

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 28th 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 3rd 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 8th 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 AVLAAP¹
 - 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

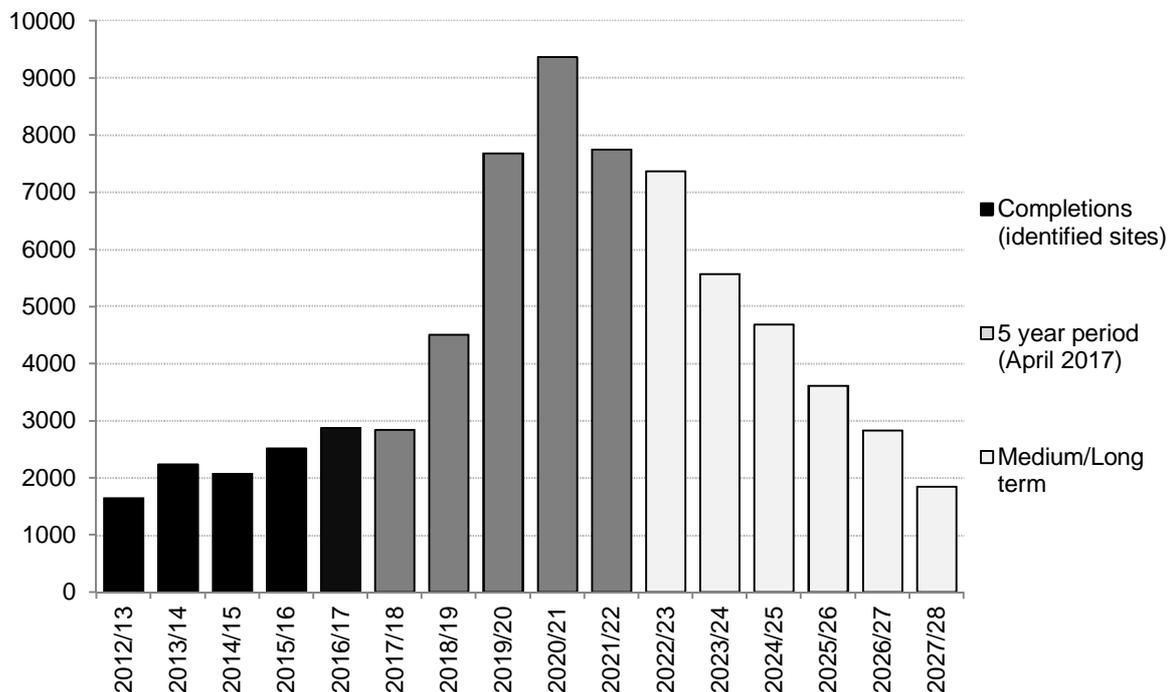
- 6.26. The SHLAA also notes the potential type and quantity of development that could be delivered on each site, including an estimate of build out rates, setting out how any barriers to delivery could be overcome and when.
- 6.27. The Leeds SHLAA is published as a list of all sites or broad locations 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

¹ 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).