Strategic Housing Land Availability Assessment

2019 Update

Main Report
1. **Background**

1.1. The preparation of a Strategic Housing Land Availability Assessment (SHLAA) is a requirement of the National Planning Policy Framework (NPPF) as revised in July 2018 (and updated on 19 February 2019). Guidance on preparing SHLAA documents is contained in both the NPPF and the National Planning Policy Guidance (NPPG) for housing and economic land availability assessments published in September 2018. This SHLAA Update accords with both the revised NPPF and the NPPG.

1.2. The SHLAA is an ongoing technical process to inform planning policy development and implementation. It assists in the monitoring of whether there is an adequate supply of deliverable housing land at any point in time.

1.3. The previous Leeds SHLAA worked to a base date of 1 April 2018. This SHLAA Update works to a base date of 1 April 2019. The NPPG provides information to help local authorities fulfil their responsibilities under paragraph 67 of the NPPF. As well as establishing a five-year supply position to support the preparation and examination of Local Plans, the NPPG confirms that the supply position should be updated annually.

1.4. Preparation of a SHLAA for Leeds commenced in 2008 with the setting up of a partnership of external housing interests, agreement of a methodology and assessment of over 700 sites. The exercise completed in 2009 and the final reports were published early 2010. The SHLAA has been updated annually to adjust the delivery prospects of sites against updated information and to consider new sites.

1.5. The SHLAA has been subject to examination at public inquiries at Thorp Arch Trading Estate, Wetherby (closed, November 2017) and subsequently updated at Tingley Station (up to 770 dwellings at land at Dunningley Lane) (closed, January 2018). Both inquiries considered the five year supply position as sourced from the 2017 Update. The Secretary of States conclusion notes the confidence in the Council's "...thorough and proactive approach to land availability".

1.6. The SHLAA site information was presented to support the allocation of sites in the Site Allocations Plan at Examination between 24 October 2017 and 3 August 2018. The Inspectors Report released on the 7 June 2019 noting that "It is considered that the assumed build-out rates contained in the SHLAA are realistic and robust".

2. **The SHLAA Partnership and stakeholder engagement**

2.1. National practice guidance advocates that local planning authorities work together with key stakeholders, in particular house builders and local property agents; so that they can help shape the approach to be taken to help inform the deliverability and developability of sites, and how market conditions may affect economic viability. In line with the guidance the Council has established a consultation procedures with the HBF, the SHLAA Partnership, landowners, agents and applicants of planning applications,
2.2. In previous years the Council has assembled a SHLAA Partnership to steer and oversee the technical work on individual sites. The partnership comprises officers, members, the HBF, housebuilders (including SMEs and volume builders, both delivering in a variety of markets throughout Leeds), interested parties and statutory agencies such as the Homes England.

2.3. As part a revised approach to the SHLAA process during the 2017 Update the Council contacted agents, landowners and promoters of sites to comment upon the availability and achievability of each site as part of a positive approach to update the SHLAA according to the most up-to-date information available on a site-by-site basis. The previous 2018 update followed this methodology and the 2019 also adopts this approach.

2.4. The Council has been in discussions with landowners and developers through the Private Sector Housing Acceleration Scheme as part of the 2017 update by establishing contact through letters sent in June 2015, July 2016, September 2016 and July 2019 following the purchase of title information from the Land Registry. The Council is now in on-going dialogue with developers to keep up-to-date construction programmes for sites with planning permission. This is the across the board approach taken in the 2019 SHLAA in order to obtain detailed site-specific information that informs assessments of deliverability as advocated by the Inspector and Secretary of State in recent decisions. This approach has again been taken in the 2019 Update following consultation with landowners, agents and developers in July 2019 and members of the HBF in September 2019.

2.5. Following the purchase of further land ownership information from the Land Registry in June 2019, the Council wrote again on 12 July 2019 to landowners, developers and agents of the sites in the current land supply, to confirm the availability of sites and produce an up-to-date and accurate picture of delivery. This informed the technical update of the information held for sites with views on viability and market activity forming part of the consultation.

2.6. The Council consulted the HBF in August 2019 asking that their members review and provide comments on sites where they are the landowner or developer of the site or the agent acting on their behalf. The Council has also contacted landowners and their agents to collate clear evidence order to make informed decisions as to how sites contribute to the future supply of housing in Leeds. The details of all construction programmes provided to the Council are accurately reflected in the final 2019 SHLAA.

3. Preparing the 2019 SHLAA

3.1. The preparation of the 2019 SHLAA reflects the most up to date guidance available, including the NPPG. In particular, the NPPG provides more detailed advice for carrying out a SHLAA, noting that it should:

- identify sites and broad locations with potential for development;
- assess their development potential; and
• assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

3.2. The approach taken in the 2019 SHLAA provides an up-to-date and accurate picture of deliverability. Site assessments have been updated to reflect recent planning and construction activity across the district in accordance with national policy.

3.3. The sites included in the supply satisfy the requirements of paragraph 67 of the NPPF, which states that local planning authorities may need to develop a range of assumptions and benchmarks to help to inform and test assessment and that assumptions should be based on clear evidence, consulted upon with stakeholders, including developers, and regularly reviewed and tested against actual performance on comparable sites. This guidance is especially relevant for a metropolitan authority the size and complexity of Leeds. This is the purpose of the SHLAA.

3.4. Annex 2 of the NPPF (updated 19 February 2019) defines a deliverable site in the terms of an assessment of the timescale for delivery and the planning status of the site. To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. As well as sites which are considered to be deliverable in principle, this definition also sets out the sites which would require further evidence to be considered deliverable. The Council adopts this approach in the SHLAA. This has been done by reference to the Site Allocations Plan process and SHLAA consultation responses, alongside the latest development details of sites. Sites which previously had planning permission for housing may have now been developed or proposed for other land uses. Such sites are removed from the SHLAA by making them dormant.

3.5. The NPPF advises that sites that are not major development, and all sites with planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Where a site has outline planning permission for major development, has been allocated in a the development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

3.6. Where sites have an expired planning permission or no planning history, the SHLAA process has confirmed that sites remain undeveloped and available and the Council has written to landowners to confirm availability, timeframe for delivery and determined there are no identified impediments to the site being delivered. Many of these sites form the Council’s Private Sector Housing Acceleration Scheme and officers are in dialogue with landowners and developers to bring forward developments in the short term. Sites that have a planning application pending are discussed with case offices and updated accordingly and the Council is also aware of pre-application enquiries where a view to an application being submitted to the Council for the delivery of housing is being sought.
3.7. The Council agrees lead-in times and build out rates through the SHLAA Partnership where it is possible for sites currently without planning permission to obtain outline and/or detailed consent and see the start of completions from 24 months onwards. This is based on actual completion rates on sites in different locations and across all markets of the district. Sites without planning permission where the Council has contacted a willing landowner to confirm pre-application activity which may see sites contribute to the deliverable supply from Years 3, 4 & 5 in accordance with NPPF paragraphs 30 and 48. Sites currently under construction and with detailed planning permission contribute to delivery in Years 1 & 2.

3.8. Where sites are in current or former alternative use, the Council has taken an informed approach and considered delivery likely to be achieved. The Council has contacted landowners to confirm availability and determine details of any existing tenancy agreements in order to assess deliverability upon the landowner obtaining vacant possession of the site together with lead-in times for planning application(s), commencement on sites and the delivery of completions. The short term supply (Years 1 to 5) does not include sites in alternative use with no planning permission as they are not assessed as “available now” for the purposes of the NPPF definition of deliverable and NPPG paragraph 20. Further, sites with expired planning permissions are set outside the short-term picture unless there is evidence of active planning application activity to bring the site forward.

3.9. The revised NPPF and guidance is consistent with the previous version and adds further detail as to the evidential requirement needed on sites without a detailed planning permission. The Council has produced clear evidence across all sites as part of the SHLAA process, thereby satisfying the NPPF approach just as it had satisfied the previous version. It has always been important to confirm an accurate position of housing land supply by identifying any factors leading to either delay or acceleration of house building on sites. This includes confirmation of any availability or ownership issues that would impact on the delivery of a site.

4. The Leeds Development Framework

The Core Strategy

4.1. The Council Adopted its Core Strategy in November 2014 and this set the framework for housing growth in the District alongside a spatial strategy for development, which sets out where sites will come forward and when. Core Strategy Policy SP6 sets out that the housing requirement will be 70,000 (net) new dwellings between 2012 and 2028.

4.2. Executive Board resolved to undertake a selective review of the Core Strategy in February 2017. It agreed a targeted scope focussing on: updating the housing requirement for a revised plan period of 2017 and 2033.

The Core Strategy Selective Review

4.3. The Core Strategy (CS) was amended on 11th September 2019 by the adoption of the CSSR and the City has a new housing requirement of 51,952 (net) between 2017 and
2033. This is the amount of housing Leeds needs to build. The Core Strategy Selective Review was adopted at Full Council on 11th September 2019.

4.4. The adopted annual housing target from 2017 is 3,247 dwellings per annum. The current plan period ends in 2033.

The Site Allocations Plan and Aire Valley Leeds Area Action Plan

4.5. The Council adopted the Site Allocations Plan (SAP) on 10 July 2019. The Aire Valley Leeds Area Action (AVLAAP) Plan was adopted in November 2017. Together these Plans set out where allocations for housing will be up to 2028.

4.6. The Plans bring together the comprehensive release of a range of sites, across 11 Housing Market Areas (HMCAs). In the City Centre, the Private Rented Sector (PRS) is an emerging sector in the home building industry in Leeds with potential for over 10,000 new homes over the next 10 years. SME and regional-scale developers will have opportunities for increasing activity across the District including on challenging brownfield sites proving possible to deliver viable and attractive schemes.

4.7. The AVLAAP (2017) includes allocations to deliver a minimum of 6,500 between 2012 and 2028 within the area focussed across five broad locations (South Bank/ East Bank/Cross Green/Hunslet Riverside/Skelton Gate), each strategically important in delivering the area's housing requirement and to supporting wider regeneration aspirations.

4.8. The SHLAA does not allocate land, but it has been the key source of sites for the SAP and AVLAAP.

5. Planning, Housing and Regeneration Programmes

5.1 The Council has a range of strategies and programmes in place to unlock land and support the delivery of new homes. The Council also identified in November 2018 its own aspirations to deliver a new programme of council house building following reforms to the funding arrangements for schemes announced by the Government at the end of October 2018. The Council has agreed to seek to build around 300 new homes per year as a result of that and is actively seeking opportunities to acquire sites for development across the city. This recognises that the private sector is unlikely to be able to deliver the quantum of homes to meet the city’s needs in isolation, and the important role that the Council and other public sector bodies will have in directly developing new homes. It also acknowledges that some sites may require targeted support if their potential for development is to be fully realised.

5.2 The last year has shown the greatest level of planning and construction activity in over a decade. In April 2019, the number of sites under construction increased to 133, which is the highest level of sites operating at the same time since 2007/08. Analysis of sites completed at 1 April 2019 that had been under construction for a period more than 60 days reveals that average build out rates have increased to 64 units per annum
from 45 in the previous year. This ranges from 19 units for sites under 20 units to 99 units on sites over 100 units, which can accommodate multiple outlets. The increase in build out is reflective of improved activity across all markets in Leeds including larger sites and the continued resurgence of the city centre translating on the ground from planning approvals to completed homes.

<table>
<thead>
<tr>
<th>Site Capacity</th>
<th>Number of sites</th>
<th>Total units complete (as at 31 March)</th>
<th>Build out (per annum)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Under 20 units</td>
<td>131</td>
<td>1,262</td>
<td>19.0</td>
</tr>
<tr>
<td>Between 20 to 50 units</td>
<td>39</td>
<td>1,223</td>
<td>52.9</td>
</tr>
<tr>
<td>Between 50 to 100 units</td>
<td>20</td>
<td>1,404</td>
<td>87.1</td>
</tr>
<tr>
<td>100 or more units</td>
<td>8</td>
<td>1,216</td>
<td>98.7</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>198</strong></td>
<td><strong>5,105</strong></td>
<td><strong>64.0</strong></td>
</tr>
</tbody>
</table>

5.3 At 1 April 2019, 24,896 units have planning permission with a further 11,022 units available to gain planning permission on allocated land including nearly 5,000 remaining on allocations in the Aire Valley. Of the 24,896 units with permission, 20,211 have detailed planning approval. Considering that 4,997 units are under construction, this leaves 15,214 units with detailed planning permission that have not yet started. There are 211 sites with planning permission yet to start for 16,332 units which obtained approval in the last 3 years and await commencement on site following the formulation of a construction programme. The rate of expired planning permissions is low as developers seek to commence construction upon the approval of planning permission.

5.4 There remains a small stock of just 17 housing allocations from the previous development plan that have capacity for 1,763 units that have not been brought forward as planning applications of which just 13 are on greenfield land. These include large sites that require infrastructure to be put in place prior to a scheme being brought forward such as the East of Otley site, which is a long-standing part of the city’s agreed planning strategy for the development of 550 new homes as well as a new primary school, employment uses and greenspace. Funding of £6.3m from the Housing Infrastructure Fund (HIF) will gap fund construction of a 1.5-kilometre East of Otley Relief Road that will, subject to planning permissions, allow housing development to start by providing an eastern bypass that will relieve traffic pressure on Otley town centre. These 17 previous development plan allocations have been carried forward and are part of the Site Allocations Plan; continuing to contribute against plan requirements.

5.5 The Council continues to press for increased build out rates and acknowledges the Government’s report as part of the Letwin Review to support proposals that diversify the market in order to accelerate construction to meet housebuilding targets. The Site Allocations Plan will release a volume of large sites (over 50 units) capable of build out rates at the higher end of the range. The trajectory of deliverable sites is based on build rates and pre-build lead-in times which are applied to the assessment of the
delivery timescales. In reality, sites will come forward and deliver in a way which is not possible to forecast with certainty, reflecting market conditions and the capacity of the development industry to deliver housing. The actual rate of delivery of housing will be determined by, amongst other things, the capacity of the market to deliver (for example, skilled labour, construction finance and the cost of building materials) and the demand for new homes in different locations across Leeds. The Council have undertaken the detailed process of looking at individual sites and seeking to determine suitability, availability, achievability, start dates and build out rates.

5.6 This work is led on by a number of teams within the Council, who work together with the common goal of boosting housing delivery. This involves those from Planning, Housing and Regeneration, and includes the multi-disciplinary Housing Growth Team, who have been specifically established to drive forward the delivery of new homes across tenures, and tackle specific issues associated with stalled or otherwise challenging sites.

6. The 2019 Update

**NPPG Stage I: Identification of sites**

6.1. The area selected for the Leeds SHLAA is the Leeds Metropolitan District boundary as identified in the adopted Core Strategy (2014). This is the local planning authority area and has been consistently used as the SHLAA boundary since 2009. There are no sites in the SHLAA which cross administrative boundaries; therefore the SHLAA has not been the subject of detailed Duty to Cooperate discussions. Duty to Cooperate discussions continue to take place in relation to the plan-making process and the CS Inspector accepted that the Duty to Cooperate had been fulfilled. As a matter of good practice, Council officers have participated in discussions and workshops with regional housing land supply practitioners to share advice on the approach to SHLAA methodology, up-to-date case law, recent appeal decisions and interpretation of national policy and guidance.

6.2. The City Council has worked with a range of stakeholders in producing its SHLAA over recent years including volume house builders, small and medium scale house builders, estate agents, landowners, representatives of the HBF, Homes England, the Leeds Property Forum, regional planning bodies and the Local Enterprise Partnership.

6.4. Given its unique nature as a large Metropolitan authority with an extensive Green Belt and several stand-alone settlements of varying sizes, the SHLAA is broad enough to cover the full range of types of site listed in the NPPG. There are sites under construction, sites with a range of planning permissions, allocated sites from the previous Unitary Development Plan Review, brownfield sites, surplus land, green field and Green Belt sites. The guidance states that plan makers will need to assess a range of different site sizes from small-scale sites to opportunities for large-scale developments such as village and town extensions and new settlements where appropriate.

6.5. The Council has actively sought sites for consideration through the SHLAA since 2009 and continues to receive them. In 2009 a formal “call for sites” exercise was
undertaken. At each subsequent SHLAA update further sites have been added. A site submission form and call for sites guidance note is available on the SHLAA page of the Council’s web-site. In reflecting national planning guidance, the web-site states “any person can make a suggestion for a new SHLAA site, not just landowners and their agents - a suggestion can be made at any time of year”.

6.6. Sites are also considered where they have been proposed via the plan-making process and where they are subject of the decision taking process from pre-application enquiries through to the grant of full planning permission. Since the 2009 SHLAA assessment the progression of the SAP which has identified new sites via submission to the plan-making process and flows of sites via the decision taking process have been the major source of new supply in Leeds.

6.7. More recently, sites have been submitted as part of the Council’s involvement as a lead authority in the pilot project of the Government’s Brownfield Land Register which was first published in December 2017 and is maintained annually as part of the SHLAA process.

NPPG Stage II: Site assessment

6.8. The NPPG requires that the estimation of the development potential of each identified site should be guided by the existing or emerging plan policy, including locally determined policies on density and mix. In Leeds this is concerned with whether sites accord with the policies of the Adopted Core Strategy and the SAP and AVLAAP.

6.9. The NPPG states that “assessing the suitability, availability and achievability of sites, including whether the site is economically viable provides the information on which the judgement can be made in the plan-making context as to whether a site can be considered deliverable over the plan period”. As noted earlier these tests can help make an assessment as to whether a site has a realistic prospect of coming forward within the short term (i.e. the next five years), the medium term (years 6 to 10) or the long term beyond this point.

6.10. The NPPG states that “plan makers should assess the suitability of the identified use or mix of uses of a particular site including consideration of the types of development that may meet the needs of the community. These may include, but are not limited to: market housing, private rented, affordable housing, people wishing to build their own homes, housing for older people, or for economic development uses”.

6.11. The suitability of SHLAA sites for development has been guided by:

- the adopted Core Strategy (particularly the spatial development strategy policies SP1 to SP10), Core Strategy Selective Review and the Site Allocations Plan
- national policy in the Framework (particularly the need to boost significantly the supply of housing and deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed
communities as well as the need to encourage the effective use of land by re-using land that has been previously developed (brownfield land)

- market and industry requirements as expressed to the Council via the preparation of the Core Strategy and recognition that the housing requirement of Leeds, which sits at the heart of the City-Region, is based on economic-led scenarios of likely growth.

6.12. The Council considers that a site is considered available for development, when, on the best evidence available there is confidence that there are no technical, legal or ownership constraints. The Council rely on the following sources of evidence for this:

- the call for sites – where submitters are specifically asked to identify such availability issues and have provided an intent to develop for housing
- information provided in association with planning applications or pre-application discussions – the SHLAA is continually updated with intelligence from Development Management officers who have detailed knowledge on specific sites
- information from regeneration officers working in specific parts of Leeds as part of area-based regeneration programmes
- information on Council-owned land from the Council’s asset management section
- information from the Site Allocations Plan consultation processes responses to consultation on each update (including from the landowners, agents, developers and members of the HBF)

6.13. The issue of achievability has been at the heart of the Leeds SHLAA. Paragraph 21 of the NPPG states: “A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period”.

6.14. The NPPG notes that this is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period. The resulting SHLAA analysis must also reflect the requirements of the Framework when considering sites in the short term (the next 5 years). The Framework states, “To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans”.

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6.15. An assessment of viability in Leeds has been tested through two Examinations - the Core Strategy and the CIL Charging Schedule. At both Examinations, the Inspector has determined that there is evidenced viability across all areas of Leeds. Housebuilder representatives on the SHLAA Partnership have confirmed this position. The Council is content there is no contradictory evidence to undermine these conclusions in respect of sites.

6.16. The NPPG and the Framework together seek that a realistic prospect of development at a particular point in time must be applied for all sites in the 5 year supply (short term). The Framework states that sites with planning permission should be considered deliverable unless there is clear evidence that they will not be implemented. The Framework at paragraph 67 provides more detail on the evidence sought between a short term site (i.e. the next 5 years) which must be considered deliverable and a medium term to longer term site (i.e. 6+ years) which must be considered developable.

6.17. The 2019 Update reflects this and sources information about potential deliverability issues on sites with planning permission from Development Management officers and local knowledge gained through the SHLAA partnership and consultation with HBF members.

6.18. The Council uses the information it has on suitability, availability, achievability and constraints to assess the timescale within which each site is capable of development. The methodology for the SHLAA is set out at Appendix 1 and makes the following general criteria about when development can start on suitable, available and achievable sites. This may include indicative lead-in times for the development of different scales of sites and where more up to date intelligence is available the general criteria are not used.

NPPF Stage III: Windfall assessment

6.19. The adopted Core Strategy sets a windfall allowance of 500 units per annum which was carried forward in the adopted Core Strategy Selective Review. This is a conservative allowance based on historic delivery of small sites below the SHLAA site size thresholds.

NPPF Stage IV: Assessment review

6.20. The SHLAA assessment group went through a detailed process of looking at individual sites and seeking to agree suitability, availability, achievability, start dates and build out rates based on actual planning and construction activity in the previous year. The broad methodology is included as Appendix 1 to this report.

6.21. The SHLAA has been aligned with the SAP and AVLAAP as follows:

   i. Changes to capacities as a result of more detailed assessment and requirements
ii. Amendments to site boundaries according with submissions to the SAP and AVLAAP and to align with sites which have been merged together in the SAP and AVLAAP\(^1\)

iii. Amendments to availability and achievability on the basis of site submissions

iv. Amendments to delivery for those sites not allocated for housing, to beyond the plan period, so that they remain in the SHLAA to be considered at a future review of the plan

v. Amendments to delivery for those sites proposed to be allocated as Safeguarded Land so that they sit in year 2033 onwards i.e. the year following the end of the plan period, should they be needed.

vi. New sites received through the SAP and AVLAAP consultation process.

6.22. New sites have been assessed from two key sources:

i. Sites which have received planning permission but were not in the previous 2018 SHLAA update, and

ii. Sites which have been submitted as part of the SAP and AVLAAP but were not in the previous 2018 SHLAA update.

**NPPF Stage V: Final evidence base**

6.23. The SHLAA also notes the potential type and quantity of development that could be delivered on each site, including an estimate of build out rates, setting out how any barriers to delivery could be overcome and when.

6.24. The Leeds SHLAA is published as a list of all sites considered, cross-referenced to their locations on maps, an assessment of each site, in terms of its suitability for development, availability and achievability including whether the site/broad location is viable, to determine whether a site is realistically expected to be developed and when.

6.25. The trajectory of deliverable supply is based on build rates and pre-build lead-in times which are applied to the assessment of the deliverability of sites. In reality, sites will come forward and deliver in a way which is not possible to forecast with certainty, reflecting market conditions and the capacity of the development industry to deliver housing. The Council have undertaken the detailed process of looking at individual sites and seeking to determine suitability, availability, achievability, start dates and build out rates. The methodology is included as Appendix 1 to this report.

6.26. The 2019 Update assesses 1,200 sites with a total capacity of 199,152 dwellings. Of these, 529 sites are considered to be suitable, available and achievable contributing a total of 49,722 units to the identified deliverable supply from SHLAA sites between 1 April 2019 and 31 March 2033. Table 1 and Figure 1 below shows a rolling trajectory of identified supply from available, suitable and achievable SHLAA sites (i.e. excludes windfall) that will be updated on an annual basis.

\(^{1}\) In some instances SHLAA sites have not been merged to accord with the SAP and AVLAAP e.g. where one parcel of land is advancing at a different rate to the other.
Table 1: 2019 SHLAA sites by type

<table>
<thead>
<tr>
<th>Type</th>
<th>Sites</th>
<th>19/20 to 23/24</th>
<th>24/25 to 32/33</th>
<th>Total</th>
</tr>
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<tbody>
<tr>
<td>Under construction</td>
<td>82</td>
<td>4,960</td>
<td>449</td>
<td>5,409</td>
</tr>
<tr>
<td>Planning permission (Detailed)</td>
<td>159</td>
<td>12,495</td>
<td>5,682</td>
<td>18,177</td>
</tr>
<tr>
<td>Planning permission (Outline)</td>
<td>27</td>
<td>2,115</td>
<td>1,499</td>
<td>3,614</td>
</tr>
<tr>
<td>Adopted Allocated Site (AVLAAP)</td>
<td>17</td>
<td>1,102</td>
<td>4,032</td>
<td>5,134</td>
</tr>
<tr>
<td>Adopted Allocated Site (SAP)</td>
<td>163</td>
<td>2,950</td>
<td>11,370</td>
<td>14,320</td>
</tr>
<tr>
<td>Previous planning permission (Expired)</td>
<td>79</td>
<td>0</td>
<td>3,068</td>
<td>3,068</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>529</td>
<td>23,622</td>
<td>26,100</td>
<td>49,722</td>
</tr>
</tbody>
</table>

Figure 1: Trajectory of deliverable supply by year

7. Conclusions

7.1. This 2019 SHLAA update takes the process forward and highlights the following key points:

- a boost in supply through record levels of planning approvals, housing growth initiatives and the adoption of the AVLAAP in November 2017 and SAP in July 2019.
- improving market conditions and greater confidence in investment decisions.
- an increase in the number of outlets under construction across all markets.
Appendix 1 - Methodology

Introduction

This report update sets out all the collated information and site conclusions reached for all active sites which form part of the Leeds SHLAA. The sites are mapped on an Ordnance Survey base at a scale to show the context of the location and the site boundaries. Each mapped site has the SHLAA reference number and Site Allocations Plan or Aire Valley Leeds Area Action Plan reference to enable cross reference to the site details of each site record. These are set out - site by site - in order of Housing Market Characteristic Area and then by SHLAA reference numbers.

Criteria for inclusion

This report includes all sites with dwelling delivery potential which are allocated for housing or mixed-use development in the Leeds Site Allocation Plan (SAP) and Aire Valley Leeds Area Action Plan (AVLAAP). Where more than one submission has been made on the same land, only one site record is included; duplications are not shown. Sites that have been built out are not included, even though they may have been in previous SHLAA's.

The size threshold for inclusion is 0.4ha except for sites that have planning permission which have a threshold of 0.2ha and sites in the city centre which have no size threshold.

Site Details

The SHLAA Ref No is unique to each record. They are not consecutive. The site address is a simple description of the location.

The Brown/Greenfield field simply records whether a site is previously developed or not; in line with the definition in the Glossary of the Core Strategy. For sites with a mix of "greenfield" and "brownfield", if one category covered more than 80% of the site, that category was assigned; sites that were more evenly split were assigned to “Mixed”.

Site Owner. Site ownership details are recorded from Land Registry title information purchased as part of the 2019 Update.

Planning

All planning applications and permissions are recorded. This means proposals for housing or other land uses within the last 10 years. The existence of applications/permissions for housing gives a signal that the site is suitable and available for housing. Sites with applications and permissions for non-housing uses are made dormant and removed from the deliverable supply.

LCC Dwellings

Capacity

This records the remaining capacity of the site in number of dwellings. The capacity is assessed in one of three ways with the first being preferential. First, if available, the latest planning application/permission is used to ascertain capacity. Second, submission
information as part of the SAP / AVLAAP process. Third, a standardised formula is used as set out in the table below Gross site size is converted to a net size depending upon the overall size of the site. This size is then multiplied by a density figure appropriate to the location of the site:

<table>
<thead>
<tr>
<th>Density Zone</th>
<th>Density Multiplier</th>
<th>Flat Proportion</th>
<th>Net to Gross Density Ratio by Site Size</th>
</tr>
</thead>
<tbody>
<tr>
<td>City Centre</td>
<td>350</td>
<td>100</td>
<td>100%</td>
</tr>
<tr>
<td>Edge of CC</td>
<td>65</td>
<td>60</td>
<td>N/A</td>
</tr>
<tr>
<td>Urban Area</td>
<td>40</td>
<td>20</td>
<td>90%</td>
</tr>
<tr>
<td>Edge of Urban Area</td>
<td>35</td>
<td>10</td>
<td>75%</td>
</tr>
<tr>
<td>Rural</td>
<td>30</td>
<td>0</td>
<td></td>
</tr>
</tbody>
</table>

The net site area may have been further reduced if one or more of the following development constraints were considered to apply to the site, for example:

- Steep slopes
- Heavy tree cover
- Awkward shape

Additional reductions to the net site area will have considered whether some or all of the constrained area may be used as amenity greenspace, green corridors etc and thus are already accounted for in the net to gross density calculation above.

**Start date**

Commencement dates are updated according to construction programme provided by landowners/developers as part of planning applications and/or discussions with the Council’s Housing Growth Team. The methodology for the SHLAA makes the following general assumptions about when development can start on suitable, available and achievable sites:

- With Full PP under construction = Yr 1
- With Full PP unoccupied = Yr 2
- With OT PP = Yr 2
- With OT PP occupied = Yr 3
- Without PP = Yr 3
- Expired site with no recent activity = Yr 6

**Build-out-rates**

Build out rates updated according to construction programme provided by landowners/developers as part of planning applications and/or discussions with the Council’s Housing Growth Team. With the exception of large sites and blocks of apartments, as a general rule a build-out rate of 35 dwellings per annum up to 50 units (where submitted and agreed with the developer) for each outlet is achievable depending on the size of site.
- Sites <200 units = 1 outlet (i.e. 35 dpa and up to 50 dpa)
- Sites 200 to 700 units = 2 outlets (i.e. up to 100 dpa)
- Sites 700 units plus = 3 outlets (i.e. up to 150 dpa) or more depending on knowledge from applicant or developer

**LCC Conclusions**

The text box sets out the key conclusions about suitability, availability and achievability of a site.

**Suitability**

A reflection of the sites assessment of planning status according to planning approval history and inclusion as part of the SAP / AVLAAP forward plan-making process.

**Availability and Achievability**

Availability concerns whether a site is free from legal or ownership problems which could prevent or delay development and how long it would take to overcome the problems.

Achievability concerns mainly whether and when there is likely to be a market for dwellings in the locality taking account of any cost factors to overcoming physical constraints or standard planning requirements. Achievability is an assessment on the likely delivery of dwellings.

Assessments on availability and achievability drew on the following factors, some of which will have been submitted:

- Construction progress
- Planning status
- Developer involvement
- Alternative proposals
- Site use
- Competing sites
- Site location
- Market area
- Landowner contact

Conclusions are set out as:

- Short term (1 to 5 years).
- Medium term (6 to 10 years).
- Long term (11+ years).