

## Progress update for Leeds Local Plan 2040

Date: 16<sup>th</sup> July 2024

Report of: Chief Planning Officer

Report to: Development Plan Panel

Will the decision be open for call in?  Yes  No

Does the report contain confidential or exempt information?  Yes  No

### Brief summary

This report provides a progress update for Leeds Local Plan 2040 (LLP2040). This will update planning policies relating to the overall strategy for development across Leeds up to 2040, including the amount, type and location of housing, economic, minerals and waste development needed; the approach to the City Centre and local centres; transport and connectivity; and set standards and criteria against which planning applications can be assessed. This paper provides a summary of the key themes and issues emerging from the consultation that was undertaken on the scope of this Plan in early 2023, and the evidence base that has since been and is still being developed to underpin the Plan. It outlines the intention to take an area-based approach as the starting point for planning for housing development that meets local needs in different parts of the District. It also outlines the approach to considering and assessing specific sites, and the next steps leading up to consultation on the 'issues' and 'options' for the Plan intended to take place in November 2024.

### Recommendations

Development Plan Panel is requested to;

- a) Note and comment on the contents of this report.

### What is this report about?

- 1 The Leeds Local Plan establishes the land use and spatial planning framework for the City's development. The current Leeds Local Plan is a set of five Development Plan Documents (DPDs) (namely the Adopted Leeds Core Strategy (amended 2019), the Natural Resources and Waste Local Plan (2013), Aire Valley Leeds Area Action Plan (2017), Site Allocations Plan (2019) and Unitary Development Plan (2006)) mainly covering the period between 2012 and 2028. Together, the Local Plan and Neighbourhood Plans (currently 22 in number) form the statutory Development Plan, which is used, alongside the National Planning Policy Framework, as the starting point to help direct decisions on planning applications in Leeds, subject to other material considerations.

- 2 Local Planning Authorities are required by the Town and Country Planning (Local Planning) (England) Regulations 2012 (amend amended) to review their policies to assess whether they need updating at least once every five years. A full Local Plan Policy Review was completed and published in July 2020, and updated in January 2023. This identified a number of extant policies that require update / amendment of varying scale and degree, arising from changes in evidence base, national or other local policy, or local circumstances since the adoption of these policies.
- 3 In response to this, the Local Plan for Leeds is being updated in two stages:
  - a) The Local Plan Update (“Your City, Your Neighbourhood, Your Planet”) focusses on policies that directly relate to addressing the climate emergency (including carbon reduction, flood risk, green and blue infrastructure, place-making and sustainable infrastructure). This targeted update is now at an advanced stage of development and subject to consideration following Government changes to the setting of net zero policies, will be submitted to the Secretary of State for examination by Spring ‘25. This is covered in agenda item 1 to this meeting.
  - b) The Leeds Local Plan 2040 (LLP2040) will address all other policies relating to development up to 2040, including the overall strategy for development, housing, economic development, city and local centres, minerals, waste, transport and connectivity, and a range of other topics. LLP2040 is the focus of this paper.

### Where are we with LLP2040?

- 4 There are a number of stages to producing or updating a Local Plan, which are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. For LLP2040 it is intended that there will be five key stages, with the next major milestone being consultation on the ‘Issues and Options’ for the Plan;



### Summary of responses to the scoping consultation

- 5 The first milestone in the preparation of a Development Plan Document such as Leeds Local Plan 2040 (LLP2040) is an initial stage of public consultation (‘Regulation 18’ consultation). The purpose of this stage is to ascertain views on what matters the Plan will need to consider and address i.e. its scope.
- 6 Public consultation on the scope of the Plan took place between 10 February and 24 March 2023. It sought views on the proposal for the Plan to address policies relating to the overall spatial strategy, housing, economic development, the role of centres, minerals & waste, transport & connectivity and a mix of ‘other topic areas’ that set standards and criteria against which planning applications can be assessed. Alongside the consultation a ‘call for sites’ was also launched, which enabled anyone to put forward suggestions of sites that they wished to be considered for inclusion in the Plan.
- 7 In total, the consultation attracted over 4,500 unique visitors to the website, with just under 1,000 responses being received. In terms of the material itself, the majority of respondents (68.75%) felt it was engaging, with particular support being expressed for it being mobile phone/tablet friendly (though some did want more hard copies). There were mixed views on the length of the response survey itself, and on the language used within the material, with some

considering it was pitched well and others considering it was too complicated. Several responses indicated a desire to understand how their comments would be taken into account through the Plan.

- 8 Trends identified from these responses included that;
- Whilst 87% people thought it was important to meet local needs for development (with affordable housing being regarded as particularly important), 63% were concerned about development taking place in their area.
  - 75% of people felt they would be more likely to support development in their area if it took place on brownfield land, and 40% would also be more likely to support development if it provided new local facilities, physical or social infrastructure, landscaping / new green space, gains for biodiversity, high quality design, low carbon development, local jobs, affordable housing or different sizes and types of housing
  - The majority of people were opposed to considering changes to Green Belt boundaries, though there was more acceptance of this being considered to meet affordable or specialist housing needs (as opposed to general market housing).
  - 68% of people agreed that the Plan should support people to be able to access their essential daily needs within a short distance of their home, though some mistrust was expressed about the concept of '20-minute neighbourhoods'.
- 9 The responses to the consultation have been considered in detail and will be published as part of the 'report of consultation' that accompanies the next version of the Plan. The key messages relating to individual topic areas will also be presented as part of the consultation material for each topic, to help people see how their comments are helping to shape the Plan.

#### Workshops with members of Development Plan Panel

- 10 Following the consultation, between January and March 2024, a series of five in-person workshops were held with the members of Development Plan Panel. These covered the following topics:
- 15<sup>th</sup> January: Housing
  - 31<sup>st</sup> January: Economic development and centres
  - 14<sup>th</sup> January: Minerals, waste and landscape
  - 26<sup>th</sup> February: Spatial strategy (including transport, Green Belt and countryside)
  - 26<sup>th</sup> March: Next steps and housing part 2
- 11 The workshops aimed to provide an update on key pieces of emerging evidence, highlight emerging key issues and options for the Plan, and seek views from Members on the way forward. They did not cover everything in the wide scope of LLP2040, but instead concentrated on key updates and issues. They provided an opportunity for members to ask questions, discuss the emerging evidence and options, and influence the Plan at an early stage.
- 12 The workshops have helped to focus the development of evidence and the potential options that will be presented for consultation, as well as identifying areas where further clarity or information was needed to help explain or justify potential approaches. The importance of joined-up working across the Council, and with partner organisations such as WYCA, was also consistently emphasised across the sessions.
- 13 The workshops have helped clarify that LLP2040 needs to:
- set a spatial strategy for all parts of Leeds;
  - be based on a locally driven housing need which distinguishes between different types of housing;
  - attach great importance to delivering more affordable housing;
  - seek to provide (and protect) local employment opportunities, as well as strategic sites;

- make early consideration of viability of development so that we are clear as to what new development can and will bring to a place;
- provide clarity on the link between public transport infrastructure, future investment and locations for significant growth; and
- understand the link between new development opportunities and the capacity of (and need for additional) community infrastructure.

### Evidence base development

14 In order to ensure that the Plan is based on a sound understanding of future needs, opportunities and challenges for Leeds, and can be justified (one of the ‘tests of soundness’ that all Local Plans need to pass) it must be underpinned by robust evidence. The development of an evidence base for the Plan has been a key focus of work over the last year, with key studies including:

- **Strategic Housing Market Assessment (SHMA):** This looks in detail at the needs for housing across Leeds. It identifies needs for new housing, of varying types, sizes and tenures, across all parts of the district. The significance of the scale of the need for additional affordable housing in Leeds is made clear by the study, with affordable housing needs being nearly 75% greater than that identified through the previous SHMA in 2017. It also identifies a need to increase and diversify the supply of specialist housing for older people, and for increased proportions of dwellings to be built to accessible standards.
- **Employment Land Needs Assessment:** This looks at the need for additional land/floorspace for employment development in Leeds, in order to cater for the needs of new or expanding businesses. A key emerging message from the study is the likely need for the Plan to identify additional land for general industrial purposes, in order to meet the needs of businesses.
- **Urban Capacity Study:** As the number of sites in the urban area submitted through the ‘Call for Sites’ was quite limited, an urban capacity study has been undertaken by the Council. This has sought to actively identify additional sites within the urban area that may have potential for future (re)development so that they may be taken into account through the Plan. This includes vacant buildings, land around vacant buildings such as car parking and servicing, and other open land within the urban area that is not protected as green space. Up to 100 potential sites of over 0.25ha have been identified through this process, and will be considered and assessed further as part of the wider ‘pool’ of sites undergoing detailed site assessment (as explained further in paragraphs 21 – 28 of this report).
- **Green Belt Review:** At this stage no decisions have been taken about whether or not the Plan will look to release land from the Green Belt in order to meet development needs, though this will be an option that is presented as part of the consultation. In order to help inform this decision, a strategic review of the Green Belt in Leeds is being undertaken. This is looking at broad ‘parcels’ of land surrounding settlements (not individual sites) and considering the extent to which they serve the five purposes of the Green Belt set out in the National Planning Policy Framework (NPPF).
- **Minerals Needs Assessment:** This work is ongoing, though given the overall balance in supply of minerals at the regional level, it is not anticipated that it will identify significant additional requirements for mineral extraction to take place in Leeds (above and beyond what is already consented or planned).
- **Waste Needs Assessment:** This work is ongoing, though following the development of the Leeds Recycling and Energy Recovery Facility (RERF) and Skelton Grange Energy

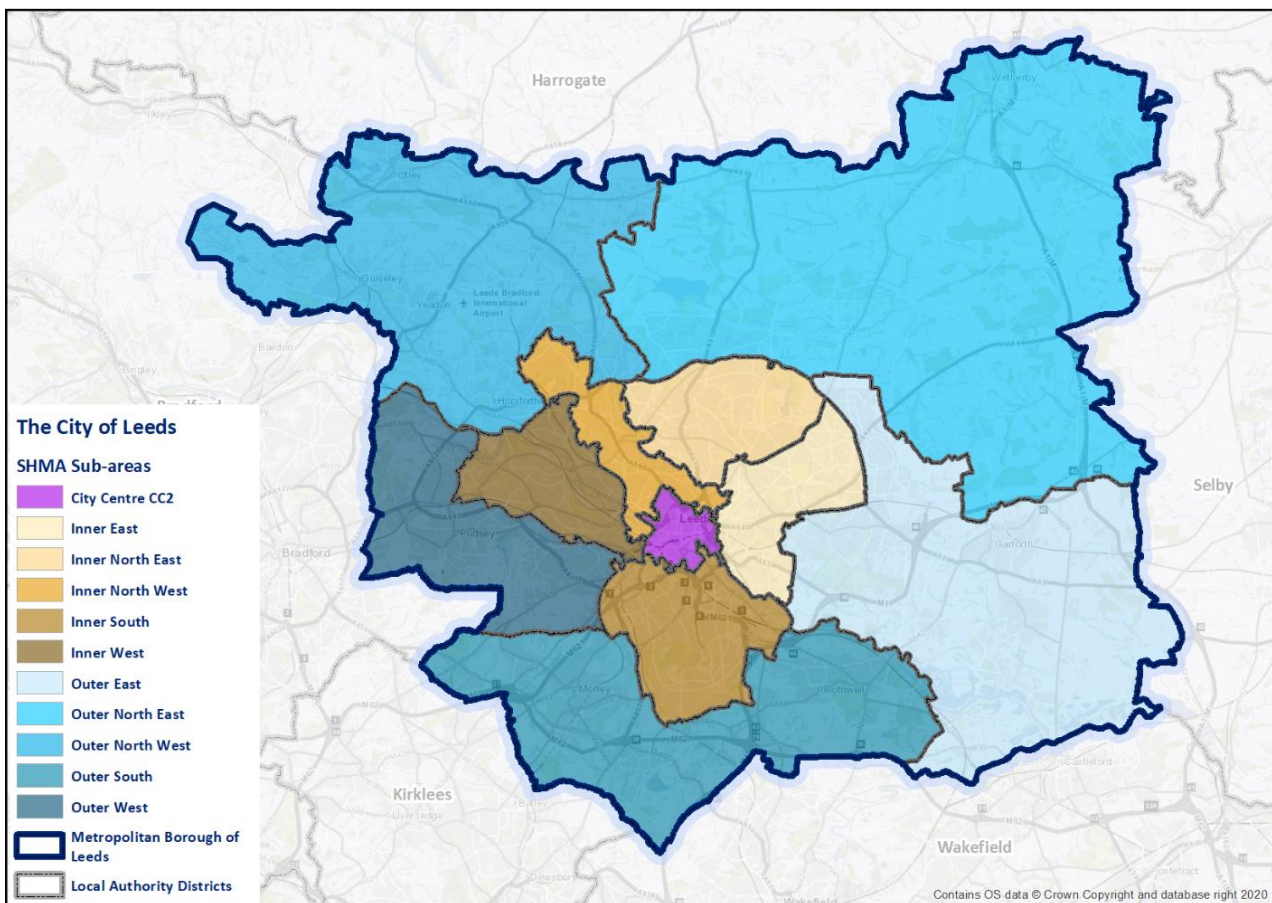
from Waste Facility it is expected that the overall needs for new waste management / processing facilities over the next plan period is likely to be smaller scale, and focussed on specific waste streams such as glass recycling and green waste composting.

- **Infrastructure Study:** This study is focussed on the infrastructure needs arising from new development across Leeds. The first phase of the study focuses on the capacity of existing infrastructure, with later phases (to be completed once decisions have been made about the overall spatial strategy and locations of proposed allocations) to look in further detail at what infrastructure will need to be delivered alongside this development, and the mechanisms for securing this.
- **Sustainability Appraisal:** The sustainability appraisal is an integral part of the preparation of the Local Plan. It appraises the social, environmental and economic effects of the Plan at each stage of the process, helping to ensure that decisions are made that contribute to achieving sustainable development. An appraisal is being undertaken of all of the options presented for consultation, including those relating to proposed policies as well as potential sites.

15 Work on many of these studies is still ongoing, and it is intended that they will be published as part of the next consultation. Alongside this, work is also ongoing to consider the implications of the findings of these studies in terms of both the issues that the Plan needs to address, and the different options for doing so.

#### Taking an area-based approach to planning to meet housing needs across Leeds

- 16 Leeds is a large and diverse metropolitan authority with a variety of communities ranging from small rural settlements to suburban estates and inner-city high-density areas with an active city centre. Therefore, when planning for housing, it is necessary to break down the overall district-wide requirement to smaller areas as it:
- a) helps to reflect the complexity of Leeds as district that is made up of a variety of different places, each with different needs and opportunities for and from development;
  - b) gives more clarity to communities about how much residential development is likely to take place in their area; and
  - c) ensures there is alignment between local needs for development and the allocation of sites.
- 17 To enable the Plan to be based on a thorough understanding of how local needs for housing vary across different parts of the City, and focus more specifically on individual places, the SHMA has been prepared on a 'bottom up' basis that breaks needs down to lower super output level. This means that it is able to provide localised evidence of specific needs in different parts of the City, though (to ensure that the findings of the study are easy to understand) the majority of data is present at an area level. These areas are based on the 'community committee' areas used by the Council for other purposes, which group together wards into a series of broader areas. However, the City Centre will form its own area, because the types of development that are needed in the City Centre may be different to other parts of the inner city. The areas are shown on the plan below:



18 These 11 areas are used as a starting point for planning for housing development that meets local needs in different parts of the City. This will help enable the plan to focus more specifically on the needs of individual areas and ensure that the opportunities that it presents to protect, enhance and celebrate local distinctiveness across all of the communities in Leeds are reflected through the policies of the Plan.

19 These areas will not be used for the purposes of distributing an overall target to meet housing needs in the same way that Housing Market Characteristic Areas were used in the previous Site Allocations Plan. Instead, they allow for a 'bottom up' approach to understanding what the needs are in different parts of the district, and for considering how these can be best addressed through the Plan.

20 It is recognised that each area will have strong links and relationships with other places nearby. As such, they can only be a starting point for considering the different needs, opportunities and challenges in different areas that the Plan will need to respond to.

Approach to considering and assessing specific sites

21 The Plan will need to earmark specific sites for development in order to meet the development needs identified. However, it will not need to 'start from scratch' in order to do this, as a number of sites exist that are already identified as suitable for development. This includes undeveloped sites that have:

- a) been allocated for development in the Aire Valley AAP or Site Allocations Plan; and
- b) recently been granted planning permissions (in the last 3 years, or where there is evidence of recent progress towards building the site).

22 LLP2040 will not revisit the decisions made on these sites unless the landowner has put forward an alternative proposal (e.g. is now proposing housing on a site that currently has permission for employment development). The capacity expected to be delivered by these sites over the Plan period will be reviewed and taken into account when determining how much additional land needs to be identified.

23 Sites with older (or expired) planning permission and undeveloped allocations from the previous Unitary Development Plan (UDP) will, however, need to be reassessed to ensure that they are still suitable and deliverable. They will be considered alongside (and using the same site assessment methodology) as sites suggested by developers, landowners and the public through the 'Call for Sites' or 'Strategic Housing Land Availability Assessment', and sites in the urban area that have been identified by the Council through the 'Urban Capacity Study'. Together, these form a pool of sites that need to be considered as potential options for allocation in the Plan.

24 In total, the capacity of all of these potential sites far exceeds the amount of land that is required to meet needs. This means that the Plan will be able to make choices about which should be allocated.

25 In order to inform future decisions about which sites are most suitable for development, a 'site assessment methodology' has been established. This is being used to assess all sites, on a consistent basis, against 37 indicators that are relevant to how suitable (or otherwise) they might be for development. This includes factors such as:

Relationship to settlements	Biodiversity & geodiversity	Flood Risk
Heritage	Woodland and trees	Green belt
Greenfield or brownfield land	Accessibility	Landscape character
Air quality	Agricultural land value	Compatibility with neighbouring uses
Contaminated land	Minerals resources	Renewable and low carbon energy
Green space	Non-road transport network	Regeneration or economic benefits
Town centre vitality & viability	Community facilities	Green & blue infrastructure
Waste processing facilities	Land instability	

26 For each indicator, sites will be given a score of between +3 and -3 in accordance with clear and consistent scoring criteria. These can then be totalled to give an overall score for a site, though it is worth noting that a significant negative against one indicator may, on its own, mean that a site is unsuitable even if it scores well against other indicators e.g. if a site lies within a flood risk zone.

27 It is intended that a map of all of the sites that have been assessed and the results of their initial assessment will be published as part of the Issues and Options consultation in order to:

- enable those with an interest in a site to 'fact-check' the initial assessment to ensure that all relevant information has been taken into account;
- allow local communities to share their views and preferences about potential sites; and
- provide an opportunity for landowners and developers to put forward proposals to improve their sites e.g. through layout, provision of accompanying infrastructure or delivery of wider plan benefits e.g. affordable housing.

28 At this stage in the plan making process, no decisions have been made about which sites are preferred. The responses to the consultation, and any amendments made to sites and/or scores, will be used to help determine which sites are the most appropriate for allocation (and this will be subject to further consultation before the Plan is submitted for approval).

### Next steps

29 Over the coming months, we will continue to develop and refine the evidence base needed to underpin the Plan. This will be used to define the key 'issues' and 'options' for the Plan, and preparing material that explains this in a manner that can be easily understood by anyone with an interest in the future strategy for development in Leeds.

- 30 Recognising the Council's ambition for Leeds to be a 'child friendly city', significant work is currently ongoing to engage with school children about their aspirations for the City. Workshops for year 6 children are being held in 15 schools across the City (involving around 650 children in total) to understand their views about how we should plan for new development. This activity is taking place now as early discussions with schools indicated that the pre-summer holiday period would be the best time for these workshops to be accommodated and most fruitful. In addition, it will enable the outcomes of these sessions to be fed into the Plan prior to consultation.
- 31 A consultation strategy for the next public consultation is being developed. This will look at how material will be presented (and how new digital tools can be used to make the information as engaging as possible), as well as what events are planned as part of the consultation in order to raise awareness of the Plan, and enable people to speak to officers about what is all about. As part of this, careful consideration will need to be made of how best use can be made of resources, recognising the ongoing challenges that the Council faces with its budget and the need to spend money wisely.
- 32 It is proposed that a series of Ward Member briefings will be held. This is to ensure that Members across the City are aware of the Plan, understand what the upcoming consultation means for the parts of the City they represent, and how they can advise, support and promote the consultation. These will be held during in due course with presentation material being tailored to the area in question.
- 33 Development Plan Panel will then consider the consultation material in two stages. It is proposed that at the September meeting, details of evidence base outputs and proposed options for the Plan will be considered. It is proposed that in November, members will consider the consultation material itself, prior to it being considered by Executive Board and (subject to approval) being published for public consultation before the end of the year.

### **What impact will this proposal have?**

- 34 Once adopted, the LLP2040 will guide development decisions through the determination of planning applications and also set a framework within which Neighbourhood Plans may be developed and updated. It will provide clarity for local people and investors on how Leeds is proposed to change up to 2040 and defend against inappropriate speculative development that is not supported in the Plan. It is important to ensure that local communities, and the development industry, are engaged in the process of preparing the Plan and that the Plan is underpinned by robust evidence. This report outlines the progress that has been made on the Plan since the last public consultation, and how it will be used to help shape the next consultation on the issues and options for the Plan.

### **How does this proposal impact the three pillars of the Best City Ambition?**

Health and Wellbeing

Inclusive Growth

Zero Carbon

- 35 There is a clear cross-cutting role for planning in delivering against all of the Council's pillars as established through the Best City Ambition. This includes;
- 36 Zero Carbon – the existing spatial strategy for Leeds is based on the principles of reducing the need to travel (and enabling opportunities for the use of sustainable modes of transport) and maximising brownfield land and these principles will be reinforced and updated through the LLP2040 including by supporting the development of low-carbon transport networks, addressing the challenges of housing quality, and creating vibrant places where residents have close access to services and amenities. It will also promote the sustainable use of resources, and the sustainable movement of materials;



- 37 Health and Wellbeing – using planning policies to enable better and more equal access to essential health and learning services by directing development to locations where housing, jobs, services and facilities are most accessible by active travel (including by walking and cycling). Through the LLP2040 new high quality housing will be planned so that everyone can have a home that support good health, wellbeing and educational outcomes. It will consider connections between developments and green spaces, and secure the delivery of new or enhanced green space as part of housing development, recognising it's importance in supporting active lifestyles and mental health. The Plan will also have an important role in ensuring waste is appropriately managed to support health and wellbeing for all parts of the City;
- 38 Inclusive Growth – updating planning policies for to support Leeds as an outward looking global city where the benefits of housing (especially affordable housing) and economic growth are distributed fairly and there are opportunities for all. The LLP2040 will support the role of the centres across Leeds, and ensure that sufficient land and minerals are available to support the growth of the City so as to maximise the potential to deliver a wide range of jobs across that are accessible and available to all. It will also recognise the importance of place and that positive identity culture, heritage and pride in our communities are vital assets which need to be protected and enhanced through new developments.

### **What consultation and engagement has taken place?**

Wards affected: ALL

Have ward members been consulted?       Yes  No

- 39 As outlined above, the plan-making process embeds consultation and engagement at each key stage. Consultation on the scope of the Plan was undertaken between February and March 2023, and it is intended that further public consultation is taken on the issues and options for the Plan in late 2024. Feeding into this, a series of workshops are currently being undertaken with year 6 children in schools across Leeds to ensure that the views of children, specifically, are taken into account (reflecting that increasing consultation and engagement by young people is a key target of the Statement of Community Involvement).

### **What are the resource implications?**

- 40 The preparation of LLP2040 and accompanying evidence base is a resource intensive endeavour which incurs additional cost, in terms of both evidence base preparation and consultation, at a time of increased budget pressure. In general, costs will be met from within existing budgets and consultation will be carried out in a manner which makes best use of low-cost technological options whilst ensuring that local people have an opportunity to engage with planners at face-to-face events. This recognises that, by working with communities, we may reduce delays (and costs) associated with objections and challenges to the Plan.

### **What are the key risks and how are they being managed?**

- 41 It is recognised that there are risks to pursuing updates to the Local Plan. The planning system has been subject to considerable legislative and policy changes in recent years and the new Labour Government has proposed further change. This is likely to lead to reforms being made as LLP2040 is being prepared which will need to be considered. However, with Local Plans continuing to be recognised as having a very important role in addressing the housing crisis it is necessary to progress the Plan rather than awaiting full details of proposed changes. Given the

Plan remains at an early stage in the plan-making process there should be opportunities to adapt the Plan, as necessary, when further clarity emerges.

42 Development viability also presents a potential risk to LLP 2040. Evidence identifies that at the strategic level existing and proposed policies are, as a whole, viable, but within a challenging international economic picture with high costs of development remaining a significant factor in what planning burdens can be added. To that end, it is acknowledged that there is an increased imperative to look for creative solutions through LLP2040 in order to deliver its vision without introducing significant additional costs that render development unviable. Wider economic conditions will need to be kept under review as the Plan is developed, and reflected within viability evidence, in order to understand any implications that they have for development viability across Leeds.

43 The breadth of the scope of LLP 2040 also presents a potential risk to timely progress, as a wide range of policy areas are proposed for inclusion as part of the update. Whilst there are issues around the management of resources, there are also risks that a single issue may slow down progress on all issues, which will need to be managed.

44 Many of the topic areas identified in the proposed scope LLP 2040 have links with wider corporate risks identified in the Council's Corporate Risk Map and Annual Corporate Risk Report 2022. This includes the risks of insufficient housing growth, insufficient school places, climate change, community cohesion, escalating poverty, economic growth lag increasing inequality and transport issues: keeping the city moving. The Plan will have an important role in helping to manage some of these risks (including by ensuring sufficient land is available to support housing and economic growth, the provision of affordable housing to meet local needs, and considering the accessibility and transport implications of development proposals), and will also need to ensure it is responsive to the wider challenges facing Leeds.

### **What are the legal implications?**

45 The preparation of LLP 2040 as a development plan document is in compliance with the provisions of the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

## **Options, timescales and measuring success**

### **What other options were considered?**

46 This report provides a general update on progress with LLP2040 so has not been subject to a wider appraisal of options. However, with regard to the future policies of the Plan, consideration is being given to all reasonable options at this stage. These will be refined into preferred options at a later stage in the plan preparation process.

### **How will success be measured?**

47 Monitoring indicators for each new planning policy included in LLP 2040 will be developed as part of the policy development process. Success will be monitored as part of the Annual Monitoring Report.

48 Targets for consultation are established through the Statement of Consultation, such as receiving responses from every ward in Leeds, and these will be reflected and monitored as part of the LLP2040 Report of Consultation.

### **What is the timetable and who will be responsible for implementation?**

49 With regards to the overall timescales for the LLP 2040, there are a number of steps to producing or updating a Local Plan. For LLP2040 we are proposing that there will be five key stages:

- *Scoping* – the current stage where we seek views about what the plan will address and what it should aim to achieve
- *Issues and Options* – where we carefully consider the comments made alongside evidence that we have developed, to identify the issues that the Plan needs to address and what the options for doing this are (the current stage).
- *Publication* – where, taking into account comments, we draft detailed policies which specify what will be expected from developments.
- *Submission* - where it is ensured that the final draft policies are considered sound and legal before submitting the Plan to the Secretary of State for independent examination by a Planning Inspector.
- *Adoption* – where, following independent examination (and any proposed modifications), the Council receives an Inspector’s Report and can formally adopt the policies as part of the statutory Local Plan.

50 It is intended that further reports will be brought to Development Plan Panel in due course, with fuller details of the evidence and proposed options for the Plan. This will be followed by a report in November with the consultation material itself, prior to it being considered by Executive Board and (subject to approval) being published for public consultation.

## **Appendices**

- n/a

## **Background papers**

- n/a