

Report of Director of City Development

Report to Development Plan Panel

Date: 21st 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

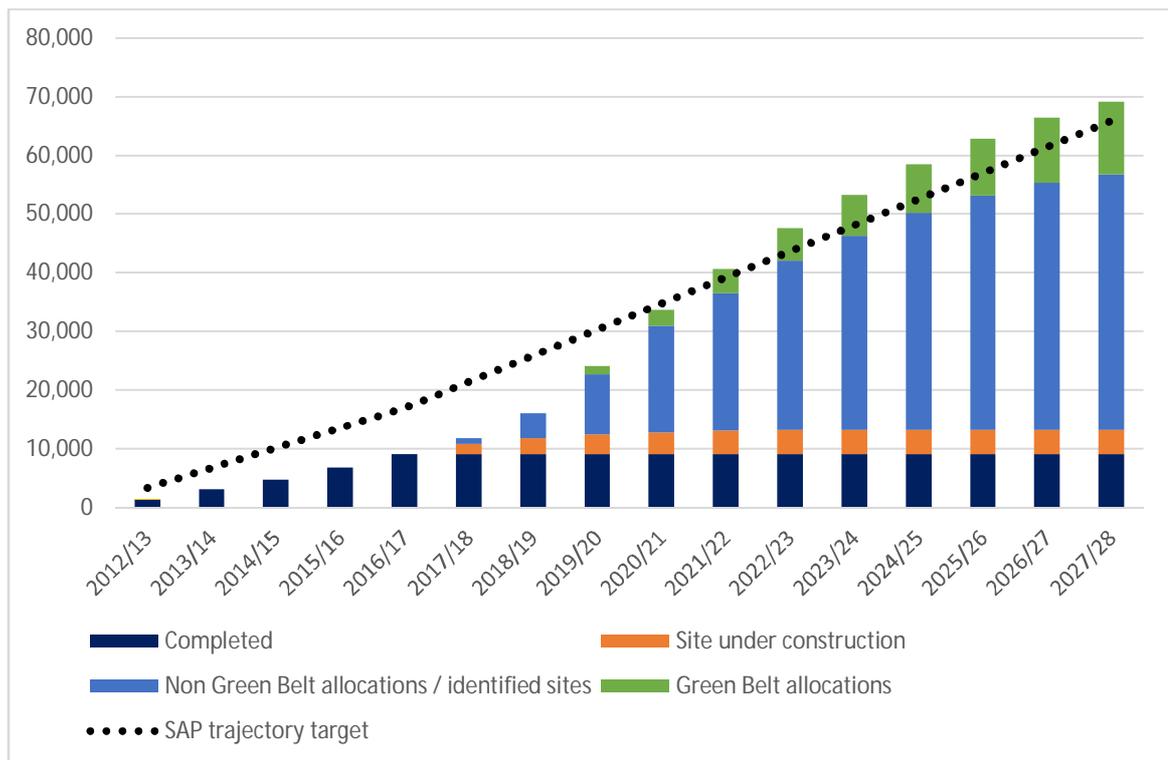
or economic development on sites of 0.25 hectares (or 500 square metres of floor space) and above. (Section 3 ¶10)'

- 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
Total	66,000	12,385	5,594	6,787

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.

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

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