

# AIREBOROUGH NEIGHBOURHOOD DEVELOPMENT FORUM



## Response To Core Strategy Selective Review Consultation February/March 2018

**We do not believe the current CSSR is sound due to the following factors.**

### **AMENDED POLICY SP6 (HOUSING REQUIREMENT AND ALLOCATION OF HOUSING LAND)**

**Revised NPPF.** Point 4.6.3 says that SP6 draws on the Government paper “Building the Right Homes in the Right Places”. Given that this has now been superseded by the revised NPPF (March 2018) then we believe SP6 and SP7 need to ensure that legally they meet revised NPPF requirements. For example, the revised NPPF puts more emphasis on increasing densities and the use of smaller sites. There is also greater emphasis on size, type and tenure by different demographic groups (revised NPPF62) which is not in the CSSR.

**Plan Period** - The current spatial development strategy is for 2012 – 2028 see section 4.1, in addition, Point 4.6.1 says the plan is to **accommodate population growth from 2012 to 2028**. However, SP6 is now out of line with these strategic policies as it covers **housing growth over a different time period, 2017 – 2033**. This is not positive planning for sustainable neighbourhoods (4.6.2 i) without a full strategic overhaul, especially one in line with the revised NPPF. For example many developments built in the 2012 – 2017 period will not have the full supporting infrastructure in place, and development from 2028 – 2033 has no infrastructure plan or strategic policies to support it. **If the plan is to look ahead of its current strategic time frame ie 2012 - 2028, then we are of the view it should strategically plan for the current period, and then show updated forecasts for the housing requirements in the period 2028 – 2033.** SP1 vi makes it clear that the key role of infrastructure will be recognized.

**Gross Housing Requirement.** 4.6.4. This is given as 53,856 between 2017 - 2033. However, this is not the product of the net requirement of 51,952 and the demolition figure of 2,400 (150 x 16 years). The actual product of these two figures is **54,352 gross** 2017 – 2033. To be sound the figures in the core strategy need to be completely transparent in terms of how they have been arrived at. Further, the annual demolition figure has been reduced from the current 250 units pa 2012 – 2028, to 150 units pa – no explanation is given for this. The current core strategy indicates that demolitions run at about 228 units pa. For a sound plan, the evidence for housing allocations must be made a lot more clearly so that it is possible to follow progress and comment accurately on changes.

**Windfall Allocations.** 4.6.5. We understand that the data shows that the annual windfall target between 2012 – 2017 is between 3,500 and 4,000 houses. This is equal to 700 – 800 units PA rather than the current allowance of 500 units pa. With the introduction of a Brownfield register and the need for regeneration across huge areas of Leeds we think there is every justification to raise the annual windfall allowance and do that in a more strategic way using broad locations. **This is especially the case when Leeds wants to use housing targets as the exceptional circumstances for the case for Green Belt development.** A major part of the spatial strategy at SP1 and SP6 is the preferred use of PDL and regeneration sites, whilst avoiding impact on GB purposes; thus more care needs to be taken with the calculation of windfall targets for the

strategic policies to be both positive and justified. The new NPPF indicates at point 24 how brownfield registers and broad locations can be used in a spatial strategy.

It also needs to be made clear where PDL will be classed as a windfall site and when it will be a site allocation. If this is not done there is a danger that unnecessary greenfield and GB land may be required when PDL is available to meet housing needs. Perhaps, given the importance of SP7, and the challenge of providing the right mix of houses as pointed out by the 2017 SHMA (Conclusion p 15) windfall should be managed by HMCA, or Neighbourhood Plan area. We are of the view that too much regarding policies on windfall has been cut from the 2014 Core Strategy and more explanation and thought is required in the new one in line with the NPPF if regeneration is to occur in support of OAN and Housing Growth Principles.

**Housing Land Allocation Target.** 4.6.5. The target of 45,846 for housing allocations 2017 – 2033 is not clear and transparent. The OAN figure at 4.6.4 is given as 51,952 units (this is the annual target base in SP6), this should then be reduced by a relevant windfall figure to give the housing unit land allocation. If the Council is claiming that the windfall 2017 – 2033 is 8,000 then 51,952 minus 8,000 is **43,952** not 45,856 which is the figure given. As mentioned above, we feel the windfall figure should be higher at around a minimum of 12,000, which would actually give a land allocation of **39,952 units 2017 – 2033**. We are also of the view that in the interests effective delivery and monitoring strategic policies that these targets should be recalculated for the period 2012 – 2028, with an additional set of calculations made for the period 2028 – 2033.

#### **Spatial Policy 6 wording**

- The time scale is now 2017 – 2033 and thus not in line with other strategic policies especially SP1 which are for the time period 2012 – 2028.
- The PDL windfall target of 8,000 is now dwellings on ‘small and unidentified sites’, yet there is no text to explain this. PDL can be identified, and greenfield can be in small units.
- SP6 the **spatial strategy** for the sustainable and legal allocation of housing land **across the City**, has been made **subsidiary** to SP7 distribution of housing allocations by HMCA, through the use of the new word ‘*support*’ instead of ‘*achieve*’. Yet at both the 2014 Core Strategy Inspector’s hearing and in the text at 4.6.7 is says that SP7 *is indicative of and a guide to* the scale and distribution of development and thus subject to the primacy of the **spatial strategy** in SP6. This is especially important for a City wide sustainable spatial strategy as every HMCA is different in terms of need for regeneration, environmental factors, character and constraints and the policies of SP1 and SP6, let alone OAN: this fact is underlined in the Housing Growth Principles at 4.6.2. For example Aireborough is in the South Pennines National Character Area, which may well become a National Park before 2033. Such factors need to be applied in order to reach the SP7 targets, or else the explained SP7 targets (they are currently not explained) must be subject to SP6 policies through either the SAP or Neighbourhood Plans and a tailored SHMA.
- The similarity of difference between the term brownfield and PDL needs to be clarified between the text and the policy. (point ii)

#### **AMENDED POLICY SP7 DISTRIBUTION OF HOUSING LAND AND ALLOCATIONS**

**Market for Land and Local Housing Need** 4.6.6 and 4.6.7. From an analysis of the 2017 SHMA the following statement *is not supported in the evidence* and thus is not positive and does not justify SP7 “**to meet local needs throughout the District the delivery of the spatial strategy of the Core Strategy will depend upon having a wide portfolio of sites in different housing markets.**” Point 4.6.7 points out the specific HMCA’s of Leeds where there is there is the greatest housing need and land opportunities. Different HMCA have different housing needs for different groups, the subsequent need for different housing types require different sites to be viable. For example there is a requirement for family housing in

Inner Leeds (which appears to have the greatest housing need) which could use large brownfield sites, whereas Aireborough specifically needs housing for singles, downsizers and older people which are better provided on smaller brownfield regenerated sites. We are extremely concerned that site allocations are not supporting the types of housing that Aireborough needs – as identified in the 2017 SHMA and our own work – and that there are tight environmental constraints that make careful planning essential for sustainability.

#### **Housing Market Characteristic Areas That Cross LA Boundaries.** 4.6.7.

As concluded in the 2017 SHMA, LCC needs to acknowledge that the Housing Market Area for Leeds has changed since the last SHMA, and in some areas such as Aireborough the actual market HMCA is shared with other LA's: in our case the Aireborough HMCA is shared with the Wharfedale part of Bradford. (see 2017 SHMA 2.8, 2.9, 2.28). With the revised NPPF (26-29) stressing the need for strategic planning between LA's the CSSR is not planning positively without taking account of this fact.

#### **Spatial Policy 7 – Detail**

**Size, Type, and Tenure.** This policy is an important part of delivering the Leeds strategic spatial strategy in SP1 and SP6 as well as the Housing growth principles and meeting the OAN and key challenges as outlined in the SHMA 2017 - let alone other environmental considerations such as Green Belt and infrastructure . However, there is absolutely no explanation of how the SP7 indicitave/guide targets relate to the evidence or are planned to fulfill the requirements of housing need including size, type, tenure and affordability by group (revised NPPF62). We are of the view that for positive planning more detailed housing requirements by HMCA are required, and that these need to be done in conjunction with Neighbourhood Plans. There is no mention of the link between SP7 and local evidence from communities.

**Strategic Spatial Strategy.** As we mentioned above the relationship between SP 6 and 7 in terms of sustainable housing delivery is not clear and thus not effective.

**Targets are not justified and not effective.** In spite of changes in the housing market, housing need, and the evidence from actual housing delivery between 2012 and 2017, the HMCA targets have not changed in any way. This is particularly an issue when the suggestion is that the revised core strategy runs from 2017 – 2033 and thus ignores over and under delivery against SP7 targets in the first 5 years of the plan. The result of this means that the spatial strategy in SP1 and SP7 is unlikely to be met let alone the housing need identified in the SHMA. An example of this is that Aireborough has over achieved delivery against its 3% target in the first 5 years of the plan – our delivery rate is around 5% against a target of 3%. Yet it is now suggested that we ignore this – even through relevant infrastructure has not been planned let alone provided - and have to provide a further 3% of a new target, in a highly constrained area with very specific housing needs on very specific sites. Meanwhile, HMCA such as East Leeds, Outer South East and the City Centre have substantially under delivered in the first 5 years, yet still have the same target in the new timeframe – despite the fact these are all regeneration areas which are supposed to be the focus of the spatial strategy. The CSSR needs to continue the plan for 2012 – 2028, and have a supplement for housing requirement going forward from 2028 – 2033.

#### **GREEN SPACE**

We welcome the improvements to this policy area, but feel much more could be done to ensure that the need for quality in green space provision and maintenance is achieved, and that the Leeds/West Yorkshire strategic green infrastructure and habit network is enhanced. The GI and ecology networks should be a key factor mentioned at 5.5.9, and 5.5.10. In addition, there does not appear to be mention at this early point of the Leeds Parks and Countrysides' own GI strategy, this should surely be the foundation of green space provision together with Neighbourhood Plans and Local Green Space designations?

There should be more mention of the use of Neighbourhood Plans – 5.5.15 being one example.

Maintenance can be done through a growing number of vehicles including trusts, community interest companies and Friends Groups, this needs to be reflected at point 5.5.19.

Off-site contributions for projects at 5.5.25, should refer to Neighbourhood Plans.

#### **Policy G4 Wording**

- Should it not read, “*where the factors of paragraph 5.5.14*” rather than 5.5.4.
- As a Neighbourhood Plan is a key planning document and looks at cumulative effects and placemaking we would like to see reference to it at the top of the list, a)i, rather than at the bottom of the list a)iv
- ‘*Arrangements for ongoing maintenance must be agreed with the local community/Parish Council when plans are approved.*’ The maintenance of green space is a growing issue in communities and there are a variety of ways of looking after such spaces by a variety of mechanisms eg LA, trusts, community interest companies, Friends Groups. Further, it should not be the case that new housing development residents are left with the burden of maintenance costs when the space is to be used by the entire community (point c), as this only creates resentment. If maintenance plans are not agreed at the outset, then they should be outlined and a reasonable timetable for their agreement must be agreed and kept to. Where possible Neighbourhood Plans should give indications of how new green spaces are to be provided and maintained in a community.
- Statements are required along the following lines to ensure the quality of green space in both the community and across Leeds. This is essential if hard to maintain, ‘bitty’ green space provision is not to occur as has been the experience of many communities to date. *On site Green Space should positively contribute to the placemaking of the whole community through its design and access, this should be thought about at the pre-application stage and be part of the planning permission. Its role in strategic green infrastructure and habitat networks should also be made clear at the outset.*
- The provision of contributions for off-site green space is totally inadequate and will not lead to quality green space that enhances communities. Firstly, this should contain reference to Neighbourhood Plans providing a guide to what, where and how much it might cost. If there is no Neighbourhood Plan or Parish Council, then the provision should be based on a community consultation on what is required. This should be done as part of the planning applications. Part of the pre-application consultation should also be with LCC’s own Parks and Countryside division who have plans for strategic green space areas such as North West Leeds Country Park – these seem to be totally ignored in the Core Strategy. Leading on from this there should be linked plans to strategic green infrastructure and habitat networks.

#### **COMMENT ON BACKGROUND PAPER - 2017 SHMA**

- We note this is still in draft.
- SP7 does not appear to have used the information in the 2017 SHMA to calibrate the type, spatial strategy and quantum for sustainable development across the City and beyond. For example, the point that the Aireborough HMCA is shared with the Wharfedale HMCA of Bradford is not accounted for.
- We understand that a SHMA for each HMCA is being produced – this certainly needs to happen in order for the strategic spatial strategy in SP6 and SP7 to be properly calibrated. This is especially the case with getting targets in SP7 correct.

#### **CONCLUSION**

In conclusion we do not believe the CSSR is sound with these changes, and have made some suggestions for how we believe soundness can be achieved. We would like more information on legal compliance with the revised NPPF. Our main concerns in relation to the Aireborough Neighbourhood Plan are

1. The delivery of the specific types of house that are needed in Aireborough given constraints. We do not believe that the CSSR will achieve this and is thus neither positive nor effective. SP7 needs to be far more detailed at an HMCA level and backed by up to date evidence.
2. The lack of transparency in housing requirements and housing allocation figures. This is neither positive nor justified, and may not be legal. A detailed background paper should be provided of relevant calculations and changes made to current gross and net figures.
3. The discrepancies between the SHMA, spatial strategy and policies SP1, SP6 and SP7. This suggests that housing delivery will not meet housing need and sustainable development, especially as outlined in the revised NPPF. HMCA SHMAs need to be provided as was planned, and translated into the relevant strategic policies.
4. The issues caused by moving the plan from 2012 – 2028 to 2017 – 2033, especially in relation to the delivery of strategic spatial strategy, and housing allocations for Aireborough and other HMCA. The CSSR should be for the period 2012 – 2028, with additional information given for 2028 – 2033.
5. The focus of Green Space provision should be far more strategic to ensure quality and placemaking are achieved and sustained.

We wish to have updates on the CSSR and to speak at any planning inspector hearings.

Yours sincerely

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**For and on behalf of Aireborough Neighbourhood Development Forum**

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