

Report of Director of City Development

Report to Executive Board

Date: 8 February 2017

Subject: Core Strategy Selective Review

Are specific electoral Wards affected? If relevant, name(s) of Ward(s): ALL	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Are there implications for equality and diversity and cohesion and integration?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Is the decision eligible for Call-In?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Does the report contain confidential or exempt information? If relevant, Access to Information Procedure Rule number: Appendix number:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Summary of main issues

1. Development Plan Panel (DPP) considered a report on 22nd November 2016 outlining a proposal to review selective policy areas of the Core Strategy, with the main purposes of updating the housing requirement in line with recent household projections and including national housing standards. DPP agreed the recommended approach subject to clarification of how the review timetable compares with the remaining timetable for the Site Allocations Plan.
2. The Leeds Core Strategy (CS) was adopted in November 2014 and forms the key strategic and spatial planning framework for Leeds. Central to this approach is the integration of a range of economic, environmental and social policy objectives. The Adoption of the Plan was a major achievement for a District the size and complexity of Leeds and a number of local authorities have still yet to adopt their own Core Strategies. The CS helps to advance key aspects of the Best Council Plan (BCP) 2015-20 and this proposed selective review will help further BCP priorities to provide enough homes of a high standard in all sectors and priorities related to health.
3. Consistent with a plan-led planning system, is the need to monitor the effectiveness of the Plan and the evidence base upon which it has been derived. Within this context there are a number of specific matters which have arisen post Adoption, which fall within the scope of a proposed selective review of the CS.

4. Within this overall context, the Plan has a key role to play in the delivery of homes to meet the various needs across the District. This includes the identification of objectively assessed needs (OAN) for housing and its distribution across the District via Housing Market Characteristic Areas (HMCAs). The Council has always recognised that levels of housing growth contained within the CS are at the upper levels of likely scenarios and relied on a particular set of optimistic growth conditions. It should be emphasised that at the CS examination, representatives of the housebuilding industry were pressing for much higher levels of housing growth (up to 90,000 over the plan period), whilst local residents groups were advocating much lower levels, in the order of 50,000.
5. The Core Strategy Inspector noted that the CS requirement was based primarily on the 2008-based population projections and did not reflect the lower 2012-based population projections, which were published at a very late stage of the Core Strategy Examination process. He accepted, as a proposed Modification, that as part of the implementation of the Core Strategy, the City Council monitor the evidence base and delivery of the CS requirement and through allocations plans, manage the release of sites through phasing. Government guidance states that national projections are the starting point for evidence on housing needs and these have been updated three times since the Core Strategy was prepared, each time showing lower levels of projected growth than those projected in 2008.
6. Following consideration at Council and elsewhere and in the light of this trend, Development Plan Panel agreed (May 2015) to “support a selective review of the CS within 3 years of its Adoption and following subsequent household projections, which will better reflect demographic trends of a recovering economy”. The latest projections are the 2014-based household projections and these form the starting point for further assessment via a Strategic Housing Market Assessment (SHMA).
7. Within this strategic context, there are a number of other policy areas, which also warrant consideration as part of a selective review. These include housing standards, discreet aspects of housing policy, employment and green space, where for ease of process, as the result of changes to the evidence base or as a consequence of specific issues arising from the application of policies, adjustments may be justified.

Recommendations

8. Executive Board is recommended to agree the initial scope of the core strategy review as follows:
 - i. Update the housing requirement in Policy SP6, considering and making any necessary consequent revisions to other parts of the Plan considering any implications for the spatial strategy;
 - ii. Extend the plan period to 2033;
 - iii. Update the wording for Policies EN1 and EN2, arising from the Government’s withdrawal of the Code for Sustainable Homes in March 2015, which is currently set out in the document “Implementation of Core Strategy Policies EN1 and EN2” on Leeds City Council’s website;

- iv. Update Affordable Housing Policy H5 in response to anticipated proposals in the forthcoming Housing White Paper and amend the policy as necessary in response to findings of the SHMA and viability assessment of policy;
- v. Amend Greenspace Policy G4 as necessary in response to findings of viability assessment of the policy;
- vi. Respond to policy implementation issues, which have arisen through Plan delivery;
- vii. Incorporate the Housing Standards policy work into the Core Strategy Review instead of undertaking it in a separate development plan document; and
- viii. Responsibility for ensuring implementation of these recommendations rests with the Head of Strategic Planning.

1 Purpose of this report

- 1.1 The purpose of this report is to seek approval of Executive Board to commence the formal steps for a selective review of the CS, to agree the suggested scope of the review and to commence the first regulatory stage of preparation. The matters which are considered to fall within the scope of the proposed review are areas where significant changes to the evidence base or specific issues arising from the application of policies have prompted further consideration, leading to the potential for revisions in a limited number of policy areas. It is not considered necessary, justified or appropriate for a wholesale review of the Plan to be undertaken.
- 1.2 This selective approach is consistent with the NPPF, which states in paragraph 153 that *“each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances”*.

2 Background information

Housing requirement

- 2.1 The Leeds Core Strategy (CS) housing requirement of 70,000 (net) new homes between 2012 and 2028 was based on the Strategic Housing Market Assessment (SHMA) 2011, which was completed within the context of national planning guidance. It should be noted that this guidance emphasises that population projections are the starting point for determining the housing requirement of a Plan.¹ The National Planning Policy Framework is clear that Local Plans should be kept up-to-date. According to the Planning Practice Guidance a ‘*meaningful change*’² in the housing situation should be considered in this context and whilst this does not automatically mean that housing assessments are rendered outdated every time new projections are issued, consideration should be given to a formal review of the CS to ensure the plan is up to date.
- 2.2 It is clear that a meaningful change in projections warrants consideration of a revised housing requirement for the CS now. The CS used the 2008-based government projections of household and population growth alongside a re-balancing of the Leeds mid-year estimate population, which had significantly varied from other indicators – for example GP Registrations, by circa 50,000 people at the end of 2010.
- 2.3 During and following the Examination in Public, the CS Inspector was made aware that subsequent base projections (2010-based and 2012-based) were lower for Leeds, but was of the view that housing growth needed to match economic aspirations, there was concealed need to be addressed and recessionary impacts on projections would be short lived.
- 2.4 Following release of the 2012-based projections, the third set of projections to subsequently show slower growth, Development Plan Panel (May 2015) agreed to, *“support a selective review of the CS within 3 years of its Adoption and following*

¹ Planning Practice Guidance, Ref: 2a-015-2014 03 06

² Planning Practice Guidance, Ref: 2a-016-2015 02 27

subsequent household projections, which will better reflect demographic trends of a recovering economy”.

- 2.5 At the July 2015 meeting of Scrutiny Board (City Development), Members agreed to undertake a joint Inquiry with Scrutiny Board (Environment and Housing) into ‘Housing Mix’ which covered the issue of housing numbers. The final report (March 2016) concluded:

¶13 Members of the working group also came to the conclusion that it was now important to draw a line under the numbers debate but noted the commitment to a selective review of housing numbers within three years of its adoption....

¶14 The 2012-based projections remain incomplete and have not fully captured information from the Census on household size. The 2014-based projections will be available in 2016. It is the view of the working group that it is essential to have the right population and household figures before any such review takes place.

- 2.6 The 2014-based projections were published in June 2016 and officers commissioned initial analysis contained as **Appendix 1** to this report discussed below.
- 2.7 Despite the efforts of the Council to increase the supply of land for the housebuilding industry (for example Executive Board released large stocks of UDP Phase 3 greenfield land in 2011 followed by a selective release of Protected Areas of Search in 2013) housebuilding in Leeds since 2012 has not met CS targets of 3,660 per annum. In part because of the lack of delivery the Council has been found to not have a five year housing land supply (appeal decisions in 2016 regarding land at Boston Spa, Kippax, East Ardsley, Bramhope and Collingham)..
- 2.8 The Council is facilitating housing delivery via a range of interventions and programmes. The main focus of this work is in the inner area, East Leeds and the City Centre; areas which has been slower to recover from recession and where the Adopted Core Strategy, Site Allocations Plan and Aire Valley Leeds Area Action Plan focusses the majority of housing development. Executive Board are also considering a Breakthrough Project report on “Housing Growth and High Standards in all Sectors”, which details the Council’s pro-active and cross tenure approach to stimulating housing growth. The Council established a cross Directorate housing growth team (working across planning, asset management, housing and regeneration) to stimulate delivery (e.g. the Private Sector Acceleration Programme has assisted in unblocking over 1200 homes since 2014, with a further 7,783 on the programme). Another report to this Executive Board details implementation measures to stimulate the delivery of a specific Private Rented Sector housing model in the City Centre where there is a potential supply of over 1,000 homes per annum. Moreover, the Council has been successful in attracting development interest for the delivery of new private housing in the Seacroft, Halton Moor and Osmondthorpe areas of the city by packaging its own land for sale to the market. A development agreement is now in place with Strata Homes and community regeneration specialist, Keepmoat which will secure the redevelopment of 13 sites delivering almost 1,000 new homes across these neighbourhoods. Executive Board also endorsed the Council House Building Programme (with an initial programme of 1,000 homes). These actions will all help to support housing growth in Leeds and

the Core Strategy Review will not change the need for the Council to continue to engage with a range of partners including house builders to help stimulate the market and boost the supply of housing.

- 2.9 It is important to note for the purposes of the Core Strategy Review that the delivery issues, including with land supply, viability, models of different house builders and wider economic factors, which the Council interventions, above, are seeking to address are not main factors in determining a revised housing requirement. Government guidance is clear that an Objectively Assessed Need (OAN) is a needs based assessment, which should not be affected by an ability to deliver. This is in contrast to former (now revoked) guidance under Planning Policy Statement 3: Housing which took into account past delivery rates.

3 Main issues

Proposed Scope of the Review

- 3.1 The first stage of the review will involve evidence gathering and public consultation on the scope of the review to comply with regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Based on the planning considerations set out below it is proposed that the Council undertake public consultation on the basis of this initial scope:
- i Updating the housing requirement in Policy SP6, considering and making any necessary consequent revisions to other parts of the Plan considering any implications for the spatial strategy
 - ii Extending the plan period to 2033
 - iii Updating the wording for Policies EN1 and EN2, arising from the Government's withdrawal of the Code for Sustainable Homes in March 2015, which is currently set out in the document "Implementation of Core Strategy Policies EN1 and EN2" on Leeds City Council's website
 - iv Update Affordable Housing Policy H5 in response to anticipated proposals in the forthcoming Housing White Paper and amend the policy as necessary in response to findings of the SHMA and viability assessment of policy
 - v Amend Greenspace Policy G4 as necessary in response to findings of viability assessment of policy
 - vi Responding to policy implementation issues, which have arisen through Plan delivery
- 3.2 It is also recommended that the Housing Standards policy work (previously endorsed by DPP at the meeting on 05/04/16) be incorporated into the Core Strategy Review rather than in a separate development plan document.

Planning Considerations

Reviewing the Housing Requirement

- 3.3 The CS currently has a requirement of at least 3,660 dwellings per annum until the end of 2016/17 and then the remainder of 70,000 dwellings spread over the remaining years of the plan period to the end of 2027/28. Against the overall target, this is 4,700 dwellings per annum. It is expected that evidence from a new Strategic Housing Market Assessment (SHMA), will generate a need to review the overall housing requirement and associated delivery issues. As part of this, consideration will need to be given to the plan period (this is currently 2012-2028 in the Adopted Plan). It should be noted that there is currently a backlog of 4,100 homes against the targets which began in 2012.
- 3.4 A revised plan period of 2017-2033 would enable the current monitoring year to run its course against a requirement of 3,660 per annum. Thus the 66,000 homes being planned for in the SAP may meet needs until 2033 (five years more than currently). This would be consistent with National Planning Policy expectation for plans to plan for housing delivery to a horizon of at least 15 years where possible (NPPF Paragraph 47). In other words, in the event of lower overall housing requirements, the Council's SAP will have a longer period to deliver the same level of housing; thus lowering annual targets but allowing for delivery issues to be addressed and monitored. These matters should not delay submission of the SAP but be a matter for the attention of the Planning Inspector during their examination of the SAP.
- 3.5 The new sub-national household projections released by Communities and Local Government (CLG) in June 2016 show a demographic "starting point" for Leeds of 2,600 homes required per annum between 2017 and 2033. The significant difference between this figure and the current Core Strategy requirement provides an evidential basis for a review of the housing requirement as part of a CS review. However, as Government Guidance makes clear the 2,600 figure is only the starting point. To explore and clarify this point further, the Council commissioned some initial analysis (by Edge Analytics) of the latest projections. Their assessment (the Edge Report) is contained at **Appendix 1**. They conclude, on the specific evidence considered, that housing requirements could be within a range of 3,100 to 4,000 homes per annum.
- 3.6 It should be emphasised that the Edge Report is a partial and preliminary assessment, to clarify the direction of travel of the latest household projections, when aligned with the latest economic projections. More technical work needs to be undertaken therefore to align with national guidance e.g. on affordable housing, cross-boundary effects, addressing backlog and an assessment of whether supply has constrained growth. This can be addressed via a new SHMA; the formal tendering process for this commenced on 10th January 2017.
- 3.7 A SHMA will factor in a number of issues including:
- the effects of economic growth (incorporating the Regional Econometric Model forecasts) including analysis of workforce and age of retirement etc.,
 - local demographic trends

- migration/commuting flows with other areas
- implications of Brexit on migration
- backlog of housing need
- current unmet need for affordable housing
- the number of newly arising households likely to be in affordable housing
- the relationship between the current housing stock and current and future needs
- concealed needs
- student housing needs
- the specific needs of older people for different types of housing.

3.8 In helping to provide certainty for investors, communities and infrastructure providers, in May 2015 Development Plan Panel recognised the importance of maintaining progress on the Site Allocations Plan (SAP) and endorsed the maintenance of the CS housing requirement as a basis for the Leeds SAP and Aire Valley Leeds Area Action Plan. This is necessary for the Plans to progress through Examination in advance of the Core Strategy Review (consistent with the Government's ambition to have full development plan coverage by 2017), help provide the flexibility required by Government guidance for plans to be sound and to ensure that through the development plan process, housing land supply is maintained.

3.9 Against this context it is important to emphasise that any change to the CS housing requirement does not automatically amend the progression of the SAP and its allocation of sites to deliver 66,000 homes. If the CS Review reveals a need for more homes this can be addressed via the assessments on sites already undertaken as part of the SAP process.

Implications for other Policy areas

3.10 When prepared the current Adopted Core Strategy had sufficient flexibility within its spatial strategy and policies to provide a framework for a range of housing requirement numbers i.e. a change to the requirement now will not render the spatial strategy out of date.

3.11 That said, if the plan period is extended to 2033 there will be a need to consider the consequences for all related policy areas of the CS. Most policies are criteria based and will apply equally regardless of the plan period. Some offer spatial priorities, such as SP1 "Location of Development", SP7 "Distribution of Housing Land and Allocations" and EC1 "General Employment Land". It is thought likely that these spatial preferences will remain unaltered if the plan period is extended. Policy SP11 provides a list of transport investment priorities which are unlikely to change for an extended plan period but could potentially be rolled forward to capture new and emerging commitments.

3.12 There are some policies which plan for quantities of development within the plan period. Policy SP6 deals with the housing requirement, SP9 and EC2 set out quantities of general employment and office space, H7 sets the quantity of accommodation required for Gypsy and Travellers and Travelling Showpeople and EN6 sets out quantities of waste to be planned for. The CS also sets out future

retail quantum, but these are predicated on need being justified through further retail studies and reviews pending completion of key city centre schemes. These matters would have to be considered in consultation on the scope of the Review but in practice any amendment to such policies is largely about rolling existing approaches forward rather than a fundamental shift in their scope.

Implications for the Site Allocations Plans

- 3.13 At the time of writing the Aire Valley Leeds Area Action Plan is to be subject to independent Examination between 24th and 26th January 2017. The quantities of development and related policies will not be affected by the proposed scope of the Core Strategy Review; impacts concerning estimates of delivery at the end of the current plan period may be addressed through minor modifications to the AAP.
- 3.14 The Site Allocations Plan (being considered elsewhere on this Agenda) is scheduled to be submitted to the Secretary of State in Spring 2017. If the CS selective review concludes that a lower annual housing requirement is appropriate, as noted above this would not necessarily mean that the Site Allocations Plan will be 'over-supplying' housing land, but rather will be planning for delivery over a longer period. When account is taken of the need to extend the plan period, only minor adjustments to the timing of delivery may be necessary, including safeguarded land. At this stage, it is not known if new evidence based studies would conclude that additional needs will have to be planned for, e.g. general employment land and Gypsy and Traveller Accommodation needs.

Housing Standards

- 3.15 Development Plan Panel and Executive Board considered reports in April 2016 recommending that the Council commence preparation of a Development Plan Document (DPD) to introduce the national housing standards in Leeds. Executive Board agreed that the DPD should seek to introduce the, "nationally described space standards" setting minimum sizes for new dwellings, and access standards setting minimum percentages of accessible dwellings on new developments. The standards have to be shown to be based upon need and tested for their effects on viability of housing development and impact on housing supply. Assuming this can be satisfied, the standards will ensure that new housing developments comprise dwellings of minimum internal space standards and a minimum proportion of dwellings designed to accessibility standards.
- 3.16 A swift timetable of preparation was agreed with early consultation and evidence gathering during spring 2016, drafting the Plan for Publication during summer 2016, formal consultation (6 weeks) and assessment of comments during autumn 2016, submission to the Secretary of State in winter 2016/17, examination in public in spring 2017 and adoption in summer 2017. Good initial progress has been made preparing the Housing Standards Plan (and a summary is set out in **Appendix 2** for information). However, given the fact that the CS is being reviewed, it is considered appropriate to subsume this work into the review, where it would complement the current suite of policies, rather than promoting a separate and 'freestanding' DPD that could be seen as an unnecessary fragmentation of the Council's Local Plan policies. The implication of this would be that the timetable for

the housing standards would be delayed as the Core Strategy review will inevitably take up to 12 months longer.

- 3.17 The Government's guidance on Housing Standards also enabled local authorities with policy on energy efficiency of new buildings to "passport" national policy into their plans. It would make sense for the CS Review to incorporate the 'passported' policy wording, which is currently set out in the document "Implementation of Core Strategy Policies EN1 and EN2" on Leeds City Council's website.

Affordable Housing

- 3.18 The review offers an opportunity to update and enhance the Council's policy position on delivering affordable housing. This will be in response to updated viability and need assessments and experience in applying the current approach. It can also consider the emergence of new models for having delivery such as PRS/"build to rent" and Starter Homes.
- 3.19 Similar to green space, any new affordable housing policy requirements will need to be factored into the viability assessment of policy. Affordable Housing policy will be reviewed to incorporate any changes generated by an up-to-date assessment of need, subject to viability testing.
- 3.20 Final guidance and new arrangements are awaited from the Government in its forthcoming Housing White Paper, but it is still possible that Starter Homes will be made a priority in new housing developments and this may generate a need to update the existing Core Strategy affordable housing policy H5.
- 3.21 The Council is in the process of lobbying the Department for Communities and Local Government for the flexibility to develop locally-led solutions to housing needs, through a proactive approach in delivering and enabling growth, particularly in relation to the delivery of affordable housing. In relation to Starter Homes, CLG is being asked that the maximum value is more closely aligned to affordability in Leeds and to provide certainty that Starter Homes are to be regarded as part of the overall affordable housing provision for a site and so can be legitimately counted against local affordable need requirements. It is suggested that formal definitions should be updated through the NPPF and NPPG and there needs to be consistency from government about size thresholds for sites between starter homes and other affordable provision.

Green space

- 3.22 As a consequence of exploring viability of housing standards the requirements of Green Space Policies G4 and G5 need to be considered. For residential development, green space policy in the Core Strategy seeks provision of 80sqm of green space per new dwelling. Whilst this approach was endorsed by the Core Strategy Inspector, and factored in historical achievement of green space, which often involved commuted sums for off-site provision, this now needs to be reviewed with further viability testing. The use of planning obligation contributions is now limited by the operation of the Community Infrastructure Levy (CIL) Regulations which restricts the pooling of such contributions and intends for CIL to be the primary source of infrastructure funding in the planning regime.

- 3.23 Clearly within this context a balance needs to be struck in delivering a sufficient quantum of green space, whilst achieving other key policy objectives including housing delivery. Consequently, as green space policy has ramifications for both housing site capacities and for residential development viability, it makes sense for green space policies G4 and G5 to form part of the CS selective review. In relation to Policies G4 and G5, Green space will be reviewed to set requirements that will be viable for most developments, and clarify where off-site contributions may be sought in the context of the Community Infrastructure Levy Regulations.

Other Areas

- 3.24 The selective review offers opportunity to make minor changes to address operational issues which have arisen following the adoption of the CS. In order to expedite the CS review process, it is important that only key areas are targeted, where deliver issues have emerged. One correction would be the revision of Map 5b to accord with Regeneration Areas Map 5.

4 Next Steps

- 4.1 The first stage of preparation of the CS review involves assembling evidence to support the proposed changes and consulting interested parties about the scope of the review. The Council also needs to prepare a Sustainability Appraisal Scoping Report and Equality Impact Assessment and comply with the Duty to Cooperate.

Evidence Gathering

- 4.2 Because work had already started on the Housing Standards DPD, evidence has already been assembled concerning need, viability and impact on land supply. This is summarised in **Appendix 2**.
- 4.3 A new Strategic Housing Market Assessment (SHMA) will be required to assess housing needs drawing upon household and population projections from CLG and the Office of National Statistics and taking account of economic growth projections, migration and demographic change. It will also need to review the geographical extent of the Leeds housing market area, taking account of Leeds City Region research and duty to cooperate discussions with neighbouring local authorities.
- 4.4 The SHMA will also need to refresh the need for affordable housing following the nationally prescribed methodology in National Planning Practice Guidance. The preparation of the SHMA will be overseen with input from a range of Council Services and will provide opportunity to examine what types and mixes of new housing is needed in the different Housing Market Characteristic Areas of Leeds. The SHMA may also have to deal with implications of the Government's forthcoming Housing White Paper if it is published before the SHMA is completed.

Initial Consultation

- 4.5 Under Regulation 18 of the Town & Country Planning (Local Plans) Regulations 2012, it is necessary to consult with individuals and organisations that may have an interest in the Plan to comment on the content and scope. It is proposed that consultation on the Council's intention to undertake a selective review of the Core

Strategy be undertaken consistent with the regulations and the Council's Statement of Community Involvement including notification of individuals and organisations that commented on the CS and provision of a 6 week period to comment on a scoping paper, based on the proposals set out in this report. The Regulation 18 consultation undertaken during summer 2016 on Housing Standards will not need to be repeated, and feedback received can be incorporated into the Consultation Statement for the CS Review, along with any further comments received.

- 4.6 The review should also be the subject of Strategic Environmental Assessment and it will be necessary to prepare a Sustainability Appraisal baseline report for comment by the Environment Agency, Historic England and Natural England. An Equality Impact Assessment will also be necessary and work to meet the Duty to Cooperate will have to commence. This work has already been carried out for the Housing Standards element of the Plan review, but will be necessary for the other elements of the review.

Proposed Programme

- 4.7 Revising a plan requires the same procedural stages of preparation as preparing an entirely new plan, including public examination. As recommended by Development Plan Panel, the following programme sets out the key milestones alongside those for the Site Allocation Plan:

Core Strategy Review	Start	Finish	Site Allocations Plan	Start	Finish
Exec Board Approval		Feb-17	Approval of submission by Exec Board		Feb-17
Reg 18 formal consultation period	Feb-17	Apr-17	Approval of submission by Full Council		Mar-17
Considering public responses to Reg 18	Apr-17	May17	Advertising of pre-submission changes	Feb-17	Apr-17
Drafting the Plan for Publication	Jun-17	Jul-17	Submission		Apr-17
Development Plan Panel Approval		Nov-17	Examination		Sep-17
Exec Board Approval		Dec-17	Adoption		Dec-17
Formal consultation (6 weeks)	Dec-17	Jan-18			
Consideration of responses	Jan-18	Mar-18			
Submission	Summer 2018				
Examination	Autumn 2018				
Adoption	Winter 2018				

5 Corporate Considerations

5.1 Consultation and Engagement

- 5.1.1 A DPD has statutory requirements for public consultation at key stages which will involve key consultees. Technical work underpinning the CS Review will be carried out with the full engagement and involvement of other Directorates e.g. it is intended that the SHMA be prepared as a joint City Development / Environment and Housing commission and that the Joint Strategic Needs Assessment be fully reflected in any change to housing policy.

5.2 Equality and Diversity / Cohesion and Integration

- 5.2.1 The review of the Core Strategy will require Equality Impact Assessments at appropriate stages. An EIA screening (attached as an appendix) has been undertaken and due regard has been given.

5.3 Council policies and Best Council Plan

- 5.3.1 The Core Strategy is one of Leeds City Council's main policy documents setting out vision, objectives, policy and targets for the future growth of Leeds particularly in terms of spatial planning. The Core Strategy helps articulate the spatial dimension of other council strategies and plans including 'Vision for Leeds' and the Best Council Plan, so it is important that the Core Strategy is kept up-to-date.

5.4 Resources and value for money

- 5.4.2 The Core Strategy Review will require both staffing and technical resources to support the plan making process and evidence base work. However it is desirable that the Core Strategy should be up-to-date in terms of Leeds' need for housing growth and effective in terms of delivering quality of housing and new development within Leeds.

5.5 Legal Implications, Access to Information and Call In

- 5.5.1 The Core Strategy Review will follow the statutory Development Plan process. The report is eligible for call-in.

5.6 Risk Management

- 5.6.1 One risk is the dependency on DCLG policy changes to national Starter Homes policy. If DCLG continues to delay publication of policy guidance this will create uncertainty in knowing how to redraft Leeds' affordable housing policy, and may require later revisions.
- 5.6.2 If the Core Strategy Review takes longer to prepare than expected it is likely that the Council will be vulnerable to challenges concerning the relevant policy areas. Homes will continue to be permitted below the size and access standards expected to meet Leeds' aspirations for quality. The risks to delay in the production of the Core Strategy Review lie with staff resource limitations and the involvement of other parties. There is a danger of protracted negotiations with the development industry and other interests about what is reasonable in terms of viability.

6 Conclusions

- 6.1 As highlighted in this report, the Adoption of the Core Strategy was a major achievement for Leeds, in providing an overall spatial planning framework for the District. An integral aspect of a plan-led system is the need to monitor the effectiveness of the Plan and the evidence based from which it has been derived. Within this operating context, a selective Core Strategy Review is considered necessary in relation to a number of specific areas. Central to this is the overall CS housing requirement but there are also other specific policy areas outlined in this report which should also be included in the scope of the review.

7 Recommendations

- 7.1 Executive Board is recommended to agree the initial scope of the core strategy review as follows:
- i. Update the housing requirement in Policy SP6, considering and making any necessary consequent revisions to other parts of the Plan considering any implications for the spatial strategy;
 - ii. Extend the plan period to 2033;
 - iii. Update the wording for Policies EN1 and EN2, arising from the Government's withdrawal of the Code for Sustainable Homes in March 2015, which is currently set out in the document "Implementation of Core Strategy Policies EN1 and EN2" on Leeds City Council's website;
 - iv. Update Affordable Housing Policy H5 in response to anticipated proposals in the forthcoming Housing White Paper and amend the policy as necessary in response to findings of the SHMA and viability assessment of policy;
 - v. Amend Greenspace Policy G4 as necessary in response to findings of viability assessment of the policy;
 - vi. Respond to policy implementation issues, which have arisen through Plan delivery;
 - vii. Incorporate the Housing Standards policy work into the Core Strategy Review instead of undertaking it in a separate development plan document; and
 - viii. Responsibility for ensuring implementation of these recommendations rests with the Head of Strategic Planning.

8 Background Documents³

- 8.1 None

³ The background documents listed in this section are available to download from the Council's website, unless they contain confidential or exempt information. The list of background documents does not include published works.