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SENT BY EMAIL  
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26/06/2019

Dear Sir / Madam,

## **LEEDS CORE STRATEGY SELECTIVE REVIEW: MAIN MODIFICATIONS**

Thank you for consulting with the Home Builders Federation on the Leeds Core Strategy Selective Review Proposed Main Modifications.

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.

The HBF would like to comment on a selection of the proposed modifications as follows.

### **MM7- Para 5.2.20**

The HBF support the amendments to paragraph 5.2.20, which add clarity and are considered more in line with national planning policy.

### **MM8 – Policy H5**

The HBF support the Council in making reference to viability considerations within the policy.

However, as raised by HBF members at the examination there are concerns in relation to the need for affordable units to be provided on a pro-rata mix in relation to the sizes and house types of the total housing provision, and the types of evidence that would be required to demonstrate that there are 'specific needs which indicate otherwise'. It is not clear if the pro-rata mix would be appropriate in terms of local needs and the impact this may have on the viability of development. The HBF are

disappointed that the Council have not taken the opportunity to give further consideration to this element of the policy.

#### **MM12 – New Paragraph**

The HBF support the Council in adding an additional paragraph in relation to viability.

#### **MM13 – Policy H9**

*The HBF does not consider this modification to be sound as it not considered to be justified, effective or consistent with national policy.*

As has been set out throughout our responses the HBF do not consider that the introduction of the NDSS is appropriate within Leeds and do not consider that the need for these standards has been proven.

#### **MM14 – Policy H9**

The HBF support the inclusion of additional wording in relation to viability within the policy.

#### **MM16 – Paragraph 5.5.52 and Policy H10**

The HBF support the amendments to paragraph 5.5.52 and Policy H10 in relation wheelchair adaptable and accessible housing.

#### **MM17 – New paragraph**

The HBF support the Council in adding an additional paragraph in relation to viability.

#### **MM20 – Policy H10**

*The HBF does not consider this modification to be sound as it not considered to be justified, effective or consistent with national policy.*

As raised by HBF members at the examination there are concerns in relation to the need for M4(2) and M4(3) homes to be provided to reflect the mix of sizes, types and tenures of the development as a whole. Whilst the amended text is an improvement it remains unclear how the applicant will be expected to demonstrate an evidence need to provide accessible homes of a particular size, type or tenure. The HBF are disappointed that the Council have not taken the opportunity to give further consideration to this element of the policy.

However, the HBF support the inclusion of additional wording in relation to viability within the policy.

#### **MM26 – Policy EN8 i)**

*The HBF does not consider this modification to be sound as it not considered to be justified.*

As raised by HBF members at the examination, there are concerns in relation to the need for 1 charging point per parking space. This is considered unnecessary, and unjustified.

#### **Future Engagement**

I trust that the Council and the Inspectors will find these comments useful as they continue to progress the CSSR to adoption. I would be happy to discuss these issues

in greater detail or assist in facilitating discussions with the wider house building industry.

The HBF would like to be kept informed of the publication of the Inspector's report and the adoption of the Local Plan and associated documents. 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**

**Local Plans Manager – North**

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