

Leeds SAP Revised Submission Draft Consultation
Policy and Plans Group
The Leonardo Building
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SENT BY EMAIL
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03/04/2018

Dear Sir / Madam,

LEEDS SITE ALLOCATIONS PLAN: REVISED SUBMISSION DRAFT PLAN

Thank you for consulting with the Home Builders Federation on the Leeds Site Allocations Plan Revised Submission Draft Plan.

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.

SAP Modifications 1-8, 14-16, 18-19, 21, 23-24, 26-29, 33-36, 37-43, 44-47, 48-58, 61-70, 72-83, 85-94, 97-108, 111-122, 125-134 Broad Locations, Green Belt Release and Safeguarded Land

The HBF consider that the proposed modifications are unsound as they are not positively prepared, effective or justified.

The HBF does not wish to comment upon the acceptability, or otherwise, of individual allocations. However, the HBF are concerned with the proposed addition of broad locations rather than allocations within the Local Plan.

The Council have well documented issues with housing delivery, with only 13,824 dwellings completed in the six-year period of 2012/13 to 2016/17. Well below the 18,300 dwellings that should have been completed based on the 3,660 dwellings proposed in policy SP6, and significantly below the 21,875 dwellings based on the overall housing requirement. The HBF consider that the reduction in allocations and the introduction of Broad Locations will only increase these issues with housing land supply and will do nothing to positively contribute to the delivery of housing and the local plan as a whole.

The phasing is set out in modification 8 it states that identified and allocated sites will be immediately released, the Council consider that these sites will provide sufficient land to meet the housing requirement until year 11. Beyond this point land will need to be released from the Green Belt and the Council suggest this land will be designated as broad locations and will contribute to future phases of the plan as and when required to maintain a five-year housing land supply.

The HBF have considerable concerns in relation to this approach. The HBF do not consider this approach to be in line with the need for a plan to be positively prepared. Given the issues that Leeds have had previously in relation to delivery and the supply of housing land it is likely that these Broad Locations will need to be released. However, this will now require a local plan review. This is considered to be inefficient and time consuming and appears to be a scheme of avoidance. Given the poor record of delivery and the lack of a five-year housing land supply it would appear more appropriate for the Council to look for more flexible and responsive approaches to ensure that the sites are brought forward in a timely manner and contribute to the provision and delivery and housing requirement.

The HBF also have concerns that this approach provides little or no certainty to developers making investment decisions as to when, and if, their site will be released. It is likely that this will in turn impact on the potential for developers to deliver and the speed as to which they can deliver. The HBF would recommend that the Council sought to provide more choice and flexibility for developers in terms of the sites available by allocating more sites and by providing a buffer of sites over and above the housing requirement. A reasonable buffer is required to provide consistency with the NPPF requirement to boost supply, plan positively and provide flexibility, and to ensure that the CS housing requirement is met as a minimum. A buffer should be sufficient to provide a balance against the inevitable under or none delivery from some existing commitments or proposed allocations. This is may happen for a variety of reasons, such as economic viability, speculative applications, unknown site conditions, site constraints and re-modelling of sites.

The Council and Inspector will also be aware of the Government's recent Housing White Paper. This suggests that a delivery test will be placed upon Local Planning Authorities. This will require action to be taken if delivery falls below 95% of the Council's annual housing requirement. In terms of Leeds, the release of sites from Broad Locations would be an appropriate initial response to any such delivery failures. Given the levels of delivery recently witnessed it would be appropriate that such a mechanism is put in place within the SAP.

The HBF recommend that the Council continues to work with and engage home builders and developers to ensure that the supply of homes remains deliverable and that appropriate actions can be taken if concerns in relation to supply as set out in our previous letters in relation to unimplemented permissions, expired permissions and long-standing allocations are realised.

The HBF also continues to have concerns in relation to the amount of land to be safeguarded, particularly as this has now been reduced to allow for some of the

Broad Locations. The HBF continues to promote the need for additional safeguarded land to provide certainty that the Green Belt boundary will not need to be altered beyond the plan period.

Future Engagement

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.

The HBF would like to be kept informed of the publication of the Inspector's report and the adoption of the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J. Harding', written in a cursive style.

Joanne Harding

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