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## DEVELOPMENT PLAN PANEL

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Meeting to be held in Civic Hall, Leeds, LS1 1UR on  
Tuesday, 5th November, 2024  
at 1.30 pm

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### MEMBERSHIP

#### Councillors

J Akhtar  
B Anderson  
C Campbell  
P Carlill  
R Finnigan  
J Garvani (Chair)  
J Lennox  
J Pryor  
J Heselwood  
A Lamb  
P Wray

# A G E N D A

Item No	Ward	Item Not Open		Page No
1			<p><b>APPEALS AGAINST REFUSAL OF INSPECTION OF DOCUMENTS</b></p> <p>To consider any appeals in accordance with Procedure Rule 15.2 of the Access to Information Rules (in the event of an Appeal the press and public will be excluded)</p> <p>(*In accordance with Procedure Rule 15.2, written notice of an appeal must be received by the Head of Governance Services at least 24 hours before the meeting)</p>	
2			<p><b>EXEMPT INFORMATION - POSSIBLE EXCLUSION OF THE PRESS AND PUBLIC</b></p> <p>1 To highlight reports or appendices which officers have identified as containing exempt information, and where officers consider that the public interest in maintaining the exemption outweighs the public interest in disclosing the information, for the reasons outlined in the report.</p> <p>2 To consider whether or not to accept the officers recommendation in respect of the above information.</p> <p>3 If so, to formally pass the following resolution:-</p> <p><b>RESOLVED –</b> That the press and public be excluded from the meeting during consideration of the following parts of the agenda designated as containing exempt information on the grounds that it is likely, in view of the nature of the business to be transacted or the nature of the proceedings, that if members of the press and public were present there would be disclosure to them of exempt information, as follows:</p>	

Item No	Ward	Item Not Open		Page No
3			<p><b>LATE ITEMS</b></p> <p>To identify items which have been admitted to the agenda by the Chair for consideration.</p> <p>(The special circumstance shall be specified in the minutes).</p>	
4			<p><b>DECLARATION OF INTERESTS</b></p> <p>To disclose or draw attention to any interests in accordance with Leeds City Council's 'Councillor Code of Conduct'.</p>	
5			<p><b>APOLOGIES FOR ABSENCE</b></p> <p>To receive any apologies for absence and notification of substitutes.</p>	
6			<p><b>MINUTES</b></p> <p>To receive and consider the attached minutes of the previous meeting held on the 17<sup>th</sup> of September 2024.</p>	7 - 14
7			<p><b>LEEDS LOCAL PLAN 2040 UPDATE</b></p> <p>The report of the Chief Planning Officer provides a progress update for Leeds Local Plan 2040 (LLP2040). LLP2040 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 as part of a 'Plan-led' system, as well as setting standards and criteria against which planning applications can be assessed. This paper provides an update on the work undertaken so far for each of the topic areas as well as the next steps leading up to consultation on the 'issues' and 'options' for the Plan.</p>	15 - 34
8			<p><b>DATE AND TIME OF NEXT MEETING</b></p> <p>To note the date and time of the next meeting as the 28<sup>th</sup> of January 2025 at 1:30pm.</p>	

Item No	Ward	Item Not Open		Page No
			<p><b><u>Third Party Recording</u></b></p> <p>Recording of this meeting is allowed to enable those not present to see or hear the proceedings either as they take place (or later) and to enable the reporting of those proceedings. A copy of the recording protocol is available from the contacts named on the front of this agenda.</p> <p>Use of Recordings by Third Parties– code of practice</p> <ul style="list-style-type: none"> <li>a) Any published recording should be accompanied by a statement of when and where the recording was made, the context of the discussion that took place, and a clear identification of the main speakers and their role or title.</li> <li>b) Those making recordings must not edit the recording in a way that could lead to misinterpretation or misrepresentation of the proceedings or comments made by attendees. In particular there should be no internal editing of published extracts; recordings may start at any point and end at any point but the material between those points must be complete.</li> </ul> <p>We strive to ensure our public committee meetings are inclusive and accessible for all. If you are intending to observe a public meeting in-person, please advise us in advance of any specific access requirements that we need to take into account by email (<a href="mailto:FacilitiesManagement@leeds.gov.uk">FacilitiesManagement@leeds.gov.uk</a>). Please state the name, date and start time of the committee meeting you will be observing and include your full name and contact details.</p>	

## Development Plan Panel

Tuesday, 17th September, 2024

**PRESENT:** Councillor J Garvani in the Chair

Councillors J Akhtar, B Anderson,  
C Campbell, P Carlill, J Lennox, J Pryor,  
J Heselwood, A Lamb and P Wray

### **11 Appeals Against Refusal of Inspection of Documents**

There were no appeals.

### **12 Exempt Information - Possible Exclusion of the Press and Public**

There were no exempt items.

### **13 Late Items**

There were no late items.

### **14 Declaration of Interests**

Members did not declare any interests at the meeting.

### **15 Apologies for Absence**

Apologies for absence were received from Councillor R Finnigan.

### **16 Minutes**

**RESOLVED-** That the minutes of the Development Plan Panel meeting held on the 16<sup>th</sup> of July 2024 be approved as an accurate record.

### **17 Matters Arising**

Minute 7 – As it had been agreed at the previous meeting that the Chair of the Panel was to write to the Planning Minister to request clarity as to how the Written Ministerial Statement would impact local planning policy and the Government's overall approach to planning policy, it was noted that this letter had not been sent in light of the proposed reforms to the NPPF and wider planning system with the need to review proposals for further information.

### **18 Consultation Response to Proposed Reforms to the NPPF and Other Changes to the Planning System**

The report of the Chief Planning Officer outlined that on the 30<sup>th</sup> of July 2024 the Government launched an 8-week consultation on proposed changes to the National Planning Policy Framework (NPPF) and a series of wider national planning policy reforms. The report summarised the key proposed changes as part of this consultation, such as a new standard method for calculating Local Authority housing requirements and, in conjunction with Appendix 1, highlighted the proposed Council response, collated in conjunction with a range of Council departments.

The Group Manager for Policy and Plans presented the report, providing Members with the following information:

- On the 30<sup>th</sup> of July 2024, the Government had published a proposal detailing revisions to the NPPF and wider planning reforms, alongside a consultation on its contents, with responses due by the 24<sup>th</sup> of September 2024. Appendix 1 outlined the draft response, which was to be reviewed, subject to Members comments, and submitted by the Chief Planning Officer, in consultation with the Executive Member for Economy, Transport and Sustainable Development.
- The key changes proposed by the reforms were highlighted as the revised approach to calculating housing numbers and new policy for green and grey belt land.
- Housing number reforms proposed that Local Authorities were to make best efforts to allocate land to meet the needs of housing targets using new methodology for calculating overall housing stock and an affordability multiplier which generated a figure for Leeds as 4,159 new housing units per annum.
- The new calculated housing number raised challenges given that in previous years housing number targets had not been met and also had implications on the development of new local planning policies, including Leeds Local Plan 2040 (LLP2040).
- Leeds held an excess of the 5 year land supply requirement, however, this was to be reduced by the new housing number target but would still remain as an excess.
- Paragraph 10 of the report noted that the draft response supported a number of measures proposed by the reform, but concerns regarding deliverability were raised as it was developers, and not planning authorities that built housing units. The onus should be on developers to deliver housing, where sound policy and permissions were in place in order to not create additional pressures on land release and a risk in public trust, undermining local plan making, was outlined.
- The draft response also noted that greater weight should be given to affordable housing numbers given that affordability was a major element of the of new calculation method.
- The proposed reforms noted a clear requirement for housing needs to be considered an exceptional circumstance for land release from green belt. A green belt review was being undertaken alongside LLP2040.
- A new definition for grey belt land had been provided as any land within green belt that had been previously developed or that make limited contribution to the five purposes of green belt. These measures weakened protection of green belt against the interest of housing provision and other development.
- Concerns for the decision making process supporting development of green belt land were raised in the draft response as allowances were made outside of the plan making process.
- Paragraph 17 of the report detailed other changes proposed by the reforms, with the draft response supporting the affordable housing changes, removal of the term beauty, renewable energy, highways, previously developed land, planning fees, duty to co-operate and broad design measures.
- Further information was requested for economic development, infrastructure levy changes, renewable energy, energy efficiency and reviewing or revoking the Written Ministerial Statement, as part of the draft response.

Members discussed the following key matters:

- As the reforms were understood to create pressures on the functions of green belt land, an approach to prioritise higher value green belt or in areas where its overall size was limited was needed. In response it was outlined that national policy did not add weight to any of the five purposes of green belt over one another, but where limited green belt was available, the function of preventing settlements from merging was significantly weighted.
- The green belt review was an appropriate vehicle for identifying higher value green belt land where larger segments could be grouped and then assessed against the five purposes, to inform suitable site allocation. Prior to the release of green belt, other sources of land were to be satisfied first, however, green belt was performing a spatial function within the context of the five purposes and a strategic, consistent approach was needed to determine land supply against character and function.
- It was outlined that the Conservative Group were submitting their own response to the NPPF reforms.
- There was concern expressed for the additional pressures the reforms placed on Local Authorities to increase housing numbers, whereas there was limited influence over developers carrying out planning permissions within quicker time frames. The reforms reflected a need for an increase in houses built but required greater focus on affordability and there was a risk in releasing additional land without increasing housing delivery or whole system change as the planning system was only one part of the solution.
- A greater enforcement model was needed to bring planning permissions into fruition and in addition, the idea that building more houses would decrease house prices was limited by an often fixed market approach on developer profit margins.
- The proposed national methodology for determining housing numbers was supported as a broad principle but there was some confusion as to how local planning policies were to hold up the methodology in principle, alongside land supply capacity and the housing target within the core strategy now being 5 years old. There was some ability to dispute NPPF housing numbers using specific exemptions.
- Clearer definitions for green belt exemptions and grey belt land were requested as the increased housing number targets created significant pressure on land supply. Previous definitions and exemptions had been vague to allow decision maker discrepancy, but the reforms provided a measure for release to meet housing needs.
- Mandatory national targets for affordable housing for all sites was required in order for public needs to be met. Current material considerations of viability were often barriers to widespread affordable housing provision.
- A well considered review was needed to create a sound approach to infrastructure levy's and associated CIL contributions, to ensure enough infrastructure was in place to support new developments.
- It was suggested that the response needed to be bolder in order to be clear what policies and processes Local Authorities needed to support the delivery of high quality development. It had been too common for viability to be a major material consideration for decision making bodies and greater weight should be available to local needs in policy terms.

- Reflecting on the housing affordability crisis, the ability for Local Authorities to inform the percentage of affordable houses required, as well as the focus on social rent levels were supported. The draft response, alongside partnership working with Homes England, provided a welcome opportunity to provide a meaningful impact on tackling the housing crisis and any additional mechanisms available to increase truly affordable housing was essential.
- The removal of first homes requirement from the NPPF was supported as this approach did not address the reality of housing needs.
- Methods for enforcing the implementation of planning permissions were discussed, including a suggestion regarding reducing the timeframes offered to developers.
- Members supported the response for the approach to energy efficiency and associated targets.
- The definition of affordable housing was required to be reviewed in order to provide truly affordable housing across all areas. An arbitrary rent reduction was not enough for meeting needs and addressing the housing crisis.

**RESOLVED** –That the contents of the report and Appendix 1, along with Members comments on the proposed response to the National Planning Policy Framework consultation, prior to the Chief Planning Officer submitting these in consultation with the Executive Member for Economy, Transport and Sustainable Development, be noted.

## **19 Housing Need and Supply Update**

The report of the Chief Planning Officer provided an update regarding that the Council’s planning service maintains up to date evidence on housing needs mainly for the purposes of plan-making and also needs to maintain information on a 5-year housing land supply to ensure that there is sufficient land to meet those needs across the city.

The Principal Planner from City Development, presented the report, providing Members with the following information:

- This item was an update on the progress of the Strategic Housing Market Assessment (SHMA) which maintains up to date evidence on housing needs mainly for the purposes of plan-making and also information on the need to maintain a 5-year housing land supply to ensure that there is sufficient land to meet those needs across the city.
- The previous iteration of the SHMA had been conducted in 2017, prior to the Core Strategy being developed in 2019. The new SHMA was developed in partnership with consultants Arc4 and Edge Analytics.
- Government methodology, as part of the NPPF reforms, for determining housing number requirements had changed, with an updated approach to size, type, location and tenure of housing development needs.
- A wide scope of consultation had been run, including 100 stakeholders, a public consultation and a steering group.
- An update on the following headline finding on the SHMA were outlined as:
  - *Overall Housing Requirements* - The requirement figure for housing using the Government’s standard method forecast the need of a 35% urban uplift. The overall housing requirement in the SHMA was a 3,022



average each year and 4,080 per annum including the uplift. this data informed planning and allocation which translates to delivery.

- *Affordable Housing Need* – A significant uplift in affordable housing provision was required, with the calculations determining the net shortfall as 2,136 per annum, based against the previous 10 year backlog, over 900 new affordable homes were required per annum. This was reflective of the Council Housing waiting list, housing benefit levels and the cost of living crisis leading to significant demand despite best efforts.
- *Housing Mix* – The current policy position was considered to have a narrow focus looking only at the number of bedrooms city wide; a more detailed model was in preparation to consider size, type and tenure across 11 sub areas as part of LLP2040.
- *Student Accommodation* – Demand and supply had changed, with a stark increase in the number of student housing developments, which was outlined as part of the Unipol report at appendix 2. There was a shift away from the previous standard of co-living models to self contained units more concentrated within the city centre. These housing models largely catered for international students and postgraduates, with a decrease in demand forecast. The Council had approved over 17,000 bed spaces since 2017, with 7,500 over the past 2 years.
- *Older Persons Housing* – There was a need for this housing type with a calculation for 8,805 new older persons units by 2040 calculated, as C3 class houses and extra care home bed spaces to support various needs.
- *Specialist Housing Needs* – This housing type was to support various health and life experience needs, with a shift away from understanding this as age related. The exact needs requirements were difficult to scope but available data was to inform plans.
- The reforms to the NPPF had implications in regard to the update to the standard method of the stock-based approach, with an increased affordability multiplier and the need to increase housing land supply. The new calculation outlined a target of 4,159 new houses per annum and an addendum to the SHMA was anticipated by the end of 2024 to set out the response to the reforms.
- The Core Strategy was 5 years old, and the housing target was replaced by the Government standard method with the 35% uplift now applied. This impacted the 5 year land supply position, reduced from 7.7 years to between 6.1 and 6.4 years.
- The next steps were outlined as the SHMA being published and used as an evidence base for LLP2040, becoming a material consideration as well as an updated 5 year land supply position to be calculated as part of the Strategic Housing Land Availability Assessment (SHLAA) in 2024.

Members discussed the following key matters:

- There was a need to build more affordable student accommodation as current provision incurred substantial costs to students and was considered to contribute to an unfair system. High cost rent had also impacted other areas, with HMO's previously occupied by co-living students being occupied by

young professionals. This was a clear issue outlined by the evidence and a policy response was required.

- As the demographic of residents within the city centre had changed, well thought out policy was needed to respond to needs, including family friendly developments. The evidence gathered by the SHMA was more nuanced in terms of bedroom numbers and property size to inform policy development to compliment the amenities and services within the city centre, which were noted to be good for all demographics.
- It was confirmed that the housing income and cost data was based on a 2022 data set from the original commission of the SHMA. Consideration as to what up to date data would reflect was noted given further inflation and wage stagnation; policy needed to focus on meaningful affordability to combat the housing crisis.
- As less than 1% of dwellings within the city centre contained three bedrooms, policy needed to encourage more affordable and diverse housing options. Demand had changed for city centre housing and options for new development locations to meet needs were ongoing.
- The issue of affordability was to be understood via the lens of housing cost but also wage level and wider societal and economic change was integral to address the housing crisis, outside of the planning system.
- If targets were continually missed back claiming shortfalls was somewhat ineffective. It was noted that the new Government methodology reflected wage levels against house prices across different areas to determine targets and the SHMA considered net arising needs and contribution to back logs.
- Effectively increasing the variety of housing options was going to be through stronger, enforceable policy positions and the SHMA was a good evidence base to inform policy to cater to local needs.
- The economic benefits for purpose built student accommodation and the affluent individuals it brought to the city was recognised, whilst understanding the issue of affordable student accommodation as difficult given traditional student areas had become mixed or displaced and decent living condition were expected but not always provided.
- Cluster models for student housing was often more affordable and Members noted that young people should not be priced out of taking further education; it was important to get suitable housing and space standards for this type of housing.
- The issues of housing quality in HMOs and co-living models were mainly due to an increase in demand and competition for units.
- The Unipol report at appendix 2, and the student housing working group, were noted to be a useful source of data but were not bound to policy outcomes.
- The issues noted with purpose build student accommodation translated to supported living facilities within outer areas and resolutions were best sought through in depth understanding of wider communities specific to each area.
- A reduction in houses prices was outlined as undesirable to developers and also some house owners and increased wages was the best method for addressing the affordable housing crisis. Pre-reform methodology had not focused on need projections, whereas the revised approach was to consider location, size, and tenure across the eleven sub areas, being mindful of existing capacity to translate into need and land allocation plans.

- How housing need balanced against demand was queried, given affordable housing was required across all areas to support the economy and different job types.
- Although evidence for specialist needs housing and support living models for people aged 18 to 64 was difficult to scope, the need for supported living options should be captured in forthcoming policy, which would alleviate pressure on SEND provision. It was noted that approaches were being considered, including conditions which could be added to planning permissions and the SHMA identified gaps which required further research.
- The figures detailed on the number of people across all age groups with learning disabilities in table 4.13 at page 145 of the report were agreed to be checked again with the Adults Health and Social Care department and the relevant steering group, prior to publication. It was noted that delays in young people receiving Education, Health and Care Plans (EHCP) assessments and diagnosis impacted data that was required to scope needs.
- Whether reductions in affordable housing, for example through instances of right to buy, were taken into consideration as part of the housing need methodology and forthcoming policy considering the needs of sub areas, were queried. In response it was noted that affordable housing needs assessment as part of overall housing delivery considered remedying past effects of homelessness and waiting lists in order to maximise provision and reduce need and pressures from affordable homes.
- A balanced approach for the mix of housing option needs was to be maximised by policy and work with other services, including Regeneration assisted in delivery of affordable homes through specific providers as well as work to maximise the effects for Section 106 allocation.
- The 50% of affordable homes to be delivered on permissions for green belt land was also proposed by the reforms but viability issues may arise for developer delivery on other sites such as brown field and consideration of a realistic approach was to be considered.
- How in depth the data was for the sub areas was queried given that SHMA data was integral to neighbourhood plans; the SHMA had utilised data from the various output areas and from the Office of National Statistics to inform as required. Nuanced policy for each area's needs was required to get housing supply levels correct which were considered by LLP2040 including a settlement hierarchy. Agent summaries were useful data, but strategies required a multi factor input.
- House prices were relative and, although dependant on mortgage payments, a reduction in overall housing costs equated to more affordable housing.
- Retirement complexes were a good model between independent and supported living, however, these models were forthcoming through a market response, but Officers agreed to review the approach for this.
- It was confirmed that the removal of section 21 evictions had be considered during student housing working groups.
- Average income was confirmed to be determined through median data and utilised Leeds specific data.
- Granular neighbourhood data needed significant consideration as areas nearby, including different areas of the city centre, had a very different demographic make ups and micro economies.

- To address future projections for city centre, in particular student housing, it was noted that a mix of provision was needed and that the Universities could hold influence of affordability rates.

**RESOLVED** – That the report, along with Members comments be noted.

## **20 Update on Leeds Local Plan 2040**

The report of the Chief Planning Officer outlined that the Leeds Local Plan 2040 was earmarked to begin its second round of Regulation 18 public consultation in November 2024. A consultation on a revised National Planning Policy Framework (NPPF) was published at the end of July 2024. This proposed significant changes to national planning policy that will have a bearing on the Leeds Local Plan 2040. In light of this, it was proposed that the planned public consultation before the end of 2024 will instead happen in early 2025, pending finalisation of the NPPF.

The Group Manager from Policy and Plans, presented the report, providing Members with the following information:

- With the Government’s proposed NPPF and wider planning system consultation and reforms, there were tangible benefits and a reduction in risk for the ongoing development and adoption of LLP2040 in delaying the consultation.
- The next stage of consultation for LLP2040 had been paused in order for the impacts of the NPPF and wider reforms to be assessed in terms of the approach to the standard methodology for housing numbers, green and grey belt, employment land and affordable housing, among other topics.
- The LLP2040 consultation was paused in order for work not to be duplicated and to allow questions or concerns that were to be covered by NPPF reforms and its wider context for national and local planning policy to be addressed.
- In the interim period between recommencing the LLP2040 consultation work was ongoing work to research policy options such as site assessments and green belt review.
- The new timescales for the development and adoption of LLP2040 was noted to not be heavily impacted and could save time if a further round of consultation at a later stage could be avoided.
- An amended timetable was to be produced and was expected to be published early in the new year of 2025 after the new NPPF was published and available.

**RESOLVED** – That the report, along with Members comments be noted.

## **21 Date and Time of Next Meeting**

**RESOLVED** – To note the date and time of the next meeting the 5th of November 2024, at 1:30pm.

## Leeds Local Plan 2040 Update

Date: 5<sup>th</sup> November 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). LLP2040 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 as part of a 'Plan-led' system, as well as setting standards and criteria against which planning applications can be assessed. This paper provides an update on the work undertaken so far for each of the topic areas as well as the next steps leading up to consultation on the 'issues' and 'options' for the Plan.

### Recommendations

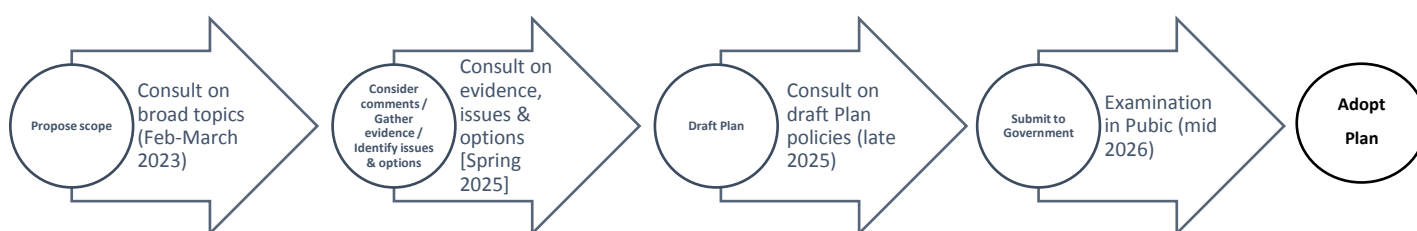
Development Plan Panel is requested to;

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

### What is this report about?

1. This report is an update on progress towards a Leeds Local Plan to 2040, with a plan period of between 2022 and 2040.
2. 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) mainly covering the period between 2012 and 2028:
  - Saved Unitary Development Plan (2006)
  - Natural Resources and Waste Local Plan (2013)
  - Aire Valley Leeds Area Action Plan (2017)
  - Leeds Core Strategy (amended 2019)
  - Site Allocations Plan (amended 2024)

3. Together, the Local Plan and the (current) 22 Neighbourhood Plans form the statutory Development Plan, which, alongside the National Planning Policy Framework (NPPF), forms the starting point in taking decisions on planning applications in Leeds, subject to other material considerations.
4. Local Planning Authorities are required<sup>1</sup> 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 where all 250 policies were considered. This identified a number of policies that require update / amendment arising from changes in evidence base, national or other local policy changes, or local circumstances since the adoption of these policies. It is recognised that further national planning reforms are underway (including updates to the NPPF) which will need to be reflected in the emerging Plan, as appropriate, as they come forward.
5. In response to this, the Local Plan for Leeds is being updated in two stages:
  - The Local Plan Update (“Your City, Your Neighbourhood, Your Planet”) sets policies for addressing the climate emergency (including carbon reduction, flood risk, green and blue infrastructure, place-making and sustainable infrastructure) and securing health and well-being improvements through planning. This targeted update is now at an advanced stage of development and due to be submitted to Government for examination early 2025.
  - The Leeds Local Plan 2040 will address all other policies relating to development up to 2040, including the overall strategy, scale and distribution of development, housing numbers, type and mix, economic development/inclusive growth, city and local centres, minerals, waste, transport and connectivity, and a range of other topics.
6. 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 (though if changes were to be made to the plan-making process as part of wider national planning reform, this may need to be reviewed);



## Main Issues

7. The Government wants to secure the highest sustained economic growth in the G7 with good jobs and productivity, making everyone in the country better off. The Government recognise that the planning system is central to this because different places play different roles in the national economy, partly determined by their attractiveness to investment and a place to locate highly skilled businesses and partly determined by local opportunities for sustainable growth. Leeds is centrally located in the UK and sits at the heart of the Leeds City Region. The Metropolitan District has seen significant recent economic growth within a broad-based economy, alongside a diverse local population, and market attractiveness to major institutions, key firms and global brands. The Council’s Inclusive Growth Strategy sets out a

<sup>1</sup> Town and Country Planning (Local Planning) (England) Regulations 2012 (amended)

direction for economic ambition in the City to capitalise on this position in ways that tackle poverty and help move towards a net zero economy.

8. The Government is clear through its recent consultation on draft changes to the National Planning Policy Framework that planning reform is needed to support its economic growth agenda and housing growth. The main issues that it will tackle immediately, as noted in its NPPF consultation, are set out in the table below alongside an understanding of where current and future planning policies are considering these issues.

<b>Draft 2024 NPPF ambitions</b>	<b>Local Plan Update</b>	<b>LLP2040</b>
Require local authorities to plan for their full housing needs and considering where new homes should be located, not whether to build them at all	-	✓
Support economic growth in key sectors	-	✓
Deliver more affordable and well-designed housing	✓	✓
Expect brownfield land to be the prime location for development and to increase densities to make best use of it	✓	✓
Review Green Belt policy so as to help support meeting local needs for development	-	✓
Deliver community needs to support society and the creation of healthy places	✓	✓
Support clean energy and the environment	✓	✓

9. In planning for economic growth Leeds has several drivers that frame a possible growth strategy for the District up to 2040. These include:
- a) A need to increase the number of homes that are delivered. The current plan seeks 3,247 homes per annum but both the previous and current Governments set out a national standard methodology which significantly increase this number to over 4,000 homes per annum. Government tells us that our focus should not be on whether we meet our housing needs, but how. It should be noted that the Council will not need to allocate all of its land requirements and can rely on sites already given planning permission and allocated but not yet developed – a stock of over 42,000 homes. The number of types of houses has increased in recent years with new entrants into the market delivering Build to Rent, Co-living and Private Extra-Care alongside traditional owner occupied homes, homes for older people and student housing.
  - b) A need to increase the number of affordable homes we deliver. Our Strategic Housing Market Assessment tells us that the proportion of homes that need to be affordable has almost doubled to over 2,000 homes per annum since 2017. This is reflective of the national picture, with a number of factors leading to an increased need for affordable housing.
  - c) A need to increase the amount of land available for employment. Leeds is an economic hub for the sub-region, the region and internationally. The Inclusive Growth strategy sets a framework for ‘good’ growth of relevant sectors which enables people to access a wider range of employment opportunities and the job market. Our own Employment Land Review tells us that we should be looking for a minimum of 400ha of commercial land up to 2040 (approximately the equivalent of 1,000 standard football pitches) and around 550,000 square metres (nearly 6 million square feet) of office space.

10. Concurrently, the District has challenges in its ability to deliver growth sustainably – that is growth which delivers economic, social and environmental benefits at the same time. These include:
- a) A need to reduce carbon emissions and plan for places that are resilient to climate change impacts,
  - b) A need to account for flood risk from the main rivers, secondary rivers and surface water run off,
  - c) The capacity of the District’s transport infrastructure i.e. its roads, rail lines, cycle routes, bus system and walkable routes; as these underpin the needs for people to move between homes, work, education and services,
  - d) The capacity of the District’s social infrastructure i.e. its schools, doctors, nurseries, hospitals, dentists, convenience stores, supermarkets, leisure facilities,
  - e) The circular economy, where we source the minerals needed to construct new development and how we deal with the waste generated.
11. Taking these factors into account, the Council has been gathering evidence and looking at the different ways in which the District might accommodate growth. This paper provides an update on that evidence base and the range of issues that are emerging. These are initial findings only at this stage and a full evidence base will be presented to residents, investors, stakeholders and developers in Spring 2025 for formal consultation.

### **Vision and Key Objectives**

12. The National Planning Policy Framework 2023 contains planning policies on a significant number of topics, that provide a starting point for considering what LLP2040 needs to achieve. As noted above, LLP2040 is the second part of the updates to the Local Plan, with the LPU establishing a series of core principles in relation to carbon reduction, flood risk, green and blue infrastructure, placemaking and sustainable infrastructure that will provide the ‘baseline’ for LLP2040. LLP2040 will take these principles forward into the future strategy for Leeds, ensuring that the Plan seeks to respond to the future development needs of the district in a way that is responsive to the climate emergency and delivers high quality sustainable growth. In order to provide direction and focus to the key ambitions of the Local Plan it is proposed that the spatial objectives of LLP2040 should be:
- a) **Affordable Housing:** enable more affordable homes to be built in the places that they are needed
  - b) **Local Communities:** support vibrant town and local centres, safeguard valued community facilities and green spaces, and support healthy and active lifestyles
  - c) **Culture and innovation:** Support culture and facilitate innovation across Leeds, including through the protection of important heritage and cultural assets
  - d) **Quality places:** Deliver high quality design and placemaking, with low carbon buildings, green spaces and public spaces that serve both children and adults and resilient to the effects of climate change.
  - e) **Leeds’ regional role:** Support and strengthen the role of Leeds as the centre of the West Yorkshire economy



- f) Meet identified needs: Ensure enough development land is available in the right places, and development is of the right type, to meet long term needs for employment growth, new homes, waste processing and minerals extraction.
- g) Support regeneration: Make the most of the potential that new development has to stimulate and support wider investment and regeneration and actively assist in promoting positive transformation of places with partners and funders.
- h) Infrastructure delivery: Ensure development is adequately supported by infrastructure, securing investment in new or improved social and physical infrastructure alongside development where required.
- i) Complete, compact and connected places: Align the delivery of new homes and jobs with transport investment, and focus development in places where sustainable and active travel is most feasible and where most people can walk or cycle to a range of local facilities
- j) Efficient use of land and resources: Prioritise the re-use of previously developed or underutilised land, secure an uplift in the density of development in sustainable locations, and use minerals resources wisely.
- k) Improved environment: Recognise the vital role of Green and Blue Infrastructure and ensure that development brings overall net benefits for biodiversity, including trees.

### **Emerging Growth Strategy**

13. Taking the above into account the key elements of an emerging growth strategy for LLP2040 would include the following issues and themes that will be consulted on in due course:

#### Urban intensification and development on previously developed land

14. Maximising previously developed land (PDL) or brownfield land has been the approach the Council has taken for the past 15 years. It has been very successful:
- a) 80% of all new homes being built on brownfield land
  - b) 40% of homes with planning permission are in the city centre
  - c) 69% of construction activity in the main urban area
15. Moreover, the District has witnessed an intensification of development on PDL with densities increasing above those initially estimated in the Core Strategy, as developers seek greater values from the same sites. Whilst densification was initially considered to be a planning tool to be used mainly in the City Centre, there has been an increasing recognition nationally in the NPPF, that in order to maximise finite reserves of land there is a need to build at greater densities in all areas and especially in locations which are the most sustainable i.e. have a greater access to local facilities and infrastructure (including public transport). This helps support measures to address the climate emergency, allows for a greater balance of wider land uses, such as food growing and renewable energy generation and provides critical mass for the most sustainable sites. This means that alongside a call for most housing sites to be gently densified, the most accessible sites or those that offer the best access to services can expect to see much higher density developments through LLP2040.
16. The Council has updated its Urban Capacity Study to identify opportunities for use of PDL, however the outputs reveal that that there will be insufficient PDL across the District to meet

all our housing needs. The evidence shows that there are not many derelict or vacant sites that the Council does not already know about through planning permissions or existing allocations. Up to 100 potential sites of over 0.25ha have been identified through this process, and their suitability and deliverability will be assessed further as part of the wider 'pool' of sites undergoing detailed site assessment (as detailed further below).

17. Development of underused buildings and land has seen an increase in recent years and these are likely to still arise as windfalls (i.e. development sites that are not possible to foresee), as the under-occupation of sites is difficult to pre-empt. Moreover, permitted development will continue to operate through change of use from other existing land uses to housing. Therefore, the Council is likely to maintain its historically high levels of windfall development, but there will be few new PDL sites that can be identified at the plan-making stage as part of the urban capacity study meaning that meeting housing needs will be mainly on existing sites that the Council knows about, planned transformation (such as in the City Centre, see below) or on greenfield sites. As part of the public consultation the Council will ask local people and landowners if there are any PDL sites that they are aware of that should come forward.
18. In order to improve neighbourhood quality and improve the vitality and viability of local and town centres LLP2040 survey evidence of the 62 local and town centres in the District has highlighted retail health and occupancy which will assist in clarifying the potential for further development, including housing and supporting infrastructure in our local and town centres.
19. It will be important for increased densities to be well-planned. This is something that policies within the Local Plan Update will set a framework for. Moreover, the progressing Design Code for the District will, among other things, set out clear guidance on appropriate scale and massing of tall buildings in particular areas alongside measures to use higher densities to support better place making e.g. the delivery of more on-site green space and biodiversity.
20. There are a number of additional challenges to delivering on previously developed land:
  - a) development in the City Centre isn't necessarily as diversified as it needs to be to meet local needs e.g. the delivery of affordable housing on high density sites is challenging due in part to the models of housing being delivered by the market and the constraints that distributing affordable homes across a private-rented sector scheme (such as a Build to Rent) brings for operators. Consideration will therefore need to be given on how more affordable housing can be delivered in different ways e.g. through use of Section 106 contributions or through use of land parcels (and other measures beyond the planning system). Moreover, development in the City Centre tends to be driven by 1 and 2 bedroom units whereas there is a longstanding desire to see more larger units to allow for families.
  - b) there has been a focus of student housing in city centre which does not currently deliver affordable housing and the LLP2040 will explore means of remedying this alongside direction on the type, location and mix of new student homes.
  - c) parts of the main urban area and City Centre fringe sites still suffer from relatively low market values compared to greenfield sites or sites in other parts of Leeds. This means that the value to be extracted from such sites is more limited and wider funding streams are needed to help stimulate significant sustainable growth in these areas.

## Infrastructure and new development

21. As well as meeting local housing needs, additional homes may bring new people to an area who create additional demand for infrastructure and services. The Government has said that they will develop a 10-year infrastructure strategy to support its economic growth plans. In the meantime, local planning authorities will need to understand the infrastructure implications of growth on existing facilities and services.
22. On transport. The Local Plan will align with the Connecting Leeds transport vision of how future residents are likely to travel and whether any improvements are required to the local transport network. Focusing development in areas where there is existing transport infrastructure that may be improved is the starting point to consider and this will help guide new development to the District's City Centre, major towns and their centres and local centres with existing services. The Council's planning and transport teams are working together to ascertain these needs and any necessary funding routes.
23. At the same time as LLP2040 progresses the West Yorkshire Combined Authority (WYCA) are taking forward proposals for a West Yorkshire Mass Rapid Transit system. A preliminary phase of public consultation was held during Summer 2024 and a second phase of informal public consultation will be undertaken in 2025. Following that, a business case for Mass Transit will be made to the Department for Transport and it is anticipated that a Transport and Works Act Order may follow, with a public inquiry expected. Construction of any new lines will begin after this process and progress through the late 2020s and early 2030s. This timetable overlaps with that of the plan period. Consequently, it will be important to take account of prospective future MRT lines and the potential that they may have. Within this overall context, it will be important to clarify the role that Mass Rapid Transit will make to individual sites, broad locations for growth, and clarify where and whether it will be a pre-requisite for development. WYCA have recently consulted on proposals that include a Leeds to White Rose line and a Leeds to Bradford line. Given this timing there will be a need for LLP2040 to take account of Mass Rapid Transit but not rely on it for its growth strategy. There is a need for spatial planning work to be done on approaches to transport corridor development that factor in the role of new transport hubs and stops, the role of town and local centres and nodes and the manner by which a transport corridor can develop into an economic growth corridor bringing wider investment benefits to local communities along the routes.
24. Homes also need water, energy, sewage, waste and broadband infrastructure. These are provided by utility companies and the Council will work with them throughout this process of the LLP2040 to ensure coordination. There are some barriers to development of such infrastructure in the right places at the right time and there is increasing pressure being placed on national agencies and utility companies to get the coordination right. It will be important for the plan as it develops to provide clarity and certainty to developers and investors so that they can carry the risk of investment in infrastructure at the earliest opportunity.
25. Finally, homes place demands on existing health, education and other local services. The Council works closely with delivering bodies that sit outside the Council to identify critical constraints and issues. For example, Planning and Public Health teams are liaising to understand the pressures, needs and public financing, including providing local health services to an increasing City Centre population.
26. It is only once the levels and distribution of development are clarified that the infrastructure needs arising from the plan can be fully understood in the round. Therefore, at this early stage of plan preparation it is about building up infrastructure evidence and funding opportunities with the aim of engaging those expected to deliver new infrastructure at later

stages. Their evidence will be important to the future examination of the plan and will identify funding gaps and how they may be addressed.

### Meeting local needs for affordable housing

27. This is recognised as one of the key objectives of the LLP2040 because it has a key role to play in helping deliver the City Ambition to tackle poverty and reduce inequality, is recognised in breakthrough projects to support good health & wellbeing outcomes for residents in housing need and to address the cost-of-living crisis. Access to good quality and affordable housing can also help manage the increasingly important issue of household energy costs and support the city's journey towards zero carbon.
28. The Leeds Affordable Housing Growth Partnership Action Plan 2022-25 recognises the contribution the Council and its partners has made in delivering affordable homes over the last 10 years and sets a route map to maintain this and to deliver a further step change to meet our affordable housing needs. It was endorsed by Executive Board in 2022 and published in 2023.
29. The needs for affordable housing identified in the Strategic Housing Market Assessment (SHMA) spread across the entire district, including the City Centre, and settlements in the outer areas. The SHMA notes that the District-wide need is for over 2,000 affordable homes per annum. Whilst the District delivers more affordable homes than comparable Core Cities (and had a record delivery of around 700 homes in 2023/24), this remains well below what is needed and a step change is therefore required. The planning system can help support direct delivery of Council Houses, grant funded homes delivered by Registered Providers (or Housing Associations) and developers to provide a proportion of their homes as affordable, but there remains a question about whether the planning system can deliver all of the affordable need without major national changes such as significantly more support for Council House Building or changes to the Right to Buy legislation.
30. The previous strategy of the Core Strategy placed an emphasis on delivering housing at scale in the main urban area and city centre. However, given current circumstances, these places often have less ability to deliver affordable homes at scale because of the impact of lower market values on development viability. Distributing development across the district, including some housing in outer settlements (particularly those with existing services and facilities), alongside planning for continued development in the city centre and main urban area, would go some way to meeting more affordable housing needs.
31. The Plan is also considering how to get the most out of land releases where land values are higher. This would match the ambition of the Government to secure 50% affordable housing on grey belt and Green Belt land in the Draft NPPF (and identifying where such opportunities might exist is integral to the approach to Green Belt Review and Site Assessment discussed in more detail below).
32. The Plan will need to ensure that S106 contributions are not the only means to delivering affordable housing, as viability remains an issue for the development industry in some locations and affordable housing is one of a number of planning policy requirements placed on development. Policies will therefore also focus on a range of wider potential options including:
  - a) releasing land exclusively and only for affordable housing, especially in areas where needs are relatively low and specific, such as in villages

- b) market-facing options for delivery, which could include alternatives to achieving the right type and quantum of affordable housing in developments that are operationally specific to allow more flexibility
- c) examining how access to grant funding works alongside planning policy to maximise delivery by Registered Providers
- d) exploring how changes to the way that affordable units once built are transferred to Registered Providers by developers could improve scheme viability and therefore the potential for more affordable units

#### The changing nature of commercial development and needs for employment land

33. There has been some significant economic growth in Leeds over the past plan period which has seen significant sites develop and become part of the City's commercial offer: at Kirkstall Forge, Wellington Place, Thorpe Park and White Rose Office Park all supported by new transport investment, and at Capitol Park taking advantage of the strategic highway network. Some sites are still to develop, including at Leeds Bradford Airport serving the North West as an employment hub and at Thorp Arch, serving the North East.
34. The Inclusive Growth Strategy sets the framework for economic growth in Leeds. Of the five fastest growing employment sectors, three are office or mainly office-based services including technical/professional, information and communication and administration and support services. Transport and storage (a key demand driver for industrial and warehousing space) is also a fast-growing sector reflecting the established shift of retailing to online, which is expected to continue and maintain appetite for distribution and related facilities. Other activities such as health and social work and arts/recreation have also grown strongly. At the same time, and taking advantage of the key anchor institutions within the City, the Council is looking to support growth in health innovation and digital technology investment.
35. The Council's Employment Land Review tells us that we should be looking for a minimum of 400ha of commercial land up to 2040 (approximately 1,000 standard football pitches) and around 550,000 square metres (nearly 6 million square feet) of office space. But the Council also needs to take account of the recent macro-economic instability which may underplay these needs. The market tells us that they are looking for choice and competition in the market for sites, across different sectors, for employment so as to invest in Leeds.
36. The developing evidence reveals a need for better retention and protection of local employment clusters which are being reduced by non-employment / leisure uses. There is also a potential conflict between maximising PDL for housing and retaining existing employment areas in the places that are more easily accessible and create mixed-use areas and neighbourhoods, particularly in the City Centre and fringe and more sustainable / accessible locations.
37. The plan will also address the types of employment land that should come forward for specific sectors so that Leeds can offer a portfolio of sites to a range of sectors at the right time and in the right place; this will likely need to include some provision for logistics to meet local needs. The plan will also seek to help facilitate innovation across the District so that different sectors that rely on each other for supply chains and/or collaboration can be accommodated within wider clusters, with an emphasis on connectivity and quality place-making.

## The spatial distribution of housing and economic growth

38. The plan will need to ensure that the right amounts (and right type) of development occurs in the right places. As part of this, and order to help explain what the overall strategy is for the different settlements and neighbourhoods in Leeds, LLP2040 will define a settlement network. This will group together settlements into broad categories based on their role in the district, taking into account their existing size and extent of services and facilities. How a place is categorised in the settlement network will be considered alongside a range of other factors, including local development needs, opportunities for future development and the extent to which these align with other policies and objectives in order to reach conclusions about the extent of development that the Plan could or should support in different locations. It is intended that the scale of growth planned for in different locations be proportionate to their role and function of different places. As part of this, it is recognised that in some locations the Plan will need to respond to particular opportunities for growth; due to the sustainability of the location, the availability or previously developed land (or potential to re-imagine how land is currently used) and potential for significant investment that will help facilitate new development. In other locations, the key driver for growth may be to meet specific local needs for new housing (including affordable housing and housing for older persons).
39. Through the Local Plan Update significant work has been taken place to understand which parts of the district function as 'complete, compact and connected' (CCC) places, where the services and facilities residents require to meet many of their daily needs are only a short distance from their home. It is intended that this will provide a starting point for considering where may be the most sustainable locations to focus new development, with areas meeting the 'good' or 'walkable/wheelable' CCC standard being primarily focussed within the parts of the Leeds Main Urban Area (including the City Centre), major settlements and some smaller settlements. It is noted in this work that there will be a diversity of abilities to walk 10 mins and the measures are based on average timings.
40. It is, however, recognised that whilst the aspiration is for the development planned for through LLP2040 to be in, or create, complete, compact and connected places, this may be challenging in some locations. This is particularly the case in some of the smaller settlements and villages where there are local needs for additional housing development, but the scale of development that is required and/or is likely to be appropriate may be unlikely to be sufficient to facilitate the delivery of significant additional services or facilities to the settlement. Similarly, on some urban extension sites, services and facilities may be just beyond the 10-minute walking / wheeling journey time that is reflected within the CCC approach. The Plan will need to balance these two key objectives and determine whether in some instances (particularly in those settlements that have some key services, even if not meeting the full CCC standard) growth may still be appropriate in order to meet local needs, whilst recognising that residents in these areas may remain more reliant on private cars and/or have longer journey times.
41. To inform such judgements, the approach to site assessment embeds the CCC approach into the site scoring methodology. This will enable the CCC scoring to be used to help identify sequentially preferable sites from a CCC perspective.
42. For many types of economic growth (and particularly general industrial development), the ability for employees to access a location by sustainable modes of transport is more relevant than whether it is in a CCC. A key objective will be to focus such development in the most accessible locations, recognising the benefits that this offers to both businesses and their employees. However, it is recognised that there may be some tensions between the market requirements of some sectors (particularly for sites that have good access to the motorway

network) and accessibility by sustainable modes. The Plan will need to strike an appropriate balance between these factors.

43. Alongside planning for the growth of existing settlements, the Government has also pledged a new wave of 'new towns' to help deliver new homes. In Leeds there have previously been new settlement proposals at Hedley Hall and Parlington. However, the amount of development required to create a sustainable community with all of the services and facilities residents require to meet the majority of their day-to-day needs without a need for travel is substantial. Significant upfront investment in utilities and transport infrastructure is also required. This means that these types of large-scale development projects are often very challenging and take a long time to come to fruition, and if proposed or identified would need to be a longer-term proposal stretching beyond the plan period for LLP2040.

#### Leeds Transformation Regeneration programme

44. With a potential increase in housing numbers and a drive towards densification and maximisation of PDL and infrastructure the City Centre will remain a key location to accommodate the District's growth. To that end, the Council has entered into a Leeds Transformational Regeneration Partnership with the Ministry for Housing, Communities and Local Government and West Yorkshire Combined Authority for a 10-year programme of change and investment focussed on central Leeds – the City Centre and 6 Neighbourhoods around it.
45. This would involve creating more new neighbourhoods in and around the City Centre which would allow for over 20,000 new homes. Much will depend on the capital grant commitments that Government can make to unlock development sites, support growth in low market areas and transform parts of the area through land assembly and new infrastructure.
46. The Council is building an evidence base on neighbourhood potential, infrastructure requirements, flood risk, green and blue infrastructure, utilities, viability and design-led options for place-making and new neighbourhood growth at scale. As the project develops there will be multi-stakeholder engagement and an understanding of the benefits that LTR brings to existing communities, including on the edge of the City Centre in terms of social and green infrastructure and accessibility. These neighbourhoods would deliver significant scale of housing growth and make good use of existing infrastructure; being capable of delivery relatively quickly as compared to a large new settlement that delivered the same number of homes.

#### The Role of Green Belt as part of the future Growth Strategy

47. LLP2040 will need to determine whether there are 'exceptional circumstances' that would justify the release of land from the Green Belt to help meet development needs of the District. The proposed changes to the NPPF revise the provision for undertaking changes to the Green Belt, from the current position which states that there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated, to the revised (draft) position that they should be reviewed and altered where insufficient land is identified to meet development needs through other non-Green Belt means, and doing so would not fundamentally undermine the function of the Green Belt:

*“Exceptional circumstances include, but are not limited to, instances where an authority cannot meet its identified need for housing, commercial or other development through other means. In these circumstances authorities should review Green Belt boundaries and propose alterations to meet these needs in full, unless the review provides clear evidence that such*

*alterations would fundamentally undermine the function of the Green Belt across the area of the plan as a whole.” (para.142)*

48. To help inform decisions relating to this, a ‘Green Belt Assessment’ is being undertaken. This will provide an objective and evidence-based assessment of the characteristics of the Leeds Green Belt and how different parts of the Green Belt serve the five purposes of the Green Belt set out in national planning policy:
- i. to check the unrestricted sprawl of large built-up areas;
  - ii. to prevent neighbouring towns merging into one another;
  - iii. to assist in safeguarding the countryside from encroachment;
  - iv. to preserve the setting and special character of historic towns; and
  - v. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

49. There is no national guidance on how to undertake assessments of Green Belt, and so the methodology being applied is based on learning from best practice of other authorities. A two-stage process to assessment is being taken, which is now common to many Green Belt assessments:

**Stage 1: Assessment of large ‘parcels’ of Green Belt land** – This looks at the strategic extent of the Leeds Green Belt, broken down into c.300 large ‘parcels’ of land defined by strong defensible boundaries such as roads, railways, rivers and canals. The extent to which each parcel serves each of the first four Green Belt purposes is being scored, from 1 (very weak role) to 5 (very strong role) in order to present a strategic picture of the Leeds Green Belt, and the relative sensitivity of different parts of the Green Belt to development. Individual parcels are not assessed against the fifth purpose, as it is challenging to differentiate between the contributions that individual parcels may make in encouraging the recycling or derelict or other urban land.

**Stage 2: Assessment of individual sites** – if, following the LLP2040 consultation, it is determined that there are exceptional circumstances that would justify the release of land from the Green Belt, stage 2 of the Green Belt assessment will commence. This will assess specific sites against the Green Belt purposes. The Green Belt assessment will be one of a number of assessments and considerations which will help determine which Green Belt sites should be allocated for development and/or designated as safeguarded land which is removed from the Green Belt to meet potential longer term development needs.

50. The conclusions of the stage 1 assessment will be published as part of the evidence base for the next LLP2040 consultation. By providing a strategic overview of the overall sensitivity of the Leeds Green Belt, and enabling the relative sensitivity of different land parcels across the district to be compared, it will be able to help inform decisions about the role of the Green Belt as part of the future Growth Strategy.
51. Alongside the Green Belt assessment, officers have also given initial consideration to the Government proposed ‘Grey Belt’. The draft NPPF suggests that this may include previously developed land along with other areas of land that make limited contribution to the five Green Belt purposes (but would exclude habitat sites, Sites of Special Scientific Interest, Local Green Space, irreplaceable habitats, designated heritage assets (and other heritage assets of archaeological interest) and areas at risk of flooding). Identifying potential areas of Grey Belt would be a separate exercise with a more specific focus on individual areas of land, rather than broad parcels. The need for clear guidance on this has been highlighted in the response to the recent NPPF consultation by both Leeds City Council and a number of development industry representatives and industry bodies.



## Approach to Site Assessment

52. The Plan will need to allocate specific sites for development to meet identified needs. At this stage, however, no decisions are being made about which sites should be allocated.
53. Some sites have already been agreed as being suitable for development by the Council (i.e. allocated in the AVLAAP or SAP, or granted planning permission in the last 3 years / where there is recent evidence that a site is moving towards being built out). These sites will not be re-assessed, though the capacity of these sites will be reviewed, and account taken of sites that are no longer expected to come forward, in order to establish the need for future land.
54. The site options being considered come from a variety of sources, including the Call for Sites, Urban Capacity Study, undeveloped UDP allocations, undeveloped planning permissions (>3 years old) and safeguarded land. To inform future decisions about which of these sites should be allocated for development, all sites are being assessed on a consistent basis. The methodology applied takes into account a wide range of indicators that are of relevance to the suitability of a site for development. This will enable a comparison to be made between the potential positive benefits and negative effects of individual sites.
55. The next consultation for LLP2040 will present all of the sites that are currently being considered for inclusion in the plan, along with the results of an initial assessment of each site, to allow a consideration of local options. This will be based on an initial assessment of the site's boundary and attributes, and the consultation will provide an opportunity for interested parties to 'fact-check' the initial assessment, to ensure that all relevant information has been taken into account. It will also enable site promoters to consider whether they would wish to amend their proposal through measures such as redrawing the boundary to avoid overlaps with areas of sensitivity (i.e. flood risk, biodiversity, heritage assets, trees, green space etc.) or amending the type / form of development proposed, including committing to providing additional facilities or incorporating measures that may help mitigate any identified negative impacts. The consultation will enable local communities to share their views and preferences on the potential site options.
56. It is proposed that the allocations ultimately made through LLP2040 be more specific than those in the existing Site Allocations Plan with regards to the expectations for development on a site. This may include the requirements relating to density, housing type and mix, green space and layout / design parameters. It is considered that this may have benefits in providing greater clarity to developers at an early stage about what will be required so that this can be factored in when sites are bought and initial proposals are drawn up. It will also provide communities with a greater degree of certainty about what they should expect to happen.

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

57. 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, 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?**

58. 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. The following diagram illustrates how the objectives of both the Local Plan Update and the Leeds Local Plan 2040 align with the Council best City Ambition and its 3 Pillars – all of which are cross-cutting:

	<b>Leeds Local Plan Update</b>	<b>Leeds Local Plan 2040</b>
<b>Zero Carbon</b>	<ul style="list-style-type: none"> <li>• Carbon Reduction: To minimise energy demand and meet all heat and power requirements without increasing carbon emissions, to support Leeds to meet its climate emergency goal of zero carbon by 2030.</li> <li>• Green and Blue Infrastructure: Protect, enhance and increase green and blue infrastructure to fulfil its multiple roles and benefits</li> <li>• Strategic Placemaking: Minimise carbon emissions by guiding new development to locations that offer the best opportunity for active travel, for use of public transport and for minimal use of private motor vehicles.</li> </ul>	<ul style="list-style-type: none"> <li>• Improved environment: Recognise the vital role of Green and Blue Infrastructure and ensure that development brings overall benefits for biodiversity.</li> <li>• Efficient use of land and resources: Prioritise the re-use of previously developed or underutilised land, secure an uplift in the density of development in sustainable locations, and use minerals resources wisely.</li> <li>• Complete, compact and connected places: Align the delivery of new homes and jobs with transport investment, and focus development in places where sustainable and active travel is most feasible.</li> </ul>
<b>Inclusive Growth</b>	<ul style="list-style-type: none"> <li>• Sustainable Infrastructure: support sustainable development and infrastructure that responds to the climate emergency</li> </ul>	<ul style="list-style-type: none"> <li>• Meet identified needs: Ensure enough development land is available in the right places to meet needs for employment growth, new homes, waste processing and minerals extraction.</li> <li>• Leeds’ regional role: Support and strengthen the role of Leeds as the centre of the West Yorkshire economy.</li> <li>• Support regeneration: Make the most of the potential that new development has to stimulate and support wider investment and regeneration.</li> <li>• Infrastructure delivery: Secure investment in new or improved social and physical infrastructure alongside development.</li> <li>• More affordable housing: Enable an increased number of affordable homes to be built in the places that they are needed.</li> </ul>
<b>Health &amp; Well-being</b>	<ul style="list-style-type: none"> <li>• Recognising that planning is key determinant of health &amp; well-being</li> <li>• Local Placemaking: capitalize upon a local community’s assets, inspiration and potential and create high quality, sustainable and</li> </ul>	<ul style="list-style-type: none"> <li>• Focus on local communities: Support vibrant town and local centres, safeguard valued community facilities and green spaces, and support healthy and active lifestyles.</li> </ul>

	resilient places that people want to live, work and play in and promote people's health, happiness and well-being.	<ul style="list-style-type: none"> <li>• Culture and innovation: Support culture and facilitate innovation across Leeds, including through the protection of important heritage and cultural assets.</li> <li>• Quality places: Deliver high quality design and placemaking, with net zero carbon buildings, green spaces and public spaces that serve both children and adults.</li> </ul>
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### What consultation and engagement has taken place?

Wards affected: ALL	
Have ward members been consulted?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

59. 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 Spring 2025. The consultation approach is aligning with the Statement of Community Involvement and includes:

- a) Reaching groups who don't ordinarily have a strong voice in planning e.g. young people and those with different needs with an aim to make material much more accessible to all
- b) Complementing face to face discussions with improved on-line and digital methods during engagement to maximise the reach of the plan
- c) Improving storytelling with maps and images as well as text

### What are the resource implications?

60. 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. The Council's planning service has made organisational changes in support of greater data and intelligence emphasis at the earlier stages of plan making. These changes have taken some time to implement, but provide a strong basis for a) call for sites, b) site assessments, c) sustainability appraisal, d) complete, connected and compact analysis, e) green belt review and f) distribution scenarios all being undertaken in-house with an estimated combined saving to the Council of £500,000.

61. 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?

62. 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 prepared a draft NPPF which is not yet finalised and only looks at certain topics. Further reform is likely through the plan preparation period. 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.

63. 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.
64. 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.
65. Many of the topic areas identified in the proposed scope of LLP 2040 (Appendix 1) 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?**

66. 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). The Plan is a document which is part of the Budget and Policy Framework and which must be adopted by Full Council.

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

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

67. 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?**

68. 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.
69. 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?**

70. With regards to the overall timescales for the LLP 2040, there are a number of steps to producing or updating a Local Plan. As illustrated in the diagram above, for LLP2040 we are proposing that there will be five key stages:
  - *Scoping* – the previous stage where we sought views about what the plan will address and what it should aim to achieve (consultation Feb-March 2023)
  - *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 received, we draft detailed policies which specify what will be expected from developments (late 2025).
  - *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 (mid 2026).
  - *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 (early 2027)

### **Appendices**

Appendix 1: List of topics being considered as part of Leeds Local Plan Update 2040

#### **Background papers**

- n/a

## Appendix 1 – List of topics being considered as part of Leeds Local Plan Update 2040

Topics being considered for potential inclusion as part of LLP2040 policies<sup>2</sup>. Note that it may be that topics are integrated together within a broader policy, rather than there being a specific policy for each heading (or the topic might break down into more than 1 policy)

<b>Topic</b>
<b>Spatial Strategy</b>
Overarching principles
Settlement Network
Potential opportunity areas
Regeneration
Density
Infrastructure delivery
Plan implementation & delivery
<b>Housing</b>
Overall housing requirements
Housing distribution
Affordable Housing
Co-living
Housing in Multiple Occupation
Housing accessibility and space standards
Self and custom build
Housing mix
Specialist housing needs
Purpose Built Student Accommodation
Gypsy and Travellers / Travelling Showpersons housing requirements
Locations / allocations / phasing policies
<b>Economic development</b>
Employment land needs
Locations / allocations / phasing policies
Employment land safeguarding
Leisure, Culture and Tourism
<b>Role of centres</b>
Overarching approach / strategy for centres
City Centre boundary
City Centre mixed uses
Hot food takeaways
Shopfronts, advertising, and signage
Gambling
<b>Minerals</b>
Minerals requirements
Safeguarding of minerals sites
Buffer zones
Fracking
Wharves
Locations / allocations policies
<b>Waste</b>
Waste requirement
Safeguarding of waste sites
Buffer zones
Locations / allocations policies

<sup>2</sup> it may be determined that specific policies are not needed, with the issue being adequately covered by national planning policy and/or national development management policies

<b>Transport and connectivity</b>
Highways contributions / investment priorities
Leeds Bradford Airport
Accessibility Standards
Active Travel
Transport Management
Parking standards
Public transport
Mass Transit
<b>Landscape and rural development</b>
Landscape
Open Land in Built Up Areas
Urban Green Corridors
Countryside / Green Belt / Rural Land
Agricultural and forestry workers dwellings
Stables and equestrian development
<b>Other topics</b>
Cemeteries and burial grounds
Community facilities
Heritage
Green space quality / accessibility
Hazardous substances
Child friendly communities
Play & Recreation
Gender inclusive planning
Amenity space
Public Rights Of Way amenity
Street Trees
Water courses and new development
Viability

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