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Leeds SAP Remittal Proposed Main Modifications,  
Policy & Plans Group,  
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SENT BY EMAIL  
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27/01/2022

Dear Planning Policy Team,

## REMITTED LEEDS SITE ALLOCATIONS PLAN: MAIN MODIFICATIONS

1. Thank you for consulting with the Home Builders Federation (HBF) on the proposed Main Modifications to the Leeds Local Plan Site Allocations Plan Remittal document.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. The HBF would like to submit the following comments on the proposed Main Modifications

### MM2: Paragraph 2.28

4. The Council proposes to amend this paragraph to state that *'the Site Allocations Plan meets the Core Strategy requirement between 2012 and 2028. To that end there are no exceptional circumstances to justify the release of land from the Green Belt to meet housing needs up to 2028'*. The HBF is concerned that the Council has not fully explored the exceptional circumstances in relation to the need to release the Green Belt, and as such this is not a sound modification.

### MM2: Paragraph 2.29

5. The Council propose to amend this paragraph to state that *'the Council is committing to a review of the Plan following adoption of the Core Strategy Selective Review and in accordance with Policy HGR1. At that time, the Council shall consider whether there is a need for further allocations and whether there are exceptional circumstances for release of Green Belt land to meet the up-to-date housing requirements of the City. This will require the submission of a Site Allocations Plan Review no later than 31<sup>st</sup> December 2021 to the Secretary of State'*. The HBF is concerned that these amendments do not add clarity to this paragraph, and potentially add further confusion as to how and when the Council intend to undertake a review of the Site Allocations Plan in order to deliver the entire housing requirement and when they intend to fully consider the exceptional circumstances for the potential release of Green Belt. The HBF does not consider that this modification is sound.



### **MM3: Paragraph 2.31**

6. The Council propose to amend this paragraph to state that *'the +/- performance against indicative HMCA targets up to 2028 is shown in Table 1. The greatest differences between Policy SP7 HMCA targets and allocated capacity are in the outer area HMCAs with Green Belt boundaries. Given that the overall housing requirement has been met through non-Green Belt land, there are no exceptional circumstances to justify the release of land from the Green Belt to meet housing needs up to 2028.'* The HBF is concerned that the Council have not provided sufficient housing across all of the HMCAs and that there will not be sufficient housing to meet needs in all areas of the City. The HBF is also concerned that the Council has not fully explored the exceptional circumstances for release of the Green Belt and as such is not in a position to state that there are not exceptional circumstances for release. The HBF does not consider that this modification is sound.

### **MM4: Paragraph 2.32**

7. The Council proposes to replace this paragraph with a new paragraph which states that it has been possible to identify more supply in the City Centre and Inner Areas of Leeds than was envisaged at the time of the Core Strategy Policy SP7 was adopted. This oversupply in these areas is consistent with wider policies of the Core Strategy and helps to avoid release of Green Belt land to meet housing requirements. It goes on to suggest that this is in line with the Core Strategy ambition and national policy which attaches great importance to the Green Belt. The HBF is concerned that the Council are picking and choosing which elements of the Core Strategy and NPPF with which to be in line and not the whole documents. For example, the NPPF also looks for plans to support the Government's objective of significantly boosting the supply of homes, to provide a sufficient amount and variety of land and that the needs for different groups in the community should be met including the provision of affordable and family homes. This does not suggest land supply should be limited to certain areas of the City.

### **MM11 to MM49**

8. The HBF continues to consider that the reduction in allocations will only increase the issues with housing land supply in terms of range and distribution not just quantity, it will not provide a balanced housing market and will do nothing to positively contribute to the delivery of housing and the local plan as a whole. The HBF does not consider that these modifications are sound.

### **Future Engagement**

9. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
10. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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