

Strategic Housing Land Availability Assessment

2018 Update

Main Report

1. Background

- 1.1. The preparation of a Strategic Housing Land Availability Assessment (SHLAA) is a requirement of the National Planning Policy Framework (NPPF) as revised in July 2018. Guidance on preparing SHLAA documents is contained in both the NPPF and the National Planning Policy Guidance (NPPG) for housing and economic land availability assessments published in September 2018. This SHLAA Update accords with both the revised NPPF and the NPPG.
- 1.2. The SHLAA is an ongoing technical process to inform planning policy development and implementation. It assists in the monitoring of whether there is an adequate supply of deliverable housing land at any point in time.
- 1.3. The previous Leeds SHLAA worked to a base date of 1 April 2017. This SHLAA Update works to a base date of 1 April 2018. The NPPG provides information to help local authorities fulfil their responsibilities under paragraph 67 of the NPPF. As well as establishing a five-year supply position to support the preparation and examination of Local Plans, the NPPG confirms that the supply position should be updated annually.
- 1.4. Preparation of a SHLAA for Leeds commenced in 2008 with the setting up of a partnership of external housing interests, agreement of a methodology and assessment of over 700 sites. The exercise completed in 2009 and the final reports were published early 2010. The SHLAA has been updated annually to adjust the delivery prospects of sites against updated information and to consider new sites. The SHLAA Update 2011 was published in December 2011, the 2012 Update in April 2013, the 2014 Update in July 2014 and the 2015 Update in January 2016.
- 1.5. A Draft 2016 SHLAA was prepared but not published as the Council awaited key Secretary of State recovered appeal decisions which were considered necessary to clarify the Council's approach. Following the Secretary of State's (and appeal Inspector's) conclusions in December 2016 a revised approach addressed a need for an enhanced and more detailed assessment that reflected the up-to-date interpretation of NPPG assessment of deliverability. A 2017 Update was subsequently published in November 2017 following consultation with the Home Builders Federation (HBF).
- 1.6. The SHLAA has been subject to examination at recent public inquiries at Thorp Arch Trading Estate, Wetherby (closed, November 2017) and subsequently updated at Tingley Station (up to 770 dwellings at land at Dunningley Lane) (closed, January 2018). Both inquiries considered the five year supply position as sourced from the 2017 Update. The Secretary of States conclusion notes the confidence in the Council's *"...thorough and proactive approach to land availability"*.

2. The SHLAA Partnership and stakeholder engagement

- 2.1. National practice guidance advocates that local planning authorities work together with key stakeholders, in particular house builders and local property agents; so that they can help shape the approach to be taken to help inform the deliverability and developability of sites, and how market conditions may affect economic viability. In line with the guidance the Council has established a consultation procedures with the HBF, the SHLAA Partnership, landowners, agents and applicants of planning applications,
- 2.2. In previous years the Council has assembled a SHLAA Partnership to steer and oversee the technical work on individual sites. The partnership comprises officers, members, the HBF, housebuilders (including SMEs and volume builders, both delivering in a variety of markets throughout Leeds), interested parties and statutory agencies such as the Homes England.
- 2.3. As part a revised approach to the 2017 Update the Council contacted agents, landowners and promoters of sites to comment upon the availability and achievability of each site as part of a positive approach to update the SHLAA according to the most up-to-date information available on a site-by-site basis. The 2018 adopts this approach.
- 2.4. The Council has been in discussions with landowners and developers through the Private Sector Housing Acceleration Scheme as part of the 2017 update by establishing contact through letters sent in June 2015, July 2016, and September 2016 following the purchase of title information from the Land Registry. The Council is now in on-going dialogue with developers to keep up-to-date construction programmes for sites with planning permission. This is the across the board approach taken in the 2018 SHLAA in order to obtain detailed site-specific information that informs assessments of deliverability as advocated by the Inspector and Secretary of State in recent decisions. This approach has been taken in the 2018 Update following consultation with members of the HBF in August and September 2018.
- 2.5. The Council consulted the HBF in August 2018 asking that their members review and provide comments on sites where they are the landowner or developer of the site or the agent acting on their behalf. The Council has also contacted landowners and their agents to collate clear evidence order to make informed decisions as to how sites contribute to the future supply of housing in Leeds.
- 2.6. The Council wrote again on 22 August 2018 to landowners, developers and agents of the sites in the current land supply, to confirm the availability of sites and produce an up-to-date and accurate picture of delivery. This informed the technical update of the information held for sites with views on viability and market activity forming part of the consultation.

3. Preparing the 2018 SHLAA

- 3.1. The preparation of the 2018 SHLAA reflects the most up to date guidance available, including the NPPG. In particular, the NPPG provides more detailed advice for carrying out a SHLAA, noting that it should:
- identify sites and broad locations with potential for development;
 - assess their development potential; and
 - assess their suitability for development and the likelihood of development coming forward (the availability and achievability).
- 3.2. The approach taken in the 2018 SHLAA provides an up-to-date and accurate picture of deliverability. Site assessments have been updated to reflect recent planning and construction activity across the district in accordance with national policy.
- 3.3. The sites included in the supply satisfy the requirements of paragraph 67 of the NPPF. The NPPG offers further guidance on paragraph 67. It states that local planning authorities may need to develop a range of assumptions and benchmarks to help to inform and test assessment and that assumptions should be based on clear evidence, consulted upon with stakeholders, including developers, and regularly reviewed and tested against actual performance on comparable sites. This guidance is especially relevant for a metropolitan authority the size and complexity of Leeds. This is the purpose of the SHLAA.
- 3.4. Annex 2 of the NPPF defines a deliverable site in the terms of an assessment of the timescale for delivery and the planning status of the site. To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. The Council adopts this approach in the SHLAA. This has been done by reference to the Site Allocations Plan process and consultation responses, alongside the latest development details of sites e.g. where sites which previously had planning permission for housing may have now been developed or proposed for other land uses. Such sites are removed from the SHLAA by making them dormant.
- 3.5. The NPPF advises that sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- 3.6. Where sites have an expired planning permission or no planning history, the SHLAA process has confirmed that sites remain undeveloped and available and the Council has written to landowners to confirm availability, timeframe for delivery and determined there are no identified impediments to the site being delivered. Many of these sites form the Council's Private Sector Housing Acceleration Scheme and officers are in dialogue with landowners and developers to bring forward developments in the short term. Sites that have a planning application pending are discussed with case offices and updated accordingly and the Council is also aware

of pre-application enquiries where a view to an application being submitted to the Council for the delivery of housing is being sought.

- 3.7. The Council agrees lead-in times and build out rates through the SHLAA Partnership where it is possible for sites currently without planning permission to obtain outline and/or detailed consent and see the start of completions from 24 months. This is based on actual completion rates on sites in different locations and across all markets of the district. Sites without planning permission where the Council has contacted a willing landowner to confirm pre-application activity which may see sites contribute to the deliverable supply from Years 3, 4 & 5 in accordance with NPPF paragraphs 30 and 48.
- 3.8. Where sites are in current or former alternative use, the Council has taken an informed approach and considered delivery likely to be achieved. The Council has contacted landowners to confirm availability and determine details of any existing tenancy agreements in order to assess deliverability upon the landowner obtaining vacant possession of the site together with lead-in times for planning application(s), commencement on sites and the delivery of completions. The short term supply (Years 1 to 5) does not include sites in alternative use with no planning permission as they are not assessed as “available now” for the purposes of the NPPF definition of deliverable and NPPG paragraph 20.
- 3.9. The revised NPPF and guidance is consistent with the previous version and adds further detail as to the evidential requirement needed on sites without a detailed planning permission. The Council has always produced clear evidence across all sites as part of the SHLAA process, thereby satisfying the NPPF approach just as it had satisfied the previous version. It has always been important to confirm an accurate position of housing land supply by identifying any factors leading to either delay or acceleration of house building on sites. This includes confirmation of any availability or ownership issues that would impact on the delivery of a site.

4. The Leeds Development Framework

The Core Strategy

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

The Site Allocations Plan and Aire Valley Leeds Area Action Plan

- 4.2. The Council is well advanced with the Site Allocations Plan (SAP) document with hearing sessions completed in October 2017 (for non-housing matters) and August 2018 (for housing matters). The Aire Valley Leeds Area Action (AVLAAP) Plan was

adopted in November 2017. Together these Plans set out where allocations for housing will be up to 2028.

- 4.3. The Revised Submission Site Allocations Plan (SAP) hearing sessions closed on the 3rd August 2018. The Plan, once adopted, will bring the comprehensive release of a range of sites, across 11 Housing Market Areas (HMCAs). In the City Centre, the Private Rented Sector (PRS) is an emerging sector in the home building industry in Leeds with potential for over 10,000 new homes over the next 10 years. SME and regional-scale developers will have opportunities for increasing activity across the District including on challenging brownfield sites proving possible to deliver viable and attractive schemes.
- 4.4. The AVL AAP (adopted in November 2017) includes allocations to deliver a minimum of 6,500 between 2012 and 2028 within the area focussed across five broad locations (South Bank/ East Bank/Cross Green/Hunslet Riverside/Skelton Gate), each strategically important in delivering the area's housing requirement and to supporting wider regeneration aspirations.
- 4.5. The SHLAA does not allocate land, but it has been the key source of sites for the SAP and AVLAAP. The SAP and AVLAAP plan making process has carried out assessments of SHLAA sites along with new sites which were not part of the SHLAA (sustainability appraisal, flood risk appraisal, tests against Core Strategy (CS) policies, infrastructure assessments and highways assessments).

5. Planning, Housing and Regeneration Programmes

- 5.1. Leeds is a metropolitan authority with large stocks of brownfield land close to existing infrastructure and transport hubs. The spatial strategy of the Core Strategy is to prioritise the delivery of brownfield land. However, in recognising a need for choice and competition in the market for land and to recognise that not all parts of :Leeds have stocks of brownfield land some greenfield and Green Belt release is proposed.
- 5.2. The Leeds Site Allocations Plan does not propose to phase the release of housing land, following interim views of the Inspector. This means that where a five year land supply cannot be determined inevitably releases must come from safeguarded land, which (in line with paragraph 85 of the NPPF) should be released through a Local Plan Review. This situation makes the need to ensure delivery of brownfield land in Leeds a top priority for the Council.
- 5.3. In order to significantly boost the supply of housing the Council is being proactive and has in place a number of measures and incentives to promote the delivery of regeneration and housing. These include delivering housing itself, particularly affordable housing, selling brownfield land in its ownership to promote housing, facilitating land sales and the approval of record numbers of applications for residential development.
- 5.4. As at 1 April 2018 there was outstanding capacity for 21,618 units (units yet to be built) that have planning permission with a further capacity for 12,711 units available

to gain planning permission on allocated land including nearly 6,000 on new allocations in the Aire Valley. Of the 21,618 units, 17,019 have detailed planning permission. Considering that 4,104 units are under construction, this leaves 12,915 units with detailed planning permission that have not yet started.

- 5.5. Last year was a record year in Leeds for greenfield approvals and for new permissions granted on both brown and greenfield sites in the post-recession market with 7,660 units approved in 2017/18. This follows a record level of planning approvals in 2016/17. The Council has continued to grant this level of approvals in the first few months of 2018/19. The total stock of sites with detailed planning permission now rests at 18,426 across 397 sites.
- 5.6. The Council has been working with the government and Homes England to unlock early and accelerated growth in the city centre housing market. The strategy has begun to deliver and there is considerable activity in the city centre and inner area. In the city centre, the private rental sector (PRS) is an emerging sector in the home building industry in Leeds with potential for over 10,000 new homes to come forward over the next 10 years.
- 5.7. There are over 60 current schemes with planning permission in the city centre and fringe, 11 of which are on sites that are under construction including over 700 at both Dandara on Sweet Street and Hunslet Mill in the Aire Valley. There are over 8,000 units with extant planning permission in the city centre and fringe including approvals for over 1,000 at City Reach on Kirkstall Road, 515 at Quarry Hill and over 300 at Low Fold on South Accommodation Road. Since 1 April 2016, 32 new schemes have been approved in the city centre with total capacity for over 3,500 new homes.
- 5.8. The Council has continued in its commitment to identifying brownfield sites for development and has published a Brownfield Land Register with over 300 sites to help lead the way in bringing forward previously developed land for new homes. The Registers will help house builders identify suitable sites quickly, with the intention of speeding up the construction of new homes.
- 5.9. The SHLAA has previously been updated on the Council's Housing Investment Land Strategy (HILS) which sets out a proactive approach to the use of all surplus land and buildings for the delivery of new homes. As an update to this, approval of more than £7million from the government's Housing Infrastructure Fund has been confirmed to support housing development on land to the east of Otley and at Roundhay Road in Chapeltown. Together the two schemes are capable of delivering 614 new homes in total, of which more than 200 will be affordable housing.
- 5.10. The bid for the funding was made by Leeds City Council working with the developers for each site. At Roundhay Road a partnership formed between Unity Housing Association and Chapeltown Co-housing (ChaCo) will benefit from a grant of £990,000 to remediate the site and to build affordable apartments for over-55's alongside an innovative project led by local people to create a co-housing scheme along with self-build opportunities.

- 5.11. In Otley, Leeds City Council is working collaboratively with developer Persimmon Homes and other landowners and are leading in bringing forward the critical infrastructure proposals for the site, which as a long-standing part of the city's agreed planning strategy is allocated for the development of 550 new homes as well as a new primary school, employment uses and greenspace. Funding of £6.3m will gap fund construction of a 1.5-kilometre East of Otley Relief Road that will, subject to planning permissions, allow housing development to start by providing an eastern bypass that will relieve traffic pressure on Otley town centre.
- 5.12. As part of the positive actions of the Council, over the past year the Council has been working with the Homes and Communities Agency (HCA) (now Homes England) and DCLG (now MHCLG) to unlock early, accelerated growth in the city centre housing market. Leeds has a good track record in working with partners across sectors to stimulate and support the housing market in our existing residential neighbourhoods, through schemes such as; the Housing PFIs; Brownfield Land Programme delivery; private sector housing investment; and the Housing Growth Programme (including a large new build council housing programme), albeit it is acknowledged that there has been comparatively less intervention to date to stimulate the City Centre housing market, which has taken comparatively slower than outer areas to recover from the recession.
- 5.13. The initiative 'Leeds Living' has emerged as a principal project to stimulate city centre growth and the necessary interventions which will enable it. This has developed alongside a separate discussion between MHCLG and core cities on the need for bespoke housing deals to further assist growth. It is intended for Leeds Living to serve this purpose.
- 5.14. It is estimated that with the right support and cross-sector partnership arrangements 14,000 new homes can be delivered by 2028 and accelerated in and around the City Centre, to create a mixed tenure residential market, and thriving city centre neighbourhood, accessible and available to all Leeds residents. This reflects the country's largest single local authority housing growth ambition, driven by the immediate and future growth of the Leeds economy, recent infrastructure improvements (such as the flood alleviation scheme) to open up the southern side of the City Centre for development, significant infrastructure investment in the form of HS2/HS3, and serve the overall objectives for the Northern Powerhouse.
- 5.15. As with other core cities, the Council benefits from ongoing dialogue with MHCLG and HCA (now Homes England) towards establishing a Housing Deal for the city that could unlock financial assistance and offer policy flexibilities and freedoms to enable accelerated and additional housing delivery. The main areas of focus are:

Funding and Finance: the Leeds Living proposition identifies the opportunity to accelerate the delivery of 15,000 new homes across the central part of the city, through a range of infrastructure, public realm and direct site interventions. On 28 September 2017 the Council submitted a Housing Infrastructure Fund (HIF) bid to Central Government, consistent with the ambition to drive delivery

in the short and medium terms. On 21 March 2018 the Council received notification that it had been successfully shortlisted for a bid award.

Housing Revenue Account (HRA): The Council is proposing that the cap on borrowing is lifted to enable the expansion its existing programme of 1,000 new build council homes. The Council's modelling illustrates a borrowing capacity to fund the delivery of an additional 1,500 new homes.

Planning policy: The Council has worked collaboratively with DCLG in being a pilot authority in the use of 'Permission in Principle' (PiP). The brownfield land register was published in December 2017 with PiP to follow in 2018. PiP will compliment site allocations and self/custom build and lend support to the SME house building sector.

Permission in Principle: Further to completion of the (Part 1) Brownfield Land Register the Council has programmed to determine (Part 2) PiP approvals for suitable brownfield sites alongside the 2018 SHLAA update.

5.16. Part of the Leeds Living initiative includes the realisation of the Leeds South Bank, a major regeneration opportunity in the plan AVLAAP area. It is one of Europe's most exciting sustainable growth locations whose regeneration I expected to compliment the transformation of Leeds City Centre construction. Property giant Caddick Group has launched plans for a £300m scheme to create a new neighbourhood in central Leeds. The new district named SOYO – (SOUth of YORk road) plans to be on site in 2018.

5.17. This is potentially a further, very powerful project for Leeds and could fulfil a number of roles:

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

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

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

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

- 5.18. The assessment of the deliverability of sites in the forward supply that are identified as part of 'Leeds Living' deal is not dependent upon funding. These sites are all adopted allocations in the AVLAAP or proposed allocations in the Site Allocations Plan at Examination. They have been submitted and considered as part of the Council's SHLAA process and are suitable sites that are available now with no impediments to delivery. The recent HIF bid is simply another programme in a range of measures designed to accelerate growth in the city centre alongside other regeneration initiatives undertaken by the Council working in collaborative ways with landowners and developers, which have properly been recorded as part of the SHLAA records for sites.
- 5.19. Further, the HS2 Growth Strategy already has a number of key workstreams and themes which are resourced and co-ordinated through the HS2 Growth Strategy Board. These will inform Leeds Living as this is progressed to support the delivery of the residential market in South Bank. The South Bank Framework already articulates a vision for development and growth in this area, which the emerging Infrastructure Plan will build on. The role of Leeds Living here will in the short term be to offer the necessary support and draw in appropriate resources to catalyse the early schemes in the South Bank that are currently close to the tipping point of investment and development commitment. On 22 March 2018 the Council welcomed a government announcement that a bid for funding of up to £113million for city centre infrastructure investment to support new housing and public spaces has progressed to a shortlisting stage.
- 5.20. As above, on 21 March 2018, MHCLG confirmed that Leeds is one of 44 national bids to the Housing Infrastructure Fund which has been approved to be shortlisted and go forward for further development and assessment. The Leeds bid is focused on supporting the acceleration of schemes to provide 16,500 new city centre houses and apartments across 60 sites.
- 5.21. Following success of the PRS model of delivery in London and Manchester institutional investors are bringing forward opportunities in Leeds which can accommodate a significant level of housing growth. Dandara is a key scheme for this model of delivery with a number of sites in the city centre now beginning to follow. The Dandara site has planning permission under 14/04641/FU by Ingram Row Limited and is under construction with groundworks started in 2016/17 and the site is currently under construction with the expectation of first occupancy in 2018/19. The delivery period reflects the completion of four buildings with Building 1 in 2018/19 with Buildings 2, 3 in 2019/20 & 4 in 2020/21.
- 5.22. The Council is in dialogue with the developers to keep an up-to-date construction programme that will be subject to financial considerations/market conditions. The PRS model of delivery looks set to be a game changer for the traditional rental market

and is amongst a number of concluding factors contributing to delivery in city centre (including Leeds Living, the Leeds South Bank regeneration opportunity, planning permissions activity over the last few years, pre-application activity in 2016 and 2017, and the emergence of PRS delivery model).

- 5.23. There has been no over-estimation of the number of housing units which will be delivered within the City Centre and Inner Area. The Council has rightly focussed on an assessment of deliverability, rather than a forecast of delivery, rejecting an inappropriately narrow view that may prevail with a very limited number of uninformed developers with regard to a specific selection of sites only. Such a view would pay little or no regard to the many and highly significant contextual factors above. Moreover, such a view would fail to acknowledge the uplift in the residential development pipeline and the activity in all markets and locations across the district.
- 5.24. In line with the NPPF, the Council has consistently made a clear priority to maximise the use of brownfield land in meeting the need for new homes across the district and we are actively engaged with incentivising the bringing back into use of brownfield sites. This approach is certainly no different now given the Core Strategy spatial strategy focussing on previously developed land and the main urban area, and the successful PiP piloting.
- 5.25. This strategy gains support from the recent Housing White Paper and recognises that a range of tools and solutions are necessary to stimulate delivery on brownfield sites. Conducive to the boosting of delivery on brownfield sites:
- 5.26. The Council's Housing Growth Team works across a range of Council services including: Planning, Regeneration, Asset Management and Housing to identify and implement interventions to stimulate housing growth primarily in areas in need of regeneration and on brownfield land.
- 5.27. A Housing Investment Land Strategy (HILS) includes a proactive 'live' view of surplus brownfield land in the Council's ownership that has potential for residential development and brings together all proposals for market-led or public sector funded housing on these into a co-ordinated approach to how, when and where housing can be delivered;
- 5.28. The Council is well positioned to use its land to support regeneration and housing growth. In July 2013 the Council adopted a Housing Investment Land Strategy (HILS) which sets out its proactive approach to the use of all surplus land and buildings for the delivery of new homes. The HILS provides an up to date and 'live' view of all the surplus brownfield land in the Council's ownership that has potential for residential development and brings together all proposals for market-led or public sector funded housing on these into a co-ordinated approach to how, when and where housing can be delivered. The SHLAA considers whether sites are within the HILS framework, and their inclusion is considered to strengthen their achievability. The HILS advocates:
- open market disposal of LCC land to willing developers;

- tailored and packaged approaches to clustered sites;
- working with Registered Providers of affordable housing to support bids for funding and to commit sites for delivery;
- directly undertaking the construction of new Council homes.

5.29. In April 2017, 917 homes in Seacroft, Halton Moor and Osmondthorpe were granted permission across a range of sites assembled by the Council under the Brownfield Land Programme. They are being delivered by Keepmoat and Strata builders.

Permission in Principle

5.30. As above, the Council had been invited by DCLG in January 2016 to be a pilot authority for the Brownfield Land Register project. As part of the project, the Council put together a pilot register of over 300 suitable sites with a total capacity of over 30,000 new homes which will all have planning permission following the provisions to publish a register by 31 December 2017. PiP is a new instrument by which it is envisaged that a significant level of housing supply in Leeds will be enabled through the brownfield land register. PiP will confirm the principle and amount of residential development for relevant sites, thereby providing developers with increased certainty, subject only to the technical details stage.

5.31. The final register (Part 1) was published on 20 December 2017 and constitutes an online portal of 'ready to develop brownfield land' that provides a package of site information, planning status and a map (site plan). This is integrated with the background evidence held underpinning the Council's SHLAA. The sites were identified from the SHLAA in four stages: (i) identifying provisional sites; (ii) assessing site suitability; (iii) compiling a pilot register; and (iv) publication of a pilot register. The assessment of sites is consistent with the SAP. In September 2018, the Council set a work programme for Part 2 to formally approve Permission in Principle on the sites included in the register.

5.32. The Council has registered interest from a number of developers seeking to benefit from the provisions of PiP on sites of all sizes, including large sites in the city centre. This includes the site at Marsh Lane Goods Yard where the Council assesses 289 units as deliverable in the five years period. This reflected the position as at 1 April 2017 including the placement of the site in the emerging AVLAAP. Since 1 April, the AVLAAP has been through Examination and was adopted on 8 November 2017. Developers have been in discussions with the Council through a PiP enquiry, to bring forward a scheme this year. The developer (Rushbond) is now pursuing a scheme with an increased capacity of 1,000 units in line with the sites placement in the Leeds Living programme for delivery working in partnership with the Council.

SME Sector

5.33. The Council also recognises Government's support for the SME sector, including the reshaping of the Builders' Finance Fund, which enables support for small sites and recognises that the business model for SMEs is different to that of the volume

builders. Through the Private Sector Acceleration Programme, the Council is already working with SMEs to address stalled sites, through providing planning advice, work locally with the HCA and de-risk sites. Since this programme commenced, development has commenced on 12 sites delivering a total of 1,200 units with a further 14 sites moving through the planning process.

Housing Revenue Account

- 5.34. The Council is engaging with other developers, SMEs and regional house builders in addition to building its own homes through Council House building. The programme to deliver 1,000 new council homes is delivering at pace and demonstrates Leeds' ability to deliver new housing at scale. In addition to HRA resources of £134m, £16m HCA grant has been secured to match and stretch HRA resource to support increased housing supply.
- 5.35. The Council will be working closely with the development industry and other partners to clarify and encourage high quality growth and share ideas and experience – and actively use our own assets and knowledge to unlock housing opportunities and deliver more homes.

6. The 2018 Update

NPPG Stage I: Identification of sites and broad locations

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

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

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

NPPG Stage II: Site assessment

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

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

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

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

6.13. The issue of achievability has been at the heart of the Leeds SHLAA. Paragraph 21 of the NPPG states: *"A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period"*.

6.14. The NPPG notes that this is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period. The resulting SHLAA analysis must also reflect the requirements of the Framework when considering sites in the short term (the next 5 years). The Framework states, *"To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect*

that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans”.

- 6.15. An assessment of viability in Leeds has been tested through two Examinations - the Core Strategy and the CIL Charging Schedule. At both Examinations, the Inspector has determined that there is evidenced viability across all areas of Leeds. Housebuilder representatives on the SHLAA Partnership have confirmed this position. The Council is content there is no contradictory evidence to undermine these conclusions in respect of sites.
- 6.16. The NPPG and the Framework together is that a realistic prospect of development at a particular point in time must be applied for all sites in the 5 year supply (short term). The Framework states that sites with planning permission should be considered deliverable unless there is clear evidence that they will not be implemented. The Framework at paragraph 67 provides more detail on the evidence sought between a short term site (i.e. the next 5 years) which must be considered deliverable and a medium term to longer term site (i.e. 6+ years) which must be considered developable.
- 6.17. The 2018 Update reflects this and sources information about potential deliverability issues on sites with planning permission from Development Management officers and local knowledge gained through the SHLAA partnership and consultation with HBF members.
- 6.18. The Council uses the information it has on suitability, availability, achievability and constraints to assess the timescale within which each site is capable of development. The methodology for the SHLAA is set out at Appendix 1 and makes the following general criteria about when development can start on suitable, available and achievable sites. This may include indicative lead-in times for the development of different scales of sites and where more up to date intelligence is available the general criteria are not used.

NPPF Stage III: Windfall assessment

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

NPPF Stage IV: Assessment review

- 6.20. The SHLAA Partnership went through a detailed process of looking at individual sites and seeking to agree suitability, availability, achievability, start dates and build out rates. The broad methodology is included as Appendix 1 to this report.
- 6.21. The SHLAA has been aligned with the SAP and AVLAAP as follows:

- i. Changes to capacities as a result of more detailed assessment and requirements
- ii. Amendments to site boundaries according with submissions to the SAP and AVLAAP and to align with sites which have been merged together in the SAP and AVLAAP¹
- iii. Amendments to availability and achievability on the basis of site submissions
- iv. Amendments to delivery for those sites not allocated for housing, to beyond the plan period, so that they remain in the SHLAA to be considered at a future review of the plan
- v. Amendments to delivery for those sites proposed to be allocated as Safeguarded Land so that they sit in year 2028 onwards i.e. the year following the end of the plan period, should they be needed.
- vi. New sites received through the SAP and AVLAAP consultation process.

6.22. New sites have been assessed from two key sources:

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

NPPF Stage V: Final evidence base

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

6.24. The Leeds SHLAA is published as a list of all sites or broad locations considered, cross-referenced to their locations on maps, an assessment of each site, in terms of its suitability for development, availability and achievability including whether the site/broad location is viable, to determine whether a site is realistically expected to be developed and when.

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

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

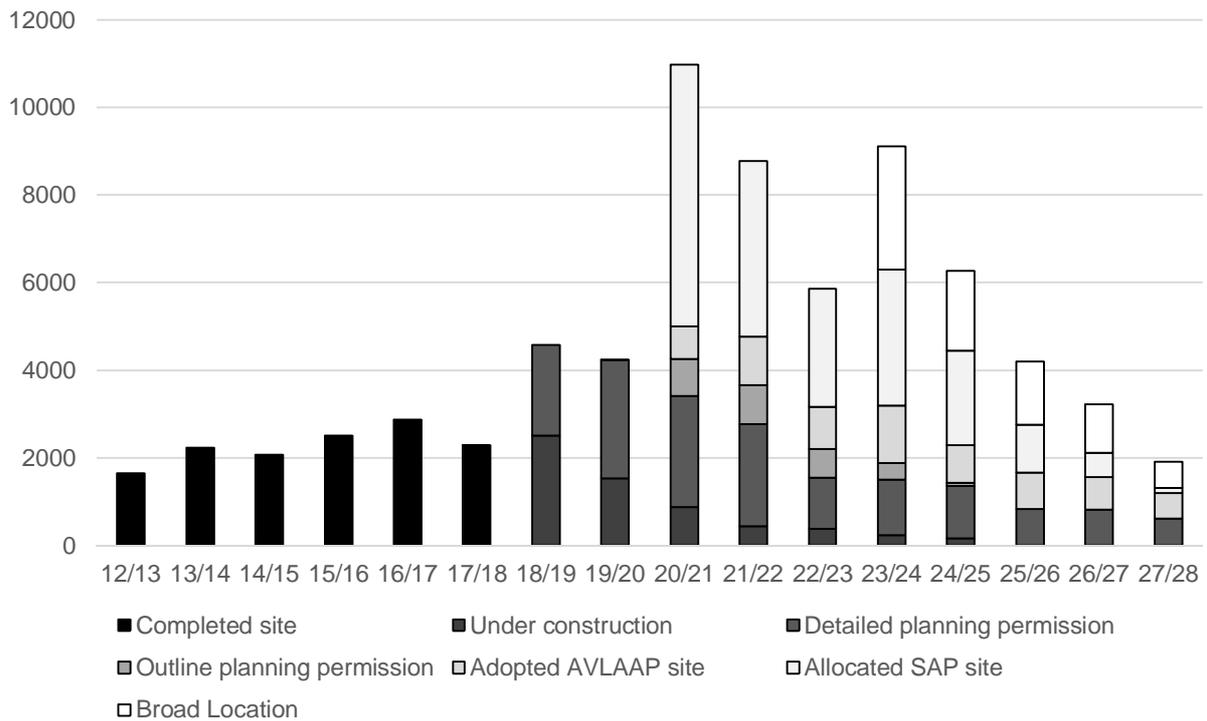
6.26. The 2018 Update assesses 1,215 sites with a total capacity of 203,917 dwellings. Of these, 282 sites are considered to be suitable, available and achievable contributing a total of 59,229 units to the identified deliverable supply between 1 April 2018 and 31 March 2028. Table 1 and Figure 1 below shows a rolling trajectory of identified supply from available, suitable and achievable SHLAA sites (i.e. excludes windfall) that will be updated on an annual basis.

Table 1: 2018 SHLAA sites by type

Type	Sites	2018-23	2023-28
Under construction	103	5,752	410
Detailed planning permission	145	10,816	4,733
Outline planning permission	20	2,404	455
Adopted AVLAAP site	24	2,814	4,328
Allocated SAP site	215	12,695	7,007
Broad Location*	43	0	7,815
Total	282	34,481	24,748

*suitability to be determined by plan review

Figure 1: Trajectory of deliverable supply by year



7. Conclusions

7.1. This 2018 SHLAA update takes the process forward and highlights the following key points:

- improving market conditions and greater confidence in investment decisions.
- an increase in the number of outlets under construction across all markets.
- a boost in supply through record levels of planning approvals, housing growth initiatives and the adoption of the AVLAAP and advancement of SAP.

Appendix 1

Introduction

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

Criteria for inclusion

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

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

Site Details

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

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

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

Planning

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

LCC Dwellings

Capacity

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

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

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

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

- Steep slopes
- Heavy tree cover
- Awkward shape

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

Start date

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

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

Build-out-rates

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

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

LCC Conclusions

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

Suitability

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

Availability and Achievability

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

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

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

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

Conclusions are set out as:

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