
Report of Director of City Development

Report to Joint Plans Panel

Date: 30th November 2017

Subject: Update to Leeds Site Allocations Plan

Are specific electoral Wards affected? If relevant, name(s) of Ward(s): ALL	☒ Yes	☐ No
Are there implications for equality and diversity and cohesion and integration?	☐ Yes	☒ No
Is the decision eligible for Call-In?	☐ Yes	☒ No
Does the report contain confidential or exempt information? If relevant, Access to Information Procedure Rule number: Appendix number:	☐ Yes	☒ No

Summary of main issues

1. The Leeds Local Plan sets out a vision and a framework for the future development of the City. It is made up of a number of separate documents at different stages of preparation: a Core Strategy, Natural Resources and Waste Plan, the saved policies of the Unitary Development Plan, Site Allocations Plan and Area Action Plan for the Aire Valley. These Local Plan documents are a critical tool in guiding decisions about individual development proposals because they (together with any Neighbourhood Plans that have been made) form the starting point for considering whether planning applications can be approved.
2. This report sets out an update on the Leeds Site Allocations Plan, which was submitted to the Secretary of State for independent examination in May 2017. The Examination timetable has been amended in order to allow consideration of recently changed national guidance, which indicates a lower trajectory of housing needs. In order to responsibly reflect the implications of this, the Council's Development Plans Panel and Executive Board are considering changes to the SAP which will be made available for public consultation in the New Year (following the approval of Council),

Recommendations

3. Joint Plans Panel is invited to note the report.

1 Purpose of this report

- 1.1 This report sets out an update to the Leeds Site Allocations Plan (SAP) which plans for the delivery of 66,000 new homes throughout the District's 11 Housing Market Characteristic Areas (HMCAs); as set out in the Adopted Core Strategy (2014) for the plan period 2012 to 2028.
- 1.2 It notes the need for an amended approach to the hearing sessions for the SAP as a result of recent consultation by DCLG on housing needs and highlights the nature of these changes and the revised SAP timetable arising.

2 Background Information

- 2.1 In February 2017 Executive Board and Council agreed the submission of the SAP to the Secretary of State and the Examination commenced in May 2017. At the same time Executive Board also agreed that the scope of a Core Strategy Selective Review (CSSR) be subject to public consultation and that, among other things, it focus on a review of the housing requirement in the light of the fact that the demographic evidence base has changed since it was Adopted.
- 2.2 A new Strategic Housing Market Assessment (SHMA) was commissioned which concluded that a revised housing requirement for the new plan period (2017 to 2033) would be between 51,952 – 60,528 homes. Within the context of national planning guidance (National Planning Policy Framework), it is not possible to substitute one housing requirement figure for another, without a formal review and independent examination of the Plan. Therefore, this process is taking place as part of the agreed CSSR, with the SAP being examined against the requirements already set out in the adopted Core Strategy. Up until just prior to the commencement of hearings the Council was of the view that any discrepancy between the SAP and the CSSR housing requirement could be accommodated with an extended plan period i.e. SAP allocations would build out over a longer period.
- 2.3 Following the submission of the SAP for independent examination, hearing sessions were initially planned to commence on 14th October 2017. However, as a consequence of a Department of Communities & Local Government (DCLG) consultation ('Planning for the right homes in the right places') on 14th September, it has been necessary for the Council to take stock of these consultation proposals and their implications for Green Belt release of land through the SAP. This is because the DCLG proposals, without any prior notification to the Council, propose and apply a new very simplified methodology for calculating the housing requirement as part of the development plan. The new methodology results in an annual housing figure of 42,384 over the plan period. This is far lower when compared to the 70,000 Core Strategy figure and lower than the range derived from the 2017 SHMA. The standardised methodology includes a minimal uplift for affordable housing (considered to not reflect local needs) and no reflection of economic growth.
- 2.4 As a consequence of the DCLG consultation proposals and the need for the Council to prepare a response to them (subsequently agreed through Development Plan Panel on 3rd November) and to undertake further technical work, the Council agreed with the SAP Inspectors to continue with the SAP Hearings in October but with a

revised focus on selective issues. These were Employment, Green space, Retail, Gypsies Travellers and Travelling Showpeople and formed Stage 1 of the hearing sessions.

3 Main issues

- 3.1 There is a need to reconsider the housing proposals in the Submission SAP. The Inspector has allowed housing matters to be deferred as part of stage 2 hearings to commence in Summer 2018 and following further consultation on changes to the SAP.
- 3.2 In the circumstances, this is considered to be a pragmatic and practical solution to the City Council's commitment (and Government's requirements) for development plans to be in place as quickly as possible. This approach recognises the wider changing context arising from the DCLG proposals (and emerging CSSR) and maintains a plan led approach to managing growth, consistent with national planning guidance and the consultation proposals.
- 3.3 The DCLG consultation suggests that the housing need in Leeds is to reduce when compared to that in the adopted Core Strategy and therefore despite being considered sound, the Site Allocations Plan may, in its current form result in Green Belt being released for housing, which is ultimately not required in the long term. This would not fulfil the exceptional circumstances required by the NPPF. However, the SAP Inspectors are legally obliged to consider the SAP against the Adopted Core Strategy.
- 3.4 A revised approach has been developed which responsibly seeks to hold off on release of Green Belt land now until such a time as the CSSR has set a revised housing requirement and a review of the SAP can look again at the need for Green Belt release. Development Plan Panel has considered the revised approach at its meetings on 3rd and 21st November. In order to ensure a responsible approach to protection of the Leeds Green Belt and so as to ensure that the Local Plan is up to date, a revised approach was set out as the most preferable against alternatives.
- 3.5 The approach involves:
 - Maintaining the release of nearly 6,000 homes on land which is designated as UDP Green Belt
 - Identifying sites throughout the District which best fit with the spatial strategy of the Core Strategy and the distribution of housing already agreed by Council in the SAP
 - Retaining Green Belt designation on land previously earmarked for release for nearly 7,000 homes and identifying this land as a "Broad Location for Growth" in line with the NPPF
 - Retaining Green Belt designation on land previously earmarked for release for safeguarded land and identifying this land as a "Broad Location for Growth"
 - Securing as much housing land as possible as soon as possible so as to avoid releasing Green Belt land now; by removing the approach to the phasing

of land to latter years of the plan period – this ensures that non-Green Belt land can help contribute to housing needs immediately

- 3.6 As part of this process it has been important to capture the implications of the recent decisions of the Secretary of State and the Council on UDP PAS land and thus ensure that such sites are accounted for prior to consideration of how much Green Belt land needs to be released to help meet a housing trajectory of the SAP. Reflecting these sites has meant that less Green Belt land is proposed to be released.
- 3.7 Sites within Broad Locations will form a pool of sites which remain in the Green Belt until such a time as a revised housing requirement is adopted in the CSSR. Such sites will not be considered suitable for development and will retain their UDP Green Belt designation.
- 3.8 This revised approach, as well as ensuring that the SAP meets its housing trajectory (in line with the Adopted Core Strategy) will also help ensure that upon Adoption the Council will be able to demonstrate a five year housing land supply.
- 3.9 The sites affected by this are listed in **Appendix 1**.

Next Steps

- 3.10 The revised approach has necessitated amendments to the timetable of the SAP. This is indicative and subject to consultation with the Inspectorate.

Milestone	Date	Notes
Executive Board	13 th December 2017	Recommend changes for consultation to Council
Full Council	10 th January 2018	Approve changes for submission subject to public consultation and necessary amendments
Public Consultation	22 nd January to 2 nd March 2017	Public Consultation
Submission of revised draft to SAP Inspector	March 2017	Responses will be sent in full and in summary format
Inspectors preparation for Stage 2 hearing sessions	April to June 2018	- Revised Matters and Issues - Revised Guidance Note - Revised Agenda
Hearing Sessions Stage 2	July 2018	In line with Inspector's and Programme Officers availability

- 3.11 It is important to note that the SAP remains at Examination and that its highly advanced stage of preparation remains a material consideration in planning decisions.

4 Corporate Considerations

4.1 Consultation and Engagement

- 4.1.1 The focus of this report has been to update Members of the proposed changes for the Site Allocations Plan (SAP) to respond to the recent DCLG Consultation and potential downward trajectory of housing need. It is intended that following further

technical work a revised submission draft plan will be prepared and subsequently consulted upon in early 2018.

4.2. Equality and Diversity / Cohesion and Integration

- 4.2.1 In the preparation of the Site Allocations Plan, due regard has been given to Equality, Diversity, Cohesion and Integration issues. This has included the completion of EDCI Screening of the SAP and meeting the requirements of the Strategic Environmental Assessment Directive, which has meant that the Plan is subject to the preparation of a Sustainability Appraisal. The purpose of such Appraisal is to assess (and where appropriate strengthen) the document's policies, in relation to a series of social (and health), environmental and economic objectives. As part of this process, issues of Equality, Diversity, Cohesion and Integration, are embedded as part of the Appraisal's objectives. The SAP material follows on and reflects the approach set out in the Core Strategy, which has also had the same regard to these issues.

4.3 Council policies and Best Council Plan

- 4.3.1 The Core Strategy and SAP play a key strategic role in taking forward the spatial and land use elements of the Vision for Leeds and the aspiration to be the 'the Best City in the UK'. Related to this overarching approach and in addressing a range of social, environmental and economic objectives, these Plans seek to implement key City Council priorities. These include the Best Council Plan (in particular priorities relating to 'Supporting economic growth and access to economic opportunities', 'Providing enough homes of a high standard in all sectors', 'Promoting physical activity' and 'Enhancing the quality of our public realm and green spaces' and Breakthrough Projects including 'Housing growth and high standards in all sectors' and 'More jobs, better jobs').

4.4. Resources and value for money

- 4.4.1 The proposals set out in this report incur further costs associated with a further round of public consultation. This is considered to represent better value for money than withdrawing the plan or progress it in its current form, both of which would place the investment made thus far at risk. Given the considerable costs incurred to date progressing the Plan through Examination with modification is considered to be the best outcome in terms of resources and value for money.

4.5. Legal Implications, Access to Information and Call In

- 4.5.1 The report is not eligible for call-in as it is for information only.

4.6. Risk Management

- 4.6.1 Adoption of the SAP is essential to enable the Council to demonstrate that sufficient land will be available when needed to meet the need for housing in Leeds. Without an up to date plan the 'presumption in favour of sustainable development' by the Government means that any Local Plan or Neighbourhood Plan will have less weight and that speculative development may be acceptable, regardless of any previous positions of the authority. The further the Plan progresses, the more

material weight can be given to it. The proposals outlined in this report ensure that, whilst the Plan will now incur limited delay, when set against the alternatives there are far fewer risks.

5 Conclusions

- 5.1 This report has set out an update to the Site Allocations Plan. By taking a revised approach, the City Council is proposing not to release land from the Green Belt for 6,787 homes. This means that over half of the Green Belt land originally earmarked for housing will now remain in the Green Belt as a Broad Location until such a time as the CSSR sets a new housing requirement and the SAP can be reviewed.

6 Recommendations

- 6.1 Joint Plans Panel is invited to note the report.

Appendix 1 – Proposed Changes to Site Allocations Plan Submission Draft Green Belt housing allocations

HMCA	Site Ref.	Address	Homes	Phase	Proposed Change
Aireborough	HG2-01	New Birks Farm, Ings Lane, Guiseley	160	2	Retain housing allocation. Change to Phase 1.
Aireborough	HG2-02	Wills Gill, Guiseley	133	2	Retain housing allocation. Change to Phase 1.
Aireborough	HG2-03	Shaw Lane (land at), Guiseley and Banksfield Mount, Yeadon	234	2	Designate as Broad Location
Aireborough	HG2-04	Hollins Hill and Hawkstone Avenue, Guiseley	80	2	Retain housing allocation. Change to Phase 1.
Aireborough	HG2-05	Land at Coach Road, Guiseley	83	2	Designate as Broad Location
Aireborough	HG2-09	Land at Victoria Avenue, Leeds	102	2	Retain housing allocation. Change to Phase 1.
Aireborough	HG2-10	Gill Lane, Yeadon	155	2	Designate as Broad Location
Aireborough	HG2-12	Woodlands Drive, Rawdon	25	2	Designate as Broad Location
East	HG2-119	Red Hall Playing Offices & Playing Field	50	1	Retain housing allocation.
East	HG2-123	Colton Road East	14	2	Retain housing allocation. Change to Phase 1.
East	HG2-174	Wood Lane – Rothwell Garden Centre	31	2	Retain housing allocation. Change to Phase 1.
East	MX2-38	Barrowby Lane, Manston	150	2	Retain housing allocation. Change to Phase 1.
North	HG2-36	Alwoodley Lane, Alwoodley, LS17	285	2	Retain housing allocation. Change to Phase 1.
North	HG2-38	Dunstarn Lane (land south), Adel LS16	68	2	Retain housing allocation. Change to Phase 1.
North	HG2-41	South of A65 from Horsforth and Rawdon RA to Crematorium	777	1	Designate as Broad Location
North	HG2-42	Broadway and Calverley Lane, Horsforth	18	2	Retain housing allocation. Change to Phase 1.
North	HG2-43	Horsforth Campus	134	2	Retain housing allocation. Change to Phase 1.
North	HG2-46	Horsforth (former waste water treatment work)	53	1	Retain housing allocation.
North	HG2-49	Off Weetwood Avenue, Headingley, Leeds	30	2	Designate as Broad Location
Outer North East	HG2-24	Former Sacrament Church, Keswick Lane, Bardsey	10	3	Designate as Broad Location

HMCA	Site Ref.	Address	Homes	Phase	Proposed Change
Outer North East	HG2-25	Farfield House, Bramham	14	3	Designate as Broad Location
Outer North East	HG2-26	Scarcroft Lodge	100	1	Retain housing allocation.
Outer North East	MX2-39a	Land at Parlington	792	1	Retain housing allocation on revised boundary with revised capacity
Outer North East	MX2-39b	Land at Parlington	1058	1	Designate as Broad Location
Outer North West	HG2-15	Green Acres and Equestrian Centre, Bramhope	42	3	Designate as Broad Location
Outer North West	HG2-16	Creskeld Lane, Bramhope – land to the rear of no.45	23	3	Designate as Broad Location
Outer North West	HG2-17	Breary Lane East, Bramhope	87	3	Retain housing allocation. Change to Phase 1.
Outer South	HG2-173	Haighside, Rothwell	578	2	Designate as Broad Location
Outer South	HG2-174	Wood Lane – Rothwell Garden Centre LS26	52	2	Retain housing allocation. Change to Phase 1.
Outer South	HG2-175	Bullough Lane – Haigh Farm (land adjacent to), Rothwell LS26 0JY	222	2	Retain housing allocation. Change to Phase 1.
Outer South	HG2-177	Alma Villas (site at), Woodlesford LS26 8PW	12	1	Retain housing allocation.
Outer South	HG2-179	Fleet Lane/Eshald Lane (land at), Oulton LS26 8HT	40	2	Retain housing allocation. Change to Phase 1.
Outer South	HG2-180	Land between Fleet Lane and Methley Lane, Oulton	322	2	Retain housing allocation. Change to Phase 1.
Outer South	HG2-181	Land at Leadwell Lane, Robin Hood	60	3	Designate as Broad Location
Outer South	HG2-183	Swithens Lane, Rothwell	85	2	Retain housing allocation. Change to Phase 1.
Outer South	HG2-184	Westgate Lane, Lofthouse	50	3	Designate as Broad Location
Outer South	HG2-185	Church Farm, Lofthouse	188	3	Designate as Broad Location
Outer South	HG2-186	Main Street, Hunts Farm, Methley	25	3	Retain housing allocation. Change to Phase 1.
Outer South East	HG2-124a	Stourton Grange Farm South, Selby Road, Garforth	1090	1	Retain housing allocation on revised boundary with revised capacity
Outer South East	HG2-124b	Stourton Grange Farm South, Selby Road, Garforth	1224	1	Designate as Broad Location
Outer South East	HG2-126	Micklefield Railway Station Car Park (land to north of), Micklefield	18	3	Retain housing allocation. Change to Phase 1.

HMCA	Site Ref.	Address	Homes	Phase	Proposed Change
Outer South East	HG2-127	Newtown Farm, Micklefield	42	3	Designate as Broad Location
Outer South East	HG2-128	Selby Road/Leeds Road, Kippax	40	3	Designate as Broad Location
Outer South East	HG2-131	Whitehouse Lane, Great Preston	40	3	Designate as Broad Location
Outer South East	HG2-132	Brigshaw Lane (land to east of), Kippax	76	3	Designate as Broad Location
Outer South East	HG2-133	Ninevah Lane, Allerton Bywater	65	3	Retain housing allocation. Change to Phase 1.
Outer South West	HG2-136	Whitehall Road (south of) - Harpers Farm	279	2	Retain housing allocation. Change to Phase 1.
Outer South West	HG2-144	Westfield Farm, Drighlington	17	3	Designate as Broad Location
Outer South West	HG2-145	Bradford Road/Wakefield Road Gildersome	393	3	Designate as Broad Location
Outer South West	HG2-147	Highfield Drive/Harthill Lane (land off), Gildersome	76	3	Designate as Broad Location
Outer South West	HG2-148	Gelderd Road/M621, Gildersome	203	3	Designate as Broad Location
Outer South West	HG2-150	Churwell (land to the east of)	205	2	Retain housing allocation. Change to Phase 1.
Outer South West	HG2-153	Albert Drive Morley	121	1	Retain housing allocation.
Outer South West	HG2-159	Sissons Farm, Middleton LS10	222	1	Retain housing allocation.
Outer South West	HG2-165	Thorpe Hill Farm, Lingwell Gate Lane, Thorpe	57	1	Retain housing allocation.
Outer South West	HG2-166	Long Thorpe Lane (land off), Thorpe, Wakefield WF3 3BZ	17	1	Retain housing allocation.
Outer South West	HG2-167a	Old Thorpe Lane (land at), Tingley	207	3	Retain housing allocation. Change to Phase 1.
Outer South West	HG2-167b	Old Thorpe Lane (land at), Tingley	412	3	Designate as Broad Location
Outer South West	HG2-170	Land off Haigh Moor Road, Tingley	41	3	Designate as Broad Location
Outer South West	HG2-171	Westerton Road East Ardsley	195	3	Designate as Broad Location
Outer South West	HG2-233	Land at Moor Knoll Lane East Ardsley	11	3	Retain housing allocation. Change to Phase 1.
Outer West	HG2-53	Calverley Cutting / Leeds Liverpool Canal, Apperley Bridge	32	1	Retain housing allocation.

HMCA	Site Ref.	Address	Homes	Phase	Proposed Change
Outer West	HG2-54	Upper Carr Lane (land off), Calverley	18	3	Designate as Broad Location
Outer West	HG2-55	Calverley Lane, Calverley	18	3	Designate as Broad Location
Outer West	HG2-56	Rodley Lane (land at) - Calverley Lane	53	2	Designate as Broad Location
Outer West	HG2-59	Land at Rodley Lane	17	2	Designate as Broad Location
Outer West	HG2-63	Woodhall Road (land adjoining) - Gain Lane, Thornbury BD3	196	1	Retain housing allocation.
Outer West	HG2-65	Daleside Road, Thornbury,	89	1	Retain housing allocation.
Outer West	HG2-68	Waterloo Road (land at), Pudsey LS28	28	1	Retain housing allocation.
Outer West	HG2-69	Dick Lane, Thornbury	206	1	Retain housing allocation.
Outer West	HG2-71	Land off Tyersal Road, Pudsey	33	1	Retain housing allocation.
Outer West	HG2-72	Land off Tyersal Court, Tyersal	40	1	Retain housing allocation.
Outer West	HG2-76	Hough Side Road Pudsey	200	1	Designate as Broad Location
Outer West	HG2-80	Acres Hall Avenue Pudsey	62	1	Designate as Broad Location