

Matter 1 Legal and Procedural Requirements

Issue 1: have the relevant procedural and legal requirements been met?

Q1. In respect of the Duty to Co-operate, what are the key outcomes from the co-operation with neighbouring authorities?

1. The HBF does not wish to comment on this question at this time.

Q2. Is the Sustainability Appraisal (SA) of the Council's proposed Main Modifications (MMs) suitably comprehensive including the SA objectives?

2. The HBF does not wish to comment on this question at this time.

Q2a. Has the SA sufficiently assessed the reasonable alternatives?

3. The HBF is concerned that the SA may not have sufficiently assessed the reasonable alternatives, it appears that the SA has been undertaken at a strategic level, and it is not clear how much consideration has been given to the individual sites and their impacts. It is also not clear how much consideration has been given to emerging policies which will come forward nationally and locally during the local plan period such as Biodiversity Net Gain and the Future Homes Standard. It is considered that these could have some significant impacts on how the sustainability of the sites should be assessed. The HBF also considers that the positive aspects of delivering homes have often been downplayed within the assessment.

Q2b. What are the reasons for selecting the preferred option and rejecting other approaches, and is this clearly set out in the Council's evidence base?

4. The HBF is concerned that the reasons for selecting the preferred option and rejecting the other approaches has not been clearly set out in the Council's evidence base. The Background Paper (March 2021) sets out the initial three options, firstly to propose all 37 sites allocations, secondly to propose none of the 37 sites as allocations, and thirdly to propose some of the sites as allocations to address housing shortfalls in certain HMCAs. It then goes on to consider an additional option 4 considered following the consultation, which looks to propose none of the sites as housing allocations but to include 1 site for employment use allocation. It goes on to summarise the findings of the Sustainability Appraisal and to provide information in relation to the supply, provision for affordable homes and schools. Section 23 of the Paper goes on to provide the conclusions in relation to the options, it selects Option 4 as the preferred option. The HBF is concerned that certain benefits associated with options 1, 3 and 4 are downplayed by the Paper and that the evidence required to determine the exceptional circumstances to justify Green Belt release are not fully explored or considered in detail as a cumulative consideration. The HBF is also concerned that option 4 is not fully explored in relation to the potential that other sites could make to contributing to the employment land requirement or as a mixed development.

Q3. Has the Remitted Part of the Site Allocations Plan (SAP) been prepared to comply with the Statement of Community Involvement, and meeting the minimum consultation requirements set out in the Regulations?

5. The HBF does not wish to comment on this question at this time.

Home Builders Federation (HBF) response to the
Inspector's Matter, Issues and Questions
on the Examination of the Leeds Site Allocations Plan Remittal