

Affordable Housing by Private Developers

Report published May 2012

Last update November 2012

	Recommendation	Stage	Complete
1	<p>That as the Executive Board sets the policy in relation to the number of affordable homes required by the housing area we believe any variations from that policy should be referred back to the Executive Board for approval. However, this should only take place after the relevant Plans Panels has reviewed the financial viability assessment submitted by developers. The Executive Board is asked to approve this approach.</p>		
	<p>November 2013 update <i>Response as Nov 2012. Decisions on the appropriateness of individual S.106 Agreements are taken by the Plans Panel as they are integral to the process of determining planning applications and as to whether or not planning permission should be granted in the light of all material circumstances. S.106 Agreements cannot therefore be separated from the planning consent as suggested. In addition, affordable housing is usually only one of a number of obligations and these need to be judged in the round, rather than in isolation as the recommendation suggests.</i></p> <p><i>Plans Panel are constituted for the purpose of taking decisions on planning applications, including s106 agreements. Therefore Executive Board is requested to support the proposal for annual review but recognise the role of Plans Panel in determining individual planning applications and associated s.106 Agreements</i></p> <p><i>Monitoring of the effectiveness of affordable housing policy is best aligned with the Authority Monitoring Report (AMR) which monitors the number of affordable housing completions on an annual basis in March and provides a wider housing context of the housing market.</i></p> <p><u>Formal Response (received November 2012)</u> <i>To help keep Executive Board informed of the effectiveness of affordable housing policy annual reports will be provided to Executive Board. Executive Board's overview will be welcome on the effectiveness of the policy.</i></p> <p><i>Decisions on the appropriateness of individual S.106 Agreements are taken by the Plans Panel as they are integral to the process of determining planning applications and as to whether or not planning permission should be granted in the light of all material circumstances. S.106 Agreements cannot therefore be separated from the planning consent as suggested. In addition, affordable housing is usually only one of a number of obligations and these need to be judged in the round, rather than in isolation as the recommendation suggests.</i></p> <p><i>Plans Panels are constituted for the purpose of taking decisions on planning applications, including S.106 Agreements. Therefore Executive Board is requested to support the proposal for annual review but recognise the role of Plans Panel in determining individual planning applications and associated s.106 Agreements.</i></p>	<p>4 Not achieved (Progress made acceptable. Continue monitoring.)</p>	

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2	<p>That the Executive Board withdraws the 2011 interim housing policy as a matter of urgency and reinstate the 2008 affordable housing targets in relation to green field sites.</p>																	
	<p><u>November 2013 update</u> <i>Response as November 2012. Affordable housing targets are based on viability evidence in the Economic Viability Assessment (EVA) (June 2010), and Community Infrastructure Levy -CIL (EVA) (Jan 2013).</i></p> <p><i>An exercise has been carried out to compare the total amount of housing permitted and the total number of affordable dwellings agreed in the three financial years of 2010/11, which came before adoption of the interim policy, and 2011 till 2013 which came largely after the adoption. In terms of schemes permitted, indications are that the policy so far has had some success in stimulating housing development overall and increasing numbers of affordable dwellings permitted. The exercise excluded housing proposals that would not generate affordable housing, such as small schemes of less than 15 units, student schemes and 100% affordable housing schemes.</i></p> <table border="1" style="margin-left: auto; margin-right: auto; border-collapse: collapse; text-align: center;"> <thead> <tr> <th colspan="3"><i>Dwellings permitted</i></th> </tr> <tr> <th><i>Year</i></th> <th><i>Total Housing</i></th> <th><i>Affordable Housing</i></th> </tr> </thead> <tbody> <tr> <td><i>2010/11</i></td> <td><i>419</i></td> <td><i>118</i></td> </tr> <tr> <td><i>2011/12</i></td> <td><i>761</i></td> <td><i>148</i></td> </tr> <tr> <td><i>2012/13</i></td> <td><i>1589</i></td> <td><i>276</i></td> </tr> </tbody> </table> <p><i>The Core Strategy has recently (Oct 13) been the subject of Examination and it is necessary to await the Planning Inspector's recommendations on whether a Supplementary Planning Document (SPD) can be legitimately used to set out Leeds' affordable housing targets.</i></p> <p><u><i>Formal Response (received November 2012)</i></u> <i>The Directorate recognises the concern raised by Scrutiny about the delivery of affordable housing on greenfield sites and in the case of the applications which were the subject of Public Inquiries, that developers are required to prove why they cannot meet agreed obligations. However, rather than reinstate the original policy targets now it is suggested that we assess the effectiveness of the interim policy. The reasons for this are set out below:</i></p> <p><i>The National Planning Policy Framework (NPPF) establishes the approach for local authorities to assess the viability of policies for schemes that provide affordable housing. Para 173 states, "...to ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing landowner and willing developer to enable the development to be deliverable."</i></p>	<i>Dwellings permitted</i>			<i>Year</i>	<i>Total Housing</i>	<i>Affordable Housing</i>	<i>2010/11</i>	<i>419</i>	<i>118</i>	<i>2011/12</i>	<i>761</i>	<i>148</i>	<i>2012/13</i>	<i>1589</i>	<i>276</i>	<p>4 Not achieved (Progress made acceptable. Continue monitoring.)</p>	
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In relation to the housebuilder evidence quoted in the Scrutiny report, whilst it is accepted in theory that landowners would be the prime beneficiary of reductions in affordable housing requirements, land will only come forward for development if a landowner gets a reasonable price for his land. Therefore, in practice, a reduction in the affordable housing requirement is likely to stimulate the availability of land for the delivery of new homes.

The evidence which led to the introduction of the interim policy – the Economic Viability Assessment (EVA) by DTZ 2010 was prepared using a methodology which is consistent with NPPF guidance. Economic conditions do not appear to have improved. The EVA was based on hypothetical sites with no abnormal development costs; effectively, the EVA assumed that all sites were green field.

All the evidence, including any changes in market conditions, and monitoring of actual numbers will be reported to the Executive Board when it reconsiders the interim policy.

As lead-in times for housing development are long, sufficient time needs to be taken for the new policy to be monitored. Dwelling completions are only likely to be affected by the interim policy over the next 12-18 months, so it would be more useful for any evaluation to look at permissions as well as completions.

In terms of schemes permitted, indications are that the policy so far has had marginal success in stimulating housing development overall and increasing numbers of affordable dwellings secured. An exercise has been carried out to compare the total amount of housing permitted and the total number of affordable dwellings agreed in the two financial years of 2010/11, which came before adoption of the interim policy, and 2011/12, which came largely after the adoption. The exercise excluded housing proposals that would not generate affordable housing, such as small schemes of less than 15 units, student schemes and 100% affordable housing schemes.

<i>Dwellings permitted</i>		
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We will also examine the impact of the economic situation since the EVA 2010 was undertaken on housing policies.

Executive Board concluded in January 2012 that a report on the effectiveness of the interim policy should be taken back to Executive Board in the summer of 2012. However, as indicated above it will be some time before a meaningful number of schemes based on the new targets have received planning permission with a reasonable lead in time for development. A monitoring report will therefore be prepared for Executive Board in due course.

In addition it should be recognised that the work being undertaken by GVA on viability in association with the CIL proposals will need to factor in affordable housing requirements. This will provide the most up to date information on viability that we have and any change in the position on affordable housing should await this study and emerging views on CIL charging rates.

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	Recommendation	Stage	Complete
3 (i)	<p>That the Executive Board request the Directors of City Development and Environment and Neighbourhoods as appropriate to undertake further work and review the opportunities and potential for a visionary new housing management role for the Council or external provider to remove the barriers around investment in residential properties and affordable homes in the city.</p>		
	<p><u>November 2013 update</u> <i>Work to explore how investment, particularly institutional investment, into housing can be increased has been undertaken and includes the development of a project which could potentially access the HCA's Build to Rent funding (in conjunction with Leeds City Region) in addition to approaches from individual investment companies. The viability of such models is being carefully considered and factors such as market rent levels across the city's housing markets often play a key part in the extent to which the financing of such models works. In terms of the council providing housing management services for such schemes, each proposition can be looked at individually and a view taken on the extent to which the council might wish to undertake the revenue risk (i.e. the management of lettings, void periods and turnover) evaluated. Partnerships with other organisations such as housing associations may provide an alternative to the operation of potential schemes.</i></p> <p><i><u>Formal Response (received November 2012)</u></i> <i>The potential for institutional investment to support housing growth in Leeds through the expansion of the private rented sector needs further exploration and the proposed review is supported.</i></p> <p><i>There are several elements which need to be considered as part of the approach – the numbers of units required to make the investment attractive to the institutions, the type of delivery vehicle adopted and timescale, property types, tenure and location, demand and revenue risk in addition to the housing management arrangements. Management of an expanded private rented sector will need to reflect the requirements of this new housing product and meet the needs of the investors in terms of the revenue stream.</i></p>	<p style="text-align: center;">4 Not achieved (Progress made acceptable. Continue monitoring.)</p> <p style="text-align: center;">Or</p> <p style="text-align: center;">5 Not achieved (Progress made not acceptable. Scrutiny Board to determine appropriate action and continue monitoring.)</p>	

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3 (ii)	<p>That the Executive Board request the Directors of City Development and Environment and Neighbourhoods as appropriate to include in that review whether there are any benefits to Leeds adding affordable rents in the tenure split of intermediate and social housing, to determine whether there would be any benefit from the variation of transfer values in the calculations for the provision of affordable homes.</p>		
	<p><u>November 2013 update</u> <i>Affordable Rent (defined as up to 80% market rent) is commonly used by Registered Providers (housing associations) and properties let at affordable rent are viewed by the Homes and Communities Agency as social housing. Planning policy currently differentiates between social and affordable rent and the latter is seen as an intermediate product with the policy. The benchmark prices or transfer values set within the policy enable RPs to acquire properties and service the borrowing associated with the acquisition, for affordable rents this is set at the higher intermediate product rate. As the Nov 12 update suggests, this could be usefully reviewed as part of the Supplementary Planning Document.</i></p> <p><i><u>Formal Response (received November 2012)</u></i> <i>Affordable rent is a delivery model that is already possible using current affordable housing policy and practice. The City Council would need to be satisfied that rents charged (up-to-80% of local market rents) would be genuinely affordable to households in need. The review will examine how best to use “affordable rent” as a form of affordable housing and set out the circumstances where it would be best employed.</i></p> <p><i>The methodology for establishing “transfer values” used in Leeds was established around 10 years ago through consultation with Registered Providers and housebuilders. Although annual updates have taken place there has not been a full review. As Scrutiny Board has recommended, a review would be worthwhile now. It would need to consider best practice in other local authorities, local evidence of housing need and earnings and the HCA’s rent/affordability models and policies. It would also consider the relationship between rents and transfer rates. This would need to evaluate whether any gains in the number of affordable dwellings delivered are not outweighed by reductions in their affordability to households in need. Consultation with registered providers and housebuilders would take place through preparation of the Supplementary Planning Document on affordable housing.</i></p>	<p>4 Not achieved (Progress made acceptable. Continue monitoring.)</p>	

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3 (iii)	<p>That the Executive Board request the Directors of City Development and Environment and Neighbourhoods as appropriate to consider in consultation with Ward Members if a reduction in affordable housing could be achieved in one area to benefit another through a strategic regeneration approach. Where such agreements are reached a higher rate of CIL should be retained in the host area. For example if a site attracts 35% affordable housing; by negotiation with Ward Members 20% may be ‘passported’ to a priority regeneration area. In return the CIL retention to the donor area would be no less than 85%.</p>		
	<p><u>November 2013 update</u> <i>The Council is reflecting the NPPF relating to the use of commuted sums from housing as a lever for investment in the inner area. Paragraph 50 of the NPPF notes that affordable housing should be met on-site “unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities.” Within this context the Core Strategy makes reference (paragraph 5.2.6) to “providing higher levels of Affordable Housing through off-site contributions or the use of City Council assets (within regeneration areas)...”. In the context of current market conditions and lack of viability of some brownfield sites the council will need to give careful consideration to the potential for off-site affordable and/or commuted sums to act as a stimulus for addressing market failure. The Councils approach in allowing off-site contributions is not linked to CIL. The priorities for the use of CIL receipts needs to be considered in the round, including the balance between local and strategic spend.</i></p> <p><i><u>Formal Response (received November 2012)</u></i> <i>The NPPF cautions that agreements for off-site affordable housing provision need to “...contribute to the objective of creating mixed and balanced communities.”</i></p> <p><i>Any changes to the Council’s approach would need to have regard to this objective and be considered on a site by site basis. As recognised by the Scrutiny Working Group, however in certain circumstances off-site provision could provide a very beneficial outcome for the Council and can support wider regeneration objectives and the recommendation will be actively considered.</i></p> <p><i>The proposal to retain such a high proportion of CIL for the local community is premature until a full review of the CIL Charging Regime is completed. This will include consideration of the meaningful proportion of receipts that it is appropriate to retain locally.</i></p>	<p>2 (achieved) for 1st sentence.</p> <p>6 (not for review this session) for remainder</p>	

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	Recommendation	Stage	Complete
4	<p>That the Directors of City Development and Environment and Neighbourhoods, as appropriate, work closely with all relevant financial institutions to identify and report back to the appropriate Scrutiny Board on ways to deliver the affordable homes needed in the city.</p>		
	<p><u>November 2013 update</u> <i>A number of approaches have been made by institutional investors with propositions for the delivery of market and affordable housing. As indicated previously these are being examined in detail and the extent to which rent levels in the different housing markets across the city could support the cost of long term leases which are required by the institutions is being explored.</i></p> <p><i>Formal Response (received November 2012)</i> <i>Agreed, the potential role for institutional investors is being explored both locally and at City Region level.</i></p>	<p style="text-align: center;">4 Not achieved (Progress made acceptable. Continue monitoring.)</p> <p style="text-align: center;">Or</p> <p style="text-align: center;">5 Not achieved (Progress made not acceptable. Scrutiny Board to determine appropriate action and continue monitoring.)</p>	

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5	<p>That the Directors of City Development and Environment and Neighbourhoods, as appropriate, work closely with all our partners including financial institutions develop an investor model for large scale institutional investment in the rented sector and report on progress to the relevant Scrutiny Board by the Autumn of 2012.</p>		
	<p><u>November 2013 update</u> <i>This work is on-going although no one model or investor has yet emerged as a viable or value for money proposition to deliver large scale investment through the institutions. The HCA's 'Build to Rent' programme which offers loan finance to support the delivery of market rented housing, may offer an opportunity although this is an early stage and it is understood that take up has been low in the region and in the north of England generally.</i></p> <p><i><u>Formal Response (received November 2012)</u></i> <i>Agreed, the potential role for institutional investors is being considered both locally and at City Region level. This is a complex exercise which needs to consider the numbers of units required to make the investment attractive to the institutions, the delivery vehicle and timescale, property type, tenure and location, demand and revenue risk as noted above. Also, in order for the institutions to be able to spread their expose to risk beyond a single housing market area, the potential for developing the model in conjunction with other authorities within the city region may need to be considered.</i></p>	<p style="text-align: center;">4 Not achieved (Progress made acceptable. Continue monitoring.)</p> <p style="text-align: center;">Or</p> <p style="text-align: center;">5 Not achieved (Progress made not acceptable. Scrutiny Board to determine appropriate action and continue monitoring.)</p>	

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6	<p>That the Director of Environment and Neighbourhoods and the Director of City Development, as appropriate, work with the Homes and Community Agency to assist local authorities to meet their housing targets and work with financial institutions to purchase suitable repossessed properties at discounted prices as a way of meeting the housing needs of people in this city particularly those in the most deprived areas.</p>		
	<p><u>November 2013 update</u> <i>Through the Empty Homes Programme, the council is utilising HCA grant funding to acquire and refurbish properties to bring them into use as council houses. Some of these could be repossessed properties and this can be considered more generally in the context of the Council Housing Growth Programme where properties meet strategic requirements in terms of demand and stock management.</i></p> <p><u>Formal Response (received November 2012)</u> <i>Agreed, this could be a useful tool where repossessed properties are of an appropriate type to meet housing need and the purchase price is affordable to the local authority. However the authority will also need to take into account the management costs of dispersed properties and repair and maintenance costs for non standard property types. The financial implications of ensuring individual properties meet public sector decency energy efficiency standards will need to be borne in mind.</i></p>	<p>4 Not achieved (Progress made acceptable. Continue monitoring.)</p>	

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7	<p>That the Scrutiny Board reaffirms that the percentage allocation to be made available to communities from the Community Infrastructure Levy (CIL) should be 80% and that the Executive Board be asked to consider this matter again.</p>		
	<p><u>November 2013 update</u> <i>The Leeds Community Infrastructure Levy Charging Schedule has now progressed to Draft stage with public consultation on the Draft from 29th October to the 10th December 2013. This relates to the rates to be charged rather than the spending mechanisms, although it does link via the associated Draft Regulation 123 List to the overall projects and types of infrastructure which the Council's proportion of the CIL may be spent on (and therefore which S106 Agreements cannot be required towards).</i></p> <p><i>In prioritising the spending of the CIL, the Council will need to balance neighbourhood funding with funding of strategic infrastructure. There will need to be close working with communities through neighbourhood planning, the Site Allocations Plan, and other mechanisms to help to determine local infrastructure priorities. The Regulations specify that there is a duty to directly pass over a 'meaningful proportion' of the funds raised through the levy to a parish or town council for the area where the development that gave rise to the payment takes place. Where there is no town or parish council the City Council has to spend it in the local area in consultation with the community. The Government has set that the meaningful proportion for neighbourhoods that have an adopted neighbourhood plan is 25% of the CIL revenue from that area. Areas without a neighbourhood plan will receive 15% of the revenue, and this will be capped at £100 per existing dwelling in that area. The meaningful proportion can be spent on "the provision, improvement, replacement, operation or maintenance of infrastructure, or, anything else that is concerned with addressing the demands that development places on an area."</i></p> <p><i>There have been no decisions on the process to allocate or prioritise spending of the CIL and this is a workstream which will commence in the new year. However, it is worth noting that in the City Centre and Inner Area a CIL of only £5 per sqm is proposed for residential development due to viability issues. This increases up to £90 psm in the North zone. It is therefore clear that there will be disparity in CIL receipts across the District even if the same amount of development occurred in each zone.</i></p> <p><i>Sustainable Economy and Culture Scrutiny Board on the 17th September 2013 considered the Executive Board report (9th October) which outlined the Draft Charging Schedule. The notes of the Scrutiny meeting included that: "We noted that decisions on spending priorities and local apportionment of the CIL is a separate workstream, for consideration at a later date. We recommend that the Executive Board requires that the Scrutiny Board is notified of the timetable and given the opportunity to be involved in this work at the appropriate time."</i></p>	<p>1 (Stop monitoring)</p>	

Formal Response (received November 2012)

The Departments recognise Scrutiny Board's concern that communities are sometimes adversely affected by development impacts. One of the mechanisms to help mitigate these effects is available now and will continue to be available in the form of S106s that deal with site impacts. CIL is a new mechanism which the Government intends, "...to provide infrastructure to support the development of an area rather than to make individual planning applications acceptable". This purpose could be compromised if 80% were to be allocated to locality projects especially as a large number of communities are located in commercially unviable and marginal locations where it would not be possible to generate a CIL levy. The government has indicated that a 'meaningful' proportion should go to local communities. The government published (10 October 2011) a consultation paper inviting views amongst other things on a minimum level for "meaningful" but also suggesting a cap. Whilst the Government has not yet published its response to the consultation nor indicated when it will do so, it can be expected that the matter will be subject to formal regulation in due course. It is suggested that the Council will need to review its position in the light of future government regulations and that this will be most appropriately addressed as part of the development of the Leeds CIL scheme.

Whilst the government has still to publish regulations on this issue it should also be noted that work is progressing on the scale of the strategic funding gap. Executive Board will need to consider the appropriate rate at which to set CIL in the light of that gap and the viability evidence provided by the GVA study. The outcome will be subject to consultation and eventually examination. Further consideration of this issue would be more appropriate once the regulations are in place and the Council is further advanced with its CIL proposals.

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8	<p>That the Director of City Development submit, at an early stage in the process, a draft of the proposed Charging Tariff/Schedule for the CIL to the appropriate Scrutiny Board in accordance with the agreed CIL timetable so that it can be examined at inquiry.</p>		
	<p><u>November 2013 update</u> <i>As noted above, as the CIL Charging Schedule will be a document within the Local Development Framework, Sustainable Economy and Culture Scrutiny Board on the 17th September 2013 considered the Executive Board report (9th October) which outlined the Draft Charging Schedule. The notes of the Scrutiny meeting included that: "We asked for reassurance that the Executive Member and officers were comfortable with the proposed reductions in some of the CIL rates from the preliminary schedule, and that these were sufficiently robust to respond to potential improvements in the economy. Within the limitations of the CIL process being a completely new approach, we were assured that it was felt that the proposed rates could be defended at the public examination stage." Executive Board approved the CIL Draft Charging Schedule for public consultation from the 29th October to 10th December 2013, and for subsequent submission for examination. This is anticipated to be in Spring 2014.</i></p> <p><u>Formal Response (received November 2012)</u> <i>Prior to examination of the CIL charging schedule by an independent inspector, Executive Board will have opportunity to consider and "sign-off" proposals both for the "Preliminary Charging Schedule" which will be subject to public consultation and the subsequent Draft Charging Schedule which will be subject to consultation and examination. Members will be fully consulted on these proposals.</i></p>	<p>2 (achieved)</p>	

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	Recommendation	Stage	Complete
9 (i)	<p>That the Director of City Development and Director of Environment and Neighbourhoods press for a reduction in the Council’s housing target as a consequence of the revised population projection by the Office for National Statistics and report back to the appropriate Scrutiny Board on the outcome.</p>		
	<p><u>November 2013 update</u> <i>ONS recently published 2011 based Interim Household Projections which provide lower growth forecasts than the previous 2008 based Projections. Council officers presented this new evidence (as well as the 2013 update of the Regional Econometric Model forecasts for employment growth in Leeds) at the Core Strategy Examination in October 2013. The new evidence shows a range of trajectories of need for housing in Leeds. It illustrates that the Core Strategy housing requirement of 74,000 (gross) new dwellings 2012 – 2028 sits at the upper end of the range of trajectories. The Planning Inspector also heard evidence from resident groups that the housing needs are exaggerated and the Core Strategy requirement should be reduced to around 50,000 dwellings. He also heard evidence from house builders that the Core Strategy requirement failed to account for undersupply pre-2012 and should be increased to 90,000+. The Inspector’s conclusions and recommendations are awaited.</i></p> <p><u>Formal Response (received November 2012)</u> <i>In tandem with Scrutiny Board’s concern about the realism of population forecasts, Leeds has already set a reduced housing requirement which was lower than the 2008 ONS Population Forecasts. This was based on the Strategic Housing Market Assessment (SHMA) which identified a number of weaknesses in the ONS methodology. The recent ONS forecasts addressed these weaknesses. Leeds’ population forecasts which underpin its housing requirement are still lower than the recent ONS forecasts. ONS figures released in March 2012 using the revised methods suggest a 2026 population for Leeds of 885,000 people and we will have the benefit of census data later this year. It would perhaps be most useful therefore to consider this recommendation at this time.</i></p>	<p>4 Not achieved (Progress made acceptable. Continue monitoring.)</p>	

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	Recommendation	Stage	Complete
9 (ii)	<p>That the Director of City Development and Director of Environment and Neighbourhoods request an increase in the windfall figure for Leeds as a result of the publication of the National Planning Policy Framework.</p>		
	<p>November 2013 update <i>The Core Strategy's windfall allowance of 500 dwellings per annum was discussed at the Core Strategy Examination October 2013. Officers put the case that the allowance derived from trend based evidence is conservatively pitched and is justified for the entire plan period to 2028. House builders claim that the NPPF and NPPG (draft web based guidance) only allows local authorities to set a windfall allowance for the first 5 years of their plans. The Inspector's conclusions and recommendations are awaited.</i></p> <p><i>Formal Response (received November 2012)</i> <i>Leeds made strenuous representations to national government for a change to national planning policy on the acceptability of windfall allowances and this contributed to the changes set out below. According to the NPPF, Leeds City Council must be able to justify any windfall allowance in its Core Strategy which is subject to public examination. The NPPF states:</i></p> <p><i>"Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens."</i></p> <p><i>Whilst Leeds has a strong historic track record of windfall delivery it may be argued that this, at least in part, is due to its policy of greenfield restraint. The NPPF will help Leeds to sustain the case for a realistic allowance to be set in the Core Strategy</i></p>	<p>4 Not achieved (Progress made acceptable. Continue monitoring.)</p>	