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## DEVELOPMENT PLAN PANEL

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Meeting to be held in Civic Hall, Leeds, LS1 1UR on  
Tuesday, 21st November, 2017  
at 1.30 pm

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### MEMBERSHIP

#### Councillors

P Gruen (Chair)	C Campbell	B Anderson	T Leadley
M Coulson		G Latty	
C Gruen			
R Lewis			
J McKenna			
F Venner			
N Walshaw			

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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 agree the minutes of the following meetings as a correct record:</p> <ul style="list-style-type: none"> <li>a) 5<sup>th</sup> September 2017 (Copy attached)</li> <li>b) Additional meeting held 3<sup>rd</sup> November 2017 (Copy to follow)</li> </ul>	1 - 6
7			<p><b>CORE STRATEGY SELECTIVE REVIEW HOUSING REQUIREMENT OPTIONS</b></p> <p>To consider the report of the Director of City Development on a specific element of the Core Strategy Selective Review (CSSR) which is currently underway. One of the key actions for the Review is to update the City Council's housing target and the report provides opportunity for Members to comment on the evidence and implications for Leeds.</p> <p>(Report attached)</p>	7 - 18

Item No	Ward	Item Not Open		Page No
8			<p><b>AMENDMENTS TO THE LEEDS SITE ALLOCATIONS PLAN - FURTHER TECHNICAL WORK ON HOUSING ALLOCATIONS AND SAFEGUARDED LAND AND REVISED TIMETABLE</b></p> <p>To consider the report of the Director of City Development setting out a revised approach to progressing housing allocations and safeguarded land within the Leeds Site Allocations Plan through its Examination. The report details how this is necessary to ensure that the Council responsibly reflects a recent Department for Communities and Local Government (DCLG) consultation ('Planning for the right homes in the right places') which incorporated a 'standardised methodology' consultation and new evidence; and ensures that Leeds has a Site Allocations Plan in place as quickly as practicable to provide certainty for investors and communities as part of a plan-led approach. The report sets out the initial scope of a revised approach together with an updated timetable to the SAP Examination for consideration.</p> <p>(Report attached)</p>	19 - 32
9			<p><b>STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT - 2017 UPDATE</b></p> <p>To consider the report of the Chief Planning Officer on the progress and conclusions of the 2017 Strategic Housing Land Availability Assessment (SHLAA) prior to its publication.</p> <p>(Report attached)</p>	33 - 88
10			<p><b>DATE AND TIME OF NEXT MEETING</b></p> <p>To note the date and time of the next meeting as Tuesday 16<sup>th</sup> January 2018 at <u>9.30 am</u></p>	

Item No	Ward	Item Not Open		Page No
			<p><b><u>Third Party Recording</u></b></p> <p>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.</p> <p>Use of Recordings by Third Parties– code of practice</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul>	

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## Development Plan Panel

Tuesday, 5th September, 2017

**PRESENT:** Councillor P Gruen in the Chair

Councillors B Anderson, C Campbell,  
R Grahame, C Gruen, G Latty, T Leadley,  
R Lewis, F Venner and N Walshaw

### **11 Appeals Against Refusal of Inspection of Documents**

There were no appeals against the refusal of inspection of documents.

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

The agenda contained no exempt information.

### **13 Late Items**

No formal late items of business were added to the agenda.

### **14 Declaration of Disclosable Pecuniary Interests**

There were no declarations of disclosable pecuniary interest.

### **15 Apologies for Absence**

Apologies for absence were received from Councillors Coulson, J McKenna and J Procter. Councillors R Grahame and G Latty attended the meeting as substitutes.

### **16 Minutes**

**RESOLVED** - That the minutes of the Development Plan Panel meeting held on 18<sup>th</sup> July 2017 be approved.

### **17 Matters Arising**

Minute 7 Negotiated Stopping Sites for Gypsies & Travellers –

- In respect of whether the views of independent Counsel had been sought on the issue, one Member briefly reported on the Scrutiny Board (Environment & Neighbourhoods) Inquiry of January 2011 and made a copy of the relevant legal advice from the Inquiry available to the Panel's Legal Adviser.
- Members also requested a follow up on two issues raised at the meeting
  - the number of occurrences of stopping on unauthorised sites during the previous year
  - an indication of when the 24 hour service to respond to negotiated stopping would be implemented

It was agreed that a written response would be provided to Panel Members prior to the next meeting.

### **18 Core Strategy Selective Review**

The Panel considered the report of the Director of City Development on the progress made preparing the Core Strategy Selective Review.

The Planning Strategy Team Leader introduced the report which included the headlines from the Strategic Housing Market Assessment (SHMA), feedback from

the public consultation on the scope of the Review and initial ideas on the review of policies. In introducing the report, he provided an update on key matters arising from the CSSR for discussion:

SHMA conclusions: The consultants (Arc4 and Edge Analytics) assessed need for housing in Leeds (Objectively Assessed Need) using both the Local Plans Expert Group (LPEG) methodology and the existing National Planning Practice Guidance (NPPG) methodology.

- The LPEG approach - proposed by Government but not yet adopted - calculated 3,456 units per annum or 55,296 over the 16 year Core Strategy period.
- The NPPG calculations gave 2 results:  
3,478 pa/55,648 units - REM2017  
3,783 pa/60,528 units - High Growth

Additional matters to consider included whether to factor in the under-delivery of recent years (the “backlog”) and calculations for the number of dwellings lost. It was stressed that there may be a difference between OAN and any resulting plan requirements.

Affordable Housing: Using the NPPG methodology the SHMA identifies a need of 1230 affordable dwellings per annum for Leeds, with roughly two thirds required to be provided at social rent levels and one third as intermediate tenures. Consideration to be given to the figures for the four affordable housing zones;

Outer North Zone 1: 120 pa

Outer South Zone 2: 794 pa

Inner Zone 3: 168 pa

City Centre Zone 4: 148 pa

The report detailed the exercise undertaken to identify the % of affordable dwellings needed per zone within the SAP: Zone 1: 53%; Zone 2: 168%; Zone 3: 61% and Zone 4: 52%. It was felt that an increase in current targets for Affordable Housing could be justified on the basis of need, but viability testing will also be necessary.

Housing Needs: Responses from the consultants on the housing needs of each HMCA were awaited however the results of the SHMA suggested a greater need for smaller size affordable properties – of the 1230 total it suggested that 853 need to be 1 & 2 bed size, 238 3+ bed size and 139 designed for elderly occupation.

Additionally, there is a need for a minimum of 17.5% of new dwellings to be built to M4 (2) building regulation accessible standards and 5% M4 (3) building regulation wheelchair standards.

Consultation Responses: 69 had been received, with two received late – from Wetherby Town Council and the Environment Agency (raising issues regarding SP6, flooding and greenspace). The overall headlines from the responses were précised as being that Community Groups welcomed the lower housing requirement whereas Developers expressed concern about the timing of the Strategic Review prior to the adoption of the Site Allocations Plan; issues regarding viability and seeking exemptions from affordable housing/standards requirements

The Panel acknowledged the report provided reassurance that the CSSR was on-track and making progress and welcomed the proposal to hold an informal workshop prior to the November Panel meeting in order to discuss the issues in detail.

In respect of the SHMA, the Panel recognised that it was a good achievement to get the conclusions completed of this highly complex and potentially contentious piece of evidence, with good engagement with the public and external organisations. The Panel went on to identify and discuss the following key matters:

### **Strategic Review Timetable**

- The timing of the Strategic Review alongside the submission of the Site Allocations Plan. Officers responded that the SAP Examination would have regard to the adopted Core Strategy requirements; however the Inspector was aware of the ongoing CSSR. It was noted that the Inspector had issued further questions to LCC the previous week seeking views on the emerging CSSR figures but as these were incipient and untested, they could not legally be relied upon but would provide contextual information to the SAP Inspection.
- Members were reassured that the Local Development Framework did allow for the twin-tracking of plan progression.
- A key challenge was how best to present technical information on the planning process to the public.
- Residents sought clarity over whether a decreased housing target would result in less house development in their area.
- As the CSSR progresses, with the Inspector reviewing the SAP against existing Core Strategy targets, there was a possibility that the city would have a number of “surplus” sites – which would not be needed to meet the emerging Core Strategy revised housing requirement – and some consultees would wish to see the surplus sites removed. Members noted the response that, at the moment, the difference between the number of dwellings proposed in the SAP and the emerging Core Strategy revised housing requirement was unknown. In any case the length of the plan period being extended to 2033 means that it is likely that all sites will be needed over the longer period.

In response to the comments regarding clarity and information for residents, officers agreed to produce a Frequently Asked Questions document for Members and general publication, once the Authority had responded to the Inspector’s questions.

### **Delivery Targets**

- It was acknowledged that the emergent lower target will help the Council to demonstrate a 5 year housing land supply as it gains more weight through the preparation of the CSSR
- One Member expressed concern that the adoption of a delivery target at the higher end of the calculations could result in a backlog of development, and inability to demonstrate a 5 year land supply which would have the knock-on effect of developers seeking early release of other land for development.
- Comments on the findings and impact of recent appeal decisions regarding 5 year land supply were noted, particularly the impact on decision making at area Plans Panels. Although the response that the SAP held more weight now that it had been submitted for inspection was noted, Members were keen to

resolve this dichotomy in order to secure the delivery of quality developments in Leeds.

- Additionally, a request to invite the Head of Development Services to future DPP meetings in order to gain familiarity with the discussions and tensions between policy making and delivery was noted.

### **Planning Policy**

Views on the National Planning Policy Framework were expressed along with comments that current Central Government planning policy favoured developers and made it difficult for local planning authorities to defend their local policies seeking quality developments in sustainable locations.

### **Housing Standards**

- The proposal to introduce housing targets was broadly welcomed as an opportunity to improve the quality of new housing in Leeds whilst retaining focus on housing standards, quality of build and the shape of the city alongside housing need and allocations.
- Members were mindful of the viability arguments put forward by some developers, however remained fully supportive of the local policies established to secure the “Leeds Standard” in terms of space around dwellings; minimum size requirements; quality and amenity.
- Officers reported that Housing Standards now formed part of the CSSR and would carry more weight than the former Supplementary Planning Document
- The view that all new build homes should be accessible was expressed
- Access considerations should also be considered in terms of location – isolated developments with no supporting services (such as retail) would not be good for sheltered accommodation or homes for residents with specific/mobility requirements
- Members requested that the Chief Planning Officer be invited to attend the proposed workshop in order to present information on policy compliance.

### **Housing Mix**

- A review of the Affordable Housing requirements for each of the zones was required as these had been set when the housing market was weaker. One Member reported Islington Council successfully operated a 50% Affordable Housing requirement.
- The needs of specific groups – such as older residents and young people – to be considered. A suggestion was made to invite Regeneration Officers to the proposed workshop to discuss sheltered housing provision in regeneration proposals.
- A review of the city-wide Community Infrastructure Levy requirements could identify whether the requirements remained appropriate for each area and assess the impact of CIL on redevelopment. Officers indicated that the CSSR viability testing would include a commentary on CIL.
- Consideration of the policy for Commuted Sum use and whether there was any flexibility and support for cross-ward financing. A comment that commuted sums generally did not deliver the units required was noted along with suggestions to undertake reviews of the calculation mechanism and best practice operated elsewhere.

In conclusion, the Panel supported the proposal to hold an informal workshop prior to the next November Panel meeting. It was agreed that an outline of the themes proposed for discussion would be sent to Panel Members once the date was set.

**RESOLVED**

- a) That the contents of the report be noted;
- b) To note the intention to hold an informal workshop for Panel Members and relevant officers on the key themes of the Core Strategy Selective Review;
- c) That the comments made during discussions be noted and be used to inform the key themes of the proposed workshop;
- d) To note the intention to invite the following officers to the proposed workshop: The Chief Planning Officer, the Head of Development Services, and relevant Regeneration Officers.
- e) To note that in response to the comments regarding clarity and information for residents, a Frequently Asked Questions document would be produced, once the Authority had responded to the SAP Inspector's questions.

**19 Date and Time of Next Meeting**

**RESOLVED** - To note the date and time of the next meeting as Tuesday 21<sup>st</sup> November 2017 at 1.30 pm.

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Report authors: Robin Coghlan  
Tel: 0113 378 7635

## Report of Director of City Development

### Report to Development Plan Panel

**Date: 21<sup>st</sup> November 2017**

### **Subject: Core Strategy Selective Review Housing Requirement Options**

Are specific electoral Wards affected? If relevant, name(s) of Ward(s):	<input type="checkbox"/> Yes	<input checked="" 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 Core Strategy Selective Review (CSSR) is underway and Members have agreed the scope of the Review and provided comments, via a workshop on the specific strands of work. One of the key actions for the Review is to update the City Council's housing target – currently at 70,000 (net) homes between 2012 – 2028 and considered to not reflect the latest evidence or performance of the housing industry.
2. The evidence of the Strategic Housing Market Assessment 2017 and the recent consultation by the Department of Communities and Local Government (DCLG) generates different housing requirement figures for Leeds ranging between 42,000 and 60,000, based on the latest evidence, over the plan period of 2017 - 2033.
3. This report sets out options for consideration by Development Plan Panel prior to the drafting of specific housing policies for consultation. Development Plan Panel are invited to make comments on these options and the recommended approach to the housing requirement in the Publication Draft of the CSSR.
4. The drafted publication policies for all aspects of the CSSR will be brought to Development Plan Panel in December for consideration and recommendation to Executive Board that the publication draft policies be subject of public consultation under Regulation 19 of the Town and Country Planning Act.

## **Recommendations**

5. Development Plan Panel is invited to comment on the housing requirement options put forward in this report and the recommended approach.

## 1 Purpose of this report

- 1.1 This report sets out the options for Leeds' housing requirement over the period 2017 – 2033 and provides opportunity for Members to comment on the evidence and implications for Leeds.

## 2 Background information

- 2.1 The housing requirement is a key element of the Core Strategy Selective Review (CSSR) which was approved for commencement by Executive Board in February 2017. The CSSR also includes an update to affordable housing and green space policies, introduces new policies on housing standards (size and accessibility) and updates the sustainable construction / Carbon Dioxide (CO<sub>2</sub>) reduction policies to reflect national advice.
- 2.2 A workshop with Development Plan Panel Members was held on 4th October which considered issues and options relating to the new and revised CSSR policies. At the workshop Members' consensus was that the evidence suggested that a new housing requirement would need to be considerably lower than the current requirement, but there were differing views on the level that the requirement should be pitched.
- 2.3 It is widely acknowledged that the Core Strategy housing requirement was set at the upper end of likely scenarios for the plan period. The Government Inspector's hopes that the national and local economy would swiftly recover from recession have not happened and the CS annual targets have not been met since 2012.

Figure 1 – Completions since 2004

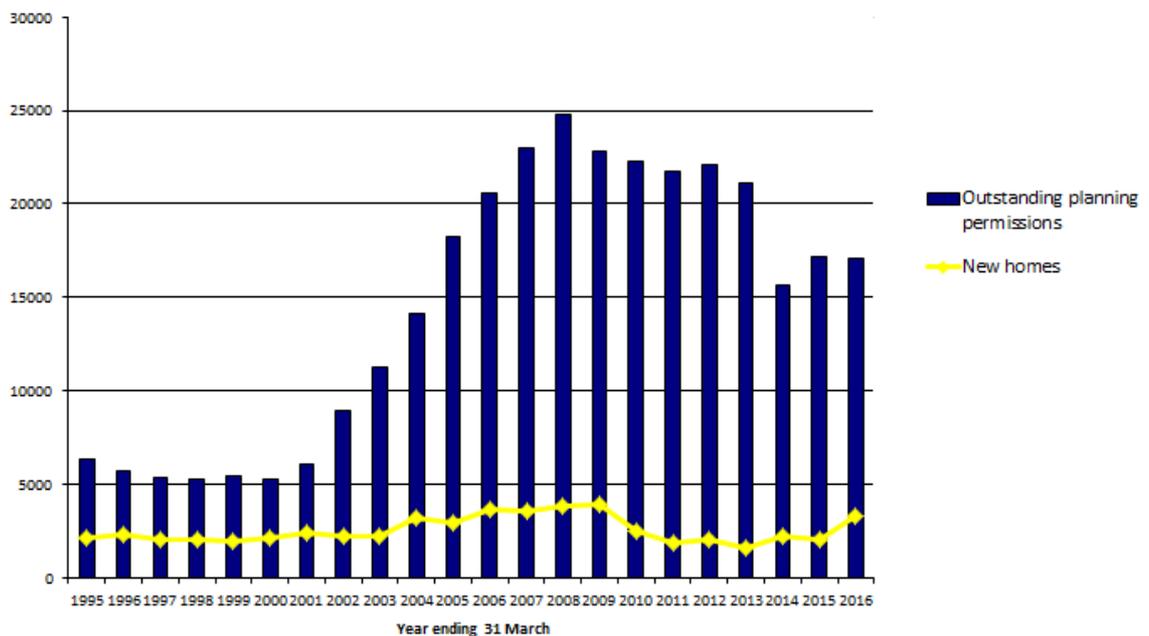
Year	Completions	Targets <sup>1</sup>
2004-5	2,633	n/a
2005-6	3,436	n/a
2006-7	3,327	n/a
2007-8	3,576	n/a
2008-9	3,828	n/a
2009-10	2,238	n/a
2010-11	1,686	n/a
2011-12	1,931	n/a
2012-13	1,801	3,660
2013-14	3,195	3,660
2014-15	2,226	3,660
2015-16	3,296	3,660
2016-17	3,306	3,660

- 2.4 The housing market has struggled through a series of wider economic crises not least the impacts of the uncertainties around the mortgage market review in 2015 and the Brexit referendum in 2016, which saw tangible decreases in quarter on

<sup>1</sup> Note that the Core Strategy target steps up to 4,700 per annum at 2017-18

quarter housebuilding activity in Leeds. This wider national context has been reflected in the Strategic Housing Market Assessment evidence (below) and the Government’s recent consultation on housing needs (*“Planning for the right homes in the right places”*). Notwithstanding that delivery lies below current CS targets there is a considerable level of housing land supply in Leeds. The issue remains the conversion of permissions into completed units. There are 7 planning permissions in place for every new home built (see Figure 2 below) which suggests that house builders are not building to meet CS targets and are responding to a lower level of demand in the market.

Figure 2 – Outstanding planning permissions as compared to new homes delivered between 1995/6 and 2016/17



- 2.5 The CS targets place the Council in an invidious position as regards the Local Plan; because the National Planning Policy Framework advises that a five year housing land supply<sup>2</sup> be in place when measured against these targets or otherwise the Plan policies are deemed to be out of date. At the current time the Council can demonstrate a 4.38 year land supply (see agenda item on the Strategic Housing Land Availability Assessment, ¶3.18).
- 2.6 An updated CS target in the region of 42,000 to 60,000 would enable the Council to immediately exceed a 5 year land supply.

<sup>2</sup> Local authorities are required to demonstrate that they have the equivalent of a 5 year supply of land for housing development (i.e. 5 years worth of their annual target plus a buffer and any backlog) in accordance with paragraph 47 of the National Planning Policy Framework (NPPF).

### 3 Main issues

#### National Policy

- 3.1 On the issue of how local authority housing requirements should be set, national planning policy is currently in an interregnum awaiting expected new policy and guidance in April 2018. Until new national policy is issued, the current National Planning Policy Framework (NPPF) and supporting Practice Guidance requires that local planning authorities identify the full “Objectively Assessed Need” (OAN) for housing in their areas, and that Local Plans translate those needs into a housing requirement and land provision targets.
- 3.2 OAN is not defined by Government, however the NPPF sets out a current methodology as follows. Local authorities start with the national population and household projections and then take into account a comprehensive set of factors that produce a full evidence based assessment of housing need. Factors include local population and migration variations, household formation rates, economic/employment growth forecasts and market sensitivities including particular unmet needs for affordable housing.
- 3.3 However, as a result of the Government’s current consultation proposals it is understood that the OAN is now set by the standard methodology (which is the new basis for assessing local housing need) and any deviation from that (higher or lower) is a local choice around setting a housing requirement.
- 3.4 Concerned that too many examinations and planning inquiries were being stalled due to complexities of housing numbers, DCLG commissioned the Local Plans Expert Group<sup>3</sup> (LPEG) to devise a simpler methodology for calculating housing requirements. LPEG published a report in March 2016 which set out a simplified methodology, but one that still had regard to employment growth and one or two other considerations.
- 3.5 DCLG then published a consultation “Planning for the right homes in the right places” in September 2017. Unexpectedly this put forward an extremely simplified methodology which starts with sub-national household projections and makes one adjustment for local house price/income affordability ratios. Using this methodology provides for Leeds a figure of 2,649 dwellings per annum which would generate a requirement of 42,384 over the plan period 2017 – 2033. Notwithstanding that methodology, the consultation paper says that local authorities may plan for higher numbers. Paragraph 46 says:

*“Plan makers may put forward proposals that lead to a local housing need above that given by our proposed approach. This could be as a result of a strategic infrastructure project, or through increased employment (and hence housing) ambition as a result of a Local Economic Partnership investment strategy, a bespoke housing deal with Government or through delivering the modern Industrial Strategy. We want to make sure that we give proper support*

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<sup>3</sup> The Local Plans Expert Group was established by the Communities Secretary, Greg Clark and the Minister of Housing and Planning, Brandon Lewis MP, in September 2015, with a remit to consider how local plan making can be made more efficient and effective.

*to those ambitious authorities who want to deliver more homes. To facilitate this we propose to amend planning guidance so that where a plan is based on an assessment of local housing need in excess of that which the standard method would provide, Planning Inspectors are advised to work on the assumption that the approach adopted is sound unless there are compelling reasons to indicate otherwise.”*

- 3.6 The CSSR will not be submitted for examination until after the expected issue of new national policy and guidance, which means that the new methodology is likely to be what the CSSR will be tested against.

### Local Evidence

#### The housing requirement for 2017 - 2033

- 3.7 The Council commissioned consultants Arc4 and Edge Analytics to undertake a complete Strategic Housing Market Assessment (SHMA) for Leeds in January 2017. Preparation of the SHMA followed the national planning policy framework in assembling evidence of “objectively assessed need” and followed the national practice guidance in terms of methodology. In addition, the SHMA 2017 sought to anticipate the Government’s stated intention to introduce a simpler method for calculating affordable housing. It produced a calculation of the housing requirement using the methodology advanced by the LPEG set up to advise the Government on a new simple methodology (see para 3.1.2 above). The LPEG methodology generated a figure of 55,296 homes (3,456 homes per annum).
- 3.8 The process of preparing the SHMA aimed to be as inclusive as possible by meeting with a “reference group” representing a wide range of local housing interests. It met at the outset of the process to share the proposed methodology and again to share interim findings before finalisation. Data and information was gleaned not only from the standard sources of national and local data, but also through a household survey which was circulated to nearly 28,000 households and received a healthy 15% return (including on-line responses). A number of stakeholder consultation sessions were held with specialist groups and an online survey aimed at a range of professional interests.
- 3.9 The results of the SHMA 2017 offer a very thorough understanding of Leeds’ housing needs and its relationship with job growth and commuting. It provides two objectively assessed housing need figures based on different levels of employment growth. The “REM 2017” figure uses the employment growth forecast in the March run of the Regional Econometric Model<sup>4</sup>. With other adjustments for headship rates<sup>5</sup> and market signals the REM 2017 scenario has an annual housing need figure of 3,478 dwellings (55,648 over the plan period). The High Growth scenario uses a more aspirational forecast of employment growth aligned to the Leeds Inclusive Growth Strategy 2017 – 22. With the other adjustments, the High Growth

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<sup>4</sup> The REM is hosted by the Regional Economic Intelligence Unit for the West Yorkshire Combined Authority and looks at 30 employment sectors and national and local market factors to model future job growth consistently across the West Yorkshire local authorities.

<sup>5</sup> Headship rates are the number of adults per household and are a means of assessing whether there is pressure on household formation or not. Where more than three adults are present in one household there may be an unmet need e.g. adult child still living at home.

scenario has an annual housing need figure of 3,783 dwellings (60,528 over the plan period).

Housing Requirement Options for Leeds

- 3.10 Based on the DCLG consultation (which sets the OAN for Leeds) and the SHMA 2017 (which generates local housing requirement options) three housing figures can be easily identified for consideration:

OAN / Requirement Scenario	Annual Figure	Plan Period Figure
DCLG Consultation (OAN)	2,649	42,384
SHMA REM 2017	3,478	55,648
SHMA HIGH GROWTH	3,783	60,528

- 3.11 These figures have ready justifications and warrant further exploration of their impacts and merits, see below. The LPEG figure (as noted in ¶3.5 above) was calculated as 55,296 homes but given the DCLG consultation has no validity as a methodology in its own right. It can be seen that the gap between the DCLG base figure and the REM 2017 figure is significant. The Council have therefore examined the findings of the SHMA and sought to ensure alignment of the assumptions therein with the latest Government advice.

- 3.12 The LPEG recommends that the headship rates from the latest household projection model (i.e. 2014-based) are adjusted in the context of 2008-based rates. This effectively means adding an uplift on the basis that household formation would return to pre-recession levels particularly amongst the age group commonly referred to as “millennials”. The SHMA sought to accommodate a partial return to such levels in line with the LPEG methodology. However, it is important to note that recent trends in Leeds provide no evidence that headship rates will return to the rate of pre-2014. Moreover, there is no suggestion in the latest Government consultation that the baseline figure should be uplifted for this factor. Removing the uplift of Partial Return of Headship Rates (231 dwellings p.a.) would give a figure of 51,952.

- 3.13 This figure is considered to be a valid scenario on the basis of headship rates outlined above. It is further broadly corroborated because in simple terms it lies around the mid-point between 42,384 (CLG base) and 60,528 (High Growth).

OAN / Requirement Scenario	Annual Figure	Plan Period Figure
DCLG Consultation (OAN)	2,649	42,384
SHMA ADJUSTMENT	3,247	51,952
SHMA REM 2017	3,478	55,648
SHMA HIGH GROWTH	3,783	60,528

- 3.14 Whilst it is not considered that headship rate will never return to pre-2011 levels there is caution about allowing further uplift for a factor that currently has no evidential basis. With an improving job market, the share of young adults living in their parents’ homes may fall. If this happens and young adults move out of their

parents' spare bedrooms headship rates in the future will change. This can be captured and reflected in future analysis. One of the characteristics of the latest Government consultation is the ability to respond more quickly to changes in evidence and the Government advises that plan targets be reviewed every five years.

### Further Adjustments

- 3.15 It should be noted that a further adjustment to take account of future demolitions is required to convert the figure to a gross housing requirement. Evidence suggests this should be 150 dwellings p.a. (2,400 homes over the plan period) which is lower than the 250 dwellings p.a. in the adopted Core Strategy. A reduction is justified given the evidence of a reduced rate of housing clearance programmes at the current time. Should such programmes be re-introduced there would be scope to re-adjust the figure.
- 3.16 To determine the quantity of housing supply to be achieved through identifying and allocating sites, a windfall allowance can be deducted from the housing requirement. If the windfall allowance of 500 dwellings p.a. is used, which was agreed in the adopted Core Strategy, 8,000 dwellings can be accounted for through other means and therefore removed from the target for the plan period when assessing the level of land needing to be allocated.
- 3.17 It is not considered appropriate to include backlog against previous Core Strategy targets (2012 to 2017). This is not required by the NPPF, was not constrained by a lack of housing supply (as figure 2 demonstrates) and is not recommended by the SHMA consultants.

### Implications and Considerations of the Objectively Assessed Need options

#### The implications of revised requirements on allocation targets

- 3.18 It is generally accepted that the OAN, as its name indicates, should be derived from objective analysis of the evidence. Once done there are supply-side factors such as local strategy, physical constraints, policy designations and adverse impacts of development which local planning authorities may take into account. However, at the current time national guidance is clear that the full objectively assessed needs should be met unless they can be accommodated elsewhere i.e. in neighbouring authorities.

OAN Figure	Annual Figure (net) <sup>6</sup>	Plan period (net)	Land to Allocate <sup>7</sup>	Illustrative 5 year supply <sup>8</sup>
DCLG Consultation	2,649	42,384	36,784	11 years
<b>Requirement Figures</b>				
SHMA ADJUSTMENT	3,247	51,952	46,352	9 years
SHMA REM 2017	3,478	55,648	50,048	8 years
SHMA HIGH GROWTH	3,783	60,528	54,928	7 years
<b>Illustrative Current Position</b>				
CORE STRATEGY 2014	4,700	70,000	66,000	4.3 years <sup>9</sup>

3.19 Given the current consultation it should be noted that there is some uncertainty

#### DCLG Consultation Figure

- At 2,649 (42,384) dwellings, this is the lowest figure, which would create less need for greenfield and Green Belt releases as all housing could be accommodated on brownfield land in the main urban area and major settlements. However, this would ignore the need for a spatial distribution of housing to meet local needs locally. There are therefore significant issues regarding the extent to which this figure fulfils the Council's inclusive growth strategy ambitions. Also, the extent to which this figure fully reflects the needs for affordable housing across the City is underplayed (it doesn't reflect the conclusions of the SHMA 2017, which has again highlighted that affordability is a key issue in Leeds, and would on that basis provide an insufficient level of market housing from which to secure affordable housing obligations). The SHMA analysis of matching local housing needs with expected rates of economic growth means that under this scenario it is likely that insufficient homes would be provided to meet the needs of a growing economy. In such a scenario there may be significant consequences: employers would find it harder to recruit in Leeds and potentially locate elsewhere and/or employees would increasingly live outside of Leeds and commute in to access jobs. This would in turn place pressure on the strategic road, rail and bus network and is considered to

<sup>6</sup> This is the figure against which the 5 year housing land supply will apply

<sup>7</sup> The land to allocate = the net OAN figure plus an allowance for demolitions (+2,400) minus windfall allowance (-8,000)

<sup>8</sup> When assessed against the SHLAA 2017 supply of 29,383 houses (with backlog 2012-2017 removed and a 5% buffer applied)

<sup>9</sup> Including backlog (4,476 homes) and 20% buffer

be strategically unsustainable. These issues can be further discussed through Duty to Cooperate arrangements.

### SHMA Adjustment Figure

- The 3,247 (51,952) figure would reduce the previous needs for Green Belt release albeit there would remain a necessity for some release as there would be insufficient alternative land to meet needs for the new plan period. As it is based on the SHMA 2017 scenario with an adjustment to remove an uplift for headship rates it would accord with the most realistic estimates of Leeds' economic growth prospects and ability to meet housing needs. It would also withstand peaks and troughs of economic cycles.

### SHMA 2017 Figure

- The 3,478 (55,648) figure would reduce the need for greenfield and Green Belt releases somewhat albeit there would remain a necessity for some release as there would be insufficient alternative land to meet needs for the new plan period. It accords with realistic estimates of Leeds' economic growth prospects and would be able to meet housing needs comfortably. It would also withstand peaks and troughs of economic cycles.

### SHMA HIGH GROWTH Figure

- The 3,783 (60,528) figure would minimally reduce the previous needs for Green Belt release when looked at over the revised plan period. It accords with the most optimistic estimates of Leeds' economic growth prospects which is a similar approach to that taken in the Core Strategy and would provide ability to meet housing needs reasonably well. However, it is susceptible to market failures and the inability of the house building industry to build at such scales consistently.

### Housing Distribution: Consequential Amendments to Policy SP7

- 3.20 Policy SP7 of the Core Strategy 2014 divides the total dwelling supply for allocation (66,000 dwellings) into different geographical areas. It sets out the number and percentages of dwellings that should be allocated in different parts of the Settlement Hierarchy (City Centre, Main Urban Area, Major Settlements and Smaller Settlements) and in the different Housing Market Characteristic Areas (HMCAs).
- 3.21 If Policy SP7 were not amended, the numbers of dwellings for the different geographical areas would be too high for the new housing requirement. This means it would make sense and avoid confusion if the absolute numbers currently stated in the policy were deleted from the tables of Policy SP7.
- 3.22 Regarding the percentages for the Settlement Hierarchy including percentages for infill and urban extensions, these will no longer be achievable with the lower

housing requirement and may not serve any beneficial planning purpose. This means it would make sense to delete the Settlement Hierarchy table altogether from Policy SP7.

- 3.23 In contrast, the percentages for the HMCAs will largely be achievable with the lower housing requirement. Keeping the HMCA percentage targets of SP7 would concur with the wider spatial strategy of the Core Strategy as expressed in the Vision and Policy SP1. This can be summarised as a balanced provision of brownfield and greenfield land (Vision paragraph 3.2), sustainable growth related to the Settlement Hierarchy with the scale of growth reflecting the size, function and sustainability of the settlement (Spatial Policy 1) and selective use of Green Belt land where this provides the most sustainable option. A balanced mix of sites including greenfield and brownfield is part of that strategy. A good geographic spread of sites associated with settlements of the Settlement Hierarchy will help secure delivery of housing to meet the varied needs of Leeds residents. Keeping the HMCA percentage targets would also concur with the conclusion of the Member workshop that it would be appropriate to keep the HMCAs as a means for securing a balanced distribution of the housing supply.

## **4 Corporate Considerations**

### **4.1 Consultation and Engagement**

- 4.1.1 Preparation of development plan documents, including the selective review of the Core Strategy is subject to the provisions of the Town and Country Planning (Local Planning) Regulations which require a minimum level of public consultation as well as the Council's Statement of Community Involvement. The consultation on the scope of the review was carried out for 6 weeks from 19th June until 31st July 2017. It involved notifying statutory consultees, neighbouring local authorities and people / organisations who had commented on the original Core Strategy. A consultation statement set out the proposed scope of the selective review and invited representations on the topics proposed and on whether other parts of the Core Strategy should be reviewed and why. Details were provided on the Council website and in Libraries and One Stop Shops were notified.

- 4.1.2 An explanation of the proposed consultation for the Publication Draft was set out in the report to Development Plan Panel of 5th September 2017.

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

- 4.2.1 The council will need to consider any impacts that new planning policy is likely to have on equality, diversity, cohesion and integration. An Equality Impact Assessment will be prepared for the Publication Draft stage of plan preparation.

### **4.3 Council policies and Best Council Plan**

- 4.3.1 The Best Council Plan 2017-18 is relevant in terms of its priorities for Good Growth, Health & Wellbeing, Resilient Communities, Better Lives for People with Care & Support Needs and Low Carbon. The quantity of homes that Leeds plans for will have ramifications for economic growth, but also meeting needs of a growing population. The CSSR will also have ability to improve the range and quality of

dwellings delivered to ensure the needs of particular groups such as the elderly are met, and that health and wellbeing of residents is improved. Provision of new greenspace in association with new housing developments is also important

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

4.4.1 Preparation of the CSSR will be met from existing budgets.

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

4.5.1 The CSSR follows the statutory Development Plan process in accordance with The Town and Planning County Planning Act 1990, Planning and Compulsory Purchase Act 2004 (as amended), The Environmental Assessment of Plans and Programmes Regulations 2004, Town and Country Planning (Local Planning ) (England) Regulations 2012 (as amended) , Localism Act 2010, and associated legislation. Once adopted the Plan will form part of the Council's statutory Local Plan.

4.5.2 The report is not eligible for call in, in line with the Executive and Decision Making Procedure Rule 5.1.2 – the power to call-in decisions does not extend to those being made in accordance with the Budget and Policy Framework Procedure Rules. The Plan will need to be considered by Scrutiny Board (City Development) in accordance with the Budget and Policy Framework Procedure Rules.

#### **4.6 Risk Management**

4.6.1 The Government is currently in the process of reviewing national planning policy concerning housing matters. A white paper was published at the start of 2017 followed by a consultation paper on calculating local housing requirements in September 2017. There is a risk the changes to national policy expected to be confirmed in April 2018 could make the CSSR Publication Draft proposals out of line with national policy. To reduce this risk officers have tried to anticipate the direction of travel as closely as possible. Also, the City Council will have a further opportunity to bring the CSSR back to accord with national policy in the Submission Draft which is anticipated in summer 2018.

#### **5 Conclusions**

5.1 The report sets out four credible housing requirement options for Leeds with considerations of the pros and cons of adopting each one. The two middle figures of 51,952 and 55,648 dwellings would represent significant reductions on the current requirement of 70,000, but would accord with the best current forecasts of economic and employment growth in Leeds. The low DCLG figure of 42,384 could be harmful in constraining future economic growth. The HIGH GROWTH scenario is considered to be too susceptible to market fluctuations.

#### **6 Recommendations**

6.1 Development Plan Panel is invited to comment on the housing requirement options put forward in this report.



Report author:  
Martin Elliot 0113 378 7634

**Report of Director of City Development**

**Report to Development Plan Panel**

**Date: 21<sup>st</sup> November 2017**

**Subject: Amendments to the Leeds Site Allocations Plan – further technical work on housing allocations and safeguarded land and revised timetable**

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 Leeds Local Plan sets out a vision and a framework for the future development of the City. It is made up of a number of separate documents at different stages of preparation: a Core Strategy, Natural Resources and Waste Plan, the saved policies of the Unitary Development Plan, Site Allocations Plan and Area Action Plan for the Aire Valley.
2. These Local Plan documents are a critical tool in guiding decisions about individual development proposals because they (together with any Neighbourhood Plans that have been made) form the starting point for considering whether planning applications can be approved. It is important to put an up to date plan in place to positively guide development decisions, attract investment in the City, plan for the right infrastructure in the right places and provide residents with certainty about what is happening in their local communities. It is also vital that the Local Plan documents are right for Leeds; are prepared in line with the legal and guidance frameworks of Government, reflect up-to-date evidence and reflecting the views of individual local communities.
3. This report sets out a revised approach to progressing housing allocations and safeguarded land within the Leeds Site Allocations Plan through its Examination. This is necessary to ensure that the Council responsibly reflects a recent Government consultation and new evidence therein, and to ensure that Leeds has a SAP in place

as quickly as practicable to provide certainty for investors and communities as part of a plan-led approach. Within this context, the DCLG consultation ('Planning for the right homes in the right places') incorporating a 'standardised methodology', suggests that the housing need in Leeds is to reduce when compared to that in the adopted Core Strategy and therefore despite being considered sound, the Site Allocations Plan may in its current form result in Green Belt being released for housing which is ultimately not required in the long term.

## **Recommendations**

4. Development Plan Panel is invited to:
  - i. Note the update on further technical work on housing and Green Belt and revised timetable for the hearing sessions of the SAP Examination
  - ii. Consider the revised approach to Green Belt sites in the Submitted SAP and the consequent continued allocation of a selection of those sites, alongside the designation of Broad Locations for the remainder
  - iii. Recommend to Executive Board that the Submission Draft SAP be amended to reflect this revised approach and be subject to public consultation prior to submission to the Secretary of State

## **1 Purpose of this report**

- 1.1 This report sets out a revised approach to progressing housing allocations and safeguarded land within the Leeds Site Allocations Plan through its Examination. This is necessary to ensure that the Council responsibly reflects a recent Government consultation and new evidence therein, and to ensure that Leeds has a SAP in place as quickly as practicable to provide certainty for investors and communities as part of a plan-led approach. Within this context, the DCLG consultation ('Planning for the right homes in the right places') incorporating a 'standardised methodology', suggests that the housing need in Leeds is to reduce when compared to that in the adopted Core Strategy and therefore despite being considered sound, the Site Allocations Plan may in its current form result in Green Belt being released for housing which is ultimately not required in the long term.
- 1.2 This report sets out the initial scope of a revised approach together with an updated timetable to the SAP Examination for consideration. This report follows on from a report to Development Plan Panel (DPP) on 3rd November which set out the reasons for the revised approach and the broad methodology to be used.

## **2 Background Information**

- 2.1 The report to DPP on 3rd November highlighted the potential effect that Government's recent consultation on housing needs could have on the Site Allocations Plan (SAP), which is now at Examination. In order to ensure a responsible approach to protection of the Leeds Green Belt and so as to ensure that the Local Plan is up to date, a revised approach was set out as the most preferable against alternatives.
- 2.2 The SAP was submitted to the Secretary of State in May 2017 and he appointed two Inspectors to examine the plan. This Examination is ongoing following Hearing sessions in relation to Employment Land, Green Space, Retail and accommodation for Gypsies, Travellers and Travelling Showpeople in October.
- 2.3 The amount of housing land that the SAP needs to provide is the equivalent to 66,000 homes (as set out in the Core Strategy Policy SP6). The SAP was submitted on the basis that it provided land for 67,817 homes (an overall surplus of 1,817 homes based on the status of sites at 1st April 2016). This land was made up of three categories:
- Leeds Unitary Development Plan allocated housing sites which have yet to be delivered – categorised as "identified sites" under SAP Policy HG1
  - Unimplemented sites with planning permission for housing (or where permission had recently expired but the sites remained suitable for housing) – categorised as "identified sites" under SAP Policy HG1
  - New allocations for housing – categorised as "allocated sites" under SAP Policy HG2
- 2.4 On 13th September 2017 the Council updated the Inspector with the planning status of sites at 1st April 2017. The result of the calculations increases the overall surplus of potential delivery against Core Strategy Policy SP6 from 1,817 to 3,297 units. This update reflected the changed status (from safeguarded land to "identified" sites

with permission) of land where permission was granted on appeal at Grove Road, Boston Spa; Leeds Road, Collingham; Bradford Road, East Ardsley and Sandgate Drive, Kippax.

- 2.5 Further changes to the status of UDP Protected Areas of Search (PAS) is necessary to reflect the Council's Plans Panel decision to grant planning permission on land at Low Moor Side, Farnley for 130 homes before the submission of the SAP. This increases the overall surplus of potential delivery against Core Strategy Policy SP6 from 3,297 to 3,426 units i.e. 69,426 units. This is a marginal buffer of 5% which may provide for flexibility and choice.
- 2.6 Incorporated within this number of units, are 700 homes on the former Green Belt site at Skelton Gate in the Adopted Aire Valley Leeds Area Action Plan.

### **3 Main issues**

- 3.1 When the Council submitted the SAP to the Secretary of State for independent Examination it was of the view that the Green Belt release for 12,385 homes was sound and appropriate. This was on the basis that: it was needed to ensure that opportunities for new homes existed throughout Leeds; there was not enough brownfield land to meet housing needs in all communities and where brownfield land was in good supply (e.g. in the City Centre and inner area) there was already a commitment to over-deliver the supply of homes. The Council recognises that Government places particular value on the Green Belt. ¶83 of the NPPF notes that "once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan". The Housing White Paper (February 2017) notes that "authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements". Whilst the Council remains of the view that the strategy and the site allocations as submitted to the Secretary of State remain sound it recognises a need to consider the changed circumstances brought about by the release of housing figures for Leeds in the Government consultation on housing need. It is noted that all the sites earmarked for release through the SAP are considered by the Council to be sound and suitable for housing.
- 3.2 As noted in ¶2.3 above the submission SAP categorises two sorts of site allocation to meet the Core Strategy needs of 66,000 homes i.e. identified and allocated sites. The Council now proposes to introduce a third category of site, namely Broad Locations for Growth.
- 3.3 The identification of broad locations is considered to form a reasonable option for progressing the SAP in order to meet identified development requirements whilst also having regard to the future trajectory of housing growth signalled by the CLG housing needs consultation. Sites within Broad Locations will form a pool of sites within the Green Belt. When a revised housing requirement is adopted in the Core Strategy Selective Review (CSSR), the SAP can be immediately reviewed to determine whether the allocations therein provide sufficient land to meet the CSSR targets for the new plan period 2017 to 2033. Any additional land required (for housing allocations and safeguarded land beyond the plan period) can be sourced from the broad locations and only at that time be released from the Green Belt if

needed.

### Broad Locations for Growth

3.4 The NPPF supports this approach and states in ¶47:

*‘To boost significantly the supply of housing, local planning authorities should:*

- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;*
- identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;*
- identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;*
- for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and*
- set out their own approach to housing density to reflect local circumstances.’*

*(my emphasis)*

3.5 The SAP could have identified Broad Locations from the start but given the desire for the Council to take the difficult decisions on amending the Green Belt boundary in a responsible and plan-led manner it was not considered that postponing decisions on Green Belt release was in the best interests of local communities at the time. The wider context has now changed and with the likelihood of lower housing numbers (signposted by the Government’s consultation on housing need) a responsible and plan-led approach looks different now to what it did four years ago.

3.6 There is no glossary definition of a broad location of growth in the NPPF. The Council’s recommended approach to categorising broad locations is to identify specific locations with a defined boundary with a range of smaller and larger broad sites/locations. This is considered to be entirely in line with the Planning Practice Guidance (PPG). The PPG refers to sites and broad locations in an interchangeable manner throughout section 3 on “housing and economic land availability assessment”. The PPG specifically notes:

***‘What site/broad location size should be considered for assessment?’***  
*Plan makers will need to assess a range of different site sizes from small-scale sites to opportunities for large-scale developments such as village and town extensions and new settlements where appropriate. The assessment should consider all sites and broad locations capable of delivering 5 or more dwellings*

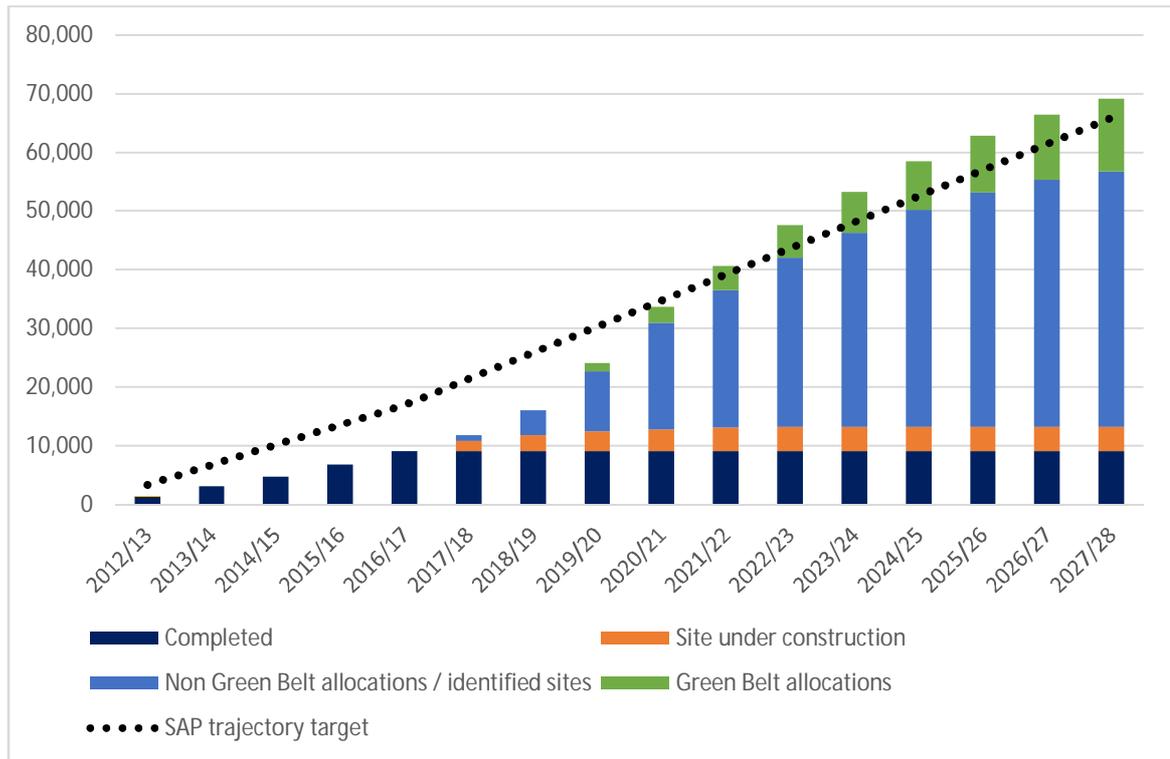
*or economic development on sites of 0.25 hectares (or 500 square metres of floor space) and above. (Section 3 ¶10)'*

- 3.7 The PPG also notes that plan makers should assess potential sites and broad locations via detailed site surveys which includes “site size, boundaries, and location” (Section 3 ¶16).

#### The Site Allocations Plan Housing Trajectory

- 3.8 The NPPF requires that specific identified sites are allocated for years 1 to 5 of a plan with broad locations considered appropriate for years 6 to 15. The SAP is a 16 year plan period which began on 1st April 2012 and runs until 31st March 2028 i.e. the Council is currently at year 6 of the plan period. Whilst the NPPF only requires specific allocated sites for years 1 to 5 and allows Broad Locations thereafter, it equally requires a plan to ensure a five year housing land supply. In light of this (and as shown in the agenda item on the Strategic Housing Land Availability Assessment) the City Council needs to identify specific housing allocations on Adoption of the SAP so as to maintain a five year housing land supply. Beyond year 10 i.e. 2023/24 to 2027/28 the council consider that Broad Locations in line with the NPPF can be set out.
- 3.9 The graph below sets out a revised housing trajectory for the SAP and shows how the 69,426 homes can be delivered by the end of the plan period against a trajectory for 66,000 apportioned annually in line with the overall Core Strategy plan-target. The graph shows cumulative performance of a variety of sources as follows:
- Homes delivered or under construction (totalling 13,272 homes)
  - Non-green belt allocations / identified sites (currently totalling 43,769 homes)
  - Green Belt allocations for the SAP (currently totalling 12,385 homes)
- 3.10 The trajectory reflects the status of recent PAS sites allowed on appeal and the release of Green Belt land for housing at Skelton Gate in the Adopted Aire Valley Leeds Area Action Plan. A key thrust of this approach is also to identify those sources of supply that are able to come forward sooner so as to relieve pressure on Green Belt releases. To that end, some sites originally phased in later phases of the plan have been brought forward to Phase 1 to secure a larger pool of suitable non-Green Belt sites.
- 3.11 This trajectory shows that in line with the delivery assumptions in the SHLAA there is anticipated to be sufficient housing land in place to enable the delivery of the required number of homes (some 47,643 homes) by 2022/23. The figure shows how the individual components of housing supply work together to support the SAP trajectory. Not all sources of housing land will perform at the same rate but by 2022/23 there will be an estimated contribution of 5,594 homes on Green Belt land, so as to support the trajectory.
- 3.12 Whilst the total contribution from all of the individual components of land supply is marginally above the trajectory by 5% (i.e. the bar at year 2022/23 is above the dotted trajectory line) this is necessary to ensure that the flexibilities of choice and competition required by ¶47 of the NPPF are in place.

**Figure 1: Housing Trajectory for the Site Allocations Plan (derived from SHLAA Update 2017)**



3.13 Understanding that 5,594 homes on Green Belt land is necessary to meet Core Strategy targets by 2022/23 is helpful to determining the level of Green Belt release necessary to ensure that the SAP is considered by the Inspectors to be sound and in line with national guidance and the Core Strategy. An element of Green Belt release is also considered necessary (see SHLAA Report) to remedy the Council’s current 4.38 year land supply and help demonstrate a 5 year housing land supply on Adoption of the SAP. To that end, the remainder of the proposed Green Belt allocations will be designated as Broad Locations i.e. land for 6,791 homes.

Contribution to the housing trajectory by individual HMCAs

3.14 The Green Belt release in the SAP is spread amongst 9 Housing Market Characteristic Areas (HMCAs) (there is no Green Belt in City Centre and Inner HMCAs) so as to ensure that all parts of Leeds have the opportunities for new homes for local people. The release is supported by the synthesis of a number of technical assessments which support the submission draft of the SAP, including: Green Belt assessment, Sustainability Appraisal, infrastructure assessment, including highways modelling and public transport accessibility and school places. Individual site assessments provide a comprehensive summary of this technical work.

3.15 Green Belt release has been assessed comparatively within each HMCA in line with Policy SP7 of the Core Strategy. In order to ensure that HMCAs continue to provide housing opportunities to meet local needs as set out in the Core Strategy it is proposed that each HMCA make a pro rata contribution towards the 5,594 homes that are needed on Green Belt and thus in total help support the maintenance of the

SAPs housing trajectory. 5,594 homes is 45.2% of the total Green Belt release currently proposed in the SAP. The table below reflects what this equates to per HMCA.

**Table 1: Site Allocations Plan target per HMCA and number of homes needed to remain in each HMCA**

HMCA	Target	Submission SAP Housing Allocations on current UDP Green Belt	45.2% target of Green Belt land to remain as housing allocation	54.8% target of GB to be re-designated as Broad Locations
Aireborough	2,300	972	439	533
City Centre	10,200	0	0	0
East	11,400	245	111	134
Inner	10,000	0	0	0
North	6,000	1365	617	748
Outer North East	5,000	1974	892	1082
Outer North West	2,000	152	69	83
Outer South	2,600	1634	738	895
Outer South East	4,600	2595	1172	1422
Outer South West	7,200	2456	1109	1346
Outer West	4,700	992	448	544
<b>Total</b>	<b>66,000</b>	<b>12,385</b>	<b>5,594</b>	<b>6,787</b>

3.16 As the table 1 above shows, by taking this approach, the City Council is proposing not to release land from the Green Belt for 6,787 homes. This means that over half of the Green Belt land originally earmarked for housing will now remain in the Green Belt as a Broad Location.

Methodology for site selection

3.17 The methodology has entailed taking the resulting HMCA targets for Green Belt land to remain as housing allocations and targets for Broad Locations. The majority of the HMCAs are broadly in line with these targets and this approach (as is the case in the Submission Draft Plan approach to HMCA targets). It should be noted that inevitably due to site capacities, a consistent approach to comparatively assessing sites and other factors it will not always be possible (nor desirable for good planning reasons) to meet the targets exactly.

3.18 The methodology for site selection of broad locations has been to make use of the existing approach and technical work which underpins the SAP, as follows:

- Phasing
  - some Green Belt sites are in Phase 1 for reasons of regeneration priority and the principle that such releases are necessary to stimulate local markets remains
  - some sites are in Phase 1 because they are of such a scale that they would need to start early in order to ensure that they build out by the end of the plan-period. On its own terms this is not considered to be a

compelling argument to retain the release of sites from the Green Belt and other assessments (below) are considered

- phasing of sites in Phase 3 denotes that the sites are less well connected to the main settlements and therefore not sequentially preferable for release
- Green Belt assessment
  - This establishes which sites would be least damaging to the purposes and integrity of the overall Green Belt. It does not score sites on Green Belt merits but enables a comparative assessment of a sites current purposes towards Green Belt and any harm that may arise from a housing allocation.
- Site Assessments
  - These summarise the outcomes of the overall assessment, including the Green Belt Review alongside other relevant technical work such as highways and public transport assessments as well as a sites compliance with the Core Strategy spatial strategy e.g. settlement hierarchy.
- Sustainability Appraisal
  - This establishes the wider sustainability merits and/or disbenefits that may need to be mitigated for individual sites. It scores sites against a selection of 22 social, economic and environmental criteria. It does not score sites overall but enables a comparative assessment of a sites sustainability credentials

3.19 In some instances a consistent application of this approach is not possible and there are some notable exceptions. Some large scale sites, support delivery of infrastructure (e.g. new road improvements or on-site schools) by virtue of either their scale and/or the need to mitigate adverse impacts of development. These have been re-assessed specifically to understand whether, in line with attaining the targets for allocations and Broad Locations set out above, they can be reduced in scale where this is seen as the best planning outcome for an HMCA.

Outcome of the re-assessment of Green Belt releases against the housing trajectory

3.20 The outcomes of these site assessments are summarised in **Appendix 1 (to follow)** alongside the conclusions for each site as to whether it should be remain unchanged as a housing allocation or change designation to a Broad Location.

3.21 The pro-rata apportionments of land by HMCA are summarised in **Appendix 2 (to follow)** alongside any deviations from the approach set out above.

3.22 The outcomes of the re-assessment have been subject to a Sustainability Appraisal. This is detailed at **Appendix 3 (to follow)**.

3.23 The outcomes of the re-assessment also requires a new policy basis and justification for Broad Locations. This is set out at **Appendix 4 (to follow)**.

3.24 Continuous engagement with prescribed bodies under the Duty to Cooperate is underway to consider any wider implications of the proposals set out in this paper.

### Phasing

- 3.25 Given that the SAP is being amended to provide for sufficient Green Belt land to be released to achieve the Plan's trajectory by 2022/23 there will also be a need to make some changes to the phasing of sites in the Submission plan (as set out in ¶3.10 above).
- 3.26 This will ensure that the non-Green Belt housing allocations can all make a contribution to the housing trajectory immediately, thus lowering the quantum of Green Belt land to be released. All specific sites therefore which are to be allocated in the Plan will now be proposed to be Phase 1 sites. Whilst this differs from the approach set out in the Submission Draft Plan this is in effect a necessary and inevitable outcome. The SAP phasing does not place a timed release upon sites, rather it sets out that the 5 year housing land supply provides the mechanism to releasing future phases. By ensuring that sites are all brought forward in Phase 1 now the Council can be in a better position to achieve a 5 year land supply upon adoption of the SAP.
- 3.27 The sites affected by this are listed in **Appendix 5 (to follow)**.

### Safeguarded Land

- 3.28 The Council also needs to have regard to ¶85 of the NPPF and the advice that "where necessary [local authorities should] identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period", the Core Strategy sets out a need for 10% of the housing requirement to be established as safeguarded land (i.e. 6,600 in the Submission Draft Plan). The Submission Draft Plan designated such land as follows:
- the designation of some existing UDP Protected Areas of Search as Safeguarded Land for long term development needs (including for housing and employment) where these were considered to be less sustainable compared to Green Belt releases (equivalent of circa 4,000 homes)
  - the designation of new Safeguarded Land from the Green Belt (equivalent to 2,500 homes)
- 3.29 Consistent with ensuring that Green Belt boundaries will be examined in a future Review of the SAP it is considered that there is no longer a need for the specific designation of Safeguarded Land from the current UDP Green Belt at this time. Instead, it is proposed that the identification of broad locations in the Green Belt include additional potential for future safeguarded land releases beyond the plan period should these be required following Adopted of the CSSR.
- 3.30 To that end, the amount of land to be designated as Broad Locations will include land for 6,787 homes, previously allocated for housing and land for 2,500 homes (or employment) previously designated for safeguarded land as set out at **Appendix 6 (to follow)**.

### Next Steps

- 3.31 Development Plans Panel are asked to endorse the report and its appendices as

forming the material for the basis for wider consultation with the public before submission to the SAP Inspectors and subject to the approval of the Council's Executive Board and Council. This will be in line with the indicative timetable set out below, subject to consultation with the Inspectorate.

<b>Milestone</b>	<b>Date</b>	<b>Notes</b>
Executive Board	13 <sup>th</sup> December 2017	<ul style="list-style-type: none"> <li>• Recommend changes for consultation to Council</li> </ul>
Full Council	10 <sup>th</sup> January 2018	<ul style="list-style-type: none"> <li>• Approve changes for submission subject to public consultation and necessary amendments</li> </ul>
Public Consultation	22 <sup>nd</sup> January to 2 <sup>nd</sup> March 2017	<ul style="list-style-type: none"> <li>• Public Consultation</li> </ul>
Submission of revised draft to SAP Inspector	March 2017	<ul style="list-style-type: none"> <li>• Responses will be sent in full and in summary format</li> </ul>
Inspectors preparation for Stage 2 hearing sessions	April to June 2018	<ul style="list-style-type: none"> <li>• Revised Matters and Issues</li> <li>• Revised Guidance Note</li> <li>• Revised Agenda</li> </ul>
Hearing Sessions Stage 2	July 2018	<ul style="list-style-type: none"> <li>• In line with Inspector's and Programme Officers availability</li> </ul>

3.32 The approach outlined above will generate a need to reconsider the background material that the Council has relied on for its Submission SAP. A standalone background paper will be produced to support the consultation and be made available.

## **4 Corporate Considerations**

### **4.1 Consultation and Engagement**

4.1.1 The focus of this report has been to update Members of the proposed changes for the Site Allocations Plan (SAP) to respond to the recent DCLG Consultation and potential downward trajectory of housing need. It is intended that following further technical work a revised submission draft plan will be prepared and subsequently consulted upon in early 2018 (see timetable paragraph 3.11).

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

4.2.1 In the preparation of the Site Allocations Plan, due regard has been given to Equality, Diversity, Cohesion and Integration issues. This has included the completion of EDCI Screening of the SAP and meeting the requirements of the Strategic Environmental Assessment Directive, which has meant that the Plan is subject to the preparation of a Sustainability Appraisal. The purpose of such Appraisal 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 material follows on and

reflects the approach set out in the Core Strategy, which has also had the same regard to these issues.

### **4.3 Council policies and Best Council Plan**

4.3.1 The Core Strategy and SAP play a key strategic role in taking forward the spatial and land use elements of the Vision for Leeds and the aspiration to be the ‘the Best City in the UK’. Related to this overarching approach and in addressing a range of social, environmental and economic objectives, these Plans seek to implement key City Council priorities. These include the Best Council Plan (in particular priorities relating to ‘Supporting economic growth and access to economic opportunities’, ‘Providing enough homes of a high standard in all sectors’, ‘Promoting physical activity’ and ‘Enhancing the quality of our public realm and green spaces’ and Breakthrough Projects including ‘Housing growth and high standards in all sectors’ and ‘More jobs, better jobs’).

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

4.4.1 The proposals set out in this report incur further costs associated with a further round of public consultation. This is considered to represent better value for money than withdrawing the plan or progress it in its current form, both of which would place the investment made thus far at risk. Given the considerable costs incurred to date progressing the Plan through Examination with modification is considered to be the best outcome in terms of resources and value for money.

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

4.5.1 The report is not eligible for call-in as it is for information only.

### **4.6. Risk Management**

4.6.1 Adoption of the SAP is essential to enable the Council to demonstrate that sufficient land will be available when needed to meet the need for housing in Leeds. Without an up to date plan the ‘presumption in favour of sustainable development’ by the Government means that any Local Plan or Neighbourhood Plan will have less weight and that speculative development may be acceptable, regardless of any previous positions of the authority. The further the Plan progresses, the more material weight can be given to it. The proposals outlined in this report ensure that, whilst the Plan will now incur limited delay, when set against the alternatives there are far fewer risks.

## **5 Conclusions**

5.1 This report has set out the details of the approach used to reflect on and have regard to the Government’s latest consultation on housing needs and the concerns it raises as to the release of Green Belt land for housing in Leeds. The report details the proportionate split which is envisaged to be required in each HMCA alongside a method for comparatively assessing which sites should remain in the Green Belt and which should be designated as Broad Locations.

5.2 By taking this approach, the City Council is proposing not to release land from the Green Belt for 6,787 homes. This means that over half of the Green Belt land

originally earmarked for housing will now remain in the Green Belt as a Broad Location.

- 5.3 The report results in the following changes to the Submission Draft of the SAP which will be subject to wider public consultation before being submitted to the Secretary of State and SAP Inspectors prior to Stage 2 of the hearing sessions.
- Changes to the phasing of housing allocations from Phases 2 and 3 to Phase 1 so as to ensure that there is sufficient deliverable land to meet the SAP housing trajectory by 2022/23
  - Redesignation of sites from “housing allocations to be released from the Green Belt” to “Broad Locations remaining in the Green Belt”
  - Redesignation of safeguarded land from “safeguarded land to be released from the Green Belt” to “Broad Locations remaining in the Green Belt”
- 5.4 Sites within Broad Locations will form a pool of sites within the Green Belt. When a revised housing requirement is adopted in the Core Strategy Selective Review (CSSR), the SAP can be immediately reviewed to determine whether the allocations therein provide sufficient land to meet the CSSR targets for the new plan period 2017 to 2033. Any additional land required (for housing allocations and safeguarded land beyond the plan period) can be sourced from the broad locations and only at that time be released from the Green Belt if needed.

## **6 Recommendations**

- 6.1 Development Plan Panel is invited to:
- i. Note the update on further technical work on housing and Green Belt and revised timetable for the hearing sessions of the SAP Examination
  - ii. Consider the revised approach to Green Belt sites in the Submitted SAP and the consequent continued allocation of a selection of those sites, alongside the designation of Broad Locations for the remainder
  - iii. Recommend to Executive Board that the Submission Draft SAP be amended to reflect this revised approach and be subject to public consultation prior to submission to the Secretary of State

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Report author: Matthew Brook/  
Kathryn Holloway (87650/87645)

**Report of the Chief Planning Officer**

**Report to Development Plan Panel**

**Date: 21 November 2017**

**Subject: Strategic Housing Land Availability Assessment Update 2017**

Are specific electoral Wards affected? If relevant, name(s) of Ward(s): All	<input type="checkbox"/> Yes	<input checked="" 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. This 2017 update of the Strategic Housing Land Availability Assessment (SHLAA) has used the Council's established methodology in accordance with national planning policy and up-to-date interpretation of planning guidance.
2. The assessment concludes that an improving stock of deliverable land supply exists in Leeds within the context of the strengthening market, recent planning permission activity and ongoing housing growth initiatives.
3. The Council anticipates that it will be able to demonstrate a five year housing land supply upon the adoption of the Site Allocations Plan, if not sooner pending changes to the National Planning Policy Framework and consequent implications for the housing land supply requirement for Leeds.

**Recommendation**

5. Development Plan Panel is recommended to note, comment and agree the contents of this report to be published.

## **1. Purpose of this Report**

- 1.1. To update Development Plan Panel on the progress and conclusions of the 2017 SHLAA prior to its publication.

## **2. Background Information**

### Purpose of a SHLAA

- 2.1. Preparation of a SHLAA (with annual updates) is a requirement of the National Planning Policy Framework (NPPF). A SHLAA is a technical study to inform planning policy development and implementation. It is not the purpose of the SHLAA to allocate land for development; this is undertaken through the preparation of a Development Plan. A SHLAA also sets out whether there is a deliverable supply of housing land for five year's worth of housing, known as the five year housing land supply.
- 2.2. The previous Leeds SHLAA - the 2015 SHLAA - worked to a base date of 01/04/2015. This SHLAA Update works to a base date of 1 April 2017.

### Previous SHLAA updates

- 2.3. Following the introduction of national planning guidance, the preparation of a SHLAA for Leeds commenced in 2008 with the setting up of a partnership of external housing interests, agreement of a methodology and assessment of over 700 sites. The exercise completed in 2009 and the final reports were published early 2010. The SHLAA has then been updated on four further occasions (2011, 2012, 2014 and 2015) to adjust the delivery prospects of sites against updated information and to consider new sites. One of the most important aspects of these updates has been to capture the influence of a recovering housing market on the prospects for housing delivery.
- 2.4. In previous years the Council has pulled together a SHLAA Partnership to steer and oversee the technical work on individual sites. The Partnership has comprised officers, members, the Home Builders Federation (HBF), housebuilders, interested parties (including community representatives) and statutory agencies such as the Homes and Communities Agency.

### 2017 SHLAA

- 2.5. The NPPG provides information to help local authorities fulfil their responsibilities under paragraph 47 of the NPPF. As well as establishing a five-year supply position, to support the preparation and examination of Local Plans, the NPPG confirms that the supply position should be updated annually.
- 2.6. In response to this requirement, the Council publishes a SHLAA on an annual basis. The SHLAA is generally published in Winter each year setting out the housing supply position as at 1 April. A 2016 SHLAA was not published as the Council awaited the Secretary of State decisions on land supply from the 2015 SHLAA in December 2016.

- 2.7. A new approach to the SHLAA following consultation with members and the HBF has been taken that takes into account the conclusions of the Inspector and the Secretary of State towards an improved and more detailed 2017 SHLAA that reflects the up-to-date interpretation of NPPG.
- 2.8. Within this context, the Council has finalised the 2017 update to the SHLAA and has contacted agents, landowners and promoters of sites to comment upon the availability and achievability of each site as part of a positive approach to update the SHLAA, according to the most up-to-date information that is available, on a site-by-site basis. The SHLAA Report is contained at **Appendix 1**.
- 2.9. In order to ensure that the 2017 SHLAA is robust and up to date The Council have been in contact with landowners and developers (via the the Private Sector Housing Acceleration Scheme) and through correspondence ( June 2015, July 2016 and September 2016, Appendix 5) - following the receipt of title information from the Land Registry. The Council has also established an on-going dialogue with the developers (via the Housing Growth Board) to keep up-to-date construction programmes for sites with planning permission. This is the across the board approach taken in the 2017 SHLAA in order to obtain detailed site-specific information that informs assessments of deliverability.
- 2.10. The Council approached the HBF in July 2017 asking that members review and provide comments on sites where they are the landowner or developer of the site or the agent acting on their behalf. This has helped to inform the technical update of the information held for sites with views on availability, viability and market activity forming part of the consultation. The draft SHLAA 2017 was also sent to agents, landowners and promoters of sites in seeking comment on the availability and achievability of each site as part of a positive approach to update the SHLAA according to the most up-to-date information available on a site-by-site basis. This is an across the board approach in the 2017 update, in order to obtain detailed site specific information that informs assessments of deliverability as advocated by the Inspector and Secretary of State in the previous appeal decisions.

### Planning Appeals

- 2.11. It was found by the Secretary of State in December 2016, by his decisions to allow conjoined S78 planning appeals made in respect of land at Breary Lane, Bramhope, at Leeds Road, Collingham and at Bradford Road, East Ardsley on 23 December 2016, that the Council did not have a five year housing land supply.
- 2.12. For the Kippax planning inquiry (July 2016) the Council did not present evidence on the assessment of housing land supply on the basis that, by then, it had been recently reported by the Secretary of State through his planning appeal decision in respect of land at Grove Road, Boston Spa (May 2016) and his decisions for Bramhope, Collingham and East Ardsley that the Council did not have a five year housing land supply. As part of the conjoined appeals, the Appellants had argued 2.9 years supply, against the Council's argued 5.4 years supply. The Inspector concluded the true position fell between the two, but was closer to that argued by the appellants – a supply figure of

somewhere between 2.9 and 4.2 years. This was on the basis that the Inspectors conclusion that the developers (appellants) were being more realistic and the City Council too aspirational.

- 2.13. The Council has since continued to increase the stock of outstanding planning permissions with a record year for approvals in 2016/17 of 6,792 new homes whilst progressing the Site Allocations Plan towards adoption alongside a range of housing growth initiatives. These actions strengthen the five year housing land supply.
- 2.14. The Council has properly reflected upon the conclusions of the Secretary of State in December 2016 in deciding the conjoined appeals, has substantially modified its approach to housing land supply calculation, has revisited the evidence base, and has given very thorough consideration to all relevant contextual changes (such as housing market and overall development conditions). There are two current appeals at Rudgate Village, Thorp Arch Trading Estate (September - November 2017) and Tingley Station (PAS) (November 2017).
- 2.15. The Council's calculation of forward housing supply, and what amounts to 'deliverable' supply, is considered to be both realistic and robust in the light of how the assessment of 'deliverability' (properly construed for the purposes of the NPPF) must be approached. 'Deliverability' under the NPPF and NPPG, national policy requires a 'realistic prospect of delivery' be disclosed by a given site. The assessment of supply is to be carried out with regard to what is deliverable, which differs from expected actual delivery.
- 2.16. The Council is of the view that there has been a marked and important step change, by which the Council has considerably improved its housing supply position since that which was in evidence in mid-2016. This is well reflected by a continued increase in the stock of outstanding planning permissions for residential/mixed with residential schemes alongside a range of implemented and progressing housing growth funding and regeneration-led policy initiatives.

#### Planning, Housing and Regeneration Programmes

- 2.17. Housing regeneration and growth is a key priority for Leeds; it is a Breakthrough Project in the Best Council Plan in place to help materialise the efforts needed to meet annual targets set in the Core Strategy.
- 2.18. As part of the positive actions of the Council, the Council has been working with the HCA and DCLG to unlock early, accelerated growth in the city centre housing market. While Leeds has a good track record in working with partners across sectors to stimulate and support the housing market in our existing residential neighbourhoods, through schemes such as; the Housing PFIs; Brownfield Land Programme delivery; private sector housing investment; and Housing Growth Programme (including a large new build council housing programme), there has been more limited intervention to date in stimulating the city centre housing market.

- 2.19. 'Leeds Living' has emerged as a project through this city centre growth ambition and sets out the necessary interventions to enable it. This has developed alongside a separate discussion between DCLG and Core Cities around the need for bespoke housing deals to unlock growth and Leeds Living has effectively become the route for discussion around a Leeds deal. It is estimated that with the appropriate support and cross-sector partnership arrangements 14,000 new homes can be delivered by 2028 in and around the city centre, to create a mixed tenure residential market, and thriving city centre neighbourhood, accessible and available to all Leeds residents. This is part the country's largest single Local Authority housing growth ambition, being driven by the immediate and future growth of the Leeds economy, recent infrastructure improvements such as the flood alleviation scheme to open up the southern side of the city centre for development, significant infrastructure investment in the form of HS2/HS3, and the overall objectives for the Northern Powerhouse.
- 2.20. In line with the NPPF, the Council have consistently made a clear priority to maximise the use of brownfield land in meeting the need for new homes across the district and we are actively engaged with incentivising the bringing back into use of brownfield sites. This approach is no different now, with the Core Strategy spatial strategy focussing on previously developed land and the Settlement Hierarchy (City Centre, Main Urban Area, Major and Smaller Settlements). This strategy gains support from the recent Housing White Paper and recognises that a range of tools and solutions are necessary to stimulate delivery on brownfield sites. A range of local activities are seeking to boost delivery on brownfield sites:
- the Council's Housing Growth Team works across a range of Council services including: Planning, Regeneration, Asset Management and Housing to identify and implement interventions to stimulate housing growth primarily in areas in need of regeneration and on brownfield land.
  - a Housing Investment Land Strategy (HILS) includes a proactive 'live' view of surplus brownfield land in the Council's ownership that has potential for residential development and brings together all proposals for market-led or public sector funded housing on these into a co-ordinated approach to how, when and where housing can be delivered. In April 2017, 917 homes in Seacroft, Halton Moor and Osmondthorpe were granted permission across a range of sites assembled by the Council under the Brownfield Land Programme. They will be delivered by Keepmoat and Strata builders.
  - Publishing a Brownfield Land Register.
- 2.21. The Council were invited by DCLG in January 2016 to be a pilot authority for the Brownfield Land Register project. As part of the project, the Council put together a pilot register of over 300 suitable sites with a total capacity of over 30,000 new homes which will all have planning permission through the Permission in Principle mechanism under the provisions to publish a register by 31 December 2017.

- 2.22. The Council has a primary role in setting out a vision for the development of the District and by identifying sites through the development plan are actively creating new housing opportunities for a range of providers.
- 2.23. Through the Private Sector Acceleration Programme, the Council is already working with SMEs to address stalled sites, through providing planning advice, work locally with the Homes and Communities Agency (HCA) and de-risk sites where possible to add pace to delivery. Since this programme commenced, development has commenced on 12 sites delivering a total of 1,200 units with a further 14 sites moving through the planning process.
- 2.24. The Council is engaging with other developers, SMEs and regional house builders in addition to building its own homes through Council House building. The programme to deliver 1,000 new council homes is delivering at pace and demonstrates Leeds' ability to deliver new housing at scale. In addition to Housing Revenue Account (HRA) resources of £134m, £16m HCA grant has been secured to match and stretch HRA resource to support increased housing supply.
- 2.25. The Council will be working closely with the development industry and other partners to clarify and encourage high quality growth and share ideas and experience – and actively use our own assets and knowledge to unlock housing opportunities and deliver more homes.

### **3. Main Issues**

- 3.1. The preparation of the 2017 SHLAA reflects the most up to date guidance available, including the NPPG. In particular, the NPPG provides more detailed advice for carrying out a SHLAA, noting that it should:
- Identify sites and broad locations with potential for development;
  - Assess their development potential; and
  - Assess their suitability for development and the likelihood of development coming forward (the availability and achievability).
- 3.2. The approach taken in the 2017 SHLAA update provides an up-to-date and more accurate picture of deliverability which takes into account the view from the Secretary of State decisions on the Inspector's conclusions in respect of housing land supply in December 2016 from the 2015 SHLAA. Assessments have been updated to reflect recent planning and construction activity across the district in accordance with national policy.
- 3.3. The 2017 SHLAA assesses 1,234 sites with a total capacity of 204,490 dwellings. Of these, 550 sites are considered to be suitable, available and achievable contributing a total of 57,610 units to the identified deliverable supply between 1 April 2017 and 31 March 2028.
- 3.4. There is a policy compliant deliverable supply of 26,608 as at 1<sup>st</sup> April 2017 (SHLAA sites are shown in **Appendix 3**). Of the 26,606 dwellings in the Identified Supply, 25,977 (98%) are emerging allocations in the SAP or AVAAP.

- 3.5. In line with paragraph 47 of the NPPF (and as a consequence of the appeal decisions outlined above), a 20% buffer has been applied to the housing requirement for Leeds, to account for under delivery since the start of the Plan period (2012/13). This buffer is applied to the Core Strategy housing requirement and the shortfall since the start of the Plan. The total adjusted five year requirement for the period 1st April 2017 to 31st March 2022 stands at 33,571 dwellings, a requirement of 6,714 dwellings per annum.
- 3.6. With the inclusion of windfall at 500 per annum, the return of empty properties together with the discount of demolitions the **overall five year supply is 4.38 years (29,383 dwellings)**.
- 3.7. The 2017 SHLAA is thorough and robust, developed in conjunction with landowners, developers, the HBF and the SHLAA Partnership. Individual site assessments have been undertaken through the SHLAA process in line with best practice. The SHLAA assessment has been populated on the basis of the best evidence of a realistic prospect of delivery and is consistent with the Council's proactive activities and interventions to deliver much needed homes more quickly.

#### DCLG consultation proposals

- 3.8. The Housing White Paper 'Fixing Our Broken Housing Market' (February 2017) contains a number of proposals to reform and simplify the planning system and advised that further consultation on specific issues would follow. On 14 September DCLG released a consultation on a proposed approach to adopting a standard method for calculating local housing need, (Planning for the right homes in the right places). This consultation also sets out the Government's ambition to publish a revised NPPF in Spring 2018. The expectation is for local planning authorities to adopt the proposed method when assessing housing need and in calculating housing land supply. The City Council's draft response to this consultation has previously considered by the Development Plan Panel on 3<sup>rd</sup> November.
- 3.9. The 'Housing need consultation data table' sets out the housing need for each local planning authority using the DCLG proposed method. It sets a figure for 2,649 for Leeds per annum.
- 3.10. The data informing this new method is based on the most up-to-date information available at the date of the consultation document. The housing need figures published are based on the 2014-based household projections (published July 2016) and 2016 house price-to-earnings ratios (published March 2017). These present latest, up-to-date figures. The household projections are updated every two years.
- 3.11. The consultation also notes that whilst these figures represent the minimum number of homes needed in a local authority, Councils may nonetheless decide to deliver more housing due to economic growth ambitions.
- 3.12. It is considered that the consultation signposts a clear direction of policy travel. For Leeds, this would mean a significant reduction in the requirement of 2,051 per annum: from 4,700 to 2,649.

- 3.13. The White Paper states that, in the absence of an up-to-date local or strategic plan, after 31 March 2018 the new method for calculating local housing need would apply as a baseline for assessing five year housing land supply. For illustrative five year supply purposes the proposed requirement for Leeds will result in a total requirement of 21,265 (4,253 per annum) where this is inclusive of a 20% buffer and backlog from the Core Strategy target. However, such a fundamental lowering of the Leeds requirement would inevitably call into question the reasonableness of both backlog and the application of the 20% buffer.

Element	Calculation	Figure
Base requirement 2017/18 to 2021/22	2,649 * 5	13,245
Backlog against CS target from 2012/13	(18,300 - 13,824)	4,476
Base requirement + under delivery	(23,500 + 4,476)	17,721
20% buffer	(17,721 * .20)	3,544
<b>Total requirement</b>		<b>21,265</b>
<b>Annual requirement</b>	(21,265 / 5)	<b>4,253</b>

- 3.14. The 2017 SHLAA illustrates a five year supply of 26,608 from identified sites, with 29,383 overall (from additional windfall). This equates to 4.38 years from the existing requirement. The 5 year supply report is contained at **Appendix 2**. This would increase to 6.91 years when using the DCLG consultation figure as the base annual requirement, even where factors such as backlog and 20% buffer remain are not revisited but remain constant. However, as set out in a separate report on the Development Plan Panel agenda, there are a series of consideration and options before the City Council in determining a revised housing requirement for Leeds as part of the Core Strategy Selective Review (CSSR).

#### 4. Consultation and Engagement

- 4.1. Evidence reports such as the SHLAA are not subject to the need for public consultation. Evidence reports are informed largely by factual investigation and may have limited involvement of particular specialist interests. In the case of the SHLAA, it has been prepared by officers from across City Development as a draft for consultation with partnership members including the house builders. The Council's website contains advice for anybody wishing to submit a site for inclusion in a SHLAA update although these have mainly been via the Site Allocations Plans process, which has been subject of extensive consultation and engagement.

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

- 5.1. It is considered that the publication of the SHLAA Update raises no issues about equality.

#### 6. Council Policies and City Priorities

- 6.1. Keeping the SHLAA up-to-date helps implement the Development Plan i.e. the Core Strategy, AVLAAP and emerging SAP. The Development Plan plays 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, these Plans seek to implement key City Council priorities. These include the Best Council Plan in particular to 'promote sustainable and inclusive economic growth'. The SHLAA also supports the delivery of breakthrough projects on the delivery of housing.

## **7. Resources and value for money**

- 7.1. The in-house technical exercise of preparing the SHLAA Update 2017 has been achieved within the City Council's budget for the Local Development Framework.

## **8. Legal Implications, Access to Information and Call In**

- 8.1. Preparation and upkeep of a SHLAA is a requirement of national government planning policy and informs consideration of planning applications. The report is not eligible for call in as no decision is being taken.

## **9. Risk Management**

- 9.1. The evidence of the SHLAA has in the past been subject to challenge from the development industry, seeking to overturn decisions to refuse planning permission for housing development at appeal, and objecting to development plan policies and proposals concerning the quantity and distribution of housing in Leeds. These issues will be played out in particular at the Examination into the Site Allocations Plan.

## **10. Conclusion**

- 10.1. The report sets out how the 2017 SHLAA has been undertaken and provides overall results. The Council can demonstrate a 4.38 year land supply.

## **11. Recommendation**

- 11.1. Development Plan Panel is recommended to note, comment and agree the contents of this report to be published.

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## **Strategic Housing Land Availability Assessment**

**2017 Update**

**Main Report**

## **1. Background**

- 1.1. The preparation of a Strategic Housing Land Availability Assessment (SHLAA) is a requirement of the National Planning Policy Framework (NPPF). Guidance on preparing SHLAA documents is contained in the NPPF and the National Planning Policy Guidance (NPPG). This SHLAA Update accords with both the NPPF and the NPPG.
- 1.2. The SHLAA is an ongoing technical process to inform planning policy development and implementation. It assists in the monitoring of whether there is an adequate supply of deliverable housing land at any point in time.
- 1.3. The previous Leeds SHLAA worked to a base date of 1 April 2015. This SHLAA Update works to a base date of 1 April 2017. The NPPG provides information to help local authorities fulfil their responsibilities under paragraph 47 of the NPPF. As well as establishing a five-year supply position to support the preparation and examination of Local Plans, the NPPG confirms that the supply position should be updated annually.
- 1.4. Preparation of a SHLAA for Leeds commenced in 2008 with the setting up of a partnership of external housing interests, agreement of a methodology and assessment of over 700 sites. The exercise completed in 2009 and the final reports were published early 2010. The SHLAA has then been updated on four further occasions to adjust the delivery prospects of sites against updated information and to consider new sites. The SHLAA Update 2011 was published in December 2011, the 2012 Update in April 2013, the 2014 Update in July 2014 and the 2015 Update in January 2016.
- 1.5. The 2016 SHLAA was not published as the Council awaited the Secretary of State decisions on land supply from the 2015 SHLAA in December 2016. A new approach following consultation with the Home Builders Federation (HBF) has been taken that takes into account the conclusions of the Inspector and the Secretary of State towards an enhanced and more detailed 2017 SHLAA that reflects the up-to-date interpretation of NPPG assessment of deliverability.

## **2. The SHLAA Partnership and stakeholder engagement**

- 2.1. National practice guidance advocates that local planning authorities work together with key stakeholders, in particular house builders and local property agents; so that they can help shape the approach to be taken to help inform the deliverability and developability of sites, and how market conditions may affect economic viability. In line with the guidance the Council has established a SHLAA Partnership.
- 2.2. In previous years the Council has assembled a SHLAA Partnership to steer and oversee the technical work on individual sites. The partnership comprises officers, members, the HBF, housebuilders, interested parties and statutory agencies such as the HCA.

- 2.3. As part of the approach to the 2017 Update the Council have contacted agents, landowners and promoters of sites to comment upon the availability and achievability of each site as part of a positive approach to update the SHLAA according to the most up-to-date information available on a site-by-site basis.
- 2.4. The Council has been in discussions with landowners and developers through the Private Sector Housing Acceleration Scheme and 2017 SHLAA Update by establishing contact through letters sent in June 2015, July 2016 and September 2016 following the purchase of title information from the Land Registry. The Council is in on-going dialogue with developers to keep up-to-date construction programmes for sites with planning permission. This is the across the board approach taken in the 2017 SHLAA in order to obtain detailed site-specific information that informs assessments of deliverability as advocated by the Inspector and Secretary of State in the previous decisions.
- 2.5. The Council consulted the HBF in July 2017 asking that their members review and provide comments on sites where they are the landowner or developer of the site or the agent acting on their behalf. This informed the technical update of the information held for sites with views on viability and market activity forming part of the consultation.

### **3. Preparing the 2017 SHLAA**

- 3.1. The preparation of the 2017 SHLAA reflects the most up to date guidance available, including the NPPG. In particular, the NPPG provides more detailed advice for carrying out a SHLAA, noting that it should:
- identify sites and broad locations with potential for development;
  - assess their development potential; and
  - assess their suitability for development and the likelihood of development coming forward (the availability and achievability).
- 3.2. The approach taken in the 2017 SHLAA provides an up-to-date and more accurate picture of deliverability which takes into account the view from the Secretary of State decisions on the Inspector's conclusions in respect of housing land supply in December 2016 from the 2015 Update of the SHLAA. Site assessments have been updated to reflect recent planning and construction activity across the district in accordance with national policy.
- 3.3. The sites included in the supply satisfy the requirements of paragraph 47 of the NPPF. The NPPG offers further guidance in paragraph 31. It includes a presumption in favour of including sites allocated for housing and with planning permission, "unless there is clear evidence that schemes will not be implemented".
- 3.4. The NPPG advises: "sites in existing development plans or with planning permission will generally be considered suitable for development". The Council adopts this approach in the SHLAA. The NPPG also states: "it may be necessary to assess

whether circumstances have changed which would alter their suitability”. This has been done by reference to the Site Allocations Plan process and consultation responses, alongside the latest development details of sites e.g. where sites which previously had planning permission for housing may have now been developed or proposed for other land uses. Such sites are removed from the SHLAA by making them dormant.

- 3.5. Where sites have an expired planning permission or no planning history, the SHLAA process has confirmed that sites remain undeveloped and available and the Council has written to landowners to confirm availability, timeframe for delivery and determined there are no identified impediments to the site being delivered. Many of these sites form the Council's Private Sector Housing Acceleration Scheme and officers are in dialogue with landowners and developers to bring forward developments in the short term. Sites that have a planning application pending are discussed with case offices and updated accordingly and the Council is also aware of pre-application enquiries where a view to an application being submitted to the Council for the delivery of housing is being sought. The Council agrees lead-in times and build out rates through the SHLAA Partnership where it is possible for sites currently without planning permission to obtain outline and/or detailed consent and see the start of completions in between 25 to 28 months. On that basis, sites without planning permission where the Council has contacted a willing landowner to confirm pre-application activity contribute to the deliverable supply in Years 3, 4 & 5 in accordance with NPPF paragraph 47.
- 3.6. Where sites are in current or former alternative use, the Council has taken an informed approach and considered delivery likely to be achieved. The Council has contacted landowners to confirm availability and determine details of any existing tenancy agreements in order to assess deliverability upon the landowner obtaining vacant possession of the site together with lead-in times for planning application(s), commencement on sites and the delivery of completions. The short term supply (Years 1 to 5) does not include sites in alternative use with no planning permission as they are not assessed as “available now” for the purposes of NPPF paragraph 47.

#### **4. The Leeds Development Framework**

##### The Core Strategy

- 4.1. The Council Adopted its Core Strategy in November 2014 and this set the framework for housing growth in the District alongside a spatial strategy for development, which sets out where sites will come forward and when. Core Strategy Policy SP6 sets out that the housing requirement will be 70,000 (net) new dwellings between 2012 and 2028 with a target that at least 3,660 per year should be delivered from 2012/13 to the end of 2016/17 with 4,700 per year between 2017/18 and 2027/28. Policy SP7 sets the strategic framework for the distribution of housing.

## The Site Allocations Plan and Aire Valley Leeds Area Action Plan

- 4.2. The Council is well advanced in its preparation of a Site Allocations Plan (SAP) document with hearing sessions commencing in October 2017. The Aire Valley Leeds Area Action (AVLAAP) Plan has been recommended by the Council's Executive Board for Adoption by Full Council in November 2017. Together these Plans set out where allocations for housing will be up to 2028.
- 4.3. The SHLAA does not allocate land, but it has been the key source of sites for the SAP and AVLAAP. The SAP and AVLAAP plan making process has carried out assessments of SHLAA sites along with new sites which were not part of the SHLAA (sustainability appraisal, flood risk appraisal, tests against Core Strategy (CS) policies, infrastructure assessments and highways assessments).

## **5. Planning, Housing and Regeneration Programmes**

- 5.1. Housing regeneration and growth is a key priority for Leeds; it is a Breakthrough Project in the Best Council Plan in place to help materialise the efforts needed to meet annual targets of 3,660 homes per annum between 2012/13 and 2017/18 (stepping up to 4,700 homes per annum thereafter to 2028) have been set in the Adopted Core Strategy.
- 5.2. As part of the positive actions of the Council, over the past six months Leeds City Council has been working with the Homes and Communities Agency and Department for Communities and Local Government to unlock early, accelerated growth in the city centre housing market. While Leeds has a good track record in working with partners across sectors to stimulate and support the housing market in our existing residential neighbourhoods, through schemes such as; the Housing PFIs; Brownfield Land Programme delivery; private sector housing investment; and Housing Growth Programme (including a large new build council housing programme), there has been more limited intervention to date in stimulating the city centre housing market, which has taken longer to bounce back from the recession.
- 5.3. Leeds Living has emerged as the project through this city centre growth ambition and the necessary interventions to enable it can be realised. This has developed alongside a separate discussion between DCLG and Core Cities around the need for bespoke housing deals to unlock growth and Leeds Living has effectively become the route for discussion around a Leeds deal.
- 5.4. It is estimated that with the right support and cross-sector partnership arrangements 14,000 new homes can be delivered by 2028 in and around the city centre, to create a mixed tenure residential market, and thriving city centre neighbourhood, accessible and available to all Leeds residents. This is part the country's largest single Local Authority housing growth ambition, being driven by the immediate and future growth of the Leeds economy, recent infrastructure improvements such as the flood alleviation scheme to open up the southern side of the city centre for development, significant infrastructure investment in the form of HS2/HS3, and the overall objectives for the Northern Powerhouse.

5.5. As with other Core Cities, the Council is in active dialogue with DCLG and HCA towards establishing a Housing Deal for the city that could unlock financial assistance and offer policy flexibilities/freedoms to enable accelerated and additional housing delivery. The main areas of focus are:

- (a) **Funding and Finance** – our Leeds Living proposition identifies the opportunity to accelerate delivery of c15,000 new homes across the central part of the city, through a range of infrastructure, public realm and direct site interventions. Leeds will submit a Housing Infrastructure Fund bid by the 28<sup>th</sup> September that will encompass this ambition for delivery in the short and medium term.
- (b) **Housing Revenue Account (HRA)** – we are proposing that the cap on borrowing is lifted to enable the Council to expand its existing programme of 1,000 new build council homes. Our modelling illustrates the ability to borrow to fund the delivery of an additional 1,500 new homes.
- (c) **Planning policy** – an offer to DCLG that we work collaboratively and explore the scope for: pilot activity in the use of ‘Permission in Principle’ in relation to the emerging brownfield land register, site allocations and self/custom build; support to the SME house building sector; and how common definitions of viability can be developed to aid the efficiency and transparency of decision making and a move away from ‘planning by appeal’.

5.6. Part of the Leeds Living Deal includes the realisation of the Leeds South Bank - a major regeneration opportunity in the plan AVLAAP area. It is one of Europe’s most exciting sustainable growth locations whose regeneration will transform Leeds City Centre construction and property giant Caddick Group has unveiled ambitious plans for a £300m scheme last month to create a new neighbourhood in central Leeds. The new district named SOYO – (SOuth of YOrk road) plans to be on site from Spring 2018.

5.7. This is potentially a powerful project for Leeds and could fulfil a number of roles:

**Co-ordination** - It offers a rallying point for cross-sector working, a tool to capture and galvanise the full scope of residential development and to bring private sector partners together in a coherent way to support and boost the city in delivering its housing and inclusive growth ambitions, maximising value and efficiencies;

**Branding and promotion** – Leeds Living has the potential to create a strong brand recognised locally and nationally, under which a wide range of the Council’s and private sector housing growth activities can be promoted and communicated, giving more leverage to the city in discussions with government around funding (HRA and infrastructure/development related finance) and in supporting external (national and international) investment pitches (eg Leeds Pitchbook, MIPIM). There is potential to easily and quickly develop branding, marketing collateral and web presence.

**Bidding** – providing a framework and programme for infrastructure funding, development finance and site interventions, supporting a packaged and outcomes-based approach to funding discussions over longer time horizons than one off project bids currently allow.

**Delivery** – there is scope for Leeds Living to evolve into a delivery vehicle in its own right, though this will be subject to proving its worth in its early stages and working with the Leader and Executive Members to ensure political expectations and ambitions are appropriately reflected.

- 5.8. The HS2 Growth Strategy already has a number of key workstreams and themes which are resourced and co-ordinated through the HS2 Growth Strategy Board. These will inform Leeds Living as work picks up pace to support the delivery of the residential market in South Bank. The South Bank Framework already articulates a vision for development and growth in this area, which the emerging Infrastructure Plan will build on. The role of Leeds Living here will in the short term be to offer the necessary support and draw in appropriate resources to catalyse the early schemes in the South Bank that are currently close to the tipping point of investment and development commitment. At the heart of our ambition is the development of a vibrant city centre which offers the growing residential community a welcoming and accessible place to live. Central therefore to Leeds Living is the delivery of a housing market that offers choice and affordability to all. This requires a mix of housing products and tenures which appeal to people across income levels and to people at different stages in their lives – as attractive to families and older people as it is to young working people in the city. Alongside this the associated community infrastructure to support neighbourhoods, such as schools, health provision, and shops is needed. The Council, HCA and Government have a central role to play in allowing the city centre to emerge as a mixed community with a strong daytime as well as evening economy.
- 5.9. While PRS is a growing sector in Leeds, there is also a need to ensure that this is balanced with homes for those who wish to purchase their own property and those who require affordable models of rent and home ownership. The Council sees opportunities to use its powers and resources to bring new housing products to the table and work with Government to unlock opportunities to provide a diverse tenure base. The Council have separately articulated an offer to Government through which we can double our delivery of new homes for rent and shared ownership and our partners – Registered Providers and 3<sup>rd</sup> sector providers – share our vision and recognise the opportunities for investment that could flow from Leeds Living. The Council will commission a new city centre housing market assessment to get under the skin of the sub markets to ensure that the city provides the right mix and responds to the needs of the market.
- 5.11. Following success of the PRS model of delivery in London and Manchester institutional investors are bring forward opportunities in Leeds which can accommodate a significant level of housing growth. It has been emerging for the last few years but is now on ground. Dandarra is a key scheme for this model of delivery with a number of sites in the city centre set to follow.

- 5.12. The Council is in dialogue with the developers to keep and up-to-date construction programme that will be subject to financial considerations/market conditions. The PRS model of delivery looks set to be a game changer for the traditional rental market and is amongst a number of concluding factors contributing to delivery in city centre:
- Leeds Living Deal
  - The Leeds South Bank regeneration opportunity
  - Planning permissions activity in last few years
  - Pre-application activity in 2016 and 2017
  - Emergence of PRS delivery model on-the-ground
  - Sites emerging as allocation in emerging Site Allocations Plan
  - Adoption of the Aire Valley Area Action Plan due 8<sup>th</sup> November 2017
- 5.13. In line with the NPPF, the Council have consistently made a clear priority to maximise the use of brownfield land in meeting the need for new homes across the district and we are actively engaged with incentivising the bringing back into use of brownfield sites. This approach is no different now, with the Core Strategy spatial strategy focussing on previously developed land and the main urban area.
- 5.14. This strategy gains support from the recent Housing White Paper and recognises that a range of tools and solutions are necessary to stimulate delivery on brownfield sites. A range of local activities are seeking to boost delivery on brownfield sites:
- the Council's Housing Growth Team works across a range of Council services including: Planning, Regeneration, Asset Management and Housing to identify and implement interventions to stimulate housing growth primarily in areas in need of regeneration and on brownfield land.
  - a Housing Investment Land Strategy (HILS) includes a proactive 'live' view of surplus brownfield land in the Council's ownership that has potential for residential development and brings together all proposals for market-led or public sector funded housing on these into a co-ordinated approach to how, when and where housing can be delivered.
  - Publishing a Brownfield Land Register
- 5.15. The Council is well positioned to use its land to support regeneration and housing growth. In July 2013 the Council adopted a Housing Investment Land Strategy (HILS) which sets out its proactive approach to the use of all surplus land and buildings for the delivery of new homes. The HILS provides an up to date and 'live' view of all the surplus brownfield land in the Council's ownership that has potential for residential development and brings together all proposals for market-led or public sector funded

housing on these into a co-ordinated approach to how, when and where housing can be delivered. The SHLAA makes specific note of whether sites are within the HILS framework and their inclusion is considered to strengthen their achievability. The HILS works to the following approaches:

- (i) open market disposal of LCC land to willing developers;
- (ii) tailored and packaged approaches to clustered sites;
- (iii) working with Registered Providers of affordable housing to support bids for funding and to commit sites for delivery;
- (iv) directly undertake the construction of new Council homes

- 5.16. The Council were invited by DCLG in January 2016 to be a pilot authority for the Brownfield Land Register project. As part of the project, the Council put together a pilot register of over 300 suitable sites with a total capacity of over 30,000 new homes which will all have planning permission following the provisions to publish a register by 31 December 2017.
- 5.17. PiP is a new instrument that has potential to enable a significant level of housing supply in Leeds through the brownfield land register. PiP will confirm the principle and amount of residential development for relevant sites, thereby providing developers with increased certainty, subject only to the technical details stage.
- 5.18. The Register is presented as an online portal of 'ready to develop brownfield land' that provides a package of site information, planning status and a map (site plan). This is integrated with the background evidence held in the Council's Strategic Housing Land Availability Assessment (SHLAA) database. The sites were identified from the SHLAA in four stages: (i) identifying provisional sites, (ii) assessing site suitability, (iii) compiling a pilot register, (iv) publishing a pilot register. The assessment of sites is consistent with the Site Allocations Plan.
- 5.19. The Council has taken a primary role in setting out a vision for the development of the District and by identifying sites through the development plan are actively creating new housing opportunities for a range of providers. However, there are locations in Leeds where the volume industry have told the City Council they will not build as it no longer meets their business models.
- 5.20. Other players in the housing market are therefore critical to ensure that housing needs are met. The Council recognises Government's support for the SME sector, including the reshaping of the Builders' Finance Fund, which enables support for small sites and recognises that the business model for SMEs is different to that of the volume builders. The Council has fed into a number of inquiries into capacity in the homebuilding industry and are currently exploring ways of supporting SMEs, including Registered Providers.

- 5.21. Through the Private Sector Acceleration Programme, the Council is already working with SMEs to address stalled sites, through providing planning advice, work locally with the Homes and Communities Agency (HCA) and de-risk sites where possible to add pace to delivery. Since this programme commenced, development has commenced on 12 sites delivering a total of 1,200 units with a further 14 sites moving through the planning process.
- 5.22. The Council is engaging with other developers, SMEs and regional house builders in addition to building its own homes through Council House building. The programme to deliver 1,000 new council homes is delivering at pace and demonstrates Leeds' ability to deliver new housing at scale. In addition to Housing Revenue Account (HRA) resources of £134m, £16m HCA grant has been secured to match and stretch HRA resource to support increased housing supply.
- 5.23. The Council will be working closely with the development industry and other partners to clarify and encourage high quality growth and share ideas and experience – and actively use our own assets and knowledge to unlock housing opportunities and deliver more homes.

## **6. The 2017 Update**

### **NPPG Stage I: Identification of sites and broad locations**

- 6.1. The area selected for the Leeds SHLAA is the Leeds Metropolitan District boundary as identified in the Adopted Core Strategy (2014). This is the local planning authority area and has been consistently used as the SHLAA boundary since 2009. There are no sites in the SHLAA which cross administrative boundaries; therefore the SHLAA has not been the subject of detailed Duty to Cooperate discussions. Duty to Cooperate discussions continue to take place in relation to the plan-making process and the CS Inspector accepted that the Duty to Cooperate had been fulfilled for the purposes of the CS.
- 6.2. The City Council has worked with a range of stakeholders in producing its SHLAAs over recent years including volume house builders, small and medium scale house builders, estate agents, landowners, representatives of the HBF, the Homes and Communities Agency and Renew (a local organisation representing housing associations), the Leeds Property Forum, regional planning bodies and the former Government Office.
- 6.3. The guidance states that plan makers will need to assess a range of different site sizes from small-scale sites to opportunities for large-scale developments such as village and town extensions and new settlements where appropriate.
- 6.4. Given its unique nature as a large Metropolitan authority with an extensive Green Belt and several stand-alone settlements of varying sizes, the SHLAA is broad enough to cover the full range of types of site listed in the NPPG. There are sites under construction, sites with a range of planning permissions, allocated sites from the

previous Unitary Development Plan Review, brownfield sites, brownfield sites, surplus land, green field and Green Belt sites.

- 6.5. The Council has actively sought sites for consideration through the SHLAA since 2009 and continues to do. In 2009 a formal “call for sites” exercise was undertaken. At each subsequent SHLAA update further sites have been added. A site submission form and call for sites guidance note is available on the SHLAA page of the Council’s web-site. In reflecting national planning guidance, the web-site states “any person can make a suggestion for a new SHLAA site, not just landowners and their agents - a suggestion can be made at any time of year”.
- 6.6. Sites are also considered where they have been proposed via the plan-making process and where they are subject of the decision taking process from pre-application enquiries through to the grant of full planning permission. Since the 2009 SHLAA assessment the progression of the SAP which has identified new sites via submission to the plan-making process and flows of sites via the decision taking process have been the major source of new supply in Leeds.
- 6.7. More recently, sites have been submitted as part of the Council’s involvement as a lead authority in the pilot project of the Government’s Brownfield Land Register which will be published by 31 December 2017.

#### **NPPG Stage II: Site assessment**

- 6.8. The NPPG requires that the estimation of the development potential of each identified site should be guided by the existing or emerging plan policy, including locally determined policies on density and mix. In Leeds this is concerned with whether sites accord with the policies of the Adopted Core Strategy and the SAP and AVLAAP.
- 6.9. The NPPG states that “assessing the suitability, availability and achievability of sites, including whether the site is economically viable provides the information on which the judgement can be made in the plan-making context as to whether a site can be considered deliverable over the plan period”. As noted earlier these tests can help make an assessment as to whether a site has a realistic prospect of coming forward within the short term (i.e. the next five years), the medium term (years 6 to 10) or the long term beyond this point.
- 6.10. The NPPG states that “plan makers should assess the suitability of the identified use or mix of uses of a particular site including consideration of the types of development that may meet the needs of the community. These may include, but are not limited to: market housing, private rented, affordable housing, people wishing to build their own homes, housing for older people, or for economic development uses”.
- 6.11. The suitability of SHLAA sites for development has been guided by:
  - the Adopted Core Strategy (particularly the spatial development strategy policies SP1 to SP10)

- national policy in the Framework (particularly the need to boost significantly the supply of housing and deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities as well as the need to encourage the effective use of land by re-using land that has been previously developed (brownfield land)
- market and industry requirements as expressed to the Council via the preparation of the Core Strategy and recognition that the housing requirement of Leeds, which sits at the heart of the City-Region, is based on economic-led scenarios of likely growth.

6.12. The Council considers that a site is considered available for development, when, on the best evidence available there is confidence that there are no technical, legal or ownership constraints. The Council rely on the following sources of evidence for this:

- the call for sites – where submitters are specifically asked to identify such availability issues and have provided an intent to develop for housing
- information provided in association with planning applications or pre-application discussions – the SHLAA is continually updated with intelligence from Development Management officers who have detailed knowledge on specific sites
- information from regeneration officers working in specific parts of Leeds as part of area-based regeneration programmes
- information on Council-owned land from the Council's asset management section
- information from the Site Allocations Plan consultation processes
- responses to consultation on each update (including from the SHLAA Partnership)

6.13. The issue of achievability has been at the heart of the Leeds SHLAA. The NPPG states that "A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time".

6.14. The NPPG notes that this is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period. The resulting SHLAA analysis must also reflect the requirements of the Framework when considering sites in the short term (the next 5 years). The Framework states, "To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans".

6.15. Paragraph 173 of the NPPF states: *"to ensure viability, the costs of any requirements likely to be applied to the development, such as requirements for affordable housing,*

*standards, infrastructure contributions or other requirements should, when taking into account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable".*

- 6.16. Paragraph 47 of the NPPF provides further information on viability in the context of housing land supply assessments. This clarifies that in order to be considered deliverable, sites should be viable. Developable sites are those which could be viably developed at the point envisaged.
- 6.17. An assessment of viability in Leeds has been tested through two Examinations - the Core Strategy and the CIL Charging Schedule. At both Examinations, the Inspector has determined that there is evidenced viability across all areas of Leeds. Housebuilder representatives on the SHLAA Partnership have confirmed this position. The Council is content there is no contradictory evidence to undermine these conclusions in respect of sites.
- 6.18. The NPPG and the Framework together is that a realistic prospect of development at a particular point in time must be applied for all sites in the 5 year supply (short term). The Framework states that sites with planning permission should be considered deliverable unless there is clear evidence that they will not be implemented. The footnotes of the Framework at paragraph 47 provide more detail on the evidence sought between a short term site (i.e. the next 5 years) which must be considered deliverable and a medium term to longer term site (i.e. 6+ years) which must be considered developable.
- 6.19. The 2017 Update reflects this and sources information about potential deliverability issues on sites with planning permission from Development Management officers and local knowledge gained through the SHLAA partnership and consultation with HBF members.
- 6.20. The Council uses the information it has on suitability, availability, achievability and constraints to assess the timescale within which each site is capable of development. The methodology for the SHLAA is set out at Appendix 1 and makes the following general criteria about when development can start on suitable, available and achievable sites. This may include indicative lead-in times for the development of different scales of sites and where more up to date intelligence is available the general criteria are not used.
- 6.21. The NPPG requires that the SHLAA provides "a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when". The evidence based build out rates in the SHLAA are therefore in line with the NPPF to demonstrate "a realistic prospect that housing will be delivered on the site".

### **NPPF Stage III: Windfall assessment**

- 6.22. The adopted Core Strategy sets a windfall allowance of 500 units per annum. This is a conservative allowance based on historic delivery of small sites below the SHLAA site size thresholds.

### **NPPF Stage IV: Assessment review**

- 6.23. The SHLAA Partnership went through a detailed process of looking at individual sites and seeking to agree suitability, availability, achievability, start dates and build out rates. The broad methodology is included as Appendix 1 to this report.

- 6.24. The SHLAA has been aligned with the SAP and AVLAAP as follows:

- i. Changes to capacities as a result of more detailed assessment and requirements
- ii. Amendments to site boundaries according with submissions to the SAP and AVLAAP and to align with sites which have been merged together in the SAP and AVLAAP<sup>1</sup>
- iii. Amendments to availability and achievability on the basis of site submissions
- iv. Amendments to delivery for those sites not allocated for housing, to beyond the plan period, so that they remain in the SHLAA to be considered at a future review of the plan
- v. Amendments to delivery for those sites proposed to be allocated as Safeguarded Land so that they sit in year 2028 onwards i.e. the year following the end of the plan period, should they be needed.
- vi. New sites received through the SAP and AVLAAP consultation process.

- 6.25. New sites have been assessed from two key sources:

- i. Sites which have received planning permission but were not in previous versions of the SHLAA, and
- ii. Sites which have been submitted as part of the SAP and AVLAAP but were not in previous versions of the SHLAA

### **NPPF Stage V: Final evidence base**

- 6.26. The SHLAA also notes the potential type and quantity of development that could be delivered on each site, including an estimate of build out rates, setting out how any barriers to delivery could be overcome and when.

- 6.27. The Leeds SHLAA is published as a list of all sites or broad locations considered, cross-referenced to their locations on maps, an assessment of each site, in terms of its suitability for development, availability and achievability including whether the

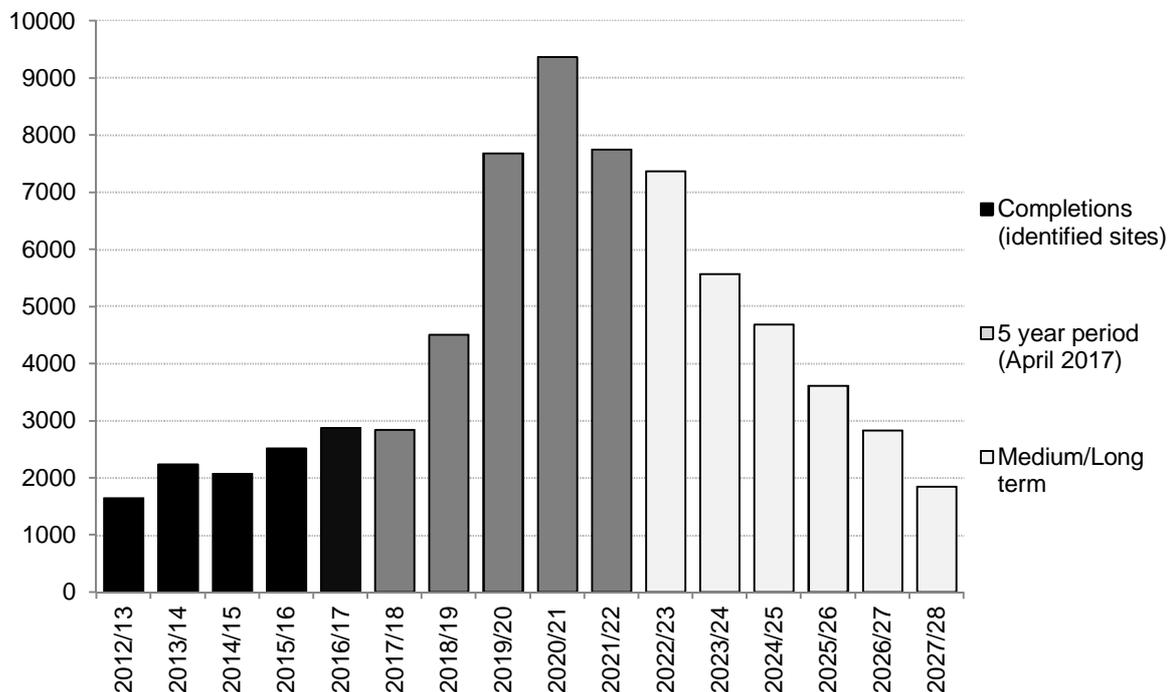
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<sup>1</sup> In some instances SHLAA sites have not been merged to accord with the SAP and AVLAAP e.g. where one parcel of land is advancing at a different rate to the other.

site/broad location is viable, to determine whether a site is realistically expected to be developed and when.

6.28. The trajectory of deliverable supply is based on build rates and pre-build lead-in times which are applied to the assessment of the deliverability of sites. In reality, sites will come forward and deliver in a way which is not possible to forecast with certainty, reflecting market conditions and the capacity of the development industry to deliver housing. The actual rate of delivery of housing will be determined by, amongst other things, the capacity of the market to deliver (e.g. skilled labour, finance and materials) and the demand for new homes in different locations across Leeds. The Council have undertaken the detailed process of looking at individual sites and seeking to determine suitability, availability, achievability, start dates and build out rates. The methodology is included as **Appendix 1** to this report.

6.29. The 2017 Update assesses 1,234 sites with a total capacity of 204,490 dwellings. Of these, 550 sites are considered to be suitable, available and achievable contributing a total of 57,610 units to the identified deliverable supply between 1 April 2017 and 31 March 2028. Figure 1 below shows a rolling trajectory of identified supply from available, suitable and achievable SHLAA sites (i.e. excludes windfall) that will be updated on an annual basis.



## **7. Conclusions**

7.1. This 2017 SHLAA update takes the process forward and highlights the following key points:

- improving market conditions and greater confidence in investment decisions.
- an increase in the number of outlets under construction.
- a boost in supply through recent approvals, housing growth initiatives and the advancement of the AVLAAP and SAP.

## Appendix 1

### Introduction

This report update sets out all the collated information and draft site conclusions reached for all active sites which form part of the Leeds SHLAA. The sites are mapped on an ordinance survey base at a scale to show the context of the location and the site boundaries. Each mapped site has the SHLAA reference number and Site Allocations Publication Draft Plan or Aire Valley Leeds Area Action Plan reference to enable cross reference to the site details of each site record. These are set out – site by site – in order of Housing Market Characteristic Area and then by SHLAA reference numbers.

### **Criteria for inclusion**

This report includes all sites with dwelling delivery potential which are proposed to be allocated for housing or mixed-use development in the Leeds Site Allocation Plan (SAP) and Aire Valley Leeds Area Action Plan (AVLAAP). Where more than one submission has been made on the same land, only one site record is included; duplications are not shown. Sites that have been built out are not included, even though they may have been in previous SHLAAs.

The size threshold for inclusion is 0.4ha except for sites that have planning permission which have a threshold of 0.2ha and sites in the city centre which have no size threshold.

### **Site Details**

The **SHLAA Ref No** is unique to each record. They are not consecutive. The **site address** is a simple description of the location.

The **Brown/Greenfield** field simply records whether a site is previously developed or not; in line with the definition in the Glossary of the Core Strategy. For sites with a mix of “greenfield” and “brownfield”, if one category covered more than 80% of the site, that category was assigned; sites that were more evenly split were assigned to “Mixed”.

**Site Owner.** Site ownership details are recorded from Land Registry title information purchased as part of the 2017 Update.

### **Planning**

All planning applications and permissions are recorded. This means proposals for housing or other land uses within the last 10 years. The existence of applications/permissions for housing gives a signal that the site is suitable and available for housing. Sites with applications and permissions for non-housing uses are made dormant and removed from the deliverable supply.

### LCC Dwellings

#### **Capacity**

This records the remaining capacity of the site in number of dwellings. The capacity is assessed in one of three ways with the first being preferential. First, if available, the latest planning application/permission is used to ascertain capacity. Second, submission

information as part of the SAP / AVLAAP process. Third, a standardised formula is used as set out in the table below Gross site size is converted to a net size depending upon the overall size of the site. This size is then multiplied by a density figure appropriate to the location of the site:

Density Zone	Density Multiplier	Flat Proportion	Net to Gross Density Ratio by Site Size		
			<0.4 ha	0.4 – 2 ha	> 2 Ha
City Centre	350	100	100%	90%	75%
Edge of CC	65	60	N/A		
Urban Area	40	20			
Edge of Urban Area	35	10			
Rural	30	0			

The net site area may have been further reduced if one or more of the following development constraints were considered to apply to the site, for example:

- Steep slopes
- Heavy tree cover
- Awkward shape

Additional reductions to the net site area will have considered whether some or all of the constrained area may be used as amenity greenspace, green corridors etc and thus are already accounted for in the net to gross density calculation above.

### Start date

Commencement dates are updated according to construction programme provided by landowners/developers as part of planning applications and/or discussions with the Council's Housing Growth Team. The methodology for the SHLAA makes the following general assumptions about when development can start on suitable, available and achievable sites:

- With Full PP under construction = Yr 1
- With Full PP unoccupied = Yr 2
- With OT PP = Yr 2
- With OT PP occupied = Yr 3
- Without PP = Yr 3

### Build-out-rates

Build out rates updated according to construction programme provided by landowners/developers as part of planning applications and/or discussions with the Council's Housing Growth Team. With the exception of large sites and blocks of apartments, as a general rule a build-out rate of up to 50 dwellings per annum for each outlet is achievable depending on the size of site.

- Sites <200 units = 1 outlet (i.e. up to 50 dpa)
- Sites 200 to 700 units = 2 outlets (i.e. 100 dpa)
- Sites 700 units plus = 3 outlets (i.e. 150 dpa) or more depending on knowledge from applicant or developer

## **LCC Conclusions**

The text box sets out the key conclusions about suitability, availability and achievability of a site.

### **Suitability**

A reflection of the sites assessment and inclusion as part of the SAP / AVLAAP forward plan-making process.

### **Availability and Achievability**

Availability concerns whether a site is free from legal or ownership problems which could prevent or delay development and how long it would take to overcome the problems.

Achievability concerns mainly whether and when there is likely to be a market for dwellings in the locality taking account of any cost factors to overcoming physical constraints or standard planning requirements. Achievability is an assessment on the likely delivery of dwellings.

Assessments on **availability** and **achievability** drew on the following factors, some of which will have been submitted:

- Construction progress
- Planning status
- Developer involvement
- Alternative proposals
- Site use
- Competing sites
- Site location
- Market area
- Landowner contact

Conclusions are set out as:

- Short term (1 to 5 years).
- Medium term (6 to 10 years).
- Long term (11+ years).

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## **Five Year Housing Land Supply Statement**

### **2017 Update**

## **1. Background**

- 1.1. The National Planning Policy Framework (NPPF) states that local planning authorities must identify a deliverable five year supply of housing sites.
- 1.2. The preparation of a Strategic Housing Land Availability Assessment (SHLAA) is a requirement of the NPPF with guidance provided in the National Planning Practice Guidance (NPPG). The SHLAA is a technical study that assists in the monitoring of whether there is an adequate supply of deliverable housing land at any point in time.
- 1.3. The Council was adjudged by the Secretary of State in his decisions at Breary Lane, Bramhope, Leeds Road, Collingham and Bradford Road, East Ardsley on 23rd December 2016 not to have a five year housing land supply. This was based on the 2015 Update to the SHLAA.
- 1.4. At those conjoined appeals decided in December, which considered supply from 1 April 2016, the Appellants submitted 2.9 years supply against the Council's 5.4 years supply. The Inspector concluded the true position would be between the two but closer to the Appellants - between 2.9 and 4.2 years.
- 1.5. In moving forward, the Council has since continued to increase the stock of outstanding planning permissions whilst progressing the Site Allocations Plan towards adoption alongside a range of housing growth initiatives. These actions have strengthened the five year housing land supply position.
- 1.6. This statement reflects to up-to-date assessment of sites as part of the 2017 Update of the SHLAA.

## **2. National Policy**

### **National Planning Policy Framework**

- 2.1. The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. For housing, this means providing the supply of housing required to meet the needs of present and future generations. Local planning authorities are required to prepare a SHLAA in order to establish realistic assumptions about the availability, suitability and achievability of land to meet the identified need for housing over the plan period.
- 2.2. The NPPF states that local planning authorities must identify a deliverable five year supply of housing sites. Footnote 11 of the NPPF states that to be considered deliverable, sites should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.
- 2.3. The NPPF identifies the need to consider:

- A supply buffer - local planning authorities are required to include an additional allowance or 'buffer' of five percent (moved forward from later in the plan period) in terms of supply to ensure choice and competition in the market for land. Local planning authorities with a record of persistent under delivery of housing should consider applying a 20 percent buffer (Paragraph 47).
- Windfall sites - local planning authorities may make an allowance for windfall sites in their five year supply if they have compelling evidence such sites have consistently become available in the local area and will continue to provide a reliable source of supply (Paragraph 48).

2.4. Paragraph 49 of the NPPF states that relevant policies for the supply of housing should not be considered up to date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites.

### **National Planning Practice Guidance**

2.5. On 6 March 2014 the Department for Communities and Local Government (DCLG) published the planning practice guidance accompanying the NPPF. The PPG provides clarity on what might constitute a 'deliverable' site. This has been used to determine the approach taken in this document.

## **3. The requirement**

3.1. The starting point for establishing a five year supply requirement is the housing target set out in the up to date Local Plan<sup>1</sup>.

3.2. It is agreed the adopted Leeds Core Strategy sets the base requirement for housing provision in the District. Policy SP6 informs of a plan requirement of 70,000 dwellings between 2012 and 2028. For the purposes of monitoring and reporting, the base dates for each year is 1st April.

3.3. Whilst the average net additional housing requirement over the Core Strategy plan period is 4,375 dwellings per annum, Policy SP6 contains a 'step up' in the requirement within the first five years of the plan (1st April 2012 to 31st March 2017) being at the lower rate of at least 3,660 dwellings per annum with subsequent years then being at least 4,700 dwellings per annum thereafter.

3.4. The five-year period that should be used for calculating both the requirement and supply for the purposes of the appeal is the 1st April 2017 to the 31st March 2022. The baseline requirement for this period = 5 x 4,700 = 23,500 dwellings.

3.5. The five-year housing land requirement is calculated by considering the average annual Local Plan requirement and rolling over any previous shortfall since the base

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<sup>1</sup> In accordance with ¶3-030 of NPPG which states "Housing requirement figures in up-to-date adopted Local Plans should be used as the starting point for calculating the five year supply".

date of the Local Plan. Any accrued shortfall is to be made up within five years, which is often referred to as the 'Sedgefield' approach. An appropriate buffer is added and then the annual residual requirement is multiplied by five to generate the five-year housing land requirement.

- 3.6. The delivery and associated undersupply for the first five years of the plan (1st April 2012 to 31st March 2017) are agreed as follows:

**Net Delivery:** 1st April 2012 to 31 March 2017 = 13,824

**Requirement:** 1st April 2012 to 31 March 2017 = 5 years x 3,660 = 18,300

**Undersupply:** 1st April 2012 to 31st March 2017 = 4,476

- 3.7. In line with paragraph 47 of the NPPF, a 20% buffer has been applied to the housing requirement to account for under delivery since the start of the Plan period (2012/13). This buffer is applied to the Core Strategy housing requirement and the shortfall since the start of the Plan.

- 3.8. For the 5 year period 1st April 2017 to 31st March 2022, the calculation is as follows:

**Baseline Requirement:** 2017 to 2022 = 5 x 4,700 = 23,500

**Undersupply:** 2012 to 2017 = 4,476

**Base Requirement + Undersupply** = 27,976

**20% Buffer** = 5,595

**Base Requirement + Undersupply + 20% Buffer** = 33,571

- 3.9. The total adjusted five year requirement for the period 1st April 2017 to 31st March 2022 stands at 33,571 dwellings, a requirement of 6,714 dwellings per annum.

- 3.10. It should be noted that the requirement of 6,714 dwellings per annum relates to the supply of deliverable land only as it includes a significant supply buffer. Accordingly, whilst the proper test is to provide sufficient deliverable land to meet the five-year residual requirement as per the NPPF, it should not be taken that 6,714 dwellings per annum is the delivery requirement for the next five years.

- 3.11. The NPPF does not demand probability or certainty of delivery in fact before a site can be counted as being deliverable, but a 'realistic prospect of delivery'. The assessment of supply is done in terms of what is deliverable, which is different from expected actual delivery.

#### 4. The SHLAA 2017 Update

- 4.1. The National Planning Practice Guidance (NPPG) provides information to help local authorities fulfil their responsibilities under paragraph 47 of the NPPF. As well as establishing a five-year supply position to support the preparation and examination of Local Plans, the NPPG confirms that the supply position should be updated annually.
- 4.2. The preparation of the 2017 SHLAA reflects the most up to date guidance available, including the NPPG. In particular, the NPPG provides more detailed advice for carrying out a SHLAA, noting that it should:
- identify sites and broad locations with potential for development;
  - assess their development potential; and
  - assess their suitability for development and the likelihood of development coming forward (the availability and achievability).
- 4.3. The Council have finalised the 2017 update to the SHLAA and have contacted agents, landowners and promoters of sites to comment upon the availability and achievability of each site as part of a positive approach to update the SHLAA according to the most up-to-date information available on a site-by-site basis.
- 4.4. The sites included in the five-year supply satisfy the requirements of paragraph 47 of the NPPF and in particular, footnote 11. The Council uses the information it has on suitability, availability, achievability and constraints to assess the timescale within which each site is capable of development.
- 4.5. The has contacted landowners as part of considering the availability of sites for allocation under the Aire Valley Area Action Plan, and under the Site Allocation Plan and as part of informing overall 'deliverability', including the "realistic prospect that housing will be delivered within 5 years".
- 4.6. The evidence which underpins the SHLAA satisfies the approach that is advised to be taken under paragraph 47, footnote 11 of the NPPF when considering the deliverability of sites for the five year housing land supply that:
- "To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans".*
- 4.7. The Council confirms that no site included within its supply discloses any legal or ownership constraint, militating against the realistic prospect of delivery or overall deliverability.

4.8. The Council has properly taken into account improving housing market conditions. The housing market in Leeds has recovered and signposts continued and marked improvement. It is considered that comparatively with most recent years, stable economic conditions are prevalent to aid the promotion of housing market performance. The Leeds Crane Survey 2016 observes that national and international developer interest is continuing to grow and that the planning pipeline is strong with numerous high-rise developments proposed. Today, Leeds is firmly in ‘growth mode’ and is committed to additionality, and to accelerating delivery of the City’s housing requirement in line with the Core Strategy (and consistently with very advanced Site Allocations Plan) and its economic growth strategy.

## 5. The Five Year Housing Land Supply

5.1. The SHLAA 2017 Update shows 32,153 units in the short term with 4,988 units on Green Belt sites to be released by the highly advanced Site Allocations Plan and 557 dwellings on safeguarded land sites. Accordingly, the Council discounts 5,545 dwellings from the SHLAA short-term deliverable supply to complete the five year supply picture from identified supply (i.e excluding windfall).

5.2. This leaves a minimum policy compliant deliverable supply of 26,608 (Appendix A with Note on Deliverability) comprised of:

<b>Identified Supply (SHLAA exc. Green Belt, safeguarded &amp; other uses)</b>	<b>26,606</b>
Under construction	3,649
Planning permission	10,954
UDP Allocations	2,714
Expired planning permission	2,475
No planning permission	6,816

5.3. Of the 26,606 dwellings in the Identified Supply, 25,977 (98%) are emerging allocations in the Site Allocations Plan or Aire Valley Area Action Plan. Of the 9,291 dwellings with no or expired planning permission, 7,018 (76%) are on brownfield sites that will be granted Permission in Principle (PiP) through the Brownfield Land Register route in early 2018. PiP is a new instrument which has the strong likelihood of enabling a significant level of housing growth in Leeds. PiP will confirm the principle and amount of residential development for relevant sites, thereby providing developers with increased certainty, subject only to the technical details stage.

5.4. With the inclusion of windfall at 500 per annum (Adopted Core Strategy), the return of empty properties together with the discount of demolitions the overall supply is 4.38 years:

<b>Total Five Year Requirement 1st April 2017 to 31st March 2022</b>	<b>33,571</b>
<b>Annual Requirement</b>	<b>6,714</b>
Identified Supply (SHLAA exc. Green Belt, safeguarded & other use)	26,608
Windfall	2,500
Empty Homes	500
<b>Demolitions</b>	<b>-225</b>
Total Supply	29,383
<b>Five Year Supply</b>	<b>4.38</b>

## 6. Conclusion

- 6.1. The assessment determines that although a **five year housing land supply cannot be demonstrated** the extent of the shortfall is **marginal** following the continued boosting of supply through recent approvals, housing growth initiatives and the advancement of the Site Allocations Plan.
- 6.2. The Council will be able to demonstrate a five year housing land supply within the context of the strengthening market, ongoing housing growth initiatives and upon the adoption of the Site Allocations Plan if not sooner with forthcoming changes housing land supply requirement for Leeds.

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Ref	HMCA	SAP/AVL	Address	Total	17_18	18_19	19_20	20_21	21_22	ST	MT	LT
12	Aireborough	HG2-11	Adjacent To Ivy House Off Larkfield Drive Rawdon Leeds	6	0	6	0	0	0	6	0	0
34	Aireborough	HG1-96	Riverside Mill Low Hall Road Horsforth Leeds LS19	127	50	50	27	0	0	127	0	0
180	Aireborough	HG2-7	Brookfield Nursing Home, Swaine Hill Terrace, Yeadon	7	0	0	0	0	0	0	7	0
738	Aireborough	HG1-2	Cromptons, Netherfield Rd, Guiseley	1	1	0	0	0	0	1	0	0
742	Aireborough	HG1-3	Netherfield Road Guiseley	20	10	10	0	0	0	20	0	0
1113	Aireborough	HG2-6	Land At Silverdale Avenue, Guiseley	32	0	0	0	0	0	0	32	0
1221	Aireborough	HG2-10	Gill Lane, Yeadon LS19	155	0	0	0	0	50	50	105	0
1308	Aireborough	HG1-12	Land To The Rear Of Naylor Jennings Mill Of Green Lane ,	171	40	40	40	40	11	171	0	0
1311	Aireborough	HG2-5	Land To The South Of Coach Road, Guiseley	83	0	0	0	0	0	0	83	0
3026	Aireborough	HG2-1	Land Between Mire Beck And Ings Lane	160	0	0	0	0	55	55	105	0
3029	Aireborough	HG2-2	Land South Of Wills Gill, Guiseley, LS20 9NG	133	0	0	0	0	50	50	83	0
3187	Aireborough	HG1-11	Station Garage Henshaw Lane Yeadon	5	0	0	5	0	0	5	0	0
3366	Aireborough	HG2-9	White House Lane, Yeadon	102	0	0	0	0	102	102	0	0
4019	Aireborough	HG2-8	Kirkland House, Queensway, Yeadon, LS19 7rd	17	0	17	0	0	0	17	0	0
4020	Aireborough	HG2-4	Hollins Lane/hawstone Ave, Guiseley, LS20	80	0	0	0	0	50	50	30	0
4254	Aireborough	HG2-12	Woodlands Drive, Rawdon	25	0	0	0	0	25	25	0	0
5121	Aireborough	HG1-5	Parkside Works Otley Road Guiseley	7	0	0	0	7	0	7	0	0
5287	Aireborough	HG2-229	The Old Mill, Miry Lane, Guiseley	15	0	0	0	15	0	15	0	0
1255B	Aireborough	HG2-3	Shaw Lane (land at), Guiseley and Banksfield Mount, Yeac	234	0	0	0	0	100	100	134	0
182	City Centre	HG1-423	19 Springfield Mount Woodhouse Leeds LS2 9ng	7	0	0	0	7	0	7	0	0
187	City Centre	MX2-20	Westgate - Brotherton House LS1 2RS	63	0	0	0	0	0	0	63	0
202	City Centre	MX1-16	Midland Mills, Silver Street, Leeds, LS11 9yw	15	0	0	0	15	0	15	0	0
205	City Centre	MX1-15	Granary Wharf Car Park, Off Water Lane, Leeds, LS11 5ps	244	0	0	100	144	0	244	0	0
215	City Centre	AV13	79 Clarence Road, Hunslet, Leeds, LS10 1lw	15	0	0	0	0	0	0	15	0
225	City Centre	MX2-32	Westbank, Water Lane, Leeds	288	0	0	0	0	0	0	288	0
228	City Centre	AV9	Evans Halshaw, Hunslet Road, Hunslet, Leeds, LS10 1ld	191	0	0	50	50	50	150	41	0
230	City Centre	MX2-19	Leeds International Swimming Pool Westgate Leeds	209	0	0	100	109	0	209	0	0
395	City Centre	HG1-459	36 The Calls LS1	14	0	0	14	0	0	14	0	0
402	City Centre	MX1-7	Cropper Gate LS1	272	0	0	0	150	122	272	0	0
405	City Centre	MX1-14	Tower Works, Globe Road LS10	160	0	0	50	100	10	160	0	0
406	City Centre	HG1-463	16-18 Manor Road LS11	57	0	0	29	28	0	57	0	0
407	City Centre	HG1-464	Dandarra, Sweet Street/Manor Road	744	0	186	372	186	0	744	0	0



Ref	HMCA	SAP/AVL	Address	Total	17_18	18_19	19_20	20_21	21_22	ST	MT	LT
3017	City Centre	MX1-10	St Peters Church And House, Chantrell House, Leeds Paris	27	20	7	0	0	0	27	0	0
3018	City Centre	HG1-458	4 St Peters Place, Leeds, LS9 8AQ	18	0	0	18	0	0	18	0	0
3157	City Centre	HG2-187	Brandon Road, LS3	72	0	0	0	72	0	72	0	0
3339	City Centre	HG1-434	University Of Leeds 20 - 28 Hyde Terrace, Woodhouse, Le	5	5	0	0	0	0	5	0	0
3340	City Centre	HG1-431	65 Clarendon Road, Woodhouse, Leeds, LS2 9nz	4	4	0	0	0	0	4	0	0
4081	City Centre	AV27	Former Leeds College of Technology, East Street	39	39	0	0	0	0	39	0	0
4190	City Centre	HG1-450	Forsyth House, 5 South Parade, Leeds, LS1 5qx	34	20	14	0	0	0	34	0	0
4195	City Centre	HG1-452	Pennine House, Russell Street, Leeds, LS1 5rn	14	14	0	0	0	0	14	0	0
5015	City Centre	HG1-441	Kendall Carr, Hanover Mount, Woodhouse	23	23	0	0	0	0	23	0	0
5104	City Centre	HG1-438	18 Queen Square, Leeds, LS2	4	4	0	0	0	0	4	0	0
5122	City Centre	HG1-440	17 Regent Street Sheepscar	73	0	0	0	36	37	73	0	0
5123	City Centre	MX1-9	30 Sovereign Street Leeds LS1 4BA	5	0	0	0	5	0	5	0	0
5157	City Centre	HG1-453	6 - 12 Lands Lane, LS1 6LD	18	0	0	18	0	0	18	0	0
5175	City Centre	HG1-462	53 The Calls, Leeds, LS2 7EY	19	19	0	0	0	0	19	0	0
5182	City Centre	HG1-451	22 to 24 New Briggate	12	12	0	0	0	0	12	0	0
5184	City Centre	HG1-454	42 Park Place, LS1 2RY	8	8	0	0	0	0	8	0	0
5195	City Centre	HG1-420	8 Blenheim Terrace, Woodhouse Lane, Woodhouse, Leed	2	2	0	0	0	0	2	0	0
5196	City Centre	MX2-34	Criterion Place North	210	0	0	0	210	0	210	0	0
5199	City Centre	HG1-465	Burley House, 12 Clarendon Road, Woodhouse, Leeds, LS.	25	25	0	0	0	0	25	0	0
5200	City Centre	HG1-466	61-67 St Pauls Street, Leeds, LS1 2TE	3	3	0	0	0	0	3	0	0
5210	City Centre	AV7	Former Yorkshire Chemicals North West, Black Bull St	53	0	0	0	0	0	0	53	0
5212	City Centre	AV14	Hydro Works, Clarence Road	105	0	0	40	65	0	105	0	0
5213	City Centre	AV15	Sayner Lane / Clarence Road	94	0	0	0	0	0	0	50	44
5214	City Centre	AV16	Sayner Lane / Carlisle Road	90	0	0	0	0	50	50	40	0
5224	City Centre	HG1-474	Aspect Court, 47 Park Square East, Leeds, LS1 2NL	29	29	0	0	0	0	29	0	0
5225	City Centre	HG1-475	25 Wellington Street, Leeds, LS1 4DL	20	20	0	0	0	0	20	0	0
5229	City Centre	HG1-479	88 North Street, Sheepscar, Leeds, LS2 7PN	11	11	0	0	0	0	11	0	0
5230	City Centre	HG1-480	143-5 THE HEADROW LS1	15	0	0	15	0	0	15	0	0
5231	City Centre	HG1-481	109 - 113 The Headrow	22	0	0	22	0	0	22	0	0
5232	City Centre	HG1-482	Rivers House, 21 Park Square South	7	7	0	0	0	0	7	0	0
5235	City Centre	HG1-485	117 The Headrow	27	27	0	0	0	0	27	0	0
5244	City Centre	HG1-492	60 Upper Basinghall Street, Leeds, LS1 5HR	5	5	0	0	0	0	5	0	0

Ref	HMCA	SAP/AVL	Address	Total	17_18	18_19	19_20	20_21	21_22	ST	MT	LT
5247	City Centre	HG1-495	54 Albion Street, Leeds, LS1 6AD	8	8	0	0	0	0	8	0	0
5248	City Centre	HG1-496	35 Aire Street, Leeds, LS1 4HT	8	0	8	0	0	0	8	0	0
5272	City Centre	HG2-208	Globe Quay, Globe Road, Holbeck	16	0	16	0	0	0	16	0	0
5281	City Centre	HG2-209	The Faversham, Springfield Mount, LS2 9NG	30	0	0	0	0	0	0	30	0
5348	City Centre	HG1-505	Zicon House, Wade Lane, Leeds, LS2 8NL	79	79	0	0	0	0	79	0	0
5349	City Centre	MX2-35	Temple Works Mixed Use Site	1000	0	0	0	250	250	500	500	0
5353	City Centre	New	Land At David Street, Holbeck	72	0	72	0	0	0	72	0	0
5356	City Centre	New	Unit 1 11 Regent Street, Sheepscar	6	0	6	0	0	0	6	0	0
5357	City Centre	New	Trafalgar House , 29 Park Place	40	40	0	0	0	0	40	0	0
5373	City Centre	New	67 - 83 Cookridge Street, Leeds, LS2 3AW	96	0	96	0	0	0	96	0	0
5374	City Centre	New	49 St Pauls Street	10	0	0	10	0	0	10	0	0
5375	City Centre	New	2 The Embankment , Sovereign Street	41	0	0	41	0	0	41	0	0
5383	City Centre	New	23 Clarendon Road , Woodhouse	16	0	0	16	0	0	16	0	0
5384	City Centre	New	Protection House , 16 - 17 East Parade	7	0	0	7	0	0	7	0	0
5394	City Centre	New	Roberts Wharf, Neptune Street, Leeds, LS9 8DX	14	0	14	0	0	0	14	0	0
00_411	City Centre	MX2-23	Quarry Hill Leeds LS2 / York Street, LS1	600	0	200	200	200	0	600	0	0
2006A	City Centre	HG1-512	Caspar, North Street Leeds	51	51	0	0	0	0	51	0	0
2006B	City Centre	HG2-189	Centenary House, North Street Leeds	85	0	85	0	0	0	85	0	0
2028A	City Centre	HG1-443	Great George Street - LGI	329	0	0	0	0	0	0	329	0
267	East Leeds	HG2-121	Wykebridge Depot, Killingbeck Bridge, LS14	25	0	0	0	25	0	25	0	0
281	East Leeds	HG1-297	Radial Park, Phase One Manston Lane Cross Gates	22	22	0	0	0	0	22	0	0
282	East Leeds	HG1-298	Manston Lane	93	0	0	45	45	3	93	0	0
795	East Leeds	HG1-284	Red Hall Lane LS17	300	0	100	100	100	0	300	0	0
796	East Leeds	HG1-287	Grime's Dyke York Road LS14	8	0	8	0	0	0	8	0	0
797	East Leeds	HG1-288	East Leeds Extension	4446	0	200	300	350	450	1300	2600	546
799	East Leeds	HG1-291	Whinmoor Way (pfi C) LS14	7	7	0	0	0	0	7	0	0
802	East Leeds	HG1-290	Swarcliffe Avenue (pfi E) LS14	7	7	0	0	0	0	7	0	0
1083	East Leeds	AV40	Bridgewater Road North	546	0	0	0	0	0	0	500	46
1297	East Leeds	HG2-120	Former Vickers Tank Factory Site, Manston Lane, Cross Gates	450	0	0	100	100	100	300	150	0
2039	East Leeds	MX1-25	Thorpe Park, Undeveloped Non-submitted Land	300	0	0	0	25	50	75	225	0
2062	East Leeds	HG2-119	Red Hall Offices & Playing Field, LS17	50	0	0	50	0	0	50	0	0
2080	East Leeds	AV38	Copperfields College, Cross Green, LS9	273	0	73	100	100	0	273	0	0

Ref	HMCA	SAP/AVL	Address	Total	17_18	18_19	19_20	20_21	21_22	ST	MT	LT
2086	East Leeds	MX2-38	Barrowby Lane, Manston, LS15	150	0	0	0	0	0	0	150	0
2154	East Leeds	HG1-296	Rear Of Seacroft Hospital	503	0	0	53	150	150	353	150	0
3182	East Leeds	AV112	RocheFord Court, Pepper Lane, Hunslet, Leeds	11	11	0	0	0	0	11	0	0
4191	East Leeds	HG1-300	Land At Brooksbank Drive, Halton, Leeds, LS15	2	2	0	0	0	0	2	0	0
4219	East Leeds	HG1-301	Land Between Century Way And Barrowby Lane, Austhorpe	2	2	0	0	0	0	2	0	0
5217	East Leeds	AV111	Skelton Gate	1801	0	100	150	200	200	650	1000	151
5329	East Leeds	HG2-210	St Gregory's Primary School, Stanks Gardens, Swarcliffe	33	0	0	0	33	0	33	0	0
5389	East Leeds	New	Former Site Of The Whinmoor Pub, Stanks Lane	22	0	0	22	0	0	22	0	0
5393	East Leeds	New	Former Stanks Fire Station, Sherburn Road	5	0	0	5	0	0	5	0	0
2090A	East Leeds	HG2-123	Colton Road East, Colton LS15	14	0	0	0	0	14	14	0	0
2144B	East Leeds	HG2-122	Cartmell Drive, Halton Moor	170	0	0	0	0	50	50	120	0
188	Inner Area	HG1-230	St Marks Flats St Marks Walk Woodhouse Leeds	28	28	0	0	0	0	28	0	0
197	Inner Area	HG1-247	Land At Bridge Street, Gower Street, Regent Street	636	0	200	200	236	0	636	0	0
198	Inner Area	MX1-28	Land at Kirkstall Road and land off Wellington Road	1010	0	0	200	300	300	800	210	0
206	Inner Area	AV32	Adjacent To Rose Wharf, 78 East Street, Leeds, LS10	72	0	0	0	0	50	50	22	0
207	Inner Area	AV33	Lowfold, East Street, Leeds, LS9 8	312	100	100	100	12	0	312	0	0
208	Inner Area	MX1-6	Land Between Mabgate, Macaulay Street, Argyll Road	428	0	0	0	0	0	0	428	0
226	Inner Area	HG2-109	46 Burley Street Burley Leeds LS3 1dh	87	0	0	87	0	0	87	0	0
262	Inner Area	HG2-85	Miles Hill Primary School, Beckhill Approach	50	0	25	25	0	0	50	0	0
263	Inner Area	HG2-86	Hill Top Public House, Beckhill Grove	14	0	14	0	0	0	14	0	0
278	Inner Area	MX2-8	Compton Arms, Compton Road, Burmantofts, Leeds, LS9 7	50	0	0	0	25	25	50	0	0
279	Inner Area	AV24	St Marys Church And Presbytery Church Road Richmond Hill	171	0	0	0	0	57	57	114	0
301	Inner Area	AV22	Upper Accomodation Road, LS9	26	0	0	0	26	0	26	0	0
331	Inner Area	AV98	South Accommodation Road And Atkinson Street Leeds	35	0	0	0	0	0	0	35	0
340	Inner Area	AV48	Former Motor Dealers Premises Church Street Hunslet	23	0	0	0	0	0	0	23	0
383	Inner Area	HG1-207	Beckhill Garth/Approach	34	0	0	0	0	34	34	0	0
414	Inner Area	HG1-246	Skinner Lane LS9	14	14	0	0	0	0	14	0	0
433	Inner Area	MX1-12	Globe Road (Doncasters) LS11	609	0	0	200	200	209	609	0	0
437	Inner Area	AV34	South Accommodation Road LS9 (adjacent to Low Fold)	27	27	0	0	0	0	27	0	0
447	Inner Area	MX1-11	Doncasters Whitehall Road LS12	463	0	0	0	200	263	463	0	0
465	Inner Area	HG1-256	Waterloo Sidings LS9	140	0	0	0	0	20	20	120	0
467	Inner Area	AV41	Hunslet Mill, Goodman Street LS10	699	0	0	0	0	100	100	500	99

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473	Inner Area	HG1-280	West Grange Road(ph 2) LS 10	35	0	0	15	20	0	35	0	0
474	Inner Area	HG1-281	Urn Farm Middleton Road LS10	100	0	0	25	25	25	75	25	0
476	Inner Area	HG1-267	Shaftesbury House Beeston Road LS11	1	1	0	0	0	0	1	0	0
620	Inner Area	HG1-238	214-244 Cardigan Road LS4	65	0	0	32	33	0	65	0	0
814	Inner Area	HG1-508	Oak Tree Mount, Gipton, LS9	62	32	30	0	0	0	62	0	0
815	Inner Area	HG1-227	South Parkway (easel) LS 14	9	9	0	0	0	0	9	0	0
816	Inner Area	HG2-214	South Parkway/york Road Depot LS14	39	0	0	0	39	0	39	0	0
817	Inner Area	HG2-87	Amberton Terrace, Gipton, LS8	57	0	0	0	0	0	0	57	0
841	Inner Area	HG1-224	Oak Tree Drive, Gipton	18	0	18	0	0	0	18	0	0
846	Inner Area	HG1-234	Killingbeck Hospital C LS14	1	1	0	0	0	0	1	0	0
1023	Inner Area	HG2-110	West Of Wesley Road, North Of Tong Road, Armley	33	0	0	33	0	0	33	0	0
1065	Inner Area	AV46	Tetleys Motor Services Ltd, 76 Goodman Street Hunslet L	36	0	0	0	0	0	0	36	0
1144	Inner Area	HG1-242	St Michaels College St Johns Road LS3	459	55	145	259	0	0	459	0	0
1265	Inner Area	MX2-11	Former Gas Works, Armley Gytratory	122	0	0	0	0	0	0	122	0
1338	Inner Area	HG1-251	Mistress Lane Armley	41	0	0	0	0	41	41	0	0
2026	Inner Area	HG1-244	Rspca, Cavendish St	70	0	0	35	35	0	70	0	0
2027	Inner Area	HG2-113	Rear Of Round House	310	0	0	0	75	75	150	160	0
2138	Inner Area	HG1-245	Abbey Street, Kirkstall Road	107	0	0	107	0	0	107	0	0
2142	Inner Area	HG2-106	Kendall Drive, Halton Moor	15	0	0	0	15	0	15	0	0
2143	Inner Area	HG2-107	Neville Road, Halton Moor	83	0	0	0	40	43	83	0	0
2146	Inner Area	HG2-90	Barncroft Close, Seacroft	27	0	0	0	27	0	27	0	0
3015	Inner Area	MX2-13	Benyon House, Ring Road, Middleton, LS10 4AA	37	0	0	0	0	0	0	37	0
3137	Inner Area	HG1-216	Leeds Girls High School, Headingley, LS6 1bn	88	48	40	0	0	0	88	0	0
3142	Inner Area	HG1-271	Malvern Rise, LS11	60	0	0	0	0	0	0	30	30
3143	Inner Area	HG2-114	Cambrian Street, LS11	21	0	0	0	21	0	21	0	0
3145	Inner Area	HG1-275	Bismarck Street, LS11	10	0	0	10	0	0	10	0	0
3146	Inner Area	HG1-261	Holbeck Towers, Holbeck Moor Road	17	0	17	0	0	0	17	0	0
3147	Inner Area	HG1-274	Waverley Garth, LS11	30	0	0	20	10	0	30	0	0
3149	Inner Area	HG1-239	Carlton Gate, LS7	19	0	19	0	0	0	19	0	0
3195	Inner Area	HG1-266	St Luke's Green LS11	17	0	17	0	0	0	17	0	0
3206	Inner Area	HG1-222	Din Buildings, Roundhay Road, LS8 3qd	8	0	0	0	0	8	8	0	0
3345	Inner Area	HG1-232	Servia Road, Leeds, LS7 1nj	72	0	0	36	36	0	72	0	0

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3354	Inner Area	HG1-252	New Wortley Labour Club, Oak Road, New Wortley, Leeds	9	0	0	0	0	0	0	9	0
3408	Inner Area	MX2-10	New Wortley, Wellington Road Industrial Estate, Wellingt	325	0	0	0	0	0	0	325	0
3454	Inner Area	HG2-111	Holdforth Place, New Wortley, LS12 1	48	0	0	0	48	0	48	0	0
3459	Inner Area	AV36	Land Adjacent, St Hildas Church, Knowsthorpe Crescent/c	86	0	0	43	43	0	86	0	0
4027	Inner Area	HG1-510	Winrose Drive/newhall Gate, LS10 3rz	27	27	0	0	0	0	27	0	0
4060	Inner Area	HG2-103	Former Shaftsbury Public House, York Road, Harehills	23	0	0	0	23	0	23	0	0
4063	Inner Area	AV23	Butterfield Manor & Richmond Court, Walter Crescent, Ri	48	20	28	0	0	0	48	0	0
4087	Inner Area	AV117	Land North Of St Hildas Crescent, Cross Green, Leeds. LS9	7	7	0	0	0	0	7	0	0
4110	Inner Area	HG2-93	Seacroft Green Social Club, Seacroft	26	0	0	0	0	0	0	26	0
4117	Inner Area	HG1-509	Moresdale Avenue, Foundry Mill Street, Seacroft	16	16	0	0	0	0	16	0	0
4120	Inner Area	HG2-98	Land At Hawkshead Crescent, Seacroft	25	0	0	0	25	0	25	0	0
4123	Inner Area	HG2-104	Land At A64 And A63 Junction, Killingbeck Bridge, Halton	32	0	0	0	32	0	32	0	0
4125	Inner Area	HG2-116	Winrose Drive Greenspace, Middleton	13	0	13	0	0	0	13	0	0
4185	Inner Area	HG1-212	Boggart Hill Gardens, Seacroft, Leeds, LS14	8	8	0	0	0	0	8	0	0
5014	Inner Area	HG2-100	Gledhow Road/gledhow Terrace	25	0	25	0	0	0	25	0	0
5017	Inner Area	HG2-88	Amberton Hop, Thorn Mount, Gipton	20	0	0	0	20	0	20	0	0
5020	Inner Area	HG2-108	Burley Willows Care Home, Willow Garth, Burley	28	0	0	0	28	0	28	0	0
5109	Inner Area	HG1-220	Browning House, 126 Chapeltown Road, Chapeltown	21	21	0	0	0	0	21	0	0
5124	Inner Area	HG1-278	Pepper Road LS10	12	0	0	12	0	0	12	0	0
5150	Inner Area	HG1-249	Dog and Gun, 601 York Road Leeds	7	0	0	7	0	0	7	0	0
5161	Inner Area	HG1-208	Grove Park Care Home Grove Lane Meanwood	77	0	0	38	39	0	77	0	0
5205	Inner Area	HG1-470	Victoria Road, Headingley, Leeds, LS6	24	24	0	0	0	0	24	0	0
5215	Inner Area	AV28	Bow Street and East Street	23	0	23	0	0	0	23	0	0
5216	Inner Area	AV29	Ellerby Road and Bow Street	79	0	40	39	0	0	79	0	0
5221	Inner Area	MX2-7	Thomas Danby College, Roundhay Road	118	0	0	0	0	0	0	118	0
5222	Inner Area	AV30	Ellerby Lane	147	50	50	47	0	0	147	0	0
5239	Inner Area	HG1-489	Victoria House, Longfield House, Buckingham House, Hea	43	43	0	0	0	0	43	0	0
5245	Inner Area	HG1-493	Oak Villa Hotel, 55 Cardigan Road, Headingley, Leeds LS6	10	10	0	0	0	0	10	0	0
5250	Inner Area	HG1-498	Garnet Grove, Beeston, Leeds, LS11 5JX	25	25	0	0	0	0	25	0	0
5307	Inner Area	HG2-211	Burley Liberal Club, Burley Road/Willow Road	50	0	0	0	50	0	50	0	0
5331	Inner Area	HG2-212	Seacroft Crescent, Seacroft	50	0	0	0	50	0	50	0	0
5332	Inner Area	HG2-213	Bishops Way, LS14	62	0	0	0	50	12	62	0	0

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5333	Inner Area	HG2-214	York road/ South Parkway, Seacroft	30	0	30	0	0	0	30	0	0
5334	Inner Area	HG2-215	The Halton Moor PH, Halton Moor	30	0	30	0	0	0	30	0	0
5338	Inner Area	HG2-216	Ramshead Approach, Seacroft	48	0	48	0	0	0	48	0	0
5342	Inner Area	HG1-499	The Fellmonger, North Parkway, Seacroft, Leeds, LS14 6Q	12	0	12	0	0	0	12	0	0
5347	Inner Area	HG1-504	Site Of Former Spotted Cow, Top Moor Side, Holbeck, Lec	17	17	0	0	0	0	17	0	0
5378	Inner Area	New	Land Adjacent To 11 Hall Road, Armley, Leeds, LS12 1UZ	8	0	0	0	8	0	8	0	0
5385	Inner Area	New	Blenheim Court , Woodhouse	52	0	0	52	0	0	52	0	0
5386	Inner Area	New	Baileys House Adult Residential Centre, Baileys Hill, Seacr	10	0	0	10	0	0	10	0	0
5392	Inner Area	New	Land Off Boggart Hill Road, Seacroft	10	0	10	0	0	0	10	0	0
1145A	Inner Area	MX2-37	Hudson Road, Hudson Mill (Arcadia), Burmantofts	260	0	0	0	0	0	0	260	0
125_210	Inner Area	HG2-99	Hill Top Works & Buslingthorpe Tannery, Buslingthorpe L	189	0	0	0	0	0	0	189	0
1340A	Inner Area	HG1-253	Oak Road, New Wortley - Former Club	6	0	0	6	0	0	6	0	0
1340B	Inner Area	HG2-112	Oak Road, New Wortley - Gassey Fields	113	0	13	50	50	0	113	0	0
2141A	Inner Area	HG1-257	Wykebeck Avenue, Osmondthorpe	55	0	0	0	30	25	55	0	0
2141B	Inner Area	HG2-105	Wykebeck Avenue, Osmondthorpe	52	0	25	27	0	0	52	0	0
2144A	Inner Area	HG1-303	Cartmell Drive, Halton Moor	40	0	0	20	20	0	40	0	0
2147A	Inner Area	HG1-210	Askets and Boggarts (A), Seacroft	22	22	0	0	0	0	22	0	0
2147B	Inner Area	HG2-91	Askets and Boggarts (B), Seacroft	100	0	0	0	50	50	100	0	0
2147C	Inner Area	HG1-211	Askets and Boggarts (C), Seacroft	106	35	35	36	0	0	106	0	0
2147D	Inner Area	HG2-92	Askets and Boggarts (D), Seacroft	100	0	0	0	50	50	100	0	0
2150A	Inner Area	HG2-95	South Parkway and Brooklands, Seacroft	50	0	25	25	0	0	50	0	0
2150B	Inner Area	HG1-226	South Parkway / Brooklands Avenue	160	0	0	50	50	50	150	10	0
2150C	Inner Area	HG2-96	South Parkway and Brooklands, Seacroft	30	0	30	0	0	0	30	0	0
2150D	Inner Area	HG1-225	South Parkway and Brooklands, Seacroft	30	0	0	30	0	0	30	0	0
3390_3393	Inner Area	MX2-9	Kirkstall Road, Leeds	553	0	0	0	0	0	0	553	0
3	North Leeds	HG1-106	3 Monk Bridge Road Meanwood Leeds	9	0	0	0	9	0	9	0	0
8	North Leeds	HG1-88	Spensfield House Otley Road Headingley Leeds LS16 5	13	0	0	0	0	13	13	0	0
37	North Leeds	HG2-47	Land At Vesper Road Kirkstall Leeds LS5 3NU	17	0	0	0	0	0	0	17	0
65	North Leeds	HG1-69	Woodside Mill Low Lane Horsforth Leeds	59	0	0	0	30	29	59	0	0
81	North Leeds	HG2-40	Land Rear High Moor Court, High Moor Avenue, Moor All	9	0	0	9	0	0	9	0	0
97	North Leeds	HG1-518	Meanwood Road Working Mens Club Meanwood Road Le	54	0	0	25	29	0	54	0	0
106	North Leeds	HG1-111	Former Civil Service Sports Association Ground Newton G	74	0	0	74	0	0	74	0	0

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174	North Leeds	HG1-103	University Of Leeds Tetley Hall 40-42 Moor Road	68	10	30	28	0	0	68	0	0
235	North Leeds	HG2-44	Land At Clarence Road Horsforth Leeds LS18 4lb	25	0	0	0	0	0	0	25	0
376	North Leeds	MX1-2	Ring Road West Park, Silk Mill Way And Iveson Drive	335	0	0	0	50	100	150	185	0
626	North Leeds	MX1-3	Kirkstall Forge Abbey Road Kirkstall Leeds Kirkstall Forge,	1385	0	0	150	150	185	485	900	0
685	North Leeds	HG1-60	Eastmoor Tile Lane, Adel, LS16	67	0	0	0	30	37	67	0	0
687	North Leeds	HG1-74	Dunstarn Lane, Adel, LS 16	28	0	0	28	0	0	28	0	0
688	North Leeds	HG1-68	Silk Mill Drive LS 16	20	0	20	0	0	0	20	0	0
689	North Leeds	HG1-70	Cookridge Hospital LS16	243	43	100	100	0	0	243	0	0
720	North Leeds	HG1-66	Westbrook Lane Horsforth	15	0	15	0	0	0	15	0	0
721	North Leeds	HG1-65	Westbrook Lane Horsforth	75	0	0	40	35	0	75	0	0
731	North Leeds	HG1-98	Victoria Avenue Horsforth	5	0	5	0	0	0	5	0	0
764	North Leeds	HG1-89	The Mansion, Woodlea Drive, LS6	17	0	17	0	0	0	17	0	0
845	North Leeds	HG1-108	Mansion House Mansion Gate Drive LS7	18	0	0	18	0	0	18	0	0
1016	North Leeds	HG2-42	Land At Broadway And Calverley Lane, Horsforth	18	0	0	0	0	18	18	0	0
1033	North Leeds	HG1-72	Government Buildings , Otley Road, LS16 5pu	97	50	47	0	0	0	97	0	0
1062	North Leeds	HG2-46	The Former Waste Water Treatment Work, Horsforth	53	0	0	53	0	0	53	0	0
1339	North Leeds	HG1-97	Clarient Production Uk Limited, Calverley Lane, Horsforth	119	50	50	19	0	0	119	0	0
2049	North Leeds	HG2-236	West Park Centre, LS16	69	0	0	0	69	0	69	0	0
2055	North Leeds	HG2-51	Carr Manor, Meanwood, LS6	15	0	0	0	0	0	0	15	0
3014	North Leeds	MX2-4	Area Within Kirkstall Hill, Beecroft Street, Commercial Ro:	55	0	0	0	55	0	55	0	0
3184	North Leeds	HG1-113	The Former Dutton Arms, Queenswood Drive, Headingley	1	1	0	0	0	0	1	0	0
3207	North Leeds	HG1-63	Rear 268-274 Shadwell Lane LS17	3	3	0	0	0	0	3	0	0
3301	North Leeds	HG1-93	128 Wetherby Road, Roundhay, Leeds, LS8 2jz	1	1	0	0	0	0	1	0	0
3341	North Leeds	HG1-91	Rear Of The Hollies, Park Avenue, Roundhay, Leeds, LS8 2	5	5	0	0	0	0	5	0	0
3376	North Leeds	HG2-49	Weetwood Avenue, Leeds, LS16 5NQ	30	0	0	0	0	30	30	0	0
3384	North Leeds	HG2-37	Land At Brownberrie Lane, Horsforth, LS18 5	12	0	12	0	0	0	12	0	0
3457	North Leeds	HG2-48	Land off Weetwood Court (adjacent to water treatment v	32	0	0	0	32	0	32	0	0
4021	North Leeds	HG1-87	Horsforth Mill, Low Lane. Horsforth, LS18 4er	89	45	44	0	0	0	89	0	0
4057	North Leeds	HG2-45	Former St Josephs Convalescent Home, Outwood Lane, H	30	0	30	0	0	0	30	0	0
4216	North Leeds	HG2-30	Eyrie Public House, Holtdale Approach, Holt Park, LS16 7r	6	6	0	0	0	0	6	0	0
4217	North Leeds	HG2-32	Cookridge Fire Station, Otley Old Road, LS16 7bf	15	0	0	0	0	0	0	15	0
4233	North Leeds	HG2-34	Land Off Farrar Lane, Holt Park, LS16 7	16	0	16	0	0	0	16	0	0

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4240	North Leeds	HG2-41	South Of The A65 From Horsforth Rab To Rawdon Cremat	777	0	0	0	150	150	300	477	0
5176	North Leeds	HG1-102	29 - 31 Moor Road, Headingley, Leeds, LS6 4BG	32	0	0	32	0	0	32	0	0
5177	North Leeds	HG1-94	Land At Lakestream House, 142 Wetherby Road, Leeds, L	7	7	0	0	0	0	7	0	0
5178	North Leeds	HG1-64	Leeds Trinity University College, Brownberrie Lane, Horsfr	29	29	0	0	0	0	29	0	0
5183	North Leeds	HG1-112	Elton Lodge, Newton Road	9	0	0	9	0	0	9	0	0
5188	North Leeds	HG1-104	13 - 17 Shaw Lane, Meanwood, Leeds, LS6 4DH	31	31	0	0	0	0	31	0	0
5190	North Leeds	HG1-71	Ireland Wood Social Club, Iveson Drive, Lawnswood, Leed	1	1	0	0	0	0	1	0	0
5207	North Leeds	HG1-471	22 Shire Oak Road, Headingley, Leeds, LS6 2DE	9	9	0	0	0	0	9	0	0
5227	North Leeds	HG1-477	80 Cardigan Road, Headingley, Leeds, LS6 3BJ	16	0	16	0	0	0	16	0	0
5241	North Leeds	HG1-490	Mary Morris House, 24 Shire Oak Road, Headingley, Leed:	10	10	0	0	0	0	10	0	0
5243	North Leeds	HG1-491	135 Alwoodley Lane, Alwoodley, Leeds, LS17 7PG	5	5	0	0	0	0	5	0	0
5343	North Leeds	HG1-500	Corn Mill Fold, Low Lane, Horsforth, Leeds, LS18 5NJ	13	13	0	0	0	0	13	0	0
5345	North Leeds	HG1-502	101 Commercial Road, Kirkstall, Leeds, LS5 3AD	36	36	0	0	0	0	36	0	0
5346	North Leeds	HG1-503	Land Rear Of Shoulder Of Mutton Public House, Garmont	7	7	0	0	0	0	7	0	0
5350	North Leeds	HG2-217	Adel Eastmoor	27	0	0	27	0	0	27	0	0
5354	North Leeds	New	Land At Devonshire Lodge, Devonshire Avenue, Lidgett Pa	41	41	0	0	0	0	41	0	0
5355	North Leeds	New	Elmete Wood School , Elmete Lane , Roundhay	9	0	9	0	0	0	9	0	0
1178A	North Leeds	HG2-38	Dunstarn Lane (land south), Adel LS16	68	0	0	0	0	50	50	18	0
1199A	North Leeds	HG1-58	Moseley Wood Gardens (land off), Cookridge LS16	135	0	0	0	50	50	100	35	0
1199B	North Leeds	HG2-29	Moseley Wood Gardens (land off), Cookridge LS16	63	0	0	0	0	0	0	63	0
1299A	North Leeds	HG1-73	Otley Road - Bodington Hall, Lawnswood LS16	44	22	22	0	0	0	44	0	0
2053B	North Leeds	HG2-36	Alwoodley Lane, Alwoodley LS17	285	0	0	0	0	100	100	185	0
3010A	North Leeds	HG1-59	Land south east of Holt Park Leisure Centre, Holt Park, Le	52	0	0	26	26	0	52	0	0
3010B	North Leeds	HG2-33	Land south east of Holt Park Leisure Centre, Holt Park, Le	24	0	24	0	0	0	24	0	0
4058A	North Leeds	HG1-127	Land at 116 Cardigan Road, Headingley	14	0	0	0	14	0	14	0	0
4058B	North Leeds	HG1-506	Land at Cockcroft House, Cardigan Road, Headingley	16	0	16	0	0	0	16	0	0
5009A	North Leeds	HG1-515	Site of Leeds City College, Calverley Lane, Horsforth, Leed	72	0	0	0	72	0	72	0	0
5009B	North Leeds	HG2-43	Site of Leeds City College, Calverley Lane, Horsforth, Leed	134	0	0	0	0	0	0	134	0
15	Outer North East	HG2-26	Scarcroft Lodge Wetherby Road Scarcroft Leeds	130	0	0	0	0	0	0	130	0
90	Outer North East	HG1-39	St Vincents School, 27 Church Street, Boston Spa	13	0	0	6	7	0	13	0	0
778	Outer North East	HG1-51	Bramham House, Bowcliffe Road, Bramham	30	0	0	30	0	0	30	0	0
783	Outer North East	HG1-50	Bowcliffe Road Bramham	2	2	0	0	0	0	2	0	0

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787	Outer North East	HG1-27	Linton Springs Sicklinghall Rd, Linton	7	0	7	0	0	0	7	0	0
1008	Outer North East	HG3-10	Grove Road, Boston Spa	104	0	0	50	54	0	104	0	0
1046	Outer North East	HG1-28	Spofforth Hill, Wetherby, LS22	325	100	100	100	25	0	325	0	0
1153	Outer North East	HG2-24	Land To The North Of Keswick Lane, Bardsey Site Of The E	10	0	0	0	0	0	0	10	0
2135	Outer North East	HG3-8	Leeds Road Collingham	150	0	0	50	50	50	150	0	0
3152	Outer North East	HG1-53	Spen Common Lane, Bramham	9	0	0	9	0	0	9	0	0
4068	Outer North East	HG2-28	Land Adjacent To Belle Vue Road, Scholes	15	0	0	0	0	0	0	15	0
4070	Outer North East	HG1-54	Black Horse Farm, S Approach, Aberford, LS25 3au	1	1	0	0	0	0	1	0	0
4072	Outer North East	HG1-57	White House Farm, Bunkers Hill, Aberford, LS25	5	0	0	5	0	0	5	0	0
4074	Outer North East	HG1-34	Sandbeck Way, Wetherby	9	9	0	0	0	0	9	0	0
4075	Outer North East	HG2-20	Mercure Hotel, Leeds Road, Wetherby	86	0	0	7	0	0	7	79	0
4076	Outer North East	HG1-32	Deighton Road, Wetherby	2	2	0	0	0	0	2	0	0
4150	Outer North East	HG2-25	Land At Farfield House, Great North Road, Bramham, LS2.	14	0	0	0	0	0	0	14	0
5166	Outer North East	HG2-19	Land at Sandbeck Lane Wetherby	111	50	50	11	0	0	111	0	0
5300	Outer North East	HG2-227	Land bound by Grange Avenue, Rudgate Park, Street 5 an	142	0	0	0	0	0	0	142	0
5372	Outer North East	MX2-39	Parlington Allocation	1850	0	0	0	100	250	350	1250	250
5391	Outer North East	New	Norton House, Deighton House, Wetherby	7	0	7	0	0	0	7	0	0
1154_3132	Outer North East	HG2-22	Church Street, Boston Spa	36	0	0	0	0	0	0	36	0
33_2158_31	Outer North East	HG2-226	Land to the east of Wetherby	1080	0	0	50	100	150	300	750	30
313	Outer North West	MX2-2	Westgate, Otley	15	0	0	0	0	0	0	15	0
320	Outer North West	MX2-1	Ashfield Works, Westgate, Otley	50	0	0	0	0	0	0	50	0
364	Outer North West	HG1-25	Bramwood, 11 Creskeld Crescent, Bramhope, Leeds LS16	8	0	0	0	8	0	8	0	0
744	Outer North West	HG1-15	Rumplecroft	135	0	0	50	50	35	135	0	0
745	Outer North West	MX1-26	East Of Otley	550	0	0	30	60	60	150	330	70
1002	Outer North West	HG2-16	Land To Rear Of 45 Creskeld Lane, Bramhope	23	0	0	0	0	0	0	23	0
1122	Outer North West	MX1-1	Garnetts Paper Mill, Mill Lane , Otley	137	50	50	37	0	0	137	0	0
2130	Outer North West	HG2-18	Church Lane Adel	87	0	0	47	40	0	87	0	0
3400	Outer North West	HG2-15	Land At Green Acres, Moor Road, Bramhope, LS16 9HJ	42	0	0	0	0	0	0	42	0
4259	Outer North West	HG2-13	Former Inglewood Children's Home, Otley, LS21 3	16	0	0	0	16	0	16	0	0
5181	Outer North West	HG1-21	Development Engineering Services, Ilkley Road, Otley	12	0	0	12	0	0	12	0	0
5381	Outer North West	New	1 Union Court, Westgate , Otley	32	0	0	32	0	0	32	0	0
1080_3367A	Outer North West	HG2-17	Breary Lane East, Bramhope LS16	376	0	0	0	100	115	215	161	0

Ref	HMCA	SAP/AVL	Address	Total	17_18	18_19	19_20	20_21	21_22	ST	MT	LT
130	Outer South	MX2-14	77 - 79 Aberford Road Oulton Leeds LS26 8HS	50	0	0	0	0	0	0	50	0
133	Outer South	HG1-411	Royds Green Farm Royds Green Oulton Leeds LS26 8EZ	5	5	0	0	0	0	5	0	0
136	Outer South	HG2-177	Site At Alma Villas, Woodlesford, Leeds, LS26 8PW	12	0	0	12	0	0	12	0	0
143	Outer South	HG2-178	Site Of Glenoit And Minerva Mills Aberford Road Oulton	70	0	70	0	0	0	70	0	0
289	Outer South	HG2-186	Hunts Farm, Main Street, Methley	25	0	0	0	0	0	0	25	0
334	Outer South	HG1-403	Land Off Fleet Lane,oulton,leeds	8	8	0	0	0	0	8	0	0
335	Outer South	HG1-406	Land Off Royds Lane Rothwell Leeds	39	20	19	0	0	0	39	0	0
499	Outer South	HG1-400	Aberford Rd, Woodlesford	32	16	16	0	0	0	32	0	0
507	Outer South	HG1-410	Main Street Carlton	15	0	0	15	0	0	15	0	0
515	Outer South	HG1-415	Former Bay Horse, Main St, Methley	1	1	0	0	0	0	1	0	0
523	Outer South	HG1-416	Pinfold Lane, Wmc, Methley	6	6	0	0	0	0	6	0	0
1035	Outer South	HG2-179	Land At Fleet Lane / Eshald Lane, Oulton, LS26 8ht	40	0	0	0	0	40	40	0	0
1359	Outer South	HG2-174	Rothwell Garden Centre, Wood Lane, Rothwell, LS26	83	0	0	0	0	50	50	33	0
3088	Outer South	HG2-184	Land East Of Shop Lane, Lofthouse, Wakefield, WF3 3pd	31	0	0	0	0	0	0	31	0
4082	Outer South	HG2-176	Windlesford Green Hostel, Woodlesford	26	0	0	0	26	0	26	0	0
5129	Outer South	HG1-408	Sharp Lane Robin Hood	9	9	0	0	0	0	9	0	0
5149	Outer South	HG1-407	China Red Dragon, 3 Wakefield Road, Oulton	74	0	0	74	0	0	74	0	0
5246	Outer South	HG1-494	Oulton Hall, Rothwell Lane, Rothwell, Leeds, LS26 8ZF	5	5	0	0	0	0	5	0	0
1049_1058	Outer South	HG2-173	Haighside Rothwell	578	0	0	0	0	100	100	478	0
1259B	Outer South	HG2-175	Bullough Lane - Haigh Farm (land adjacent to), Rothwell H	154	0	0	0	0	50	50	104	0
1261_4220	Outer South	HG2-185	Church Farm And Surrounding Land North Of M62, Lofthc	188	0	0	0	0	0	0	150	38
129A	Outer South	HG2-182	Main Street and Pitfield Road, Carlton, Wakefield	36	0	36	0	0	0	36	0	0
1365A	Outer South	HG2-183	Swithens Lane, Rothwell, Leeds LS26 OBS	136	0	0	0	0	50	50	86	0
2129A	Outer South	HG1-412	Mickletown Road Methley	6	0	0	0	0	6	6	0	0
2129B	Outer South	HG1-413	Mickletown Road Methley	184	0	50	50	50	34	184	0	0
3445A	Outer South	HG2-181	Land at Leadwell Lane, Robin Hood	60	0	0	0	0	0	0	60	0
4222A_B_C	Outer South	HG2-180	Fleet Lane And Methley Lane, Oulton, LS26 8	322	0	0	0	0	322	322	0	0
265	Outer South East	HG2-129	Ash Tree Primary School, Leeds Road, Kippax	22	0	22	0	0	0	22	0	0
298	Outer South East	HG1-319	Hollinshurst Depot Queen Street Allerton Bywater	27	27	0	0	0	0	27	0	0
310	Outer South East	HG2-135	Barnsdale Road, Allerton Bywater	49	0	0	0	0	0	0	49	0
818	Outer South East	MX1-27	Station Road, Allerton Bywater	95	50	45	0	0	0	95	0	0
820	Outer South East	HG1-305	South Of Old Micklefield	150	0	0	50	50	50	150	0	0

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825	Outer South East	HG1-306	Manor Farm Bldgs, Micklefield	14	0	14	0	0	0	14	0	0
827	Outer South East	HG2-134	Carlton View, Allerton Bywater	25	0	0	0	0	0	0	25	0
836	Outer South East	HG1-308	Barleyhill Road Garforth	13	13	0	0	0	0	13	0	0
1118	Outer South East	HG1-307	Church Lane And Manor Farm, Micklefield	390	40	50	50	50	50	240	150	0
1174	Outer South East	HG2-126	Land To North Of Micklefield Railway Station Car Park, Mi	18	0	0	0	0	0	0	18	0
1176	Outer South East	HG2-125	Land To The South Of Pit Lane, Micklefield, LS25	79	0	0	0	0	0	0	79	0
1357	Outer South East	HG2-133	Ninevah Lane, Allerton Bywater	57	0	0	0	0	0	0	57	0
2131	Outer South East	HG3-19	Moorgate Kippax	156	50	50	50	6	0	156	0	0
3352	Outer South East	HG1-315	51 Westfield Lane, Kippax, Leeds, LS25 7ja	6	6	0	0	0	0	6	0	0
4083	Outer South East	HG1-310	Grange Court, Church Gardens, Garforth	58	0	0	25	25	8	58	0	0
4196	Outer South East	HG1-316	Royal Oak, Cross Hills, Kippax, Leeds, LS25	4	4	0	0	0	0	4	0	0
5013	Outer South East	HG2-130	Land At 25 - 29 High Street, Kippax	16	0	16	0	0	0	16	0	0
5193	Outer South East	HG1-321	Land Adjacent To West Court, Park Lane, Allerton Bywate	5	5	0	0	0	0	5	0	0
5208	Outer South East	HG1-472	Ledston Hall, Hall Lane, Ledston, Leeds, WF10 2BB	10	10	0	0	0	0	10	0	0
5268	Outer South East	HG2-235	Stocks Blocks site, Ninelands Lane, Garforth	240	0	50	50	50	50	200	40	0
1175A	Outer South East	HG2-132	Brigshaw Lane (land to east of), Kippax	76	0	0	0	0	0	0	76	0
1232B	Outer South East	HG2-124	Stourton Grange Farm South, Selby Road - Ridge Road, Ga	2314	0	0	275	275	300	850	1250	214
3100B	Outer South East	HG2-131	Whitehouse Lane, Great Preston	40	0	0	0	0	0	0	40	0
3109C	Outer South East	HG2-128	Selby Road/Leeds Road, Kippax	40	0	0	0	0	0	0	40	0
4200B	Outer South East	HG2-127	Newtown Farm, Micklefield	42	0	0	0	0	0	0	42	0
141	Outer South West	HG2-158	Tingley Mills Tingley Common Morley Leeds	100	0	0	0	0	0	0	100	0
333	Outer South West	HG2-142	Off Whitehall Road Drighlington BD11 1bx	49	0	0	0	0	0	0	49	0
341	Outer South West	HG2-139	Jubilee Works, Old Lane, Beeston	44	0	0	0	44	0	44	0	0
375	Outer South West	HG1-392	The Old Hall Yard Main Street East Ardsley WF3 2ap	6	0	0	6	0	0	6	0	0
481	Outer South West	HG1-327	Barkly Road LS11	25	0	0	0	0	0	0	25	0
495	Outer South West	HG1-379	Fall Lane (west) East Ardsley	64	34	30	0	0	0	64	0	0
502	Outer South West	HG1-357	Sharp Lane C	49	30	19	0	0	0	49	0	0
509	Outer South West	HG1-353	Lingwell Road, Middleton, LS10	17	0	17	0	0	0	17	0	0
527	Outer South West	HG1-390	Bradford Road, Ardsley Common	8	8	0	0	0	0	8	0	0
536	Outer South West	HG1-394	Woolin Crescent West Ardsley	28	0	0	0	28	0	28	0	0
547	Outer South West	HG1-350	Park Mills South St Morley	33	0	0	18	15	0	33	0	0
551	Outer South West	HG1-393	Manor House Farm, Baghill Green Wa	6	6	0	0	0	0	6	0	0

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563	Outer South West	HG1-344	Albert Road Morley	40	0	0	20	20	0	40	0	0
637	Outer South West	HG1-325	Royds Lane, Wortley, LS12	85	50	35	0	0	0	85	0	0
1029	Outer South West	HG2-166	Land Of Long Thorpe Lane, Thorpe, Wakefield, WF3 3bz	17	0	0	17	0	0	17	0	0
1032	Outer South West	HG3-24	Land Off Bradford Road , East Ardsley WF3	315	0	0	50	100	100	250	65	0
1038	Outer South West	HG1-385	7a Waterword Close, Tingley, WF3 1ql	3	3	0	0	0	0	3	0	0
1077	Outer South West	HG1-333	Nethertown Pig Farm, Old Lane, Drighlington, Leeds, BD1	23	0	0	0	23	0	23	0	0
1282	Outer South West	HG2-149	Lane Side Farm Pas Morley	550	0	0	100	150	150	400	150	0
1285	Outer South West	HG1-351	Owlers Farm Pas , Wide Lane, Morley	114	25	50	39	0	0	114	0	0
1319	Outer South West	HG1-517	Land North Of Albert Road , Morley	61	50	11	0	0	0	61	0	0
1320	Outer South West	HG1-514	Lower Moor Farm Pas , Albert Drive, Morley	200	0	0	50	50	50	150	50	0
1344	Outer South West	HG2-144	Westfield Farm Drighlington, Bd11	17	0	0	0	0	0	0	17	0
2036	Outer South West	HG2-156	Rod Mills Lane, High Street, Morley	15	0	15	0	0	0	15	0	0
3188	Outer South West	HG1-360	Corporation Street Morley	22	0	0	0	22	0	22	0	0
3214	Outer South West	HG1-395	Batley Road West Ardsley	2	2	0	0	0	0	2	0	0
3216	Outer South West	HG1-336	Wakefield Road Drighlington	5	5	0	0	0	0	5	0	0
3350	Outer South West	HG1-375	309 Leeds Road, Lofthouse, WF3 3qd	1	1	0	0	0	0	1	0	0
3378	Outer South West	HG2-146	Finning (uk) Ltd, Gelderd Road, Gildersome, LS27 7JS	85	0	0	0	0	0	0	85	0
3386	Outer South West	HG2-137	Site of Makro Supermarket on Royds Lane, Lower Wortley	111	0	0	0	0	0	0	111	0
3394	Outer South West	HG2-140	Sugar Mill, Oakhurst Avenue (just Off Dewsbury Road), Le	60	0	0	0	0	0	0	60	0
3428	Outer South West	HG1-340	Land Off Daisy Hill Close, Morley, Leeds	13	13	0	0	0	0	13	0	0
4002	Outer South West	HG2-138	Park Lees, St Anthony's Road, Beeston	18	0	0	0	18	0	18	0	0
4004	Outer South West	HG2-165	Thorpe Hill Farm, Lingwell Gate Lane, Thorpe	57	0	0	25	37	0	62	0	0
4032	Outer South West	HG2-164	Thorpe Square, Middleton, LS10	37	0	0	0	20	17	37	0	0
4034	Outer South West	HG2-160	Sissons Drive/sissons Road, Middleton	14	0	0	0	14	0	14	0	0
4035	Outer South West	HG2-161	Throstle Mount, Middleton	15	0	0	0	15	0	15	0	0
4053	Outer South West	HG2-155	Joseph Priestley College, Peel Street, Morley	28	0	28	0	0	0	28	0	0
4198	Outer South West	HG1-346	St Marys Congregational Church, Commercial Street, Mor	18	0	0	18	0	0	18	0	0
5100	Outer South West	HG1-335	Leeds Valve Co Ltd, 23 - 25 Town End, Gildersome, Morle	9	0	0	9	0	0	9	0	0
5113	Outer South West	HG1-331	2 Back Lane, Drighlington, BD11 1LS	3	3	0	0	0	0	3	0	0
5117	Outer South West	HG1-388	Timber Tops Forsythia Avenue East Ardsley	8	0	0	8	0	0	8	0	0
5130	Outer South West	HG1-389	Fall Lane East Ardsley	26	0	0	26	0	0	26	0	0
5131	Outer South West	HG1-334	Reedsdale Gardens Gildersome	15	0	0	0	15	0	15	0	0

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5137	Outer South West	HG1-349	SOUTH PARADE MORLEY	5	5	0	0	0	0	5	0	0
5165	Outer South West	HG2-233	Land at Moor Knoll Lane East Ardsley	11	0	0	0	0	0	0	11	0
5191	Outer South West	HG1-373	Summerfield Court Residential Home, Britannia Road Morley	7	7	0	0	0	0	7	0	0
5202	Outer South West	HG1-467	Former Railway Public House, Moor Knoll Lane, East Ardsley	14	14	0	0	0	0	14	0	0
5228	Outer South West	HG1-478	Land Along Park Wood Road, Beeston, Leeds, LS11	4	4	0	0	0	0	4	0	0
5336	Outer South West	HG2-231	Throstle Terrace	15	0	15	0	0	0	15	0	0
5339	Outer South West	HG2-232	Towcester Avenue	41	20	21	0	0	0	41	0	0
5377	Outer South West	New	Former Site of Barfield House, Britannia Road, Morley	8	0	0	8	0	0	8	0	0
5387	Outer South West	New	Quarry Court, High Street , Morley	9	0	0	9	0	0	9	0	0
5388	Outer South West	New	Valley Mills, Whitehall Road, Drighlington	44	0	0	0	22	22	44	0	0
1064A	Outer South West	HG1-513	Bruntcliffe Road and Scott lane, Morley Leeds LS27	115	0	0	50	50	15	115	0	0
143B_D	Outer South West	HG2-167	Site of Estoro Farm and land adjacent to football ground	619	0	0	0	0	0	0	450	169
1171B	Outer South West	HG2-136	Whitehall Road (south of) - Harpers Farm	279	0	0	0	0	100	100	179	0
1200A	Outer South West	HG2-147	Highfield Drive/Harthill Lane (land off), Gildersome LS27	76	0	0	0	0	0	0	76	0
1220A	Outer South West	HG2-150	Churwell (land to the east of) LS27	205	0	0	0	0	100	100	105	0
12105_3365	Outer South West	HG2-171	Westerton Road, Tingley, WF3	195	0	0	0	0	0	0	150	45
1281A	Outer South West	HG1-370	Bruntcliffe Road, Morley	81	40	41	0	0	0	81	0	0
1281B	Outer South West	HG1-371	Bruntcliffe Road, Morley	61	0	30	31	0	0	61	0	0
1284A_4211	Outer South West	HG2-153	Albert Drive, Morley	121	0	0	50	50	21	121	0	0
1330A	Outer South West	HG1-383	Haigh Moor Road - Jude's Point, West Ardsley, WF3 1EF P	3	3	0	0	0	0	3	0	0
137A	Outer South West	HG2-157	Britannia Road, Morley	63	0	0	0	0	63	63	0	0
2098A_C	Outer South West	HG2-159	Sissons Farm, Middleton, LS10	222	0	0	50	75	75	200	22	0
2100A	Outer South West	HG1-368	Throstle Lane Playing Fields, Middleton LS10	140	0	0	50	50	40	140	0	0
2124_3003	Outer South West	HG2-143	Spring Gardens Drighlington	250	0	0	0	0	0	0	250	0
3000_3064	Outer South West	HG2-145	Street Lane, Gildersome	393	0	0	0	0	0	0	300	93
3060A	Outer South West	HG2-148	Gelder Road/M621, Gildersome	203	0	0	0	0	0	0	203	0
3373A	Outer South West	HG2-168	Haigh Wood, Ardsley	108	0	0	0	0	0	0	108	0
3373C	Outer South West	HG2-169	Haigh Wood, Ardsley	262	0	0	0	0	0	0	262	0
3456A	Outer South West	HG2-170	Land off Haigh Moor Road	41	0	0	0	0	0	0	41	0
26	Outer West	HG1-156	Land North Of Morrisons Swinnow Road Swinnow Leeds	25	0	0	0	25	0	25	0	0
33	Outer West	HG1-198	Daytona Works Carlisle Road Pudsey Leeds LS28 8PL	18	0	18	0	0	0	18	0	0
41	Outer West	HG1-183	Moorfield Road / Tower Works	62	0	0	0	31	31	62	0	0

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64	Outer West	HG1-206	South Park Mills, 15, 15a, 16 And 17, Acrivan Ltd, Fulneck	21	0	0	0	21	0	21	0	0
163	Outer West	HG1-142	Salvation Army, 139 Broad Lane, Bramley, Leeds	28	0	0	20	8	0	28	0	0
242	Outer West	HG1-154	Fairfield Grove (Fairfields), Bramley	16	5	11	0	0	0	16	0	0
254	Outer West	HG2-84	Oldfield Lane (leeds City Boy's Pitch) LS12	61	0	0	0	61	0	61	0	0
595	Outer West	HG1-205	Cliff House Fawcett Lane LS12	7	0	0	7	0	0	7	0	0
602	Outer West	HG1-131	Pollard Lane LS13	136	40	40	40	16	0	136	0	0
613	Outer West	HG1-155	Elder Road/Swinnow Road LS13	25	0	0	25	0	0	25	0	0
625	Outer West	HG1-145	Canal Wharf Wyther Lane LS5	64	0	0	64	0	0	64	0	0
636	Outer West	HG1-152	Westfield Mill Broad Lane LS13	133	0	0	33	50	50	133	0	0
638	Outer West	HG1-194	Ashley Road LS12	7	7	0	0	0	0	7	0	0
644	Outer West	HG1-190	Berry Mount Wood Lane LS12	12	0	0	12	0	0	12	0	0
645	Outer West	HG1-134	Bagley Lane Farsley	13	13	0	0	0	0	13	0	0
646	Outer West	HG1-168	Delph End Pudsey	32	16	16	0	0	0	32	0	0
649	Outer West	HG1-161	Charity Farm, Swinnow	50	0	0	25	25	0	50	0	0
650	Outer West	HG1-177	Lane End, Pudsey	20	0	0	10	10	0	20	0	0
653	Outer West	HG1-189	Robin Lane/longfield Road, Pudsey	28	0	0	0	28	0	28	0	0
656	Outer West	HG1-181	Pudsey Road, Bramley, LS 13	10	0	0	0	10	0	10	0	0
659	Outer West	HG2-74	Station Street, Pudsey	20	0	0	0	20	0	20	0	0
678	Outer West	HG1-162	83-105 Bradford Road Stanningley	78	0	0	0	0	0	0	50	28
1124	Outer West	HG2-54	Land Off Upper Carr Lane, Calverley	18	0	0	0	0	0	0	18	0
1195	Outer West	HG2-68	Land At Waterloo Road, Pudsey LS28	35	0	0	35	0	0	35	0	0
1201	Outer West	HG2-63	Land Adjoining Woodhall Road - Gain Lane, Thornbury Bd	196	0	0	0	50	50	100	96	0
1322	Outer West	HG2-58	Airedale Mills, Rodley	5	0	0	0	5	0	5	0	0
1337	Outer West	HG1-130	Stylo House, Harrogate Road, Apperley Bridge Bradford B	1	1	0	0	0	0	1	0	0
2120	Outer West	HG2-66	Hill Foot Farm, Pudsey	70	0	0	70	0	0	70	0	0
2121	Outer West	HG1-133	Calverley Lane, Farsley	31	20	11	0	0	0	31	0	0
3121	Outer West	HG2-70	Land At Rear Of 41 Tyersal Avenue, Tyersal, Bradford, Bd	27	0	0	0	27	0	27	0	0
3196	Outer West	HG1-157	Elder Road LS13	22	0	0	22	0	0	22	0	0
3203	Outer West	HG1-200	Lumby Lane, Pudsey	12	0	0	12	0	0	12	0	0
3302	Outer West	HG1-149	Old Road, Farsley, Pudsey, LS28 5dj	10	0	0	0	0	0	0	10	0
3304	Outer West	HG1-140	The Old Vic, 17 Whitecote Hill, Bramley, Leeds	9	0	0	9	0	0	9	0	0
3379	Outer West	HG1-196	Green Lane, Pudsey, LS28 8jn	1	1	0	0	0	0	1	0	0

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3412	Outer West	MX2-5	Site At Waterloo Lane And Waterloo Way, LS13 2, Leeds	20	0	0	0	0	0	0	20	0
3464	Outer West	HG2-72	Land Off Tyersal Court, Tyersal Bd4 8	40	0	0	0	40	0	40	0	0
4007	Outer West	HG2-82	Wortley High School And Leeds West City Learning Centre	40	0	0	0	0	0	0	40	0
4036	Outer West	HG2-83	Thornhill Road, Upper Wortley, LS12 4lg	14	0	0	14	0	0	14	0	0
4039	Outer West	HG2-77	Regina House, Ring Road, Bramley, LS13 4et	64	0	0	0	0	0	0	64	0
4046	Outer West	HG2-65	Daleside Road, Pudsey	89	0	0	40	49	0	89	0	0
4047	Outer West	HG2-64	Sunnybank Lane, Pudsey	22	0	22	0	0	0	22	0	0
4049	Outer West	HG2-55	Calverley Lane, Calverley	18	0	0	0	0	0	0	18	0
4097	Outer West	HG2-53	Calverley Cutting, Leeds Liverpool Canal, Apperley Bridge	32	0	0	32	0	0	32	0	0
4169	Outer West	HG2-71	Land Off Tyersal Road, Pudsey, Bd4 8ez	33	0	0	0	33	0	33	0	0
4197	Outer West	HG1-188	St Lawrence House, Crawshaw Road, Pudsey, LS28 7ub	1	1	0	0	0	0	1	0	0
4199	Outer West	HG1-158	Town End Works, Back Lane, Bramley, Leeds, LS13 4es	28	0	0	14	14	0	28	0	0
4213	Outer West	HG2-59	Land On North East Side Of Rodley Lane, Rodley	17	0	0	0	0	17	17	0	0
5114	Outer West	HG1-151	Land And Premises Opposite 60 To 68, Half Mile Lane, Sta	12	0	0	12	0	0	12	0	0
5118	Outer West	HG1-199	Roker Lane/Hare Lane	8	0	8	0	0	0	8	0	0
5120	Outer West	HG1-139	Whitecote Hill LS13	5	5	0	0	0	0	5	0	0
5135	Outer West	HG2-75	Musgrave Court Crawshaw Road Pudsey	14	0	0	0	14	0	14	0	0
5136	Outer West	HG1-507	Hillside Reception Centre Leeds and Bradford Road Braml	20	20	0	0	0	0	20	0	0
5185	Outer West	HG1-180	Former Garage Site, Harley Green	8	0	8	0	0	0	8	0	0
5194	Outer West	MX1-4	Sunny Bank Mills, Town Street, Farsley, LS28 5UJ	12	0	0	12	0	0	12	0	0
5203	Outer West	HG1-468	The Swinnow, Swinnow Lane, Swinnow, Leeds, LS13 4QX	14	0	0	14	0	0	14	0	0
5204	Outer West	HG1-469	3 Crowther Avenue, Calverley, Pudsey, LS28 5SA	5	0	0	5	0	0	5	0	0
5209	Outer West	HG1-473	Broadlea Street, Leeds, LS13 2SD	24	24	0	0	0	0	24	0	0
5226	Outer West	HG1-476	Land South Of By Pass, Hough End Lane, Bramley, Leeds, l	36	0	0	36	0	0	36	0	0
5238	Outer West	HG1-488	Block 1, Whingate House, Whingate, Armley	34	34	0	0	0	0	34	0	0
5249	Outer West	HG1-497	Former Farnley Working Mens Club, Butt Lane, Farnley, L	8	8	0	0	0	0	8	0	0
5286	Outer West	HG2-204	Wood Nook, North of the B6155, Pudsey	60	0	60	0	0	0	60	0	0
5303	Outer West	HG2-205	Stonebridge Mills, Farnley	75	0	25	25	25	0	75	0	0
5305	Outer West	HG2-207	Hough Top Court Amenity Space, Hough Top, Pudsey	76	0	0	0	0	0	0	76	0
5337	Outer West	HG2-206	Heights Lane, Armley	28	0	28	0	0	0	28	0	0
5344	Outer West	HG1-501	Site Of The Former Christ Church Vicarage, Armley Ridge l	9	9	0	0	0	0	9	0	0
5379	Outer West	New	Green Flag House And Park House, Cote Lane, Farsley, Pu	139	0	139	0	0	0	139	0	0

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5380	Outer West	New	Land Off Carlise Road, Pudsey	8	0	0	8	0	0	8	0	0
5382	Outer West	New	Bramley Liberal Club, 14 Hough Lane , Bramley	7	0	7	0	0	0	7	0	0
5390	Outer West	New	Land Adjacent To 320 Pudsey Road, Bramley	9	0	0	9	0	0	9	0	0
1060A_3377/	Outer West	HG2-76	Houghside Pudsey, LS28	200	0	0	50	75	75	200	0	0
1073A_3440	Outer West	HG2-67	Owlcotes Farm/Owlcotes Gardens Pudsey	92	0	0	0	12	40	52	40	0
1184_3050	Outer West	HG2-80	Land At Acres Hall Avenue, Pudsey, LS28	62	0	0	0	0	62	62	0	0
1193A	Outer West	HG2-56	Rodley Lane (land at) - Calverley Lane, Calverley LS19	53	0	0	0	0	53	53	0	0
1343A	Outer West	HG2-73	Harper Gate Farm, Tyersal Lane, Bradford BD4 ORD	270	25	50	50	50	50	225	45	0
3011_4044	Outer West	HG2-69	Dick Lane, Thornbury, Bradford, BD3	206	0	0	0	100	106	206	0	0
4042A	Outer West	HG2-61	Raynville Road/Raynville Crescent, Bramley (East)	14	14	0	0	0	0	14	0	0
4249_5010	Outer West	HG2-200	Stanningly Road, LS12 3qs	22	0	0	0	22	0	22	0	0