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28 June 2018

Dear Helen Wilson,

**LEEDS SITE ALLOCATION PLAN EXAMINATION: INSPECTOR'S MATTERS,
ISSUES AND QUESTIONS**

Thank you for consulting with the Home Builders Federation on the Leeds Site Allocations Plan.

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.

We would like to submit the following comments on selected questions posed within the Inspector's Matters, Issues and Questions.

Yours sincerely,



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Matter 2A – Compliance of the Revised Submission SAP with the Core Strategy (CS)

Issue - whether the Revised Submission SAP gives effect to and is consistent with the CS.

Questions:

The principle of Broad Locations

- 1. Paragraph 2.27 of the Revised Submission SAP explains how the SAP makes provision for 66,000 dwellings in line with Policy SP6. The only mechanism for the release of land in the Broad Locations appears to be through subsequent reviews of the CS and SAP (Policy BL1 sub-section 2). How will the identified Broad Locations therefore make provision during the plan period?**

The HBF cannot see how the Broad Locations will make any provision within the plan period, therefore, the text within paragraph 2.27 is not considered to be appropriate.

- 2. What is the purpose of Broad Locations in the context of delivering the housing requirement and allocations of housing land as set out in the Core Strategy, and is the identification of Broad Locations consistent with Policy SP6 of the CS?**

The HBF cannot see how the Broad Locations will make any provision within the plan period, therefore, the current document is not considered to be consistent with Spatial Policy 6 of the Core Strategy.

- 3. Having regard to Q1 and Q2 above what does Policy BL1 achieve in the context of the adopted CS?**

The HBF does not consider that policy BL1 is in line with the Core Strategy. The Broad Locations do not contribute to the housing provision within the current plan period. There is no method identified to bring these sites forward within the plan period, instead the Broad Location sites will require a further plan to be prepared. The HBF have concerns given the time taken to prepare the current site allocations document that this approach will not deliver the necessary homes set out in the Core Strategy.

- 4. Is Policy BL1 justified, and will it be effective?**

The HBF do not consider BL1 to be justified or effective. It will not deliver homes. It will not contribute to the Core Strategy housing requirements as set out in SP6, as is stated in paragraph 1 of the policy. As the policy still identifies that the broad locations could be deleted on production of a plan review, it provides no certainty to developers or land owners and potentially leaves these sites with an uncertain future and potentially increases the time it may take to bring these sites forward should they be needed.

- 5. Is there inconsistency between sub-section 1 and 2 of Policy BL1 in that the former indicates that the Broad Locations will contribute to the CS housing requirement but the latter refers to broad locations remaining in the Green Belt until 'following a future review of the plan'?**

The HBF consider that there is a clear inconsistency between sub-section 1 and 2 of the policy, as it is evident that the broad locations will not contribute to the housing provision within the current plan period.

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- 6. As all the identified sites and allocated sites are included in Phase 1 and there is no mechanism to release Broad Location sites, is the reference to phasing misleading?**

The HBF consider that the reference to phasing is misleading and no longer appropriate. There are no phases identified and broad locations do not contribute to the housing requirement within the plan period.

- 7. If Broad Locations will remain in the Green Belt at least until such time as there has been a future review of the Plan, how should the soundness of their inclusion in the Revised Submission SAP be assessed?**

The HBF do not consider that these sites should remain within the Green Belt. If they are to remain in the Green Belt and no certainty is to be provided as to their development in the future, there seems little point in assessing their soundness. The HBF consider that the sites should contribute to the housing requirement, that they should be released from the Green Belt and that their soundness should be assessed to ensure that they are the appropriate sites.

- 8. What would be the soundness implications, if any, of the Revised Submission SAP if the Broad Locations were deleted, in light of the commencement of a CS review?**

The HBF do not consider that it is appropriate to delete the sites identified as Broad Locations, as this will not deliver the housing requirement identified in the Core Strategy. The HBF consider that these sites should be released from the Green Belt within this plan period to ensure that the sufficient housing land supply to provide the housing required to meet the Core Strategy requirement. There may be potential to include a phasing mechanism around these sites, potentially related to the provision of a 5-year housing land supply or delivery of the housing requirement.

The Core Strategy Review remains an emerging document, the housing requirement contained within this document has not been tested and may not be considered sound. The HBF have concerns that the proposed housing requirement does not represent the OAN identified within the Council's own evidence particularly with reference to the economic growth scenarios considered.

- 9. Is the Revised Submission SAP sufficiently flexible and resilient enough should the identified and / or allocated sites fail to deliver at the level and pace envisaged?**

The HBF do not consider that the Revised Submission SAP provides sufficient flexibility to deliver should the identified and allocated sites fail to deliver at the level and pace envisaged.

The Council have well documented issues with housing delivery, with only 13,824 dwellings completed in the six-year period of 2012/13 to 2016/17. Well below the 18,300 dwellings that should have been completed based on the 3,660 dwellings proposed in policy SP6, and significantly below the 21,875 dwellings based on the overall housing requirement. The HBF consider that the reduction in allocations and the introduction of Broad Locations will only increase these issues with housing land supply and will do nothing to positively contribute to the delivery of housing and the local plan as a whole.

- 10. Is the distribution and capacity of housing sites identified in the Revised Submission SAP in accordance with the CS (Policies SP1 and SP7)? In particular, where the**

requirements set out in Table 3 of the CS are not met in some Housing Market Characteristics Areas (HMCAs) is this justified?

The HBF would expect the distribution of housing land to be planned in line with Policy SP7 of the Core Strategy unless there is a clear justification as to why this is not appropriate.

- 11. Having regard to the need for realistic lead-in times and build out rates for construction is a single phase for housing and mixed use development justified, and will it be effective in the context of the housing requirement of the CS and to ensure the delivery of the housing trajectory?**

The HBF consider that a single phase for housing and mixed-use development is appropriate. The HBF consider that the given the issues the authority has previously had with delivery of the housing requirement that the Council will have to monitor the delivery to ensure that it is able to meet the housing requirement and the housing trajectory.

- 12. Is the approach to the release of sites in the Revised Submission SAP consistent with Policy H1 of the CS?**

The HBF does not wish to comment on individual sites and would assume that the Council has determined that the release of sites is consistent with Policy H1 of the Core Strategy.

- 13. Is there a consistent approach to bringing sites forward into Phase 1 across the HMCAs? (See Appendix 1 for relevant sites). For example BL1-9 (formerly HG2-10) site is identified as having less impact on GB purposes than other sites in the HCMA but has been identified as a Broad Location in relation to heritage matters.**

The HBF does not wish to comment on individual sites, and as such does not wish to comment on this question.

- 14. What are the implications of the identification of Broad Locations in relation to the delivery of Policy H4 (Housing Mix) and Policy H8 (Independent Living) of the CS?**

The HBF would expect the Council to continue to ensure that an appropriate mix of dwelling types and sizes is provided, creating a housing market that is attractive to investors and provides an element of aspiration to ensure working people and families are retained within the area.

Matter 3A - Green Belt

Issue – Is the Council’s approach to the Green Belt in the Revised Submission SAP robust and consistent with the CS.

Questions:

1. ***Is the identification of Broad Locations in the Revised Submission SAP justified in light of the need for a comprehensive review of Green Belts as set out in the CS?***

The HBF do not consider that the identification of Broad Locations in the Revised Submission SAP is justified in light of the need for a comprehensive review of Green Belt as set out in the Core Strategy.

The HBF consider that the Revised Submissions SAP should identify sufficient sites to deliver the housing requirement set out in the Core Strategy and sites should be released from the Green Belt as appropriate.

2. ***Is it necessary to determine whether exceptional circumstances exist in considering the soundness of identifying Broad Locations in the Green Belt?***

If the Broad Locations are to remain within the Green Belt and a Local Plan review will be required before the sites are to be allocated for development then it is not considered necessary to determine whether the exceptional circumstances exist in considering their soundness. However, if the Broad Locations are to become a useful designation that will contribute to the housing requirement then it is considered appropriate to determine the exceptional circumstances.

3. ***Is the approach to Broad Locations consistent with paragraph 85 of the National Planning Policy Framework (NPPF) and consistent with requirements of the criteria set out in Policy SP10 of the CS?***

Paragraph 85 of the NPPF does not make any reference to Broad Locations or similar designations, it does however, make it clear that local planning authorities need to satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period. However, it is evident that the Council intend for the Broad Locations designation to do exactly that and therefore it is not consistent with paragraph 85.

Spatial Policy 10 states that a review of the Green Belt will be carried out to accommodate the scale of housing and employment growth identified. Again it is clear that the proposed broad locations do not allow for the scale of housing proposed to be accommodated within the plan period.

4. ***Is it appropriate to identify Broad Locations on land to be retained as Green Belt given that any future proposals would, as a consequence, still be regarded as inappropriate development?***

The HBF do not consider that it is appropriate to identify Broad Locations on land to be retained as Green Belt. The HBF consider that the Revised Submissions SAP should identify sufficient sites to deliver the housing requirement set out in the Core Strategy and sites should be released from the Green Belt as appropriate.

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5. ***Is the approach to Green Belt site selection in the Revised Submission SAP consistent with the overall site selection process?***

The HBF do not wish to comment the selection of individual sites.

6. ***Is the identification of Broad Locations consistent with paragraph 83 of the NPPF in the context that the Green Belt boundaries contained in the Revised Submission SAP will almost certainly not endure beyond the plan period by virtue of Policy BL1?***

Paragraph 83 of the NPPF does not make any reference to Broad Locations or similar designations, it does however, make it clear that Green Belt boundaries should only be altered in exceptional circumstances and that the boundaries should have regard to their intended permanence in the long term and be capable of enduring beyond the plan period. However, it is evident that the Council do not intend for the Green Belt boundaries to have permanence in the long term or to endure beyond the plan period.

7. ***Will the principle of Broad Locations ensure the permanence of Green Belt boundaries?***

The HBF do not consider that the principle of Broad Locations will ensure the permanence of the Green Belt boundaries.

8. ***Is the release of Broad Locations before safeguarded land in a number of HCMA's justified?***

The HBF consider that in terms of the current standing of their proposed designations that it would not be appropriate for Broad Locations to be released before the safeguarded land. However, as the HBF do not consider that the broad location designations are appropriate, it is considered that the sites should be released from the Green Belt and if considered necessary phased as is appropriate given their suitability for development.

9. ***Some suggest that the BLs should in fact be safeguarded land. To do this, would it be necessary to release the areas identified from the Green Belt?***

If Broad Locations are to be identified as safeguarded land, then it would be necessary to release them from the Green Belt.

10. ***What is the justification for including safeguarded sites as Broad Locations? (See Appendix 2 for relevant sites).***

The HBF does not wish to comment on this question.

11. ***Where existing safeguarded land has not been selected for development, is it appropriate for such sites to be retained as safeguarded land?***

If the sites are necessary in order to meet the longer-term development needs stretching beyond the plan period, then it is considered that these sites should continue to be identified as safeguarded land.

12. ***Have sufficient new safeguarded sites have been identified in the Revised Submission SAP?***

Policy HG3 Table 4 appears to identify sites with capacity for 5,383 dwellings, this is not considered sufficient sites to ensure the endurance and long-term permanence of the Green Belt boundaries. Safeguarded sites are not intended to meet current need they are intended to meet future needs, taking into consideration that the Core Strategy housing requirement is

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equivalent to 4,375 dwellings each year, a higher level of safeguarded would be expected, in order to meet longer-term development needs stretching well beyond the plan period.

The Core Strategy suggests that 10% of the total land identified for housing would be identified as Protected Areas of Search, this has been taken as 6,600 as identified by the Council. The Council is intending to meet this requirement through both safeguarded sites and the broad locations.