

PART 1: YOUR DETAILS

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PARTS 2 and 3 - WHAT COMMENTS DO YOU WISH TO MAKE

This document covers CPRE's comments on the CSSR, firstly by setting out the rationale for our comments, based on our own policy position, and then by commenting on the specific policies. We have used the 2017 SHMA as supporting evidence, but we have not critiqued the SHMA itself, nor the Sustainability Appraisal. This is due to time constraints and should not be interpreted as support for the content of those documents.

Tests of Soundness

In CPRE's view the Core Strategy, as amended by the CSSR, would be unsound in the following ways:

- It is not positively prepared, in that it seeks to meet objectively assessed housing need in only numerical terms, and has not made proper use of the available evidence - as set out in the SHMA - in order to meet the types and spatial patterns of housing need across Leeds over the plan period. This risks facilitating unsustainable forms of development.
- It is not effective, in that this numerical focus is unlikely to deliver housing to the people who actually need to be housed, especially in affordable tenures and with reference to the aging population.

Our Comments

We have tested the CSSR against our key policy concerns, which are as follows:

- Does the Plan enable sustainable patterns of development, by planning for the right types of housing in the right places and making most effective use of land?
- Does it provide the best potential for sustainable modes of travel?
- Does it achieve place-making by addressing shortcomings in the sustainability of settlements and neighbourhoods - eg by prioritizing affordable housing, brownfield land and/or green space provision?
- Does it maintain and enhance people's access to open space, countryside and reduce their exposure to pollution?
- Does it require all new development to be as sustainable as possible in terms of resource use and climate change response?

Many of these concerns are mirrored by the housing growth principles identified in CSSR para 4.62, which is very encouraging. However, the revised policies do almost nothing to contribute to fulfilling these principles, which is deeply disappointing, and a missed opportunity to remedy the shortcomings of the adopted Core Strategy.

SHMA evidence

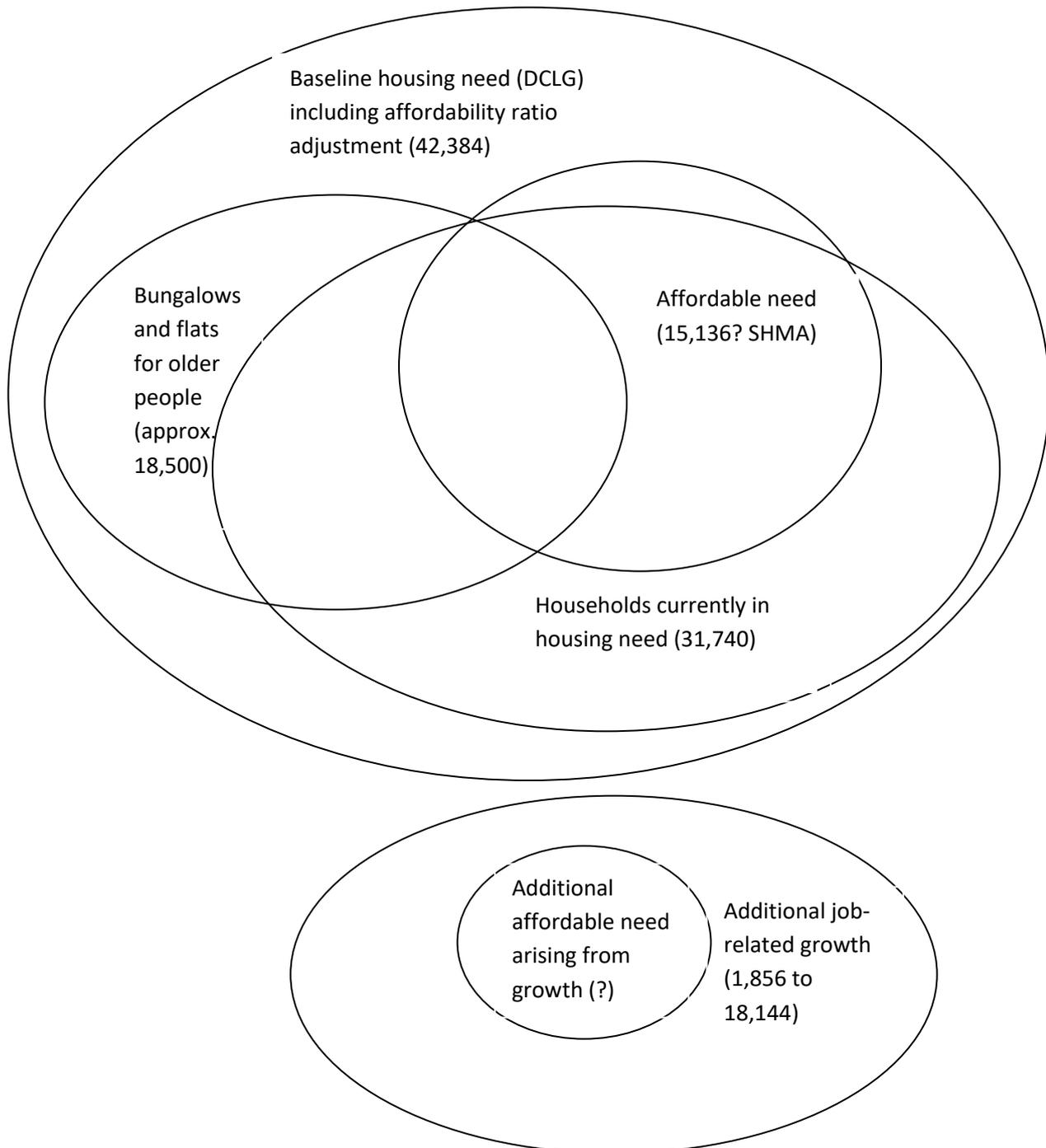
The 2017 SHMA considers that the OAN for 2017-2033 is between 44,240 and 60,528. 44,240 (2,765pa) is the adjusted demographic baseline, and the 15% market signals uplift gives a figure of 50,320 (3,145pa). 60,528 (3,783pa) therefore represents a top-end economic growth scenario. It is important to bear in mind that the new DCLG method for calculating housing need, which gives a figure of 2,649pa, includes any job-related growth that is associated with the existing economic growth trends, since these are built into the household projections. Therefore we can see that the top-end growth scenario represents 43% more job-related housing growth over the plan period than the long-term historical trends would suggest.

SHMA Table ES1 suggests a tenure split with 25% affordables, based on past delivery trends but using the top-end annual OAN of 3,789. This logic appears flawed, because such a high OAN would only arise if job-related growth were much greater than past trends; so it is not possible to assume that past trends would still pertain to affordables. Indeed, since higher economic growth rates tend to generate increased housing costs, we would expect the proportion of affordable need to rise significantly as growth increases.

77.6% of older people want to move to a bungalow or a flat. 15% of all older people (18,255) want to move, so there are about 14,000 older people currently wanting to move to a bungalow or flat that is suitable for them. If similar proportions apply to the growing population of over 65s, then we could surmise that around 18,500 older people would need a bungalow or flat between now and the end of the plan period. Even if most of those remained in two-person households, addressing their needs accounts for around 10,000 homes by 2033.

If the affordable provision in Table ES1 of 946pa is an accurate representation of affordable need, that would account for 15,136 homes by 2033. 31,740 existing households are currently in housing need.

Figure 1: Visualising the make-up of housing need as described in the SHMA



Our Figure 1 shows very clearly that:

- The principle focus of SP6 should be meeting the requirements of households that are in need, currently and in the future;
- Affordable needs and the needs of older people, in combination, make up a very significant proportion - possibly a majority - of the total baseline need;
- Additional job-related growth will bring with it an additional affordable need.

In CPRE's view, each element in our Figure 1 should be explicitly addressed if the Plan is to fulfil its objective of meeting housing need over the Plan Period. It is also important to consider that the segmentation of need that our Figure 1 describes could be applied separately to each HMCA, as well as to the city as a whole, and we would advocate that approach.

How well do revised policies SP6, SP7 and H5 address housing need?

In our view, these policies taken together address housing need very poorly, for a number of reasons.

- The relationship between the SHMA's OAN figure, the DCLG calculation and the numerical housing requirements in SP6 is opaque, and it is virtually impossible to follow the logic from the SHMA scenarios to the 51,952 net requirement. It is therefore also difficult to understand how much of the proposed requirement is intended to support above-trend job growth, as opposed to meeting baseline need.
- Neither SP6 nor associated policies address how the different elements of housing need will be addressed within the overall requirement figure. There is therefore no evidence that the delivering the numerical requirement will be meaningfully focussed on addressing any identified needs or, indeed, any specific growth aspirations.
- SP6 sets out how land will be allocated based on largely subjective locational criteria and on mitigating impacts, instead of giving any explanation of how identified housing needs are to be met.
- SP7 sets out a distribution that is principally governed by the desire to provide a portfolio of sites, rather than by any clear expectation that spatial variations in housing need will be addressed. SP7 therefore also undermines SP6, because SP6 defers to SP7 in offering any understanding of how the Plan's spatial objectives will be met.
- Neither SP6 nor H5 give any expression of the amount of affordable housing that is within the overall requirement.
- Comparing the distribution in SP7 with the zoning in H5, it is impossible to tell whether the 25% affordable provision indicated in the SHMA is correct, or whether H5 offers any realistic prospect of delivering it. The SHMA indicates that the majority of existing households in housing need are within the inner areas, but this is where affordable

percentages are expected to be lowest according to SP7. Since we cannot ascertain the proportion of existing need that is for affordable dwellings, and given the opacity of most of the numbers provided in the Plan and evidence base, it is impossible to see how 7% provision in inner zones could correlate to a 25% provision across Leeds as a whole.

Para 34 of the revised draft NPPF states: *“Plans should set out the contributions expected in association with particular sites and types of development. This should include setting out the levels and types of affordable housing provision required...”* The CSSR as drafted cannot fulfil this requirement, because there is no relationship made between the housing distribution, the allocation of sites, and the achievement of the levels and types of affordable housing needed.

Considering that the meeting of housing needs is used in the Plan to justify greenfield site allocations, and to demonstrate exceptional circumstances for Green Belt review, it is important to consider the consequences of pursuing a generalized numerical target without any supporting evidence or policy for how specific needs are to be met. In our view, the consequence is simply that the wrong types of housing may be delivered, and development sites used up (both brownfield and greenfield) without people’s actual needs being met. Indeed, development of the wrong types of housing may well make meeting genuine needs more difficult, with the socio-economic impacts that will entail; that would be an unsustainable outcome. The Plan cannot be found sound if it can facilitate unsustainable development.

We also note, with great disappointment, that no attempt has been made to review and improve the Core Strategy’s approach to residential densities. If the objective of revised NPPF to make efficient use of land is to be achieved, then this must be addressed.

New Policies H9 and H10

We welcome and support these new policies, which are crucial to ensuring that new homes are fit for purpose.

Policy G4

We support the inclusion of this policy, as provision of good quality, accessible green space is essential to a sustainable pattern of development.

In line with our representations on the Site Allocations Plan, CPRE considers that this policy will only be sound, and deliver sustainable development, if it is supported by:

- A city-wide spatial plan for both existing and new green space, to which new provisions and S106 contributions should be configured to implement;
- A strong policy (of equivalent strength and permanence to Green Belt) to ensure that urban green spaces are not depleted by future development.

It should be noted that the proposed net housing target of 51,952 homes, if compliant with G4, would deliver in the region of 200 hectares of green space. This is a potentially strong opportunity to provide strategic green space, which may in some areas be more valuable than smaller green spaces within developments.

Local Green Space Designations do offer a policy tool to protect green spaces from inappropriate development, and G4 should make specific reference to this.

Policy G6

As in the case of G4, this policy should move from the no-net loss approach it currently presents, to a net-gain approach that is supported by a city-wide spatial plan for green space. Otherwise the policy will not be effective against the overall objective of protecting and enhancing green space.

Policy EN1

Whilst we support this policy as far as it goes, it is self-evident that the Local Plan is an essential tool in shaping the built environment's contribution to climate change response. Given the Local Plan's very limited influence over existing development, it must therefore do everything possible to ensure that new development is not just carbon efficient in itself, but that it has a net effect in reducing the carbon emissions of settlements and travel patterns. Otherwise, carbon budgets cannot possibly be met.

This policy as drafted is therefore not effective in relation to the objectives and obligations outlined in para 5.5.38 to 5.5.41 of the CSSR. It needs to be supported by place-based carbon budget evidence so that new development can show its contribution to net carbon reduction.

Policies EN4 and ENV8

We support these policies.

PART 4 - IS THE PLAN LEGALLY COMPLIANT?

In our view, in line with our comments on Policy EN1, the CSSR will not make an adequate contribution to meeting carbon budgets, and will therefore not fulfill the requirements of the Climate Change Act 2008. As this Act is embodied in the Town & Country Planning Regulations 2012, it is our position that the Plan is not legally compliant in this regard.

PARTS 5 & 6

CPRE would welcome the opportunity to participate in the Public Examination, and ask to be kept informed at all stages of the Plan's progress.
