

**Report of Director of City Development**

**Report to Executive Board**

**Date: 13 December 2017**

**Subject: Amendments to the Leeds Site Allocations Plan**

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. Leeds is recognised internationally and nationally, as a leading UK Core City and is a dynamic, economically successful and ambitious City at the heart of the City Region. The District is characterised by a vibrant City Centre, a main urban area and a distinctive pattern of major and other settlements, each with their own unique character and identity. In taking forward priorities for regeneration, growth, infrastructure, and environmental enhancement, the Development Plan for Leeds has a key role to play in shaping the future form, location and overall pattern of development, in the allocation of land for housing, employment, retail and green space. In helping to meet these requirements and in delivering longer term aspirations, it is crucial therefore that Leeds has an up to date Development Plan in place.
2. The Leeds Local Plan sets out a vision and a framework for the future development of the City. It comprises a number of separate documents at different stages of preparation: an Adopted Core Strategy (CS), Adopted Natural Resources and Waste Plan (NRWLP), the saved policies of the Unitary Development Plan (UDP), emerging Site Allocations Plan (SAP) and an Adopted Area Action Plan for the Aire Valley (AVLAAP).
3. 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 the views of individual local communities. It should be emphasised also that despite emerging changes to Government policy on planning, national guidance continues to advocate a plan-led system and the need for up to date plans to be in place as a priority.

4. In February 2017 Executive Board and Council agreed the submission of the SAP to the Secretary of State with the Examination commencing in May 2017, and Stage 1 hearing sessions taking place in October. Concurrent with this process, in February 2017, Executive Board also agreed the scope of a Core Strategy Selective Review (CSSR), as a focus to review the Adopted Core Strategy (2014) housing requirement, in light of a changing evidence base. Within the context of national planning guidance (National Planning Policy Framework), it is not possible to substitute one housing requirement figure for another, without a formal review and independent examination of the Core Strategy. This process is therefore taking place as part of the agreed CSSR, with the SAP being examined against the requirements already set out in the adopted Core Strategy. This was clarified by the Inspector in her initial guidance notes.
5. Following the submission of the SAP for independent examination, hearing sessions were initially planned to commence on 14<sup>th</sup> October. However, as a consequence of a Department of Communities & Local Government (DCLG) consultation (*'planning for the right homes in the right places'*) on 14<sup>th</sup> September, it has been necessary for the Council to take stock of these consultation proposals and for the Green Belt release of land through the SAP for housing development. This is because the DCLG proposals, without any prior notification to Leeds City Council or other local authorities, propose and apply a new very simplified methodology for calculating the housing requirement as part of the development plan. The new draft methodology, if progressed into planning policy, would result in housing figures of 42,384 homes over 16 years, compared to the 70,000 homes Core Strategy figure and lower than the range derived from the 2017 Strategic Housing Market Assessment (SHMA) (51,952 – 60,528 homes between 2017 and 2033).
6. As a consequence of the DCLG consultation proposals and the need for the Council to prepare a response to them and to undertake further technical work, through the SAP Programme Officer, the Council agreed with the SAP Inspectors to continue with the SAP Hearings in October (with a reduced programme of "stage 1" matters around Employment, Green space, Retail, Gypsies, Travellers and Travelling Showpeople). Within the context of maintaining the Plan at Examination, it was agreed that Housing and other matters should be paused and to be considered as part of "stage 2" Hearings to commence in the 2018. Under the prevailing circumstances, this is considered to be a pragmatic and practical solution to the City Council's commitment (and Government's requirements) for development plans to be in place as quickly as possible. This approach recognises the wider changing context arising from the DCLG proposals and maintains a plan-led approach to managing growth, consistent with national planning guidance and the consultation proposals. Withdrawal of the SAP at this advanced stage would leave the District vulnerable to poorly planned,

uncoordinated and speculative proposals for development (especially in greenfield and Green Belt locations), contrary to good planning practice, the SAP Infrastructure Delivery Plan and the ambitions of the Best Council Plan. There is also a fundamental need to maintain progress on the SAP through Examination, in order to avoid risk of intervention from the Secretary of State.

7. The revised approach focuses on the implications of the release of land from the Green Belt arising from a lower housing requirement (as contextually set out in the DCLG consultation). The approach significantly reduces the release of Green Belt land (55% of the total Submission SAP Green Belt release). In recognising the need to meet housing needs throughout the District, the tight Green Belt boundary and the lack of suitable alternative opportunities (especially brownfield land) in individual housing markets, there remains a need to release a much reduced stock of Green Belt land for housing immediately (45% of the total Submission SAP Green Belt release), with remaining sites being retained in the Green Belt as Broad Locations for Growth, "Broad Locations". Consequently, the proposed approach advocates Green Belt land for 5,931 homes continuing to be proposed for release through the SAP and land for 6,454 homes retaining its Green Belt designation, until such a time as the Government's changes to housing needs and the Council's advancing CSSR are finalised and future review of the SAP.
8. This approach would enable the Council to Adopt a Plan, which is in line with national guidance, sound against the Adopted Core Strategy and responsive to the needs of an inclusive and growing economy and ambitions to provide housing growth of the right quality, type, tenure and affordability in the right places. It would ensure that the City Council can demonstrate a 5 year housing land supply; a position which is necessary (NPPF, para. 47), so as to resist continued speculative development on inappropriate sites throughout Leeds.
9. This prudent and responsible approach to the SAP, whilst it remains at Examination, creates a necessary, but minimal, change to the previous programme (as a result of the need for further public consultation). Stage 2 hearing sessions considering housing and remaining matters are proposed to be held in July 2018. The maintenance of the plan-making process, as set out in this report, is positive. Plan adoption remains a priority for DCLG and it should be noted that some authorities in the City-Region have recently been informed that they will be potentially placed in special measures due to their failure to make good progress in plan-making.
10. This report sets out a revised approach to progressing the Leeds SAP as it relates to the release of housing allocations and safeguarded land from the Green Belt. The report sets out further technical work on Green Belt release and reduces the level of release immediately, with policies to enable future release for housing once future housing requirement and Government guidance have been clarified. The report contains appendices which set out changes to the Submission SAP and lists of housing allocations – some of which will not change and continue to be proposed as a release from the Green Belt (land for 5,931 homes) and others which are proposed to be identified instead as Broad Locations (land for 6,454 homes).

## Recommendations

11. Executive Board is invited to:
  - i. Note the update on further technical work on housing and Green Belt release and revised timetable for the hearing sessions of the SAP Examination;
  - ii. Recommend to Council that the Revised Submission Draft SAP be approved for the purposes of public consultation on changes as set out in **Appendix 1** concerning: (a) deleting some proposed housing allocations and safeguarded land, and proposing identifying these as Broad Locations, (b) a new policy on Broad Locations, (c) amending the phasing of proposed housing allocations to ensure that sufficient land is available to meet housing needs and (d) revisions to the sustainability appraisal of the SAP (**Appendix 4**), (e) consequential amendments to other parts of the Plan and (f) background material (and evidence) to support the proposed amendments;
  - iii. Recommend to Council that this revised material (in ii above) be subject to 6 weeks public consultation and then be submitted to the Secretary of State (subject to any amendments following public consultation) as a Revised Submission Draft Plan prior to Stage 2 of the SAP Examination pursuant to Section 20 of the Planning and Compulsory Purchase Act 2004 as amended, in line with the draft timetable set out in the report;
  - iv. Recommend to Council that delegated authority is granted to the Chief Planning Officer in consultation with the Executive Member to make further amendments to the revised Submission Draft in response to representations received during the consultation period that are considered to be required for the soundness of the Plan;
  - v. Recommend that Executive Board request that, as in the Submission of the Site Allocations Plan in May 2017, Council grant authority to the independent inspector appointed to hold the Public Examination, to make modifications to the Submission Draft Plan (as revised in (ii) above), pursuant to Section 20 (7C) of the Planning and Compulsory Purchase Act 2004 as amended;
  - vi. Delegate authority to the Chief Planning Officer, in consultation with the Executive Member, to (a) approve the detail of any further technical documents and supporting evidence required to be submitted alongside the revised Submission plan for consideration at Stage 2 of the hearings, (b) continue discussions with key parties and suggest to the Inspector any edits and consequential changes necessary to be made to the revised Submission Draft Plan following Council approval during the Examination and prepare and give evidence in support of the revised Submission Plan at Examination.

## 1 Purpose of this report

- 1.1 This report sets out an amended 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 submission draft SAP may result in Green Belt being released for housing which is found not to be ultimately required in the longer term.
- 1.2 This report sets out amendments to the Submission SAP for public consultation (**Appendix 1 and 2**) together with an updated timetable to the SAP Examination. This report follows on from reports to Development Plan Panel (DPP) on the 3rd and 21<sup>st</sup> November which set out the reasons for the revised approach, the methodology to be used and the changes now considered necessary to the SAP.

## 2 Background Information

### Leeds Local Plan Context

- 2.1 The Local Plan for Leeds is comprised of a number of separate but complementary documents. This report concerns the Site Allocations Plan (SAP), but as Members will be aware this is supported by the overarching planning framework of the Core Strategy.
- 2.2 The current Core Strategy was Adopted in November 2014 and this included a housing requirement of 70,000 (net) new homes between 2012 and 2028, of which 66,000 homes were to be identified as allocations. At the time population projections were in excess of 85,000 homes and the submission housing requirement was at the lower end of likely scenarios. Since the Core Strategy was examined by a Government Inspector population projections shifted and in reflecting the Council's commitment to review the Core Strategy within 3 years, in February 2017, Executive Board recommended that a Core Strategy Selective Review (CSSR) begin and this process has advanced, with initial consultation on scope and evidence base work being completed during the summer. Publication Draft policies are due to be considered by Executive Board in February 2018 for the purposes of further public consultation.
- 2.3 As part of the CSSR the Council commissioned further detailed evidence in early 2017 as part of a Strategic Housing Market Assessment (SHMA). The SHMA calculated a locally based requirement and applied the Government's emerging standardised methodology (as far as it was known at the time and as promoted by the Government appointed Local Plans Expert Group (LPEG)). The SHMA revealed a housing requirement between 51,952 – 60,528 homes between 2017 and 2033, with the LPEG methodology generating 55,000 homes. The SAP Inspectors were aware of the CSSR and wrote to the Council asking whether lower requirements would put at risk the approach to Green Belt release in the SAP. It was considered by the Council that the initial findings of the SHMA did not make the SAP inconsistent

with the CSSR (as previously noted by Executive Board in February 2017). The Inspectors were satisfied to examine the Plan as submitted with this more recent update being considered as contextual information.

- 2.4 Concurrent with Executive Board's decision, in February 2017, to progress a CSSR, Members also agreed that the SAP be submitted to the Secretary of State for independent examination (consequently endorsed by Full Council in April). At the February 2017 meeting it was made clear to Executive Board that whilst the direction of travel of the most up-to-date housing needs of the City were lower than in the Adopted Core Strategy (supported by initial evidence work on housing need) there were two key reasons to progress the SAP to Adoption when measured against the Adopted Core Strategy. First, so as to provide greater certainty over housing land supply and resist speculative housing proposals. Secondly, that the emerging evidence at the time was of a revised requirement which, whilst lower, would by means of a reset plan-period (2017 to 2033), be complementary to the land released in the SAP i.e. the same level of housing allocations could be delivered over a longer period of time.
- 2.5 It is important to note that whilst complementary, the plan-making processes for the SAP and the CSSR are separate processes. This approach reflects the LDF introduced in 2004 (now Local Plan Regulations), which enables local authorities to have greater flexibility in the plan-making process and for a city the scale and complexity of Leeds, enables plans to be more readily draw up and reviewed. To that end, within the context of national planning guidance, it is not possible to substitute the current housing requirement figure for another, without a formal review and independent examination of the Core Strategy. This formal review is taking place as part of the agreed CSSR, but it means that the SAP is being examined against the requirements already set out in the adopted Core Strategy. This position was understood and clarified by the Inspector in her initial guidance notes.
- 2.6 However, as a consequence of a Department of Communities & Local Government (DCLG) consultation (*'planning for the right homes in the right places'*) on 14th September, it has been necessary for the Council to take stock of these consultation proposals and for the Green Belt release of land through the SAP for housing development. This is because the DCLG proposals, without any prior notification to Leeds City Council or other local authorities, propose and apply a new very simplified methodology for calculating the housing requirement as part of the development plan. The new draft methodology would result in housing figures of 42,384 homes over 16 years, compared to the 70,000 homes Core Strategy figure and lower than the range derived from the 2017 Strategic Housing Market Assessment (SHMA) (51,952 – 60,528 homes between 2017 and 2033).
- 2.7 This report sets out how contextual regard is being given to proposed changes in National Guidance and subsequently the emerging policies of the CSSR. Within this overall context, once the SAP is Adopted, the City Council will have the opportunity to undertake a review of it in light of a revised housing requirement set in the CSSR (once Adopted).
- 2.8 Following the submission of the SAP for independent examination, hearing sessions were initially planned to commence on 14th October. As a consequence of the DCLG consultation proposals and the need for the Council to prepare a response to them and to undertake further technical work, through the SAP Programme Officer, the

Council agreed with the SAP Inspectors to continue with the SAP Hearings in October (with a reduced programme of “stage 1” matters around Employment, Green space, Retail, Gypsies, Travellers and Travelling Showpeople). Whilst maintaining the Plan at Examination, it was agreed that Housing and other matters should be paused and to be considered as part of “stage 2” Hearings to commence in the 2018. Under the prevailing circumstances, this is considered to be a pragmatic and practical solution to the City Council’s commitment (and Government’s requirements) for development plans to be in place as quickly as possible. This approach recognises the wider changing context arising from the DCLG proposals and maintains a plan-led approach to managing growth, consistent with national planning guidance and the consultation proposals. Withdrawal of the SAP at this advanced stage would leave the District vulnerable to poorly planned, uncoordinated and speculative proposals for development (especially in greenfield and Green Belt locations), contrary to good planning practice, the SAP Infrastructure Delivery Plan and the ambitions of the Best Council Plan.

- 2.9 The report to DPP on 3rd November highlighted the potential effect that the Government’s recent consultation on housing needs could have on the SAP. In order to ensure a prudent and responsible approach to the 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 and agreed, as the most preferable against alternatives, which included withdrawal of the Plan and progressing regardless.
- 2.10 The amount of housing land that the SAP needs to provide is the equivalent to 66,000 homes (as set out in the Adopted 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
- 2.11 On 12th 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. 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. 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 to just over 3,000 units. Incorporated within these figures are sites allocated in the Adopted Aire Valley Leeds Area Action Plan. This is a marginal buffer of 5% which may provide for flexibility and choice.

## Five Year Housing Land Supply

- 2.12 As set out in the Strategic Housing Land Availability (SHLAA) Report noted and agreed by Development Plan Panel on 21st November 2017 the Council is currently in a position of demonstrating a 4.38 year land supply against Adopted Core Strategy targets (of 4,700 homes per annum) with backlog against 2012 and a 20% buffer. It is integral to the approach to the SAP, as set out in this paper, and as illustrated in **Table 1** that upon Adoption a 5 year supply will be achieved. It is also important to note that the contextual downward trajectory of housing requirement in the DCLG consultation and the advancing Core Strategy Selective Review both provide for a 5 year supply of up to 11 years.

### **3 Main issues**

- 3.1 The SAP needs to be amended so as to ensure that it remains sound whilst having contextual regard to the likely downward trajectory of housing need requirements particularly with regard to Green Belt release. The means to do this is set out below and involves considering the minimum level of Green Belt required for the SAP to be a sound plan and a basis to meet the five year housing land supply requirements as part of the NPPF.
- 3.2 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.
- 3.3 The Council has considered the means by which the SAP may be advanced through Examination (as set out in paragraph 2.4 above) whilst ensuring that its Adoption does not release Green Belt for housing that may not be needed following a review of the housing requirement. The means to do this is via flexibility when identifying and assessing potentially suitable housing land. As noted in paragraph 2.10 above the submission draft SAP categorises two sorts of specific site allocation to meet the Core Strategy needs of 66,000 homes i.e. “identified” and “allocated” sites. The Council now proposes to identify a third category of site, namely “Broad Locations”.
- 3.4 The identification of broad locations is considered to form a reasonable option for progressing the SAP in order to meet identified development requirements (as set



out in the Core Strategy) whilst also having regard to the future trajectory of housing growth signalled by the CLG housing needs consultation. Sites identified as Broad Locations will form a pool of sites which will remain within the Green Belt as identified locations for growth in the latter part of the plan-period. 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 during the plan-period 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

- 3.5 A “Broad Location” is intended to allow local authorities the capability of applying flexibility when identifying and assessing potentially suitable housing land without specifically identifying and allocating such land. The NPPF supports this approach and states in ¶47:

*‘To boost significantly the supply of housing, local planning authorities should:…  
- identify a supply of specific, developable sites or broad locations for growth,  
for years 6-10 and, where possible, for years 11-15…’ (my emphasis added)*

- 3.6 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. However, 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.
- 3.7 Some Development Plan Panel Members have expressed concern about the specificity of the Broad Locations proposed. There is nothing in the NPPF, NPPG or case law to support the suggestion that a Broad Location cannot mirror spatially a formerly proposed allocated site. 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 Government guidance, which refers to sites and Broad Locations in an interchangeable manner and specifically notes that “*all sites and Broad Locations capable of delivering 5 or more dwellings*” can be assessed for purposes of identifying housing land supply. (National Planning Practice Guidance (NPPG), Section 3, paragraph 10).

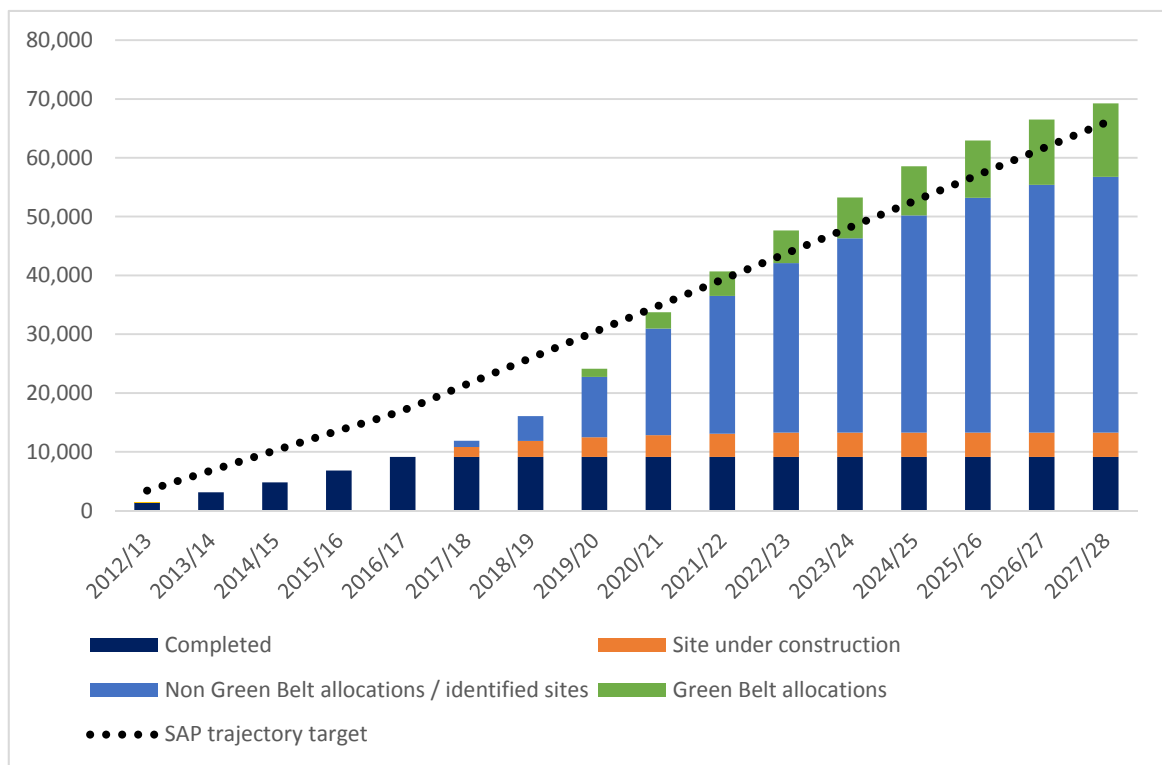
### The Site Allocations Plan Housing Trajectory

- 3.8 Within the overall context of its allocations and Broad Locations, there is a need to understand how much Green Belt land needs to be released for the Plan to be sound (in meeting land supply requirements). This can be determined by looking at the SAP housing trajectory and ensuring that it complies with national guidance.
- 3.9 National guidance (NPPF paragraph 47) requires that specific sites are identified for years 1 to 5 of a plan with Broad Locations considered identified 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 trajectory. Whilst the NPPF only requires specific allocated sites for years 1 to 5 (2012/23 to 2016/17) and allows Broad Locations thereafter, it equally requires a plan to ensure a five year housing land supply upon Adoption (i.e. 2018/19 to 2022/23). In light of this the City Council needs to identify specific housing allocations on Adoption of the SAP so as to maintain a five year housing land supply i.e. up to 2022/23. Beyond this time (i.e. 2023/24 to 2027/28) the Council considers that Broad Locations in line with the NPPF can be identified.

- 3.10 **Figure 1** below sets out a 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 homes, 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)
- 3.11 The trajectory includes the recent PAS sites allowed on appeal (as set out at paragraph 2.11 above) as counting towards the overall housing land supply. A key thrust of this approach is also to identify those non-Green Belt sources of supply that are able to come forward sooner, but might have previously been phased later, so as to relieve pressure on Green Belt releases. To that end, some sites originally phased in later phases of the Plan are now proposed to be brought forward to Phase 1 to secure a larger pool of suitable non-Green Belt sites.
- 3.12 This trajectory shows that in line with the delivery assumptions in the Strategic Housing Land Availability Assessment (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 5,598 homes required from Green Belt land, so as to support the trajectory.
- 3.13 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)**



3.14 Understanding that 5,598 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 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 (i.e. those required for supply post 2022/23) will be designated as Broad Locations i.e. land for 6,787 homes.

Contribution to the housing trajectory by individual HMCAs

3.15 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 and for compliance with the spatial approach set out in the adopted Core Strategy. 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.

3.16 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 5,598 homes that are needed from Green Belt and thus in total help support the maintenance of the SAPs housing trajectory. 5,598 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. It should be noted that sites allowed on appeal within individual HMCAs have been included in the derivation of the overall level of Green Belt land release required to maintain the Plans trajectory (see paragraph 3.11 above). It is not an expectation of the Plan that all HMCAs will deliver at the same rate, because of their local market activity or portfolio of sites. This therefore means that individual HMCAs do not have individual housing trajectories as in **Figure 1. Table 1** therefore reflects amendments to the Green Belt per HMCA on a proportionate basis, as agreed by the Council in the Submission SAP.

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

HMCA	Target	Submission Plan Green Belt release	Green Belt housing allocations to remain as housing allocations *			Green Belt housing allocations to be deleted as housing allocations and identified as Broad Locations *		
			Target of 45.2%	Following technical consideration	Performance against 45.2% target	Target of 54.8%	Following technical consideration	Performance against 54.8% target
<b>Aireborough</b>	2,300	972	439	475	36	533	497	-36
<b>City Centre</b>	10,200	0	0	0	0	0	0	0
<b>East</b>	11,400	245	111	245	134	134	0	-134
<b>Inner</b>	10,000	0	0	0	0	0	0	0
<b>North</b>	6,000	1,365	617	558	-59	748	807	59
<b>Outer North East</b>	5,000	1,974	892	892	0	1,082	1,082	0
<b>Outer North West</b>	2,000	152	69	87	18	83	65	-18
<b>Outer South</b>	2,600	1,634	739	758	19	895	876	-19
<b>Outer South East</b>	4,600	2,595	1,173	1,173	0	1,422	1,422	0
<b>Outer South West</b>	7,200	2,456	1,110	1,119	9	1,346	1,337	-9
<b>Outer West</b>	4,700	992	448	624	176	544	368	-176
<b>Total</b>	<b>66,000</b>	<b>12,385</b>	<b>5,598</b>	<b>5,931</b>	<b>333</b>	<b>6,787</b>	<b>6,454</b>	<b>-333</b>

\* Individual sites, which comprise the HMCA totals, are listed in Table 2 below

3.17 As **Table 1** above shows, by taking this approach, the City Council is proposing to not to release land from the Green Belt for 6,454 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

3.18 The methodology for this work 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.

3.19 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

3.20 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

- 3.21 The outcomes of these site assessments and further consequential amendments for consultation are summarised in the **Table 2** below.

**Table 2 – Former Green Belt Allocations and their proposed amendments**

<b>HMCA</b>	<b>Site Ref.</b>	<b>Ward</b>	<b>Address</b>	<b>Homes</b>	<b>Phase</b>	<b>Proposed Amendments</b>
<b>Aireborough (475 homes)</b>	HG2-01	Guiseley & Rawdon	New Birks Farm, Ings Lane, Guiseley	160	2	Retain housing allocation. Change to Phase 1.
	HG2-02	Guiseley & Rawdon	Wills Gill, Guiseley	133	2	Retain housing allocation. Change to Phase 1.
	HG2-04	Guiseley & Rawdon	Hollins Hill and Hawkstone Avenue, Guiseley	80	2	Retain housing allocation. Change to Phase 1.
	HG2-09	Otley & Yeadon	Land at Victoria Avenue, Leeds	102	2	Retain housing allocation. Change to Phase 1.
<b>East (245 homes)</b>	HG2-119	Cross Gates and Whinmoor	Red Hall Playing Offices & Playing Field	50	1	Retain housing allocation.
	HG2-123	Temple Newsam	Colton Road East	14	2	Retain housing allocation. Change to Phase 1.
	HG2-174	Rothwell	Wood Lane – Rothwell Garden Centre	31	2	Retain housing allocation. Change to Phase 1.
	MX2-38	Temple Newsam	Barrowby Lane, Manston	150	2	Retain housing allocation. Change to Phase 1.
<b>North (558 homes)</b>	HG2-36	Alwoodley	Alwoodley Lane, Alwoodley, LS17	285	2	Retain housing allocation. Change to Phase 1.
	HG2-38	Temple Newsam	Dunstarn Lane (land south), Adel LS16	68	2	Retain housing allocation. Change to Phase 1.
	HG2-42	Horsforth	Broadway and Calverley Lane, Horsforth	18	2	Retain housing allocation. Change to Phase 1.
	HG2-43	Horsforth	Horsforth Campus	134	2	Retain housing allocation. Change to Phase 1.
	HG2-46	Horsforth	Horsforth (former waste water treatment work)	53	1	Retain housing allocation.
<b>Outer North East (892 homes)</b>	HG2-26	Harewood	Scarcroft Lodge	100	1	Retain housing allocation.
	MX2-39a	Harewood	Land at Parlington	792	1	Retain housing allocation on revised boundary with revised capacity
<b>Outer North West</b>	HG2-17	Adel and Wharfedale	Breary Lane East, Bramhope	87	3	Retain housing allocation. Change to Phase 1.



HMCA	Site Ref.	Ward	Address	Homes	Phase	Proposed Amendments
<b>(87 homes)</b>						
<b>Outer South (758 homes)</b>	HG2-174	Rothwell	Wood Lane – Rothwell Garden Centre LS26	52	2	Retain housing allocation. Change to Phase 1.
	HG2-175	Rothwell	Bullough Lane – Haigh Farm (land adjacent to)	222	2	Retain housing allocation. Change to Phase 1.
	HG2-177	Rothwell	Alma Villas (site at), Woodlesford LS26 8PW	12	1	Retain housing allocation.
	HG2-179	Rothwell	Fleet Lane/Eshald Lane (land at), Oulton LS26 8HT	40	2	Retain housing allocation. Change to Phase 1.
	HG2-180	Rothwell	Land between Fleet Lane and Methley Lane, Oulton	322	2	Retain housing allocation. Change to Phase 1.
	HG2-183	Rothwell	Swithens Lane, Rothwell	85	2	Retain housing allocation. Change to Phase 1.
	HG2-186	Kippax and Methley	Main Street, Hunts Farm, Methley	25	3	Retain housing allocation. Change to Phase 1.
<b>Outer South East (1,173 homes)</b>	HG2-124a	Garforth and Swillington	Stourton Grange Farm South, Selby Road, Garforth	1090	1	Retain housing allocation on revised boundary with revised capacity
	HG2-126	Kippax and Methley	Micklefield Railway Station Car Park (land to north)	18	3	Retain housing allocation. Change to Phase 1.
	HG2-133	Kippax and Methley	Ninevah Lane, Allerton Bywater	65	3	Retain housing allocation. Change to Phase 1.
<b>Outer South West (1,119 homes)</b>	HG2-136	Farnley and Wortley	Whitehall Road (south of) - Harpers Farm	279	2	Retain housing allocation. Change to Phase 1.
	HG2-145	Morley North	Land north west of Birchfield Primary School, Gildersome	0	n/a	Retain allocation for school use only as HG5-9.
	HG2-150	Morley North	Churwell (land to the east of)	205	2	Retain housing allocation. Change to Phase 1.
	HG2-153	Morley South	Albert Drive Morley	121	1	Retain housing allocation.
	HG2-159	Ardsley and Robin Hood	Sissons Farm, Middleton LS10	222	1	Retain housing allocation.
	HG2-165	Ardsley and Robin Hood	Thorpe Hill Farm, Lingwell Gate Lane, Thorpe	57	1	Retain housing allocation.

HMCA	Site Ref.	Ward	Address	Homes	Phase	Proposed Amendments
	HG2-166	Ardsley and Robin Hood	Long Thorpe Lane (land off), Thorpe, Wakefield	17	1	Retain housing allocation.
	HG2-167a	Ardsley and Robin Hood	Old Thorpe Lane (land at), Tingley	207	3	Retain housing allocation. Change to Phase 1.
	HG2-233	Ardsley and Robin Hood	Land at Moor Knoll Lane East Ardsley	11	3	Retain housing allocation. Change to Phase 1.
<b>Outer West (624 homes)</b>	HG2-53	Calverley and Farsley	Calverley Cutting / Leeds Liverpool Canal, Apperley	32	1	Retain housing allocation.
	HG2-63	Calverley and Farsley	Woodhall Road (land adjoining) - Gain Lane	196	1	Retain housing allocation.
	HG2-65	Calverley and Farsley	Daleside Road, Thornbury,	89	1	Retain housing allocation.
	HG2-68	Pudsey	Waterloo Road (land at), Pudsey LS28	28	1	Retain housing allocation.
	HG2-69	Calverley and Farsley	Dick Lane, Thornbury	206	1	Retain housing allocation.
	HG2-71	Pudsey	Land off Tyersal Road, Pudsey	33	1	Retain housing allocation.
	HG2-72	Pudsey	Land off Tyersal Court, Tyersal	40	1	Retain housing allocation.
			<b>TOTAL RETAINED HOUSING ALLOCATIONS</b>	<b>5,931</b>		
<b>Aireborough (497 homes)</b>	HG2-03	Guiseley & Rawdon / Otley & Yeadon	Shaw Lane (land at), Guiseley and Banksfield Mt	234	2	Delete housing allocation and identify as Broad Location
	HG2-05	Guiseley & Rawdon	Land at Coach Road, Guiseley	83	2	Delete housing allocation and identify as Broad Location
	HG2-10	Guiseley & Rawdon	Gill Lane, Yeadon	155	2	Delete housing allocation and identify as Broad Location
	HG2-12	Horsforth	Woodlands Drive, Rawdon	25	2	Delete housing allocation and identify as Broad Location
<b>North (807 homes)</b>	HG2-41	Horsforth	South of A65 (Strawberry Fields)	777	1	Delete housing allocation and identify as Broad Location
	HG2-49	Weetwood	Off Weetwood Avenue, Headingley, Leeds	30	2	Delete housing allocation and identify as Broad Location
<b>Outer North East (1.082 homes)</b>	HG2-24	Harewood	Former Sacrament Church, Keswick Lane, Bardsey	10	3	Delete housing allocation and identify as Broad Location

HMCA	Site Ref.	Ward	Address	Homes	Phase	Proposed Amendments
	HG2-25	Wetherby	Farfield House, Bramham	14	3	Delete housing allocation and identify as Broad Location
	MX2-39b	Harewood	Part of Land at Parlinton	1058	1	Delete housing allocation and identify as Broad Location
<b>Outer North West (65 homes)</b>	HG2-15	Adel and Wharfedale	Green Acres and Equestrian Centre, Bramhope	42	3	Delete housing allocation and identify as Broad Location
	HG2-16	Adel and Wharfedale	Creskeld Lane, Bramhope – land to rear of no.45	23	3	Delete housing allocation and identify as Broad Location
<b>Outer South (876 homes)</b>	HG2-173	Rothwell	Haighside, Rothwell	578	2	Delete housing allocation and identify as Broad Location
	HG2-181	Ardsley & Robin Hood	Land at Leadwell Lane, Robin Hood	60	3	Delete housing allocation and identify as Broad Location
	HG2-184	Ardsley and Robin Hood	Westgate Lane, Lofthouse	50	3	Delete housing allocation and identify as Broad Location
	HG2-185	Ardsley and Robin Hood	Church Farm, Lofthouse	188	3	Delete housing allocation and identify as Broad Location
	HG5-7	Ardsley and Robin Hood	Hope Farm (school provision)	0	-	Delete school allocation and identify as Broad Location
<b>Outer South East (1,422 homes)</b>	HG2-124b	Garforth and Swillington	Part of Stourton Grange Farm South, Selby Road	1224	1	Delete housing allocation and identify as Broad Location
	HG2-127	Kippax and Methley	Newtown Farm, Micklefield	42	3	Delete housing allocation and identify as Broad Location
	HG2-128	Kippax and Methley	Selby Road/Leeds Road, Kippax	40	3	Delete housing allocation and identify as Broad Location
	HG2-131	Garforth and Swillington	Whitehouse Lane, Great Preston	40	3	Delete housing allocation and identify as Broad Location
	HG2-132	Kippax and Methley	Brigshaw Lane (land to east of), Kippax	76	3	Delete housing allocation and identify as Broad Location
<b>Outer South West (1,337 homes)</b>	HG2-144	Morley North	Westfield Farm, Drighlington	17	3	Delete housing allocation and identify as Broad Location
	HG2-145	Morley North	Bradford Road/Wakefield Road Gildersome	393	3	Delete housing allocation and identify as Broad Location
	HG2-147	Morley North	Highfield Drive/Harthill Lane (land off), Gildersome	76	3	Delete housing allocation and identify as Broad Location

HMCA	Site Ref.	Ward	Address	Homes	Phase	Proposed Amendments
	HG2-148	Morley North	Gelderd Road/M621, Gildersome	203	3	Delete housing allocation and identify as Broad Location
	HG2-167b	Ardsley and Robin Hood	Part of Old Thorpe Lane (land at), Tingley	412	3	Delete housing allocation and identify as Broad Location
	HG2-170	Ardsley and Robin Hood	Land off Haigh Moor Road, Tingley	41	3	Delete housing allocation and identify as Broad Location
	HG2-171	Ardsley and Robin Hood	Westerton Road East Ardsley	195	3	Delete housing allocation and identify as Broad Location
<b>Outer West (368 homes)</b>	HG2-54	Calverley and Farsley	Upper Carr Lane (land off), Calverley	18	3	Delete housing allocation and identify as Broad Location
	HG2-55	Calverley and Farsley	Calverley Lane, Calverley	18	3	Delete housing allocation and identify as Broad Location
	HG2-56	Calverley and Farsley	Rodley Lane (land at) - Calverley Lane	53	2	Delete housing allocation and identify as Broad Location
	HG2-59	Bramley and Stanningley	Land at Rodley Lane	17	2	Delete housing allocation and identify as Broad Location
	HG2-76	Pudsey	Hough Side Road Pudsey	200	1	Delete housing allocation and identify as Broad Location
	HG2-80	Pudsey	Acres Hall Avenue Pudsey	62	1	Delete housing allocation and identify as Broad Location
<b>TOTAL PEVIOUS HOUSING ALLOCATIONS NOW PROPOSED AS BROAD LOCATIONS</b>				<b>6,454</b>		
<b>Aireborough (360 homes)</b>	HG3-1	Guiseley and Rawdon	Ings Lane, Guiseley	114	-	Delete safeguarded land designation and identify as Broad Location
	HG3-2	Horsforth	Land to west of Knott Lane, Rawdon	81	-	
	HG3-3	Horsforth	Land at Rawdon, Leeds	35	-	
	HG3-4	Horsforth	Layton Wood Rawdon	130	-	
<b>Outer North West (280 homes)</b>	HG3-5	Adel and Wharfedale	Old Pool Bank, Pool in Wharfedale, Otley	280	-	Delete safeguarded land designation and identify as Broad Location
<b>Outer South (105 homes)</b>	HG3-27	Kippax and Methley	Church Lane (land south of), Mickletown	55	-	Delete safeguarded land designation and identify as Broad Location
	HG3-28	Kippax and Methley	Pinfold Lane (land west of), Mickletown	50	-	

<b>HMCA</b>	<b>Site Ref.</b>	<b>Ward</b>	<b>Address</b>	<b>Homes</b>	<b>Phase</b>	<b>Proposed Amendments</b>
<b>Outer South West (315 homes)</b>	HG3-21	Farnley and Wortley	Gelderd Road (land to the north of), Wortley	315	-	Delete safeguarded land designation and identify as Broad Location
<b>Outer West (220 homes)</b>	HG3-16	Farnley and Wortley	Land off Gamble Lane	120	-	Delete safeguarded land designation and identify as Broad Location
	HG3-29	Farnley and Wortley	Land off Gamble Lane	200	-	
<b>TOTAL PREVIOUS SAFEGUARDED LAND NOW PROPOSED AS BROAD LOCATIONS</b>				<b>1,380</b>		

3.22 The previously allocated housing sites in **Table 2** above are set out in **Appendix 3** alongside their technical assessment against the methodology in 3.18 to 3.20 above. It should be noted that the table also contains two sites related to school provision. HG5-9, Land North West of Birchfield Primary School, Gildersome is proposed to remain as a Green Belt release specifically for school provision / expansion to meet local needs. The housing allocation, with which it was originally associated, is proposed to be identified as a Broad Location. HG5-7, Hope Farm is proposed to be identified as a Broad Location, as it will potentially only be needed to meet longer term school needs, depending on the level of housing provision considered through a future review of the Plan.

### Phasing

3.23 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 draft Plan (these are shown in **Appendix 1** and **2**).

3.24 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 and is considered sound. 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.

### Safeguarded Land

3.25 The Council also needs to have regard to paragraph 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 5,383 homes)
- the designation of new Safeguarded Land from the Green Belt (equivalent to 1,380 homes)

3.26 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.

- 3.27 To that end, the amount of land to be designated as Broad Locations will include land for 1,380 homes (or equivalent employment) previously designated for safeguarded land. In sum land for 7,834 homes is proposed to be returned to the Green Belt as Broad Locations. This comprises land for 6,454 homes from previous housing allocations and land for beyond the current plan period for potentially up to 1,380 homes on previous safeguarded land.

Legal and procedural implications

- 3.28 Continuous engagement with prescribed bodies is underway to consider any wider implications of proposed amendments. This will include considerations on:
- Duty to Cooperate “strategic matters”
  - Implications on the strategic highways network
  - Implications for appropriate assessment screening (Habitats regulations)

Next Steps

- 3.29 Executive Board are asked to recommend that Council approve the amendments as a Revised Submission Draft Plan and approve public consultation on the amendments set out **Appendix 1** (and illustrated at **Appendix 2**). Following Council approval the amendments will be subject of 6 weeks public consultation. The approach outlined above will generate a need to reconsider the background material that the Council has relied on for its Submission SAP. A new standalone background paper will be produced to support the consultation and will comprise material in the report above, alongside the site assessments at **Appendix 3**.
- 3.30 The Council will have regard to the representations received following consultation and prior to re-submission of the Revised Submission draft Plan to the Secretary of State. Any changes required prior to submission, in response to representations received will be agreed by the Chief Planning Officer and Executive Member. Executive Board are therefore asked to recommend that Council delegate responsibility for any such changes prior to submission to the Secretary of State.
- 3.31 The consultation and subsequent submission of the Revised Submission draft Plan will be in line with the indicative timetable set out below.

<b>Milestone</b>	<b>Date</b>	<b>Notes</b>
Executive Board	13 <sup>th</sup> December 2017	<ul style="list-style-type: none"> <li>• Recommend changes for consultation to Council</li> </ul>
Full Council	10 <sup>th</sup> January 2018	<ul style="list-style-type: none"> <li>• Approve Revised Submission draft Plan for submission to Secretary of State subject to public consultation and necessary amendments</li> </ul>
Public Consultation	22 <sup>nd</sup> January to 2 <sup>nd</sup> March 2018	<ul style="list-style-type: none"> <li>• Public Consultation</li> </ul>
Revised Submission Draft Plan submitted to SAP Inspector	March 2018	<ul style="list-style-type: none"> <li>• Representation responses will be sent in full and in summary format</li> </ul>

Inspectors preparation for Stage 2 hearing sessions	April to June 2018	<ul style="list-style-type: none"> <li>• Inspectors will issue:</li> <li>• Revised Matters and Issues</li> <li>• Revised Guidance Note</li> <li>• Revised Agenda</li> </ul>
Hearing Sessions Stage 2	July 2018	<ul style="list-style-type: none"> <li>• In line with Inspector's and Programme Officers availability</li> </ul>

### Core Strategy Selective Review Timetable

- 3.32 For information it should be noted that the CSSR is progressing in line with the timetable agreed by Executive Board in February 2017. This will see draft Publication version policies subject of consultation in March 2018 (with the consideration of Executive Board in February). Whilst the CSSR is a separate plan process, its outcome is considered to be complementary to the SAP, pending formal consideration by Members of Executive Board.

## **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 3.31). Prior to and as part of this, the City Council will continue to engage with Duty to Cooperate and Prescribed Bodies, in reflecting legal requirements and national guidance.

### **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. This material has been made available to the SAP Inspectors as part of the submission material.

### **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 progressing 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 revised 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 SAP follows the statutory Development Plan process for Local Plans. The preparation of the Development Plan Document (and the proposed amendments to it) are in accordance and compliance with the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Plans) Regulations 2012 (as amended) As a Development Plan Document the SAP forms part of the Council's Budget and Policy Framework. Within this decisions arising from this report are not eligible for Call In. Within the context of this however, it should be emphasised that prior to the formal submission of the SAP, the Plan was subject to consideration by Scrutiny Board. In addition, in overseeing the preparation of the Local Plan for Leeds, the Development Plan Panel (through both formal meetings and workshop sessions) has performed a key role in scoping and shaping the content of the Plan, including these revised submission draft SAP proposals.

#### **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. There is a greater risk to the Council in withdrawing the SAP at this very advanced stage.

### **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 to defer releasing land from the Green Belt for 6,454 homes, which are required for later in the plan-period. 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
  - Deletion of “housing allocations” and identifying sites as “Broad Locations” remaining in the Green Belt
  - Deletion of “safeguarded land” and identifying sites as “Broad Locations” remaining in the Green Belt
- 5.4 Sites within Broad Locations will form a pool of sites which will remain in the Green Belt, as identified locations for growth in the latter part of the plan-period. 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 during the plan-period 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.
- 5.5 In summary, amendments to the Submission of the Site Allocations Plan are recommended so that land for 7,834 homes (across 43 sites) will remain in the Green Belt as Broad Locations. This comprises land for 6,454 homes, previously identified as 33 individual proposed housing allocations and land for up to 1,380 homes previously identified as 10 individual proposed safeguarded sites for development beyond 2028. These 43 sites will remain in Green Belt with the full weight of national and local Green Belt protection. In due course, once the Core Strategy Selective Review sets a revised housing requirement the need or otherwise for Broad Locations to be released from the Green Belt can be considered through a future review of the Site Allocations Plan. This revised approach is considered necessary to ensure continued good progress on plan-making, to provide a strategy for housing to meet local needs for homes across the City, to ensure that the Council has a defensible five year land supply upon Adoption of the Site Allocations Plan and to provide a responsible and prudent response to the Government’s recent consultation on housing needs.

## 6 Recommendations

### 6.1 Executive Board is invited to:

- i. Note the update on further technical work on housing and Green Belt release and revised timetable for the hearing sessions of the SAP Examination;
- ii. Recommend to Council that the Revised Submission Draft SAP be approved for the purposes of public consultation on changes as set out in **Appendix 1** concerning: (a) deleting some proposed housing allocations and safeguarded land, and proposing identifying these as Broad Locations, (b) a new policy on Broad Locations, (c) amending the phasing of proposed housing allocations to ensure that sufficient land is available to meet housing needs and (d) revisions to the sustainability appraisal of the SAP (**Appendix 4**), (e) consequential amendments to other parts of the Plan and (f) background material (and evidence) to support the proposed amendments;
- iii. Recommend to Council that this revised material (in ii above) be subject to 6 weeks public consultation and then be submitted to the Secretary of State (subject to any amendments following public consultation) as a Revised Submission Draft Plan prior to Stage 2 of the SAP Examination pursuant to Section 20 of the Planning and Compulsory Purchase Act 2004 as amended, in line with the draft timetable set out in the report;
- iv. Recommend to Council that delegated authority is granted to the Chief Planning Officer in consultation with the Executive Member to make further amendments to the revised Submission Draft in response to representations received during the consultation period that are considered to be required for the soundness of the Plan;
- v. Recommend that Executive Board request that, as in the Submission of the Site Allocations Plan in May 2017, Council grant authority to the independent inspector appointed to hold the Public Examination, to make modifications to the Submission Draft Plan (as revised in (ii) above), pursuant to Section 20 (7C) of the Planning and Compulsory Purchase Act 2004 as amended;
- vi. Delegate authority to the Chief Planning Officer, in consultation with the Executive Member, to (a) approve the detail of any further technical documents and supporting evidence required to be submitted alongside the revised Submission plan for consideration at Stage 2 of the hearings, (b) continue discussions with key parties and suggest to the Inspector any edits and consequential changes necessary to be made to the revised Submission Draft Plan following Council approval during the Examination and prepare and give evidence in support of the revised Submission Plan at Examination.

## **7 Appendices**

- Appendix 1 Table of proposed amendments to the Submission Site Allocations Plan and map changes arising
- Appendix 2 Illustrative “tracked change” version of relevant extracts from the Submission Site Allocations Plan showing proposed amendments
- Appendix 3 List of sites subject to proposed amendments with background technical reasons for amendments and HMCA summaries
- Appendix 4 Draft Sustainability Appraisal addendum report

## **8 Background documents<sup>1</sup>**

- 8.1 None.

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<sup>1</sup> The background documents listed in this section are available to download from the Council's website, unless they contain confidential or exempt information. The list of background documents does not include published works.