

City Development Directorate

Policy and Plans Group

Major Projects Team

Appendix 3



Strategic Housing Land Availability Assessment

2020 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 (and updated on 19 February 2019).
- 1.2. 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.
- 1.3. 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.
- 1.4. The previous Leeds SHLAA worked to a base date of 1 April 2019. This SHLAA Update works to a base date of 1 April 2020. 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.
- 1.5. 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.
- 1.6. The SHLAA has previously been subject to examination at public inquiries at Thorp Arch Trading Estate, Wetherby and subsequently updated at Tingley Station (up to 770 dwellings at land at Dunningley Lane). Both inquiries considered the five year supply position as sourced from the 2017 Update. The Secretary of States conclusion noted confidence in the Council's *"...thorough and proactive approach to land availability"*.
- 1.7. The SHLAA site information was presented to support the allocation of sites in the Site Allocations Plan at Examination between 24 October 2017 and 3 August 2018. The Inspectors Report released on the 7 June 2019 noting that *"It is considered that the assumed build-out rates contained in the SHLAA are realistic and robust"*. The Site Allocations Plan was adopted on 10 July 2019.
- 1.8. The 2020 update takes account of new planning permissions and construction activity to a base date of 1 April 2020. The Council has been keen to fully reflect the challenges or opportunities to delivery that might arise as a result of the Covid-19 pandemic.
- 1.9. The update is informed by recent national planning policy announcements, current market adjustments and any challenges posed to housing delivery by Covid-19.

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, landowners, agents and applicants of planning applications. The partnership includes internal consultation across directorates including regeneration, asset management and council house building teams. Consultation arrangements are followed to collate clear evidence from all stakeholders in order to produce the most accurate and up to date picture of supply across all sites.
- 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 Home Builders Federation (HBF), housebuilders (including SMEs and volume builders 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 SHLAA process during 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 previous updates followed this methodology and the 2020 also 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 update process by establishing contact via contact details obtained from title information from 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 2020 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 appeal decisions. This approach has been repeated in the 2020 update following consultation with landowners, agents and developers in September 2020 and members of the HBF in October 2020.
- 2.5. Following the purchase of further land ownership information from the Land Registry, the Council wrote again on 28th September 2020 and 5th October 2020 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.
- 2.6. The Council wrote to landowners to establish the changes posed to the housing market by Covid-19, which may create challenges or opportunities for different types of sites and to make clear that it was important that landowners confirmed whether the assessment reflected an accurate picture of delivery. Where it was not, the Council asked what factors are leading to either delay or acceleration of construction on sites

so it could update our records in addition to any availability or ownership issues that would impact on the achievability of the site.

- 2.7. The Council consulted the HBF in September 2020 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 in order to make informed decisions as to how sites contribute to the future supply of housing in Leeds. The details of all construction programmes provided to the Council are accurately reflected in the final 2020 SHLAA.
- 2.8. Following completion of technical updates and consideration of observations and forecasts of its members of current market prospects, the Council consulted the HBF in November 2020 to provide the wider view of the HBF on current market activity and longer term prospects across markets nationally and for locations in Leeds.

3. Preparing the 2020 SHLAA

- 3.1. The preparation of the 2020 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 2020 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, which 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 (updated 19th February 2019) 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. As well as sites which are considered to be deliverable in principle, this definition also sets out the sites which would require further evidence to be considered deliverable. The Council adopts this approach in the SHLAA. This has been done by reference to the Site Allocations Plan process and SHLAA consultation responses, alongside the latest development details

of sites. 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. Where a landowner has confirmed that a site is no longer available it is made dormant and removed from the current land supply.

- 3.5. The NPPF advises that sites that are not major development, and all sites with 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). Where a site has outline planning permission for major development, has been allocated in a the development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.
- 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 regeneration support programmes and officers are in dialogue with landowners and developers to bring forward developments in the short term. Sites that have a planning application pending a decision are discussed with case officers 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 onwards. This is based on actual completion rates on sites in different locations and across all markets of the district. Sites without planning permission can contribute to the deliverable supply from Years 3, 4 & 5 in accordance with NPPF paragraphs 30 and 48 where the Council has contacted a willing landowner to confirm pre-application activity and delivery within 5 years. Sites currently under construction and with detailed planning permission contribute to delivery in Years 1 & 2.
- 3.8. Where sites are in 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 without planning permission as they are not assessed as "available now" for the purposes of the NPPF definition of deliverable and NPPG paragraph 19. Further, sites with expired planning permissions are set outside the short-term picture unless there is evidence of active planning application activity to bring the site forward.
- 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 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 Local Plan

The Core Strategy 2014

- 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.
- 4.2. Executive Board resolved to undertake a selective review of the Core Strategy (CSSR) in February 2017. It agreed a targeted scope focussing on: updating the housing requirement for a revised plan period of 2017 and 2033.

The Core Strategy (as amended) 2019

- 4.3. 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. .
- 4.4. The adopted annual housing target from 2017 is 3,247 dwellings per annum. The current plan period ends in 2033.

The Site Allocations Plan and Aire Valley Leeds Area Action Plan

- 4.5. The Council adopted the Site Allocations Plan (SAP) on 10 July 2019. 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. Post adoption, the Site Allocations Plan was the subject of a Legal Challenge submitted to the High Court on 20 August 2019. The case was heard at the High Court in February 2020, with Judgment being handed down on 8 June 2020. The High Court has now ordered all that allocated sites that immediately before the adoption of the SAP were in the Green Belt be remitted back to the Secretary of State and the Planning Inspectorate for further examination.
- 4.6. The Plans bring together 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.

- 4.7. The AVLAAP includes allocations to deliver a minimum of 6,500 homes 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.
- 4.8. The SHLAA does not allocate land, but it has been the key source of identifying sites for allocation within the SAP and AVLAAP and the assessments for availability and achievability relied upon to as the evidential basis for the deliverability of the now adopted plans.

5. Planning, Housing and Regeneration Programmes

- 5.1 The Council has a range of strategies and programmes in place to unlock land and support the delivery of new homes. This recognises that the private sector is unlikely to be able to deliver the quantum of homes to meet the city's needs in isolation, and the important role that the Council and other public sector bodies will have in directly developing new homes. It also acknowledges that some sites may require targeted support if their potential for development is to be fully realised.
- 5.2 More planning permissions have been granted for housing over the past five years than at any time including a record breaking level in 2018/19 of nearly 10,000 units in a single year. The number of homes approved are now well above the City's housing requirement figures. During this period, 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. 75% of all planning approvals in the last 5 years have been on brownfield sites and completions remain overwhelmingly on previously developed land, which is reflective of the Council's overall strategy for sustainable growth focused in the city centre and main urban area.
- 5.3 The Council has granted more planning permissions for housing over the past five years than at any time. The number of homes approved are now well above the City's housing requirement figures. Approvals have been granted for over 43,241 new homes since 2012, well in excess of the target for the same period.

Year	Brownfield	Greenfield	Total	% Brownfield
2012-13	1,672	830	2,502	67%
2013-14	4,057	991	5,048	80%
2014-15	6,052	556	6,608	92%
2015-16	3,395	1,633	5,028	68%
2016-17	3,615	3,177	6,792	53%
2017-18	5,377	2,283	7,660	70%
2018-19	8,300	1,303	9,603	86%
2019-20	2,818	901	3,719	76%
Total	35,286	11,674	46,960	75%

- 5.3 The total stock of outstanding capacity is 28,931 units either currently under construction or yet to start across 415 sites. As at 1 April 2020 there were 221 sites with planning permission where development had not yet started. These approvals have a total capacity of 16,612 units. Of these units, 14,246 across 192 sites are on brownfield land with the remaining 2,366 on 29 greenfield sites. As a result of the Covid-19 pandemic and lockdown measures, the government confirmed that all approvals set to expire between 23 March and 31 December 2020 will be automatically extended until 1 April 2021. The Council has updated the pipeline of housing land supply accordingly. Approvals for 2,046 new homes on 52 sites have been automatically extended to 1 April 2021. 47 are sites on previously developed land for 1,477 units with the remaining 983 units on 5 greenfield sites.
- 5.4 The level of construction activity across the district is strong with over 100 sites currently operating with around 5,200 individual plots actively under construction. The current pipeline of sites in the AVLAAP and SAP is 50,000 homes on just over 650 sites with nearly 29,000 of these benefitting from planning permission. Almost 20,000 homes can be accommodated on sites in the city centre and inner area alone predominately on previously developed land following the success of regeneration initiatives to support the market in these areas, which include South Bank Leeds, *'Europe's most exciting regeneration project'*. 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.
- 5.5 This work is led by a number of teams within the Council, who work together with the common goal of boosting housing delivery. This involves those from Planning, Housing and Regeneration, and includes the multi-disciplinary Housing Growth Team, who have been specifically established to drive forward the delivery of new homes across tenures, and tackle specific issues associated with stalled or otherwise challenging sites.

- 5.6 The Council continues to press for increased build out rates and acknowledges the Government's report as part of the *Letwin Review* to support proposals that diversify the market in order to accelerate construction to meet housebuilding targets. The Site Allocations Plan released a volume of large sites (over 50 units) capable of higher build out rates. The trajectory of deliverable sites is based on build rates and pre-build lead-in times which are applied to the assessment of the delivery timescales. 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 (for example, skilled labour, construction finance and the cost of building materials) and the demand for new homes in different locations across Leeds. The Council has undertaken the detailed process of looking at individual sites and seeking to determine suitability, availability, achievability, start dates and build out rates.

6. The 2020 Update

NPPG Stage I: Identification of sites

- 6.1. The area selected for the Leeds SHLAA is the Leeds Metropolitan District boundary as identified in the adopted Core Strategy (2019). 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. As a matter of good practice, Council officers have participated in discussions and workshops with regional housing land supply practitioners to share advice on the approach to SHLAA methodology, up-to-date case law, recent appeal decisions and interpretation of national policy and guidance.
- 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, the Leeds Property Forum, regional planning bodies and the Local Enterprise Partnership.
- 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, brownfield sites, surplus land, greenfield and Green Belt sites. 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.
- 6.5. The Council has actively sought sites for consideration through the SHLAA since 2009 and continues to receive them. 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”. In line with national guidance, the SHLAA is a ‘live’ document and submissions can be made at any time to the mailbox at SHLAA@leeds.gov.uk. Land submitted throughout the year for inclusion and assessment in the SHLAA have been included in the 2020 update as new sites.

- 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. Sites have also been identified as part of the Council’s involvement as a lead authority in the pilot project of the Government’s Brownfield Land Register which was first published in December 2017 and is maintained annually as part of the SHLAA process.

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 CS (particularly the spatial development strategy policies SP1 to SP10), the AVLAAP and SAP.
 - 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:

- site submissions – 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 consultation processes on each update (including from the landowners, agents, developers and members of the HBF)
- on-going dialogue with landowners, agents, developers

6.13. The issue of achievability has been at the heart of the Leeds SHLAA. Paragraph 20 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 seek 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 2020 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 year. This is a conservative allowance based on historic delivery of small sites below the SHLAA site size thresholds. Windfall sites are planning permissions approved on sites under 0.2ha outside the city centre.

NPPF Stage IV: Assessment review

- 6.20. The SHLAA assessment group went through a detailed process of looking at individual sites and seeking to agree suitability, availability, achievability, start dates and build out rates based on actual planning and construction activity in the previous year. 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 planning approval activity between 1st April 2019 and 31st March 2020.

- 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 consultation responses .
- 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 allocated as Safeguarded Land so that they sit in year 2033 onwards i.e. the year following the end of the Core Strategy period should they be needed.

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

- i. Sites which have received planning permission but were not in the previous 2019 SHLAA update
- ii. Sites which have been submitted to the SHLAA but were not in the previous 2019 SHLAA update.

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 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 absolute certainty, reflecting market conditions and the capacity of the development industry to deliver in different locations. The Council have undertaken the detailed process of looking at individual sites and seeking to determine suitability, availability, achievability, start dates and build out rates. The methodology is included as Appendix 1 to this report.
- 6.26. The 2020 update assesses 1,195 sites with a total capacity of 196,457 dwellings. Of these, 454 sites are considered to be suitable, available and achievable contributing a total of 42,745 units to the identified achievable supply from SHLAA sites between 1 April 2020 and 31 March 2033. A further 36 of the 37 remitted Green Belt sites from the Site Allocations Plan are without planning permission but remain available and achievable, however, their suitability must be determined by further examination from

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.

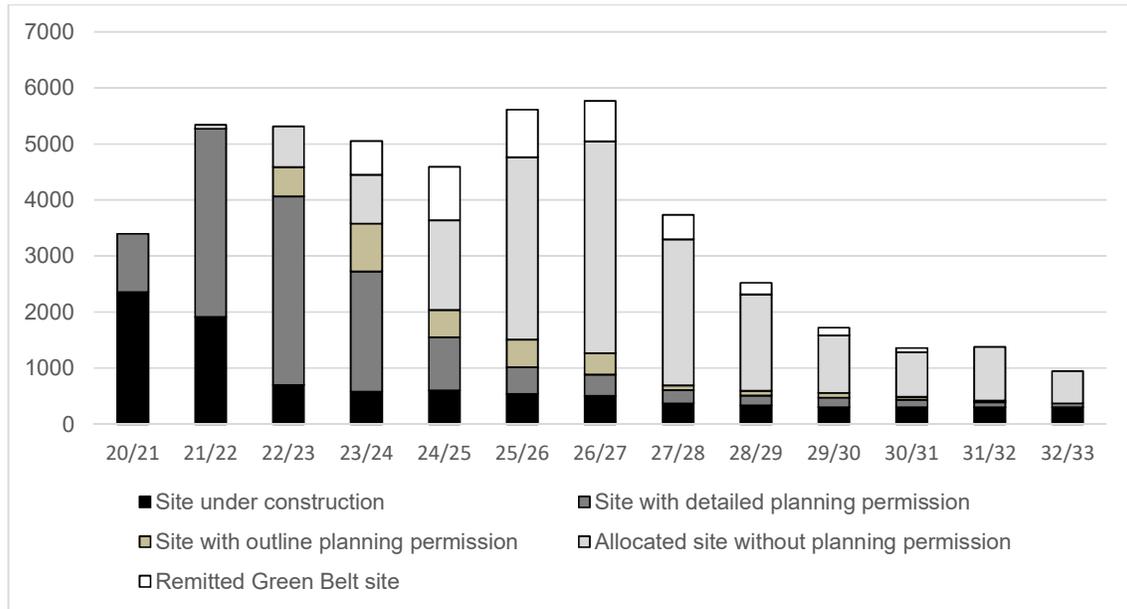
the Secretary of State and the Planning Inspectorate. Table 1 and Figure 1 below shows a rolling trajectory of 46,728 units of identified supply from available and achievable SHLAA sites (i.e. excludes windfall) that will be updated on an annual basis.

Table 1: 2020 SHLAA sites by type

Type	Sites	To 2025 (5YHLS)	To 2028 (SAP)	To 2033 (CS)
Site under construction	90	6,146	7,555	9,090
Site with detailed planning permission	159	10,863	11,962	12,609
Site with outline planning permission	26	1,862	2,819	3,074
Allocated site without planning permission	179	3,261	12,899	17,972
Remitted Green Belt sites*	36*	1,557	3,558	3,983
Total	490	23,689	38,793	46,728

* HG2-17 Breary Lane, Bramhope has detailed planning permission and is under construction

Figure 1: Trajectory of supply by year



7. Conclusions

7.1. This 2020 SHLAA update takes the process forward and notes the following key points:

- i. a healthy level of supply maintained through record levels of planning approvals in recent years
- ii. housing growth initiatives following the adoption of the AVLAAP in November 2017 and SAP in July 2019
- iii. improved market conditions and greater confidence in investment decisions in the city centre
- iv. an increase in the number of outlets and capacity of sites under construction across all markets and locations

- v. more conservative assessment of delivery in 2020/21 as a result of the Covid-19 pandemic but confidence remains in long term prospects of both supply and delivery of new homes

Appendix 1 - Methodology

Introduction

This report update sets out all the collated information and site conclusions reached for all active sites which form part of the Leeds SHLAA. The sites are mapped on an Ordnance 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 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 allocated for housing or mixed-use development in the Leeds Site Allocation Plan and Aire Valley Leeds Area Action Plan. 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 SHLAA updates and planning application details submitted as part of permissions approved up to 1st April 2020.

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
- Expired site with no recent activity = Yr 6 (excluded from five year housing land supply)

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 35 dwellings per annum and a maximum of 50 units per outlet (where submitted and agreed with the developer) for is achievable depending on the size of site.

- Sites <200 units = 1 outlet (i.e. 35 dpa and up to 50 dpa)
- Sites 200 to 700 units = 2 outlets (i.e. 70 dpa up to 100 dpa)
- Sites 700 units plus = 3 outlets (i.e. 105 dpa 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 of planning status according to planning approval history 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).