

# LEEDS LOCAL PLAN 2040

## SCOPING CONSULTATION DOCUMENT



## What is a Local Plan?

The Local Plan sets out what is expected from new development. It identifies the amount and type of development that is needed (including new homes and workspaces), where it should take place, and the services and infrastructure that is needed to support this. It sets standards that new developments are required to meet to ensure that they are of a high quality. It also includes policies which are used to protect valued community, historical or natural assets.

The Local Plan for Leeds is currently made up of 5 documents, which each contain a number of planning policies. A series of 'Supplementary Planning Documents' sit alongside the Local Plan and provide further guidance in relation to some of the policies in the Plan.



## Why are we updating the Local Plan?

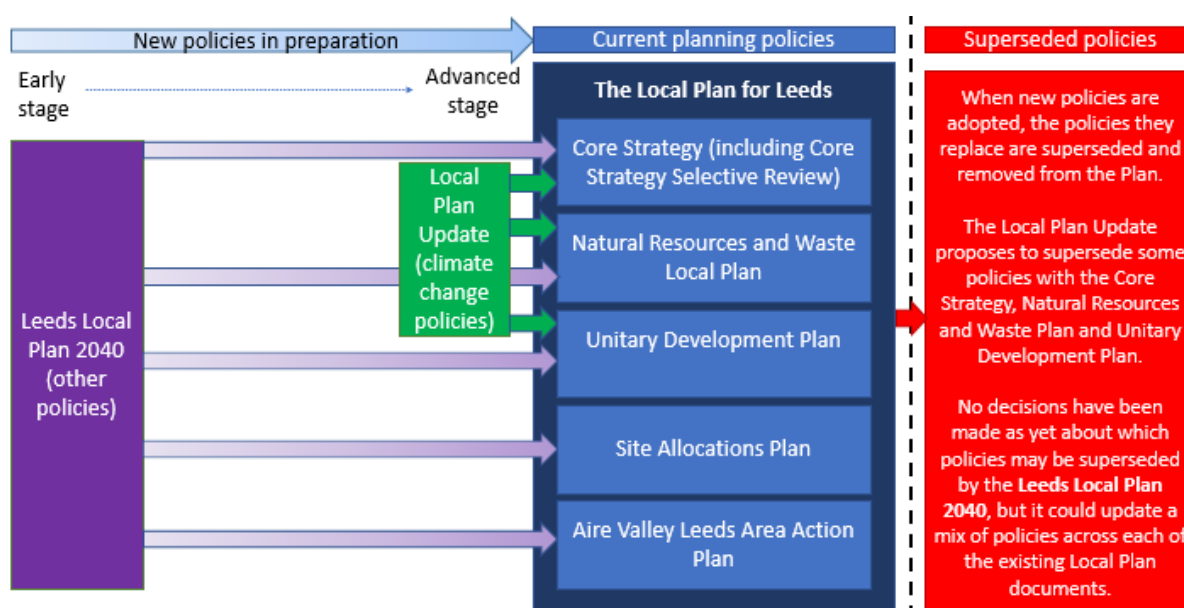
It is important that the Local Plan is kept up-to-date to ensure that its planning policies reflect the needs of communities and businesses in Leeds, address emerging challenges and help us make the most of new opportunities. The Government also requires Local Plans to be kept up-to-date and consistent with national policy, and without this there is a risk that we could lose some local discretion when deciding on planning applications.

In addition, we think that there is an opportunity to simplify the Local Plan by streamlining it so that it only has the policies that we really need. This would make the plan easier to understand and implement, which in turn will make it more effective.

The Local Plan for Leeds is being updated in two stages:

1. Policies that directly relate to addressing the climate emergency (including carbon reduction, flood risk, green and blue infrastructure, place-making and sustainable infrastructure) are being addressed through the **Local Plan Update**. This targeted update is now at an advanced stage of preparation, and will soon be submitted to the Government for examination.
2. All other policies will be addressed through the **Leeds Local Plan 2040**. This is currently at an early stage of preparation, and this consultation seeks your views on what this plan should contain. More details on the topics that the plan might address are provided below.

Both the **Local Plan Update** and **Local Plan 2040** will make changes to the existing Local Plan and will have a plan period of between 2022 and 2040. They will include amended policies which build on those we already have or replace them because they are now out-of-date, or which are no longer needed. There are also new policies dealing with matters that aren't already covered in the Local Plan. In some instances the changes to policy might be relatively minor, whilst in other cases there might be a more significantly changed approach.



## How will the Leeds Local Plan 2040 be prepared?

There are a number of steps to producing or updating a Local Plan. For the **Leeds Local Plan 2040** we are proposing that there will be five key stages:

1. **Scoping** – the current stage where we seek views about what the plan will address and what it should aim to achieve

2. Issues and Options – where we carefully consider the comments you’ve sent us alongside evidence that we have developed, to identify the issues that the Plan needs to address and what the options for doing this are
3. Publication – where, taking into account your comments, we draft detailed policies which specify what will be expected from developments.
4. Submission - where we make sure that our final draft policies are sound and legal before submitting the Plan to the Secretary of State for independent examination by a planning inspector
5. Adoption – where, following independent examination (and any proposed modifications), the Council receives an Inspectors Report and can formally adopt the policies as part of the statutory Local Plan.

A wide range of evidence will be prepared and collected to support a Plan, and some details about what we think will be needed are set out in the topic papers in the next section. We will review all options, policies and reasonable alternatives using a ‘Sustainability Appraisal’ to ensure that we understand how they will help us achieve our social, economic and environmental objectives.

## What topics is this Plan likely to cover?

This aim of this consultation is to get your views on what the scope of the Plan should be. At the current time, we think that there are 7 topic areas that the Plan should address:

1. Spatial Strategy
2. Housing
3. Economic Development
4. Role of Centres
5. Minerals and Waste
6. Transport and Connectivity
7. Other topic areas (which could include heritage and conservation, landscape, rural development, community facilities, contaminated land and hazardous substances, and open land and green corridors in open areas)

We have prepared a topic paper for each of these, which set out;

- the links between this topic and other local, regional and national policies or strategies
- what the current issues are
- what new policy might do to address this
- what we need to do to get to the next stage

## How can I get involved?

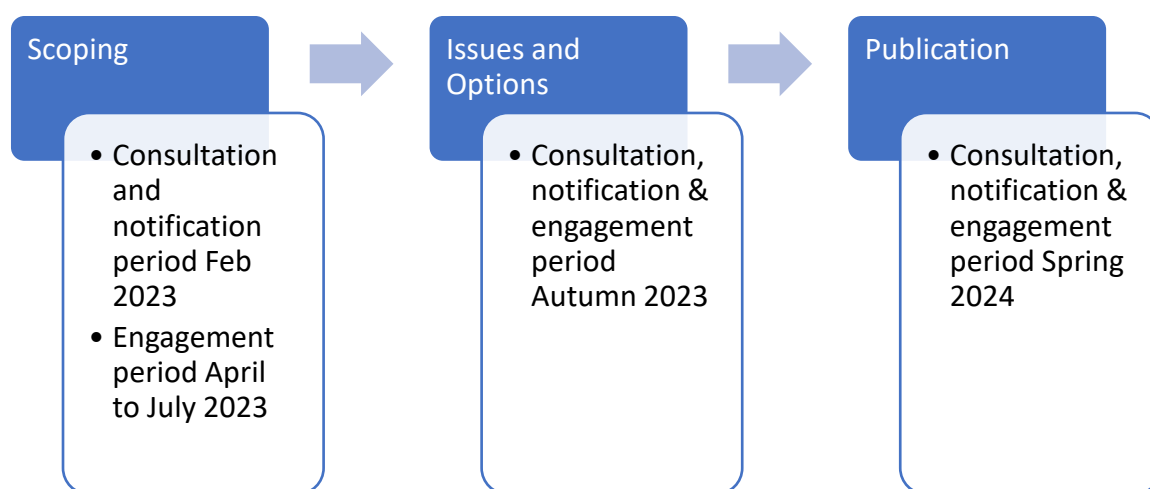
We want to know what **you** think about our the topics we are proposing to include in **Leeds Local Plan 2040**. For each of the topics we are asking some specific questions that will help us understand what you want planning policy in Leeds to address, and what you think we need to consider when developing the plan.

Our engagement with you throughout this process will be central to the success of the Local Plan 2040., and this 6 week consultation is just the start of the conversation about the Leeds

Local Plan 2040. We will continue to engage with communities as we develop our understanding about what the need for new development in Leeds is between now and 2040, and think about what the options for new policies could be.

Throughout the early scoping process, we will engage with communities to discuss what you value about your local area and how you wish to see it develop in the future. At issues and options stage we will come and talk to you again about the choices we have for development in your community.

We will also undertake further formal public consultation on these potential options, before detailed planning policies are drafted. This will enable you to let us know what you think at each of the key stages in the plan making process.



## What land might be developed?

At this early stage in the process, we don't know what land might be developed. Much will depend on what the District's overall identified needs are and what the overall spatial strategy for distributing development looks like.

However, we do expect that, in order to meet the needs of our residents and businesses up to 2040, the **Local Plan 2040** will need to identify additional land for development. So that we can look at all potential options for this – and chose the most suitable sites where new sites are needed – we also want to hear from you if you have any suggestions for sites that should be considered when we are developing the Local Plan. This is known as the '**Call for sites**'.

This could include sites that you think might be suitable for development of a wide range of uses – such as housing (including market led housing development, affordable housing and specialist types of housing, including for Gypsy and Travellers and Travelling Showpersons), industrial and commercial development, community uses, tourism, minerals, waste, renewable energy and energy storage, or a mix of uses.

Just because a site is submitted to us does not mean it will be suitable for development. If a need for new allocations is identified, we will need to carry out detailed assessments of the site to determine whether it would potentially be suitable for development, which will include considering a range of environmental factors. Once we know what sites there are that *could* be suitable for development we will need to make decisions, working with communities, about which of the potential options would be the best to develop in order to meet the identified needs.

## Leeds Local Plan 2040: Scoping Topic Paper

### SPATIAL STRATEGY

#### VISION

At a national level, the NPPF is clear that the purpose of the planning system is to contribute to the achievement of **sustainable development**. It requires that economic, social and environmental objectives are pursued at the same time through Local Plans that provide a positive vision for the future of their area, and with planning policies that play an active role in guiding development towards sustainable solutions. This means delivering the housing and employment growth that places need in order to function, in ways which also support healthy communities, protect our environment and lower carbon emissions. As part of this, Local Plans need to set out an **overall strategy for the pattern and scale of development in their area**. This is most commonly termed the 'Spatial Strategy'.

The Spatial Strategy offers the best opportunity at a high level to set out how Leeds will pursue the UN 17 Goals for Sustainable Development; address social progress, economic well-being and environmental protection as set out in para 7 of the NPPF.

At the local level, the Best City Ambition sets the overall vision for the future of Leeds. The spatial strategy of the Local Plan needs to align with this vision for Leeds, ensuring that growth and development across the city is managed to help support the delivery of this overall ambition. This means that the spatial strategy of LLP 2040 will need to focus on;

1. **Health and wellbeing:** enabling better and more equal access to essential health and learning services and communities in which residents feel more secure, with safe connections to local parks or green space, and quality homes that support good health, wellbeing and educational outcomes;
2. **Inclusive growth:** supporting Leeds as an outward looking global city and ensuring that economic growth is supported, with its benefits distributed fairly across the city with opportunities for all, recognising that place matters and positive identity, culture, heritage and pride in our communities are vital assets.
3. **Zero carbon:** creating vibrant places where residents have close access to services and amenities, which encourages people to be physically active and reduces reliance on the private car and where buildings are net zero.

#### CURRENT ISSUES

Leeds is the second largest City outside of London and its population is forecast to grow by around 37,000 people between 2022 and 2040<sup>1</sup>. Leeds has a responsibility as one of England's largest provincial cities and as the centre of the Leeds City Region to grow and perform well economically. This is set in the context of a national housing crisis where it is recognised that England needs to build 300,000 homes per year, and our cities need to take the responsibility of their proportion of this growth.

- How would you accommodate this growth?

<sup>1</sup> Based on 2018-based subnational population projections

- Do you think it should all be on brownfield land? If so, is there enough brownfield land to go round? Are the incentives there to build it? Is the brownfield land in the right places to meet local needs?
- Should we protect the Green Belt at all costs? What circumstances would warrant planned release of Green Belt land for development?
- Just how should Leeds expand? How should this fit with public transport and infrastructure provision? How can all of this be funded?

These are the questions which we must pose ourselves and have a discussion about through the Leeds Local Plan 2040. Often growth (and housing growth in particular) is viewed as a problem, but it is a means of investment, creates opportunities to regenerate and reshape places and fundamentally provides a home for people who currently don't have one.

The Spatial Strategy is currently set out through Spatial Policies 1-13 of the Core Strategy. Spatial Policy 1 sets out the approach to the location of development which is currently implemented through the Local Plan. It is based on a **Settlement Hierarchy**, and seeks to direct the **largest amounts of development to the City Centre, Main Urban Area and Major Settlements**, taking advantage of existing services, high levels of accessibility, priorities for urban regeneration and an appropriate balance of brownfield and greenfield land.

For the purposes of distributing housing development, Leeds is also currently divided into 11 'Housing Market Characteristic Areas' (HMCAs), which reflect functional housing submarkets. These had benefits in breaking down the large Metropolitan District of Leeds, into smaller more manageable areas, for the purposes of making site allocations, and enabling the relative benefits of sites within an area to be compared. However, **they don't necessarily fully reflect how people understand their neighbourhood or area** and therefore need to be reviewed

Through the Site Allocations Plan, more opportunities were found to be available in sustainable locations within the City Centre and Inner Areas on brownfield land<sup>2</sup> than was anticipated when the housing needs were indicatively distributed to HMCA areas in the Core Strategy. There is a need to reflect on this<sup>3</sup>, and **consider whether the balance between development in the city centre / inner city and other parts of Leeds is the right one** i.e. whether it remains sustainable and will **meet wider objectives and needs in the long term**.

Since the Core Strategy was adopted the Council has declared a **Climate Emergency**, which puts increased emphasis on the importance of ensuring the sustainability of development from an environmental, as well as a social and economic perspective. The **Best City Ambition** has also been published, and a number of other Council strategies updated. There is a need therefore to ensure that the spatial strategy continues to manage development in such a way that maximises its contribution to realising the ambition for Leeds.

New evidence on the walkability of neighbourhoods in Leeds and accessibility to services has also been produced. This identifies which places in the district have the best levels of accessibility, as well as places where improvements to accessibility and/or the range of services and facilities would be needed before they could function as '**20-minute neighbourhoods**'. The Local Plan Update introduces the 20-minute neighbourhood concept and there is a need to consider more fully **how this evidence could inform how growth is spatially distributed** over the next plan period (2022-2040) in order to maximise the accessibility of development.

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<sup>2</sup> since 2012 79.4% of all housing development has been on brownfield land

<sup>3</sup> since 2012 53%<sup>9</sup> of all housing development approved (and 60% since 2019/20) has been in the city centre and the inner city



New evidence on future **flood risk** across Leeds has also been developed since the adoption of the Core Strategy. This has informed a number of new policies proposed in LPU1, and needs to be taken into account when planning for future growth across the City.

SP1 is complemented by a series of further spatial policies, which set out a number of specific spatial priorities for the city centre, regeneration priority programme areas, economic development, the Green Belt and transport infrastructure investment. There is a need to review **policies aimed at supporting regeneration in the City** continue to be effective. Some of the schemes identified within these spatial policies have also been implemented, and others require review to ensure that they remain **up-to-date and reflect local priorities and future opportunities** over the next plan period.

## WHAT MIGHT NEW POLICY DO TO ADDRESS THIS?

Through LLP 2040 it will be necessary to make choices about how Leeds grows over the period 2022-2040 in order to best meet social, economic and environmental objectives. This will require an understanding of the Metropolitan District, its opportunities and constraints and the levels of growth we are likely to be dealing with in the long term. Account will also need to be made of a range of factors and consideration of how different objectives may be influenced or affected by different patterns of development. Key factors include;

### Accessibility

**Context:** The accessibility of new development to services, facilities and transport infrastructure is very important. New evidence on walkable accessibility and the presence of '20-minute neighbourhoods' in Leeds could potentially change the way in which accessibility is interpreted through the plan, and the way it shapes the overall strategy.

**LLP 2040:** There is an opportunity for the spatial strategy for LLP 2040 to relate more directly to the 20MNH approach. It could seek to support and maintain existing 20MNHs, consider how development could improve how well existing places function as 20MNH and/or look to create new places which have the characteristics of 20MNHs. The 20MNH approach could also have implications for the 'hierarchy' of settlements defined through the Spatial Strategy, and the amount of growth directed to different locations. As part of this, consideration will need to be made of what the opportunities are for delivering new infrastructure alongside and/or independent of development and the role that the planning system can have in influencing this.

For some non-housing uses (for example employment, minerals and waste development) accessibility to facilities that are not considered through the 20MNH approach will also be relevant in determining the most appropriate locations for future development, for example rail freight links or public transport accessibility. These will need to be taken into account in planning for these uses, and making sure that opportunities for new employment have good links with places where people live, or that residential development is well supported by other types of services and facilities.

### Regeneration and Inclusive Growth

**Context:** existing Core Strategy policy identifies 4 'regeneration priority programme areas', based on the Council / HCA Local Investment Plan 2011-2015, and the Aire Valley is identified as a location for major economic development and regeneration. The Local Plan has a role to play in supporting regeneration activity in Leeds, and supporting the objectives of the Inclusive Growth and Health & Wellbeing Strategies.

**LLP2040:** The Plan will need to determine, reflecting up-to-date evidence and wider Council initiatives, whether areas should be identified as regeneration priorities for the plan period. Consideration will need to be made of the vision and objectives underpinning regeneration activity in these areas, the role that the Local Plan can have in supporting and enabling this (including interventions that could be made through the plan that support the market to bring forward sites in these locations), and there are any specific development needs in these areas that should be reflected and/or prioritised through the Spatial Strategy.

#### **Viability and Land Value Capture**

**Context:** Development viability varies across the city, with the opportunities to secure affordable housing as a proportion of market housing development (or any other forms of planning gain) being greater in higher value areas. As a result, the spatial distribution of housing development will have direct implications for affordable housing delivery, or opportunities for other forms of land value capture.

**LLP 2040:** Consideration will need to be given to the extent to which maximising affordable housing delivery, or any other form of planning gain, should be prioritised, and the implications that different patterns of growth may have for the delivery of affordable housing. In terms of affordable housing specifically, this will need to be considered in conjunction with the review of affordable housing policy more generally.

#### **Land supply**

**Context:** The current spatial strategy, in line with national policy, seeks to prioritise the use of previously developed land in urban areas, but allows for urban extensions to meet local needs. This has a direct influence on the spatial strategy, as the supply of previously developed sites is predominantly focussed in the City Centre and Inner Area. Infill sites within the settlement hierarchy are also prioritised.

**LLP 2040:** Through the Spatial Strategy, consideration will need to be made of what potential land is available for development for housing, employment and other uses. A 'call for sites' will be needed to determine where there is landowner, developer, minerals or waste operator or community interest for development. However, the Council will also need to carry out detailed work on the main sources of land supply. This will include looking at:

- undeveloped brownfield land capacity within our existing urban areas
- intensifying existing development, such as sub-dividing larger homes, garden developments, developing on car parks or building to higher densities
- remodelling existing areas, such as industrial areas or making better use of town and local centres
- extending the edges of settlements

- strategic new settlements either through urban extension or stand-alone places.

As part of this, an Urban Capacity Study will need to be undertaken to determine the extent of development opportunities within urban areas, and how varying density requirements may affect the capacity of the land supply. Consideration will need to be made of how these sites are spatially distributed, and how they align with identified needs for development and other objectives of the Plan. There will also be a need to consider what role land currently designated as 'Rural Land' or as 'Green Belt' could or should have in meeting development needs. National Policy makes clear that the release of Green Belt land should only be considered in exceptional circumstances, when all other reasonable options for meeting identified needs have been fully explored. If such a need arises, the Plan will need to set the priorities for considering options for Green Belt release.

#### **Development constraints**

**Context:** There are a number of factors that may limit the scale of and/or potential for new development in some locations. This includes flood risk, biodiversity, heritage and green & blue infrastructure considerations. The local character and distinctiveness of places within Leeds also need to be respected, and the capacity of existing infrastructure may (if not addressed) place a limit on the extent of growth that could be supported in some locations. Funding, land values and the need to ensure that development is viable to a developer can also be a constraint.

**LLP 2040:** The Spatial Strategy will need to reflect on the latest evidence in relation to the constraints noted above, and consider what implications they have for the scale of growth that could be directed to different locations.

All of the factors identified above will need to be considered **in conjunction with each other**, and alongside the wider work being done to establish the need for different types of development over the plan period. The choices made through the Spatial Strategy will have direct implications for new/revised policy developed for all of the topics that are addressed through LLP 2040, and regard will need to be had to the evidence that is prepared in relation to the wider topic areas. Consideration will also need to be made of any **cross-boundary implications** that different approaches to the Spatial Strategy may have (particularly in terms of its transport implications, and the role that Leeds could/should have as a location for industrial or logistics development), and how it aligns with the plans and aspirations of neighbouring authorities and WYCA.

**A range of alternative options will need to be explored**, and with the relative merits of each being considered before any conclusions are reached. This recognises that different options will be likely to benefit different objectives, and views may the preferred strategy will vary dependent on how different stakeholders prioritise different factors.

As part of considering the above, there will also be a need to determine **how development needs are related to individual locations**. The Core Strategy currently breaks down overall housing needs into HMCA areas, whilst employment needs are expressed (by type) at a city-wide level. Options could include breaking this down to settlement, ward, HMCA or another spatial level, and the relative merits of different approaches (and how they relate to the evidence of development needs) will need to be considered.

## WHAT DO WE NEED TO GET THERE?

The spatial strategy relates to work being delivered by a range of services across the Council, including planning, regeneration and transport. As a result, it will be vital that it is **developed in partnership** with relevant sections, ensuring that opportunities to support wider objectives through planning as taken wherever possible.

To inform the development of the spatial strategy **further analysis of the evidence on 20MNH** will need to be undertaken, to determine how it could influence / inform understanding of the opportunities for new development across the City.

An **Urban Capacity Study** needs to be prepared to determine what opportunities there are for development within the urban area, how this is spatially distributed, and the extent to which this would meet the needs arising over the plan period (in quantitative and qualitative terms). If there is insufficient capacity within urban areas, or the opportunities available would not meet identified needs and other priorities, then a **Green Belt Review** may be required to identify potential options for Green Belt release. It is proposed that a **'Call for Sites'** is undertaken alongside the scoping consultation to enable potential development sites to be identified by local communities, landowners, developers or other interested parties, which will help inform this work.

The **Infrastructure Study** will need to be updated, in order to identify any constraints to growth posed by the capacity of existing infrastructure in particularly locations, and the extent to which there may be opportunities to address this as part of any new development. We will need to work closely with infrastructure providers to prepare this, to ensure that there is a joined-up approach to infrastructure provision over the plan period.

## Leeds Local Plan 2040: Scoping Topic Paper

### HOUSING

#### VISION

The Best City Ambition is our overall vision for the future of Leeds focussed on improving outcomes across the 3 Pillars of health and wellbeing, inclusive growth and zero carbon. The Leeds Housing Strategy (2022) vision is to meet affordable and social housing need, promoting independence and creating sustainable communities to make Leeds the best place to live.

The Council is committed to address challenges of meeting the needs for new homes, improving housing standards and affordability against the trends of rising costs and the concentration of poor quality housing in some communities, combined with the significant expansion of the private rented sector in inner city areas.

To realise this ambition LLP 2040 will focus on:

1. **Health and wellbeing:** working with housing developers, agents and applicants to improve poor quality housing, so everyone can have a home which supports good health, wellbeing and educational outcomes.
2. **Inclusive growth:** break the link between poverty and inequality, and poor health and wellbeing outcomes, exacerbated by the pandemic by tackling wider determinants such as housing to improve access to health and care by providing the right homes in the right places.
3. **Zero carbon:** addressing the challenges of housing quality and affordability, tackling fuel poverty by creating vibrant places where residents have close access to services and amenities.

The updated NPPF (2021) specifies that within the context of the overall housing requirement, the size, type and tenure of housing needed for various groups should be assessed and reflected in planning policy, including those requiring affordable housing, older people, students and those wishing to build their own homes.

The Levelling Up and Regeneration Bill (2022) contains provisions which are relevant to the setting of affordable housing policy.

#### CURRENT ISSUES

The requirement figure for housing is 3,247 homes per annum and is set in the adopted Core Strategy (September 2019). LLP 2040 will need to grapple with issues that have impacted upon **the supply and delivery of housing in Leeds** in recent years such as demographic changes to households (such as the aging population, divorce and birth rates, as well as international migration), Brexit, Covid-19, and the cost of living crisis. Leeds has a diverse housing market stretching from a compact city centre with fringe city centre areas to regeneration priority inner areas, extensive city suburbs, major stand-alone settlements and dispersed smaller rural villages within green belt and open countryside.

The Council has made significant increases in the overall housing land supply in recent years with record numbers of approvals been granted. This has meant that a five-year housing land supply has been demonstrated. The **pipeline of supply is heavily focussed on the city centre**

**and inner areas** with a large amount of student accommodation contributing to overall numbers. Some major settlement extensions are also progressing, such as at East of Wetherby, East Leeds Extension, Skelton Gate, East of Otley and south of Morley.

However, not all parts of Leeds benefit from the delivery of new homes to meet local needs and this can be a particular issue where new market housing is being relied on to deliver new affordable homes. This focus on the City Centre and Inner Area where affordable housing requirements are 7% of market housing means that the Council is not meeting identified needs for affordable housing for the District as a whole.

The current Core Strategy and Site Allocations Plan focusses on **overall housing needs and seeks to allocate land to meet indicative targets by housing market characteristic areas**. This may be too broad a geography to establish specific local needs and LLP 2040 intends to have a greater focus on assessing the size, type and tenure of housing needed for different groups in different localities across Leeds.

### WHAT MIGHT NEW POLICY DO TO ADDRESS THIS?

LLP 2040 will need to have a policy focus that as a starting point meets the full requirements of the NPPF, supporting the vision set in the Best City Ambition Leeds Housing Strategy and consistent with the policy basis set by the Local Plan Update.

At the present time overall numbers will need to be based on the Government's methodology for Local Housing Need (LHN). LLP 2040 will confirm the LHN figure for Leeds using the Government's 'Standard Method' and take into account the Government's 35% Urban Uplift so as to illustrate what this means for the District.

The 35% uplift is expected to be met in the existing urban area. LLP 2040 will need to evidence that the capacity of land in the existing urban area can achieve this and what repercussions there are for the spatial strategy as a result.

New LLP 2040 policy could be focussed on:

- 1. Overall housing requirement:** The current LHN figures suggest an increase of around 900 units per annum on the current Core Strategy target i.e. over 4,000 new homes per annum. This would necessitate land allocations for new sites over a new plan period.
- 2. Affordable Housing needs:** requires an updated understanding of the need and requirements for affordable housing by location, relating to the settlement hierarchy and evidenced by 2021 Census. Setting appropriate plan targets, maximising delivery through planning obligations and supporting other methods of delivery through the planning system, in light of overall need whilst considering issues that influence delivery such as viability.
- 3. First Homes:** Local authorities are required to deliver First Homes as a proportion (25%) of their usual affordable housing delivery through their local plan policies. LLP 2040 is to provide the basis for the Council approach to set different criteria, if appropriate. This will include consideration of market value discount percentage, first sale price cap, household income and local connections test.
- 4. Housing needs for different household types at a local level:** setting the need for units according to their size (number of bedrooms), type (houses, bungalows, apartments) and tenure (for affordable housing only) for both market and affordable homes by location.

- 5. City Centre:** recognising the different type and scale of housing development and that this area is the focus for Build for Rent. Reviewing delivery methods especially in terms of affordable housing needs, successful delivery on site, registered providers interest and affordability of units.

This includes consideration of the following sub-topics:

#### **Housing mix**

**Context:** Developments should include an appropriate mix of dwelling types and sizes to address needs measured over the long term taking into account the nature of the development and character of the location. Monitoring of current Core Strategy policy reveals an over provision of 1 and 4+ bedroom properties and an under provision of 2- and 3-bedroom homes. This is reflection of the current land supply which is heavily skewed to 1 bed flats in the city centre and any sites in the outer areas providing large homes of 4+ bedrooms.

**LLP 2040:** Proposals for housing must aim to provide a mix of housing suitable for different household types which reflect changes in household composition in Leeds in the types of dwelling they provide in those locations. This must consider the latest evidence of the need for different types of housing through latest demographic data.

#### **Affordable housing**

**Context:** The Strategic Housing Market Assessment (2017) identifies an annual need of 1,230 affordable dwellings across Leeds (on year requirements + backlog) which is not being met. There is very limited scope to increase the % targets for delivery through planning obligations (S106) therefore other methods (which currently deliver about 75% of affordable homes) need to be maximised. The size, type, tenure and location of affordable homes does not necessarily meet need. The City Centre is the focus of much development (including Build for Rent) but the nature, scale, size, type, tenure and affordability does not necessarily meet need.

**LLP 2040:** Consider need as set out in the updated SHMA in terms of numbers, type, size, tenure, location and review affordable housing policy to maximise delivery that meets need. Look beyond S106 delivery at ways to support and facilitate other delivery mechanisms e.g. RPs, the Council. Embed the national First Homes policy at a local level and consider how specifically the City Centre can meet need within the wider development context.

#### **Self-build opportunities**

**Context:** Part of the Housing and Planning Act 2016, local authorities are required to help find land for those who have an interest in building their own home. The Bacon Review commissioned by the Prime Minister in April 2021.

Richard Bacon published his report in August 2021 'Independent review into scaling up self-build and custom housebuilding: report'. Relative importance to Leeds is the number of individual entries on our self-build register. Out of 328 authorities, Leeds is placed 7th in total with 847 registrations

**LLP 2040:** Consider options to provide plots to meet the demand for self-build opportunities. This could include the requirement to provide a proportion of plots on larger sites to be made available for self-build schemes. To be led by forthcoming planning reforms.

#### **Older persons accommodation**

**Context:** Aging population requires the Council to understand need for older persons accommodation through the provision of extra care housing, supported living and care homes. NPPF requires authorities to assess need for of extra care accommodation for older people.

**LLP 2040:** Design accessible neighbourhoods with quality services nearby to enable our aging population to thrive. Address challenges of housing quality and affordability against the trends of rising housing costs and the concentration of older poor quality housing in low income communities.

#### **Student accommodation**

**Context:** Demand and supply of student accommodation in Leeds has changed significantly over the last 20 years. Rapid increase in the supply and delivery of purpose-built student accommodation (PBSA) schemes in recent years moving from a model of co-living in the outer areas to the occupation of self-contained studio units in the city centre. PBSA is becoming more expensive as developers seek to maximise returns by offering top-end products.

**LLP 2040:** Understand capacity and forecast future demand for PBSA. Take a strategic approach to student housing in Leeds in the first half of 2022, that reviews the size and quality of the market and how it interacts with other sectors.

#### **Co-living**

**Context:** Recent planning activity suggests that this type of accommodation is going to become more popular. Co-living is an undefined type of development in the NPPF does not fall within a particular use class and therefore does not have to conform to nationally prescribed space standards for housing. Need evidence of the need/demand for this accommodation and whether there is a need for affordable co-living accommodation.



**LLP 2040:** Consider approach to co-living accommodation and the provision of on-site affordable units as part of schemes. Also investigate options for co-living to be supported in a limited number of identified locations with controls on the level of supply.

#### **Housing in Multiple Occupation (HMOs)**

**Context:** Current Core Strategy policy provides no definition of 'high concentrations' in policy in terms of a trigger point for new proposals. The interpretation is that the defined areas of 'high concentration' are the areas that fall within the HMO Article 4 directive area. The Article 4 Directive area focuses on removing powers for properties to convert to HMOs. In addition, present policy does not cover HMOs applications that are outside the Article 4 Directive Area.

**LLP 2040:** Consider approach to HMO schemes including HMOs that are not within the Article 4 Directive area which do require planning permission. Explore expanding scope for the Article 4 Directive area.

#### **Accessible housing and bespoke needs**

**Context:** Monitoring of approvals for planning permission reveals that Policy H10 targets for both M4(2) 'accessible and adaptable dwellings' and M4(3) 'wheelchair user dwellings' are currently being met. This relates to recording of liable schemes for the development of new dwellings of 2 or more dwellings (new build developments only - excludes conversions, change of use, care homes and student accommodation).

**LLP 2040:** Consider whether there is a need to expand beyond requirements for accessible homes to include other bespoke needs such as provision and requirement of homes build to meet the requirements of those with mental impairments. Seek to identify land which would be particularly appropriate for sheltered or other housing aimed at disabled people.

#### **Gypsy and Travellers & Travelling Showpeople**

**Context:** Like most other parts of the country, Leeds has a shortage of authorised Gypsy and Traveller (G&T) sites. There are also some concerns over the deliverability of previously identified sites. In addition, there is a requirement to update needs assessment for pitches and plots, as set out within the adopted Site Allocations Plan (2019), policy HGR2.

**LLP 2040:** Be responsive to changes in need arising. The Council are in early discussions with the Gypsy and Traveller Exchange (GATE) regarding a new needs assessment. Depending on the results of that assessment, there may be a need to allocate additional G&T pitches. Similar discussions are required for showperson plots. There is also an opportunity to review the implementation of Leeds' negotiated stopping strategy and whether any permanent transit sites are required.

### **WHAT DO WE NEED TO GET THERE?**

The Council is seeking to commission a Strategic Housing Market Assessment (SHMA) . The 2022 SHMA will be a key piece of evidence to support preparation of LLP 2040.

The SHMA will be completed in stages to support plan preparation. A baseline report on the current position and issues relating to each of the agreed topics to allow the Council to undertake consultation on the early stages of LLP 2040.

A SHMA is not a point in time assessment and should provide the strategic evidence to enable the Council to understand how the housing market will change over the next 16 years, including the cyclical nature of the housing market and implications for projections.

The SHMA will be used by the Council to inform the scope of LLP 2040 and provide the evidential basis for detailed policies on each of the housing topics to support the Council's housing strategies.

HMO evidence to show where high levels of concentration of HMOs in and beyond the Article 4 Directive area.

For an updated position on the need for G&T and showperson pitches, a needs assessment is required. Previously, the Council has worked with Leeds GATE to calculate local needs, and discussions have already started on what is required to undertake the assessment for LLP 2040.

## Leeds Local Plan 2040: Scoping Topic Paper

### ECONOMIC DEVELOPMENT

#### VISION

The Best City Ambition is our overall vision for the future of Leeds focussed on improving outcomes across the 3 Pillars of health and wellbeing, inclusive growth and zero carbon. The Inclusive Growth Strategy sets out how Leeds City Council alongside other key stakeholders can work together to grow the Leeds economy ensuring that everyone in the city contributes to, and benefits from, growth to their full potential, setting out twelve “big ideas”.

The Council is committed to meeting the current and future employment requirements of Leeds and the wider Leeds City Region to support the continued growth of job opportunities for local people, whilst addressing global and national challenges which are directly and indirectly shaping and influencing employment land and availability across the city.

To realise this ambition, LLP 2040 will focus on:

- 1. Health and wellbeing:** Encouraging the delivery of employment opportunities within mixed-use and accessible developments across Leeds to create well-designed places that supports good health and wellbeing for all parts of the city.
- 2. Inclusive growth:** Reshaping our economic development policies to support an inclusive, diverse and thriving federal economy in order to maximise our potential to deliver a wide range of job opportunities across the city that are accessible and available to all, recognising the importance of a highly skilled workforce and supporting the local training and skills necessary for this.
- 3. Zero carbon:** Supporting and encouraging the development of sustainable and flexible buildings and taking advantage of opportunities to support the transition to a low carbon economy, as well as directing jobs close to communities to encourage sustainable methods of transport.

The updated **NPPF (2021)** specifies LPAs should set out a clear economic vision which positively and proactively encourages sustainable economic growth, setting criteria and allocating strategic sites to meet anticipated needs whilst simultaneously offering a flexible approach to meet those needs and working practices not anticipated.

**NPPG** provides further guidance in that LPAs should prepare a robust evidence base to understand existing business needs and which should be kept under review to reflect local circumstances and market conditions, which also assists in forecasting future need of employment land and allocating appropriate land to deliver this.

#### CURRENT ISSUES

Current employment land requirements are set out within the adopted Core Strategy (as amended) and run until 2028 being based on evidence prepared in 2010. There is a need to look ahead at employment needs and requirement over the next 15-20 years as part of a wider economic development strategy which **will require an update to the evidence base**. Work is currently underway in updating this evidence base incorporating a range of qualitative and quantitative methodologies (including workshops with commercial stakeholders) to provide context on the current employment market and help forecast future employment requirements and needs. Preliminary conclusions from this suggest that the land required to meet current and future employment supply needs would be greater than the current supply position of available employment land, and so likely require the identification of additional land.

The existing Local Plan contains a series of site allocations as part of the UDPR (2006), AVLAAP (2017) and Site Allocations Plan (2019). **A review of sites is therefore necessary** to ensure that the sites allocated in the Local Plan for employment uses remain fit for this purpose and are deliverable, particularly those allocated within the UDP or based on planning permission that have since expired. Consideration also needs to be taken into HS2 safeguarded land (which accounts for approx. 50ha of allocated land) and the continued uncertainty surrounding this.

The **economy has significantly changed at both the national and global levels** since Leeds' economic development policies and allocations were first adopted, and thus LLP 2040 would need to consider issues and associated implications – such as the Covid-19 pandemic, Brexit, supply chain interruptions, cost of living and energy crisis and other changes to economic markets and trends.

**Employment sectors** also need to be considered as part of LLP 2040, with an approach needed to cater and encourage a diverse economy whilst also being flexible and preparing for any uncertainties or changes. The Core Strategy currently sets broad requirements and allocations for the two 'general employment' land (mainly industrial & warehousing uses) and 'office' uses. One option could be to identify the needs of specific economic sectors (such as logistics, modern manufacturing, research and development, creative industries etc) in relation to land requirement and size, type and location of sites to help support the sustainable growth of such sectors. There will also be an overlap with the consideration of minerals and waste management needs since these are important elements of a successful economy.

LLP 2040 would also need to consider the **implications of changes to Permitted Development rights and the formation of Class E**, which allows for changes of use of some employment premises to other commercial and residential uses without the need for planning permission. This has the potential to result in a greater loss of existing employment premises across the city, and a new approach to protect and safeguard such land to ensure economic growth is not impeded may need to be explored.

Tourism (leisure and business) also forms an important part of Leeds' economy. The UDP includes a number of saved policies relating to tourism development which support the retention and enhancement of existing visitor attractions and facilities and the creation of new ones. Specific support is given for leisure and tourism facilities at Elland Road, Middleton Broom/Middleton Park, Parlington, Royal Armouries (Clarence Dock), Dick Lane (Pudsey) and Barrowby Hall (Garforth). Support is also given to appropriate waterways related leisure developments. Significant changes have taken place to the city, its attractions and facilities, and the visitor economy since the adoption of these policies in 2001 and the implications of this for planning policy could be explored.

## WHAT MIGHT NEW POLICY DO TO ADDRESS THIS?

LLP 2040 would need to review its current supply of employment land and forecast future demand to prepare for any expected growth in job opportunities and necessary employment land based upon up-to-date and robust evidence. This may involve the allocation of new sites to provide this, as well as a review of existing sites to ensure these remain fit-for-purpose and are likely to be delivered. This would need to account for any necessary growth in employment land, as well as the loss / replacement of existing employment premises as a result of older stock becoming obsolete or changing to other uses.

Qualitative methods are being used to help better understand the type of sites which may be required as well as understanding specific sectoral needs, and the site allocations process and current policy / targets may need updating to reflect this. For example, further distinction may need to be made between the needs for different sectors (e.g. logistics, research and development, modern manufacturing & creative industries) and the Plan might set out site and policy requirements which may need to be achieved for the site to be sustainably developed for

its preferred use. However, a flexible and pragmatic approach would need to be taken to account for any uncertainty and changes to the market, which may also need to be considered in any new policy wording, as well as to support and not hinder the growth of new and emerging employment sectors.

A new spatial approach may also need to be taken, in order to guide employment development in the right places. This would need to consider the specific requirements of employment uses (i.e. good access to the Strategic Road Network for logistic uses), and the importance of focusing development in areas which are well-connected and accessible to ensure job opportunities are available to all and support inclusive growth across the city. As part of this, consideration could be given to expanding the 'centres first' approach taken for office developments and guiding office developments towards Leeds City Centre and areas which are well-connected and accessible.

it is important to recognise the role that existing employment areas, such as industrial estates, have in meeting economic needs and providing local job opportunities. One option to help address this could be considered, for example through identifying safeguarded employment areas (based on strategic or local importance) alongside a criteria-based approach. This would need to be balanced against the need to be flexible and not sterilise land in one specific use unnecessarily.

In relation to tourism development, there is a need to reconsider how the tourism potential of Leeds can best be supported through the planning system. This will need to be aligned with revised local priorities within the inclusive growth pillar, and the associated strategy for culture. As part of this, consideration would need to be made of the opportunities and requirements in relation to tourism development across Leeds, and the role that a new or updated planning policy could have in supporting this.

## WHAT DO WE NEED TO GET THERE?

External work is currently underway (by Mott MacDonald) to undertake a strategic review of employment land which will begin the process of updating the evidence base required for LLP 2040. This will help forecast future employment land needs and requirements, as well as to help provide understanding of existing supply and market trends and context, which will then inform land supply requirements and allocations over the next Plan Period.

A review of all existing employment sites will be required to establish whether they remain suitable, available and deliverable to meet future employment needs. In addition, a 'Call for Sites' process will be required to identify options for future economic development locations, which will need to be considered in identifying any future site allocations.

A Tourism Study will be required. This will need to review of tourism requirements and opportunities across Leeds, with consideration being made of the role that the planning system could have in directing and supporting potential opportunities for growth in this sector.

## Leeds Local Plan 2040: Scoping Topic Paper

### Role of Centres

#### VISION

The Best City Ambition is our overall vision for the future of Leeds focussed on improving outcomes across the 3 Pillars of health and wellbeing, inclusive growth and zero carbon. The Council is committed to 'Inclusive Growth' and 'Sustainable Infrastructure'; and the role our centres play is important for both these ambitions. Our communities rely on our centres both economically but also in providing a focus for infrastructure and activity. Leeds City Centre is also a hub for the ambition to improve our cultural offer not only locally but regionally providing a focus for economic and social activity.

The National Planning Policy Framework (NPPF) is supportive (para 86) of town centres and retail stating that Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management, and adaptation. However National Planning Policy also recognises that the role and uses within our town centres have changed nationally.

#### CURRENT ISSUES

The landscape of retail and our centres has changed significantly over the last decade. The move to online shopping, accelerated by the pandemic, has reflected a gradual shift in our shopping patterns and the way we use our centres. The Core Strategy defines a network of 61 centres across Leeds which includes the City centre, Town Centres and Higher and Lower Order Local Centres. They all play an important role as part of the City, and to the local communities which they serve. There are a number of existing planning policies in the Core Strategy which address the vitality of our centres, including specific policies on the role of Leeds City Centre, the types of uses acceptable in and on the edge of town and local centres, shopping parades and small scale stand-alone food stores, the approach to new food stores, the creation of new centres and the sequential and impact assessments required for proposals for main town centre uses.

The introduction of the Class E (Commercial, business and service) came into effect from the 1 September 2020. The new Use Class E allows flexibility to move from some 'main town centre uses', e.g. retail, food and drink, offices, but also includes other uses which are not defined as "main town centre uses", e.g. medical services and some industrial uses without the need for planning permission. Policies RTC2 and 3 of the Site Allocations Plan set out policy for primary and secondary shopping frontages and these refer to percentage requirements for the minimum amount of A1 (retail) uses within a frontage. These policies are now out of date as the A1 use class no longer exists. The NPPF has also deleted reference to primary and secondary shopping frontages altogether. This means there is no longer a requirement for these frontages in national planning policy. However, there are clearly benefits to retain these frontages as they provide a strong focus for town centres.

The potential implications of this are that the Council's planning policies predate use class E and as such are potentially out of date, including shopping frontage policy and sequential test policy.

The 'Hot Food Takeaway SPD' adopted (2019) sets out guidance restricting takeaways around secondary schools, limits clustering of takeaways and protects general amenity of surrounding areas. Since it was adopted there have been changes to national guidance which allow planning policy to have regard to evidence indicating high levels of obesity and more control with litter

associated with takeaways. There may be scope to widen the remit of the SPD or address new national policy.

The City Centre boundary was defined through the UDP in 2001. The City has changed significantly since this time and consideration should be given to updating it to reflect current and future development needs. As part of this there will a need to consider what the purpose of the boundary is in planning terms and how this could be best reflected over the next plan period.

Within this overall context it is also a requirement of national policy that Local Plans should set out a strategy for the pattern and scale of retail and leisure provision.

## WHAT MIGHT NEW POLICY DO TO ADDRESS THIS?

LLP 2040 will need to consider the implications that changes to national planning policy, as well as the pandemic and ongoing changes to shopping habits, has for how the role of centres is supported through the planning system. As part of this, the limits to what local planning authorities can control will need to be recognised, as many changes can occur within centres without the need for planning permission.

There are a number of areas which may be addressed as part of policy formulation. These include whether new and/or amended policy required to take account of Class E and the impacts of the pandemic for centres across Leeds. This will need to consider the potential for policy giving clarity over the implementation of Use Class E and what it means in terms of acceptable uses in and on the edge of centres, and the implications for Primary and Secondary Shopping frontages. Options may include leaving policy as it is and producing an internal guidance note to assist interpretation, or amending policy so it sets out guidance on how to interpret use class E. However, there is a risk that by amending frontage policy this will undermine the principle of frontage policy and this may leave centres more vulnerable. The LLP 2040 could also consider updating design policies for shopfronts, advertisements and signage, to reflect modern business requirements and support the attractiveness of centres.

At present the need for many commercial and service uses within Class E are met through changes of use (both permitted and through planning applications), the redevelopment of former employment sites and mixed-use developments. The approach to Class E uses could be specifically considered through LLP 2040, to determine whether this is sufficient going forward, or whether a more proactive approach can be taken in planning for these uses to include permitted development rights to include those to residential. Consideration may also need to be made of the role of out of town centres, or the establishment of any new centres, over the next plan period to 2040.

Leeds City Centre boundary was drawn up over 20 years ago, and the city has changed significantly since this time. Consideration should be given to updating it to reflect current and future development needs. A review of the boundary could reflect up to date priorities and evidence, and as part of this there will be a need to consider what the purpose of the boundary is in planning terms, and how it could be best reflected over next plan period. In terms of boundaries there could be a number of geographical options.

As noted above, National planning policy has been updated on hot food takeaways and LLP 2040 could include specific policy on this, building on current guidance which is provided in an SPD (or the SPD could be updated).

In addition, it is recognised that a sizeable proportion of the allocations in the City Centre are designated for mixed use development, reflecting that a range of different uses would be acceptable on these sites. At the development management stage these sites tend to come

forward as all residential or all office proposals, with some commercial uses. Consideration is needed of how we account for this when making future allocations.

Within this overall context a review of policy also represents an opportunity to consider overall requirements for the scale of new retail particularly within a national context of reduced footfall, and where online shopping, as a proportion of total retail sales, has jumped from 13.% to 30.2% since the Core Strategy was adopted in 2014.

### **WHAT DO WE NEED TO GET THERE?**

- E Class- Depending on the nature of proposals these will need to be assessed to determine what evidence base is required however there are new town centre assessments which can assist, these explore a number of indicators.
- Leeds City Centre- a review of the boundary and uses would need to be undertaken to establish evidence base.
- 'Hot Food Takeaway SPD' current research is being undertaken to assess the impact of the SPD and the potential to go further.
- Evidence base around the City Centre to deliver housing, office and other main town centre uses for mixed use sites.



## Leeds Local Plan 2040: Scoping Topic Paper

### MINERALS AND WASTE

#### VISION

National Planning Policy, set through the NPPF and the National Planning Policy for Waste Policy Paper, sets out a series of requirements to ensure that suitable provision is made for minerals and waste through Local Plans. It recognises that it is **essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods** that the country needs, and that best use needs to be made of them to secure their long-term conservation. Similarly, it acknowledges that **positive planning plays a pivotal role in delivering the country's waste ambitions** and moving towards a more sustainable and efficient approach to resource use and management. The PPG builds on this with further detailed guidance that needs to be taken into account through the plan-making and decision-taking process.

Leeds City Council, as a unitary authority, is responsible for planning for Minerals and Waste development across the District. At the local level, the Best City Ambition sets the overall vision for the future of Leeds, focussed on improving outcomes across the 3 Pillars of health and wellbeing, inclusive growth and zero carbon. Minerals and waste planning has an important role to play as part of this, ensuring;

1. **Health and wellbeing**; ensuring waste is appropriately managed to support good health and wellbeing for all parts of the city.
2. **Inclusive growth**; ensuring there is sufficient supply of minerals to support growth, supporting the job opportunities within the minerals and waste sectors and recognising the importance of a skilled workforce.
3. **Zero carbon**; supporting the transition to the low carbon economy, driving waste management up the waste hierarchy to promote more sustainable use of resources and supporting the sustainable movement of minerals and waste products.

#### CURRENT ISSUES

The adopted Natural Resources and Waste Local Plan contains a series of policies related to planning for minerals and waste. The approach of the majority of its policies is up-to-date and consistent with national policy and local priorities. However, there are some areas where there may be a need to review the policy approach. For example;

- The Government has indicated its intention to support shale gas extraction ('fracking') and to amended national policy accordingly. The adopted NRWLP has no minerals safeguarding area (MSA) for unconventional hydrocarbons and no policy on how we would deal with an application. This means that we would need to rely on national policy to determine any application to explore or extract this resource;
- The adopted NRWLP has no buffer zones for mineral processing activities. In some instances there has been conflict between residential applications and mineral processing activities, which buffer zones would help to manage. Likewise, buffer zones could be useful in considering proposals in close proximity to existing safeguarded railway sidings and canal wharves.

- The landbank for sand and gravel has fallen below the level recommended in the NPPF. There is a need for Leeds to identify ways to address this so as to maintain an adequate supply of minerals.
- The NRWLP forecasts waste arising till 2026. There is a need to look ahead at needs over the period 2022-40, based on up-to-date evidence and collaborative working with other West Yorkshire authorities.
- Some safeguarded sites have gone and new ones have been brought to our attention so we need to take stock of the current provision and identify the capacity gap.
- Some new needs have arisen since the NRWLP was prepared, such as for composting waste and glass recycling.

### **WHAT MIGHT NEW POLICY DO TO ADDRESS THIS?**

LLP 2040 will need to review the current supply of minerals and waste sites, and forecast future needs over the period 2022-40. This may involve the allocation and/or safeguarding of new sites to provide this, as well as a review of existing sites to ensure these remain fit-for-purpose and are likely to be delivered (with sites being de-allocated or released from safeguarding where this is not the case)

As part of this, a new Minerals Safeguarding Area may need to be identified for unconventional hydrocarbons. Consideration will need to be made of what area this should cover, and how it relates to the extent of currently licensed areas and the wider shale gas resource. An associated planning policy for determining any applications for shale gas exploration, appraisal and production in Leeds will also need to be prepared.

Buffer zones for mineral processing activities need to be formally created and an associated policy (to avoid conflict with residential permissions). These could potentially be designated through a new policy or an addition to existing Policy MINERALS 12. The buffers will show the extent of the agent of change principle to ensure this is taken into account through the planning process.

### **WHAT DO WE NEED TO GET THERE?**

New evidence on the needs for minerals extraction in Leeds over the plan period will need to be developed. The recent WYCA Marine Aggregate Report may help to quantify how much need can be met by marine aggregate, and what will need to be met through land-based resources. As part of this, we will need to agree with the other West Yorkshire authorities how we will work together to meet the need for a steady and adequate supply of mineral resources across the region.

There will also be a need to estimate the forecasted waste arisings for the plan period across different waste streams. This can use evidence provided by the Environment Agency Waste Data Interrogator, and will need to consider what technologies might be used and the land need of those so we can work out whether we have sufficient sites to manage the forecasted waste arising for the plan period. As part of this, there will be a need to consult with other authorities to identify tonnages of cross boundary movements and provision in other areas, particularly for waste that goes to landfill.

A review of existing allocations and/or safeguarded land for both minerals and waste uses will need to be undertaken, to established where they remain suitable, available and deliverable to

meet future needs. A 'call for sites' process will be required to identify any new options for consideration as future allocations and/or safeguarding.

In relation to shale gas, there will be a particular need to monitor any updates to National Policy and review wider best practice in determining how the Minerals Safeguarding Area should be defined, and the criteria applied through any associated planning policies.

# Leeds Local Plan 2040: Scoping Topic Paper

## TRANSPORT & CONNECTIVITY

### VISION

The updated NPPF (2021) specifies that transport issues should be considered at the earliest stages of plan-making to ensure that opportunities to achieve sustainable modes of travel are achieved and that developments be focused in locations which are/or can be made sustainable through limited the need to travel and offering a genuine choice of transport modes.

**The Best City Ambition** is our overall vision for the future of Leeds focussed on improving outcomes across the 3 pillars of health and wellbeing, inclusive growth and zero carbon. As part of this, LLP 2040 will need to focus on:

1. **Health and Wellbeing:** ensuring development is located in accessible locations that enable walking and cycling to be the first choice for shortest journeys, and helps reduce the negative impacts of transport on local communities
2. **Inclusive Growth:** to help break the link between poverty and inequality by ensuring everyone has good access to jobs, services and facilities, and that the benefits of economic growth are distributed fairly across the city, creating opportunities for all.,
3. **Zero Carbon:** to deliver a low carbon and affordable transport network which encourages people to be physically active and reduces reliance on the private car, helping people get around the city easily and safely.

**Connecting Leeds** is the Council's Transport Strategy, and sets out a vision to create a city where you don't need a car and where everyone has access to an affordable and accessible choice in how they travel.

**West Yorkshire Combined Authority Transport Strategy 2040** seeks to provide modern, world-class, well-connected transport that makes travel around West Yorkshire easy and reliable. This involves creating a transport network that supports inclusive growth, serves the needs of businesses and people and enhances prosperity, health and wellbeing for people and places across West Yorkshire.

### CURRENT POLICY & ISSUES

Transport and accessibility are currently addressed through a range of policies within the Core Strategy and UDP. This includes Spatial Policies 11 and 12, which set strategic level requirements in relation to Transport Infrastructure Investment Priorities and Managing the Growth of Leeds Bradford Airport, and T1 and T2 which provide more detail in relation to transport management priorities and accessibility requirements.

The accessibility standards in the Core Strategy are based on requirements of the former Regional Spatial Strategy. There is a need to review these, particularly in light of any proposed amendments to the Spatial Strategy, to ensure that a consistent approach is taken to determining whether or not a development is suitably accessible.

The Local Plan Update proposes a new policy that provides strategic level support for the development of Mass Transit in Leeds. As the routes for the mass transit scheme haven't yet been decided, it wasn't possible to safeguard them as part of the Local Plan Update, though it is recognised that additional planning policy will be needed to do this in the future.

The Core Strategy sets out Transport Infrastructure Investment Priorities. There may be a need to review these and consider whether they align with current local priorities and whether we need to explore any additional priorities to support growth over the period 2022-2040.

There have been previous commitments to review the policy approach to Leeds Bradford Airport, however, a number of factors affect the appropriateness of this being included in LPU1. Consideration will need to be made of whether this should form part of LLP 2040.

LLP 2040 will also need to grapple with the issues and opportunities that have emerged in recent years such as the Covid-19 pandemic and the Council's declaration of a climate emergency in March 2019, and the implications that this might have for planning policy on transport related matters. The Covid-19 pandemic changed the way we work and the way we travel and, as of yet, it is unsure whether these changes are temporary or permanent. Since the adoption of the Core Strategy there have been many updates to wider transport policy which many priorities for transport investment shifting towards a greater focus on decarbonisation. Some of the projects identified in policy have also been completed and/or no longer being progressed, while other projects or priorities have emerged.

### **WHAT MIGHT NEW POLICY DO TO ADDRESS THIS?**

In developing any new policy relating to transport and connectivity, it will be important to recognise the limits to what the planning system is able to control and influence, and what measures can be taken through wider transport policy work (such as the Connecting Leeds Transport Strategy). Any other opportunities to support transport planning objectives through spatial planning (and specifically LLP 2040) will need to be explored as part of the plan preparation process.

There will be a need to consider how accessibility standards used to assess planning applications align with the accessibility sought through the Best Council Ambition and any revisions made through LLP 2040 to the spatial strategy. This may present an opportunity to review the definition of "accessibility" and how this relates to related concepts such as "connectivity", and how they relate to different mobility needs.

LLP 2040 could explore other ways that planning policy can be used to support patterns of land use to facilitate shorter, regular trips for active travel. Related to this, LLP 2040 could also explore ways to encourage more sustainable methods of travel by supporting local transport hubs served by public transport networks and connected to active travel paths. As part of this, consideration could also be made of whether the planning system has a role in enabling these hubs to support local 'last-mile' delivery services.

The Council wishes to reduce car dependency in Leeds. As part of this, LLP 2040 could explore the introduction of a road hierarchy into planning policy that would establish a precedent that private vehicle travel is at the bottom of the Council's priorities. Further, in order to measure an overall reduction in car travel and the success of this policy consideration could be made of whether it would be useful to include percentage targets linked to this.

Car parking standards are currently set out in the Transport SPD. One of the main aims of our transport initiatives is to reduce car dependency in Leeds and to reimagine the city as one that isn't dominated by cars. LLP 2040 could look again at parking standards, and consider if they need to be updated and/or the circumstances in which car-free development might be appropriate. The need for any additional park and ride facilities could also be reviewed, and addressed through planning policy where necessary.

LLP 2040 will need to review the transport infrastructure investment priorities over the 2022-2040 plan period. As part of this, ways to ensure that identified priorities are in the Plan remain up-to-date across the plan period could be explored. For example, could a policy be overarching and linked to a separate list of priorities with details of how will be delivered?

In relation to Mass Transit, there is potential that LLP 2040 could seek to safeguard specific routes for a mass transit network (building on the strategic level support provided by the proposed policy in LPU1). The opportunity to include this within LLP 2040 will depend on WYCA's timescales for progressing the Mass Transit proposals aligning with the LLP 2040 timetable. If the two do not align, route safeguarding may need to come through a later Local Plan Update (or separate, bespoke DPD). There is also potential that WYCA may look to coordinate a joint DPD on mass transit safeguarding across all of the relevant authorities, which would also mean that it would not need to be progressed as part of LLP 2040.

LLP 2040 could also look to introduce new policy relating to Leeds Bradford Airport. As noted above, a range of external forces affected the appropriateness of this being progressed as part of LPU1, including the withdrawal of the 2020 planning application, extant planning permission and discharge of conditions associated with the extant planning permission for the airport, a continued gap in national policy, and the efficacy of existing Policy SP12 and all other relevant material considerations to consider any future planning applications. If there was a significant change in circumstances this could potentially be addressed through LLP 2040.

### **WHAT DO WE NEED TO GET THERE?**

Significant new evidence on the accessibility of places within Leeds, and the extent to which they function as '20-minute neighbourhoods' has been developed. This has informed new policy proposed through LPU1, and further analysis of this work is needed to consider how it could potentially inform revised definitions of accessibility / connectivity through LLP 2040. This will need to be closely aligned to the review of the Spatial Strategy, and wider transport policy work.

Research on potential alternative approaches to assessing accessibility / connectivity through the planning process also needs to be undertaken. As part of this consideration will need to be made of how applicable any alternatives might be to the Leeds context, and any resource implications associated with getting any new tools required into place.

## Leeds Local Plan 2040: Scoping Topic Paper

### OTHER TOPIC AREAS

#### VISION

The National Planning Policy Framework (NPPF) emphasises that the planning system should be genuinely plan-led, with decisions being taken in accordance with succinct and up-to-date Local Plans.

The Best City Ambition sets the overall vision for the future of Leeds. Planning policies have an important role in managing development across Leeds and may offer potential to support local priorities within the health and wellbeing, inclusive growth and zero carbon pillars. The benefits that such policies can offer to support these objectives will need to be maximised.

The vision for the Leeds Local Plan 2040 is to ensure the policies:

- Are in conformity with the NPPF
- Reflect any changes to local circumstances
- Reflect any changes arising from revisions to the Spatial Strategy (including where relevant employment and housing land)

The Leeds Local Plan 2040 covers a range of subject areas. The purpose of this topic paper is to identify other topic areas which could also potentially fall within the scope of the Plan. At this first stage of consultation, the scope of the other topic areas has not been decided and will be informed by the consultation and collection of supporting evidence.

#### CURRENT ISSUES

The Leeds Local Plan comprises a series of documents, including the Core Strategy 2014 (as amended by the Core Strategy Selective Review 2019), the Site Allocations Plan (2019), Natural Resources and Waste Local Plan (2013 / 2015), Aire Valley Leeds Area Action Plan (2017) and Saved Policies of the UDP (2006). These contain a wealth of policies, including a number of detailed policies of relevance to particular types of schemes, or schemes in specific locations.

The Local Plan Review (LPR) (2020) concluded that although many of these detailed policies are still generally up-to-date and in conformity with the NPPF, they should be considered for update to **ensure that local priorities are reflected as fully as possible** or to make minor modifications to their terminology. The **effectiveness of some policies** was also questioned by the LPR, with the policy intent being covered by other local or national planning policies.

To inform the scope of Leeds Local Plan 2040 the Local Plan Review (2020) has been refreshed. This has considered whether any changes in evidence, national policy and/or local circumstances have occurred that would result in any other policies needing to be considered as part of the Local Plan Update. As part of this process, the Aire Valley Leeds Area Action Plan which is now 5-years old has also been reviewed.

The **number of policies within the Leeds Local Plan**, and their spread across a series of different documents, can make the Plan **challenging to navigate**. There is an opportunity for Leeds Local Plan 2040 to consider how existing policy could be streamlined. This would make the Plan more succinct and easier to use, which in turn may make the Plan more effective.

For some types of proposal local policy is **currently silent and/or provides limited guidance** on how planning applications should be assessed. For example, whilst there are a number of historic mills within the Leeds District, there is no specific policy addressing how proposals relating to these assets should be considered. Whilst reliance on elements of existing planning policy along with national policy may be sufficient, or other mechanisms (such as Supplementary Planning Documents, or informal guidance notes) may be as effective in addressing any issues, Leeds Local Plan 2040 provides an opportunity to identify if any new non-strategic policies should be introduced to better manage development across Leeds.

### WHAT MIGHT NEW POLICY DO TO ADDRESS THIS?

Leeds Local Plan 2040 could introduce a series of updated policies that set local standards and criteria against which applications can be assessed. These could seek to streamline existing policies and provide clearer and more concise policy. Other topics in Leeds Local Plan 2040 (e.g. the Spatial Strategy, housing and employment land) may also influence changes to or lead to new topic area and related policies.

The Local Plan Review identified a number of existing detailed policies to be considered as part of a future Local Plan Update (but which are not being addressed through LPU1). The Leeds Local Plan 2040 provides an opportunity to consider policies dealing with issues such as:-

- Heritage,
- Landscape
- Rural development (including detailed policies for development proposals in the Green Belt and Rural Land)
- Open land and green corridors in urban areas
- Agricultural land including agricultural and forestry workers dwellings
- Community facilities
- Contaminated Land and hazardous substances

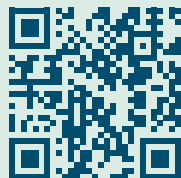
However nothing has been decided at this stage.

For any policies that may be identified through the consultation on the scope of Leeds Local Plan 2040, consideration will need to be given to the scale of any issues identified and the most effective way of addressing this. In some instances new and/or updated planning policy may add value, whilst in other cases reliance could just be placed on national policy (resulting in the deletion of existing policy) or other mechanisms – such as planning guidance to address any issues identified.

### WHAT DO WE NEED TO GET THERE?

A detailed review will need to be undertaken of the scope of existing policies, the scale and extent of any issues relating to their effectiveness and consistency with local priorities and national planning policy, and what the options for addressing this (either as part of Leeds Local Plan 2040 or using other mechanisms) may be.





For further information and to let us know your views by completing the survey,  
please visit our website [www.leeds.gov.uk/llp2040](http://www.leeds.gov.uk/llp2040)