

Matter 2 – the Remitted Sites

Issue 2: is the proposed deletion of the 37 green belt site allocations for housing and mixed use justified and consistent with national policy?

Housing Requirement

Q4. Is the Council's use of the housing requirement set out within the Core Strategy Selective Review appropriate and consistent with national policy?

1. The HBF notes 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 is 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) including the 35% uplift.

Q4a. Has appropriate regard been had to the latest national planning guidance which indicates a 35% uplift in requirement for Leeds resulting in 3,763 homes per annum? What would the implications be of needing to meet this requirement?

2. The HBF does not consider that the Council have given any regard to the latest national planning guidance which indicates a 35% uplift in the minimum local housing need identified by the Standard Methodology for Leeds. The HBF is concerned that whilst a Local Plan should be providing a plan-led system and a level of certainty around the level and location of development for both the local community and developers that in this case the Local Plan is doing anything but.

Q4b. To what extent would the removal of the sites for housing and mixed use affect the Council's economic ambitions in the City and individual Housing Market Characteristic Areas (HMCAs)? Is there any evidence relating to the consideration of economic growth and the proposed MMs?

3. The HBF does not wish to comment in relation to this question at this time.

Housing Supply

Q5. Is the Council's approach to estimating supply in the Strategic Housing Land Availability Assessment (SHLAA) consistent with national guidance on deliverability and developability of sites?

4. The NPPF and PPG together set out the information and evidence that the Council need to demonstrate a sites deliverability or developability. The SHLAA Site Proformas contain the Council's evidence in relation to each site's deliverability or developability. However, it is noted that in relation some sites the Proformas contain bland statements which do not actually confirm the availability of the site or the timescale for its delivery. They say things like 'the Council takes a proactive approach to land availability and has contacted landowners, agents and developers to confirm the availability of sites', this does not actually confirm that the site is available and that it will be brought forward.

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There are also sites that have previously had permissions that are now expired, where very little detail is provided as to why the permission expired and why it is still considered deliverable or developable. The HBF is therefore concerned that the Council's approach to estimating supply in the SHLAA is not consistent with either the NPPF or the PPG.

Q5a. Is there sufficient evidence to indicate that sites that are in the SHLAA will contribute to the housing land supply at the time envisaged? Do other forms of housing such as the private rental sector and student accommodation have the potential to reduce the supply?

5. The HBF would expect the Council to work closely with the development industry to ensure that there is sufficient evidence to ensure that sites will deliver at the time expected in the SHLAA. At present this is not evident from the evidence provided within the SHLAA or the site proformas.

Q5b. Is the continued reliance on large windfall sites justified and based on robust evidence?

6. The adopted Core Strategy sets a windfall allowance of 500 units per year. The SHLAA suggests that this is based on the historic delivery of small sites below the SHLAA site size threshold of 0.2ha outside of the city centre. Table 1 of the SHLAA showing the SHLAA sites by type and the level of supply does not appear to include the windfall allowance. However, the five-year housing supply statement does appear to include the 500dpa windfall allowance, adding 2,500 dwellings to the five-year housing land supply. The HBF does have some concerns around the significant number of dwellings included in the five-year supply from the windfall allowance, and the potential for double counting of sites with planning permission in the early years. The NPPF is clear that where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.

Q5c. Is the build out rates of sites of over 50 dwellings in the SHLAA justified and robust and based on clear evidence?

7. The HBF would expect the Council to work closely with the developers of the individual sites to ensure that the build out rates proposed are appropriate. The HBF would expect the Council to be able to provide evidence of these discussions or correspondence to ensure that the rates used are appropriate for the sites.

Q5d. Will the housing land supply be sufficiently flexible to respond to changing circumstances up to 2028? Is the reliance on a small number of sites for the supply of homes between 2025 and 2028 justified?

8. The HBF considers that it is important that the Plan has sufficient flexibility to adapt to change and to ensure that the housing requirement will be met over the Plan period. The HBF does not wish to comment on the deliverability or developability of individual sites. However, the HBF would recommend that the Council works closely with the developers of the allocations to ensure that the assumptions made about their delivery are correct and robust.

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Q5e. Is the evidence relating to the 5-year housing land supply robust and in line with national policy and guidance?

9. The PPG¹ sets out the evidence that local authorities can use in demonstrating that there is a reasonable prospect that a site is deliverable and developable. This includes the current planning status, progress being made towards the submission of an application, site assessment work or relevant information in relation to the site viability, ownership, infrastructure and constraints. The HBF is concerned that the SHLAA and the SHLAA proformas do not always appear to provide sufficient information to confirm that this evidence has been considered in determining the deliverability of the sites.

Q5f. Are the assessments of shortfall or oversupply of housing in each HMCA correctly identified? Are the figures provided by the Council in the SAP Remittal Background Paper (CDREM1/3 paragraph 6.3) the most-up to date?

10. The HBF considers that this a question for the Council to address.

Plan policies and the spatial distribution of homes within Leeds

Q6. Are the proposals to delete the 37 Green Belt site allocations for housing and mixed use consistent with the requirements of Policies SP1 and SP6 of the Core Strategy?

11. Spatial Policy 1 of the Core Strategy (incl. CSSR) looks to deliver the spatial development strategy based on the Leeds settlement hierarchy, part (i) of the policy states that the largest amount of development will be located in the Main Urban Area and Major Settlements, Smaller Settlements will contribute to development needs with the scale of growth having regard to the settlements size, function and sustainability, part (viii) looks for the Council to undertake a review of the Green Belt to direct development consistent with the overall strategy.
12. Spatial Policy 6 sets out the housing requirement of 51,952 net new dwellings between 2017 and 2033, with a target for 3,247dpa. The policy goes on to state that guided by the Settlement Hierarchy, the Council will identify 46,352 dwellings (gross) to support the distribution in Spatial Policy 7.

Table 1 below sets out the settlement hierarchy as follows:

Table 1: Table 1 of the CSSR – Identification of Settlement Types	
Settlement Type	Location
Main Urban Area	Leeds City Centre and the surrounding communities and neighbourhoods forming the main urban and suburban areas of the City
Major Settlements	Garforth Guiseley/Yeadon/Rawdon Morley Otley Rothwell Wetherby
Smaller	Allerton Bywater

¹ PPG ID: 68-007-20190722 and 68-020-20190722

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Settlements	Bardsey Barwick-in-Elmet Boston Spa Bramham Bramhope Calverley Collingham Drighlington East Ardsley Gildersome Kippax Lofthouse/Robin Hood Micklefield Mickletown Methley Pool-in-Wharfedale Scholes Swillington Tingley/West Ardsley
Villages	All other settlements

13. Spatial Policy 7 states that the distribution of housing land (excluding windfall) will be planned based on Housing Market Character Areas as follows:

Table 2: Table from Spatial Policy 7 of the CSSR – Distribution of housing land and allocations	
HMCA	Percentage
Aireborough	3%
City Centre	16%
East Leeds	17%
Inner Area	15%
North Leeds	9%
Outer North East	8%
Outer North West	3%
Outer South	4%
Outer South East	7%
Outer South West	11%
Outer West	7%
Total	100%

14. The HBF is concerned that the proposal to delete the 37 Green Belt sites may mean that the spatial distribution of sites is no longer in line with that proposed in SP7, prepared in order to support the development hierarchy and overall settlement strategy set out in Policy SP1 and SP6.

Q6a. Is the effect of the proposed MMs on the spatial distribution of homes as set out in Policy SP7 justified and would it be in accordance with national policy and guidance in respect of the location of new homes?

15. 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

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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 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%

16. The HBF does not consider the effect of the proposed MMs on the spatial distribution is in accordance with national policy, the NPPF² states that to support Government's

² Paragraph 60

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objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed. The NPPF³ goes on to state that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including but limited to those who require affordable housing, families with children).

Q6b. To what extent would a change in distribution in the Housing Market Character Areas affect settlement sustainability?

17. The HBF is concerned that the Council have considered Spatial Policy 7 appropriate at the examination of the Core Strategy and did not consider it necessary to update the policy as part of their Core Strategy Review. The justification for the policy states that it intended to provide an indication of the overall scale and distribution of development that will need to be planned for combining information from the SHMA and SHLAA in different HMCAs. It also states that the distribution reflects the quantum of housing growth that accord with the housing growth principles and overall spatial strategy. Therefore, the HBF is concerned that any significant change to this distribution has the potential to impact on the sustainability of the settlements in these areas, by not providing sufficient housing, or not providing a sufficient range of types and sizes of housing to meet local needs. The HBF is also concerned that additional benefits associated with new housing development have not been considered, including the more people and families to support local services and amenities and benefits from any S106 agreements but also emerging policy requirements such as Biodiversity Net Gain.

Q6c. What evidence is there that the Climate Change emergency justifies the need to provide homes in the City and Inner HMCAs in preference to other HMCAs?

18. The HBF does not consider that there is evidence that the climate change emergency justifies the need to provide homes in the City and Inner HMCAs. In fact, the HBF is concerned that this focus could lead to an inappropriate mix of housing being provided, which could lead to certain households looking to move out the area and instead commuting for longer distances which could lead to an increased need to travel and greater emissions and could have significant implications for climate change. The HBF is also concerned that the Sustainability Appraisal has not given sufficient consideration to the move towards the Future Homes Standard and the changes to the Building Regulations in the interim, which looks to create more energy efficient homes and move the home building industry towards homes that are zero carbon ready, along with the CSSR requirement for Electric Vehicle Charging points.
19. It is noted that Leeds City Council adopted its climate change position in March 2019 and this was considered in the Core Strategy Review adopted in September 2019. The HBF note that SP7 is unchanged.

Q6d. Are the proposed MMs consistent with the aims, objectives and policies in the adopted SAP?

³ Paragraph 62

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20. The HBF considers that the proposed MMs are not entirely consistent with the Vision of the Local Plan which looks for the spatial distribution of growth to be planned and delivered to balance the use of brownfield and greenfield land in a sustainable way, as part of an overall framework promoting development in suitable locations as a basis to meet identified needs. The HBF also considers that they are not in line with the objectives for the Plan which seeks to plan for a sufficient mix, tenure and type of housing to meet a range of community needs including affordable and specialist housing.

Q6e. On what basis was the decision made to extend the plan period to 2028, and does it fulfil the requirements of Policy HGR1 of the SAP? Does this have any implications for the rest of the adopted SAP?

21. Paragraph 1.5 and 1.6 of the SAP identified that the SAP aimed to support the Core Strategy housing requirement up to year 11 of the plan (to 2023) in relation to Green Belt release beyond which a review of the Plan will be undertaken to bring it into line with the housing requirement within the CSSR. However, non-Green Belt allocated and identified sites could continue to make provision for housing to 2028. Other policies in the SAP for example in relation to Safeguarded Land, employment and retail all already ran to a plan period of 2028.

22. The CSSR is now adopted and includes a lower housing requirement than the previous Core Strategy. As part of the MMs the Council now appears to be proposing that the SAP will cover the entire SAP plan period to 2028 but not the entire CSSR plan period which runs until 2033. The HBF does not consider that this examination of the remitted sites meets the requirements of Policy HGR1.

23. Policy HGR1 states that the Site Allocations Plan will be subject of a review during the plan period, to be submitted no later than 31st December 2021, to ensure that sufficient land for housing is allocated and safeguarded land designated so as to comply with the CSSR. There is no suggested modification to remove Policy HGR1. It remains a policy to be complied with and it requires a review to address housing allocations and safeguarded land to meet the CSSR.

Q6f. What evidence is there that the Covid19 pandemic could have an impact on the choices of housing in the future for residents of Leeds?

24. It is well documented that the COVID-19 pandemic has led to many people re-evaluating their housing choices with priorities for city centre living shifting towards the desire for more space. A Place Alliance Report: Home Comforts⁴ (Oct 2020) looks at what can be learnt from the COVID-19 lockdown in terms of the design of our homes and neighbourhoods. The findings, based on a national survey of 2,500 households recommended the need for new homes to have access to private open space and suggests all new homes should be built with provision for people to be able to work comfortably from home.

⁴ <https://placealliance.org.uk/research/researchhome-comforts>.

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25. Aviva's Employee Back to Work Index⁵ included a survey of more than 2,000 employed adults in March / April 2021. This shows that whilst people are more optimistic about returning to work there are still significant numbers (40% of those that are currently working from home) who would look to continue working home at least part of the time. Again, highlighting the need for these people to have somewhere appropriate to work at home.
26. Zoopla's House Price Index (November 2020)⁶ highlights that price growth for houses (4.3%) is more than double that for flats & apartments (1.8%), this difference has continued in the June House Price Index⁷. 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.
27. 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.

Affordable Housing and Housing Mix

Q7a. Has the impact of a shortfall of affordable homes in some HMCA's been adequately assessed when considering the proposed MMs?

28. The HBF does not consider that the shortfall in provision of affordable homes in some HMCA's has been adequately assessed when considering the proposed MMs. The SAP Remittal Background Paper highlights in paragraph 11.7 that if the 37 Green Belt sites were allocated then a total of 904 affordable dwellings would be provided. It goes on to identify that these 904 dwellings would be in the outer northern and outer southern areas where the affordable housing demand is more acute.
29. The Council suggest in paragraph 11.7 that there are policies that would allow for new housing on non-allocated sites and for affordable housing in the Green Belt on exceptions sites. However, there is no assessment as to whether this is realistic, achievable or deliverable. The report does not suggest there are any current proposals for these policies to be utilised in order to deliver affordable homes in these HMCA's. In fact, the SAP Remittal Background Paper identifies an ongoing issue with affordable housing delivery as can 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

⁵ <https://www.aviva.co.uk/risk/solutions/news-and-insights/2021/03/seven-in-ten-workers-feel-optimistic-about-returning-to-work-as/>

⁶ <https://advantage.zpg.co.uk/wp-content/uploads/2020/12/Zoopla-UK-house-price-index-Dec2020-final.pdf>

⁷ <https://advantage.zpg.co.uk/wp-content/uploads/2021/07/UK-House-Price-June-final-1.pdf>

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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 (data from Remittal Background Paper)			
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

Q7b. Is there evidence to indicate that problems associated with the lack of affordable homes has a 'time limited effect' as suggested by the Council?

30. The Council suggest in paragraph 11.15 of the SAP Remittal Background Paper that the mitigation to affordable housing needs provided by the allocation of remitted sites would be time-limited when compared to the permanent effect of Green Belt release. The HBF is not entirely sure what the Council mean by this, as it would be expected that the affordable housing provided (or subsidy/receipts associated) would be retained in perpetuity, in line with the definition of affordable housing in the NPPF which looks for provisions to remain for future eligible households or for subsidy or receipts to be recycled. Therefore, these affordable homes would continue to provide for affordable need on an ongoing basis and therefore it seems inappropriate to consider their impact to be time-limited.

Q7c. What evidence is there that affordable housing would be provided through exceptions sites, section106 agreements or brought forward in Neighbourhood Plans?

31. The HBF does not consider that there is any evidence to suggest that sufficient affordable housing would be provided through exceptions sites, section 106 agreements or brought forward in Neighbourhood Plans.

Q7d. What other sources of affordable homes have been considered and how would they be delivered in the HMCAs outside of the Inner and City HMCAs?

32. The HBF considers that this is a question for the Council.

Q7e. How do the proposed MMs affect the type of housing mix available up to 2028 in the HMCAs and has this been adequately assessed?

33. The 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.
34. As mentioned previously, it is also likely that due to recent circumstances that people's aspirations and needs may have changed from those identified by the 2017 SHLAA, with people seeking more space and additional rooms to work from home, larger

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gardens and access to open space. It is also possible that the delivery of homes since the SHLAA was prepared has led to changes in the existing stock.

35. 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.

Infrastructure and other implications

Q8. What evidence is there that the Green Belt allocations of schools are no longer needed, and that existing school capacity and expansion plans are sufficient?

36. 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.

37. The Council's Report of Consultation suggests that the Council's Children's Service were consulted on the option to remove the school allocations, and that they had advised that the school allocations were identified to accommodate additional school places primarily arising from the new housing within the allocation, and as such would not be needed. The calculations in relation to how this need or not was calculated does not appear to be part of the evidence, so it is not easy to understand how these conclusions have been reached for each area. It is also not clear what impact the provision of any further non-allocated sites or affordable housing exception sites would have on this calculation, particularly as the Council are proosing these as methods to provide additional affordable homes.

Q8a. How does the proposed deletion of the Green Belt allocations for housing and mixed use affect the delivery of other types of infrastructure in the area, including in adjoining authorities?

38. The HBF considers that it would be appropriate for the Council to consider the potential impact of the deletion of the Green Belt allocations on the infrastructure in the area, this could include the loss potential highways improvements, projects from travel plans, provision of open space, green and blue infrastructure and contributions towards the positive management of nature sites.

Green Belt

Q9. Is the approach towards looking at the 37 Green Belt sites as a whole justified, and what is the evidence for this? Were individual site circumstances taken into account at any stage? Was an assessment of the sites in relation to the five purposes of the Green Belt undertaken?

39. The HBF does not wish to comment on the merits of individual sites but does consider that the Council should have considered all reasonable options.

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Q9a. Is there consistency in approach to Green Belt considerations between the deletion of site allocations in MMs1-38 and the proposed addition of a new site allocation MM39?

40. The Council considers that there is evidence to support the release of Green Belt in relation to the employment land availability. It is not apparent if the Council considered other sites other than MM39 to determine if site MM39 was the most appropriate site to be released from the Green Belt in terms of the Green Belt purposes or in order to meet this employment land need.

41. The HBF is also concerned that the Council has been willing to explore the exceptional circumstances in relation to Green Belt release in relation to the employment land availability but it has not taken the time to explore the potential for exceptional circumstances in relation to the affordable housing need, the range and variety of housing needed to meet local needs and the provision of educational and other infrastructure.

Q9b. Some of the remitted site allocations contain brownfield land. Was consideration given to including these areas as site allocations and if so, what assumptions were made?

42. The HBF consider this is a question for the Council. However, the HBF is not aware of any evidence of the Council considering the implications of allocating any brownfield areas within these former allocations.

Q9c. Did the Council consider whether to designate the 37 Green Belt sites as safeguarded land and if so, what is the evidence for this?

43. The HBF considers this is a question for the Council. However, the HBF is not aware of any evidence of the Council considering the potential to designate the 37 sites as safeguarded land. Instead, the Background Paper suggest that safeguarded land falls outside of the scope of the SAP Remittal. Given that these 37 sites were to be released from the Green Belt, it is assumed that the use of these sites would be some of the most preferable in terms of the Green Belt purposes. It would not seem appropriate that a less preferable safeguarded site may come forward before a site that has been considered appropriate for release but is now returned to the Green Belt.

Q9d. How would deleting the site allocations ensure the permanence of the Green Belt in the years from 2028?

44. The deletion of the site allocations does not ensure that permanence of the Green Belt in the years from 2028. Whilst it is agreed it does retain the Green Belt in the short term it does not provide a long-term certainty. It also now creates a confused future picture with safeguarded sites that potentially meet more of the Green Belt purposes than sites that will now remain in the Green Belt.

Q9e. Would exceptional circumstances exist to release the sites from the Green Belt to allocate for housing or mixed use or as safeguarded land?

45. The HBF considers that there are exceptional circumstances which would support the release of sites from the Green Belt. The Council consider that there are exceptional circumstances in relation to the employment land availability, and the HBF considers that there are exceptional circumstances in relation to the affordable housing need, the

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location, range and variety of housing need and aspiration and the provision of appropriate infrastructure, which the Council should have explored further.