
Report of the Chief Planning Officer

Report to Development Plan Panel

Date: 15th October 2019

Subject: Site Allocations Plan Review

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 checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Is the decision eligible for Call-In?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Does the report contain confidential or exempt information? If relevant, Access to Information Procedure Rule number: Appendix number:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Summary of main issues

1. The Leeds Site Allocations Plan (the SAP) was adopted by Full Council on 10th July 2019.
2. The SAP Policy HGR1 requires that once the CSSR is adopted the Council will undertake a review and look again at whether there is a need for additional housing allocations to deliver the adopted housing requirement post 2023. The CSSR was adopted at Full Council by 11th September 2019.
3. This report outlines initial considerations in reviewing the SAP and an indicative timetable.

Recommendation

4. Development Plan Panel is invited to note the considerations outlined in reviewing the SAP housing allocations, in advance of a further report being brought back to DPP in due course.

1 Purpose of this Report

- 1.1 The purpose of this report is to provide members of the Development Plan Panel with an outline of initial considerations for the SAP review. This is in light of the Adoption of the Core Strategy Selective Review, which sets a lower housing requirement. The SAP was adopted by Council on 10th July. SAP Policy HGR1 requires that once the CSSR is adopted the Council will undertake a review and look again at whether there is a need for additional housing allocations to deliver the adopted housing requirement up to 2033. The CSSR was adopted on 11th September, so an immediate review of the SAP in the light of the revised lower housing target is now needed.

2 Background Information

- 2.1 The Core Strategy (CS) was amended on 11th September 2019 by the adoption of the CSSR and the City has a new housing requirement of 51,952 (net) between 2017 and 2033. This is the amount of housing Leeds needs to build.
- 2.2 The Adopted Site Allocations Plan (2019) identifies land for 59,718 homes between 2012 and 2028. This is the amount of housing land supply that Leeds currently has, as measured for the purposes of the SAP.
- 2.3 As the preparation of the SAP and the CSSR were two separate processes, the SAP did not seek to align its supply with the CSSR plan period. Nor did the CSSR consider the supply of land in the SAP. To do so would have not been sound, was cautioned against by the Inspectors and would not have been practicable, as the issues dealt with by the two different plans were only settled on Adoption.
- 2.4 In January 2018, Executive Board considered whether to pause the SAP to allow the CSSR to “catch up” and the decision was taken to carry on with a revised SAP. The revision to the SAP reduced the amount of Green Belt released to that needed up to 2023 in order to reflect a lower housing trajectory. At this stage it was accepted that the two processes could not be conflated without significant delay. This would have put at risk the Council’s objective of getting a plan in place as quickly as possible to stem the flurry of S78 appeals on PAS land, resist speculative development and to comply with Government requirements for full plan coverage and housing delivery.

3 Main Issues

- 3.1 In reflecting both the recommendations of the SAP Inspectors’ Report (policy requirement to review the SAP and submit the review for examination before the end of 2021) and a need to provide clarity for local people and investors, the SAP Review needs to be undertaken as a priority. The focus of this will be whether release of any further housing land is necessary against the new CS housing requirement and plan-period to 2033. Essentially, the emphasis of this is to ensure that the housing land supply will extend 5 years longer than the previous end date of 2028 (in the SAP) i.e. up to 2033 to align with the new CS plan period.

- 3.2 Whilst the CS (as amended by the selective review) requirement is for 51,952 (net) homes between 2017 and 2033, allocations will be needed for only 46,352 homes. This is set out in Policy SP6 and takes into account the need to add demolitions of housing (estimated at 150 dwellings per annum) and discount a windfall allowance (estimated at 500 dwellings per annum).
- 3.3 There are a number of technical exercises which are required to be completed to inform the evidence base, which will in turn inform the scope of options for the SAP Review. These are important because development plan documents are required to be based on sound evidence and an independent inspector will need to take a view that the approach is sound. In sum this work will involve calculating the deliverable land supply in Leeds and assessing whether this is sufficient to provide the level of allocated land in line with the amended Core Strategy housing requirement.
- 3.4 Specifically the required work includes:
- Extending the plan period so that it aligns with the Core Strategy (as amended) to 2033
 - Discounting housing sites in the SAP, which have already been built (2012-2017) (estimated around 9,000 homes)
 - Taking account of past delivery rates during this period by HMCA
 - Look at the up to date deliverability of the housing supply (done through a Strategic Housing Land Availability Assessment¹ Update)
 - Consider the effect of any permissions granted since adoption of SAP to see whether there are any changes to SAP site capacities or large windfalls that need to be taken into account
 - Consider the need for buffers and flexibility
- 3.5 Following this there is a need to consider whether there is a shortfall in authority wide supply of housing and / or whether that aligns with the distribution of housing as set out in CS Spatial Policy 7 (which sets the % targets for each HMCA). This aims to provide a distribution so that all areas can benefit from the right levels of housing, infrastructure and investment, to enable District wide needs to be met.
- 3.6 Having done this technical work, Members will – at a future DPP meeting – need to come to a view on whether any more housing sites are required to meet housing needs up to 2033.

4 Other areas for the Review to consider

- 4.1 The SAP also covers green space, employment, retail and Gypsies and

¹ A requirement of national guidance to look at the delivery prospects of every site that the Council knows about in terms of its deliverability (including availability and viability), start date and build out. It is through the SHLAA that the Council gets information for its Plans and sets out its 5 year housing land supply. The Council works with the industry to gather the information annually.

Travellers. As the SAP has recently been adopted, policies in the Plan on these matters are considered to be up to date and in line with the CS (as amended) 2019. For Gypsy and Traveller sites, the SAP in Policy HGR2 requires that Gypsy and Traveller site provision is monitored and subject to a review if the quantum of sites is less than 13 at the end of March 2023. That review is therefore separate from the scope of this immediate SAP Review which will focus solely on housing.

- 4.2 Strategic policies across the whole of the development plan (including the UDP, Aire Valley Plan, Core Strategy and Natural Resources and Waste Local Plan) are currently being reviewed, as part of an overall Local Plan Review, to see if they need to be updated. A report will be brought back to DPP on this, but it is likely that updated policies will focus on those that are out of date, require up to date evidence, no longer align with revisions in the NPPF or are not in line with the Council's strategies for health and well-being, inclusive growth or the Climate Emergency.
- 4.3 The SAP Review will be undertaken within the context of the Council having declared a Climate Emergency. As before, the plan will be subject to the statutory requirements of the Sustainability Appraisal/Strategic Environmental Assessment Directive. The focus of this, if new sites are required, will be a systematic comparative assessment against 22 sustainability objectives. These cut across Environmental, economic and social objectives – incorporating climate change adaptation and mitigation. Nevertheless it will be very important to clarify the links and the relationship to the CS (as amended 2019) policies and the Local Plan Review. This will need to emphasise also that whilst the Climate Emergency has been declared the Council is also committed to the need for managed housing growth and delivery to meet needs.

5 Next steps

- 5.1 The technical work set out above has commenced and depending on the progression of the SHLAA a detailed scope and early headline messages can be brought back to Development Plan Panel in due course.
- 5.2 The SAP Review process will need to follow the Council's Governance requirements and plan making regulations as follows, in the indicative timetable.

Stage	Governance	Details	Dates (TBC)
Scoping	Development Plan Panel	<ul style="list-style-type: none"> To consider initial scope 	<i>Late 2019</i>
	Executive Board	<ul style="list-style-type: none"> Policy areas being reviewed Reasonable alternatives Initial evidence base 	6 week consultation <i>Early 2020</i>
	Scrutiny Board	<ul style="list-style-type: none"> To consider scope 	<i>Early 2020</i>

Stage	Governance	Details	Dates (TBC)
Drafting	Development Plan Panel	<ul style="list-style-type: none"> • Response to consultation • Detailed evidence base / SA / Duty to Cooperate 	Depends on scope and consultation response
Draft Plan	Executive Board	<ul style="list-style-type: none"> • Draft policies • Select sites if required 	6 week consultation <i>Mid 2020</i>
Submission	Council	<ul style="list-style-type: none"> • To Secretary of State 	<i>Late 2020</i>
Examination	Planning Inspectorate	<ul style="list-style-type: none"> • Hearing sessions 	<i>Early 2021</i>
Adoption	Council	<ul style="list-style-type: none"> • Following modifications 	<i>Mid 2021</i>

6 Corporate Considerations

6.1 Consultation and engagement

- 6.1.1 Once the methodology for the review of the SAP is agreed, the Plan will follow the statutory procedures, including consultation and engagement at different stages of the plan making process, in compliance with the SCI.

6.2 Equality and Diversity/Cohesion and Integration

- 6.2.1 The SAP review will give due regard to Equality, Diversity, Cohesion and Integration issues, including EDCI screening and meeting requirements of the Strategic Environmental Assessment Directive, including sustainability appraisal (SA). The SA objectives incorporate and embed issues of EDCI within them.

6.3 Council policies and Best Council Plan

- 6.3.1 The Local Plan, including the SAP, plays a key role in taking forward the spatial and land use elements of the Vision for Leeds and the aspiration to be the Best City in the UK.

6.4 Resources and Value for Money

- 6.4.1 Whilst a review of the SAP will incur further costs associated with the preparation of a plan, having an up to date plan in place will represent value for money and continue the full plan coverage Leeds currently has, which helps to prevent speculative development.

6.5 Legal Implications, Access to Information and Call In

- 6.5.1 The SAP Review is a development plan document which falls within the Council's budget and policy framework, this includes referral of the Plan to the relevant Scrutiny Board. All other decisions relating to it are not therefore subject to call in.

6.6 Risk Management

- 6.6.1 A review of the SAP is necessary to conform with policy HGR1 in the adopted SAP which states that housing allocations will be subject of a review once the CSSR is adopted. Having an up to date plan in place is of paramount importance in avoiding speculative developments on sites not allocated for development in a plan.

7 Conclusions

- 7.1 This report provides an outline of initial considerations in reviewing the SAP. A review of SAP housing allocations only, is needed now the CSSR (which includes a revised housing requirement to 2033) is adopted. A report outlining updated figures on housing delivery and proposed options for the scope of the review will be brought back to DPP in November.

8 Recommendation

- 8.1 Development Plan Panel is invited to note the considerations outlined in reviewing the SAP housing allocations, in advance of a further report being brought back to DPP in due course.