

**Representation for Leeds Core Strategy,
Session 18, Housing Delivery and Supply, 14th May
Aireborough Neighbourhood Forum**

1. Sources of Supply

The NPPG states that the following sources can contribute towards meeting housing need¹;

- i.empty homes,**
- ii.student accommodation, whether it consists of communal halls of residence or self-contained dwellings and whether or not it is on campus and,**
- iii.housing provided for older people, including residential institutions in Use Class C22.**

Should, as proposed by the Council, the monitoring table be modified to take these sources of supply into account and what implications, if any, would this have on the need to identify sites for 66,000 new dwellings as set out in Spatial Policy 6?

As the NPPG now gives the above guidance, than obviously it should be included in LCC's LDF monitoring table.

Empty Homes

The ANF, along with other groups in Leeds, has long said that empty homes are an important source of housing to meet need. This is especially the case when it is considered that many of the empty homes are firstly in places of housing shortages eg City and Hunslet, and, secondly in areas where doing up the empty homes would substantially help in the area's regeneration and thus increase viability for further house building on brownfield sites. So, the inclusion of empty homes in what counts towards the new housing target is not only welcome, but sensible.

With regard to the implications for the siting of the 66,000 new dwellings in Spatial Policy 6 and 7; we think that, in line with Ministerial Guidelines dated 6 March 2014 (regarding housing need not outweighing harm to greenbelt, and the need for supporting infrastructure), that the number of empty homes brought back into use, should reduce the need for greenbelt sites (2012 greenbelt sites prior to any greenbelt review), especially those in areas of huge infrastructure strain already eg Aireborough. This would then be in line with LCC's strategy at para 12 - to regenerate neighbourhoods and protect the distinctive green character of the City.

LCC estimate that 400 empty homes could be brought into use each year of the plan, which would make a total of 6,800 houses between 2012, and 2028 – we are not sure if these are both council and private homes, but both should be included. We feel that this is an underestimate of the number that could be brought back, considering there are in excess of 15,000 empty homes in Leeds, over 6,000 of those being classed long-term empty (source: Leeds only monitor of empty homes). We also feel that Leeds should consider initiatives to encourage small developers, and those who want to renovate or self-build to help regenerate empty property.

Housing for Older People

Aireborough has need of housing for people post retirement who already live in the area; thus the counting of this category of home, plus Class C22, towards the 66,000 new housing target, is sensible and welcome. The inclusion of this type of housing has an implication for site allocations as smaller sites are needed; we would wish LCC to propose how they intend to incorporate this factor into the SHLAA process in conjunction with neighbourhood plans, where they are being prepared. This also has an implication for the size of windfall sites in the LDF, ie they should be smaller. This category of home also has implications on infrastructure, and needs to be planned holistically. The other advantage of including this category of home is that they tend to be built by smaller, more design conscious developers, and thus alleviate some of the supply side constraints identified later in this response.

2. The 'step up'

Spatial Policy 6 sets a target of 70,000 (net) new dwellings to be built in Leeds between 2012 and 2028 at a rate of 3,600 per annum(pa) up to 2016/17 and 4,700 pa thereafter (the step up). Proposed main modification MM6 would remove this step up or phasing of delivery and the commentary accompanying the proposed modification states that this is because it is not considered to be justified by the evidence submitted to the examination so far. The step up and the evidence the Council produced at that stage to support it were debated at the earlier hearings and those matters will not be discussed again. Representors should concentrate on the submissions and evidence contained in the Council's statement (S18/1) and address whether this evidence justifies the step up set out in

The evidence in S18/1 (see below) makes it obvious that

- 1) LCC needs to adjust housing supply via a 'step up' system to be able to achieve its core strategy based on market signals.
- 2) The 70,000 net new housing figures is not viable for developers, not sustainable for local communities, and undeliverable economically. This is due to a range of evidential factors many on the supply side. Leeds themselves say – **"To that end they [the Developers] are not planning and cannot plan to deliver the Core Strategy" (Para 25).**

The bottom line is, that the undeliverability of the 70,000 housing target alone should make the LDF null and void. As we saw in October 2013 LDF Hearing sessions, LCC has a range of housing need scenarios: the 70,000 net target chosen is, by LCC's own admission, aspirational; it is also based on highly debatable employment targets. Actual housing need is more likely to be around 45,000; according to the evidence in S18/1 this also seems to be far more in line with what can be delivered viably and sustainably. 45,000 is thus a plan-led approach figure.

The current unachievable 70,000 net housing figure is made impossible to do within NPPF and NPPG regulations, if the MM6 proposal to take out the step up mechanism goes ahead. Taking out the step up means that LCC will have to have in its 5 year land supply far more land than Developers can possibly build on – by their own admission. Developers will thus 'cherry pick' the more profitable sites, regardless to the serious threats to local wellbeing caused by developing those sites – as we

are already evidencing in Aireborough with a growing catastrophe in schooling. Local children now cannot walk to school because of lack of places, so have to travel further afield by car which only adds to the congested roads. Fraught parents then have to travel yet more miles in congestion, or on overcrowded transport, to reach their place of employment because there are limited local jobs as all the employment land has had housing built on.

The result of this situation is, and increasingly will be, conflict in local neighbourhoods, higher risk in land investment meaning even higher profit levels for the 'de-risking' of bank loans, and falling house prices (with people in negative equity) in the areas affected, as buyers eventually catch up with the reality of what they are buying into. We are already seeing in Aireborough 'house-buyer' anger, that the 'value proposition' they were sold by the developer is not materialising in reality; the area is overcrowded, and Developers are not fulfilling S106 agreements to improve place-making – they have said themselves, infrastructure and community facilities are not their concern, they sell houses !! When this becomes better known, house prices will drop and viability will become a growing issue, even in the 'cherry-orchard' areas. This is not socially sustainable; it is economic illiteracy.

Further, as the impossible annual targets are not met by the Developers, (and what is the incentive or sanction on them for not achieving targets?) this process just goes on leaving brownfield sites in a state of desolation adversely affecting the living standards of local communities around them.

Besides these huge issues, the target and 5 year land supply situation is not even in line with the Ministerial Guidelines of 6th March 2014 regarding harm to greenbelt and supporting infrastructure. Thus this alone means the LDF is not justified, effective or consistent with the NPPF or the NPPG !!

The evidence

- *“Leeds is planning for more housing growth within its boundaries than any other local authority in England but the loss of the ‘step-up’ puts **substantial pressure** on the Council”* **para 7.** As well as the three areas of substantial pressure given by LCC, we would also add from Aireborough’s experience to date, pressure on supporting infrastructure, and pressure on green infrastructure.
- *“The importance of market signals in managing housing growth and delivery”. So where are the market signals that Leeds currently needs to double its housing supply both annually and over the planning period. **Para 23 says** “there is a pessimistic market signal from the industry about the delivery and output of houses”*
- *“They [house builders] are only building to numbers that they can sell, and state that this level is around 20 to 30 dwellings per annum. At the moment there are just over 80 outlets being run in Leeds. In order to meet the requirements at the stated sales rate there would need to be between 146 and 218 outlets”* **Para 24.** Thus the level of houses that the 10 volume housebuilders can actually achieve is a supply side constraint that negates the targets.

- The fact that increasing supply in this way, will reduce prices and thus profits, and thus make more sites unviable from a perspective of the Developers 20% profits **Para 24**. This is without taking the effect of S106 and CIL contributions on profits into account.
- The site allocations issues and options consultation will have revealed huge infrastructure issues in areas such as Aireborough, **Para 31**, and there is currently no plan for remedying what is needed already, let alone to support any new development, **Para 31**. So, the deliverability of the targets in line with the NPPG and Ministerial Guidelines cannot be evidenced.

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On behalf of Aireborough Neighbourhood Forum

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