothwell LS26
HG2-177	Alma Villas, Woodlesford LS26
HG2-180	Land between Fleet Lane & Methley Lane, Oulton
HG2-183	Swithens Lane, Rothwell, LS26
HG2-186	Main Street, Hunts Farm, Methley
Outer South East	
HG2-126	Micklefield Railway Station Car park, LS25
HG2-133	Ninevah Lane, Allerton Bywater
Outer South West	
HG2-136	Whitehall Road, Harpers Farm
HG2-150	Land East of Churwell LS27
HG2-153	Albert Drive, Morley
HG2-159	Sissons Farm, Middleton, LS10
HG2-165	Thorpe Hill Farm, Lingwell Gate Lane, Thorpe
HG2-166	Long Thorpe Lane, Thorpe, Wakefield WF3
HG2-167	Old Thorpe Lane, Tingley WF3
HG2-233	Land at Moor Knoll Lane, East Ardsley
Outer West	
HG2-53	Calverley Cutting, Apperley Bridge
HG2-63	Woodhall Road, Gain Lane, Thornbury BD3
HG2-65	Daleside Road, Thornbury North
HG2-68	Waterloo Road, Pudsey, LS28
HG2-69	Dick Lane, Thornbury
HG2-71	Tyersal Road, Pudsey
HG2-72	Land off Tyersal Court, Tyersal

5. The HBF does not consider these modifications to be sound as they are not considered to be positively prepared or justified. The HBF continues to have concerns in relation to the approach of the Council in relation to housing allocations and housing delivery, as set out in all of our previous responses. The HBF recommends that the Council continues to work with and engage home builders and developers to ensure that the supply of homes remains deliverable.
6. The HBF considers that the reduction in allocations will only increase the issues with housing land supply in terms of range and distribution not just quantity, it will not provide a balanced housing market and will do nothing to positively contribute to the delivery of housing and the local plan as a whole.

7. The Council have had well documented issues with housing delivery, with delivery regularly below the 3,660 dwellings proposed in policy SP6 of the Core Strategy (2012-2028) (November 2014), (the Core Strategy had a housing requirement of 3,660 from 2012/13 to 2016/17 and 4,700 thereafter). The Core Strategy has since been updated by the Core Strategy Selective Review (CSSR) (2019) (September 2019) and now proposes that 51,952 (net) new dwellings should be provided between 2017 and 2033, with a target of 3,247 dwellings per year. Table 2 below shows the completions in Leeds in the last five years. It shows that there remains under delivery against the Core Strategy housing requirement.

Year	MHCLG Net Additional Dwellings	Leeds Core Strategy	Difference
2015/16	2,474	3,660	-1,186
2016/17	2,824	3,660	-836
2017/18	2,283	3,247	-964
2018/19	3,427	3,247	180
2019/20	3,333	3,247	86
Total	14,341	17,061	-2,720

8. The HBF consider that the reduction in allocations will only increase these issues with housing land supply. Therefore, the HBF does not consider that the Council should delete the allocations, instead the HBF recommends that the Council actually consider the exceptional circumstances that exist in Leeds. The HBF considers that these exceptional circumstances may include the need to provide for homes across the area and each of the HMCAs, to provide an appropriate mix and range of sites and dwellings to meet needs, to ensure that it is able to provide a rolling five-year housing land supply and to minimise the risk of unplanned development coming forward through appeals.
9. The NPPF¹ is clear that to support strong, vibrant and healthy communities and to support the Government's objective of significantly boosting the supply of homes there is a need to ensure that a sufficient number and range of homes are provided where they are needed and to meet the needs of present and future generations including groups with specific housing requirements (e.g., families with children). The HBF does not consider that the currently proposed modifications will ensure that, that can happen.
10. The implications of the decision to delete these allocations is likely to see a reduction in the range and variety of homes provided and in the locations in which the homes are provided.
11. Policy SP7 sets the distribution of the housing requirement in Policy SP6, the table following paragraph 6.3 of the SAP Remittal Background Paper shows the position as at 1st April 2020 in terms of completions 2017 to 2020 and expected supply to 2028. It identifies a significant oversupply within the City Centre and Inner Area HMCAs, and undersupplies in many of the other areas including Aireborough, East Leeds, North Leeds, Outer North East, Outer South, Outer South East and Outer South West. Table 3 below utilises the information provided by the SAP Remittal Background Paper but adds additional information to show how significantly the proportions provided in Policy SP7 are being deviated from. This clearly identifies that not only is there an oversupply in the City Centre, in fact it is providing almost twice as much of the

¹ NPPF Paragraph 8(b) and 59

housing supply as the policy distribution sets out, whilst areas such as Aireborough and the Outer South are providing less than half of the proportion they should be.

Table 3: Distribution of Housing Land								
HMCA	Policy %	Housing Requirement 2017-2028	Completions 2017-2020	2020 SHLAA Supply to 2028	Total	Balance	Total %	Comparison: Supply to Policy %
Aireborough	3%	956	187	276	463	-493	1.1%	36%
City Centre	16%	5,099	1,930	11,733	13663	8,564	31.7%	198%
East Leeds	17%	5,417	485	4,242	4727	-690	11.0%	64%
Inner Area	15%	4,780	1,759	8,790	10549	5,769	24.5%	163%
North Leeds	9%	2,868	858	1,940	2798	-70	6.5%	72%
Outer North East	8%	2,549	500	1,333	1833	-716	4.2%	53%
Outer North West	3%	956	234	931	1165	209	2.7%	90%
Outer South	4%	1,275	385	403	788	-487	1.8%	46%
Outer South East	7%	2,231	385	1,167	1552	-679	3.6%	51%
Outer South West	11%	3,505	669	2,555	3224	-281	7.5%	68%
Outer West	7%	2,231	508	1,865	2373	142	5.5%	79%
Total	100%	31,867	7,900	35,235	43,135	11,268	100%	100%

12. This focus of development within the city centre and inner areas also has implications for the type, size and tenure of the homes provided. The SHMA (2017) identified an affordable housing need of 1,230 new affordable homes each year, this is approximately 38% of the overall housing requirement set out in the CSSR. Policy H5 of the CSSR provides the affordable housing policy for Leeds it sets out that on major housing developments affordable housing provision should be provided to meet certain targets for Zone 3 & 4, which cover the city centre and inner area, this target is 7%. It is therefore apparent that if the majority of the supply is provided in the areas where the affordable housing provision is only going to be 7% of the homes provided, that the affordable housing need of 1,230 homes is very unlikely to met. This focus of delivery in the city centre and inner areas, with low levels of provision in other areas, will also potentially means that even in areas with a higher policy target may not deliver the affordable homes they need due to the low number of homes to be provided overall.
13. This issue with affordable housing delivery can already be seen in the table following paragraph 11.2 in the SAP Remittal Paper, where the provision of affordable homes since 2012 has not even reached 50% of this affordable housing need in a single year. As shown in Table 4 below, since the SHMA was published in 2017 there has been a significantly under-delivery of affordable homes with a shortfall of 2,580 already identified. Highlighting that the affordable housing need is likely to be increasing and is by now potentially in excess of the SHMA figure of 1,230.

Table 4: Affordable Housing Provision			
Period	Affordable Completions	Affordable Housing Need	Difference
2017/18	238	1230	-992
2018/19	433	1230	-797
2019/20	439	1230	-791
Total	1110	3690	-2580

14. It is also noted that this focus on the city centre and the inner area is likely to lead to a higher proportion of homes being provided as apartments and / or with smaller number of bedrooms. This may not provide the appropriate mix of homes. It is likely that due to recent circumstances that people's aspirations and needs may have changed from those identified by the 2017 SHLAA, it is also possible that the delivery of homes since the SHLAA was prepared has led to changes in the existing stock. Zoopla's House Price Index (November 2020)² highlights that price growth for houses (4.3%) is more than double that for flats & apartments (1.8%). It states that the search for space has been a key feature of the market due to Covid-19 restrictions, as households re-evaluate their housing requirements. It goes on to state that demand for family housing with gardens, parking and extra space to work from homes has continued to rise. This suggests that the market is already changing and may need further consideration, to ensure that the appropriate homes are provided in Leeds. The HBF recommends that the Council look again at their existing stock, the market aspirations and needs, and the potential mix of their future supply.
15. Paragraph 2.46 of the SAP states that Leeds City Council's Children's Services have been involved throughout in the consideration and evaluation of sites for housing. It goes on to state that where necessary, housing allocations will need to set aside land for provision of a school or schools, to ensure that there are sufficient school places to meet the needs of an expanded population. It is noted that this includes some of the sites proposed to be deleted. It is not clear how this will impact on the school capacity in the area, which presumably given paragraph 2.46 will no longer be sufficient to meet the needs of the population. The HBF consider that it may be beneficial for the Council to consider the implications of the loss of infrastructure that will potentially arise from the site deletions, and the potential impact this could have on communities.
16. The HBF note that the Council have found themselves in this difficulty at least in part due to the timing of the production of the SAP which was intended to provide the allocations to support the housing requirement in the Core Strategy (2014) but ended up being prepared almost at the same time as the Core Strategy Selective Review (2019), which sought to reduce the housing requirement. The HBF are concerned that the Council could find themselves in a similarly difficult situation due to the lack of flexibility in their supply and potential impacts of the Government's latest changes to the Standard Methodology for the calculation of the Local Housing Need (LHN). This suggest that the Council will need to provide 3,763 dwellings each year to meet its local housing need, significantly above the housing requirement set in the CSSR (2019).

Future Engagement

² <https://advantage.zpg.co.uk/wp-content/uploads/2020/12/Zoopla-UK-house-price-index-Dec2020-final.pdf>

17. I trust that the Council and the Planning Inspectorate will find these comments useful as they continue to progress the SAP. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
18. The HBF would like to be kept informed of the progress of the remittal sites. Please use the contact details provided below for future correspondence.

Yours sincerely,

A handwritten signature in cursive script, appearing to read 'J. Harding'.

Joanne Harding

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