

Leeds Local Plan 2040 Scoping Consultation
Policy & Plan Group
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Dear Planning Policy Team,

LEEDS LOCAL PLAN 2040: SCOPING CONSULTATION DOCUMENT

1. Thank you for consulting with the Home Builders Federation (HBF) on the Leeds Local Plan 2040 Scoping Consultation.
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 is concerned that Leeds approach to updating the Plan in a piecemeal basis increases the complexity of the Plan, has the potential for confusion as different elements of the Plan cover differing timescales, and has the potential for policies not to be considered in a holistic manner. This has been concern has been raised previously in our representations and continues to be a concern with this update.

Spatial Strategy

4. The Topic Paper highlights that Leeds is the second largest city outside of London and that its population is forecast to grow by around 37,000 people between 2022 and 2040. The Topic Paper suggests that there is an opportunity for the spatial strategy to relate more directly to the 20-minute neighbourhood, it suggests that this approach could have implications for the hierarchy of settlements.
5. The HBF considers that the 20-minute concept can be a useful consideration when determining the appropriate location of development. However, the HBF does not consider that it should be used as a blunt tool for development management or site allocations. The HBF considers it will also be appropriate to consider the range and variety of development provided, it may be that additional development could help a smaller settlement or cluster of settlements to support more services and therefore contribute to the creation of a 20-minute or a more sustainable neighbourhood. The



Council may also want to consider that larger developments may also be able to contribute to the creation of services or improved active travel infrastructure or open spaces. The HBF considers that there is a need for flexibility within the policy to allow for the development and promotion of sustainable developments, and to ensure that the policy is not used negatively to prevent development. The Councils will also need to work on making active travel and public transport quick, easy to use, well maintained, safe and available to all, and therefore more appealing than using a car.

6. The Paper suggests that consideration will need to be given to the extent to which maximising affordable housing delivery or other planning gain should be prioritised, and what impacts this will have on patterns of growth. The HBF supports the Council in considering the implications of patterns of growth on the delivery of affordable homes and other planning gain, this is an issue that the HBF have raised during many of the previous consultations in relation to the CSSR and the SAP. The HBF considers that the focus of development within the City Centre and Inner Areas has, and will have implications for the types, size and tenure of homes provided, and will not address the affordable housing need, does not provide the appropriate mix of homes needed to meet the housing needs across the area, and will reduce the level of planning gain available.
7. The Paper also highlights the need to consider what potential land is available for development, it suggests that an urban capacity study will need to be undertaken, and that consideration will need to be given to the role of land currently designated as rural land and Green Belt. The HBF would support the Council in undertaking an assessment of the urban capacity, and in considering the role of land currently designated as rural land and Green Belt. The HBF considers that it will be important that this undertaken in a realistic manner, and that consideration is taken to ensure that the housing land supply provides an appropriate level of flexibility to ensure that the Plan is robust and resilient to change. The Council's housing land supply should include a short and long-term supply of sites with both strategic and non-strategic allocations for residential development. Housing delivery is optimised where a wide mix of sites is provided, with a range of sites by both size and market location. A wide mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice and competition in the land market. The Council should also ensure that they identify at least 10% of their housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target in line with the NPPF requirements.

Housing

8. The Topic Paper states that the Plan will need to have a policy focus that as a starting point meets the full requirements of the NPPF, currently this would be the standard method including the 35% urban uplift. The Council highlight that currently this would mean a housing requirement over 4,000 new homes per annum and would necessitate the need for land allocations over the plan period.
9. The HBF considers that the Council should use the Standard Method, including the urban uplift, as the starting point for determining the housing requirement, as set out in

the NPPF and the PPG. However, the HBF also recommends that the Council consider the potential circumstances when it might be appropriate to plan for a higher housing need figure than the standard method indicates as set in the PPG¹. This includes growth strategies for the area, strategic infrastructure improvements, taking unmet need from neighbouring authorities, previous levels of delivery or previous assessments of need.

10. The Paper highlights the need for the evidence base to be updated in relation to affordable housing suggesting that the Council will need new evidence in relation to the need and requirements for affordable housing. The HBF supports the Council in seeking to update their evidence in relation to the need for affordable housing, this is a sensible approach to ensuring that the appropriate homes are provided in the City. The HBF would also recommend that the Council seek to ensure that they have an appropriate evidence base in relation to all housing needed for different groups in the community including families with children and older people, in line with the NPPF.
11. The Council also propose to give consideration to how they are to deliver First Homes, including consideration of the market value discount percentage, the sale price cap, household income and local connections test. The HBF considers that it is appropriate for the Council to give consideration to the provision of First Homes, the HBF recommends that the Council also gives consideration to the viability and the impacts on deliverability homes in light of any changes to the market value discount percentage, sales price cap, household income or local connections test. The Council will need to ensure that they have robust evidence demonstrating why these changes are needed and to ensure that these homes can still be delivered.
12. The Council propose to continue with a requirement for a housing mix, which must consider the latest evidence of need. The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements, requiring a mix that does not consider the scale of the site or the need to provide significant amounts of additional evidence. The HBF considers that flexibility will be important in any policy in relation to housing mix, this allows developers to consider not only the identified need but also market aspirations, local and site characteristics and viability.
13. The Council propose to consider options around the provision of self-build plots, this could include a requirement to provide a proportion of plots on larger sites. The PPG² sets out how local authorities can increase the number of planning permissions which are suitable for self and custom build housing. These include supporting neighbourhood planning groups to include sites in their plans, effective joint working, using Council owned land and working with Home England. The HBF considers that policy mechanisms could be used to ensure a reliable and sufficient provision of self & custom build opportunities across the Borough including allocation of small and medium scale sites specifically for self & custom build housing and permitting self & custom build

¹ PPG: 2a-010-20201216

² ID: 57-025-20210508

outside but adjacent to settlement boundaries on sustainable sites especially if the proposal would round off the developed form. These potential policy proposals would all be preferable to requiring a proportion of plots to be provided on larger sites. The HBF recommends that the Council seeks to work more closely with landowners and people on the Self-Build Register to determine the most appropriate policy approach.

14. The Council suggest that they will consider whether there is a need to expand beyond the current requirement for accessible homes to include other bespoke needs such as provision of homes to meet the needs of those with mental impairments. The Council should note that the Government response to the Raising accessibility standards for new homes³ states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. M4(3) would continue to apply as now where there is a local planning policy in place and where a need has been identified and evidenced. The HBF is not clear on what the Council would expect in terms of housing design or site layout which would allows homes to meet the needs of those with mental impairments, therefore, is not possible to comment on this proposal at present.

Other Topic Areas

15. This paper highlights the number of policies within the Leeds Local Plan and their spread across a series of different documents, which can make the Plan challenging to use. It suggests that the Leeds Local Plan 2040 may be an opportunity to consider how existing policy could be streamlined. The HBF would strongly recommend that the Council take this opportunity to create a more streamlined planning policy that is easier to use.

Future Engagement

16. 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.
17. 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,



Joanne Harding
Planning Manager – Local Plan (North)

³ <https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes/outcome/raising-accessibility-standards-for-new-homes-summary-of-consultation-responses-and-government-response#government-response>

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