

Briefing Note for All Members

Subject: Site Allocations Plan - Post Hearing Notes from the Inspectors

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Purpose of Note

1. The Site Allocations Plan (SAP) Inspectors have released a post-hearing note and (following a letter from the Council seeking clarification) a further response, which together provide interim views on broad locations/green belt and offers guidance on the next steps. This is the first feedback received on the SAP and provides a positive way to move the process forward. They are available on “examination new” section of the SAP [web-site](#).

Background

2. Stage 2 of the SAP was considered by two independent government inspectors at a public examination in July and August. The Inspectors held hearing sessions at the Civic Hall over 16 days, involving 470 participants, 36 Council witnesses and up to 60 people “around the table” at any one time. Members will recall that other elements of the SAP, including employment land, green space, shopping centres and Gypsies, Travellers and Travelling Showpeople, were heard at Stage 1 hearings in October 2017.
3. The initial submission of the SAP was in May 2017 and the process was paused between Stage 1 and Stage 2 to allow for amendments to the release of land from the Green Belt. The initial direction from the Inspector was that the SAP should set out locations for future housing, as set down by the Adopted Core Strategy (2014), which stated a need to allocate 66,000 new homes in Leeds between 2012 and 2028.
4. The Council amended the housing element of the SAP so as to reflect lower overall housing targets on the basis of new evidence and the publication of revised Government Guidance in late 2017.
5. The outcome of this was to provide protection for 33 sites in the Green Belt, which had previously been identified as being the locations for 6,450 future homes. The Council identified these as “broad locations for future growth” (remaining in the Green Belt) so that it could both retain their Green Belt protection and identify a pool of future land, which complied with the advice to meet land for 66,000 homes. The Inspectors advised that the Council should carry out further consultation on the changes and that the plan could be re-submitted on this basis. This was carried out in January and February of 2018 with a revised submission plan agreed by Council in March 2018.

Green Belt

6. The initial views of the Inspectors are that the Council's approach to reducing Green Belt release, in light of the likely reduction in housing growth, is the correct one, and that:-
 - given that national policy attaches great importance to the Green Belt and only envisages altering boundaries in exceptional circumstances, *significant* releases of land from the Green Belt would not be justified at this stage
 - the Council's emerging work on housing need identifies a lower housing trajectory
 - to that end, *significant* releases of land from the Green Belt would not be justified at this stage
 - there remains uncertainty about what the need figure (and requirement) will be through the CSSR examination process
 - it is therefore pragmatic and sound to only provide housing supply, including any Green Belt release required, for years 1 to 11 (i.e. up to 2023)
 - the Plan should be subject to a review process no later than 31st March 2023, to bring it in line with the Core Strategy Selective Review
7. In effect, and following on from their initial thoughts at the hearing sessions, the Inspectors have indicated that it is not justified to have broad locations in the SAP and have asked the Council to carry out further work to remove these from the plan (and retain the land as Green Belt) along with the removal of any references to phasing. At this stage all other allocations for housing would remain as proposed.

Procedure

8. The Inspectors remain keen to ensure no unnecessary delays at this juncture and have clarified the procedure moving forward. The initial part of the Inspectors note raises and deals with a procedural matter; the impact of which requires the Council to re-present the amendments contained in the revised submission plan as main modifications to the plan. This work is underway, alongside a series of actions set out in the Inspectors weekly action notes (on the Examination web-site as [EX52](#)). The headlines from this work were discussed at Development Plan Panel meeting on 11th September.
9. The Council has committed to providing a set of main modifications to the Inspector by the end of October, which once considered by the Inspector, alongside any modifications they require, will be subject to further consultation, following approval by Executive Board in due course.
10. At this stage the Inspectors have provided no findings on specific sites. Should they do this as part of their modifications, they will be asking the Council to find alternatives within the same HMCA, as was specified at the hearing sessions.

Conclusions

11. The Inspector's interim views provide a welcome and practical clarification on the procedure moving forward and on the status of broad locations in the SAP. Members of Development Plan Panel will consider the interim views at a meeting on 16th October.