
Report of Director of City Development

Report to Development Plan Panel

Date: 3rd November 2017

Subject: Update on the Leeds Site Allocations Plan – Proposed Amendments to Examination Timetable and Scope of Further Technical Housing Work

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 type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Is the decision eligible for Call-In?	<input type="checkbox"/> Yes	<input checked="" 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. The Leeds Local Plan sets out a vision and a framework for the future development of the City. It is made up of a number of separate documents at different stages of preparation: a Core Strategy, Natural Resources and Waste Plan, Site Allocations Plan and Area Action Plan for the Aire Valley. These Local Plan documents are a critical tool in guiding decisions about individual development proposals because they (together with any Neighbourhood Plans that have been made) form the starting point for considering whether planning applications can be approved. It is important to put an up to date plan in place to positively guide development decisions, attract investment in the City, plan for the right infrastructure in the right places and provide residents with certainty about what is happening in their local communities. It is also vital that the Local Plan documents are right for Leeds; are prepared in line with the legal and guidance frameworks of Government, reflect up-to-date evidence and reflecting the views of individual local communities.
2. The Core Strategy (CS) was finalised in 2014 and assesses the City's needs and opportunities in relation to housing, employment, community facilities and infrastructure – as well as a basis for safeguarding the environment, adapting to climate change and securing good design. The CS set a housing requirement of 70,000 (net) homes between 2012 and 2028.

3. The Site Allocations Plan (SAP) is at examination and provides housing, employment and green space site allocations and site criteria that help deliver the Core Strategy policies. The SAP ensures that sufficient land is available in appropriate locations to meet targets set out in the CS and achieve the Council's ambitions for more housing and regeneration in accessible and sustainable locations, which maximise the use of brownfield land where possible. Hearing sessions commenced in October 2017 with the Inspector examining matters on employment, retail, greenspace and Gypsies and Travellers.
4. The Aire Valley Area Action Plan (AVLAAP) was examined by an independent Government Inspector in February 2017 and Executive Board has recommended it be adopted by Council on 8 November 2017. This deals with allocations for housing and employment in a specific part of the City, stretching from the City Centre to the M1, including the Enterprise Zone.
5. Soon after the Adoption of the Core Strategy in November 2014, the Council agreed to review it within 3 years, because the evidence base on population growth was changing. The Council is progressing a Selective Review of the Core Strategy, including amending the housing requirement. This involves making use of the latest up-to-date official figures and the Governments revised approach to calculating housing needs. The Government's Housing White Paper, entitled - *'Fixing our broken housing market'*, was issued by the Department for Communities and Local Government (DCLG) in February 2017 and **included an indication from Government that local planning authorities should use a standardised and simplified approach to assessing housing requirements from early 2018**. The White Paper also reinforces the Government's existing strong protections for the Green Belt, and clarifies that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.
6. In order to ensure that the Site Allocations Plan was not significantly out of step with the most up-to-date housing needs the Council commissioned some initial evidence work on housing need in 2016 prior to submission of the SAP to the Secretary of State. This was considered by Development Plan Panel and Executive Board and showed that whilst lower, any revised housing requirement would not be significantly out of step with the housing sites being proposed for allocation in the SAP and that an extension to the plan-period would ensure that Green Belt land release when planned over the long term and in line with national guidance would remain justified.
7. As part of the Core Strategy Selective Review the Council commissioned further evidence in early 2017 as part of a Strategic Housing Market Assessment (SHMA). The SHMA calculated a locally based requirement and applied the Government's standardised methodology (as far as it was known at the time). This revealed a housing requirement in the region of 55,000 homes between 2017 and 2033. Similarly, the Council considered that an extension to the plan-period of 5 years would help ensure that any Green Belt land release proposed in the SAP on the basis of a higher housing requirement, would remain justified when considered against a lower requirement over a longer period of time.
8. Subsequent to all of the above work, further consultation on the approach to assessing housing needs was released by DCLG in September 2017. *"Planning for*

the right homes in the right places”, sets out the Government’s proposed standardised method to calculating housing need and applies it for each local authority in England and Wales. The approach is different from that in the Housing White Paper and sets a lower baseline for Leeds. The consultation figure is 2,649 homes per annum (equating to 42,000 for a 16 year plan period).

9. The Government consultation figure cannot carry much weight until the results of consultation are known and the approach is finalised. The consultation states that the figure is intended to be a minimum and does not reflect the need that some authorities may have to match housing growth with economic growth ambitions. Indeed, Government make clear the local authorities at advanced stages of plan making should carry on regardless of the new approach to housing need.
10. At the time of Submission of the SAP to the Secretary of State, the Council was of the view that planning for a lower Core Strategy Review housing requirement of would ensure that the release of Green Belt remained justified. However, the Government’s latest consultation raises concerns about the extent of the downward trajectory of housing need. This coupled with the need to consult with local people and local investors on the implications of a revised housing requirement through the Core Strategy Selective Review warrants careful consideration. In light of this, whether the sites proposed to be released from the green belt to meet the CS targets remain fully in accordance with the exceptional circumstances required to release land from the Green Belt.is now in doubt.
11. To that end, officers have been in contact with the Planning Inspectors of the SAP and the Department of Communities and Local Government to express concern about the implications of the latest Government consultation on the SAP. The options available to the Council are to (a) withdraw the Plan, (b) carry on notwithstanding the recent consultation (as advised by the Government consultation) or (c) seek to modify the Plan to ensure that it remains sound, whilst having regard to the downward trajectory of housing needs.
12. Withdrawal of the plan would mean that Leeds would have no plan in place for the delivery of housing; leading to an increase in speculative development proposals which the SAP is helping to defend against (there is one outstanding planning appeal at Bagley Lane, Farsley under consideration by the Secretary of State, two “live” planning appeals at Thorp Arch Trading Estate and Tingley Station refused on the basis of prematurity against the SAP and submissions on other greenfield sites for determination; all of which would be more difficult to defend in the absence of an advanced SAP). Carrying on regardless with the examination, whilst within the guidelines set by the Town and Country Planning Act and in line with the Government consultation, would place the Inspector in a very difficult position with regard to the exceptional circumstances required to justify green belt loss and may ultimately result in a Plan which the Council may find very difficult to Adopt without challenge.
13. The Chief Planning Officer in liaison with the Executive Member has recommended that the Examination process be continued to reflect the importance of having a plan for housing in Leeds, but that further technical work be done so as to ensure that the City is providing the necessary protections for its Green Belt. Maintaining progress helps meet clear needs for more housing, especially affordable homes, whilst maintaining progress of a Local Plan which creates certainty for investors and

prevents speculative development.

14. This report outlines the approach to be taken to the Examination of the Site Allocations Plan as follows: revised hearing schedules, the scope of further technical work on Green Belt release, a further statutory consultation, proposed modifications to the SAP including releasing less green belt for housing and a commitment to undertake a swift review of the SAP to take into account the forthcoming implications of the Selective Core Strategy Review.

Recommendations

15. Development Plan Panel is invited to:
 - i. Note and comment on the revised approach to the Examination of the Site Allocations Plan as set out in this report as representing a prudent and responsible way forward when considered against the alternatives of withdrawing the Plan or proceeding irrespective of the consultation from the Government on housing need, and
 - ii. Note that the outcomes of the further technical work and any other procedural arrangements will be presented at the Panel meeting on 21st November

1 Purpose of this report

- 1.1 This report sets out a revised approach to progressing the Leeds Site Allocations Plan through its Examination. This is to ensure that the Council responsibly reflects a recent Government consultation and new evidence therein, which suggests that the housing need in Leeds is to reduce when compared to that in the adopted Core Strategy and therefore despite being sound, the Site Allocations Plan may result in green belt being released for housing which is ultimately not required. .
- 1.2 This report sets out the initial scope of a revised approach to the SAP Examination for consideration. It updates Panel on discussions with the Department of Communities and Local Government and correspondence with the SAP Inspectors.

2 Background Information

- 2.1 The issues that are relevant to this report relate to a number of statutory local planning documents and national guidance:
- the Adopted Leeds Core Strategy, 2014
 - the Site Allocations Plan, which allocates land to meet the Adopted Core Strategy and which is currently at Examination by independent planning inspectors
 - the Selective Review of the Core Strategy, which is at drafting stage
 - the Government consultation “Planning for the right homes in the right places”

The Adopted Core Strategy

- 2.2 The Core Strategy (CS) was Adopted by the Council in 2014 and assesses the City’s needs and opportunities in relation to housing, employment, community facilities and infrastructure – as well as providing a basis for safeguarding the environment, adapting to climate change and securing good design. The CS was submitted to the Secretary of State in March 2013 with a housing requirement of 70,000 (net) between 2012 and 2028. At its meeting of 5th September 2017 Development Plan Panel Members considered information (Appendix 1 of 5th September Report) on the chronology of the Core Strategy preparation and the derivation of the Core Strategy requirement, which reflected the analysis of official statistics at a point in time.

Site Allocations Plan

- 2.3 The Site Allocations Plan (SAP) is in preparation and provides housing, employment and green space site allocations and site criteria that help deliver the Core Strategy policies. The SAP ensures that sufficient land is available in appropriate locations to meet targets set out in the CS and achieve the Council’s ambitions for more housing and regeneration in accessible and sustainable locations, which maximise the use of brownfield land where possible. The SAP is secondary to the Core Strategy and must have regard to the policies and requirements within it, including the housing requirements.

- 2.4 The SAP was submitted to the Secretary of State for independent examination in May 2017 with and hearing sessions commenced on 24 October 2017. It identifies allocations for 66,000 homes, which includes proposals to release land from the Green Belt to deliver 12,481 homes.

The selective Core Strategy Review

- 2.5 Soon after the Adoption of the Core Strategy the Executive Member for Planning and Regeneration made a commitment to review the plan within 3 years, at a Full Council meeting in January 2015, and confirmed that the Council would continually monitor the demographic evidence base. The chronology of the Review including further work commissioned on housing In May 2015 was set out in the 5th September 2017 report to Development Plan Panel (¶3.4 to ¶3.6 of 5th September Report Appendix 1).
- 2.6 The Selective Core Strategy Review is progressing, a report elsewhere on the agenda reports on the recent workshop with Members. The Publication Draft Policies of the Core Strategy Review will be presented to Panel on 21st November 2017. The current provisional timetable for the progression of the Core Strategy Review is set out below:
- Consultation on Publication Draft Policies – December 2017 to January 2018
 - Submission to the Secretary of State – Summer/Autumn 2018
 - Examination – Autumn/Winter 2018/19
 - Adoption – Spring 2019

Government Consultation on Housing Need

- 2.7 The Government's Housing White Paper (HWP), entitled - 'Fixing our broken housing market', together with background papers and technical information, was issued by the Department for Communities and Local Government (DCLG) on 7th February. The material is wide ranging in scope and sets out a series of reforms that the Government plans to introduce, to help change the housing market and increase the supply of new homes (1 million new homes by 2020). The overarching emphasis of the Paper is the "need to build many more houses of the type people want to live in, in the places they want to live" and in order to achieve this, the White Paper seeks to take a comprehensive approach that "tackles failure at every point in the system". The White Paper also reinforces the Government's existing strong protections for the Green Belt, and clarifies that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements
- 2.8 On 14th September 2017 the Department for Communities and Local Government published a consultation, "Planning the right homes in the right places", setting out a number of proposals to reform the planning system to increase the supply of new homes and increase local authority capacity to manage growth. This followed on from announcements in the Housing White Paper to amend the methodology for objectively assessed need. The consultation closes on 9 November and is timetabled to report in March 2018. It includes a "Housing need consultation data table", which sets out the housing need for each local planning authority using the

Government's proposed method, how many homes every place in the country is currently planning for, and, where available, how many homes they believe they need. For Leeds the consultation figure is 2,649 homes per annum (equating to 42,000 for a plan period). This is on the basis of a different methodology from that suggested in the Housing White Paper.

- 2.9 The consultation methodology uses Office of National Statistics population projections as a starting point and increases these based on the affordability of places – with the least affordable local authorities seeing the greatest increases above projected household growth. Basing the approach on household projections is not new but can create fluctuating results over time – at the current time Leeds' projections are low but, for example, at the time of the Core Strategy submission the projections pointed to circa. 90,000 new homes being needed (equating to 5,625 homes per annum).
- 2.10 The consultation notes that plan makers may put forward proposals that lead to a local housing need above that given by the proposed approach. This could be as a result of a strategic infrastructure project, or through increased employment (and hence housing) ambition as a result of a Local Economic Partnership investment strategy or through a bespoke housing deal with Government. Government state that they want to make sure that they give proper support to ambitious authorities who want to deliver more homes. The Core Strategy Selective Review evidence base is signalling that Leeds is an ambitious authority that needs to deliver more homes than the number identified in the consultation, but this evidence base is still subject to wider consultation before it is concluded.
- 2.11 The Government make clear in the proposals that they recognise that a number of plan makers have already made significant steps in preparing their plan, and that they want to encourage them to complete their plan, avoiding further delays and so undermining the delivery of new homes. Government advise that if the Plan is at examination stage it should progress using the current approach. This means that for Leeds the Government advice is to retain compliance with the Adopted Core Strategy until such a time as the Core Strategy is reviewed.

Performance

- 2.12 It should be noted that the Council has been aware that the Core Strategy requirements are challenging and high since the Examination of the CS and as each year since has progressed the Government Inspectors hopes that the national and local economy would swiftly recover from recession have not happened and the CS annual targets have not been met since 2012. The housing market has struggled through a series of wider economic crises not least the impacts of the uncertainties around the mortgage market review in 2015 and the Brexit referendum in 2016, which saw tangible decreases in quarter on quarter housebuilding activity in Leeds, despite there being 7 planning permissions in place for every new home built. The aspirational growth which was set in the CS in line with the NPPF, has proven impossible to deliver due to the wider difficulties of the housing market and the attitude of the house building industry. This situation is acknowledged in the Government's Housing White Paper and breaks with the previous approach of holding the planning system responsible for a lack of delivery.

- 2.13 The slow recovery from recession, felt especially in the northern cities (where very few have performed as expected in their own Local Plans) has in turn had an impact on the drivers of growth e.g. official population and household projections. Indeed each year since the Core Strategy was adopted has seen a lower and slower rate of household growth being forecast.

3 Main issues

- 3.1 The examination starts when the Local Plan is submitted to the Planning Inspectorate and concludes when a report to the local planning authority has been issued. The Plan was submitted in May 2017. When the Council submitted the SAP to the Secretary of State for independent Examination it was of the view that the Green Belt release for 12,481 homes was sound and appropriate. This was on the basis that: it was needed to ensure that opportunities for new homes existed throughout Leeds; there was not enough brownfield land to meet housing needs in all communities and where brownfield land was in good supply (e.g. in the City Centre and inner area) there was already a commitment to over-deliver the supply of homes. The Council is still of the view that the Plan is sound. However, it recognises a need to consider the changed circumstances brought about by the Government consultation on housing need.

Changed circumstances

- 3.2 The Inspectors remain of the view that the SAP must only be assessed against the Adopted Core Strategy housing requirement of 70,000. However, they asked the Council a series of questions¹ about the Core Strategy Selective Review and the implications of this on Green Belt release, the concern being that if the Core Strategy target was imminently to be reduced would there may be an unnecessary release of Green Belt in the SAP. The Council's response to these questions noted:

- it was not possible for the Council to conclude definitely on a future housing requirement,
- there was legal precedent for allowing the continuation of secondary plans without the need to revisit strategic plans,
- the implications of the Government methodology are unknown,
- any undermining effect on the Green Belt would be manageable through either the Core Strategy Selective Review not least because the extension of the plan period allow for the SAP allocations to be delivered over a longer period of time

- 3.3 However, the Government consultation on housing need now places the above position in a different context as it gives a further indication of a likely downward trajectory of housing need.

Options for the SAP Examination

- 3.4 In taking into account the implications of the DCLG consultation proposals the Council had three options available: to (a) withdraw the Plan, (b) carry on

¹ 28th August 2017, Further Questions to the Council

notwithstanding the recent consultation or (c) seek to modify the Plan to respond to the above change in circumstances.

- 3.5 Withdrawal of the Plan at this stage would result in no allocations being adopted, the majority of which are required to deliver even a reduced housing need identified in the recent consultation and which are brownfield sites and which are not existing greenbelt. There are 246 housing/mixed use sites of which 73 are proposed to be released from Green Belt. Withdrawal at this stage also places the large quantum of sites discounted for allocation at risk of speculative development and would further weaken the Council's five year housing land supply position leading to a situation where there would effectively be no plan for housing in Leeds. It would also result in extensive abortive costs and resources invested to date in the making of the Plan. The risks associated with withdrawal are therefor considered significant and for these reasons it is not considered an appropriate option for the Council to take.
- 3.6 To carry on with the Plan as submitted does not respond to the context set out in the Government consultation regarding the lower trajectory of housing needs. It is therefore not an option which the Council wishes to choose as it is of the view that it is both reasonable and prudent to have regard to this context.
- 3.7 Given the above it has been concluded by the Chief Planning Officer in consultation with the Executive Member for Regeneration, Transport and Planning that the most prudent and responsible option is to explore measures to continue the Examination of the Plan, with modification so as to ensure that it addresses the new wider context on housing needs.

Proposals to amend the SAP

- 3.8 To that end, officers have been in contact with the Planning Inspectors of the SAP and the Department of Communities and Local Government to express concern about the implications of the latest Government consultation on the SAP at such an advanced stage of the SAP process. The Executive Member has written to the Housing Minister expressing concern that the consultation significantly undermines the Council's attempts to comply with Government ambitions to get Plans in place quickly.
- 3.9 The Chief Planning Officer in liaison with the Executive Member has recommended that the Examination process be continued, but that further technical work be done so as to ensure that the City is providing the necessary protections for its Green Belt, whilst maintaining progress of a Local Plan which creates certainty and prevents speculative development. A letter and note² has been sent to the SAP Inspector to that end (**Appendix 1**). The Inspector has confirmed that she is content to proceed with the Examination on this basis.
- 3.10 The remainder of this report outlines the approach to be taken to the Examination of the Site Allocations Plan as follows: revised hearing schedules, the scope of further technical work on Green Belt release, a further round of public consultation, modifications to the SAP and a commitment, through a modification to the Plan, to

² 2nd October

take into account the forthcoming implications of the Selective Core Strategy Review.

Revised Hearing Schedule

- 3.11 The Inspector has agreed that the Examination can be split into two stages. Stage 1 has considered employment, green space, retail and matters related to Gypsies and Travellers. Stage 2, to be held next year, following an additional round of consultation, will consider housing and mixed-use sites along with matters relating to legal compliance and the relationship with the Core Strategy. The Scope of Further technical work on Broad Locations
- 3.12 Further technical will help to reflect the new and changed context for the Plan. It will propose to modify the Plan so that an amount of existing proposed housing allocations and safeguarded land will instead be identified at Broad Locations and remain in the Green Belt. Local Planning Authorities are encouraged to set specific identified sites for allocation or broad locations for the provision of housing needs. Broad Locations areas of land identified for a future housing allocation if needed. In Leeds a Broad Location would not be released from the Green Belt until a review of the Site Allocation Plan is undertaken, following Adoption of the Selective Core Strategy Review.
- 3.13 The National Planning Policy Framework (¶47) states that housing requirement can be met in local plans through the identification of specific sites or broad locations. The Planning Practice Guidance states that *“The Local Plan should make clear what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered. This can be done by setting out broad locations and specific allocations of land for different purposes; through designations showing areas where particular opportunities or considerations apply (such as protected habitats); and through criteria-based policies to be taken into account when considering development”*.³ National guidance is not prescriptive on the nature or extent of broad locations for housing, leaving such decisions for local planning authorities.
- 3.14 The Council’s original and sound intentions for the SAP were that all the land needed to be allocated would be identified on specific site allocations subject to phased release. This approach enables clarity and certainty for local people and investors and avoids having to undertake further green belt boundary reviews.. However, given the wider context of changing housing needs clearly signalled in the CLG consultation, it is now considered more appropriate to identify some Green Belt locations (those which would be required for housing in the later years of the plan period) as broad locations rather than specific site allocations. Broad locations will remain in the green belt until such a time as a future review of the SAP is undertaken. Any review of the SAP will be subject to and assessed against revised housing need targets adopted as part of the Core Strategy Selective Review. The Council has undertaken considerable consultation and a range of assessments, including Sustainability Appraisal and Green Belt assessment on specific sites in the SAP, which have been submitted on the basis that they form suitable sites for housing. Therefore in defining broad locations it is

³ Department for Communities and Local Government, Planning Practice Guidance, 2014, Section 12, ¶2

considered to be consistent with this approach and appropriate to retain the boundaries of the sites as broad locations. This also helps to ensure that the focus of the technical work for Stage 2 can be kept to a minimum and avoids uncertainty on the potential merits of sites near to broad locations which have previously been discounted. The Council is not proposing to reopen the site selection process as the technical work for Stage 2 relates only to the sites currently proposed as allocations in the submitted Plan. Further technical assessments of those allocations will be undertaken to determine which are the most appropriate to be identified as broad locations and remain in the green belt. The subsequent consultation will be restricted to matters relating to this and therefore any representations made in respect of new sites or extensions to boundaries of existing sites would be classed as not duly made.

- 3.15 The precise number and distribution of broad locations to be identified will be based on a number of different factors. These include:
- a) the analysis and assessment of Green Belt sites already part of the Site Allocations Plan submission, including phasing
 - b) the contribution that Green Belt land needs to make to the Site Allocations Plan housing trajectory; particularly over the short term (i.e, up to 2022/23) so as to be in accordance with the NPPF for a supply of specifically identified sites for a 5 year forward looking period
 - c) the need for the SAP to help support a five year housing land supply
 - d) the need for Green Belt releases to be equally and fairly shared amongst Housing Market Characteristic Areas so as to ensure that the homes that people need are in all areas of the City and to ensure the SAP continues to be in accordance with the CS
 - e) the need to identify, as broad locations both an element of housing allocations and safeguarded land, which the SAP currently proposes to remove from the Green Belt
- 3.16 Some land for housing will still need to be released from the Green Belt. Any remaining proposed Green Belt releases for either housing allocations, mixed-use allocations or safeguarded land would instead be proposed as broad locations. Such designations would remain in the Green Belt.
- 3.17 Once adopted, the SAP (including broad locations) would remain until such time as the Selective Core Strategy Review was agreed on the basis of the Government's final housing need methodology (and any subsequent amendments to the NPPF). The adopted Site Allocations Plan could at that time be subject of partial review to ascertain whether the site allocations within it contained sufficient sites to deliver the housing requirement to the end of the Core Strategy Review plan period of 2033. . If there were insufficient sites in the adopted SAP, the selective review of it could propose further site allocations from the pool of broad locations i.e. further Green Belt release in line with the revised housing requirement. However, if there were sufficient sites in the adopted SAP to deliver the quantum of housing identified in the Selective Core Strategy Review, the selective review of the SAP would either not be required or could remove the broad locations.
- 3.18 A modification to the SAP may also be proposed to include an express

commitment to progress the Core Strategy Selective Review and subsequently a review of the SAP, if required. National guidance expressly notes that there is an expectation that the Inspector should work proactively with the local planning authority and that “...consideration should be given to the option of the local planning authority making a commitment to review the plan or particular policies in the plan within an agreed period, where this would enable the Inspector to conclude that the plan is sound and meets the other legal requirements.”

4 Corporate Considerations

4.1 Consultation and Engagement

- 4.1.1 The focus of this report has been to update Members of the proposed changes for the Site Allocations Plan (SAP) to respond to the recent DCLG Consultation and potential downward trajectory of housing need. It is intended that following further technical work a series of main modifications to the plan are proposed and subsequently consulted upon in early 2018 (see timetable paragraph 3.11).

4.2. Equality and Diversity / Cohesion and Integration

- 4.2.1 In the preparation of the Site Allocations Plan, due regard has been given to Equality, Diversity, Cohesion and Integration issues. This has included the completion of EDCI Screening of the SAP and meeting the requirements of the Strategic Environmental Assessment Directive, which has meant that the Plan is subject to the preparation of a Sustainability Appraisal. The purpose of such Appraisal is to assess (and where appropriate strengthen) the document's policies, in relation to a series of social (and health), environmental and economic objectives. As part of this process, issues of Equality, Diversity, Cohesion and Integration, are embedded as part of the Appraisal's objectives. The SAP material follows on and reflects the approach set out in the Core Strategy, which has also had the same regard to these issues.

4.3 Council policies and Best Council Plan

- 4.3.1 The Core Strategy and SAP play a key strategic role in taking forward the spatial and land use elements of the Vision for Leeds and the aspiration to be the ‘the Best City in the UK’. Related to this overarching approach and in addressing a range of social, environmental and economic objectives, these Plans seek to implement key City Council priorities. These include the Best Council Plan (in particular priorities relating to ‘Supporting economic growth and access to economic opportunities’, ‘Providing enough homes of a high standard in all sectors’, ‘Promoting physical activity’ and ‘Enhancing the quality of our public realm and green spaces’ and Breakthrough Projects including ‘Housing growth and high standards in all sectors’ and ‘More jobs, better jobs’).

4.4. Resources and value for money

- 4.4.1 The proposals set out in this report incur further costs associated with a further round of public consultation. This is considered to represent better value for money than withdrawing the plan or progress it in its current form, both of which would place the investment made thus far at risk. Given the considerable costs

incurred to date progressing the Plan through Examination with modification is considered to be the best outcome in terms of resources and value for money.

4.5. Legal Implications, Access to Information and Call In

4.5.1 The report is not eligible for call-in as it is for information only.

4.6. Risk Management

4.6.1 Adoption of the SAP is essential to enable the Council to demonstrate that sufficient land will be available when needed to meet the need for housing in Leeds. Without an up to date plan the 'presumption in favour of sustainable development' by the Government means that any Local Plan or Neighbourhood Plan will have less weight and that speculative development may be acceptable, regardless of any previous positions of the authority. The further the Plan progresses, the more material weight can be given to it. The proposals outlined in this report ensure that, whilst the Plan will now incur limited delay, when set against the alternatives there are far fewer risks.

5 Conclusions

5.1 This report has provided an update of the current position with regard to the Site Allocations Plan. The Examination process, achieved after considerable consultation and technical work, can progress positively notwithstanding a recent Government consultation on housing needs. Further reports to Development Plan Panel will be presented in due course, detailing the application of a methodology outlined in ¶3.13 to ¶3.19 above. This is intended to establish a responsible approach to managing the release of Green Belt land for housing within the timetable for the Examination as set by the Inspector.

6 Recommendations

6.1 Development Plan Panel is invited to:

- i. Note and comment on the revised approach to the Examination of the Site Allocations Plan as set out in this report as representing a prudent and responsible way forward when considered against the alternatives of withdrawing the Plan or proceeding irrespective of the consultation from the Government on housing need, and
- ii. Note that the outcomes of the further technical work and any other procedural arrangements will be presented at the Panel meeting on 21st November