



## DEVELOPMENT PLAN PANEL

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Meeting to be held in Civic Hall, Leeds, LS1 1UR on  
Tuesday, 19th May, 2015  
at 1.30 pm

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### MEMBERSHIP

#### Councillors

R Charlwood  
M Coulson  
P Gruen  
J Lewis  
J McKenna  
N Walshaw  
(Chair)  
Vacancy

C Campbell

B Anderson  
J Procter

T Leadley

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**Agenda compiled by:  
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Civic Hall  
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# A G E N D A

Item No	Ward	Item Not Open		Page No
1			<p><b>APPEALS AGAINST REFUSAL OF INSPECTION OF DOCUMENTS</b></p> <p>To consider any appeals in accordance with Procedure Rule 15.2 of the Access to Information Rules (in the event of an Appeal the press and public will be excluded)</p> <p>(*In accordance with Procedure Rule 15.2, written notice of an appeal must be received by the Head of Governance Services at least 24 hours before the meeting)</p>	
2			<p><b>EXEMPT INFORMATION - POSSIBLE EXCLUSION OF THE PRESS AND PUBLIC</b></p> <p>1 To highlight reports or appendices which officers have identified as containing exempt information, and where officers consider that the public interest in maintaining the exemption outweighs the public interest in disclosing the information, for the reasons outlined in the report.</p> <p>2 To consider whether or not to accept the officers recommendation in respect of the above information.</p> <p>3 If so, to formally pass the following resolution:-</p> <p><b>RESOLVED</b> – That the press and public be excluded from the meeting during consideration of the following parts of the agenda designated as containing exempt information on the grounds that it is likely, in view of the nature of the business to be transacted or the nature of the proceedings, that if members of the press and public were present there would be disclosure to them of exempt information, as follows:</p>	

Item No	Ward	Item Not Open		Page No
3			<p><b>LATE ITEMS</b></p> <p>To identify items which have been admitted to the agenda by the Chair for consideration.</p> <p>(The special circumstance shall be specified in the minutes).</p>	
4			<p><b>DECLARATION OF DISCLOSABLE PECUNIARY INTERESTS</b></p> <p>To disclose or draw attention to any disclosable pecuniary interests for the purposes of Section 31 of the Localism Act 2011 and paragraphs 13-16 of the Members' Code of Conduct</p>	
5			<p><b>APOLOGIES FOR ABSENCE</b></p>	
6			<p><b>MINUTES</b></p> <p>To approve the minutes of the Development Plan Panel meetings held on:  16<sup>th</sup> December 2014  6<sup>th</sup> January 2015  13<sup>th</sup> January 2015</p> <p>(minutes attached)</p>	1 - 24
7			<p><b>IMPLICATIONS OF THE 2012-BASED HOUSEHOLD PROJECTIONS ON THE CORE STRATEGY HOUSING REQUIREMENT</b></p> <p>To receive and consider the attached report of the Chief Planning Officer</p>	25 - 42
8			<p><b>HOUSING PHASES</b></p> <p>To receive and consider the attached report of the Chief Planning Officer</p>	43 - 54
9			<p><b>GYPSIES, TRAVELLERS &amp; TRAVELLING SHOWPEOPLE SITE ALLOCATIONS PROGRESS UPDATE</b></p> <p>To receive and consider the attached report of the Chief Planning Officer</p>	55 - 66

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10			<p><b>HOMES FOR OLDER PEOPLE</b></p> <p>To receive and consider the attached report of the Chief Planning Officer</p>	67 - 76
11			<p><b>DATES AND TIMES OF NEXT MEETINGS</b></p> <p>Wednesday 20<sup>th</sup> May 2015 at 9.30am  Tuesday 16<sup>th</sup> June 2015 at 1.30pm  Wednesday 24<sup>th</sup> June 2015 at 1.30pm</p>	

**Third Party Recording**

Recording of this meeting is allowed to enable those not present to see or hear the proceedings either as they take place (or later) and to enable the reporting of those proceedings. A copy of the recording protocol is available from the contacts named on the front of this agenda.

Use of Recordings by Third Parties– code of practice

- a) Any published recording should be accompanied by a statement of when and where the recording was made, the context of the discussion that took place, and a clear identification of the main speakers and their role or title.
- b) Those making recordings must not edit the recording in a way that could lead to misinterpretation or misrepresentation of the proceedings or comments made by attendees. In particular there should be no internal editing of published extracts; recordings may start at any point and end at any point but the material between those points must be complete.

## Development Plan Panel

Tuesday, 16th December, 2014

**PRESENT:** Councillor N Walshaw in the Chair

Councillors B Anderson, C Campbell,  
R Charlwood, P Gruen, T Leadley, J Lewis,  
J McKenna, K Mitchell and J Procter

### **8 Chair's opening remarks**

The Chair welcomed everyone to the meeting and asked Members and Officers to introduce themselves

### **9 Late Items**

There were no formal late items, however the Panel was in receipt of revised plans in respect of Plan 1 Aire Valley Leeds AAP Draft Policies Map – December 2014 (proposed allocations and green space ) and Hunslet Town Centre – Plan 4 (minute 9 refers). These plans had been sent to Members and published on the Council's website in advance of the meeting

### **10 Declaration of Disclosable Pecuniary Interests**

There were no declarations of disclosable pecuniary interests

### **11 Minutes**

**RESOLVED** - That the minutes of the Development Plan Panel meetings held on 12<sup>th</sup> May 2014 and 17<sup>th</sup> June 2014 be approved, subject to the amendment of minute 5 of the meeting held on 17<sup>th</sup> June 2014, to state 'that sometimes small sites could deliver more than 5 units'

### **12 Safeguarded Land / Protected Areas of Search (PAS)**

Members considered a report of the Chief Planning Officer on issues relating to Safeguarded Land/Protected Areas of Search (PAS), arising from work undertaken in the Member workshops. The Head of Forward Planning and Implementation presented the report which set out the overall methodology for the provision of PAS land as part of the Site Allocations Plan workshop sessions and sought consideration of whether or not existing PAS sites which were not proposed for allocation, could be returned to the Green Belt

As the Core Strategy established that new PAS should account for at least 10% of the total land identified for housing over the Plan Period, consideration had been given as to how to take this forward. As some areas could not accommodate PAS, other areas would need to take more than a 10% share, with Officers using a figure of 19% as a working assumption

Draft minutes to be approved at the meeting to be held on 19<sup>th</sup> May 2015

Members discussed this with the main issues being raised relating to:

- the percentage rates for PAS and when these would be available
- the figure of 19%; where this had emanated from whether the table in paragraph 3.9 of the submitted report had validity in view of some PAS figures being as high as 30%
- the rationale for the figure of 19%
- the way in which this had been conveyed to Members
- concerns that some Councillors would be surprised at the PAS figures for their wards
- the possibility of finding land to be designated as PAS in many areas
- the need for clarity and transparency
- the information provided to Elected Members in the workshops
- the possibility of considering PAS sites later than the meeting scheduled on 13<sup>th</sup> January
- the need to consider carefully those Green Belt sites which were close to the boundaries with neighbouring authorities in order to avoid massive coalescence
- the make-up of the figures and that brownfield sites with consents coming forward after the Plan Period should be taken account of

The following responses were provided

- that the PAS figures would form part of the information to be considered by Development Plan Panel at its meetings in January
- that the figure of 19% was an arithmetic calculation by Officers, presented to Members as a response to addressing the fact that some areas could not accommodate PAS land. Whilst a figure of 10% could have been used, there would have been a shortfall (within the context of the definition of safeguarded land set out in national planning guidance)
- that there had been little change since the workshops with Elected Members, other than changes subject to further discussion with Ward Members, so there should be few surprises once the information was made available
- that the fairest and most equitable way, given the limitations of some areas to find PAS land was being proposed
- that consideration of the Housing and PAS sites on 13<sup>th</sup> January would enable Executive Board to consider the material in the round, with a view to Officers preparing a draft plan for public consultation later in 2015
- the importance of retaining identity and to avoid coalescence; that Green Belt boundaries of neighbouring Local Authorities were being kept under consideration but there were difficulties as some Authorities were at different stages in the Development Plan process, however progress was being monitored in Leeds via the Duty to Co-operate process
- that brownfield sites with consents were implicitly taken into account as there would always be recycling of land in the main urban areas

The Head of Forward Planning and Implementation then outlined the

second part of the report which related to returning PAS land to Green Belt. He outlined the position in respect of the tests set out in national guidance and recent court cases. Members were informed the process was very challenging and that if a site was returned, it would be necessary to replace that site with another one, therefore this would have an impact on the totals in the Housing Market

#### Characteristic Areas

In respect of the future status of rural land, Members were informed there was some merit in exploring designating the UDP Rural Land area as Green Belt, although it would be necessary to satisfy the tests

The Panel discussed this element of the report, with the key areas of debate concerning:

- Government statements on Green Belt
- the need to review the Green Belt which was a separate process from the Site Allocations process
- that a proper review of Green Belt should be undertaken
- that consideration should be given to revising some sites which were removed by the Inspector and where this had been the wrong decision

At this point the Head of Regulatory and Development outlined the way returning Safeguarded Land to the Green Belt was being viewed by the courts and referred to recent judgements and the high test which needed to be met for a successful outcome

Members commented further on this matter, in respect of:

- the need to challenge decisions rather than just accepting them
- that it was possible to return land to the Green Belt
- the need to know when the total review of the Green Belt would commence and conclude

Officers advised that the position was that a review of the Green Belt was required to accommodate development; the scope of the review being in SP10 and that this was being worked through currently

The Executive Member Neighbourhoods, Planning and Personnel thanked Officers for their comments and stated the Inspector had not indicated a review of the Green Belt had to be undertaken at this stage and that if one was undertaken it would be necessary to do this properly with terms of reference, Member involvement and public consultation. On the issue of returning PAS to Green Belt, clear legal advice had been provided. In respect of the extent of PAS land a further report which clarified the issues was required to be presented to Panel in January. In respect of informing Members where different percentage rates were to be considered, Officers had been asked to speak to Members in those wards which would be affected

**RESOLVED** - To note the report and the comments now made and that a further report setting out the clear position in respect of PAS land be provided to Members at their meetings in January

### 13 Aire Valley Area Action Plan - Site Proposals

The Panel considered a report of the Chief Planning Officer in respect of site allocations for the Aire Valley Leeds Area Action Plan

Officers presented the report and outlined main issues in respect of housing; housing and mixed use allocations; employment; office sites; green space and retail

Large scale plans were tabled at the meeting

Members discussed and commented on the report, with the key issues relating to:

- a specific Green Belt site and whether that could be retained as PAS land
- possible uses for the Skelton Gate site
- the number of housing units required in this area; where this figure had been derived from and who had proposed sites
- the requirements of the Core Strategy in terms of employment use and job creation and that a lower housing figure would have translated into lower employment and job creation targets
- concerns that potential housing sites were being disregarded and that decisions taken by Plans Panels for sites were also not being reflected in the information before Members
- the SHLAA process and the correct forum for consideration of housing sites
- employment land and the way in which this had been dealt with
- the need for improvements to green space in Richmond Hill
- the need to prioritise green space provision in the areas of East End Park and Hunslet
- the level of masterplanning carried out for the Skelton Gate site and the housing density proposed

In view of the issues raised by Members, further work on the site proposals for the Aire Valley Leeds Area Action Plan was requested to be brought back to Panel, this being:

- clarification of the proposed use of the site at Cross Green, cross hatched on the submitted plan
- including provision of green space for Richmond Hill, East End Park and Hunslet as a key objective
- a review of the sites listed in Appendix D and to contact those landowners with sites listed in this appendix to ascertain if they still wished for their sites to be considered for housing use
- the consistency of the Skelton Gate site and further information on the housing density and the buffer which would be required
- information from Children's Services on school places and how it relates to housing numbers

**RESOLVED** - To note the report and the information provided and that Officers consider the matters raised, with a view to reporting back to Development Plan Panel Members at future meetings

#### **14 ODD (Otley Development Disgrace) Open Letter & Petition Response**

The Panel considered a report of the Chief Planning Officer setting out a response which had now been sent following a petition and letter received from the ODD campaign group in respect of implications for Otley in the Site Allocations Plan. A copy of the letter and response were appended to the report

The difficulties of obtaining statistical data to support Neighbourhood Plans was raised, with the Chair offering assistance with this



The changing nature of communities and population growth was highlighted as was the need for a piece of work to be undertaken at a future date to consider population shifts and project likely future movement

**RESOLVED** - To note the report and the response to the ODD petition and letter

### **15 Planning Policy Approach to Hot Food Takeaways (HFTs)**

Members considered a report of the Chief Planning Officer which provided an overview of the planning policies in Leeds relating to hot food takeaways, in response to issues raised through the Members workshops

The Core Strategy context was outlined with the requirement to provide a planning policy framework to address health issues and the wider role of local authorities through the Duty to improve Public Health

The relevant planning policy was UDP Policy GP5, with the Head of Forward Planning and Implementation stating that it was necessary for the policy to be applied in order to assess how effective it was and be kept under review

Members discussed issues relating to hot food takeaways in respect of their impact on health, obesity and life expectancy; the numbers of hot food takeaways in particular parts of the city: the frequent siting of these close to schools and the need for Officers to robustly apply and defend the policy

It was suggested that this report be referred to the Joint Plans Panel and Community Committees

**RESOLVED** - To note the report and the approach to hot food takeaways and the need for the application of relevant policies to be kept under review

### **16 Closing remarks**

The Executive Member, Neighbourhoods, Planning and Personnel, referred to the meetings scheduled for January thanked Officers for their efforts and team work in preparing material for the next stage of the process

A further presentation was offered to the opposition groups in their group meetings, if this would be useful

### **17 Date and Time of Next Meeting**

Tuesday 6<sup>th</sup> January 2015 at 1.30pm in the Civic Hall, Leeds

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## **Development Plan Panel**

**Tuesday, 6th January, 2015**

**PRESENT:** Councillor N Walshaw in the Chair

Councillors B Anderson, C Campbell,  
R Charlwood, M Coulson, P Gruen,  
T Leadley, J Lewis, J McKenna, J Procter  
and C Towler

### **18 Chair's opening remarks**

The Chair welcomed everyone to the meeting, particularly Tim Hill, the new Chief Planning Officer and asked Members and Officers to introduce themselves for the benefit of the public in attendance

### **19 Late Items**

There were no formal late items, however the Panel was in receipt of supplementary information which had been published and circulated prior to the meeting. Members also received an addendum in respect of the employment sites which set out minor corrections to a number of comments within the papers before Panel (minute 22 refers)

### **20 Declaration of Disclosable Pecuniary Interests**

There were no declarations of disclosable pecuniary interests

### **21 Apologies for Absence**

Apologies for absence had been received from Councillor Mitchell who was substituted for by Councillor Towler

### **22 Site Allocations Plan - Site Allocation Proposals (Employment, Green Space and Retail)**

The Panel considered a report of the Chief Planning Officer seeking consideration and agreement of the site allocations in respect of employment, green space and retail uses as a basis to prepare a Publication Draft Site Allocations Plan for formal consultation in 2015

The Head of Forward Planning and Implementation introduced the report and set out the context of the proposals in relation to the Core Strategy which had been adopted in November 2014. He stressed that at this stage, the proposals for site allocations would not form a plan but were the next step to preparing a draft plan which would then go out for public consultation, following consideration by the Council's Executive Board

The Panel firstly considered the proposals for employment site allocations, including those in the Aire Valley. Large scale plans were provided and graphics and photographs of particular sites were displayed

Members were informed of the level of employment sites with planning permission and the level of proposed allocations including mixed use, which would

exceed the targets set out in the Core Strategy. However there was the possibility that some of these sites would be lost, through further detailed work and the need for housing land and that the 24 hectares of surplus sites for general employment, above the District wide target, was a relatively small margin

The Panel discussed the proposed site allocations for employment use, with the main issues relating to:

- Thorp Arch which was considered to be a suitable site for employment uses and was previously developed land but was being considered for housing use, if used for housing this would result in the potential for Green Belt land being needed elsewhere to provide employment sites
- the need to consider carefully the impact of any proposals at the Thorp Arch site in view of its proximity to two village communities
- that some brownfield sites allocated for employment use would be better allocated for housing use
- the figure for employment within the Core Strategy and that a lesser figure would have resulted in a lower figure for housing delivery
- that an oversupply of employment sites at this stage was better than under provision
- Nepshaw Lane Gildersome, which remained as an employment site allocation; concerns about the numerous attempts to bring the site forward for development; the views of Ward Members and Gildersome Parish Council that housing use was preferred and the possibility of Development Plan Panel changing the allocation of the site. The Executive Member, Neighbourhoods, Planning and Personnel suggested that the most appropriate way would be for Officers to consider this particular site further and provide more information to a future meeting
- the need for a pragmatic approach to site allocation, particularly in view of some sites which had been allocated 20 years ago and had still not come forward for development
- a lack of connectivity within City Development leading to sites being allocated for employment use and then applications being brought to Plans Panels for different uses and the need to afford some protection to existing sites
- Leeds Bradford International Airport (LBIA); the need to clarify the position in respect of this so residents could have an understanding of any proposed alterations; concerns that LBIA had not adhered to the timetable and that some leeway was being afforded to the operators and whether this would apply to all land owners
- site allocations in the Aire Valley and that issues relating to employment sites and housing sites would be raised at the meeting considering housing and PAS site allocations

Arising out of the discussions, additional information was provided, which included:

- Nepshaw Lane – that for the whole site to be given over to housing would lead to a shortfall of 6 hectares of employment land; that the oversupply of employment land was not generous and equated to less than one year's worth of employment land and that an enclave of

housing adjacent to a large industrial estate and main roads might not be the most suitable place for a residential development

- regarding sites allocated for employment being used for housing, due to the way in which national planning guidance was structured meant that it would be difficult to hold on to employment land when it was required for housing. However through policies within the Core Strategy, employment sites would be afforded a level of protection as there was the need to supply employment requirements for the City and within the Core Strategy there was also a policy on protecting local employment
- that in terms of additions and deletions, it was important to have a balanced portfolio
- that discussions were ongoing with LBIA about possible future growth; there were no definitive proposals for further employment land at the site and that the draft SAP would provide greater clarity
- that there were gaps in the proposals as this was an evolving process and that by the time the draft SAP was produced, there would be a requirement to have tied up all of the loose ends which currently existed

Prior to concluding discussion on the proposed employment site allocations, the Deputy Chief Planning Officer stated that Officers wished to give further consideration to the site at Topcliffe Lane Morley (ref CFSM010) in respect of the boundary of that site

The Panel then considered the proposals for green space allocations, with larger scale maps being provided

The Head of Forward Planning and Implementation informed Members of correspondence which had been received from the Friends of Allerton Grange Fields which whilst generally supporting the proposals had raised issues in respect of the mapping. Members were informed that Officers would meet with the organisation to discuss their concerns. Officers were also asked to check the Yorkshire Bank sports ground and the green space which would remain after an approved residential development had been completed

Members were informed that many but not all of the UDP green space sites remained protected; that some sites had been reviewed in light of comments which had been received and that some typologies had also changed. If all of the sites shown as protected remained, there would be a 50% increase in green space. Once the housing allocated sites had been considered, the green space typologies for all 33 Wards would be carried out

It was stated that although it had been agreed that private golf courses would not be included on the plans, three had been put on in error, but these had subsequently been removed from the latest plans

In respect of site 635 – land rear of this site should have been deleted as its use was agricultural

Regarding land at Weetwood Avenue – housing site 3376 – this site had previously identified as green space but was considered to have potential for housing, with scope for development to help fund improvements at Headingley cricket and rugby ground. Members were informed that representations had been received on this, with Councillor S Bentley expressing surprise at this allocation and objecting to housing use, and Councillor Campbell having queried the allocation

The Panel discussed the proposed site allocations for employment use, with the main issues relating to:

- land at Weetwood Lane; that during the workshops, Members had undertaken a site visit and had been clear that the site should be retained as green space and that no rationale had been provided to support the allocation for housing; that Panel was being asked to agree to development on a vague promise of some benefit to sporting venues and that Headingley Stadium was in a different ownership and there could be no guarantee of such a link being forged, or adhered to
- clarification on why the decision to allocate the site for housing had been taken, with concerns being expressed about the approach being taken in this case

The Executive Member, Neighbourhoods, Planning and Personnel stated that the site was included in the schedule of housing sites to be considered at the Development Plan Panel meeting on 13<sup>th</sup> January, that context would be provided and that the appropriate Ward Members had been consulted on site 3376 and were aware of this change

An amendment seeking designation of housing site 3376 as green space was made and seconded but did not find majority support

Members then considered the proposals for retail use and were informed of late, minor alterations to the proposals for Cardigan Road, which had arisen from discussions with Headingley Neighbourhood Forum, with these being outlined to Panel

Discussion on the proposed amendments took place with concerns being raised about the extension of the primary frontage boundary to take in a former residential dwelling which had been converted to an estate agents. Officers advised that the change was permissible in the NPPF if that was required but the view was that commercial was the most appropriate use for that particular unit

The Panel considered how to proceed

The Chair noted that some opposition Members had chosen to reserve their position in respect of the matters under consideration

**RESOLVED** – To note the comments now made and:

- i) to agree the site allocations proposals set out in the report, and the proposed amendments to the retail allocation proposals for Cardigan Road and subject to further consideration of the employment site at Nepshaw Lane and reconsideration of the boundary of the site at Topcliffe Lane and recommend to Executive Board that these provide a basis to prepare a Publication draft Plan for deposit in 2015
- ii) to note, as set out in paragraph 2 of the submitted report, that following completion of more detailed work in relation to the proposals outlined, together with work in relation to outstanding matters, further consideration by Development Plan Panel will be needed in the preparation of the emerging Plan
- iii) to note that the proposals are not being agreed for public consultation at this stage but that they will be subject to public consultation later in 2015

## **23 Date and Time of Next Meeting**

Draft minutes to be approved at the meeting to be held on 19<sup>th</sup> May 2015

Tuesday 13<sup>th</sup> January 2015 at 1.30pm in the Civic Hall

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## **Development Plan Panel**

**Tuesday, 13th January, 2015**

**PRESENT:** Councillor N Walshaw in the Chair

Councillors B Anderson, C Campbell,  
R Charlwood, M Coulson, P Gruen,  
T Leadley, J Lewis, J McKenna, K Mitchell  
and J Procter

### **24 Chair's opening remarks**

The Chair welcomed everyone to the meeting and thanked the large number of public who were in attendance for their interest in the issues to be considered

The Chair stated that no decisions would be taken on site allocations at the meeting, instead, the Panel would make recommendations which would be forwarded to Executive Board for consideration, prior to further, detailed work being undertaken to produce a draft site allocations plan which would then go out to public consultation

### **25 Exempt Information - Possible Exclusion of the Press and Public**

**RESOLVED** - That the public be excluded from the meeting during consideration of the following part of the agenda designated exempt on the grounds that it is likely, in view of the business to be transacted or the nature of the proceedings, that if members of the public were present there would be disclosure to them of exempt information as designated as follows:

Supplementary information in respect of site 3376 – Weetwood Avenue Headingley, referred to in minute 28 under Schedule 12A Local Government Act 1972 and the terms of Access to Information Procedure Rule 10.4(3) and on the grounds that it contains information relating to the financial or business affairs of any particular person (including the authority holding that information). It is considered that if this information was in the public domain it would be likely to prejudice the affairs of an organisation external of the Council. Whilst there may be a public interest in disclosure, in all the circumstances of the case, maintaining the exemption is considered to outweigh the public interest in disclosing this information at this time

### **26 Late Items**

There were no formal late items, however the Panel was in receipt of supplementary information in respect of:

- housing proposals for Aire Valley Leeds
- addendum to Appendix 4 providing a key to the HMCA numbering on the Site Allocations schedules
- revised schedule for Outer West HMCA to correct formatting errors on the version included with the agenda
- supplementary information in respect of site 3376 Weetwood Lane, including exempt information

- an addendum to Appendix 3 providing outstanding information on sites across the HMCAs
- information relating to a site at Topcliffe Lane Morley
- information relating to a site at Nepshaw Lane Gildersome

## **27 Declaration of Disclosable Pecuniary Interests**

There were no declarations of disclosable interests

## **28 Site Allocations Plan - Site Allocation Proposals (Housing and Safeguarded Land)**

The Panel considered a report of the Chief Planning Officer and the supplementary information which had been submitted which set out proposed site allocations for housing and safeguarded land across the city, which had been divided into 11 HMCAs. Officers from City Development were in attendance to respond to queries and comments and were assisted by colleagues from Highways, Children's Services and for the exempt information – the Chief Economic Development Officer

With reference to minute 13 of the Development Plan Panel meeting held on 16<sup>th</sup> December 2014, where Panel considered information on site allocation proposals for Aire Valley Leeds Area Action Plan (AVLAAP), Members were provided with additional information on SHLAA proposals and an explanation of why some of these sites which had been put forward, were not being proposed for housing allocation. Officers advised that further work on this had resulted in two additional sites being identified which would result in the delivery of 58 additional dwellings. In addition, the site capacity of the proposed Skelton Gate housing allocation had been reassessed with an additional 252 dwellings now considered to be deliverable. Members were informed that a further submission had been received from a promoter of a motorway service area on the site. The Officer recommendation remained unchanged that this should not be supported as it was considered incompatible with the development of the larger part of the site for housing. Reference was also made to the likely education provision which would be required in this area, as set out in appendix 2 of the main report

Members discussed the information which had been provided in respect of:

- the level of detail obtained in order to consider site allocations
- the extent of land owners' intent in developing sites and that some sites were constrained by lease agreements in terms of the possible uses
- the possibility of a motorway service station being provided on the site and whether Members had been involved in consideration of this

The Executive Member, Neighbourhoods, Planning and Personnel, stated that changes had been made in light of Members' comments and that the information within the supplementary report had fulfilled the Panel's requirements on this matter. Following consideration of this matter, there was majority support for the housing site proposals as part of the AVLAAP

The Head of Forward Planning and Implementation then set out the context for the site allocations process in relation to the Core Strategy and its target of 66000 new homes across the city, as well as identifying sites to accommodate 6600 (10%) as future safeguarded land (PAS) and whilst it was felt this challenge had been met, it was noted that it had not been possible to find PAS land in all areas. It was

emphasised also, that a series of overarching policies within the Core Strategy (CS) provided the planning framework for the site allocations plan and that it was necessary for the SAP to be in conformity with these Policies including, SP1, SP6, SP7 and SP10

Prior to consideration of the site allocations across the city, a general discussion took place on the process, with the key issues being raised relating to:

- the targets within the CS
- the review of Green Belt land
- that important elements such as housing mix and phasing had not been included in the details before Panel
- provision of infrastructure to support the growth of Leeds and the responsibilities of developers in this
- the sustainability of the process and that economic, environmental and social sustainability needed to be addressed prior to commencement of the consultation process
- the need for new homes
- concerns about coalescence, between individual settlements within Leeds and from expansion close to the towns and cities which bordered Leeds
- that some Members would be reserving their positions on the matters being considered

The Panel then considered each of the HMCAs in turn. Large scale plans and photographs of the sites referred to throughout the meeting were displayed

Officers provided for each HMCA the CS target; the residual target; the total of the proposed sites to be allocated and the shortfall or surplus against the CS target

#### 1 Aireborough

It was noted that in respect of the housing target for this HMCA, there was a surplus of 66 dwellings

Further information was provided in the addendum in respect of sites 1199 Moseley Wood Gardens; 4254 Woodlands Drive and 4095 west of Knott Lane

Members were informed of the level of representations which had been received regarding site 3026 Ings Road with particular concerns about sustainability; the boundary of the site and coalescence, Officers were not proposing to change the allocation. In addition, comments had been received on site 1113 supporting the proposed housing allocation on sites around Nether Yeadon proposed Conservation Area

Three new sites had been submitted for consideration – 5145 – rear of Layton Wood, which Officers proposed for a PAS site. The other site 5151 – land north of Holmehurst off Apperley Lane and 5152 north of Cliff Drive off Apperley Lane - Green Belt sites were not being proposed

Representations were also reported from local Members on specific sites

Members discussed the proposals for the Aireborough HMCA, with issues raised including:

- the extent of development which had been seen in Guiseley in recent years and the impact of this

- the impact of site allocations by Bradford MDC on Guiseley and the need to deal robustly with cross boundary issues in this area
- the need for issues raised by those involved in the Neighbourhood Planning process to be made available to the Panel. A discussion took place on the availability of information which had been submitted to help with understanding the decisions reached by Officers. Concerns were raised that late representations from Leeds Rugby Ltd, for example, had been accepted; that some representations had not been published on the Council's website and the need for all of the information submitted to be available to the Panel. Members were advised that statutory representations were published, with the Chair stating that publication should also be extended to neighbourhood forum representations. However further advice was needed on this matter to clarify what should be made available
- the need for major highway mitigation measures. The Panel's highways representatives advised on the survey work which would be needed to consider both the existing levels of congestion and forecasting changing conditions and the cumulative effects of development. In terms of funding for highways improvements, a limited amount of money was available from the West Yorkshire Combined Authority and developer contributions would be required. It was stressed that mitigation measures would need to address the impact from new development, rather than addressing existing problems
- the extent of the work which had already been undertaken on transport issues

Members considered how to proceed and there was majority support for the site allocation proposals for the Aireborough HMCA

### 2 City Centre

It was noted that in respect of the housing target for this HMCA, there was a surplus of 1113 dwellings

Further information was provided in the addendum in respect of site 1140 Pontefract Lane (land west of) Richmond Hill

The extent of brownfield sites in this HMCA was noted, which Members wished to see being developed first. The scope for windfall sites in this area was raised as was the need for an early decision to be taken on HS2 in view of the extent of land which could be affected by that proposal

Members considered how to proceed and there was majority support for the site allocation proposals for the City Centre HMCA

### 3 East

It was noted in respect of the housing targets for this HMCA, there was a shortfall of 1043 dwellings

Panel discussed the proposals for the East HMCA, with issues raised including:

- Red Hall; its current status as employment land and the view that the site had been proposed for green space. Members were informed that the site had been proposed for housing throughout the Issues and

Options stage and the retention of the playing pitches on the site would be considered as part of the master planning for the site

- that there were ongoing discussions with other Council departments about possible uses for the site
- if the site was allocated for housing, the provision of playing pitches was regarded as non-negotiable

Members considered how to proceed and there was majority support for the site allocation proposals for the East HMCA

#### 4 Inner Area

Further information was provided in the addendum in relation to several sites within this HMCA

The additional housing allocated in the AVLAAP had increased the surplus in this HMCA now to 1497

Members were informed that sites 2148 – Baileys Lane East Seacroft and 2149 Ramshead Approach Seacroft, whilst proposed to be retained as green space, support for housing had been received from Neighbourhood Planning and that these sites would be reviewed, although they were not currently included in the housing total for this HMCA

Members discussed the proposals for the Inner Area HMCA, with issues raised including:

- that smaller green space sites needed to be given careful consideration in view of the lack of green space in some areas of the HMCA
- concerns about site 3081A – Robin Hood West – as it formed a strategic gap between Morley and Rothwell
- that part of the site could possibly be used for a school. The representative from Children's Services stated that consideration of the site would need to be re-evaluated as part of the iterative process of assessing housing proposals and school impact and a decision made on whether this was still needed

Members considered how to proceed and there was majority support for the site allocation proposals for the Inner Area HMCA

#### 5 North

Further information was provided in the addendum in respect of sites 1199 Moseley Wood Gardens and 84 Wetherby Road – Braim Wood School and land to the north, Roundhay

At this point, having resolved to exclude the public to consider the exempt information, the public withdrew from the meeting

A discussion took place on the reasons for the exemption: the process and the lateness of the supplementary information. The Panel's legal representative advised that it was a matter for the Panel to reach a view as to whether it was appropriate and necessary to treat the item as exempt. Unusually in this case, the Panel did not have the exempt information before it prior to taking this decision, because it was provided strictly on the basis of its contents remaining out of the public domain. Had the Panel not resolved to consider the information as exempt, it would not have been distributed. The information had been provided as a direct result of discussions at the Development Plan Panel meeting of 6<sup>th</sup> January 2015,

regarding housing site 3376 – Weetwood Avenue – and enabling development, with a request from Panel for further information (minute 22 refers)

The Panel considered the exempt information, with issues being raised which included:

- concerns about inconsistency of approach towards land owners
- the decision to propose housing on site 3376 despite Members' clear view that it should be retained as green space and where this had emanated from
- the need for the lease to be examined in respect of the loan agreement
- the need to ensure the enabling works did go ahead if a valuable area of green space was to be lost to housing
- the need for further information to be provided about the proposals and that this might not be available prior to consideration of the Site Allocation Proposals by Executive Board in February 2015
- the need for the political group leaders to consider the matters raised in the exempt paper as a matter of urgency

The public were readmitted to the meeting at this point and the Executive Member, Neighbourhoods, Planning and Personnel, thanked the public for their forbearance and their continued enthusiasm for the process and stated that Members had considered an issue which related to commercial sensitivity in respect of enabling development and that due to insufficient information being available, no decision on this site had been taken but that a further report was requested on this site and a site in Tingley

An error on appendix 6 of the submitted report was corrected, with it being stated that rather than a surplus of 40 dwellings in the North HMCA, this should be a shortfall of 40 dwellings

Members were informed that representations had been received in respect of site 3044A – land north of Pinfold Lane and site 3360A Cookridge Hall Golf Course, however no changes were proposed

A new site for housing had been proposed at Moortown Golf Club, however Officers did not propose to allocate this area of land as the preferred use was to retain this as green space

In respect of site 2058 – Talbot Avenue – Allerton Grange High – it was reported that the Friends of Allerton Grange had requested further text to be provided to support non-allocation, and that this would be considered. Regarding site 2055 – Carr Manor, Meanwood, it was stated that the allotments would be retained and protected

On site 4240 – south of A65 from Horsforth and Rawdon RA to crematorium – Horsforth Ward Members had objected strongly to housing development, with their concerns being summarised. A similar representation had also been received from a local member of the community

Members then discussed the proposals for the North HMCA, with issues raised including:

- sites 2058 and 2055 and that the proposed changes were welcomed
- site 4240 for housing; that the Member workshop had considered the site for possible school use and concerns that Ward Members had not been involved in the discussions to allocate the site for housing. The Panel was informed that Officers had been asked to look at a smaller amount of development at Roundhay, due to similar concerns for the

Horsforth site. It was noted that Horsforth Members' preference for site 4240 was as PAS. Officers had considered the infrastructure; that Children's Services requirement for a new school in Horsforth, arising from this and other new housing, was likely to need to be progressed in the short term, and that the housing site would link into the Clariant housing site. The Deputy Chief Planning Officer provided further information and advised that consideration had been given to the potential for development in Roundhay and Horsforth and that on balance there were good planning reasons to propose the site in Horsforth, which would infill a gap between existing development

- concerns about the allocation of sites where the infrastructure was not known, particularly the highway requirements and the issue of sustainable travel. The Panel's highways representatives provided information on the likely highway improvements which would be needed and the benefits they would bring
- concerns about coalescence with other communities and the need for strong defined barriers
- that the Clariant site had been granted on appeal; the level of development in Guiseley and the extent of the highway works which would be required to deal with all of the additional traffic at Horsforth roundabout

Members then considered how to proceed, with there being majority support for the site allocation proposals for the North HMCA

#### 6 Outer North East

Further information was provided in the addendum in respect of site 1027 Wetherby Road (land to west), south of Bardsey

It was noted that in respect of the housing targets for this HMCA, there was a shortfall of 57 dwellings

Members were informed of a site which was missing from the schedule, this being reference 5168 – Wood Farm Scarcroft which was submitted on time and which had an estimated capacity of 778 dwellings. Members were informed that the site owner wished to split the site between greenfield and brownfield land.

However, it was the view of Officers that the site did not fit into the settlement hierarchy, so had not been proposed for allocation

Members discussed the Outer North East HMCA, with issues raised including:

- site 3391 Headley Hall, Bramham - which was proposed for large scale housing development; that 3000 dwellings were shown as the site's capacity( to be delivered within the plan period) when it could accommodate 4200 units. It was noted that some reference to this needed to be included within the supporting text of the Plan
- education provision; that a developer/landowner was offering school places; that it was appropriate for a high school to be provided in this location yet Officers indicated further provision was not required, which was not considered to be acceptable. Officers considered that due to a high degree of surplus in the local schools, additional secondary places were not considered necessary, but that the pattern and location of provision would be reviewed, and it might be appropriate to locate provision within the site

- the level of PAS sites being allocated in this HMCA and that large amount of PAS sites should be returned to Green Belt
- that City Plans Panel had approved a site in outline which on the plan before Members was shown as a greenfield site
- representations which had been made about Green Belt sites
- that the Headley Hall site, which was a Green Belt site, had merit for housing allocation but that alternatives could be considered which took up less Green Belt land. Within this context, reference was made to the potential for housing on a substantial brownfield site at Thorp Arch, within the same HMCA

Members considered how to proceed. A proposal to look again at site 3391, together with sites 1055A and 1055B to see if the level of Green Belt land take on site 3391 could be reduced was proposed, seconded and voted upon with there being majority support for the site allocation proposals for the Outer North East HMCA, with one amendment which related to site 3391 and that this site, together with sites 1055A and 1055B, should be reconsidered and a comparative exercise be undertaken to review the options within the area. This related to the potential for housing at Thorp Arch (as part of a potential mixed use proposal) and the scale of Green Belt release at Headley Hall to be considered before reaching a final view

#### 7 Outer North West

It was noted that in respect of the housing targets for this HMCA, there was a shortfall of 200 units. One new site had been submitted for consideration – site 5155, land east of Moor Road Bramhope – not proposed for allocation

Receipt of a representation on site 1002 – Creskeld Lane Bramhope – land rear of no. 45 – was reported, with concerns being raised about the site assessment. Officers advised that the conclusion reached to allocate the site for housing would round off the existing settlement and that a separate meeting on this had taken place with Councillor Anderson. Further comments on sites 3044A and 3360A had already been covered under North HMCA

Members discussed the proposals for the Outer North West HMCA, with issues being raised including:

- site 2130 – Church Lane Adel and that this should be retained as PAS
- the level of housing development within this area and that infrastructure needs had to be considered
- education provision, which had been deemed to be of moderate risk, when locally there was a serious risk, particularly in view of the additional sites which would be developed, i.e. Eastmoor, Bodington and the former DWP site and that if site 2130 did come forward for development, the provision of a new school would be essential
- disappointment that sites on Pool Road were not considered to be in a sustainable location
- the number of sites having to come forward due to the CS figures which had been adopted
- a survey which had been carried out and showed accommodation in Adel was required for older people, which needed to be taken into consideration
- issues of coalescence



- the A65 and A66 corridors and the impact on residents in Otley, particularly in view of there not being a comprehensive infrastructure plan and the need for more information, with Highways Officers outlining the current situation in terms of traffic modelling

The Panel considered how to proceed and there was majority support for the site allocation proposals for the Outer North West HMCA. Officers were asked to supply Councillor Anderson with the percentage details of housing allocation for this HMCA on Green Belt and greenfield sites

#### 8 Outer South

It was noted that in respect of the housing targets for this HMCA, there was a shortfall of 135 dwellings

Members were informed that one new site had been proposed, site 5153 – land south of Barnsdale Road Methley, although it was not proposed to be allocated

Concerns had been raised by Ward Members in respect of sites 1261A Church Farm Lofthouse and 4220 land south of Brook Farm and it was hoped these sites would not be released too early in the process. Site 3081A (previously discussed under Inner HMCA) was referred to and the concerns of Ward Members over allocation of sites in Rothwell

The Panel considered how to proceed and there was majority support for the site allocation proposals for the Outer South HMCA

#### 9 Outer South East

Further information was provided in the addendum in respect of sites 4200A and 4200B – Newtown Farm Micklegate; 1169 – Hall Farm Road and 1173 Honeysuckle Close

It was noted that in respect of the housing targets for this HMCA, there was a shortfall of 555 dwellings

Members discussed the proposals for the Outer South East HMCA, with issues raised including:

- the extent of the shortfall on this and other sites and whether this had been made up elsewhere. Members were informed that the shortfalls had been made up by the surplus numbers in the Inner and City Centre HMCAs
- the difference in numbers given now compared to in the workshops. Members were advised that only that which could be delivered in the plan period had been included but that if more sites came forward, this would be of benefit
- site 1232B and that the land owners of the nearby Garden Centre be approached with a view to enlarging the site

Members considered how to proceed, with there being majority support for the site allocation proposals for Outer South East HMCA

#### 10 Outer South West

Further information was provided in the addendum in respect of sites 1205 Mill Lane East Ardsley; 1260A and 1260B Batley Road Tingley and 3060B Gelderd Road/M621 Gildersome

It was noted in respect of the housing targets for this HMCA, there was a shortfall of 393 dwellings

A site plan showing the allocations for 1018A and 1018B land off Topcliffe Lane Morley was circulated for Members' information, with Officers advising that site 1018B was proposed for employment and not allocated for housing with site 1018A being proposed to provide the buffer for the development

A new site had been submitted – reference 5165 – land at Moor Knoll Lane East Ardsley - although it was not proposed to allocate this site

The receipt of representations was reported in relation to site 3060A – Gelderd Road/M621 Gildersome supporting housing and that no change to the allocation of housing was proposed. Reference was also made to a letter from Councillor Leadley who had raised issues on specific sites

Officers referred the Panel to the supplementary report regarding employment land on two sites at Nepshaw Lane, following on from the discussions on employment land allocations at the Development Plan Panel meeting held on 6<sup>th</sup> January 2015 (minute 22 refers). Although Members had favoured housing allocation on at least part of the site, Officers remained of the view this should be allocated for employment and that not pursuing employment allocations would give a deficit and if only part of the site was taken, it would leave the Council vulnerable and therefore it was felt prudent to proceed with a surplus of employment land. Members were also reminded that in terms of the site coming forward, there was a planning application currently being progressed for employment use. It was felt that the site was suitable for employment use which was its UDP allocation, but also due to its proximity to motorways and potential workforce

Members discussed the proposals for the Outer South West HMCA, with issues raised including:

- sites 1018A and 1018B and serious concerns about encroachment into other areas
- that the sites at Nepshaw Lane had been the subject of proposals and applications for 14 years and had not been progressed and that if the current application for the scheme failed, that further consideration of the allocation for the site should be given. The current developer should be advised that the current application represented the last opportunity to secure approval for an employment scheme on the site
- site 2127 – Tingley Station with concerns that this allocation had been inherited from the UDP process. Officers confirmed that for this site it was to be allocated as PAS but that a school would be required if the site was developed
- the extent of the allocation in the Outer South West HMCA and the related PAS total and that a lower housing target of 50,000 would have been better
- concerns about coalescence both within Leeds and with areas in neighbouring authorities due to the loss of Green Belt

Members considered how to proceed and there was majority support for the proposals for the Outer South West HMCA, subject to the expectation that the developer of the employment sites at Nepshaw Lane would make progress with the current planning application

Following consideration of this matter, Councillor Leadley left the meeting

## 11 Outer West

It was noted in respect of the housing targets for the HMCA, there was a surplus of 23 units

Members were informed that the previous day, Bradford MDC has suggested two sites – ref 5169 and 5170, which were shown to Panel on the images presented at the meeting. The importance of Ward Members considering the sites ahead of any assessment was stressed

Representations from Councillor A Blackburn on behalf of all of her Ward colleagues had been received in respect of site 3455A – allocated as PAS, as the Ward Members considered this should remain as Green Belt  
A suggested amendment to site 3340 – Owlcotes Gardens – had been put forward by Councillor A Carter which had been considered but was not being proposed to be taken forward

Members discussed the proposals for the Outer West HMCA, with issues raised including:

- the extent of land being taken from the Green Belt for site 1201 – Woodhall Road (land adjoining) – Gain Lane Thornbury
- that the proposed sites by Bradford MDC should be investigated and Ward Members be consulted

Members considered how to proceed and there was majority support for the site allocation proposals for the Outer West HMCA

Having considered the report, the appendices; the supplementary information; the presentations by Officers; the comments and views of the Panel, the majority decision of the Panel was

**RESOLVED -**

- To support the site allocations proposals set out in this report, subject to an amendment to the proposals for the Outer North East HMCA to look again at site 3391, together with sites 1055A and 1055B to carry out a comparative exercise to enable alternative options to be considered before reaching a final view and in relation to the employment land at Nepshaw Lane Gildersome, subject to the developer making progress with the current planning application on this site, and to recommend to Executive Board that these provide a basis to prepare a Publication draft Plan for deposit in 2015
- To note that further refinement to the proposed allocations for housing and safeguarded land may be necessary in the light of the work on plan preparation and further evidence coming forward and that the additional information requested by Panel on specific matters be provided
- To note, as set out in paragraph 2 of the report, that following the completion of more detailed work in relation to the proposals covered in this report, together with work in relation to outstanding matters, further consideration by Development Plan Panel will be needed in the preparation of the emerging plan
- To note that the proposals are not being agreed for public consultation at this stage, but that they will be subject to public consultation later in 2015

**29 Date and Time of Next Meeting**

To be confirmed



## Report of Chief Planning Officer

## Report to Development Plan Panel

**Date: 19<sup>th</sup> May 2015**

## **Subject: Implications of the 2012-based household projections on the Core Strategy Housing Requirement**

Are specific electoral Wards affected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If relevant, name(s) of Ward(s): ALL	
Are there implications for equality and diversity and cohesion and integration?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is the decision eligible for Call-In?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does the report contain confidential or exempt information?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

### **Summary of main issues**

1. The Leeds Core Strategy was adopted in November 2014 following a period of extensive preparation and public scrutiny; including Examination by an independent Planning Inspector. The Core Strategy sets an overall requirement of 70,000 homes (net) between 2012 and 2028. There is a consequent need to allocate land for 66,000 homes via the Site Allocations Plan (SAP) and Aire Valley Leeds Area Action Plan (AVLAAP). This housing requirement is derived from an extensive evidence base, which is subject to continuous monitoring. Within this overall context, this report examines the key messages from a variety of drivers of growth and sources of information which have emerged since the Examination of the Core Strategy, including the most recent household projections.
  
2. A key piece of evidence is projected population and household change. The latest Government figures, February 2015, suggest that a lower level of growth, than set out in the Core Strategy, is projected to occur in Leeds. However, as emphasised in the National Planning Policy Framework (NPPF) and by the Core Strategy Inspector, projections are only the starting point for an analysis of a full housing requirement and wider local evidence needs to be considered.
  
3. Looking at the evidence in the round over the long term and balancing the effects of the recent recession alongside the sustained growth in the decade prior to the downturn, it is recognised that whilst the 70,000 (net) Core Strategy figure remains at the upper end of likely scenarios to 2028 it is not significantly at variance with the direction of travel of the most recent evidence, National Planning Policy Guidance

(NPPG) and local and sub-regional objectives. Officers have reached this conclusion on the basis that the latest projections and economic forecasting would suggest a figure in the region of 60,000 net new homes. However, as the report sets out, there are a number of compelling factors which would have the effect of increasing this number.

4. There is a commitment to continually monitor the evidence base of the Core Strategy and to undertake a selective Review within three years following its Adoption i.e. by the end of 2017. By this time the Council will be better placed to understand how the economic recovery affects the evidence base for the Core Strategy, including its housing requirement. Development Plans are meant to cover in excess of 15 year Plan periods and there is a danger that reviewing a Plan following a market downturn (at a point in time) will mean a need to review again once the market improves. This does not provide the certainty needed for residents, investors and infrastructure providers in Leeds or the provision of a resilient Plan to withstand different stages of the economic cycle.
5. At the same time there is a need to implement the proposals of the Core Strategy in Leeds, via the SAP and AVLAAP. The SAP ensures that the priority areas are developed with the remaining areas protected and in line with the CS directing the majority of development to the Main Urban Area to make best use of previously developed land and infrastructure and targeted greenfield development. Delays to the SAP and AVLAAP are unwelcome because without an up to date allocations plan in place the Council is at risk from further house builder pressure to build on sites which the Council and local people do not wish to see released. The SAP and AVLAAP are the means by which the Council can continue to demonstrate that it has a Five Year Supply of land. Without their progression the Council risks facing a period of 'planning by appeal' where despite having an Adopted Core Strategy the most vulnerable greenfield sites will be under intense pressure for release in an unplanned and uncoordinated way at the expense of local engagement via a plan-led approach.
6. There are understandably concerns around progressing the allocations plans in advance of a Core Strategy Review, which may amend the housing requirement, but it is important to understand that in addition to the above harm, any Review would restart the clock on a new Plan period and mean that additional years would need to be provided for. In the meantime, the Council will ensure that the phasing of the allocations prioritises the release of previously developed land and land which is most accessible, brings with it the infrastructure improvements which Leeds needs and provides the new homes which people in all parts of Leeds need, whilst ensuring that latter phases are not released until they are needed to meet a supply of land which is based on an up to date housing requirement.

## **Recommendations**

7. Members of the Development Plan Panel are recommended to:
- i) note the contents of the report and endorse the maintenance of the Core Strategy housing requirement as a basis for the Leeds Site Allocations Plan and Aire Valley Leeds Area Action Plan
  - ii) support the continual monitoring of the evidence underpinning the housing requirement, as further evidence is made available and the updating of Development Plan Panel on a bi-annual basis of any meaningful and significant changes
  - iii) support a selective review of the Core Strategy within 3 years of its Adoption and following subsequent household projections, which will better reflect demographic trends of a recovering economy
  - iv) support wider Corporate mechanisms to co-ordinate the monitoring of changes to the population, household composition and economic growth of Leeds relating to wider Council services which depend on demographic analysis and forecasting

### **1 Purpose of this report**

- 1.1 This report provides an update on monitoring the evidence base of the Adopted Core Strategy. It sets out the broad approach to establishing a housing requirement in the Plan and explores whether the latest evidence warrants a root and branch review of this requirement.

### **2 Background**

- 2.1 The need to plan for population growth and demographic change in Leeds is a key objective of the Core Strategy (CS), and has its roots in the Vision for Leeds and Best Council Plan which set out the need for and benefits of growth. In Leeds there is an accepted need to cater for an increasing number of single person homes as a result of changing demographics, including an ageing population and high level of graduates who wish to remain in the City. At the same time there is recognition that Leeds should be taking the lead in driving the economy of the Leeds City Region (LCR) as set out in the Strategic Economic Plan, agreed by the relevant local authority Leaders. The CS seeks to manage this growth in a sustainable manner with a development focus on the City Centre, Inner Area, regeneration priorities and East Leeds.
- 2.2 The Council's recently adopted CS housing requirement rests at 70,000 homes (net) between 2012 – 2028. The requirement represents the full objectively assessed need (OAN) for housing in Leeds; in line with Government guidance contained in the National Planning Policy Framework (NPPF) and accompanying guidance which at

its heart seeks to significantly boost the supply of housing to address a nationally accepted housing shortage. The intent to meet its full objectively assessed need is part of a package of housing growth measures brought forward by the Council, which also includes: a Council House Building Programme, a brownfield land investment programme and the return of long term empty properties to use.

- 2.3 Whilst these growth ambitions and spatial approach are not in dispute, the latest headline 2012-based population and household projections bring the precise scale of local growth into question. Sub-national population projections (SNPP) are released every two years by the Office of National Statistics (ONS) and identify how local populations will change if trends (in births, deaths, internal migration and international migration) experienced in recent years are projected forward for the next 25 years. Sub-national household projections (SNHP) are released every two years by the Department for Communities and Local Government (CLG) and, using SNPP as their base, assess the likely level of household change when applying estimated change in the size and make up of households.
- 2.4 The Core Strategy requirement of 70,000 was prepared on the basis of a holistic Strategic Housing Market Assessment (SHMA, 2011), as required by the NPPF, and was not directly linked to a specific household projection figure. The 2008-based household projections were the starting point for the SHMA but were recalibrated by external demographic experts (Edge Analytics – based at the University of Leeds), using local GP registration data which pointed to a lower than estimated base population. It is important to remember that the CS housing requirement was therefore substantially lower than the ONS projected growth at the time because of this recalibration. The difference between this local approach and national demographic releases has important implications for assessing demographic change in Leeds because the range of potential future scenarios is far wider than for other authorities where recalibration has not occurred.
- 2.5 A SHMA Update (Edge Analytics, 2013) was also prepared for the CS Examination which looked at the 2010-based and post Census 2011-based population projections. The 2010 and 2011-based population projections identified a lower rate of household growth, and were discussed in some detail at the Examination in Public. Following the final CS hearings and through the process of Main Modifications to the CS, the Inspector was made aware of the 2012-based sub-national population projections (SNPP), by the City Council and a number of representors (including resident's groups).
- 2.6 In his report<sup>1</sup> the Core Strategy Inspector made a number of key points in relation to the objective assessment, which are summarised below:
- assessing housing need is not an exact science
  - it would be unwise to base requirements on recent lower rates of household formation, as shown in recent projections

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<sup>1</sup> Leeds City Council Core Strategy: Final Inspector's Report (paras 9 to 19), 5<sup>th</sup> September 2014



- reopening the debate on projections following the release of the 2012-SNPP would not lead to clear and reliable conclusions
- most of the employment-led scenarios lead to figures in the region of 70,000
- all past housing need has not been met in Leeds and is therefore reflected within the 70,000
- population projections are only part of the picture
- Leeds' economic role in the region, specific needs and ambitions of the City Council, are relevant to the setting of a requirement

2.7 The 2012-based SNPP were converted into sub-national household projections (SNHP) in March 2015. They reveal that the number of households in Leeds is projected to increase by 45,000 between 2012 and 2028 (i.e. 2,800 homes per annum). Following these national headline figures a number of requests have been made to revise the Core Strategy requirement. The Government requires that Local Plans should be kept up-to-date and considers that *“a meaningful change in the housing situation should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued”*.

2.8 The question of whether a meaningful change has occurred and whether this triggers a need to review the housing requirement in the CS is examined below. The report sets out the Government Guidance that must be followed if a review of the CS housing requirement is undertaken and then looks by means of a high level “sense check” at the various pieces of evidence that would need to be addressed.

### **3 Government Guidance**

3.1 The NPPF states that local authorities should boost significantly the supply of housing, and in so doing, ensure that their evidence base meets the full, objectively assessed need for market and affordable housing. They should prepare a SHMA which meets household and population projections, taking account of migration and demographic change and cater for housing demand and the scale of housing supply necessary to meet this demand.

3.2 More detailed guidance is provided in the NPPG which states:

- Household projections should provide the starting point estimate of overall housing need
- Household projections may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends
- Plan makers should not apply constraints to the overall assessment of need
- Establishing future need for housing is not an exact science. No single approach will provide a definitive answer
- Local planning authorities should assess their development needs working with the other local authorities in line with the duty to cooperate

- Household formation rates may have been suppressed historically by under-supply and worsening affordability of housing. The assessment will therefore need to reflect the consequences of past under delivery of housing
- As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply
- Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate
- The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals
- Appropriate comparisons of indicators should be made. This includes comparison with longer term trends in the housing market area and nationally. A worsening trend in any indicator will generally require upward adjustment to planned housing numbers compared to ones based solely on household projections

3.3 Clearly, it would be inappropriate to simply substitute a CS requirement with the latest household projection figure. A far more in depth assessment is required and the guidance is heavily stacked in favour of boosting the housing requirement, particularly to take account of any unmet and concealed needs and to reflect the impacts of economic growth on the need for housing.

3.4 This was the experience of the City Council at its CS Examination where the Inspector was categorically of the view that the Council should not be seeking to project forward the effects of the recession on migration, household formation and household size, and in addition was concerned that the concealed needs of those unable to afford to buy a house (older children living with parents or sofa surfing) were addressed.

3.5 This experience is occurring elsewhere in the Country and the following table shows where authorities have recently experienced significant delays and uncertainty to plan preparation, as a result of not fully reflecting national guidance in deriving full OANs.

<b>Authority</b>	<b>Housing Issue identified by Planning Inspectorate</b>
<i>East Staffordshire</i>	<i>Need to factor that employment and housing growth will return to trend as economy improves</i>
<i>Uttlesford</i>	<i>Too low. No attention to market signals</i>
<i>Cheshire East</i>	<i>Serious mismatch between economy and housing strategies and no attention to market signals</i>
<i>Eastleigh</i>	<i>No attention to market signals and under-estimate of affordable housing need</i>
<i>Solihull</i>	<i>OAN must be policy-off and objective</i>
<i>Horsham</i>	<i>Need to reflect local economic ambition</i>

3.6 At a local level, within Leeds City Region, City of York Council, Kirklees (MBC) and Harrogate (BC), have had to withdraw their Development Plans at examination stage, due to issues of soundness, relating to housing issues linked to the derivation of

OANs. In Kirklees' case they suggested that the housing requirement should be based on what people were likely to be able to afford and what house builders would build. Their Inspector was of the view that the full OAN should be identified. As with the examples cited above, this has led to considerable delays and uncertainty and the continued risk of proposals for 'unplanned' and poorly co-ordinated development, to be assessed without the benefit of an up to date 'local plan'.

- 3.7 Given that the CS is now Adopted, a change to its housing requirement would only be possible via a review to the Core Strategy. Moreover, only once that Plan was significantly advanced would figures within it carry any weight. In December 2014 the Planning Minister, Brandon Lewis, set out the relationship between housing figures produced as part of a SHMA and those in a Local Plan. He said *"the outcome of a SHMA is untested and should not automatically be seen as a proxy for a final housing requirement in Local Plans. It does not immediately or in itself invalidate housing numbers in existing Local Plans"*.

#### **4 The latest evidence**

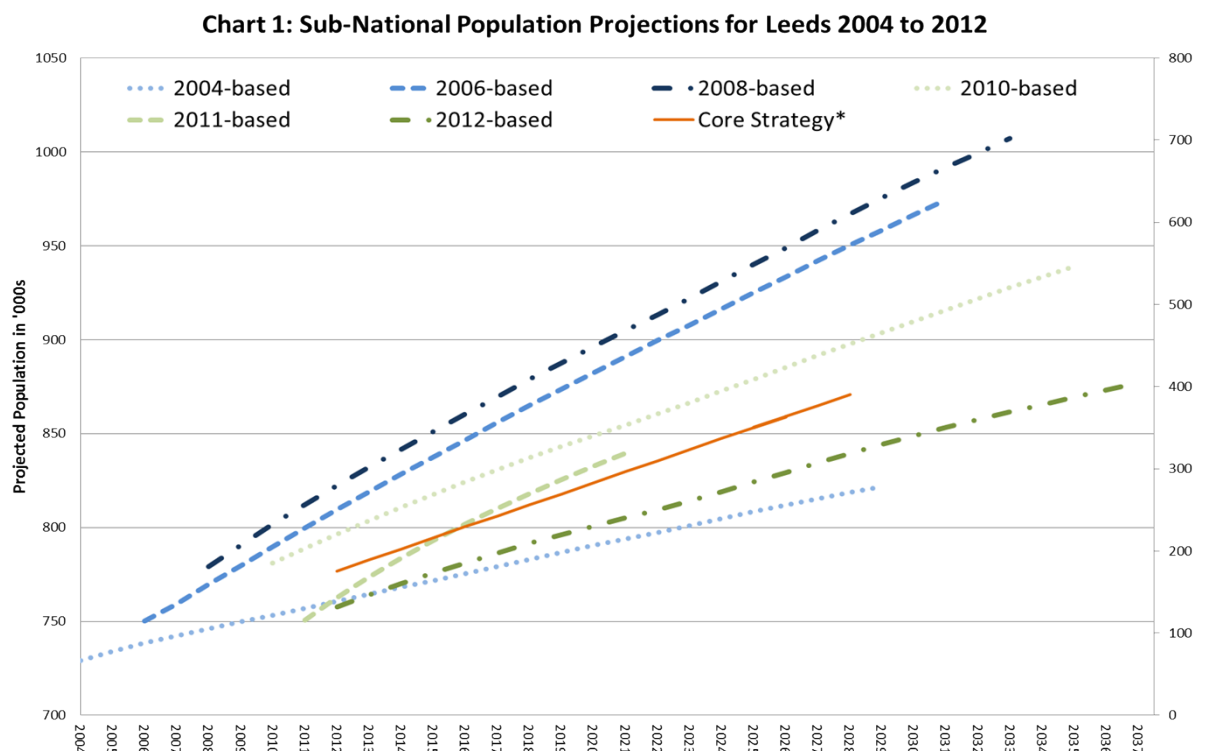
- 4.1 Given that the 2012-based household projections are the second set of household projections since the SHMA to project a lower rate of household growth in Leeds it is important to reflect on and understand how they might influence the CS requirement and whether they are likely to represent a meaningful change. There are a number of drivers of housing growth and these are examined in the context of the latest evidence below. This report does not set out a full analysis of each of the drivers, such work would need to be done through a thorough SHMA. Instead it provides a "direction of travel" for each driver which is summarised in **Appendix 1**.

##### Main Issues

- 4.2 The derivation of an objective assessment must be done as part of a wider Strategic Housing Market Assessment (SHMA), which is a complex and resource intensive task involving the triangulation of a number of different factors so as to ensure that results are credible and robust over a plan period of 16 years. Given that the Core Strategy is recently adopted following lengthy preparation and examination and that the SHMA underpinning it is recent assessment (prepared in 2011 and updated in 2013 to reflect post-Census projections) there would need to be a meaningful change in the evidence base in order to undertake a root and branch review at this time.
- 4.3 This report examines the main "direction of travel" messages from the evidence and considers their implications for the CS requirement. If the City Council were minded to change the housing requirement of the CS this cannot be undertaken without a formal plan review. This would need to be supported by a revised Strategic Housing Market Assessment (SHMA), to form a comprehensive evidence base. A SHMA is an intensive piece of work (involving extensive technical work and extensive stakeholder engagement including via the house building industry) and it is therefore necessary to gauge what the latest evidence is telling us in general, prior to commencing such work.

## Population projections

- 4.4 Population projections are released every two years and are always changing because they are based on the most recent historical evidence. For Leeds they are also heavily influenced by the significant recalibration of population following the new Census information where 50,000 were removed from the base population.
- 4.5 The Council would be unable to plan solely for projected growth figures based on a recession since this would compound the problems of local household formation and would not take into account economic 'up turns' over a full plan period. One way of dealing with this is to recognise the impact of economic cycles and look across a number of projections. This is important so as to provide certainty to investors, developers and the local community and so as to plan for strategic medium and long term infrastructure. In broad terms, between 2004 and 2012, the CS housing requirement sits slightly lower than average population growth projections. However, it must be noted that the 2006 and 2008 projections are likely to have included an overestimation of international in-migrants in the Leeds population that was remedied in post-Census projections.



## Household projections

- 4.6 Household projections convert population projections into households by applying headship rates (or household size). Average household size generally reduces over time to account for an aging population and more single person households. Therefore, for each population projection, a range of household projections can be derived depending on how quickly household size is projected to shrink locally. The

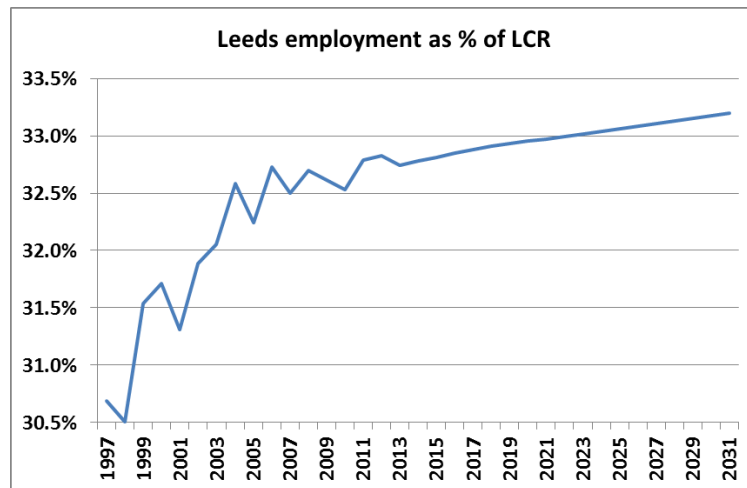
recession has reduced rates of household formation and there has been a consequential increase in larger households. The Government do not wish local authorities to maintain such trends and the CS Inspector in his report notes, “it would be unwise not to anticipate a growth in household formation rates as the economy and confidence improves.”

#### The relationship between jobs and new homes

- 4.7 Leeds sits at the heart of the City Region and the Strategic Economic Plan (SEP) sets out long term ambitions for the economy of the City Region up to 2021. The Growth Deal proposed in the SEP is based on population growth driving housing demand. The SEP acknowledges that it is access to finance, construction and a risk-averse construction sector that is restricting the realisation of this growth rather than a lack of need and demand.
- 4.8 The Regional Econometric Model<sup>2</sup> (REM) provides different outputs every six months but on average over the past few years they have rested at around job growth of 54,000 jobs between 2012-2028 or 3,375 jobs per annum. This compares to levels of 2,710 jobs per annum between 1997 and 2014. Such job growth estimates are supported by work on strategic infrastructure planning, the unlocking of sites via regeneration areas, Enterprise Zones and the devolution of local powers to the combined authority.
- 4.9 It is on this basis that it is considered appropriate and in line with national guidance to moderate SNHP with optimistic job growth estimates. Not only does this estimate the likely in-migration of people to Leeds who will require a new home (which in Leeds is a broad spectrum of high and low earners) it also, especially through provision of affordable housing, helps to unlock the recession induced household formation rates which characterise recent projections. Linking such rates to optimistic job growth levels ensures that Leeds builds sufficient homes to ensure competition and less volatile house prices which in turn ensure economic growth and stability for local communities.
- 4.10 The REM has shown recent increases since the recession and is now at a higher level than when the original SHMA was prepared. To illustrate the role of the District within the wider City Region the table below shows that Leeds’ employment as a share of the Leeds City Region is expected to grow throughout the plan period.

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<sup>2</sup> The REM provides economic and labour market estimates and forecasts for the UK, local authorities and city regions. It is operated by Experian Business Strategies and the Regional Economic Intelligence Unit in the West Yorkshire Combined Authority.



Source: Regional Economic Intelligence Unit West Yorkshire Combined Authority

- 4.11 A key area of work needs to be undertaken within the sub-region on commuting patterns and job growth (and the relationships to housing growth). The timing of this needs to reflect the current and future rounds of Development Plan preparation and requirements under the Duty to Co-operate and the Council will engage with the City Region so as to ensure that a future Review of the evidence can include a consistent approach to this evidence.

A backlog of housing need

- 4.12 Housing projections do not reflect unmet housing need and national guidance is clear that such need must be added on to objectively assessed need and addressed within five years. The Core Strategy Inspector noted that not all existing housing need in Leeds has been met and this factor is likely to have partly influenced his decision to retain the CS requirement despite scenarios of lower projected growth. The identification of a significant backlog of housing need is something that Bradford MBC has done explicitly through its recent Core Strategy submission. It is not possible to gauge with accuracy a level of total pre-Core Strategy housing need backlog from the currently available evidence. However, the SHMA identified a backlog of 4,000 households in need based on homeless, living in temporary accommodation or concealed in the social rented sector. Further more detailed work will be needed to identify a full picture as part of a SHMA.
- 4.13 If the Council were to undertake a fundamental review of the SHMA the backlog of housing need would be a key consideration and one which would be highly scrutinised. In addition, national guidance advises that “household formation rates may have been suppressed historically by under-supply and worsening affordability of housing” and that local authorities should “reflect the consequences of past under delivery of housing” including where this may have been “constrained by supply”.

Need for affordable housing

- 4.14 There is a huge need for affordable housing in Leeds and the current housing requirement envisages that over 1,100 homes are made affordable each year. There

remains a reliance on S106 as the primary delivery mechanism for affordable housing, despite the fact that given recent low levels of building grant funded schemes have been the prime route for delivery. A consequence of setting housing requirements towards the upper end of likely scenarios is that there is a greater ability to deliver the affordable housing the City needs. A failure to deliver an adequate supply of housing would have adverse consequences for affordable housing delivery because greater affordability pressures would reduce the ability of people to purchase homes on the open market. In turn this would increase the need for affordable housing and exacerbate the current shortfall further. There is a real danger that by setting a requirement at the lower end of likely scenarios the problem of concealed households will not be remedied.

#### Uncertainties around international migration

- 4.15 Recent national figures point to a return to pre-recession trends for international migration despite Government caps and targets. It is a highly uncertain element of demographic modelling but must be factored into any flexibility which a longer term housing target should embed.

#### Market Signals

- 4.16 The NPPG advocates that local authorities should respond to market signals that may lead to upward revision of housing requirements, to increase supply and address affordability problems for example.
- 4.17 The NPPG requires that planning authorities should analyse market signals to see if planning in the past has constrained housing development. Where that was the case, demographic projections will carry forward that under-provision, and therefore should be adjusted upwards. There is a great deal of uncertainty around whether the land supply in Leeds has indeed constrained housing development. The house builders have consistently argued that it has and any revised SHMA may see a re-opening of this debate.

#### Consequence of evidence upon CS review

- 4.18 The process of undertaking a SHMA would be lengthy (up to 12 months in total) and would necessitate the involvement of a wide range of stakeholders, including house builders and neighbouring authorities. Once agreed the implications of the SHMA on the CS would need to be assessed and could include amendments to:
- overall housing requirement
  - the spatial distribution of housing
  - affordable housing levels
  - rates of CIL
  - brownfield land target

- 4.19 Work on the Site Allocations Plan would need to cease until such a time as the CS was amended and taken through a process of consultation and examination. This could take up to two years; leading to a total delay to the SAP of up to 3 years.
- 4.20 Such a delay would lead to harm to the implementation of the CS strategy chiefly through impacts on the City's housing land supply. The only option for release of land to make up a five year housing land supply would be from non-Green Belt sites i.e. existing safeguarded land or from rural land.
- 4.21 There would also be a need via the review to re-set the base date of the CS. If this were done the plan period would extend from 2016 to 2032. In such cases it is likely that the pool of sites identified to form part of the SAP to 2028 would remain even if the revised plan target was lower overall. This is because there would already be a need to remedy backlog between 2012 and 2016 which already stands at 3,000 homes.

#### Corporate consideration of demographics

- 4.22 The projections and the manner in which they change is not simply a matter for the housing requirement in Leeds. A corporate approach to dealing with demographics across the City Council which links planning, housing, economic growth and a range of service delivery factors is essential.

## **5 Corporate Considerations**

### **5.1 Consultation and Engagement**

- 5.1.1 The SNHP and SNPP have ramifications across the City Council and have been considered by officers within the Policy and Intelligence section of Strategy and Resources Directorate. Officers have also engaged with the Regional Economic Intelligence Unit (REIU) of the Combined Authority. The REIU was established to ensure a co-ordinated approach to the use of key intelligence resources (such as the Regional Econometric Model) and to provide specialist economic support across the sub-region and to Leeds City Council.
- 5.1.2 Officers have also consulted with Edge Analytics who have been involved for many years in assessing the implications of demographic change upon the authority. Whilst Edge Analytics remain of the view that the Core Strategy requirement remains at the upper end of likely scenarios, they share the Council's view that a wider range of factors will need to be considered and that the analysis set out above is an appropriate account of the headline factors.

### **5.2 Equality and Diversity / Cohesion and Integration**

- 5.2.1 In the preparation of the Core Strategy, due regard has been given to Equality, Diversity, Cohesion and Integration issues.



### **5.3 Council Policies and City Priorities**

5.3.1 The adopted Core Strategy takes forward the spatial objectives of the Vision for Leeds and the priorities set out in the City Priority Plans and the Best Council Plan (in particular Objective 2: to 'promote sustainable and inclusive economic growth'). Housing Growth is a City Council 'break through' project. This will be supported through the identification of land and its phasing through the Site Allocations Plan and Aire Valley Leeds Area Action Plan.

### **5.4 Resources and value for money**

5.4.1 The preparation of statutory Development Plan Documents is an essential but a very resource intensive process. This is due to the time and cost of document preparation (relating to public consultation and engagement), the preparation and monitoring of an extensive evidence base, legal advice and Independent Examination. These challenges are compounded currently by the financial constraints upon the public sector and resourcing levels, concurrent with new technical and planning policy pressures arising from more recent legislation (including the Community Infrastructure Levy and Localism Act). There are considerable demands for officers, members and the community in taking the Development Plan process forward.

5.4.2 For the Local Development Framework to be as up to date as possible, the Council now needs to produce the Site Allocations Plan as quickly as practicable, following the adoption of its Core Strategy. This will provide value for money in that the council will influence and direct where development goes. Without an up to date plan the presumption in favour of development by the Government means that any development in conformity with national policy will be acceptable, regardless of any previous positions of the authority, which will have implications in terms of resources and value for money and the operational issues associated with "planning by appeal".

5.4.3 In that context, a revised SHMA could cost in excess of £50,000 and would need to be sufficiently robust to withstand inevitable objection. Understanding the likely consequences of undertaking such work at an early stage ensures that the Council spends money wisely.

5.4.4 If the housing requirement were to be reduced there may be a knock on consequence for other parts of the plan, including for New Homes Bonus, CIL and infrastructure spending in the District.

### **5.5 Legal Implications, Access to Information and Call In**

5.5.1 The report is not eligible for call in as no decision is being taken.

### **5.6 Risk Management**

5.6.1 Amending the Core Strategy target would require a halt to the progression of the Site Allocations Plan and Aire Valley Leeds Area Action Plan. Without a current

allocations plan(s), aspects of the existing UDP allocations will become out of date and will not reflect or deliver the Core Strategy policies and proposals. Early delivery is therefore essential to enable the Council to demonstrate that sufficient land will be available when needed to meet the Core Strategy targets. Without an up to date plan the presumption in favour of development by the Government means that any development or neighbourhood plan in conformity with national policy will be acceptable, regardless of any previous positions of the authority. The more the work progresses, the more material weight can be given to it.

- 5.6.2 The establishment of cross Corporate monitoring arrangements to take account of changes to the evidence base will ensure that the Council can be responsive to the individual changes to the evidence base.
- 5.6.3 The Council is committed to an early selective Review of the Core Strategy within 3 years of Adoption. In the meantime the ongoing monitoring of the Core Strategy evidence base coupled with the implementation of a phased approach to Site Allocations will ensure that the risks of releasing land unnecessarily is reduced.

## **6 Conclusion**

- 6.1 The derivation of an OAN is not simply a consequence of substituting one household projection figure for another. A fundamental SHMA review would be required and once this had been completed any changes would have to be made via a development plan review involving two rounds of public consultation and the necessary legal and plan making requirements such as the Duty to Cooperate and consistency with the wider CS. This report seeks to explore whether the latest evidence suggests a need for a fundamental SHMA review. It then must balance this with the harm which may arise in Leeds from having a housing requirement which is in excess of full needs arising during the Plan period.
- 6.2 There are a number of different elements to a SHMA and these are covered broadly in the report. The two main drivers which point to a lower target than 70,000 homes are population and household projections, and on their own they suggest a household change in the region of 45,000 households. However, the national evidence is not yet complete as household type headship rates remain to be released by Government.
- 6.3 Other drivers which will also need to be assessed as part of a SHMA are likely to generate upward adjustments. Whilst it is not possible to ascertain the precise scale of the adjustments it is unlikely that they would match the 70,000 figure in the CS which the Council has consistently argued is at the upper end of likely scenarios.
- 6.4 However, there is national recognition that housing needs should be met and that local authorities must significantly boost the supply of housing locally. Part of achieving sustainable development locally requires meeting needs for housing and the CS requirement is a hard won strategy for achieving substantial growth whilst protecting the quality of the environment and local community identity. Whilst it is

acknowledged that on the face of it the basis for the CS requirement may have shifted there are a number of high profile local evidence and policy drivers which an Inspector would expect the Council to take account of and adjust the figure upwards.

- 6.5 The purpose of this report has been to set out a high level sense check of the latest information available, including household projections and economic forecasts. Further work is needed on these sources of information, as household projections remain incomplete. Based on the evidence at it stands, it is the view of officers that the housing requirement would be in the region of 60,000 net new homes between 2012 and 2028 and that the requirement in the Core Strategy is at the upper end of likely scenarios. However, as set out in the report, account would need to be taken of any historic backlog of housing and how such a requirement would impact upon the need for more affordable housing in Leeds. It is only possible to assess such elements via a SHMA but it is noted that the identified unmet social housing needs in the SHMA (2010) totalled 4,000 homes.
- 6.6 If members determine that a review of the SHMA is the best course of action there are some significant consequences which would need to be addressed. First, the CS target would remain until replaced and would continue as the basis for determining the Council's five year land supply and assessment of backlog. Second, with a delay to the progression of the Site Allocations Plan and Aire Valley Leeds Area Action Plan it would be apparent that there would be a delay in bringing forward new sites to maintain and supplement the Council's recently endorsed five year housing land supply. This would leave the Council vulnerable to proposals on non-green belt sites – all PAS sites would be at risk alongside land currently designated as “rural land” – and a cycle of planning by appeal would likely ensue, unless LCC accepted these consequences.
- 6.7 There is therefore a strong argument to proceed with the Allocations Plans as programmed whilst considering a selective Review of the Core Strategy within 3 years of its Adoption. This commitment has already been made and would allow a period of time for the local economy to recover from recession and for such growth to be picked up in trend based forecasts.
- 6.8 At the same time it will be important for the Council to continue to monitor the evidence base and it is recommended that this is prioritised at a wider corporate activity rather than solely as an element within the Forward Planning and Implementation Service.
- 6.9 Finally, it will be of critical importance that the Council is able to implement a phased approach to the release of Site Allocations. Many other authorities under the new provisions of the NPPF have no phasing at all. There is a specific paper on the proposed approach to phasing at this Panel meeting. The Council will ensure that the phasing of the Site Allocations prioritises the release of previously developed land and land which is most accessible, brings with it the infrastructure improvements which Leeds needs and provides the new homes which people in all parts of Leeds need, whilst ensuring that less sequentially preferable phases are not released until











they are needed to meet a supply of land which is based on an up to date housing requirement.

## **7 Recommendations**

7.1 Members of the Development Plan Panel are recommended to:

- i) note the contents of the report and endorse the maintenance of the Core Strategy housing requirement as a basis for the Leeds Site Allocations Plan and Aire Valley Leeds Area Action Plan
- ii) support the continual monitoring of the evidence underpinning the housing requirement, as further evidence is made available and the updating of Development Plan Panel on a bi-annual basis of any meaningful and significant changes
- iii) support a selective review of the Core Strategy within 3 years of its Adoption and following subsequent household projections, which will better reflect demographic trends of a recovering economy
- iv) support wider Corporate mechanisms to co-ordinate the monitoring of changes to the population, household composition and economic growth of Leeds relating to wider Council services which depend on demographic analysis and forecasting

## Appendix 1: Summary of drivers

Local policy	<ul style="list-style-type: none"> <li>• address housing need</li> </ul>	
Sub-Regional policy	<ul style="list-style-type: none"> <li>• role as part of the Leeds City Region</li> </ul>	
Population projections	<ul style="list-style-type: none"> <li>• based on recession trends</li> </ul>	
Household projections	<ul style="list-style-type: none"> <li>• based on recession trends</li> </ul>	
Job growth	<ul style="list-style-type: none"> <li>• emerging from recession</li> </ul>	
Backlog / concealed need	<ul style="list-style-type: none"> <li>• at least 4,000 in social rented sector pre-2012</li> <li>• some element of private sector pre-2012</li> </ul>	
Affordable Housing	<ul style="list-style-type: none"> <li>• house prices are increasing</li> <li>• income needed for mortgage payments is increasing</li> <li>• mortgage lending is increasing but slowly (but in some cases these drive up prices)</li> </ul>	
Market signals	<ul style="list-style-type: none"> <li>• demand for housing increasing</li> <li>• relationship between historic supply and demand</li> <li>• rates of development</li> </ul>	
Current international migration trends	<ul style="list-style-type: none"> <li>• signs that increasing steeply as recovery from recession bites</li> </ul>	
Commuting	<ul style="list-style-type: none"> <li>• commuting ratio remains similar to the original SHMA</li> <li>• as Leeds' role in the LCR develops this may change</li> </ul>	

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**Report of the Chief Planning Officer**

**Report to Development Plan Panel**

**Date: 19<sup>th</sup> May 2015**

**Subject: Housing Phasing**

Are specific electoral Wards affected? If relevant, name(s) of Ward(s): ALL	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there implications for equality and diversity and cohesion and integration?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is the decision eligible for Call-In?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does the report contain confidential or exempt information? If relevant, Access to Information Procedure Rule number: Appendix number:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

**Summary of main issues**

1. The adopted Leeds Core Strategy sets out the overall requirements for the location, scale and distribution of housing growth (SP1: Location of Development, SP6: The Housing Requirement and Allocation of Housing Land, SP7: Distribution of Housing Land and Allocations). Within this strategic context, Policy H1 identifies the approach to the 'Managed Release of Sites'. The focus of this Policy is to ensure that sites:
  - are in sustainable locations
  - are managed and phased in a timely manner, consistent with the spatial priorities of the Plan (with emphasis upon the role of the Settlement Hierarchy)
  - provide an appropriate balance of brownfield and greenfield sites
  - make best use of current and planned infrastructure
  - which are sequentially less preferable are released only when needed
  
2. The focus of this approach is to ensure that both local priorities (identified as part of the Core Strategy) and national requirements (as set out in the National Planning Policy Framework (NPPF)) are met. The NPPF requirements include the need to:
  - meet objectively assessed needs for market and affordable housing

- identify and maintain a supply of 5 years' worth of deliverable sites
  - identify a supply of specific developable sites over the Plan period
3. As emphasised in previous reports to the Development Plan Panel and Executive Board, whilst the Core Strategy sets out the overall strategic requirements, it is the role of the Site Allocations Plan (SAP) and Aire Valley Leeds Area Action Plan (AVLAAP), to identify specific sites for housing and their phasing.
  4. Executive Board on 11<sup>th</sup> February agreed the set of site allocations, as a basis to prepare a Publication draft SAP and AVLAAP. It was recognised in this report that further work was needed in a number of areas (including site phasing) and within this context, the purpose of this report is to set out the overall approach and methodology for the 'managed release of sites' (in conformity with Policy H1), for the SAP and AVLAAP.

### **Recommendation**

5. Members of the Development Plan Panel are invited to comment on and to endorse the overall approach to Housing Phasing.



## 1.0 Purpose of this Report

- 1.1 Executive Board on 11<sup>th</sup> February agreed the set of site allocations, as a basis to prepare a Publication draft SAP and AVLAAP. It was recognised in this report that further work was needed in a number of areas (including site phasing) and within this context, the purpose of this report is to set out the overall approach and methodology for the ‘managed release of sites’ (in conformity with Policy H1 of the Core Strategy).

## 2.0 Background Information

- 2.1 The Core Strategy sets out the overall requirements for the location, scale and distribution of housing growth over the Plan period (2012-2028). Integral to this is Policy H1, which identifies the policy approach and criteria for the managed release of sites. The Policy is set out below.

### **POLICY H1: MANAGED RELEASE OF SITES**

LDF Allocation Documents will phase the release of allocations according to the following criteria in order to ensure sufficiency of supply, geographical distribution in accordance with Spatial Policy 7, and achievement of a previously developed land target of 65% for the first 5 years and 55% thereafter. Subject to these considerations, phases with the earliest release should be made up of sites which best address the following criteria:

- i) Location in regeneration areas,
- ii) Locations which have the best public transport accessibility,
- iii) Locations with the best accessibility to local services,
- iv) Locations with least impact on Green Belt objectives,
- v) Sites with least negative and most positive impacts on existing and proposed green infrastructure, green corridors, green space and nature conservation.

Consideration will be given to bringing forward large sites, of more than 750 dwellings, to facilitate, early delivery in the Plan period.

In special circumstances, allocated sites may be permitted to be released in advance of their phasing outlined above, so long as the permitted site delivers infrastructure and housing investment that is needed within Regeneration Priority Programme Areas. In such cases, suitable mechanisms will be agreed to ensure that delivery within the Regeneration Priority Programme Area occurs either before, or in conjunction with the delivery of the permitted site.

The Council will maintain a five year supply (plus appropriate NPPF buffer) of deliverable housing sites through considering release of the subsequent phase or phases of sites to help address the shortfall.

Phase means a series of sequential bands of site preference

- 2.2 The Issues and Options Site Allocations Plan (Summer 2013) sought people's views on phasing and invited responses on whether particular sites could or should be developed in the short (0-5years), medium (5-10years) or long term (10 years+). In the main responses to this question provided little by way of information on the achievability of sites e.g. specific time limited constraints which may affect their phasing. Most representations reflected concerns around the release of specific sites in principle. In any event the Core Strategy Inspector's modifications to Policy H1 clarified that phasing should be driven by the sufficiency of supply of land on a rolling basis, rather than in fixed time periods.

### **3.0 Main Issues**

#### Overview

- 3.1 Policy H1 sets out a criteria based approach to the managed release of sites, to be identified through LDF allocation documents. The Policy highlights six criteria to guide the phasing of sites, consistent with the overall spatial objectives and priorities of the Plan. Important components of the Policy include: the need to deliver a distribution of sites via Housing Market Characteristic Areas (HMCA), a sufficient split of brownfield and greenfield sites, the need to bring forward large sites (i.e. more than 750 dwellings) early in the Plan period so as to ensure delivery within the plan period and the necessary delivery of infrastructure and the need to maintain a 5 year housing land supply. It should be noted that the submission version of the policy included criteria on ensuring that previously developed land had been sufficiently exhausted prior to bringing forward more greenfield land. The Core Strategy Inspector made modifications to the policy which removed these criteria as he considered that they were unsound and contrary to the main thrust of national guidance on significantly boosting the supply of housing (see ¶3.14 below).
- 3.2 In translating the CS Policy requirements into a realistic and deliverable approach, it is important to strike an appropriate balance between meeting numerical housing targets, maintaining a 5 year supply, managing and stimulating opportunities for housing development through urban regeneration and growth and the need to plan for infrastructure.
- 3.3 In terms of national guidance, the NPPF is not prescriptive in specifying requirements for phasing but emphasises the desire to 'deliver a wide choice of quality homes' and to ensure that local planning authorities 'identify a supply of specific developable sites for growth' (para. 47). Following on from this the guidance suggests 3 phases. An early phase for years 1–5, a second phase 6-10 and a further phase 11-15 (with Protected Areas of

Search/Safeguarded Land being considered after this, should it be required at a future date).

- 3.4 In reflecting the national planning guidance from a local Leeds perspective, it is imperative that a sufficiency of supply is maintained, whilst delivering the wider priorities of the Plan. Consequently, there is a need to identify an optimum number of phases (to help the District meet housing needs in line with the spatial strategy, support regeneration and plan for infrastructure) but to recognise that the focus is upon delivery and supply (as an important factor guiding release), rather than specific phases of release linked to specific timescales.
- 3.5 Taking the above considerations into account, 3 phases are advocated for the managed release of sites for the SAP and AVLAAP. These phases are linked to the spatial strategy of the Plan, and focus development primarily in regeneration areas and in relation to the settlement hierarchy. The phases are comprised of categories of sites based upon their planning status, location, their designation as brownfield or greenfield and scale. Table 1 below illustrates each phase, together with the broad anticipated quantum for each category and phase in meeting the overall requirement<sup>1</sup>.
- 3.6 Importantly, whilst Phase 1 is identified as commencing from the base date of the Core Strategy (April 2012), it is anticipated that Phases 2 and 3, should follow on sequentially to meet supply requirements, as and when necessary, rather than being linked to a specific timescale. In seeking to effectively manage the release of sites, the proposed 3 phases would operate as 'pools of supply', from which the 5 year supply is maintained. This aligns with the NPPF which states, in para. 47, that in order to maintain a 5 year supply, additional land may be 'moved forward from later in the Plan period'.
- 3.6 In adopting this approach, Table 1 below highlights that Phase 1 identifies a substantial pool (over two thirds of the requirement for the Plan-period). This enables a focus to be given to the spatial priorities of the Core Strategy, the provision of a sufficient range and choice of sites (in different market areas), together with a sufficient quantum to meet 5 year supply requirements.

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<sup>1</sup> Table 1 offers guidance on broad quantum at this stage and will be updated and presented to Panel as part of the SAP Housing papers at the 24<sup>th</sup> June meeting. At this stage each site will be identified by its phase and Members will see how phasing affects individual HMCAs following ongoing assessment.

Table 1: SAP/AVLAAP Managed Release of Sites

**Phase 1** would start at 2012 (year 0 of the Plan) and include:

	<b>Category</b>	<b>No. of sites</b>	<b>No of Units</b>
A	Extant planning permission	311	20,090
B	UDP allocations	62	10,110
C	Brownfield within MUA	100	6,980
D	Brownfield within major settlement	20	710
E	Brownfield within regeneration area	2	70
F	Greenfield within regeneration area	37	5,730
G	City Centre	60	6,590
H	Sites over 750 units	3	6,090
I	Greenfield within MUA	17	840
J	Greenfield within major settlement	5	190
K	Brownfield within smaller settlement	9	270
L	Greenfield MUA extension	3	135
	<b>TOTAL</b>	<b>629</b>	<b>57,650</b>

**Phase 2** would include:

	<b>Category</b>	<b>No. of sites</b>	<b>No of Units</b>
M	Greenfield MUA extension	10	1,200
N	Greenfield major settlement extension	15	2,760
O	Greenfield within regeneration area	2	760
P	Greenfield within smaller settlement	2	370
	<b>TOTAL</b>	<b>29</b>	<b>5,090</b>

**Phase 3** would include:

	<b>Category</b>	<b>No. of sites</b>	<b>No of Units</b>
Q	Greenfield within smaller settlements	6	110
R	Small settlement extensions	24	2,910
S	Rural allocations	3	210
	<b>TOTAL</b>	<b>33</b>	<b>3,230</b>

- 3.7 Members will see that most of the greenfield land release in Phase 1 is made up of existing UDP allocations, sites with permission, greenfield sites within regeneration areas (in order to stimulate local housing markets) and sites over 750 units.

### Policy Adjustments

- 3.8 In following the above methodology, in preparing the draft SAP and AVLAAP Publication Plans, once site allocations have been categorised (as set out in Table 1), a series of other factors will also need to be considered i.e. 'policy adjustments'. These comprise considerations of:
- i) whether sites are phased on the basis of locations which have the best public transport accessibility; to be sourced from existing Sustainability Appraisal (SA) evidence are released first ,
  - ii) whether sites are phased on the basis of locations with the best accessibility to local services; to be sourced from existing SA evidence
  - iii) whether sites align with infrastructure requirements (SP1) and planned infrastructure improvements e.g. highways and/or education investment plans.

### Moving between Phases

- 3.9 Policy H1 states that the Council will maintain a 5 year supply through consideration of the release of the subsequent phase or phases of sites to help address the shortfall. This is to allow a degree of sensitivity and flexibility in the application of the policy. This approach is also consistent with the NPPF which is clear that sites can be moved from later phases to help address a 5 year supply.
- 3.10 In order to support the implementation of the phasing approach throughout the life of the Core Strategy and Site Allocations Plans there will be a need for a Strategic Housing Land Availability Assessment (SHLAA) and 5 Year Supply assessment to be updated annually. These evidence base assessments will:
- maintain the trajectory of delivery including any quantum of shortfall or oversupply
  - assess the contribution that smaller windfall delivery (including self-build) and the return of empty homes to use make to the longevity of a particular phase
  - assess the contribution that larger windfall makes to the supply (e.g. an increase in larger deliverable windfall sites may delay the need for less sequentially preferable phases to be brought forward)
  - assess the deliverability of supply within each phase (phase 1 may contain sites which are undeliverable within a given 5 year period, e.g. because they are currently in another use or impeded by infrastructure delivery)

### Green Belt

- 3.11 The phasing in table 1 seeks to ensure that Green Belt sites are released so as to meet the objectives of the Core Strategy, especially releasing urban extensions in regeneration areas so as to help stimulate housing delivery in

these areas by providing a competitive choice to housebuilders in the localities and ensuring that such developments bring with them local benefits via CIL and commuted sums. In accordance with the approach set out above land removed from the Green Belt will be released as follows<sup>2</sup>:

- Phase 1 - 8,900 homes (15% of the total for that phase)
- Phase 2 - 3,920 homes (77% of the total for that phase)
- Phase 3 - 2,350 homes (73% of the total for that phase)

Maintaining a previously developed land completions target

3.12 The previously developed land (PDL)/greenfield split that results from the proposed approach to land *supply* phasing is set out below:

- Phase 1 - 58% PDL / 42% greenfield
- Phase 2 - 3% PDL / 97% greenfield
- Phase 3 - 9% PDL / 91% greenfield

**TOTAL - 52% PDL / 48% greenfield**

3.13 The achievement of a PDL *completions* target is set out in Policy H1 of the Core Strategy, which states that 65% of gross completions for the first five years and 55% thereafter should be on PDL. It is important to note that the levels of PDL supply in the allocations plan will be supplemented by smaller windfall sites, (which total on average 500 units per year), and any larger windfall which emerges via the SHLAA process. To that end, the supply split will inevitably underplay a contribution from other sources of PDL. For information, monitoring reveals that between 2012-15 PDL completions have been at an average of 81%.

3.14 The Core Strategy Inspector, in his Report, removed criteria relating to the release of greenfield land. He notes (¶28 of his Report) that *“Policy H1 as submitted placed unduly onerous restrictions on the release of sequentially less preferable sites. This is rectified by MM16 which is necessary to ensure that accommodating the city’s housing needs can be met and a continuous supply maintained. Some will argue that relaxing Policy H1 will allow developers to develop greenfield sites ahead of brownfield. I cannot say that this would not happen but, as modified, Policy H1 should enable the Council to ensure that land in less sequentially preferable locations is only released when necessary to maintain a supply of housing land.”*

3.15 The Adopted Core Strategy Monitoring Framework follows through this logic and notes *“If the PDL targets are not being met the Council will review its land release policy in accordance with H1. The Council will be in a position to resist further greenfield land release if the PDL targets are not being met, so as to encourage brownfield and regeneration development, as part of the*

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<sup>2</sup> Figures are approximate at this stage.

*overall approach of the Core Strategy*". This management mechanism can provide some flexibility for the Council should the greenfield element of the phasing set out above become under pressure to be the main source of delivery in Leeds.

#### **4.0 Other considerations**

##### Duty to Co-operate

- 4.1 The City Council has engaged with City Region (particular neighbouring authorities) in the preparation of the emerging Publication SAP and AVLAAP Plans.

#### **5.0 Corporate Considerations**

##### 5.1 Consultation and Engagement

- 5.1.1 The Core Strategy has now been adopted and has been found by an independent Inspector to be sound (this also includes compliance with the Duty to Co-operate and the regulated requirements for public consultation and engagement). The preparation of the SAP and AVLAAP has been subject to earlier stages of public consultation and engagement. Further engagement will take place at Publication stage, prior to submission for examination (anticipated autumn 2015).

##### 5.2. Equality and Diversity / Cohesion and Integration

- 5.2.1 In the preparation of the Core Strategy, due regard has been given to Equality, Diversity, Cohesion and Integration issues. This has included the completion of EDCI Screening of the Core Strategy and meeting the requirements of the Strategic Environmental Assessment Directive, which has meant that these Plans are subject to the preparation of a Sustainability Appraisal. The purpose of such Appraisals is to assess (and where appropriate strengthen) the document's policies, in relation to a series of social (and health), environmental and economic objectives. As part of this process, issues of Equality, Diversity, Cohesion and Integration, are embedded as part of the Appraisal's objectives. The SAP and AVLAAP material reflects the approach set out in the Core Strategy. Nevertheless an Equality Impact Assessment Screening will be undertaken on the proposed site allocations and will be part of the package to be presented to Executive Board. Equality, diversity, cohesion and integration issues are being considered as part of the preparation of the Plan and through the sustainability appraisal work which is ongoing.

### 5.3. Council Policies and City Priorities

5.3.1 The adopted Core Strategy, the emerging SAP and AVLAAP, play a key strategic role in taking forward the spatial and land use elements of the Vision for Leeds and the aspiration to the 'the best city in the UK'. Related to this overarching approach and in addressing a range of social, environmental and economic objectives, where these Plans also seeks to support and advance the implementation of a range of other key City Council and wider partnership documents. These include the Best Council Plan (2013-17) and Leeds Joint Health and Wellbeing Strategy (2013-2015).

### 5.4 Resources and value for money

5.4.1 The preparation of statutory Development Plan Documents (the 'local plan') is an essential but a very resource intensive process. This is due to the time and cost of document preparation (relating to public consultation and engagement), the preparation and monitoring of an extensive evidence base, legal advice and Independent Examination. These challenges are compounded currently by the financial constraints upon the public sector and resourcing levels, concurrent with new technical and planning policy pressures arising from more recent legislation (including the Community Infrastructure Levy and Localism Act). There are considerable demands for officers, members and the community in taking the Development Plan process forward.

5.4.2 For the Local Development Framework to be as up to date as possible, the Council now needs to produce the SAP and AVL AAP as quickly as practicable, to deliver the priorities set within the Core Strategy and the Best Council Plan. Without an up to date plan the presumption in favour of development by the Government means that any development in conformity with national policy will be acceptable, regardless of any previous positions of the authority, which could have implications in terms of resources and value for money.

5.4.3 The phasing of sites needs to be supported by up to date monitoring of delivery and supply via an Authority Monitoring Report, SHLAA and 5 Year Supply assessment. These are in general undertaken 'in-house' although specific analysis on issues such as viability may need to be out-sourced.

### 5.5 Legal Implications, Access to Information and Call In

5.5.1 The SAP and AVLAAP follow the statutory development plan process (Local Development Framework). The report is not eligible for call in as no decision is being taken.



## 5.6 Risk Management

- 5.6.1 Without a current allocations plan for this geographical area, aspects of the existing UDP allocations will become out of date and will not reflect or deliver the Core Strategy policies and proposals. Early delivery is therefore essential, alongside the SAP and AVLAAP, to enable the Council to demonstrate that sufficient land will be available when needed to meet the Core Strategy targets. Without an up to date plan the presumption in favour of sustainable development by the Government means that any development or neighbourhood plan in conformity with national policy will be acceptable, regardless of any previous positions of the authority. The more the work progresses, the more material weight can be given to it.

## 6.0 **Conclusion**

- 6.1 This report has set out the proposed approach to site phasing, as a basis to deliver the requirements of Policy H1 for the 'managed release of sites'. The purpose of this is to identify site phasing through the SAP and AVLAAP, in order to deliver the priorities set out as part of the Core Strategy. Central to this approach is the need to maintain a 5 year housing land supply and to manage release to support policy requirements, rather than linked explicitly to fixed timescales.
- 6.2 The report also sets out how the Council can ensure that land in less sequentially preferable locations is only released when necessary to maintain a supply of housing land and as part of this describes how additional sources of supply outside of the SAP and AVLAAP may be identified throughout the Plan period, as windfall, which may help ensure the longevity of latter phases.

## 7.0 **Recommendation**

- 7.1 Development Plan Panel is invited to comment on and endorse the overall approach to Housing Phasing.

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## Report of Chief Planning Officer

## Report to Development Plan Panel

**Date: 19<sup>th</sup> May 2015**

## **Subject: Gypsies, Travellers & Travelling Showpeople Site Allocations Progress Update**

Are specific electoral Wards affected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If relevant, name(s) of Ward(s): ALL	
Are there implications for equality and diversity and cohesion and integration?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is the decision eligible for Call-In?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does the report contain confidential or exempt information?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

### **Summary of main issues**

1. There is a shortage of authorised sites for Gypsies and Travellers which has historically led to increasing incidence of unauthorised encampments, which can create tensions between the settled community and Gypsies and Traveller communities. Whilst the Council has effectively managed such incidences in recent years there remains a pent-up demand for more Gypsy and Traveller sites in Leeds.
  
2. A level of need in Leeds has been established in the Core Strategy and the Site Allocations Plan must identify sites to address these needs for the plan period. The process of identifying sites is ongoing and this report provides an update for Panel Members on the legislative and policy background, the current authorised provision in Leeds and the approach to allocating sites.
  
3. A further report will be presented to Panel Members at the 24<sup>th</sup> June meeting and consultation with Ward Members, neighbouring authorities and local representatives will be undertaken on specific sites prior to this meeting.

### **Recommendations**

4. Members of the Development Plan Panel are recommended to:
  - i. Note the progress on identifying Gypsy and Traveller sites for the Site Allocations Plan & Aire Valley Leeds Area Action Plan.

## 1. Purpose of this report

- 1.1. To update Members on progress towards allocating sites for Gypsies and Travellers in Leeds through the Site Allocations Plan (SAP) and Aire Valley Leeds Area Action Plan (AVLAAP). This report sets out the approach used and forms the first of two reports to Plans Panel. A further report, to be considered at the 24<sup>th</sup> June meeting, will identify a range of preferred sites.

## 2. Background

- 2.1. It is widely accepted that there is a national shortage of authorised sites for Gypsies and Travellers (G&T) and Travelling Showpeople. This has led to increasing incidence of unauthorised encampments, which can create tensions between G&T and the settled community. It is well recognised that G&T are amongst the most socially excluded groups in society and independent national research confirms the link between the lack of good quality sites and poor health and education outcomes. G&T are being held back by some of the worst outcomes of any group across a range of social indicators on housing, health, education, incidence of hate crime and access to employment<sup>1</sup>. Both the Government and the Council recognise that unmet need for housing must be addressed. The provision of authorised sites is therefore an important step in managing a host of issues.
- 2.2. There is a considerable body of legislative and national planning guidance to assist local authorities in addressing these matters and meeting the housing needs of G&T:
  - Section 225 of the **Housing Act (2004)** places an obligation on local housing authorities to assess the accommodation needs of G&T in their area and to develop a strategy to address these needs. If a G&T is statutorily homeless the Council is obliged to secure them suitable temporary accommodation and to maintain this duty until suitable long-term accommodation can be secured. However, it is not defined in law that suitable accommodation must be pitch based.
  - G&T have been recognised by the courts as being distinct ethnic groups and are protected from discrimination by the **Equality Act 2010**. The courts have made clear that travelling is not a defining characteristic of these groups, but only one among others. It is important to ensure that the cultural needs of G&T are met and recognise that for most, there will be an aversion to bricks and mortar housing. The Council also has a statutory duty to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations in the course of developing its policies and delivering its services.
  - The **Equality Act** defines English, Welsh and Scottish Gypsies, Romany Gypsies, Irish Travellers, New Age Travellers, and Travelling Showmen as

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<sup>1</sup> (2012) Department of Communities and Local Government, [Progress report by the ministerial working group on tackling inequalities experienced by Gypsies and Travellers](#)

distinct ethnic minorities because of their long shared history, with family and cultural traditions that distinguish them from other groups.

- Government planning guidance “**Planning Policy for Traveller Sites**” (PPTS) was published in 2012. PPTS advises that local authorities should set pitch targets for G&T and plot targets for Travelling Showpeople. It also advises that in producing their Local Plan, authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of sites against their locally set targets. It states that the Government’s overall aim is to ensure fair and equal treatment for Travellers, while respecting the interests of the settled community.

2.3. For the purposes of SAP, and to ensure the accommodation needs of all G&T are considered (including those who do not have a nomadic habit of life but may still have a strong cultural aversion to bricks and mortar accommodation and be in need of a pitch), the definition of G&T as used in the 2004 Housing Act is used<sup>2</sup>. This defines G&T as:

*“Persons with a cultural tradition of nomadism or of living in a caravan; and all other persons of a nomadic habit of life, whatever their race or origin, including: (i) such persons who, on grounds only of their own or their family’s or dependant’s educational or health needs or old age, have ceased to travel temporarily or permanently; and (ii) members of an organised group of travelling showpeople or circus people (whether or not travelling together as such).”*

2.4. The needs of Gypsies, Travellers and Travelling Showpeople differ. Gypsies require sites which are accessible to local services and pitches which are large enough to accommodate up to two caravans alongside amenity blocks.

2.5. Travelling Showpeople are a different ethnic group and do not always live in caravans. Their needs are more directly linked to their main employment (servicing fairs and fairgrounds) therefore sites tend to be larger, due to the practicalities of securely storing equipment and HGVs. Accessible road travel is also a priority and constraints relating to the use of HGVs are a key factor in assessing the local impacts of sites. When developing a site, Showpeople require little input from the local authority as they are prepared to purchase land, develop the site and put in water, electricity and roads themselves.

2.6. In Leeds G&T are represented by a member’s organisation called Leeds Gypsy and Traveller Exchange (Leeds GATE). Most Showmen belong to the Showmen’s Guild,

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<sup>2</sup> It should be noted that DCLG released a consultation in September 2014 seeking to amend the Housing Act definition to remove the words “and permanently”. This would have the effect of meaning that those G&T who have ceased travelling permanently for reasons of health, education or old age (be it their needs or their family’s or dependents’) are for the purposes of planning treated in the same way as those who continue to travel. A Government response to this consultation has not been released.

a firm regulatory body for its members, who have specific responsibilities, rights, and privileges. The Showmen's Guild is represented at a Yorkshire level.

### **Current approaches to the provision of accommodation**

2.7. Leeds, like most other parts of the country, has a shortage of authorised G&T sites. Historically this has created unauthorised developments and encampments. However, in recent years, and following a Scrutiny Inquiry in 2010, emphasis has been placed upon addressing immediate needs and priorities (for families living on the roadside), as well as developing a longer term approach through the Core Strategy and Site Allocations Plans to meet arising needs and where families are "doubling up" on existing provision. To that end, the Council has pursued two options to address immediate needs:

- a planning application for an additional 12 pitch extension to Cottingley Springs (the Council's only managed site for permanent pitches) was refused by the Secretary of State following a "call-in" hearing in public. The main reasons for refusal were: harm to Green Belt outside of a plan-making process and impact on the neighbouring settled community.
- a 3 year temporary permission for 8 pitches has been granted at Kidacre Street (City & Hunslet), which is fully subscribed and has helped to reduce the incidence of unauthorised encampments and to relieve pressure for pitches at Cottingley Springs.

2.8. The Council recognises that the ability to enforce against unauthorised development in Leeds is related to our proactivity in meeting the need for new provision. If the Council supports the provision of sites largely for Leeds based G&T it will be in a much stronger position to resist inappropriate encampments.

### **Gypsies and Travellers – Existing Supply**

2.9. In Leeds there is a current residential supply (assuming one household per pitch) of 41 public sector pitches at Cottingley Springs, Farnley & Wortley and 7 authorised private pitches. Authorised pitches include sites with planning permission (in the form of permanent, personal or temporary permissions) and sites with established use rights or other planning status which means that planning enforcement action cannot be taken. Note that the site at Kidacre Street does not form a part of the existing supply, as this was granted permission after the CS assessment was completed. The 7 authorised households are on sites at:

- Nepshaw Lane, Morley South (permanent non-personal permission)
- Rose Neath Place, Farnley & Wortley (long term encampment)
- Ninevah Lane, Kippax & Methley (temporary personal permission)
- Knotford Nook, Otley & Yeadon (long term encampment)
- Springfield Villas, Morley North (temporary personal permission)

- 2.10. There are also a number of G&T sites which are unauthorised but categorised as “tolerated sites”. These did not form part of the identified existing supply of land at the time of the Leeds Needs Assessment. These sites are:
- Dunningley Lane, Middleton, Middleton Park (expired personal permission)
  - Ilkley Road, Otley & Yeadon (no permission / currently vacant)
- 2.11. In addition, further investigation – through the Site Allocations Plan process – has revealed that a number of sites have received planning permission for “siting of caravan use” exclusively for G&T families. These are sites at:
- Scarecrow Farm, Farnley & Wortley
  - land to the south of Scarecrow Farm, Farnley & Wortley
  - Thorp Lane, Ardsley & Robin Hood
  - Thorpefields, Ardsley & Robin Hood
  - Urn Farm, Middleton Road, Middleton Park
- 2.12. The SAP is an opportunity to consider the long term future planning status of these authorised, unauthorised and tolerated sites and to establish a level of provision on each. Consultation between the Council and landowners, families on the sites and local representatives is ongoing to establish the potential for these sites to be considered as future identified sites. This will not only ensure certainty for the families who currently live there and local people and is likely to reduce the need to identify new sites.

### **Travelling Showpeople – Existing Supply**

- 2.13. There are 21 funfairs in Leeds each year between April and October but the operators of these funfairs have no authorised accommodation in Leeds. Operators and their families are living in overcrowded conditions, secure their equipment on sites where they don't live or travel long distances to operate in Leeds, which increases the costs of their livelihoods.
- 2.14. The recent local Leeds GTAA carried out with the Showmen's Guild assessed a need for 15 plots in Leeds up to 2028 and that these could be accommodated on one or two sites.
- 2.15. There is an unauthorised “tolerated” site at Whitehall Road where 7 families are reported to currently reside. The site is over-crowded and not well laid out. Any further provision will have to take into account the long term prospects of this existing site and any established use rights it may acquire so as to ensure that there is no over provision in the District.

## **3. The Core Strategy Policy**

- 3.1. Policy H7 of the Adopted Core Strategy plans for the accommodation of G&T in Leeds. The Core Strategy Inspector had initial concerns with the submitted policy at hearings in October 2013, as he felt that the assessment of need was not sufficiently

robust. However, following further work on levels of concealed need, including a survey of the local G&T population, the policy was found sound at a hearing in May 2014, with the Inspector commending the Council on its additional positive work. The Adopted Core Strategy policy H7 is included in full below.

**POLICY H7: ACCOMMODATION FOR GYPSIES, TRAVELLERS AND TRAVELLING SHOW PEOPLE**

The City Council will identify suitable sites in the Site Allocations Plan to accommodate the following identified needs:

- 62 pitches for Gypsies and Travellers (of no more than 15 pitches per site), and
- 15 plots for Travelling Showpeople (to be accommodated on either one or two sites)

In identifying land or determining planning applications for pitches / plots, consideration will be based on the following criteria:

- i. pitches and plots should have reasonable access to public transport, health care, schools, shops and local services
- ii. pitches and plots should not be located on land that is deemed unsuitable for general housing, such as land that is contaminated, adjacent to refuse sites, landfill sites, heavy industry or electricity pylons
- iii. pitches and plots should avoid zones of high flood risk (zone 3 flood risk areas)
- iv. the following order of preference for categories of land should be followed: brownfield, greenfield and Green Belt. Alterations to the Green Belt boundary to accommodate pitches and plots will only be considered in exceptional circumstances, to meet a specific identified need. In such circumstances and as part of the Site Allocations Plan, sites will be specifically allocated as a Gypsy, Traveller and Travelling Showpeople's site only
- v. the availability of alternative deliverable sites for Gypsies and Travellers and Travelling Showpeople

3.2. The justification to the policy also includes the following principles:

- whilst the national guidance is for no more than 15 pitches per site there is a preference from local G&T's themselves and local Members for a larger number of small sites rather than a smaller number of large sites – this approach to size has helped influence the selection of sites
- the overall need is split between an expressed preference for public provision, private provision and negotiated stopping/transit provision as follows:
  - Public provision 25 pitches
  - Private provision 28 pitches
  - Negotiated stopping 9 pitches



- a recognition that in reality the most accessible sites in Leeds will not always be viable for the delivery of public G&T provision or for G&T to purchase land themselves. The deliverability of sites is therefore included as a criterion to inform the allocation of sites and decision taking.

#### 4. Site Allocations Plan

4.1. The Core Strategy identified levels of G&T need for public and private provision. The majority of the need arises from locally based G&T already living in Leeds. Much of the private provision was considered as “concealed” need and some arose from G&T living in bricks and mortar housing, but with a preference for a private pitch. Having set the pitch provision targets in Policy H7 it is for the Site Allocations Plan to identify sites sufficient to meet the local needs in Leeds. The Core Strategy need figures (in addition to the existing authorised 48 G&T pitches) are:

	<b>Gypsies and Travellers</b>	<b>Showpeople</b>
Public	25	0
Private	28	15
Temporary	9	approx 7 (out of the 15 above)
Sites	4 to 15 sites*	1 or 2
<b>TOTAL</b>	<b>62 households</b>	<b>15 households</b>

\* national guidance and Core Strategy Policy H7 advises that sites should be no larger than 15 pitches. There is a local preference for smaller sites (i.e. around 5 households) which are more widely distributed.

- 4.2. In overall terms the provision for G&T is a very small component of the total housing allocations for the settled community yet carries an extremely high level of controversy. It is therefore important to utilise the legal and national planning guidance which helps support the identification of sites and recognise that the allocation of sites is a key means of addressing many of the local tensions and social issues experienced by the existing local Leeds Gypsy population.
- 4.3. The identification of sites is chiefly via the application of criteria in Policy H7. In addition, the Core Strategy Inspector made a specific point in his report that national guidance requires local planning authorities to ensure that their policies promote “peaceful and integrated co-existence” and that this will doubtless be a factor in choosing sites through the site allocations process. This is an objective which applies to the needs of both the existing settled community as well as the needs of G&T families.

#### Stages of the Site Allocations Plan

4.4. At the time of the Site Allocations Issues and Options consultation (Summer 2013) a specific level of need for G&T was not established and agreed upon. Therefore no sites were proposed for G&T use at the time. However, at Issues and Options stage the Council sought the views of people as to whether any particular sites which were

also being assessed for housing would be suitable for G&T or whether there were any other sites which were suitable which were not being assessed for housing i.e. “a call for sites”.

- 4.5. The council received 172 comments to these questions. 55 comments stated that sites for G&T should be found within the main urban area. 46 individual site suggestions were made throughout the District and these have been considered as part of an assessment. However, there were a number of issues with the “call for sites” submissions:
- no sites were submitted by landowners at Issues and Options consultation stage
  - a number of comments were offensive and racist – these have been removed from the Council’s database and no further consideration has been given to them
  - a number of suggestions were for sites which could not be taken seriously as they were not available e.g. the airport and Millennium Square in the City Centre
  - a number of suggestions were on large housing submissions by private house builders
- 4.6. In parallel to the Issues and Options work for the SAP the Core Strategy was being prepared. As part of this the Council liaised closely with the Leeds Gypsy and Traveller Exchange (Leeds GATE) and representatives of the Showmen’s Guild. Through this consultation a range of sites were proposed to the Council which have been assessed as part of the SAP. In addition, as part of the Leeds local GTAA a survey of G&T was held. In total 115 surveys were completed by local G&T families. A specific question on the survey was around whether there were any sites which would be suitable for G&T accommodation or whether G&T owned any land that they wished to submit to the SAP “call for sites”. This question did not elicit any responses from the 115 households who were surveyed.
- 4.7. Following the Issues and Options call for sites the Council received one submission of a site by a landowner. This was submitted via a planning consultant specialising in G&T accommodation provision throughout the country and is assessed alongside the other sites.
- 4.8. Consultation with Leeds GATE and the Showmen’s Guild has continued throughout the process and following Adoption of the Core Strategy a further meeting was held to encourage Leeds GATE to explore with their local members whether there were additional sites. Officers also visited a Showmen’s site in Doncaster to understand their specific needs.

#### **The approach to assessing sites**

- 4.9. G&T sites vary in terms of size and there is no one size fits all measurement for a pitch or plot. Good practice guidance suggests that G&T sites should provide enough land per household for a mobile home, touring caravan and a utility building,

together with space for the parking of two vehicles. In accordance with the views of consultees, local members and Leeds GATE the Council has looked for a greater spread of smaller sites where around 5 families could be accommodated. The minimum site area required is estimated at 0.3 hectares but some sites could be smaller or larger depending . Sites for Showpeople are usually larger as there is not only the need to store equipment, there is also a desire for more Showpeople to live together so as to ensure greater natural security for their equipment and HGVs.

- 4.10. When identifying suitable sites a range of factors need to be taken into consideration. PPTS states that sites for the short term (first five years of a plan period 2012 - 2017) should be deliverable and that sites, or broad locations, for the medium and longer term (years six to ten (2018 – 2022) and years eleven to fifteen (2023 – 2027/8) should be developable.
- 4.11. For a site to be considered deliverable, it should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that development will be delivered on the site within five years and in particular that development of the site is viable. For a site to be considered developable, it should be in a suitable location for development and there should be a reasonable prospect that that the site is available and could be viably developed at the point envisaged.

### **Assessment Stage One**

- 4.12. In accordance with the Core Strategy, the potential of each site was assessed against the site selection criteria in Policy H7. At the same time, each site was assessed for its deliverability which included an assessment of:
- *Suitability* – does the site meet wider Core Strategy or National Planning policies e.g. on environmental and conservation issues
  - *Availability* – does the site have permission/allocation for another use or has the landowner submitted it for another use as part of the SAP process?
  - *Achievability* – is the site below 2ha or where smaller parcels of larger sites could easily be achieved without prejudicing the remaining site for other uses?
- 4.13. The “long list” assessment included 83 sites comprising:
- Sites which were submitted to the Council through the Issues and Options consultation but not by those who owned the land
  - Sites submitted in consultation with Leeds GATE
  - Sites submitted in consultation with the Showmen’s Guild
  - Sites submitted by private G&T landowners
  - All existing sites in the District without the benefit of full planning permission (unless they were the subject of a planning application at the time)
- 4.14. Many of the stage one sites were simply not available as they had not been submitted by willing landowners. The results of stage one was a potential pool of 13 sites, which were mainly existing tolerated sites but also included a private submitted

site. The potential capacity of these sites would not meet the identified need in Policy H7.

### **Assessment Stage Two**

- 4.15. One of the main means of ensuring that sites are deliverable/developable, is to assess land in the Council's ownership over which it has control, which is surplus to requirements and is suitable for G&T accommodation. Such sites were considered as part of a stage two assessment examining land in Council ownership. The results of stage two were a further 24 sites. These sites were selected on the basis of the tests of suitability, availability and achievability above.
- 4.16. Although Policy H7 of the Core Strategy states that sites in the Green Belt will not be permitted unless other locations have been considered and only then in very special circumstances, if Leeds has an identified unmet need and no available sites elsewhere, this may well constitute very special circumstances.
- 4.17. In general the site search has been a difficult exercise for the following reasons:
- there has only been one submission of a site by its landowner
  - the use of Council land is supported however the Council as landowner must seek best value on its assets, especially in difficult public funding climates.
- 4.18. One of the key messages from the assessment and consultation with stakeholders has been the desire to have smaller sites for a smaller number of families per site. This approach also helps to address some of the concerns raised by the Inspector who considered the Cottingley Springs application and considered that there is an issue with a local resident population feeling overwhelmed by larger sites. It is difficult to set a limit and national guidance advises that sites should be no larger than 15 families. However, the site assessment has been carried out on the basis that small sites for around 5 families would be preferable. The approach to site selection is a balance between suitable sites, locational preferences of the G&T population and impacts on existing areas. An approach to smaller sites means that a greater range of sites are available, there is more prospect of peaceful integration as smaller sites may be easier to assimilate with existing communities and inevitably that there is a greater spread of sites throughout the District.
- 4.19. Consultation with landowners, ward members, Leeds GATE and the Showmen's Guild will be undertaken prior to the publication of these sites for consideration by Development Plans Panel. It is intended that the preferred list of sites will be tabled at the meeting on 24<sup>th</sup> June.

## **Corporate Considerations**

### **4.1 Consultation and Engagement**

4.1.1 The approach set out above would continue the Council's recent positive activities on this issue:

- a Council Scrutiny Board Inquiry was held during 2010 and concluded that the current cycle of unauthorised encampment was not meeting the needs of Gypsies and Travellers, was leading to community tensions and was not delivering value for money in relation to use of the Council's resources. The immediate priority of the Council was to address the housing needs of 12 Leeds based roadside families.
- The Council have secured planning permission for 8 pitches at Kidacre Street for 3 years to meet immediate needs.

4.1.2 The Site Allocations Plan has been prepared with the full engagement and support of Neighbourhoods and Housing and wider City Development service. Neighbourhoods and Housing are responsible for managing public sites and officers have provided views on the suitability of sites during the assessment.

4.1.3 Active consultation with the Gypsy and Traveller community via Leeds GATE and the Showmen's Guild is ongoing as part of the plan making process.

4.1.4 Whilst not considered to be a strategic planning matter the site allocations process for G&T will be set out at the May Duty to Cooperate meeting.

### **4.2 Equality and Diversity / Cohesion and Integration**

4.2.1 Allocating sites for Gypsies and Travellers and Travelling Showpeople in Leeds raises equality issues in terms of access of different groups to housing. These issues will be addressed in an Equality Impact Assessment screening for Executive Board.

### **4.3 Council policies and City Priorities**

4.3.1 Leeds' Core Strategy Policy H7 anticipates releasing enough land to meet Leeds' Gypsy and Travellers housing needs, including a 5 Year Supply. Meeting Leeds' housing needs also forms part of the Vision for Leeds and the aspiration to the 'the best city in the UK'. The adopted Core Strategy takes forward the spatial objectives of the Vision for Leeds and the priorities set out in the City Priority Plans and the Best Council Plan (in particular Objective 2: to 'promote sustainable and inclusive economic growth'). Housing Growth is a City Council 'break through' project. This will be supported through the identification of land and its phasing through the Site Allocations Plan and Aire Valley Leeds Area Action Plan.

#### **4.4 Resources and value for money**

- 4.4.1 This report is concerned with ensuring that Leeds meets the needs of its Leeds-based Gypsies and Travellers and prepares a sound Site Allocations Plan in line with national policy.

#### **4.5 Legal Implications, Access to Information and Call In**

- 4.5.1 The report seeks to ensure that the Council complies with relevant duties as set out in the Housing Act and Planning and Compulsory Purchase Act as amended by the Localism Act.

#### **4.6 Risk Management**

- 4.6.1 This decision will help ensure that the Site Allocations Plan is considered sound by a Planning Inspector. This outcome would lessen the risk of further delay to the plan making process which identifies allocations for settled housing and other land uses.

#### **5.0 Conclusion**

- 5.1 As part of the Site Allocations Plan process the Council has undertaken an assessment of sites to meet the accommodation needs of Gypsies and Travellers, including Travelling Showpeople. For Gypsies and Travellers the requirements set out in the Core Strategy are to make provision for 62 families in Leeds with a split between private, public and negotiated stopping sites.
- 5.2 This report sets out the approach to identifying suitable, available and achievable sites. The Council has identified a number of small sites across Leeds which would accommodate around five families as opposed to a smaller number of sites in specific areas which would accommodate up to fifteen families.
- 5.3 The next stage of the process is consultation with relevant Ward Members and representatives of the Gypsy and Traveller community prior to a preferred site allocations list being prepared for the a meeting of Development Plan Panel on 24th June 2015.

#### **6.0 Recommendations:**

- 7.1 Members of the Development Plan Panel are recommended to:
- i. Note the progress on identifying Gypsy and Traveller sites for the Site Allocations Plan and Aire Valley Leeds Area Action Plan.



Report author: Sarah Welsh

Tel: 2478088

**Report of the Chief Planning Officer**

**Report to Development Plan Panel**

**Date: 19<sup>th</sup> May 2015**

**Subject: Homes for Older People**

Are specific electoral Wards affected? If relevant, name(s) of Ward(s): All.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there implications for equality and diversity and cohesion and integration?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is the decision eligible for Call-In?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does the report contain confidential or exempt information? If relevant, Access to Information Procedure Rule number: Appendix number:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

**Summary of main issues**

1. The adopted Leeds Core Strategy sets out the overall requirements for the location, scale and distribution of housing growth (SP1: Location of Development, SP6: The Housing Requirement and Allocation of Housing Land, SP7: Distribution of Housing Land and Allocations). These requirements have been derived from the evidence base and a full objective assessment of housing needs, which has been found to be sound. This embraces the requirement for all types of housing, including affordable housing and the needs of different groups in the community (such as older and disabled people) (NPPF, para.159).
  
2. Within this strategic context, Policy H4 identifies the approach to Housing Mix to address type and tenure needs locally. It states that this should include the need to make provision for Independent Living. Linked to this, Policy H8: Housing for Independent Living, addresses this need by stating that developments should contribute to supporting needs for Independent Living and that sheltered and other housing schemes aimed at elderly or disabled people should be located within easy distance walking of Town/Local Centres or facilities.
  
3. Whilst all housing sites are capable of contributing to supporting the needs for Independent Living, the Site Allocations Plan (SAP) and Aire Valley Leeds Area Action Plan (AVLAAP) takes this approach further, by identifying sites

that are located within easy walking distance of Town and Local Centres as being particularly appropriate for older or disabled people.

### **Recommendation**

4. Development Plan Panel is invited to comment on and to endorse the overall approach to the identification sites for homes for older people, within the SAP and AVLAAP.



## **1.0 Purpose of this Report**

- 1.1 The purpose of this report is to inform members of how the Site Allocations Plan (SAP) & Aire Valley Leeds Area Action Plan (AVLAAP) will support the housing delivery programme for older people.

## **2.0 Background Information**

- 2.1 The National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG) requires Local Planning Authorities to plan for a mix of housing (including older people), based on current and future demographic trends. The NPPG states that the need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013). Leeds has an ageing population and the need to plan for this is identified in the Strategic Housing Market Assessment (SHMA). The findings of the SHMA are embedded in the Core Strategy housing growth principles. These ensure housing growth targets reflect local housing needs by providing a range of housing options in terms of tenure, type and size, ensures quality of life through the design and standard of new homes, delivers affordable homes, and works with partners to meet housing requirements.
- 2.2 Policy H4 of the Core Strategy (see below) refers to Housing Mix and seeks to ensure that an appropriate mix of dwelling types and sizes are facilitated as part of development proposals, to help address the local population needs. The Policy provides thresholds for when development is required to submit a 'Housing Needs Assessment', to address the local need in terms of housing type and tenure.

### **POLICY H4: HOUSING MIX**

Developments should include an appropriate mix of dwelling types and sizes to address needs measured over the long term taking into account the nature of the development and character of the location. This should include the need to make provision for Independent Living (see Policy H8)

For developments over 250 units, in or adjoining the Main Urban Area and Major Settlements or for developments over 50 units in or adjoining Smaller Settlements, developers should submit a Housing Needs Assessment addressing all tenures so that the needs of the locality can be taken into account at the time of development.

- 2.3 The need to provide a range of housing types and tenure for independent living is expanded further in Policy H8 of the Core Strategy (see below) which states that sheltered or other housing schemes aimed at older persons or disabled people should be located within easy walking distance of Town or Local Centres or have good access to a range of local community facilities. It

reaffirms the Core Strategy's commitment to Independent Living by requiring LDF Allocations documents to identifying land appropriate for this.

## **POLICY H8: HOUSING FOR INDEPENDENT LIVING**

Developments of 50 or more dwellings are expected to make a contribution to supporting needs for Independent Living. Very large scale development will have potential to provide sheltered schemes, as part of a wide housing mix. Smaller developments may contribute in other ways, including provision of bungalows or level access flats.

Sheltered and other housing schemes aimed at elderly or disabled people should be located within easy walking distance of town or local centres or have good access to a range of local community facilities. LDF Allocations Documents should seek to identify land which would be particularly appropriate for sheltered or other housing aimed at elderly or disabled people.

### **3.0 Main Issues**

#### Overview

- 3.1 In recent years promoting independence and providing people with more choice and control over their care and support has been a feature of health and social care legislation. The Care Act (2014) brings together previous legislation and places new duties and responsibilities on local authorities relating to care and support for adults and in particular improving (older) people's independence and wellbeing and preventing the need for increasing care and support. The City Council supports this approach through the 'Better Lives for Older People Programme', which aims to widen the number of housing options available, to ensure that the choices and aspirations of individual older people may be met at each stage of life as age and as dependency advances.
- 3.2 Specialist older persons housing refers to housing for people of 65 years and over. The type of housing for older people ranges from living in an adapted home within the community, sheltered with on-site or of site warden support, 'Extra Care' housing which promotes independent living whilst providing 24 hour access to care, and residential and nursing homes. The benefit of providing specialist housing for older people is that independence can be maintained for longer and wellbeing improved. Older people can now exercise more choice over how they access care. Some may wish to remain in their family homes for as long as possible accessing community support. With the growing number of older old people with chronic long term conditions it is likely that more people will choose to move to live in their own home in a specialist complex where they can access care to suit their needs and avoid admission to residential care.
- 3.3 Extra Care Housing functions as a dwelling, it has its own front door and is either let as a tenancy or available for leasehold purchase. It can come in many built forms, including apartment complexes, bungalow developments and retirement villages. What sets Extra Care homes apart however, is that

the housing complex will have communal facilities that residents and visitors can access and on-site 24 hour care. Regardless of the type of building it is important that Extra Care Housing presents and functions as a domestic rather than an institutional environment. This flexibility allows for 'ageing in place', rather than an older person being required to change their accommodation in order to receive care and health services that can and should be available in the community.

- 3.3 With older people's aspirations rising, regarding the type and quality of housing with care and support, it is likely that demand for traditional residential care will decline. In Leeds as elsewhere, Extra Care is viewed as one of a range of options for older people who are in need of accommodation in which care and support can be received. The development of additional Extra Care Housing in Leeds is essential to ensuring that the needs of a growing older population are met.

Demand and supply

- 3.4 Whilst housing for older people refers to those aged 65 and above, the focus for older persons housing is based on the over 75s, as this is where the greatest need is. The Strategic Housing Market Assessment (SHMA) 2011 anticipates that Leeds will have a significantly greater proportion of older people by 2026 than in 2010, with the greatest increase relating to households aged over 85 years. More recent data from the Sub National Population Projections 2012, notes that in Leeds over the period 2012 to 2028 the numbers of people aged 65+ as a proportion of the population are expected to increase from 15% to 17% and the number of people aged 80+ from 4% to 6%.

- 3.5 The NPPG states that Local Planning Authorities need to assess the future need for specialist accommodation for older people by tenure and type (e.g. sheltered, enhanced sheltered, extra care, registered care) using a number of online tool kits provided by the sector. The Table below sets out the total % over/under supply on a ward basis up to 2028 to cover the Plan period. The table uses 2011 census data to identify the quantity and type of older peoples housing required across the City. This includes the requirement for Extra Care housing, which has been calculated using the Planning for Care model and CLGs 'More Choice Greater Voice' methodology.

Ward	Projected over 75s	2028 % over/under	2028 % over/under	% Over /Under
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		supply – Care Beds without Nursing	supply for Extra Care Housing (ECH)	Supply For Care Beds With Nursing
Armley	2186	1007	-100	-100
Bramley & Stanningley	1967	-100	-17	-100
Calverley & Farsley	2400	-100	-100	-45
Farnley & Wortley	2580	365	-100	-100
Pudsey	2744	326	-100	-66
Headingley	708	634	-100	164
Hyde Park & Woodhouse	697	-100	-100	85
Kirkstall	1840	30	-100	-100
Weetwood	2435	294	-100	-100
Adel & Wharfedale	2944	111	-100	-100
Guiseley & Rawdon	2547	26	59	-34
Horsforth	2698	33	-85	-71
Otley & Yeadon	3127	146	-100	-100
Ardsley & Robin Hood	1669	-100	-100	-100
Morley North	2309	337	-100	-45
Morley South	2135	115	-100	-100
Rothwell	2508	-100	-100	-68
Beeston & Holbeck	1995	-100	-62	-6
City & Hunslet	1375	373	54	239
Middleton Park	2202	286	-100	-100
Cross Gates & Whinmoor	2928	-100	26	-45
Garforth & Swillington	2599	596	-100	-100
Kippax & Methley	2150	426	-100	-11
Temple Newsam	2388	-100	-100	28
Chapel Allerton	1850	149	-100	-4
Moortown	2791	25	86	84
Roundhay	2777	267	-3	162
Burmantofts & Richmond Hill	1840	-100	-13	65
Gipton & Harehills	1478	834	-100	-100
Killingbeck & Seacroft	2428	143	-100	-82
Alwoodley	3105	-100	67	-100
Harewood	2722	-100	-100	-100
Wetherby	2978	-23	-89	-51

3.6 As highlighted above, over and under supply varies across the wards and type of provision. Due to the very different services provided the figures haven't been combined. This is because ECH can be seen as an alternative to residential provision, but the supply and demand of nursing is a different matter and relates to a different service user base (i.e. assessed nursing needs). The programme of work the City Council is undertaking is about re-provision of alternative services and a transition from residential to ECH.

The Site Allocations Plan (SAP) and Aire Valley Leeds Area Action Plan (AVLAAP)

3.7 The majority of housing sites in the SAP and AVLAAP will be able to contribute towards the provision of housing for older people through Core Strategy H4: Housing Mix, and Core Strategy H8: Housing for Independent Living.

3.8 The SAP and the AVLAAP can be used as tools to help address areas of deficiency by identifying suitable sites close to Town and Local Centres in conformity with the Core Strategy. Policy H8 states that sites should be within easy walking distance of Town and Local Centres. A 5 minute walk (400m) is deemed as an acceptable walking distance in the Core Strategy accessibility standards. It is recommended that this is used as a general indicator to identify sites for people aged 65 years and over close to Town and Local Centres (and for these sites to be identified on the SAP and AVLAAP Proposals Maps) but with the understanding that older people (e.g. over 75 years) are likely to be less mobile, are more likely to have impairments or restricted mobility. Consequently, other factors must be taken into account when assessing sites that are suitable for older people including, but not restricted to, proximity of the site to a frequent bus service, topography, and the location of G.Ps and neighbourhood shopping parades. Where appropriate the sites identified are expected to contribute towards delivering older persons housing. This does not preclude other sites from delivering housing for older people as the spatial requirements for the different types of housing for older people vary and they will still be required to satisfy the criteria in Core Strategy Policies H4 and H8.

3.9 Through the preparation and future implementation of the SAP and AVLAAP, officers will continue to work across Council services and with providers, to ensure that the housing needs of older and disabled persons are an integral part of housing growth and delivery.

#### **4.0 Other considerations**

##### Duty to Co-operate

4.1 The adopted Core Strategy has satisfied the Legal and soundness requirements of the Duty to Co-operate. Officers will continue to liaise with Leeds City Region/Neighbouring authorities in the preparation of the SAP and AVLAAP for Publication and Submission.

#### **5.0 Corporate Considerations**

##### 5.1 Consultation and Engagement

5.1.1 The Core Strategy has now been adopted and has been found by an independent Inspector to be sound (this also includes compliance with the Duty to Co-operate and the regulated requirements for public consultation and engagement). The SAP and AVLAAP have been subject to early stages of public consultation and engagement. Following consideration by the Development Plan Panel and Executive Board, the Publication documents will be subject to a further stage of public consultation, prior to submission.

##### 5.2. Equality and Diversity / Cohesion and Integration

5.2.1 In the preparation of the Core Strategy, due regard has been given to Equality, Diversity, Cohesion and Integration issues. This has included the completion of EDCI Screening of the Core Strategy and meeting the requirements of the Strategic Environmental Assessment Directive, which has meant that these Plans are subject to the preparation of a Sustainability Appraisal. The purpose of such Appraisals is to assess (and where appropriate strengthen) the document's policies, in relation to a series of social (and health), environmental and economic objectives. As part of this process, issues of Equality, Diversity, Cohesion and Integration, are embedded as part of the Appraisal's objectives. The site allocation proposals for the SAP and AVLAAP have been subject to EDCI Screening (reported to Executive Board on 11<sup>th</sup> February), further screening is being undertaken of the draft Publication Plans, which will be available in due course.

### 5.3. Council Policies and City Priorities

5.3.1 The Core Strategy, the emerging SAP and AVLAAP, play a key strategic role in taking forward the spatial and land use elements of the Vision for Leeds and the aspiration to the 'the Best City in the UK'. Related to this overarching approach and in addressing a range of social, environmental and economic objectives, where these Plans also seeks to support and advance the implementation of a range of other key City Council and wider partnership documents. These include the Best Council Plan (2013-17) and Leeds Joint Health and Wellbeing Strategy (2013-2015).

### 5.4 Resources and value for money

5.4.1 The preparation of statutory Development Plan Documents is an essential but a very resource intensive process. This is due to the time and cost of document preparation (relating to public consultation and engagement), the preparation and monitoring of an extensive evidence base, legal advice and Independent Examination. These challenges are compounded currently by the financial constraints upon the public sector and resourcing levels, concurrent with new technical and planning policy pressures arising from more recent legislation (including the Community Infrastructure Levy and Localism Act). There are considerable demands for officers, members and the community in taking the Development Plan process forward.

5.4.2 For the Local Development Framework ('local plan') to be as up to date as possible, the Council now needs to produce the SAP and AVLAAP as quickly as possible, following the adoption of its Core Strategy. This will provide value for money in that the Council will influence and direct where development goes. Without an up to date plan the presumption in favour of sustainable development by the Government means that any development in conformity with national policy will be acceptable, regardless of any previous positions of the authority, which could have implications in terms of resources and value for money.

### 5.5 Legal Implications, Access to Information and Call In

5.5.1 The Plans are being prepared within the context of national planning guidance and legislation. No decision is being taken so the reports are not eligible for call in.

## 5.6 Risk Management

5.6.1 None

## **6.0 Conclusion**

6.1 The majority of housing sites in the SAP and AVAAP will be able to contribute in some way towards the provision of housing for older people through Core Strategy H4: Housing Mix, and Core Strategy H8: Housing for Independent Living. Identifying housing sites in the SAP and the AVLAAP that are within easy access of Town and Local Centres is in accordance with Core Strategy Policy H8.

## **7.0 Recommendation**

7.1 Development Plan Panel is invited to comment on and to endorse the overall approach to the identification of sites to accommodate homes for older people, within the SAP and AVLAAP.

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