

Leeds SAP Revised Submission Draft Consultation
Policy and Plans Group
The Leonardo Building
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Leeds
LS2 8HD

SENT BY EMAIL
sap@leeds.gov.uk
10/04/2019

Dear Sir / Madam,

LEEDS SITE ALLOCATIONS PLAN: MAIN MODIFICATIONS

Thank you for consulting with the Home Builders Federation on the Leeds Site Allocations Plan Main Modifications.

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.

Draft Mod 2 – Section 1, 1.6

The HBF support the additional clarity provided by the proposed text, to identify the exact Plan Periods covered by each policy and the relevant information in relation to the commitment to review the SAP document. However, it remains a disappointment that the Council did not take the opportunity to extend the Plan period for all of the policies, whilst preparing the SAP.

Draft Mod 3 – Section 2, 2.27

The HBF does not consider this modification to be sound as it not considered to be positively prepared.

The HBF continue to have concerns in relation to the approach of the Council in relation to housing allocations and housing delivery, as set out in all of our previous responses. The HBF consider that the reduction in allocations will only increase the issues with housing land supply and will do nothing to positively contribute to the delivery of housing and the local plan as a whole.

Draft Mod 4 – Section 2, New Policy HGR1

The HBF generally support the Council's commitment to ensuring that any SAP review will be submitted no later than 31 December 2021. However, the timescales for the preparation of the document seem very tight if the preparation is not to be commenced until the CSSR is adopted. It is also leaving very tight timescales for developers to be able to bring forward land to meet housing need from the year 2023, particularly if sites are still subject to significant debate at the examination, which would be taking place in 2022.

Draft Mod 10 – Section 2, 2.32

The HBF support the deletion of all references throughout the SAP to phasing of housing land.

Draft Mod 17 – Section 2, 2.60

The HBF does not consider this modification to be sound as it not considered to be positively prepared.

The HBF continue to have concerns in relation to the approach of the Council in relation to safeguarded land, as set out in all of our previous responses. The HBF consider that the reduction in safeguarded land will only increase the 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 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.

Future Engagement

I trust that the Council and the Inspectors will find these comments useful as they continue to progress the SAP to adoption. 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,



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