

Report of the Director of City Development

Report to: Development Plan Panel

Date: 11th September 2012

Subject: LDF Core Strategy – Publication Draft, Analysis of Consultation Responses: The Housing Requirement (SP6) and Distribution (SP7)

Are specific electoral Wards affected? If relevant, name(s) of Ward(s):	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Are there implications for equality and diversity and cohesion and integration?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Is the decision eligible for Call-In?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Does the report contain confidential or exempt information? If relevant, Access to Information Procedure Rule number: Appendix number:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Summary of main issues

1. The Core Strategy Publication Draft was subject to 6 weeks public consultation during February – April 2012. Section 3 of this report summarises the issues raised and the Tables in Appendices 1a (Policy SP6) and 2a (Policy SP7) suggest how the City Council should respond. Appendix 1b illustrates how the text of Policy SP6 would need to be altered in response to comments on the housing requirement. There are no suggested changes to Policy SP7.
2. It is not considered that there are any issues significant enough to justify major changes.

Recommendations

Development Plan Panel is requested to:

- i). Endorse the analysis of the issues raised and any suggested Core Strategy text changes (as detailed in Appendices 1a, 1b and 2a to the report) for presentation to Executive Board for approval.

1.0 Purpose of this Report

- 1.1 Within the context of the Core Strategy Initial Report of Consultation (6th June), the purpose of this report is to review consultation responses in relation to the housing requirement (Policy SP6) and housing distribution (Policy SP7). The appendices attached, summarise the representations, key issues raised, the City Council's view and proposed action.

2.0 Background Information

- 2.1 Following Consideration by the Development Plan Panel and Executive Board, a 6 week period of public consultation has been undertaken, commencing on 28th February to 12th April 2012. Consistent with the LDF regulations, this is a targeted stage of consultation, with emphasis upon requesting responses in relation to the "soundness" of the plan. Within this context, the consultation material comprised of a range of documents, which were subsequently made available on line or as paper copies, including:

- Core Strategy Publication Draft (Main Document)
- Sustainability Appraisal (& Non Technical Summary)
- Habitats Regulations Assessment Screening
- Equality Impact Assessment Screening
- Draft Infrastructure Delivery Plan
- Draft Core Strategy Monitoring Framework
- Health Topic Paper
- Report of Consultation on Preferred Approach (October – December 2009)

Links were also incorporated to the consultation web pages to the evidence based material, which has been prepared to help inform the emerging document (including the Employment Land Review, Leeds City Centre, Town and Local Centres Study, Housing Growth in Leeds, Strategic Housing Land Availability Assessment, Strategic Housing Market Assessment and the Leeds open space, sport and recreation assessment.

3.0 Main Issues

- 3.1 Strategic Policy SP6 sets out the housing requirement for Leeds including how much land needs to be identified and what criteria are to be used to help identify the land. The housing requirement used to be set by the Regional Spatial Strategy, but it is now incumbent upon Local Authorities to set, based on robust evidence. The following issues were raised:

- i) the scale and justification of the windfall allowance
- ii) accounting for under-provision of housing before the start of the plan period
- iii) planning for an extra "buffer" to the 5 year supply of +5% or +20%
- iv) weaknesses in the underlying evidence
- v) the role of the 20,000 dwellings with outstanding planning permission
- vi) allowance for non-implementation of permissions
- vii) justification for a lower requirement figure during 2012 to 2017
- viii) cross-boundary needs

ix) the merits of the housing land identification criteria

3.2 In support of the overall vision and strategy of the Plan, Policy SP7 provides a steer on the quantity of housing to be planned for at different tiers of the settlement hierarchy and in different geographical areas of Leeds. The main points raised include:

- i) flaws in the geographical boundaries of the Housing Market Characteristic Areas
- ii) lack of evidence to inform the choices of distribution
- iii) sufficiency of housing apportioned to Smaller Settlements and Other Rural areas
- iv) the methodology for distribution
- v) the role of the city centre
- vi) whether “Strategic Sites” should be identified in the Core Strategy
- vii) location specific comments

4.0 Corporate Considerations

As noted above, the Core Strategy forms part of the Local Development Framework and once adopted will form part of the Development Plan for Leeds.

4.1 Consultation and Engagement

4.1.1 As outlined in this report, the Core Strategy Publication draft has been subject to a further 6 week period of consultation. This has been undertaken in accordance with the LDF Regulations and the City Council’s adopted Statement of Community Involvement (SCI).

4.2 Equality and Diversity / Cohesion and Integration

4.2.1 An Equality Impact Assessment Screening was undertaken on the Core Strategy Publication draft, prior to consultation (see Core Strategy Executive Board Report, 10th February 2012). This concluded that equality, diversity, cohesion and integration issues had been embedded as part of the plan’s preparation. For information and comment, the Screening assessment has also been made available as part of the supporting material for the Publication draft consultation. Within this overall context, it will be necessary to continue to have regard to equality and diversity issues, as part of the ongoing process of preparing the Core Strategy, including considering representations and next steps.

4.3 Council Policies and City Priorities

4.3.1 The Core Strategy, plays a key strategic role in taking forward the spatial and land use elements of the Vision for Leeds and the aspiration to the ‘the best city in the UK’. Related to this overarching approach and in meeting a host of social, environmental and economic objectives, where relevant the Core Strategy also seeks to support and advance the implementation of a range of other key City Council and wider partnership documents. These include the Leeds Growth Strategy, the City Priority Plan, the Council Business Plan and the desire to be a ‘child friendly city’.

4.4 Resources and value for money

4.4.1 The DPD is being prepared within the context of the LDF Regulations, statutory requirements and within existing resources.

4.5 Legal Implications, Access to Information and Call In

4.5.1 The DPD is being prepared within the context of the LDF Regulations and statutory requirements. The DPD is a Budgetary and Policy Framework document and as such this report is exempt from call-in by Scrutiny.

4.6 Risk Management

4.6.1 The Core Strategy is being prepared within the context of the LDF Regulations and the need to reflect national planning guidance. The preparation of the plan within the context of ongoing national reform to the planning system and in responding to local issues and priorities, is a challenging process. Consequently, at the appropriate time advice is sought from a number of sources, including legal advice and advice from the Planning Advisory Service and the Planning Inspectorate, as a basis to help manage risk and to keep the process moving forward.

5. Conclusions

5.1 This report provides an overview of the issues raised about Strategic Policies SP6 and SP7 concerning Leeds' housing requirement and distribution. None of the issues are considered significant enough to justify any major changes. The remaining issues warrant only minor changes or no changes at all.

6. Recommendations

6.1 Development Plan Panel is requested to:

i) Endorse the analysis of the issues raised and any suggested Core Strategy text changes (as detailed in Appendices 1a, 1b and 2 to the report) for presentation to Executive Board for approval.

7. Background documents¹

7.1 A substantial number of documents are available representing various stages in preparation of the DPD and the background evidence base and Equalities Impact Assessment Screening. These are all available on the City Council's web site (LDF Core Strategy Pages) web pages or by contacting David Feeney on 247 4539.

¹ The background documents listed in this section are available for inspection on request for a period of four years following the date of the relevant meeting. Accordingly this list does not include documents containing exempt or confidential information, or any published works. Requests to inspect any background documents should be submitted to the report author.

Appendix 1a

Core Strategy Publication Draft - Analysis of Consultation Responses

Policy SP6: The Housing Requirement and Allocation of Housing Land

Representor/Agent	Representor Comments	LCC Initial Response	Action
Windfall Allowance			
<p>Templegate, Hallam Land, Ashdale via Barton Willmore Planning (0057), Home Builders Federation (0092), Caddick Developments, Comforth and Sons, Airebank Developments, Harrow Estates, via White Young Green (0420), Chatford, Taylor Wimpey, Ashdale, Keyland, Warner, Kebbell, Redrow, Miller, Barratt Leeds, Barratt York, Mirfield via Dacre Son and Hartley (0480), Gaunts Ltd via Peacock and Smith (1027), Quod (1091), , TGMF Emsley via ID Planning (1186), Taylor Wimpey via Turley Associates (1743), Redrow Homes (Yorkshire) Ltd (1938), Miller Strategic Land via Spawforths (2663), Spawforths (2663), Evans Homes No2 Ltd via Drivers Jonas Deloitte (5034), Directions Planning (5121), Walton & Co (5510), DPP (5543), Great North Developments Ltd c/o Evans Property Gr, Redrow Homes, Barratt, David Wilson Homes, Great North Developments, East Leeds Extension Northern</p>	<p>- not allowed by NPPF, which says windfall only allowable for 5 year supplies not local plans - 8,000 dwelling allowance not justified by evidence - not positive planning</p> <p>Delete windfall references. Add an acknowledgement that a robustly justified windfall allowance may be considered as part of 5 year supply calculations.</p> <p>500 pa not justified particularly during 1st 5 years (5867)</p>	<p>Allowed by the NPPF? The final NPPF says, “Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends...”</p> <p>The five year supply calculation is integral to the local plan calculation about quantity of housing land that needs to be identified. According to the NPPF (Glossary) “windfall” is land not identified as available in the local plan. Therefore, whatever windfall allowance is concluded as appropriate for a 5 year supply has direct effect on the amount of land that needs to be identified in the local plan. As such the Core Strategy housing supply calculations need to plan for a windfall allowance in order to advise on how much land needs to be identified, and avoid taking land out of the Green Belt that is not required</p> <p>Also, including a windfall allowance in the Core Strategy brings greater transparency and consistency to the process. It provides opportunity for a greater number of local housing interests to be heard. Otherwise, if the windfall allowance was subject to discussion on each planning application there would be far greater change of inconsistency and only partial involvement of different housing interests.</p> <p>Evidence? LCC does have compelling evidence of consistent delivery of</p>	<p>No change.</p>

<p>Quadrant Consortium, Housebuilder Consortium, Robert Ogden Partnership, Edmund Thornhill Estates, Wortlea Estates via ID Planning (5671), The Diocese of Ripon and Leeds, AR Briggs & Co, Ledston Estate, Meadowside Holdings, Bramham Park Estate, Lady Elizabeth Hastings Charity Estate, Hatfield Estate via Carter Jonas (5681), C/o Hileys Solicitors via LDP Planning (5867), Linton Land Owners via Ian Bath Planning (5883), Barratt David Wilson Homes Yorkshire Homes (5895)</p>		<p>windfall sites smaller than the size threshold for inclusion in the SHLAA to justify an allowance of 500 units per annum. This applies just as much during the 2012-17 period.</p> <p>There is also a historic trend of larger windfall sites being delivered in Leeds. However, because that trend was established during a period when policy restricted release of allocated sites, it will not provide reliable evidence to extrapolate a future trend.</p> <p>Positive Planning? Leeds is planning for huge housing growth in all geographies of the city and on different types of land. The quantity of housing planned for is far in excess of actual trends of delivery. The windfall allowance is realistically set based on evidence.</p>	
<p>Banks Development (5036)</p>	<p>The housing provision includes a substantial windfall allowance of 8,000 dwellings. This is described as being conservative but if it is based upon historic levels this should be seen in the context of the prevailing UDP which mainly allocated housing on peripheral sites and left significant opportunities, during a booming market, for proposals to come forward in urban areas. The best opportunities have been taken up or at least permitted and the market has since deteriorated. In these circumstances the windfall allowance is optimistic and should be revised downwards unless the Core Strategy includes the use of PAS sites (see below). Policy H2 would stifle new windfall sites by posing a number of hurdles including accessibility, visual impact, and provision of local services. A more flexible approach to windfall would justify the inclusion of significant numbers in the CS.</p>	<p>The Housing Background Paper examines past trends of windfall development in Leeds and illustrates that the windfall allowance of 500 dwellings per annum is based upon windfall delivery in 2010/11 of 497 dwellings on sites smaller than the size threshold of Leeds' SHLAA. This is a robust conclusion because it ignores much higher levels of windfall development achieved in earlier years and leaves out any allowance for larger sites that the SHLAA is unable to anticipate and identify.</p> <p>The evidence is based on trends of completions rather than permissions so there is no need for a "leakage" or non-delivery allowance.</p> <p>The Inspector at New Forest reached conclusions based on PPS3 national guidance rather than the NPPF which has provision for local authorities to make windfall allowances.</p>	<p>No change</p>
<p>Conservative Group (2950)</p>	<p>Why use a conservative estimate of windfall delivery which seems contrary to past evidence of windfall numbers? The NPPF does not cap the figure allowed to count towards housing numbers.</p>		
<p>Cllr T Ledley (2956), Morley</p>	<p>Doesn't take full account of the scope for counting</p>		

Town Council (4825)	<p>windfall set out in NPPF para 48. Means that calculation of land-take for new housing in CS is unsound.</p> <p>Leeds' windfall target must be revised sharply upwards to reflect what it achieved every year since 1990, particularly since 2000. Following planning permissions granted from 2001-02 onwards, a windfall allowance of 3,000 units a year, or 48,000 over the LDF period, would not be over large and a vast improvement on the 8,000 suggested in CS. To achieve better understanding and reliability of forecasting, there would have to be research into the rates at which permissions on various types of land have been turned into completed units; however, that would be a refinement (4825).</p>		
MFS Land Ltd via Mosaic Town Planning (5672)	<p>Council has not provided 'compelling evidence' to support its windfall allowance of 500 dwellings per annum, as required by the NPPF. In terms of historic performance, the Housing Monitoring Report (September 2011) only includes previous permissions rather than completions and paragraph 4.9 acknowledges that, as windfall schemes are not guaranteed to proceed to development, the rate of actual development has not increased by nearly as much as the stock of permissions. Windfall leakage rates have generally increased since 1994 due to the economic climate. While specific figures are not given for recent years, the report states that there is an average leakage of 11.6% between 1994 and 2008. However, the Core Strategy does not specify any discount on the basis of leakage. In addition, it is now possible to allocate sites for housing based on the SHLAA and employment land review and therefore there will be fewer unidentified sites emerging as windfalls.</p> <p>In other local authorities, Inspectors have found relying on past performance not to be a reliable indicator. Insufficient evidence was presented to the New Forest LDF Core Strategy to justify the inclusion of windfall sites.</p>	<p>The evidence is based on trends of completions rather than permissions so there is no need for a "leakage" or non-delivery allowance.</p> <p>The Inspector at New Forest reached conclusions based on PPS3 national guidance rather than the NPPF which has provision for local authorities to make windfall allowances.</p>	No change

Under-provision before start of CS Plan Period not accounted for			
<p>Templegate, Hallam Land, Ashdale via Barton Willmore Planning (0057), Home Builders Federation (0092) Harrow Estates and Airebank Developments via White Young Green Planning (0420), Savills (0466), Chatford, Taylor Wimpey, Ashdale, Keyland, Warner, Kebbell, Redrow, Miller, Barratt Leeds, Barratt York, Mirfield via Dacre Son and Hartley (0480), Quod (1091), TGMF Emsley via ID Planning (1186), Taylor Wimpey via Turley Associates (1743), Redrow Homes, (Yorkshire) Ltd (1938), Pegasus Planning Group (4388), Evans Homes No2 Ltd via Drivers Jonas Deloitte (5034), Walton & Co (5510), DPP (5543), Great North Developments Ltd c/o Evans Property Gr, Redrow Homes, Barratt, David Wilson Homes, Great North Developments, East Leeds Extension Northern Quadrant Consortium, Housebuilder Consortium, Robert Ogden Partnership, Edmund Thornhill Estates, Wortlea Estates via ID Planning (5671), MFS Land Ltd via Mosaic Town Planning (5672), The Diocese of Ripon and Leeds, AR Briggs & Co, Ledston Estate, Meadowside</p>	<p>The Core Strategy housing requirement should account for years of over/under deliver of housing against the Yorkshire and Humber Plan (RSS) housing requirement in the years preceding introduction of the Core Strategy. Add at least 1,000 dwellings (1743) Add 4,600 dwellings (0057) Add 3,816 or 7,748 if no ceiling (ie no carry-over of 2004-08 surplus) (5543) Add 3,500 dwellings (0092, 1186, 1938, 5671) Add 1,216 dwellings (5672)</p> <p>Undersupply in previous years would need to be factored in to total requirement whether the plan date starts April 2012 or April 2013 (0480)</p>	<p>The under-delivery of 3585 dwellings (2004/05 – 2011/12) against RSS requirements is compensated for by i) rounding up the housing requirement of 70,000 dwellings from the SHMA net housing requirement of 68,286 (Table 6.9) and ii) the over-ambitiousness of the RSS requirements.</p>	<p>No change</p>

Holdings, Bramham Park Estate, Lady Elizabeth Hastings Charity Estate, Hatfield Estate via Carter Jonas (5681), Barratt David Wilson Homes Yorkshire Homes (5895)			
Leeds should plan to meet an extra 20% of its housing requirement			
Caddick Developments via White Young Green (0420), Savills (0466), Quod (1091), Great North Developments Ltd c/o Evans Property Gr via ID Planning (5671), Linton land Owners via Ian Bath Planning (5883)	<p>As a local authority that has not addressed the housing shortfall in recent years, the housing requirement should have a 20% buffer in line with the NPPF</p> <p>This is likely to be necessary for the period to 2014 (5671)</p>	<p>The additions of +5% of +20% apply to the five year supply calculations expected as part of NPPF paragraph 47. It is not appropriate to build these additions into the housing requirement. Rather, they will need to be added to the 5 year supply requirement throughout the plan period</p> <p>Whether Leeds is a +5% or +20% authority is not a matter for the Core Strategy. It may vary during the plan period depending upon Leeds' housing supply delivery performance</p>	No change
Evidence of population and household growth – weaknesses leading to over-estimation and under-estimation of the housing requirement			
Arcadia Group via Montagu Evans LLP (5723)	Support the requirement of 70,000 dwellings	Support welcomed	No change
Templegate, Hallam Land, Ashdale via Barton Willmore Planning (0057), Home Builders Federation (0092), Quod (1027), TGMF Emsley via ID Planning (1186), Redrow Homes (Yorkshire) Ltd (1938), Miller Strategic Land via Spawforths (2663), Spawforths (2663), Pegasus Planning Group (4388), Directions Planning (5121), Walton & Co (5510), DPP (5543), Beterspot Limited via Robert Halstead Chartered Surevior (5649), Great North Developments Ltd c/o Evans Property Gr, Redrow Homes,	<ul style="list-style-type: none"> - Experian Autumn 2011 employment growth forecast indicates higher need for housing (0057) - Overall SHMA conclusions are sound, but it is not appropriate to use the fixed headship sensitivity (0092, 1186, 1938, 5671) - Constrained household formation (young people at home) not a reason for reducing the housing requirement – instead, housing supply needs to be expanded - No account of Government's "NewBuy" mortgage scheme - Viability should never be a constraint to delivery – instead policy requirements that make development unviable should be scaled back - Suppression of headship rates, even though the trajectory is for there to be smaller and smaller households. - The SHMA itself (para 6.57) recognises that this type 	<p>The housing requirement of Policy SP6 draws upon the SHMA 2011 for its evidence. The SHMA 2011 was produced according to the national practice guidance in partnership with local housing interests who did not disagree with the overall methodology or main conclusions.</p> <p>Informed by Dr Peter Boden – a nationally recognised expert on population and demographics - the SHMA was able to correct errors in the 2008 based ONS population forecasts for Leeds. These corrections have been vindicated by the most recent 2010 based ONS population forecasts for Leeds released in 2012; the SHMA adjusted forecasts (migration led) are very close to the 2010 based ONS forecasts. This makes the migration led forecasts of the SHMA a robust and reliable starting point for the further scenario and sensitivity refinements set out in the SHMA. In other words, there is no need to</p>	No change

<p>Barratt, David Wilson Homes, Great North Developments, East Leeds Extension Northern Quadrant Consortium, Housebuilder Consortium, Robert Ogden Partnership, Edmund Thornhill Estates, Wortlea Estates via ID Planning (5671), MFS Land Ltd via Mosaic Town Planning (5672), C/o Hileys Solicitors via LDP Planning (5867), Brownberrie Education Trust via Steven Abbott Associates (5878), Linton land Owners via Ian Bath Planning (5883), Barratt David Wilson Homes Yorkshire Homes (5895), Banks Development (5036)</p>	<p>of testing is "difficult to predict with accuracy" and as such, the 2010-2015 sensitivity should not be carried forward into the SHMA conclusions.</p> <p>Doubt about city centre delivery not a reason to reduce the housing requirement – instead, the Core Strategy should apportion more dwellings to outer areas where market demand is stronger.</p> <p>The SHMA scenarios use the 2008 based population projections rather than the most up-to-date ones (ONS 2010-based Sub-National Population Projections). Also, the robustness of a series of constraints used to reduce the number of dwellings required is questionable. There is a risk (which the SHMA acknowledges) that there will be under-provision that would either suppress household formation (leading to larger household sizes) or force other Local Authority Districts to meet Leeds's housing need. This would be in contravention of the NPPF (1027)</p> <p>Under-provision of housing in Leeds will exacerbate affordability problems for people trying to access housing (5543)</p> <p>Comparison with the RSS is unsound (para 4.6.3). The RSS was based on 2004 projections and is therefore out of date. The most recent population projections should be used (4388, 5543).</p> <p>The SHMA only assesses up to 2026; therefore, the Core Strategy housing requirement lacks evidence for the last two years 2026 – 28 of the plan period. This could seriously underestimate the housing requirement by 9,000 dwellings (5878).</p> <p>Raise the requirement to a single annual figure throughout the plan period: 6000pa (0057) 4680pa + 3% vacancy adjustment (0092) 4539 net, 4925 gross (2663)</p>	<p>re-run the SHMA using ONS 2010 based data.</p> <p>The headship sensitivity accurately reflects the reality of Leeds' stabilisation in the long term trend of smaller households. It is not a policy manufactured constraint; it is a reflection of a real population trend evident in Leeds.</p> <p>Overall it is considered that planning for 70,000 dwellings (net) is appropriate for Leeds. Whilst it is at the lower end of the SHMA forecasts, there is robust evidence to underpin the figure. And it sits within a context of well founded scepticism about the ability of housebuilding rates to step up from low annual delivery rates now to delivery rates higher than have ever been achieved in Leeds.</p> <p>Leeds' SHMA is a technical evidence based document rather than a policy making document. As such, public consultation would be inappropriate for its preparation. Nevertheless, the final SHMA was made available as part of the public consultation on the Core Strategy Publication Draft. It has enabled respondents to see the source of evidence for housing policy and comment not only on the policy but on the evidence too if they so wished.</p>	
<p>A Watson (0043), Oulton Civic Society (0065),</p>	<ul style="list-style-type: none"> - SHMA not subject to public consultation (0043, 4681) - dwelling requirement too ambitious – predicated on 		

<p>Boston Spa PC (0112), Drighlington PC (0136), J Allison (4681), Alexandra Hannant (4688), Mr John Buck (4697) Mr David Klemm (4776), Morley Town Council (4825), SEORA (5053), Mr Paul Evans (5873), Claire Donkin (5893), WARD (Wharfedale & Airedale Review Development) (5852), Michael Green (5863), Paul Evans (5873), Claire Donkin (5893), Zoe Main (5900), Alec Main (5901), Sharron Smith (5902), Nicola McNally (5903), Brendan McNally (5904), Shelagh Connor (5907), Joe & Karen Bentley (5909), Wanda Phillips (5910), Alison Watson (5912), Graham George (5914), Michael Littlewood (5917), Yvonne Smith (5918), Peter Smith (5919), Raymond Georgeson (5922), Peter Knighton (5926) Mark Seghetti (5932), Stephen Seddon (5935), Brian Biss (5938), Lisa Jackson (5885), John Powell (5921), David Ginn (5928), Maria Crosby (5933), Sheila Collins (5934)</p>	<p>continuation of high population growth. Doubtful because:</p> <ul style="list-style-type: none"> - economic uncertainty - low historic delivery rates (only 2,000 dpa since 2000, 2,000 since 2009) – as such, extant planning permissions (20,000) will last until 2022. - requirement inflated by over-conservative windfall and demolition allowances <p>Use up to date measures such as the Census (0112, 5852)</p> <p>Suggested Changes:</p> <ul style="list-style-type: none"> - Review the requirement every 5 years - Control developer land-banking 		
<p>Mr Anthony L Silson (0942)</p>	<p>Release of greenfield and Green Belt land is unsound because fewer dwellings are needed than forecast.</p>		
<p>Conservative Group (2950)</p>	<p>The ONS Sub-National Population Projections 2010-2035 published in February 2012 suggest that Leeds has been basing its housing projections on population estimates that are in fact too high (previously just over 1 million by 2033, now 928,000). Are the housing numbers sound? The housing figures should be revised in accordance with the</p>		

	downwardly revised population projection for Leeds.		
Cllr T Ledley (2956)	CS housing land supply strategy unsound based on inflated estimates of population growth and housing targets derived ultimately from RSS. Means that calculation of land-take for new housing in CS is unsound.		
Taylor Wimpey via Turley Associates (1743)	The support for growth of Leeds Bradford Airport means that more housing land will be needed in locations with easy public transport access to the airport, in accordance with CS Objective 7.	The housing requirement is based on growth anticipated by the Regional Econometric Model. It is not considered that there are any anticipated local economic investments which are of such significance to justify further positive additions to the housing requirement.	No change.
Miller Strategic Land via Spawforths (2663), Spawforths (2663), Pegasus Planning Group (4388)	The housing requirement should be set as a minimum in line with the need to plan for positive growth.	The housing requirement is not set as a ceiling. This is apparent from the inclusion of Policy H2 which allows for housing development – subject to criteria – on unallocated land. Providing the criteria can be met, the housing requirement can be exceeded.	No change.
Pegasus Planning Group (4388)	In terms of the phasing of the housing target, there should be flexibility to allow for improvement of the housing market. Clarifying that the housing requirement is a minimum will help.		
Renew (5105)	It is questionable whether the housing growth targets identified will be achievable. There is some disjunction between the continuing 'preference for brownfield and regeneration sites', the current capacity of the housing market to deliver brownfield development especially to meet the 2012 – 2016 timescale, and the household preference data quoted at 4.6.14 from the SHMA. Will there be a need to review this as the shape of likely future housing market change becomes clearer?	The competing objectives can be married through the phased approach proposed in the CS. Where early phases of land release – which best meet the criteria of Policy H1 – are insufficient to meet needs, further phases can be brought forward to ensure there is always enough housing land. Likewise, the use of the settlement hierarchy and the housing market characteristic areas in Policy SP7 should ensure that all sustainable geographies of Leeds help to provide a varied distribution of new housing to meet the full range of needs and aspirations.	No change
Michael Green (5863)	Lack of evidence that the housing requirement is deliverable in accordance with Core Strategy policy. Lack of means to resolve conflicts.	Deliverability of the housing requirement has been tested using agreed SHLAA delivery forecasts for sites and consideration of other policy objectives and constraints such as need for employment land, flood risk, Green Belt objectives etc. More detail of this testing will be made available for the Core Strategy examination.	No change
Factoring in 20,000 dwellings in outstanding planning permissions (paragraph 4.6.13)			
Oulton Civic Soc (0065) Aberford PC (0106) Boston Spa PC (0112)	Reliance on extant planning permissions in 4.6.13 – not clear how the 20,000 are factored into the requirement or the windfall allowance. Clarify	The reference to 20,000 dwellings in extant planning permissions in paragraph 4.6.13 is relaying a fact: in 2012 Leeds had this number of dwellings in extant planning permissions. These 20,000 dwellings do not form part of the calculation of the housing requirement or the windfall	Add a footnote to explain that the SHLAA is used to determine
Morley Town Council (4825)	Outstanding planning permissions for 20,000 dwellings need to be re-assessed; some might prove unlikely to be		

	implemented, but, if discounted might notionally "free up" land for other development and so could be added back in.	allowance. Neither does the remaining capacity of the UDP allocated sites.	deliverability of extant planning permissions.
Home Builders Federation (0092), Chatford, Taylor Wimpey, Ashdale, Keyland, Warner, Kebbell, Redrow, Miller, Barratt Leeds, Barratt York, Mirfield via Dacre Son and Hartley (0480), TGMF Emsley via ID Planning (1186), Taylor Wimpey via Turley Associates (1743), Redrow Homes (Yorkshire) Ltd (1938), Pegasus Planning Group (4388), Pegasus Planning Group (4388), Walton & Co (5510), Great North Developments Ltd c/o Evans Property Gr, Redrow Homes, Barratt, David Wilson Homes, Great North Developments, East Leeds Extension Northern Quadrant Consortium, Housebuilder Consortium, Robert Ogden Partnership, Edmund Thornhill Estates, Wortlea Estates via ID Planning (5671), C/o Hileys Solicitors via LDP Planning (5867), Linton land Owners via Ian Bath Planning (5883), Barratt David Wilson Homes Yorkshire Homes (5895)	<p>Reliance on 20,000 dwellings in extant planning permissions in 4.6.13 unsound because deliverability not tested. This is expected according to the NPPF paragraph 47.</p> <p>Also unclear how remaining UDP housing allocations (7,500 dwellings) have been factored in. (4388)</p> <p>Use SHLAA as source of supply.</p> <p>Clarify in the text that the Site Allocations DPDs will need to use robust evidence of site deliverability (4388).</p>	<p>The SHLAA is used because it assesses the deliverability of housing as required by the NPPF. Nevertheless, it will be expected that most of the sites to which the 20,000 and 7,500 dwellings relate will be developed during the plan period, although not necessarily during the first 5 years.</p> <p>The CS does not have to offer wording to clarify what national policy expects of future site allocations DPDs.</p>	
Lack of a delivery allowance in the housing requirement of SP6			
MFS Land Ltd via Mosaic Town Planning (5672)	There is no evidence that the housing requirement in SP6 takes into account any discounting such as through a non-implementation allowance for those extant permissions and undelivered allocations. Even where sites are judged to be deliverable, it is unlikely that 100% of the envisaged	The housing requirement should not be increased to take account of any sort of non-implementation allowance. The housing requirement is simply what amount of housing is needed and should not be confused with allowances for supply. There will be scope to factor in	No change

	<p>completions from any source will be achieved, particularly within the five year period.</p>	<p>appropriate supply allowances in the LDF housing supply quantification. For example, the SHLAA should set realistic delivery periods for sites; dwellings forecast for delivery beyond the plan period should not count towards meeting the housing requirement. Delivery constraints also need to be fully accounted for in the Site Allocations DPD.</p>	
<p>Lower annual target for 2012-17 not justified</p>			
<p>Templegate, Hallam Land, Ashdale via Barton Willmore Planning (0057), Home Builders Federation (0092), Savills (0466), Chatford, Taylor Wimpey, Ashdale, Keyland, Warner, Kebbell, Redrow, Miller, Barratt Leeds, Barratt York, Mirfield via Dacre Son and Hartley (0480), TGMF Emsley via ID Planning (1186), Redrow Homes (Yorkshire) Ltd (1938), Miller Strategic Land via Spawforths (2663), Spawforths (2663), Signet Planning (5039), Directions Planning (5121), DPP (5543), Betterspot Limited via Robert Halstead Chartered Surveyor (5649), Great North Developments Ltd c/o Evans Property Gr, Redrow Homes, Barratt, David Wilson Homes, Great North Developments, East Leeds Extension Northern Quadrant Consortium, Housebuilder Consortium, Robert Ogden Partnership, Edmund Thornhill Estates, Wortlea Estates via ID Planning (5671), The Diocese of Ripon</p>	<p>Have a single annual requirement throughout the plan period: 5,943pa net (0057)</p> <p>4,680pa (5681) add 3% vacancy adjustment (0092)</p> <p>The findings of a sound SHMA have been inappropriately transposed to Policy SP6. There is insufficient justification to use the Fixed Headship Rate Sensitivity for the first 5 years, and the SHMA conclusions do not recommend its use. The following requirement should be used, from the SHMA's employment led scenario: 4,539 net add 3% vacancy = 4,675pa net add 250 demolition allowance to 4,925 gross ie 88,650 gross over a plan period of 18 years to 2030 (2663, 0480, 1186, 1938, 5671, 5883)</p> <p>4,700 (5649)</p> <p>Change the requirement figure for the first 5 years to 4,392 (0466)</p> <p>Higher housing delivery rates should be targeted in the first half of the plan period. Even if these are not quite achieved, there will still be the opportunity to catch up in the second half of the plan period (5039).</p> <p>The time period of the sensitivity in the SHMA (2010-15) does not correspond with the period used in the Core Strategy (2013-18)</p>	<p>The Fixed Headship Rate Sensitivity of the SHMA is robust evidence. It is not simply reducing the requirement for the first 5 years because of concerns about mortgage availability and reduced demand. It relies on actual evidence that the long-term trend of smaller household size has stabilised in Leeds. This is suggested to be a result of the housing market choosing not to build smaller flats.</p> <p>Although the SHMA period for the fixed headship sensitivity is 2010-15, relevant circumstances have not changed since the SHMA was prepared. As such, there is no reason why the lower annual target should not be applied from the start of 2012/13 to the end of 2016/17</p>	<p>No change</p>

<p>and Leeds, AR Briggs & Co, Ledston Estate, Meadowside Holdings, Bramham Park Estate, Lady Elizabeth Hastings Charity Estate, Hatfield Estate via Carter Jonas (5681), C/o Hileys Solicitors via LDP Planning (5867), Brownberrie Education Trust via Steven Abbott Associates (5878), Linton land Owners via Ian Bath Planning (5883), Barratt David Wilson Homes Yorkshire Homes (5895), Banks Development (5036)</p>			
<p>Morley Town Council (4825)</p>	<p>A lower target for the first 5 years is not helpful. An LDF requirement for 74,000 dwellings gross from 2012-13 to 2027-28 inclusive means an average of 4625 completions a year for 16 years. Setting a lower target for the early years and a higher for the latter is not helpful, especially if not achieved; it merely makes the maths more confusing. If an average 3000 dwellings a year were completed in the first eight years of the LDF, which seems optimistic, a snowballed deficit would require an annual average of 6250 completions in the second half of the LDF.</p>	<p>Under performance is quite likely in the early years and it is the case that shortfalls will roll-over into later years. Nevertheless it is important that the housing requirement – whilst based on robust evidence of housing need – is set to be as realistic as possible about economic realities. The Core Strategy's use of the SHMA's Headship Sensitivity makes the housing requirement both robust and realistic, and should mean that shortfall roll-overs are minimised.</p>	<p>No change</p>
<p>Renew (5105)</p>	<p>A question arises as to what happens if housing targets for 2012 to 2016 are not met? What level of provision will then be needed from 2017/18? Will there be a need to review this as the shape of likely future housing market change becomes clearer?</p>		
<p>Home Builders Federation (0092)</p>	<p>Lack of a housing trajectory with component supply sources (e.g. from strategic sites, allocations, PAS, green belt etc). Include a housing trajectory with supply sources</p>	<p>The NPPF expects local authorities to illustrate the expected rate of housing delivery through a housing trajectory for the plan period. Leeds has provided a housing trajectory in its Annual Monitoring Reports (AMR) and will continue to do so. The City Council considers that providing a trajectory in the AMR satisfies the expectations of the NPPF. There are good reasons why it is better to set out the housing trajectory in the AMR rather than in the Core Strategy. The biggest problem with inclusion in the Core Strategy is that it will remain</p>	<p>No change.</p>

		fixed at a point in time. In the case of Leeds, it is almost certain that the adoption of the Site Allocations DPD 1-2 years after adoption of the Core Strategy will provide a great deal more certainty about which sites are expected to come forward when and this will undoubtedly change the forward trajectory. It is better that this can be reflected in an annually updated trajectory in the AMR	
Cross boundary needs			
Home Builders Federation (0092)	Under delivery expected in Bradford, Selby, York, Harrogate, (0092)	Adjoining authorities are planning to meet their needs based on local evidence. Because their strategies will be subject to public examination, LCC is not expecting to have to meet extra housing from neighbouring authorities. However, LCC is in regular dialogue with its neighbours to understand likely eventualities in case more/less housing does have to be planned for. Regarding housing apportionment in the sub-region, Leeds is planning for housing growth that is aligned with economic growth. The SHMA forecasts are based on the Regional Econometric Model's (REM) forecasts for employment growth which anticipate Leeds' continuing role as the main employment centre in the City Region.	No change
C/o Hileys Solicitors via LDP Planning (5867)	Under delivery expected in Bradford, Selby, York and Kirklees		
Walton & Co (5510)	Lack of provision to meet needs of neighbouring authorities means that Leeds has failed in its Duty to Cooperate		
Quod (1027)	Under-provision in Leeds caused by the SHMA underestimating housing need will force adjoining authorities to meet Leeds' need.		
North Yorkshire County Council (2613)	<p>The proposals for housing growth fail to make appropriate housing provision in Leeds, both in terms of the scale the type and location of development. This will place increased pressure on adjoining authorities to release land and unsustainable commuting patterns with limited opportunities for the use of public transport and re-use of brownfield land. It will require significant investment in infrastructure and have adverse effects on the character and setting of rural communities.</p> <p>This issue was fully addressed in the former RSS which focused growth and regeneration on the main urban areas such as Leeds, while restraining the dispersal of development in the rural areas. The County Council is concerned that the Core Strategy could reverse this previously agreed regional approach to development. The principles in para 4.6.2 need to reflect the strategic/ sub-regional aspects of housing need in setting Leeds' housing requirement. The link needs to be strengthened between Economic/employment growth and residential development and the scale and distribution of housing growth proposed in the Core Strategy must be able to meet future demands arising from long term economic</p>		

	growth in Leeds without placing the onus on adjoining authorities to accommodate development in less sustainable locations.		
Craven District Council (5888)	In relation to the spatial policies in the document, CDC Officers support Spatial Policy 6 in planning to accommodate new (net) housing to meet needs arising in the conurbation and therefore address outward migration and commuting pressures.		
Land identification criteria			
Directions Planning (5121)	We generally support the guiding principles for the allocation of land, but they should not be applied sequentially.	The criteria are all important. The plan does not say they are to be applied sequentially. It is intuitive to expect sites to be identified against all of the criteria	No change
Arcadia Group via Montagu Evans LLP (5723)	Support the criteria of Policy SP6	Support welcomed	No change
Chatford, Taylor Wimpey, Ashdale, Keyland, Warner, Kebbell, Redrow, Miller, Barratt Leeds, Barratt York, Mirfield via Dacre Son and Hartley (0480), TGMF Emsley via ID Planning (1186), Redrow Homes (Yorkshire) Ltd (1938), Great North Developments Ltd c/o Evans Property Gr, Redrow Homes, Barratt, David Wilson Homes, Great North Developments, East Leeds Extension Northern Quadrant Consortium, Housebuilder Consortium, Robert Ogden Partnership, Edmund Thornhill Estates, Wortlea Estates via ID Planning (5671), Barratt David Wilson Homes Yorkshire Homes (5895)	<p>NPPF does not support giving <i>preference</i> to brownfield and regeneration sites.</p> <p>Suggest splitting criterion ii) into two separate criteria which would give <i>encouragement</i> rather than <i>preference</i>:</p> <p>ii) Encouraging the effective use of brownfield land by reusing land that has been previously developed,</p> <p>iii) Encouraging and supporting Regeneration Priority and Growth Areas,</p>	<p>LCC has a preference for using making best use of PDL and regeneration areas in planning for housing growth. There is no conflict with the NPPF in Leeds seeking to identify housing land with such a preference. This is one way in which the “encouragement” referred to in the NPPF can be put into practice. Such a preference should not be confused with any intention to constrain release of deliverable sites below what is necessary to meet the housing requirement, which would be contrary to the NPPF.</p> <p>It should also be noted that the NPPF para 17 bullet 5 seeks to promote “...the vitality of our main urban areas...” and bullet 7 advises that “allocations of land for development should prefer land of lesser environmental value...”. Policy SP6’s preference for PDL and regeneration areas will help to support the vitality of the main urban area of Leeds and is likely to result in use of land of a lesser environmental value being used in the first instance.</p>	No change
Directions Planning (5121)	There should be no preference to brownfield and regeneration sites. Instead, a holistic approach should make use of sites in all sustainable locations that are suitable, available and achievable.	The NPPF is clear in para 22 that employment sites should not be protected where there is no reasonable prospect of demand for that use. The Core Strategy takes a balanced approach to the needs of both housing	No change

	<p>The preference for brownfield land will have two consequences that need to be considered. Firstly, employment sites will be lost, to the detriment of areas like the Leeds Road (A660) corridor in Otley. Such losses need to be properly considered in the SHLAA and Employment Land Review.</p> <p>Secondly, a preference to brownfield in the Core Strategy would mean that Neighbourhood Plans would be forced to follow suit to ensure conformity.</p>	<p>and employment, with a recognition in Policy EC3 that some areas identified in the ELR – including Otley in the Outer North West – need greater protection of employment land.</p> <p>It is considered appropriate that the Core Strategy's vision and most of its strategic principles, objectives and policies, having been tested through examination, will be “sound” and helpful for the long term planning of Leeds, and that it will be sensible for Neighbourhood Plans to adhere to them. Neighbourhood Plans are required to conform to the adopted plans of their respective local authorities. If Policy SP6's preference for PDL and regeneration areas are adopted it is right that the same preference should form the context for Neighbourhood Plans in Leeds.</p>	
Yorkshire Wildlife Trust (2391)	The NPPF (para 17) qualifies its encouragement for brownfield land with the proviso “...that it is not of high environmental value”. This proviso should be added to criterion ii).	The criteria of Policy SP6 are not set out in sequential priority; they all apply equally. This means that criterion vi concerning impacts on environmental features would also need to be considered for all sites, brownfield and greenfield. Hence, there is no need to add a proviso to criterion ii).	No change
Leeds Civic Trust (0062) Aberford PC (0106) Boston Spa PC (0112) Drighlington PC (0136), Gareth Brown (3410), Miss Joanne Coultas (3995), Mark Seghetti (5932)	Weak preference in SP6 for brownfield development Strengthen SP6 Brownfield sites should be used before green sites rather than 1st preference (3410, 3995)	The stance toward brownfield sites in Policy SP6 is as strong as it can be in the context of the NPPF. A sequential preference for brownfield land (ie not allowing any greenfield development whilst any deliverable brownfield sites are available) would be contrary to the NPPF because it would restrict supply from meeting needs.	No change
MFS Land Ltd via Mosaic Town Planning (5672), Linton land Owners via Ian Bath Planning (5883)	Policy SP6 criteria should acknowledge the role of PAS land as one of the prime sources for housing allocations. PAS land can better meet the need for family housing than infill and urban sites. PAS land is acknowledged by the NPPF to have a role in supplying long term housing needs. PAS land should be given priority over Green Belt releases. The last sentence of paragraph 4.6.9 is misleading in suggesting that Green Belt land release is the only alternative to windfall. PAS sites have already been sustainability assessed through the UDP Review (5883)	Agree that the last sentence of paragraph 4.6.9 is misleading.	Minor change. Add “Once PAS land and UDPR allocations have been accounted for...” to the beginning of the last sentence of Paragraph 4.6.9

Caddick Developments and D Westwood & Son via White Young Green (0420)	SP6 iii should recognize that some GB sites can perform well in their sustainability credentials and, as part of a review of the green belt, can add to the delivery of new homes.	Other policies of the Core Strategy including SP1 and SP10 set out criteria for assessing sustainability and appropriateness of Green Belt land for housing.	No change
Evans Homes No2 Ltd via Drivers Jonas Deloitte (5034)	Full review of the GB is essential part of the evidence based to establish the parameters for the allocation of sites in sustainable locations through the forthcoming Site allocations DPD.	Selective Green Belt Review will be undertaken related to the Settlement Hierarchy to inform the Site Allocations DPD	No change
Mr Anthony L Silson (0942)	Release of greenfield and Green Belt land is unsound because developers will prefer to build on the green sites first negating the policy of prioritising brownfield sites. Keep all Green Belt and Greenfield sites, including the green infrastructure	The Core Strategy aims to make the best use of urban, brownfield and regeneration sites so that the use of countryside, including Green Belt land, is minimised. Nevertheless, the housing need in Leeds is so great that some Green Belt land will be needed. This means that, based on assessment, some land will be taken out of the Green Belt through the plan making process to allow for development. This is consistent with NPPF paras 83-85. The NPPF continues to protect land that is Green Belt from inappropriate development, which may account for national government statements to this effect.	No change
Mr Anthony L Silson (0942)	Release of greenfield and Green Belt land is unsound because priority to development of green sites near settlements is contradictory as the very places where Green Belt/fields are essential are close to settlements. Also, it is contradictory to identify Green Belt land as protected but then release some for development. CHANGES Keep all Green Belt and Greenfield sites, including the green infrastructure		
Lisa Fox (5880)	The strategy to use Green Belt land for housing is at odds with national government and local MP statements to protect it.		
Environment Agency (0046)	Criterion vii of SP6 does not state clearly that a flood risk sequential test is necessary for sites in high flood zones Link to Policy SP1 regarding flood risk	Policy EN5 will ensure that all proposed housing development will be subject to flood risk sequential testing in accordance with national guidance. There is no need for the provisions of Policy EN5 to be repeated in Policy SP6.	No change
Signet Planning (5039)	There is a need to adopt a sequential approach to determining the most suitable locations for housing development to ensure housing is directed to areas at the lowest risk of flooding.	A sequential approach is required for all sites by Policy EN5	No change
Leeds Civic Trust (0062)	Weak preference in SP6 for protecting green infrastructure and natural habitats Strengthen SP6	Criterion vi) will ensure that site selection avoids the choice of sites with valued environmental characteristics when alternatives are available	No change
English Heritage (0099)	Policy SP6 (iv): to safeguard those elements which contribute to the distinct identity of the District, this criterion should not only seek to "enhance" the identity of	Agree	Minor change. Amend to read:- "Opportunities to

	<p>existing neighbourhoods but also to “reinforce” those elements which contribute to their distinctive character.</p> <p>Policy SP6 (iv) amend to read:- “Opportunities to reinforce or enhance the distinctiveness..”</p>		reinforce or enhance the distinctiveness..”
Micklefield PC (0118)	<p>Criterion i) of SP6 includes three criteria. This means that a location with good public transport accessibility but totally lacking of local facilities – like Micklefield – might be favoured. Both parts need to apply in order to ensure that the concept of sustainable settlements, and the realistic distance for which people will walk to local facilities and key services within those settlements, is embedded in Spatial Policy 6. Divide criterion i) into three:</p> <p>(i) preference for sustainable locations within 1200m of an existing core of local facilities and key services,</p> <p>(ii) where a smaller settlement does not have an existing core of local facilities and key services, any new housing allocations proposed as extensions to that settlement will only be promoted in the site allocations DPD if a core of local facilities and key services is created as an integral component of the housing development,</p> <p>(iii) adequate standards of public transport accessibility - see the well connected city chapter, sub clause (ii)</p>	<p>The elements of criterion i) are consistent. As written, the criterion will expect both public transport accessibility and access to local facilities and services. If the latter do not exist, they can be provided by the housing development.</p>	No change
TGMF Emsley via ID Planning (1186), Great North Developments Ltd c/o Evans Property Gr, Redrow Homes, Barratt, David Wilson Homes, Great North Developments, East Leeds Extension Northern Quadrant Consortium, Housebuilder Consortium, Robert Ogden Partnership, Edmund Thornhill Estates, Wortlea Estates via ID Planning (5671)	<p>The Core Strategy should confirm that the remaining undeveloped UDP allocated housing sites should be carried forward into the LDF and not be subject to phasing</p>	<p>Paragraph 5.2.3 makes clear that outstanding UDP housing allocations will not be subject to phasing under Policy H1</p>	No change
Yvonne Smith (5918), John Powell (5921), David Ginn (5928), Maria Crosby (5933), Sheila Collins (5934)	<p>The remaining UDP allocated housing sites should be subject to sustainability assessment to ensure that only those in sustainable locations are carried forward.</p>	<p>The UDP allocated housing sites are too far advanced through the planning process to be reviewed now, and have already been subject to thorough assessment through the UDP Review Examination process.</p>	No change

Gaunts Ltd via Peacock and Smith (1027)	Should also include a policy to identify land allocated as PAS.	Policy SP10 deals with provision of new PAS. Actual land designation will be made through Site Allocations DPDs	No Change
Stuart Andrew (0165)	Areas that have shouldered considerable housing growth in the past – like Guiseley, Yeadon, Rawdon, Farsley and Pudsey – should not have to accommodate so much. Reduce the housing requirement	Past provision of housing is not a reliable indicator of whether geographical areas are suited or are capable of hosting further growth. An evidence based holistic assessment of a range of factors is necessary to make those judgements.	No change
PPL via Scott Wilson (0414)	Clarity on the process for the adoption Neighbourhood Plans and timescales for this to happen	Timescales for neighbourhood plan preparation are set out in LCC's guidance note available on LCC website. It is not necessary for this to be set out in the Core Strategy	No change.
Mark Seghetti	The priority must be to build affordable homes on brownfield sites.	In line with Policy H5, affordable housing will be sought on all sites based on need and consideration of viability	No change

The following respondents have all raised matters under the heading of Policy SP6 which have not been addressed here because they better relate to issues addressed under Policy SP7:

Home Builders Federation (0092), PPL via Scott Wilson (0414), Airebank Developments, D Westwood & Son, Rockspring Hanover Property Unit Trust and Harrow Estates via WYG (0420), C/o Hileys Solicitors via LDP Planning (5867), Caddick Developments, Cornforth via White Young Green (0420), Quod (1091), Comforth and Sons and MFS Land Ltd via Mosaic Town Planning (5672), Chatford, Taylor Wimpey, Ashdale, Keyland, Warner, Kebbell, Redrow, Miller, Barratt Leeds, Barratt York, Mirfield via Dacre Son and Hartley (0480), Redrow Homes (Yorkshire) Ltd (1938), Barratt David Wilson Homes Yorkshire Homes (5895), Linton land Owners via Ian Bath Planning (5883), Morley Town Council (4825), Miller Strategic Land via Spawforths (2663), Great North Developments Ltd c/o Evans Property Gr, Redrow Homes, Barratt, David Wilson Homes, Great North Developments, East Leeds Extension Northern Quadrant Consortium, Housebuilder Consortium, Robert Ogden Partnership, Edmund Thornhill Estates, Wortlea Estates via ID Planning (5671), Michael Green (5863), The Diocese of Ripon and Leeds, AR Briggs & Co, Ledston Estate, Meadowside Holdings, Bramham Park Estate, Lady Elizabeth Hastings Charity Estate, Hatfield Estate via Carter Jonas (5681), Betterspot Limited via Robert Halstead Chartered Surevior (5649), A Watson (0043), J Allison (4681), Miss Alexandra Hannant (4688), Mr John Buck (4697), Mr David Klemm (4776), SEORA (5053), Mr Paul Evans (5873), Claire Donkin (5893), Michael Green (5863), Signet Planning (5039), McGregor Brothers Ltd via West Waddy ADP (5884), Pegasus Planning Group (4388), Mr M Dunstall (4743), Mrs Lisa Jackson (5885), P & K Cook (5899), Andrew Hepworth (5864), Taylor Wimpey via Turley Associates (1743), Mr Cedric Wilks (4783), WARD (Wharfedale & Airedale Review Development) (5852), Martin Gostling (5872), Susan Kelly (5870), Flora Pearson (5931), Oulton Civic Society (0065), Micklefield Parish Council (0122), A Watson (0043), J Allison (4681), Miss Alexandra Hannant (4688), Mr John Buck (4697), Mr David Klemm (4776), SEORA (5053 and 5940), Mr Paul Evans (5873), Claire Donkin (5893), Zoe Main (5900), Alec Main (5901), Sharron Smith (5902), Nicola McNally (5903), Brendan McNally (5904), Shelagh Connor (5907), Joe & Karen Bentley (5909), Wanda Phillips (5910), Alison Watson (5912), Yvonne Smith (5918), John Powell (5921), David Ginn (5928), Maria Crosby (5933), Sheila Collins (5934), Sandra Biss (5936), Karl Prime (5937), Mrs Deborah Biss (5939), Lisa Fox (5880)

APPENDIX 1B: CHANGES TO POLICY SP6

4.6 Housing Development

4.6.1 As highlighted in Section 2 (Profile of Leeds district), it is anticipated that the population of Leeds will rise from 755,136 in 2010 to 860, 618 in 2028. This raises major challenges for Leeds in seeking to meet the complex demographic needs of the existing population, together with the implications of an aging and growing population over the Plan period. It is important that planning for such growth forms part of an overall strategy, which gives emphasis not only to a sufficient housing land supply in appropriate locations but also the quality, type and affordability of homes in meeting local needs. This needs to be achieved within an overall framework, which gives priority to delivering sustainable development, promoting regeneration and job growth, whilst maintaining local character, distinctiveness and environmental quality. As a basis to help plan for this growth, the following key principles have been shaped and agreed through consultation (informal consultation into housing growth summer 2011) with key stakeholders, including communities and the development industry.

Housing growth principles

- 4.6.2 Within this context, the following Housing growth principles have been established.
- i) Ensure housing growth is linked to the creation of sustainable neighbourhoods throughout the city (see Spatial Policy 1)
 - ii) Set a realistic and phased target for the delivery of new homes (see Spatial Policy 6)
 - iii) Ensure housing growth targets reflect local housing needs, now and in the future, in terms of tenure, type and size, (see Spatial Policy 6 and Policy H4)
 - iv) Enhance the distinctiveness of existing neighbourhoods and quality of life of local communities through the design and standard of new homes (see Policies P10 & EN2),
 - v) Facilitate the development of brownfield and regeneration sites, (see Spatial Policies 1, 3 and 6)
 - vi) Agree a range of mechanisms to deliver additional affordable homes, (see Policy H5)
 - vii) Work in partnership to find ways to facilitate housing growth (see Section 6 Implementation & Delivery).
- 4.6.3 Within the context of evidence derived from the Strategic Housing Market Assessment (2011) and informed by the above considerations, a housing requirement of 70,000 new homes net has been set, as a basis to meet the housing demands and job growth aspirations of the City. This figure is broadly consistent with the Regional Spatial Strategy. A demolition allowance of 250 units/annum has been applied, which is higher than the average rate of demolition since 2004 (228 units). To account for demolitions, the gross housing requirement is 74,000 units. In the delivery of the above housing growth principles and within the context of current economic uncertainties and the fragile nature of the housing market, the delivery these requirements as part of an overall strategy, will need to be closely monitored.
- 4.6.4 Within this context, the Plan does allow for a number of contingencies. As set out below, based on historic performance and anticipated future potential, the role of

windfall development is recognised as an important component of supply. A windfall allowance is therefore set (see below). The figures presented are however conservative estimates and it is therefore highly likely that future windfall delivery will be in excess of the proposed figure. As part of an overall strategy, through Spatial Policy 1, emphasis is placed upon the role of the Main Urban Area and Settlement Hierarchy as a focus for delivery in sustainable locations. Linked to this, Spatial Policy 6, sets out an overall housing requirement (derived from the SHMA). Based on local evidence, this overall scale is considered to be realistic and appropriate to circumstances within Leeds. Within this context, Spatial Policy 7, identifies an indicative scale and distribution of growth, informed by the (SHMA and SHLAA), to provide a framework for more detailed site identification through the preparation of the Site Allocations DPD (and Are Valley Area Action Plan). In planning for longer term growth, Spatial Policy 10 provides the basis for a selective Green Belt review.

- 4.6.5 Current economic and housing market conditions are such, that the Core Strategy needs to have sufficient range and flexibility in its approach, to deliver the intended Objectives (as already set out in Section 3). In conjunction with the Core Strategy, the preparation of allocations DPDs (see above) is underway and a monitoring framework (see Background paper) is being developed to track progress and will be used as a basis to identify any which may result from unforeseen circumstances.
- 4.6.6 The commencement date for the housing requirement is 2012/13 to tie-in with the likely adoption date of the plan. Given the depressed state of the housing market over recent years, no calculation has been made of over or under-supply against targets in the Regional Spatial Strategy. The start of the housing requirement at 2012/13 marks a clean break from the past.
- 4.6.7 The housing figure is to be provided in stages, as part of a phased approach, increasing over the life time of the Plan. The Council has taken this course of action because the current economic climate has impacted on a range of factors, which have in turn frustrated recent housing delivery. These factors include:
- The current fragility of the housing market and the dramatic reduction in completion rates when compared to the 10 year average of 3,000 dwellings per year from 2000 – 2010 (and 2,000 from 2009 – 2011),
 - The availability and affordability of mortgage finance,
 - The affordability of new housing stock in meeting local needs,
 - Rates of household formation,
 - Uncertainties regarding the rate of economic recovery and growth and the impact of this upon, job retention and creation,
 - The availability of funding to deliver infrastructure requirements associated with new development.
- 4.6.8 As a large post industrial city which has experienced continual urban regeneration and renaissance, Leeds has continued to evolve in terms of its economic diversity and formats for housing delivery. A major aspect of this process has been the recycling of brownfield (previously developed land – PDL), for windfall housing and other uses. Leeds has a long and well recorded history of windfall housing being delivered as a source of land for development. This has been continuously monitored by the City Council since the 1980s.

- 4.6.9 In terms of housing land monitoring and the analysis of housing land availability, the City Council regularly updates the position as part of the Strategic Housing Land Availability (SHLAA) Partnership. Within this context, windfall is still recognised as a key component of housing land supply. Based upon past performance and the continued needs for urban renewal and regeneration of Leeds, windfall will continue to play an important role in housing delivery. This is due in part to the scale of the district in respect of the extent of the Main Urban Area of Leeds and large collection of settlements across the district (including Major and Small Settlements identified as part of the Settlement Hierarchy – see Table 1: Identification of Settlement Types). Consequently, the role of windfall and the identification of a windfall allowance, is integral to the overall housing strategy set out in this Plan. This is a factor recognised in RSS. Windfall predominantly occurs in urban locations and is therefore consistent with the objectives of the Core Strategy. *Once PAS land and UDPR allocations have been accounted for* the only alternative to windfall is further Green Belt release .
- 4.6.10 The windfall allowance for Leeds is based upon two components of windfall. First of all, it enables sites not assessed by the SHLAA partnership (due to their size or the timing of their delivery) to be considered as part of overall housing delivery. The allowance also takes into account the fact that not all sites which will deliver housing over the Plan period have been identified at the start of the period.
- 4.6.11 In order to reflect the future contribution that windfall will make based on historical performance and as a basis to harness the expected future potential of PDL windfall development, the Core Strategy incorporates an allowance of 500 units/annum for windfall. Such delivery has a critical role to play in contributing to housing need and in meeting development aspirations in sustainable locations. As demonstrated by monitoring evidence, this figure is considered to be an extremely conservative estimate and is therefore an appropriate figure when it comes to a contribution to overall supply. Therefore the Core Strategy anticipates that 8000 units of the 74,000 gross units required will be delivered via windfall. This means that 66,000 units will need to be identified to ensure delivery of the Core Strategy.
- 4.6.12 Evidence from the SHMA (2011) suggests that the long term trend toward smaller households will continue to level off beyond 2011. Therefore, Leeds considers it is sensible to plan for a static rate of household formation change during the first 5 years of the Core Strategy, returning to the SHMA's employment led forecast thereafter. Consequently, Spatial Policy 6, is subdivided into two time periods (2012 – 2017/18 and 2017/18 – 2028) to reflect the implications of this evidence. Taking into account changing levels of provision, demolitions, and the role of windfall, Leeds will seek to identify 66,000 units for housing delivery over the lifetime of the Core Strategy.
- 4.6.13 The 66,000 units that will be identified will be composed of current, undelivered allocations (7500 units), extant planning permissions (20,000 units)² and other sites which are deemed to be appropriate for housing delivery, as per the guidelines in Spatial Policy 6 (Figures as at 31 March 2011).

² the SHLAA is used to determine deliverability of all extant planning permissions.

SPATIAL POLICY 6: THE HOUSING REQUIREMENT AND ALLOCATION OF HOUSING LAND

70,000 (net) new dwellings net between 2012 and 2028 will be accommodated at a rate of:

- 3,660 per annum from 2012/13 to the end of 2016/17 (18,300)
- 4,700 per annum from 2017/18 (51,700)

Delivery of 500 dwellings per annum (8,000 over the plan period) is anticipated on small and unidentified sites.

Guided by the Settlement Hierarchy, the Council will identify 66,000 dwellings gross (62,000 net) to achieve the distribution in tables H2 and H3 in Spatial Policy 7 using the following considerations:

- i) Sustainable locations (which meet standards of public transport accessibility -see the Well Connected City chapter), supported by existing or access to new local facilities and services,
- ii) Preference for brownfield and regeneration sites,
- iii) The least impact on Green Belt purposes,
- iv) Opportunities to *reinforce or* enhance the distinctiveness of existing neighbourhoods and quality of life of local communities through the design and standard of new homes,
- v) The need for realistic lead-in-times and build-out-rates for housing construction,
- vi) The least negative and most positive impacts on green infrastructure, green corridors, greenspace and nature conservation,
- vii) Generally avoiding or mitigating areas of flood risk.

APPENDIX 2A

Core Strategy Publication Draft - Analysis of Consultation Responses

Policy SP7: Distribution of Housing Land and Allocations

Representor/Agent	Representor Comments	LCC Initial Response	Action
Apportionment to Housing Market Characteristic Areas – General Comments			
Geography of Housing Market Characteristic Areas			
Morley Town Council (4825)	Not at all clear how "Outer South West", which includes the former Borough of Morley, also includes Middleton, but, not Belle Isle, and takes in a small part of Farnley, but, not all of it. A more coherent HMCA would be made up of the former Borough of Morley and the former Rothwell Urban District, most of which is now in HMCA "Outer South". Contrived HMCAs cannot be helpful to understanding, and must be unsound.	The geography of Housing Market Characteristic Areas (HMCA) are derived from the SHMA 2011. Estate Agents provided a set of areas which reflect where people looking to buy houses tend to focus their searches. The boundaries were refined to reflect boundaries of affordable housing policy zones and to accord with census output areas. As such there is a sound evidence base to support the HMCA geographies.	No change
Linton land Owners via Ian Bath Planning (5883)	Linton should be included as a Small Settlement either independently or with Collingham, and its proximity to the principal/major settlement of Wetherby should be acknowledged.	The smaller settlements were identified on the basis of having at least a population of 1,500, a primary school and a convenience store or pub. With a population of half 1,500 (2001) and neither a school or a convenience store, Linton was not considered sufficiently sustainable. It is a separate settlement from Collingham and it would be artificial to combine them for the purposes of the Settlement Hierarchy.	No change
Rockspring Hanover Property Unit Trust, Harrow Estates via White Young Green (0420)	Map 8 - Distribution of new housing by HMCA % does not specifically reflect Table 3 of the written text in that the key to the diagram identifies the percentages with a + (eg 5%+). The table is however specific in % given. The Map should be specific for each of the characteristic area in order to avoid confusion of interpretation. There are also needs to be greater clarity in the key to Map 8 between the colouring for the 3- 5% bands.	The map is indicative of the relative quantities of housing that the different areas are expected to accommodate. It is acceptable for percentage quantities to be banded in order to provide a simple impression of the relative quantum.	No change
Oulton Civic Society (0065), Mickfield Parish Council (122)	Key Diagram symbols and tables 2 and 3 do not give sufficient local specificity	The Key Diagram and Tables 2 and 3 give an appropriate level of specificity to deliver a sustainable and balanced pattern of growth for the Leeds District. The Site Allocations DPD will offer further choices for the pattern of individual sites within each Housing Market Characteristic Area.	No change

Lack of Assessment/Evidence to Inform the Housing Distribution Tables			
Harrow Estates via White Young Green (0420)	Concerned SP7 is reliant on urban extensions without having carried out or informed by the review of the GB required by SP10.	Some Green Belt land take will be necessary to meet housing needs, but the Core Strategy does not need to be specific about the location of urban extensions; these choices will be made by the Site Allocations DPD informed by a GB Review	No change
Environment Agency (0046)	Lack of evidence that flood risk sequential test has been applied to the distribution of housing land and allocations. We understand that this work is being undertaken by the Council and welcome the opportunity to comment on this prior to formal submission of the DPD. This will work will also need to apply to provisions for all development types where broad locations for development are referred to within the DPD.	Drawing from evidence of the SHLAA, the City Council is satisfied that a palette of housing sites are deliverable which meet the housing requirement without relying upon land in high flood risk zones, unless there are insufficient sequentially preferable alternatives in the locality	No change
Highways Agency (0060)	<p>The scale of development in a number of areas of the District is of concern to the Agency because of the potential traffic impact on the Strategic Road Network:</p> <ul style="list-style-type: none"> •Leeds city centre 10,200 new homes. •East Leeds – 11,400 homes. •Inner Leeds– 10,000 homes. •Outer South West area 7,200 homes. •Outer North East area 5,000 homes. •Outer West area 4,700 homes. •Outer South East area 4,600 homes. <p>The number of new homes quoted in the Policy for the rural Outer North East Area seems high – we would welcome clarification of the development areas that are included.</p> <p>It will be necessary for the Agency to assess the output of current work on updating its traffic models and analysing the findings in order to form a clear view on the likely traffic impact on the Strategic Road Network in future years of these development proposals. Those outputs are expected to become available during Summer 2012 and will enable the Agency to determine if and where physical mitigation measures might be needed to provide additional capacity on the Strategic Road Network or whether there are any situations where it is not possible to provide the additional capacity. The output from this exercise will also provide inputs to the Infrastructure Schedule in the Infrastructure Delivery Plan. There is evidence already available from the Agency in</p>	Leeds City Council is currently working with the Highways Agency and its consultants to assess the impact of the Core Strategy on the Strategic Road Network. This work will provide a more detailed examination of the impacts than has been possible to date. The intention is to reach an agreed position on the impacts and agree appropriate mitigation where necessary.	No change

	<p>the form of forecast future year traffic flows on the Strategic Road Network in West Yorkshire derived from the existing Network Analysis Tool (NAT). The Agency has used this to model proposed housing and employment growth with the outcome that excessive demands will be placed on certain parts of the motorway network during the plan period.</p> <p>The Agency finds this part of the Plan unsound but we will work with Leeds Council with the objective of resolving outstanding matters and thereby enabling the Agency to declare the Core Strategy sound in this particular respect. The Agency's overall position needs to be reserved at least until the results of current traffic modelling work becomes available until June 2012 after which it will be possible to determine where and if physical capacity enhancement is available on the Strategic Road Network at a cost that is affordable and where and if there are any locations where there is no solution.</p>		
Housing Development in "other" and smaller settlements			
PPL via Scott Wilson (0414)	<p>The Core Strategy lacks clarity on how it treats housing development in locations outside of the settlement hierarchy. In setting out the spatial development strategy, para 4.1.15 restricts development to that that functionally requires a rural location. However, para 4.6.1 supporting Policy SP6 appears to offer encouragement for development opportunities outside of the settlement hierarchy. Also, part of Policy SP10 (Green Belt) says that sites may be considered in relation to other settlements where they are in sustainable locations with access to local services and where sites are more appropriate in meeting spatial objectives than sites in higher order settlements.</p> <p>The CS should set out clearer criteria for housing development in "other settlements"</p>	<p>Para 4.6.1 actually emphasises that quality, maintenance of local character and distinctiveness have to be achieved as well as delivering the housing requirement to an overall sustainable spatial strategy.</p> <p>Policy SP10 states that use of other settlements (ie outside of the settlement hierarchy) should only be considered exceptionally.</p> <p>Policy H2 would also cover proposals on non-allocated sites in "other settlements" and sets appropriate criteria for the size of development relative to local infrastructure and transport accessibility</p> <p>It is considered that the plan provides sufficient criteria both for Green Belt Land (which would be considered through the plan making process) in Policy SP10 and for non-Green Belt and non-allocated land through Policy H2</p>	No change.
D Westwood & Son via White Young Green (0420)	<p>Only 600 dwellings apportioned to "other" settlements. Where sites are available in sustainable locations outside the Major and Smaller settlements in the Settlement Hierarchy, such sites should be considered favourably to assist in the delivery of housing. The pressure for housing development in Outer</p>	<p>The 600 dwellings or 1% of the total in "other" settlements is a guide figure and is not prescriptive</p>	

	South West should justify more development there outside of the settlement hierarchy.		
Linton land Owners via Ian Bath Planning (5883)	Apportionment of only 1% to the Other Rural category is too low, particularly in the Outer North East		
Rockspring Hanover Property Unit Trust, Harrow Estates via White Young Green (0420)	Table 2 should quantify supply from outside the settlement hierarchy which can be in sustainable locations, particularly as the City Council is making a significant windfall allowance. Thorp Arch is an example of a sustainable location – an existing employment hub - outside of the settlement hierarchy	The “Other rural” category of Table 2 sets an expectation for 600 dwellings outside of the settlement hierarchy. Tables 2 and 3 exclude delivery through windfall development. Paragraph 4.6.18 notes that other exceptional sustainable locations, such as Thorp Arch, can be considered. Thorp Arch is also shown on the Key Diagram as an opportunity for brownfield residential development	No change
Linton land Owners via Ian Bath Planning (5883)	Apportionment of only 8% to the Smaller Settlements is too low, particularly in the Outer North East area. Smaller settlements are sustainable enough to warrant a higher proportion.	The 8% to the Smaller Settlements applies city wide; it is not necessary for each HMCA to achieve 8%.	No change
Dwelling Distribution Methodology Principles			
Ashdale Land and Property Company Ltd via Barton Willmore Planning Partnership-Northern (0057), Miller Strategic Land via Spawforths (2663)	Broadly support the distribution which focuses development toward higher order settlements. Expect any increase in the housing requirement to be shared to Policy SP7 proportions.	The City Council does not believe that the housing requirement needs to be increased, but if it is concluded to be necessary the percentage proportions of Policy SP7 would need reconsideration.	No change
TGMF Emsley via ID Planning (1186), Great North Developments Ltd c/o Evans Property Gr, Redrow Homes, Barratt, David Wilson Homes, Great North Developments, East Leeds Extension Northern Quadrant Consortium, Housebuilder Consortium, Robert	The apportionment in Table 2 of Policy SP7 is too prescriptive, particularly in terms of the split between Infill and Extension. The expectation for 70% of housing to be infill is unrealistic given that the majority of housing land identified in the SHLAA 2011 Update is in the form of extensions to either the MUA, Major Settlements or Smaller Settlements. The apportionment percentages in Table 2 could easily lead to a situation of restraint whereby the housing market is constrained by the insufficiency of infill sites and the quantity of settlement extension sites allowable under Policy SP7. To promote sustainable patterns of development it would remain helpful for Policy SP7 to apportion housing growth to appropriate settlement types, but not to apportion between	The City Council believes that the apportionment of Infill v. Extension and to the different tiers of settlement type is possible based on the SHLAA 2011 conclusions. This is to identify land for 66,000 dwellings. More detailed evidence drawing upon SHLAA data can be provided to illustrate the realism of the apportionment. It should also be noted that some land that forms part of the “infill” component will comprise of UDP allocated housing sites, including the East Leeds Extension.	No change

<p>Ogden Partnership, Edmund Thornhill Estates, Wortlea Estates via ID Planning (5671), Linton land Owners via Ian Bath Planning (5883), Barratt David Wilson Homes Yorkshire Homes (5895),</p>	<p>infill and extension. Without fundamentally altering the settlement distribution proposed in the Publication Draft, the following apportionment is recommended:</p> <p>Main Urban Area (including City Centre)60-70% Major Settlements 20-25% Small Settlements 10-15% Other Rural 1-5%'</p> <p>The targets in Policy SP7 should be made more flexible (5883)</p>																																										
<p>Templegate Developments via Barton Willmore Planning Partnership-Northern (0057)</p>	<p>Further to our recommendations under Policy SP6 for uplifting the overall housing requirement from 66,000 (net) to at least 94,500 (net) over a 15 year period, the requisite housing distribution by settlement should be amended. Having not seen LCC's assessment of SHLAA sites that sits behind the distributions in Policy SP7 we have doubts about the deliverability of sites within specific areas, especially the City Centre. LCC should make this information available and we reserve the right to make further comments at a later stage. Until then the following distribution is recommended:</p> <table border="1" data-bbox="365 829 1108 1082"> <thead> <tr> <th></th> <th colspan="2">Number</th> <th colspan="2">Percentage</th> </tr> <tr> <th></th> <th>Infill</th> <th>Extn</th> <th>Infill</th> <th>Extn</th> </tr> </thead> <tbody> <tr> <td>CC</td> <td>10,200</td> <td>N/A</td> <td>11%</td> <td>N/A</td> </tr> <tr> <td>MUA</td> <td>30,000</td> <td>7,400</td> <td>33%</td> <td>8%</td> </tr> <tr> <td>MS</td> <td>4,000</td> <td>23,000</td> <td>4%</td> <td>25%</td> </tr> <tr> <td>SS</td> <td>2,300</td> <td>11,600</td> <td>3%</td> <td>13%</td> </tr> <tr> <td>OR</td> <td>100</td> <td>1,400</td> <td>0%</td> <td>2%</td> </tr> <tr> <td>Total</td> <td>46,600</td> <td>47,900</td> <td>52%</td> <td>48%</td> </tr> </tbody> </table>		Number		Percentage			Infill	Extn	Infill	Extn	CC	10,200	N/A	11%	N/A	MUA	30,000	7,400	33%	8%	MS	4,000	23,000	4%	25%	SS	2,300	11,600	3%	13%	OR	100	1,400	0%	2%	Total	46,600	47,900	52%	48%	<p>The City Council does not believe that the housing requirement needs to be increased, so the recommended distribution will not be appropriate</p>	<p>No change</p>
	Number		Percentage																																								
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CC	10,200	N/A	11%	N/A																																							
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<p>TGMF Emsley via ID Planning (1186), Great North Developments Ltd c/o Evans Property Gr, Redrow Homes, Barratt, David Wilson Homes, Great North Developments, East Leeds Extension Northern Quadrant</p>	<p>The apportionment in Table 3 of Policy SP7 is too prescriptive, lacks justification and should be deleted entirely.</p> <p>Figure 3.12 of the SHMA lists housing supply estimates for the different housing market characteristic areas during 2010-26 and these do not accord with the distribution of Table 2 of Policy SP7. The SHMA goes on to conclude that it is not possible to generate a reliable need based distribution for the housing market characteristic areas.</p> <p>The apportionment in Table 3 is premature in pre-supposing</p>	<p>The City Council agrees with the SHMA conclusion that there is no reliable methodology for identifying general housing need for the housing market characteristic areas. However, it believes that for the effective planning of Leeds, including infrastructure and the distribution of other land uses, it is essential to provide an indication of the quantity of housing that needs to be planned for in different smaller geographies. One reliable way to do this is to start with site deliverability conclusions from the SHLAA, and using the locational strategy criteria set out in Policies SP1 and SP6, assess what available sites best fit the criteria. From this, a palate of sites can be identified from which the</p>	<p>No change</p>																																								

<p>Consortium, Housebuilder Consortium, Robert Ogden Partnership, Edmund Thornhill Estates, Wortlea Estates via ID Planning (5671), Barratt David Wilson Homes Yorkshire Homes (5895)</p>	<p>what areas will have appropriate housing sites ahead of preparation of the Site Allocations DPD</p>	<p>apportionment of dwelling numbers to housing market characteristic areas can be made.</p> <p>Officers have prepared and maintained a palate of sites that are considered to meet the locational criteria of the Core Strategy. This palate is not suggested to be a definitive set of sites to be advanced in the Site Allocations DPD; that would be misleading and premature. However, the palate is considered to be an evidence based way of providing an indication of the appropriate geographical distribution of housing growth in Leeds. The palate has been revised over time to reflect new circumstances, which explains the differences between Figure 3.12 of the SHMA and Table 3 of Policy SP7.</p>	
<p>Michael Green (5863)</p>	<p>There is no evidence to demonstrate that the general development targets are achievable in a manner consistent with other policies of the plan; the plan contains no mechanism for resolving any conflicts at allocation stage.</p>	<p>The palate has not been released into the public domain because people would treat it as a definitive list of supported sites rather than an indicator of broad geographical potential.</p>	
<p>The Diocese of Ripon and Leeds, AR Briggs & Co, Ledston Estate, Meadowside Holdings, Bramham Park Estate, Lady Elizabeth Hastings Charity Estate, Hatfield Estate via Carter Jonas (5681)</p>	<p>To avoid rigidity, the target figures in Tables 2 and 3 should be regarded as minima</p>	<p>Regarding the targets as minima would not be appropriate, particularly in Table 2, which is designed to achieve a sustainable pattern of housing growth concentrating on the urban areas. If the target figures for the Smaller Settlements or Other Rural localities were significantly exceeded, this would produce an unsustainable pattern of growth in Leeds. The supporting text of paragraph 4.6.18 offers potential for some flexibility but on the basis that the targets may be marginally over or under shot, thereby maintaining the overall planned pattern of growth.</p> <p>Also, Policy SP7 provides guidance for the plan making process to ensure that housing allocations support the strategy of the plan. Policy H2 provides for more flexibility by allowing sustainable windfall development over and above the distribution expected by Policy SP7.</p>	<p>No change</p>
<p>Betterspot Limited via Robert Halstead Chartered Surevyor (5649)</p>	<p>The percentage figures for each area should be driven by the availability of sites, ie the capacity of each Housing Market Characteristic Area to accommodate development by reference to such factors as suitability, availability, transport connects and sustainability.</p>	<p>The figures for each area have been based on the availability of sites in the SHLAA chosen according to the criteria of the Plan, including public transport accessibility, flood risk etc.</p>	<p>No change</p>
<p>Betterspot Limited via Robert Halstead Chartered Surevyor (5649)</p>	<p>The percentage targets are not sound. For example, the Outer south west has capacity to accommodate more than 11% of Leeds' housing development without recourse to Green Belt land. Increasing its percentage could avoid</p>	<p>Evidence is not provided to demonstrate how the requirement for the Outer South West can be delivered without reliance on Green Belt land.</p>	<p>No change</p>

	<p>unnecessary use of GB land in other areas. The percentages in Table 3 might, as a consequence, result in unnecessary changes to the Green Belt simply to fall within the guideline percentages. This approach is not sound, having regard to the NPPF objectives. Green belt releases should only be applied as a 'last resort'.</p> <p>Land currently falling within the 'open land' designation (UDP Policy N11) is capable of accommodating some housing development in the Outer South West geographic area.</p>	<p>If possible it would need to rely instead on development of the large "open land" designation under UDP Policy N11. This land has a similar role and value to Green Belt land and is afforded protection under Policy N11. Its development would not necessarily be preferable to development of Green Belt land.</p>	
<p>A Watson (0043), J Allison (4681), Miss Alexandra Hannant (4688), Mr John Buck (4697), Mr David Klemm (4776), SEORA (5053), Mr Paul Evans (5873), Claire Donkin (5893), Quod (1091)</p>	<p>Basis for distribution unclear. Why are the SHMA hypothetical distributions not used?</p>	<p>The SHMA distribution tables (Figures 6.11 and 6.12) illustrate hypothetical distributions. Fig 6.11 extrapolates recent trends of housebuilding; Fig 6.12 distributes the forecast total according to the current distribution of dwellings in Leeds.</p> <p>The distribution set out in Core Strategy Tables 2 and 3 is based on a balance of opportunities that the City Council believes could meet the strategy for sustainable development set out in Policies SP1 and SP6. At this stage the City Council does not advocate the development of any individual sites, but has used an overall mix to help determine the dwelling distribution.</p>	<p>No change</p>
<p>Michael Green (5863)</p>	<p>Lack of rationale to distribute the 66,000 new dwellings between the HM Characteristic areas. For example, a starting point might have been to expand settlements in proportion to their existing size.</p>	<p>Fig 6.12 of the SHMA provides a distribution of new housing according to the existing number of dwellings in each HM Area. However, this would not provide a good basis for distribution because it takes no account of the availability of land to deliver, nor its sustainability credentials. The distributions set out in Policy SP7 are based on an assessment of available land which could meet the Core Strategy's criteria for sustainable patterns of growth as set out in Policies SP1 and SP6.</p>	<p>No change</p>
<p>Directions Planning (5121)</p>	<p>The distribution of extensions in Table 2 is supported, but they should be more clearly identified as broad areas of search.</p>	<p>The detailed geographic choices of where urban extensions should be will be made by the Site Allocations DPD rather than the Core Strategy.</p>	<p>No change</p>
<p>City Centre should be excluded from the housing requirement</p>			
<p>Home Builders Federation (0092) Caddick Developments, Comforth and Sons, Airebank Developments, Harrow Estates, via</p>	<p>Sufficient land to meet the housing requirement of 78,350 dwellings should be identified from areas outside of the city centre. This means a notional 10,300 dwellings will be anticipated in the City Centre, but not be identified.</p>	<p>It is necessary for city centre housing land to be identified as this can then form part of Leeds' 5 year housing supply</p>	<p>No change</p>

<p>White Young Green (0420), Chatford, Taylor Wimpey, Ashdale, Keyland, Warner, Kebbell, Redrow, Miller, Barratt Leeds, Barratt York, Mirfield via Dacre Son and Hartley (0480), Redrow Homes (Yorkshire) Ltd (1938), Great North Developments Ltd c/o Evans Property Gr, Redrow Homes, Barratt, David Wilson Homes, Great North Developments, East Leeds Extension Northern Quadrant Consortium, Housebuilder Consortium, Robert Ogden Partnership, Edmund Thornhill Estates, Wortlea Estates via ID Planning (5671), C/o Hileys Solicitors via LDP Planning (5867), Barratt David Wilson Homes Yorkshire Homes (5895)</p>			
<p>Strategic Sites are needed to ensure delivery of the housing requirement</p>			
<p>Harrow Estates and Rockspring Hanover Property Unit Trust, via White Young Green (0420)</p>	<p>Table 3 indicates the scale of development required in the City to provide the level of housing needed. To give confidence in strategy be advisable to identify a number of strategic sites to give market confidence for developers and house builders to invest in these locations.</p>	<p>The NPPF refers to the 'local plan' allocation of sites. Within this overall context the City Council is preparing a Core Strategy and Site Allocations DPD and does not consider it necessary to identify strategic sites. The Core Strategy is planning for 70,000 dwellings and it is not anticipated that any individual site will be so large as to warrant justification as a strategic location. The</p>	<p>No change</p>

	Clariant Works in Horsforth should be identified.	approach of the Core Strategy is for the distribution of sites, in sustainable locations, as part of the settlement hierarchy as set out in Policies SP6 and SP7. In terms of employment, the Key Diagram, also identifies a number of strategic opportunities for job growth.	
Redrow Homes (Yorkshire) Ltd (1938)	Urban/village extension strategic sites should be identified at Tingley in accordance with NPPF paragraphs 52 and 157		

Apportionment to Housing Market Characteristic Areas – Comments about Localities

City Centre and Infill Housing

Ashdale Land and Property Company Ltd, Hallam Land Management Ltd via Barton Willmore Planning Partnership-Northern (0057), Harrow Estates via White Young Green Planning (0420), C/o Hileys Solicitors via LDP Planning (5867), Templegate Developments via Barton Willmore Planning Partnership-Northern (0057)	No evidence that the City Centre can realistically accommodate 10,200 dwellings over the plan period, particularly given that Objective 1 gives priority to development of town centre uses in the City Centre	Leeds' SHLAA 2011 identifies land for over 160,000 dwellings. Of these 16,169 are concluded to be deliverable in the city centre housing market characteristic areas during the plan period (2011/12 to 2027-28).	No change
Caddick Developments, Cornforth via White Young Green (0420), Quod (1091)	SP7 at Table 2 anticipates that 70% of new housing supply will come forward from within the MUA. This equates to 40200 new homes, thus implying a very high density of development. There is no evidence to support this approach and as such there must be a flexibility of approach that will enable other sites to come forward which can deliver sustainability in order to assist in the delivery of housing.	Leeds' SHLAA demonstrates that dwellings in the housing market characteristic areas and by settlement hierarchy typology can be delivered during the plan period. Reasonable realistic densities were agreed for different zones of Leeds with the SHLAA Partnership and individual site assessment took account of site specific characteristics.	No change
Comforth and Sons and Harrow Estates via White Young Green (0420)	SP7 Table 2 total infill 46,600 dwellings. It is questionable whether this is deliverable.	The dwelling delivery conclusions of the SHLAA were ratified by the SHLAA Partnership which includes a range of local representatives of different housing interests, including house builders. This provided a level of "market testing" to ensure that conclusions were realistic.	
MFS Land Ltd via Mosaic Town Planning (5672)	We do not consider that the proposed distribution of housing land will enable delivery to be achieved and therefore the plan will not be 'effective' in line with the requirement of NPPF (paragraph 182). The areas of focus are of questionable	The SHLAA is subject to updates, normally annually. The 2011	

	<p>viability and delivery is heavily dependent on public sector funding which is evidently going to be restricted in future years. There is no evidence of any viability assessments of the brownfield sites in these locations.</p> <p>The focus on urban/infill will make it difficult to deliver affordable housing because of the lack of viability (EVA 2010)</p> <p>Reliance on Aire Valley in delivering 6,500 – 9,000 dwellings is over-optimistic because of abnormal costs, incoherence of area and lack of interconnectedness of sites.</p> <p>Therefore, a greater reliance on outer areas is required including use of UDPR PAS land.</p>	<p>update had the effect of moderating some of the more optimistic site delivery conclusions of the 2009 SHLAA.</p> <p>Policy SP7 provides guidance for the plan making process to ensure that housing allocations support the strategy of the plan. Policy H2 provides for more flexibility by allowing sustainable windfall development over and above the distribution expected by Policy SP7.</p> <p>The greater difficulty of delivering affordable housing on urban/infill sites is recognised, but the focus on urban/infill is needed to help achieve a number of objectives including promotion of the vitality of urban areas, protecting countryside and the natural environment, encouraging use of PDL and minimising Green Belt land take. These are valid planning principles recognised by the NPPF (para 17).</p> <p>Recent work on the Aire Valley Leeds Area Action Plan expects a bottom line of 6,500 dwellings deliverable through identified sites during the plan period, but this can be expected to grow as the economy and housing market strengthens from its current low point.</p>	
Renew (5105)	This seems a sensible approach, although the feasibility of over 10,000 additional units in the City Centre may be questionable. Does this need a view as to allocation in the two time periods?	A conservative estimate of 10,200 dwellings are planned for the city centre against the 2011 SHLAA figure of 16,169. To divide the 10,200 into separate time periods would not serve any obvious planning purpose and would add unnecessary complexity.	No change
Outer South West			
Signet Planning (5039)	Supports the 11% of housing being directed to the Outer South West Character Area.	Support welcome	No change
McGregor Brothers Ltd via West Waddy ADP (5884)	Support the focus of major growth to the Outer South West, including the statement to this effect in paragraph 4.6.18	Support welcome	No change
Pegasus Planning Group (4388)	Policy SP7 sets precise figures for distribution, although the supporting text at para 4.6.18 uses 'indication' and 'guide' and states that they are not intended to be rigid targets. Policy SP7 reduces the flexibility of the Core Strategy to deliver the necessary growth, in particular in terms of utilising sustainable urban extensions to the major settlements. If some of the city centre/main urban area sites cannot deliver the level of housing anticipated, there should be flexibility for additional	Sustainable urban extensions form a key part of supply. Phasing through Policy H1 will ensure that needs are always addressed by bringing forward phases as necessary to ensure a 5 year land supply plus appropriate buffer required by the NPPF.	No change

	growth to be delivered through sustainable urban extensions.		
Mr M Dunstall (4743)	NPPF advises that "plans should take account of market signals such as land prices and housing affordability and set out a clear strategy for allocating sufficient land suitable for development in their area taking into account of the needs of the residential and business communities". Is the LPA confident that Spatial Policy 7 fully meets the needs of the residential community as required by national policy?	The City Council is confident that Policy SP7 has been conceived to meet the varied residential needs of Leeds.	No change
Redrow Homes (Yorkshire) Ltd (1938)	Outer south west 11% apportionment is about right, but the total dwelling number needs to be increased to reflect a higher overall housing requirement – if 8% were from urban extensions this would equate to 6,268 dwellings	The City Council does not believe that the housing requirement needs to be increased, but if it is concluded to be necessary the percentage proportions of Policy SP7 would need reconsideration.	No change
Michael Green (5863)	Outer south west 11% apportionment is greater numerically and proportionately than any of the other non-priority areas. The only way of achieving this level of development would be significant extension of Morley itself which would lead to settlement coalescence.	The Outer South West is relatively well structured to accept its share of housing growth having a train station and a large town centre in Morley. It also contains a substantial employment base and is well connected to the Main Urban Area.	No change
Mrs Lisa Jackson (5885)	The scale of development proposed for Outer South West will eat into the narrow strips of Green Belt leading to settlement coalescence. Funding isn't available for the infrastructure improvements to schools, health centres, dental practices, community buildings, roads, sewerage and drainage needed to support this amount of housing.	The Site Allocations DPD will seek to make best use of available brownfield infill sites and minimise the harm to Green Belt objectives, including coalescence and take account of local capacity issues too.	
P & K Cook (5899)	The amount of housing in the Morley area would affect all our roads, schools, health centres and residents. We will have no open spaces to enjoy.	The housing requirement for Leeds will inevitably put pressure on local services and transport throughout Leeds. The City Council plans to use the Community Infrastructure Levy (CIL) to help address the infrastructure burden of new development.	
Andrew Hepworth (5864)	Objects to housing development in the vicinity of Daisy Hill, Morley. It will exacerbate traffic, particularly on the A643 and cause environmental harm		
Miller via Dacre Son & Hartley (0480)	This submission advances the case for the development of land at Spring Gardens, which is located within the settlement limit of Drighlington and is an allocated Safeguarded site under Policy N34 of the Leeds UDPR 2006. The SHLAA (ref 2124) identifies that the site has a capacity to deliver 208 dwellings.	The merits of individual development sites will be considered through Allocation DPDs rather than the Core Strategy	No change
Barratt Leeds Via Dacre Son & Hartley (0480)	This submission advances the case for the development of land off Bruntcliffe Road in south Morley and an application for 200 dwellings was submitted on 22 nd March 2012. Part of the site is in the employment allocation area. The SHLAA (ref 1064 and 1281) identifies that the site has a capacity to deliver		

	498 dwellings.		
Taylor Wimpey (via Dacre Son & Hartley) (0480)	This submission advances a case for the development of land in East Ardsley & Tingley which is an allocated safeguarded site in the Leeds UDP Review under policy N34 (2006). The sites are included within the 2011 SHLAA (ref 1218, 2128 and 1143) but one of the sites is not (land at Westerton Road, Tingley).		
Mirfield via via Dacre Son & Hartley) (0480)	This submission advances a case for the development of Green Belt land between Asquith Avenue and Gelderd Road		
Outer North West			
Taylor Wimpey via Turley Associates (1743)	A third of the housing requirement for Outer north west depends on delivery of the East of Otley and Rumpolecroft UDP Housing Allocations (approx. 685 dwellings). Given the dependency of East of Otley on delivery of a bypass, more sites need to be identified in this housing market area and use must be made of PAS land in the area.	It is not the purpose of the Core Strategy to identify land. The Site Allocations DPD will need to identify sufficient sites taking account of deliverability issues of potential sites.	No change
Taylor Wimpey via Turley Associates (1743)	The support for growth of Leeds Bradford Airport means that more housing land will be needed in locations with easy public transport access to the airport, in accordance with CS Objective 7.	Airport growth is subject to surface transport improvements to access the city as a whole, not just the Outer north west housing market area. See also response given under Policy SP6.	No change
Taylor Wimpey via Turley Associates (1743)	Outer northwest housing market area – SP7 Table 3 shows 2000 dwellings up to 2028, but SHMA states requires 2362 dwellings. Therefore shortfall in delivery is likely to result.	Fig 3.12 of the SHMA shows Outer north west has a potential capacity of 2362 dwellings. But this is merely a SHLAA based capacity and should not be misinterpreted as a requirement.	No change
A Watson (0043), J Allison (4681), Miss Alexandra Hannant (4688), Mr John Buck (4697), Mr David Klemm (4776), SEORA (5053 and 5940), Mr Paul Evans (5873), Claire Donkin (5893), Zoe Main (5900), Alec Main (5901), Sharron Smith (5902), Nicola McNally (5903), Brendan McNally (5904), Shelagh Connor (5907), Joe & Karen Bentley	Outer North West requirement of 2000 dwellings creates a disproportionate pressure on Otley to provide supply. Infrastructure is already over capacity and will be overloaded by new housing development, particularly the A660 road corridor and the train line through the area. Otley is a distant outlying settlement in Leeds district and green field development would not help regenerate the main urban area. The UDPR Planning Inspector reached these conclusions. Otley has brownfield site availability evidenced by a 2009 Survey which shows 23.2ha available now. Not clear why Outer North West has nearly as much housing (2,000) as Aireborough (2,300) when the latter has three towns compared with just Otley in Outer North West (5121).	The Outer North West is apportioned a relatively modest share of the total housing requirement. The Site Allocations DPD will seek to make best use of available brownfield infill sites and minimise the harm to Green Belt objectives, including coalescence and take account of local capacity issues too. The housing requirement for Leeds will inevitably put pressure on local services and transport throughout Leeds. The City Council plans to use the Community Infrastructure Levy (CIL) to help address the infrastructure burden of new development.	No change

(5909), Wanda Phillips (5910), Alison Watson (5912), Graham George (5914), Mr Michael Littlewood (5917), Yvonne Smith (5918), Peter Smith (5919), John Powell (5921), Raymond Georgeson (5922), Peter Knighton (5926), Rosie Knighton (5927), David Ginn (5928), Louise Warrington (5929), Mark Seghetti (5932), Maria Crosby (5933), Sheila Collins (5934), Stephen Seddon (5935), Sandra Biss (5936), Karl Prime (5937), Brian Biss (5938), Mrs Deborah Biss (5939), Directions Planning (5121)			
Taylor Wimpey (via Dacre Son & Hartley) (0480)	This submission advances a case for the development of land in Rumpolecroft which is an allocated Phase 3 housing land allocation site in the Leeds UDP Review (2006), with an estimated dwelling capacity of 135 units. The site is included within the 2011 SHLAA (ref 744) with an area of 5.7ha.	The merits of individual development sites will be considered through Allocation DPDs rather than the Core Strategy	No change
Barratt Leeds (Via Dacre Son & Hartley) (0480)	This submission advances the case for the development of land in East Otley, reliant on the implementation of the east Otley relief road and is an allocated housing site under the Leeds UDPR 2006. The SHLAA (ref 745) identifies that the site has a capacity to deliver 550 dwellings.		
Outer South			
Hallam Land Management Ltd via Barton Willmore	Question whether the Major Settlements are capable of accommodating 4,000 dwellings as infill development. The SHLAA 2011 Update in respect of Rothwell/ Oulton/	The capability of the Major Settlements to absorb housing development is demonstrated by the SHLAA and site assessment. The City Council has tested a balance of	No change

Planning Partnership-Northern (0057)	Woodlesford only, we note that there are very few infill sites available, certainly not up to the 666 dwellings that could potentially be required as infill development here (4,000 dwellings divided by the 6 Major Settlements). On this basis, our Client believes that the majority of new housing development in Rothwell will need to come from sustainable Green Belt release sites, such as their site at Fleet Lane / Methley Lane, Oulton.	opportunities that the City Council believes could meet the strategy for sustainable development set out in Policies SP1 and SP6. At this stage the City Council does not advocate the development of any individual sites, but has used an overall mix to help determine the dwelling distribution, including for the Major Settlements. It should not be assumed that there will be equal apportionment of the 4000 dwellings between the 6 Major Settlements.	
Aireborough			
Mr Cedric Wilks (4783)	Aireborough is chosen to receive a further large influx of housing. In view of the number of houses recently built in this area could not a percentage of these planned houses be allocated to the North East of Leeds? A derelict land survey is necessary to see if there are small pockets of building land available to support some house building.	The distribution in Policy SP7 already accounts for making best use of PDL which is found all over Leeds but concentrated in certain areas such as North and East Leeds. Such land is identified in the SHLAA.	No change
WARD (Wharfedale & Airedale Review Development) (5852), Martin Gostling (5872)	2,300 dwellings for Aireborough is too many because of inadequate infrastructure. The A65 road, public transport, schools and GPs are all overloaded. Also, the 3,100 dwellings proposed by Bradford City Council along the A65 corridor will exacerbate the problem.	The housing requirement for Leeds will inevitably put pressure on local services and transport throughout Leeds. The City Council plans to use the Community Infrastructure Levy (CIL) to help address the infrastructure burden of new development. The Site Allocations DPD will seek to make best use of available brownfield infill sites and minimise the harm to Green Belt objectives and take account of local capacity issues too.	No change
Martin Gostling (5872)	The small independent centres of Rawdon, Guiseley and Yeadon have been and would be more compromised by housing growth		
Susan Kelly (5870)	Rawdon lacks capacity to support new housing in terms of overloaded roads (and potential for accidents), schools and public transport.		
Flora Pearson (5931)	Proposed development of Rawdon Billing - unsound because this is green belt, Harrogate Road and the A65 are very congested already, infrastructure of schools dentists and GPs are full to capacity, and has Horsforth Rawdon coal seam which is full of unrecorded bell pits.		
Chatford (via Dacre Son & Hartley) (0480)	This submission advances a case for the development of land in Bramhope, across the road from the Hilton Grange and Hilton Mews housing developments. Review as phase 3 housing land allocation (2006). The site is included within the 2011 SHLAA (ref 1036) with a capacity of 13 dwellings.		
Warner via Dacre Son & Hartley (0480)	This submission advances a case for the development of Green Belt land at Coach Road, Guiseley. The SHLAA identifies a site development capacity of 65 to 70 dwellings.	The merits of individual development sites will be considered through Allocation DPDs rather than the Core Strategy	No change
Redrow via Dacre	This submission advances a case for the development of land		

Son & Hartley (0480)	designated under UDP Policy N5 at Outwood Lane, Horsforth. It is a SHLAA submission (Ref: 1310).		
Outer North East			
Lisa Fox (5880)	The strategy to use Green Belt land for housing is at odds with national government and local MP statements to protect it. Building on the Green Belt around Barwick in Elmet will damage the rural visual setting of the village.	<p>The Core Strategy aims to make the best use of urban, brownfield and regeneration sites so that the use of countryside, including Green Belt land, is minimised. Nevertheless, the housing need in Leeds is so great that some Green Belt land will be needed. This means that, based on assessment, some land will be taken out of the Green Belt through the plan making process to allow for development. This is consistent with NPPF paras 83-85. The NPPF continues to protect land that is Green Belt from inappropriate development, which may account for national government statements to this effect.</p> <p>The Site Allocations DPD will seek to minimise the damage on Green Belt objectives and visual setting of villages in its determination of the best mix of sites to meet the housing requirement.</p>	No change
Linton land Owners via Ian Bath Planning (5883), Walton and Co (5510), DPP(5543)	A greater proportion of the housing should be sought from the Outer North East. This should be particularly the settlements near to Wetherby, including Linton; the close proximity to this Major Settlement make the adjoining settlements sustainable. More use should be made of land identified in the Outer North East through the SHLAA (5883). Doubtful whether 3,300 is achievable on the East Leeds Extension during the plan period	<p>Starting with the site deliverability conclusions from the SHLAA, and using the locational strategy criteria set out in Policies SP1 and SP6, the City Council has assessed what available SHLAA sites best fit the criteria. From this, a palate of sites can be identified from which the apportionment of dwelling numbers to housing market characteristic areas can be made. Officers have prepared and maintained a palate of sites that are considered to meet the locational criteria of the Core Strategy. This palate is not suggested to be a definitive set of sites to be advanced in the Site Allocations DPD; that would be misleading and premature. However, the palate is considered to be an evidence based way of providing an indication of the appropriate geographical distribution of housing growth in Leeds.</p> <p>Hence, the quantum of housing assigned to the Outer North East can be shown to provide a sustainable pattern of growth. Any additional housing may not be sustainable given the remoteness and lack of facilities in many of the settlements. Detailed distribution of housing within the Outer North East, whilst expected to accord with the Core Strategy's overall policies on sustainable location, will be a matter for the Site Allocations DPD and Neighbourhood Plans.</p>	No change

		The SHLAA 2011 gives evidence that over 3500 dwellings can be delivered on the East Leeds Extension during the CS period.	
Barrett York via Dacre Son & Hartley (0480)	This submission advances a case for the development of land in Boston Spa which is an allocated safeguarded site in the Leeds UDP Review (2006). The site is included within the 2011 SHLAA (ref 2137) with a capacity of 109 dwellings.	The merits of individual development sites will be considered through Allocation DPDs rather than the Core Strategy	No change
Kebbell Homes via Dacre Son & Hartley (0480)	This submission advances a case for the development of brownfield land in the Green Belt at Sandhills Yard, Thorner being land located just outside the village of Thorner in the settlement of Sandhills		
Kebbell Homes via Dacre Son & Hartley (0480)	This submission advances a case for the development of a Green Belt site at Carr Lane, Thorner It is referenced as site 1040 in the SHLAA.		
Outer South East			
McGregor Brothers Ltd via West Waddy ADP (5884)	Support the focus of major growth to the Outer South East, including the statement to this effect in paragraph 4.6.18	Support welcomed	No change
Taylor Wimpey and Ashdale via Dacre Son & Hartley (0480)	We advance the case for the allocation of land which immediately abuts land allocated for employment use in Micklefield currently designated as PAS or safeguarded land under Policy N34 of the UDPR 2006. Micklefield is a relatively compact settlement with excellent infrastructure links as recognised in the Core Strategy which not only identifies the settlement for housing growth but additionally promotes a new rail station and park and ride facility.	The merits of individual development sites will be considered through Allocation DPDs rather than the Core Strategy	No change
Taylor Wimpey and Ashdale via Dacre Son & Hartley (0480)	The Safeguarded Land off Park Lane at Allerton Bywater covers a considerable area and has the ability to deliver a mix of uses that would over the life of the Core Strategy help transform Allerton Bywater into a self-sustaining location. The Safeguarded Land is capable of delivering new homes, employment, retail, education and greenspace without impacting on the Green Belt.		
East Leeds			
DPP (5543)	Questionable that 17% of the housing requirement can be met from East Leeds	There is evidence to demonstrate this is possible in the SHLAA 2011	No change
Taylor Wimpey (Via Dacre Son & Hartley) (0480)	The master planning, development and implementation of ELE should be carried out in a comprehensive and coordinated manner which ensures the creation of a successful, well designed urban extension which is well integrated with the existing urban area. The comprehensive delivery and	The ELE is already a housing allocation.	No change

	programming of all essential infrastructure is of great importance to the project and its close association with the regeneration of existing East Leeds communities and the AVL.		
North Leeds			
Taylor Wimpey (via Dacre Son & Hartley) (0480)	This submission advances a case for the development of land in Cookridge which is an allocated safeguarded site in the Leeds UDP Review under policy N34 (2006). The site is included within the 2011 SHLAA (ref 1199) with a capacity of 298 dwellings. The majority of the site is designated Protected Area of Search.	The merits of individual development sites will be considered through Allocation DPDs rather than the Core Strategy	No change
Chatford (via Dacre Son & Hartley)	This submission advances a case for the development of land in Headingley, just South of the town centre boundary. The site is included within the 2011 SHLAA (ref 1120).		
Barratt Leeds (Via Dacre Son & Hartley) (0480)	This submission advances the case for the development of land in Adel, and is a protected area of search under the Leeds UDPR 2006. The site is a SHLAA (ref 2130). Planning permission has been granted for 45 dwellings subject to the completion of a 106 agreement.		
Outer West			
Chatford (via Dacre Sons & Hartley) (0480)	This submission advances a case for the development of land in Farsley which is mostly allocated in the Leeds UDP Review as phase 3 housing land allocation (2006). The site is included within the 2011 SHLAA (ref 648 and 652) with a capacity of 45 dwellings.	The merits of individual development sites will be considered through Allocation DPDs rather than the Core Strategy	No change
Taylor Wimpey (via Dacre Son & Hartley) (0480)	This submission advances a case for the development of land in New Farnley which is an allocated safeguarded site in the Leeds UDP Review under policy N34 (2006). The site is included within the 2011 SHLAA (ref 2137) with a capacity of 129 dwellings.		
Taylor Wimpey (via Dacre Son & Hartley)	This submission advances a case for the development of land in Farnley at Wood Lane/ Whitehall Road. The site is included within the 2011 SHLAA (ref 3056 and 1171) with a capacity of 720 dwellings.		
Keyland via Dacre Son & Hartley) (0480)	This submission advances a case for the development of Green Belt land at Houghside Sewage Works (built circa 1890's and redundant since 1998). The land has SHLAA site references 1213, 1060 and 3048.		