

# Adoption of Remitted Parts of Leeds Site Allocations Plan 2024

Date: 15 January 2024

Report of: Director of City Development

Report to: Executive Board

Will the decision be open for call in?  Yes  No

Does the report contain confidential or exempt information?  Yes  No

## Brief Summary

The Leeds Site Allocations Plan (SAP) forms part of the Council's statutory Local Plan. It was subject to a High Court challenge on whether there were sufficient reasons to release 37 sites from the Green Belt. The High Court ruled that these aspects of the SAP needed to be reconsidered by the Planning Inspectorate. This started in 2021 and concluded when the Inspector published her final report in January 2024. This report sets out the changes that have been made to the SAP as a result i.e. 36 sites (totalling 193ha) remain in the Green Belt and 1 site (21ha) be released from the Green Belt to provide land for employment. Executive Board is being asked to recommend that the SAP Remittal now be adopted by Council.

The SAP was adopted by Council in 2019 and identified nearly 800 sites for housing and employment needs 2012-2028, as well as providing protection to 1,600 green spaces and requirements for new infrastructure, such as delivery of new schools and 63 retail designations. The preparation of the SAP was a significant undertaking for the City Council and involved a complex process of evidence, drafting, public consultation (5 individual rounds of public consultation and over 30 public consultation events), and an independent examination in public.

During that time (6 years) several external factors delayed the SAP's progress. Throughout, the Council updated its evidence base and progressed the plan, which was needed to secure a 5-year housing land supply for the District and avoid speculative development on sites not identified for housing. In latter stages, the Council reduced the level of housing sought from the Green Belt by over half - following unpredicted changes to Government guidance on the way housing numbers should be calculated - and upon adoption, the SAP released 4,070 homes on 37 sites from the Green Belt (representing 5% of the total housing supply) to meet overall numbers, ensure a fair distribution of housing opportunities to meet needs in places that did not have supplies of brownfield or non-Green Belt land and to provide flexibility in meeting housing targets.

The SAP was subject to a High Court challenge (by the Aireborough Neighbourhood Development Forum) in relation to those 37 Green Belt sites (36 housing sites and 1 mixed use site for housing and employment). This resulted in a High Court Order directing that the 37 sites for housing or mixed use that were in the Green Belt immediately before adoption of the Leeds Site Allocation Plan were ordered to be remitted to the Secretary of State and be treated as unadopted (a process known as the SAP Remittal).

Having considered up to date evidence (inc. housing needs and significant growth in housing delivery in the City Centre since the SAP was examined) the Council concluded there was sufficient land outside of Green Belt to avoid releasing any of the 37 sites for housing from the Green Belt to meet needs in the 2012 to 2028 plan period. However, the evidence (including the sterilisation of allocated employment land by safeguarding directions for rail projects) showed insufficient land outside of the Green Belt to meet employment needs, which warranted release from the Green Belt of one of the sites (Barrowby Lane, Manston) for employment use. Barrowby Lane, Manston had been allocated through the SAP for mixed housing and employment uses (and had no objections in principle at that time).

SAP Remittal (SAPR) was submitted to the Secretary of State on 26 March 2021 for independent examination following a period of public consultation. Examination hearings were held in 2021 and 2022 and the Inspector issued her report on 3<sup>rd</sup> January 2024.

The Inspector's Report and the Main Modifications (MMs) recommended to make the SAPR sound set out that the Inspector agrees with the Council that it is sound that 36 former housing allocations remain as Green Belt. Her conclusion takes account of the Core Strategy 2019 housing requirement and updated housing land supply position as well as the potential delivery of affordable housing from the sites, which she concludes weighs in favour of removing the land from the Green Belt, but is not wholly determinative in this instance.

During the examination, statements and decisions made by Government on its national and regional transport strategy - including the status of the High Speed 2 rail line and other rail projects were made. In turn, these statements and decisions could impact the status of safeguarded land for rail projects in Leeds, the sterilisation of safeguarded land for employment uses, and the consequent lack of employment land supply to meet plan targets up to 2028. To that end, the Inspector also concludes there is a need to allocate Barrowby Lane, Manston for employment uses to meet the employment needs of the Core Strategy up to 2028. Her conclusion takes account of: a) the Safeguarding Directions sterilising general employment sites; b) the land being needed for other rail projects; c) were all the Safeguarding Directions to be removed and all the employment land delivered before the end of 2028, a modest oversupply of employment land would represent a positive approach to general employment and would be in line with the Core Strategy; and d) the ability of the safeguarded land, if it were to be released, to contribute in full to employment land by the end of the plan period in March 2028 given the length of time that has elapsed. These she concludes form exceptional circumstance for Green Belt release of an employment land site via the SAP.

The MMs to the SAP need to be adopted by resolution of Council. This will ensure that the Site Allocations Plan 2019 is fully adopted (as amended 2024) is sound and continues to provide an up-to-date policies and allocations for development between 2012 and 2028.

## Recommendations

It is recommended that Executive Board recommend to Council that it:

- a) Notes the Inspector's Report on the Remitted Parts of the Site Allocations Plan and accepts the recommended Main Modifications. These are as detailed in an appendix to her Report (03 January 2024) at **Appendix 1**;
- b) Adopts the remitted parts of the Site Allocations Plan, which are contained in the Inspector's schedule of recommended Main Modifications (**Appendix 1**) with effect from

17th January 2024, pursuant to Section 23 of the Planning and Compulsory Purchase Act 2004 (as amended);

- c) Notes that the fully adopted SAP (as amended 2024) will be that provided as a Background Document to this report; and
- d) Notes that **Appendix 2** will replace Appendix 3 of the Site Allocations Plan which lists the saved UDP policies that will be superseded by the SAP (as amended 2024).

### **What is this report about?**

1. This report informs Members of the conclusions made by the Independent Planning Inspector in respect of the remitted parts of the Site Allocations Plan (SAPR). The conclusions are set out in the report at **Appendix 1**.
2. The Inspector has concluded that the SAPR provides an appropriate basis for the planning of Leeds City, provided that a number of main modifications (MMs) are made to it. The Council requested that the Inspector recommend any MMs necessary to enable the SAPR to be adopted.
3. The Main Modifications can be summarised as follows:
  - Deletion of the 36 remitted housing allocations and inclusion of each in the Green Belt. Modification to policies and text that give reasons for and effect to those deleted remitted housing allocations and the housing element of site MX2-38 (the mixed-use site), including taking account of the Core Strategy 2019 housing requirement and updated housing land supply position.
  - Modifications to policy MX2-38 to allocate the site for general employment use rather than mixed use (and renumber it as EG2-37) along with consequential changes to the other parts of the SAPR including those relating to employment land supply.
4. This report seeks Executive Board's recommendation to Council that it adopts the Inspector's recommended MMs to the SAPR. The specific detail of these MMs are out in the Appendix to the Inspector's Report (**Appendix 1**). The impact of adopting these MMs will be to allocate 1 Green Belt site for the purpose of employment and delete 36 of the remitted housing allocations and inclusion of each within the Green Belt. Adoption of these MMs will result in a fully adopted Site Allocations Plan (2019, as amended 2024) in the form set out in the Background Document to this report.

### The Site Allocations Plan

5. The Leeds Site Allocations Plan (SAP) was adopted on the 10<sup>th</sup> July 2019. The SAP plays a key strategic role in taking forward the spatial and land use elements of the Best City Ambition by identifying sites for housing and employment needs between 2012 and 2028, as well as providing protection to green spaces and requirements for new infrastructure, such as the delivery of new schools. The SAP forms part of the Local Plan for Leeds, alongside the Core Strategy (and the Selective Review), the Unitary Development Plan, the Aire Valley Leeds Area Action Plan and the Natural Resources and Waste Plan and made neighbourhood plans. In adopting the SAP the City Council ensured that Leeds was meeting Government ambitions to have a plan containing housing targets and site allocations that is less than 5 years old, a situation shared by a minority of local planning authorities in England.
6. The SAP, on adoption in 2019, identified nearly 800 sites for housing and employment needs between 2012 and 2028, as well as providing protection to 1,600 green spaces and requirements for new infrastructure, such as the delivery of new schools and 63 retail designations. The SAP was subject to 5 individual rounds of public consultation and over 30 public consultation events.

7. The preparation of the SAP was a significant undertaking for the City Council and involved a complex process of drafting, extensive public consultation, and examination over 6 years. During that time several external factors influenced the process; including landowners removing their sites and changes to Government guidance (including the ways in which housing numbers are to be calculated). Throughout the process the Council responded positively to changes whilst making timely progress on the plan, which upon adoption secured a 5-year housing land supply for the District and avoided the continued speculative development on sites not identified for housing that had been happening in the District throughout the SAP's preparation at mounting cost to the Council and raising significant concerns in local communities.
8. When the Government, in 2017, amended the way in which housing targets should be calculated it was clear that targets in the adopted Core Strategy, set at 70,000 new homes, were too high. As a result, the Council proactively reduced the level of land to be sourced from the Green Belt by over half. The SAP upon adoption released land for 4,070 homes on 37 sites from the Green Belt (representing 5% of the total housing supply) for reasons of meeting overall housing needs, ensuring a distribution of housing opportunities to meet needs in places which did not have supplies of brownfield or non-Green Belt greenfield land and to provide (as required by national guidance) a choice/flexibility to developers in the land needed to meet housing targets.

### High Court Challenge

9. In 2020 the SAP was the subject of a High Court challenge (by Aireborough Neighbourhood Development Forum). The challenge was successful in relation to inadequate reasons given in respect of the justification for Green Belt release and the use of Housing Market Characteristic Areas (HMCAs) in the site selection process, as well as errors of fact in relation to housing supply. The implications of a lower housing requirement in the Core Strategy Selective Review, which was being examined in parallel with the SAP examination, was considered during the proceedings of the High Court.
10. On 10th August 2020, the High Court ordered '*..all parts of the Leeds Site Allocations Plan (the SAP) which allocates sites for housing, including mixed use allocations..., that were in the Green Belt immediately before the SAP's adoption (including the aspects of all policies and text that give reasons for, and effect to, those allocations), be remitted to the Secretary of State for independent examination...'*. The matter was remitted to the Secretary of State to start from '*where the error of law occurred*'. It was also ordered by the Court that the parts of the SAP referred to in the order, should be '*treated as not having been adopted or approved.*'

### Site Allocations Plan Remittal

11. The examination of the Remitted Parts of the Leeds Site Allocations Plan began on 26 March 2021. The examination hearings relating to the Remitted Parts of the Site Allocations Plan (the 37 sites) were held between 14 and 17 September 2021, and 18 May 2022 by the appointed Planning Inspector (Louise Gibbons BA Hons MRTPI).
12. The progress of the SAP Remittal has been lengthy and complex, with delays, which have been influenced by external factors. The process is summarised in **Table 1** below and in short is set out below.
13. In preparing for the submission of the SAPR and following a review of housing and employment land evidence, since the adoption of the SAP in 2019, the Council concluded that exceptional circumstances did not exist to justify the release of the remitted sites for housing due to the increase in housing supply and change in housing requirement (see more detail below). The Council then took the view that 36 of the remitted sites were unsound and that to make the SAP sound they would need to be deleted.
14. In addition, having regard to consultation responses and evidence, it was concluded that there

was justification to allocate 1 mixed-use site (SAP reference MX2-38 Barrowby Lane) for wholly general employment use. This was therefore included as a Green Belt site allocation for general employment use as proposed site allocation EG2-37 Barrowby Lane as part of the submission of proposed changes to the SAPR.

15. Part of the Council's justification for not allocating sites for housing in the Green Belt via the SAPR was as a result of significant housing completions being delivered in the City Centre since the SAP examination in 2019, something the Council had been signalling for some period of time through the grant of planning permissions, but which hadn't at the time the SAP was examined been seen as an on the ground trend. Other factors included the wider strategic policies of the Core Strategy including: a revised housing target and the distribution of housing to meet local needs across the District, alongside a need to review the Plan every 5 years to ensure it remained up to date.
16. Part of the Council's justification for continuing to propose allocating a site for employment land rested on the fact that the Government had, through a Safeguarding Direction for High Speed Rail and other rail projects, sterilised circa 50ha of existing general employment land allocations in the SAP and Aire Valley Leeds Plan which rendered them unavailable for employment use at a time when the District was seeking to secure inclusive economic growth. The Council considered that whilst Safeguarding Directions are in place (for HS2 and for other prospective rail projects such as Northern Powerhouse Rail, Transpennine Upgrades or Leeds to Sheffield enhancements) there would continue to be a shortfall of employment land within the District, and that this constituted exceptional circumstances justifying the release of Green Belt land for proposed employment site EG2-37. To that end, clarity around a northern rail strategy and the status of the HS2 project and other rail projects through various Government announcements were key material considerations for the Council and the Inspector. These included: a) Government's Integrated Rail Plan (2021) which paused the development of the HS2 phase 2 B East project, but set out a commitment to bring high speed rail to Leeds, b) Terms of Reference for a Rail Study for Leeds (2023), c) Government's 'Network North: Transforming British Transport' publication (2023) which cancelled HS2 phase 2b East, but includes Northern Powerhouse Rail and Leeds to Sheffield upgrades.
17. Meeting the targets for general employment land in the Core Strategy is a key objective for the Council as it manages the needs of a successful district against a difficult national and global economic affected by recent shocks. To that end, the Core Strategy's aims of 'Promoting a diverse, enterprising and competitive economy supported by a skilled work force' and 'Delivering economic development which makes best use of land and premises across the District in sustainable locations, accessible to the community and wider labour market' are important objectives which will be met by this remittal process.
18. The Inspector heard evidence from all parties at hearings in public during September 2021 and also in May 2022. She ran 3 rounds of consultation during the process and received representations of support and objection for the deletion of the 36 sites from the Green Belt. She also received representations of support and objection to the allocation of site EG2-37; with objectors arguing that the land should not be released from the Green Belt as it was not needed for employment, because alternative sites that had been safeguarded would be released to allow for development instead. She held a specific hearing session in May 2022 on this matter and site EG2-37, where representors were able to put their case to her.
19. This following chronology is set out for Executive Board as it clarifies the way the Council has been driven by all available evidence at all relevant times, throughout the SAP Remittal examination process. This has been a complex process set against a national picture of changes to the Government's transport strategy in the north.

Table 1: Chronology of the Site Allocations Plan Remittal (SAPR) process

<b>Date</b>	<b>Event</b>
Jul 2019	Adoption of SAP
Aug 2019	Challenge submitted by Aireborough Neighbourhood Development Forum
Feb 2020	High Court Hearing
Jun 2020	High Court Decision
Jan 2021	Public Consultation on Council's SAPR Main Modifications (MM)
Jan 2021	Representation that site EG2-37 (Barrowby Lane, Manston) should remain allocated for employment land
Mar 2021	Submission of SAPR (including a Proposed MM seeking allocation of EG2-37 as a result of representation)
Jun 2021	Further Public Consultation on Council's Proposed MM (EG2-37)
Sep 2021	Initial Examination Hearings
Nov 2021	Integrated Rail Plan (IRP) published - Council submits to Inspector
Jan 2022	Public Consultation on Inspector's proposed Main Modifications (which accepted the Council's submitted MMs including allocation of EG2-37)
Jan 2022	Inspector receives representations (including raising IRP and impact on safeguarding and objecting to allocation of EG2-37)
Feb 2022	Council submits further note setting out implications of the IRP on SAPR
Mar 2022	Inspector requests further hearing solely on allocation of EG2-37
May 2022	Further Examination Hearings on site EG2-37
Jul 2022	Inspector issues letter to Council suggesting that EG2-37 should be removed from the SAP
Jul 2022	Council seeks clarity from Inspector on reasoning for her decision; submitting that it is not clear, could confuse consultees and that fuller reasoning should be provided before any Main Modifications consultation
Nov 2022	Letter from the Inspector clarifying her decision
Jan 2023	Further Public Consultation on Inspector's Proposed Main Modifications and removal of EG2-37 as an allocation
Jan 2023	Council submits representation to Inspector
Apr 2023	Council submits further evidence from Transport Select Committee
May 2023	Inspector invites written comments from all representors on whether further Council evidence "tips the balance" in favour of allocation of EG2-37
Oct 2023	Inspector invites Council to comment on the implications of the Prime Minister's announcement that HS2 funding was to be redirected to other projects
Oct 2023	Council responds including noting that the Government's 'Network North: Transforming British Transport' clarifies that safeguarded land originally for HS2 and rail projects would now continue to be safeguarded for other rail projects especially in and around Leeds, at least until Summer 2024 depending on whether land is needed for rail projects
Jan 2024	Council receives final Inspectors Report

20. The Inspector's final Report was published on 5th January 2024. Her conclusions are that:
- a) the remitted part of the SAP is legally compliant and subject to adoption of her recommended Main Modifications is sound as
  - b) even considered in combination, the benefits of allocating the remitted sites for housing in terms of delivering more market and affordable housing, improving housing mix and type, and helping to achieve the Core Strategy's spatial distribution would not be sufficient to outweigh the harm to the Green Belt against the current Core Strategy policies and evidence. The exceptional circumstances required to alter the Green Belt boundaries are not demonstrated as required by the NPPF. This applies equally to those individual remitted sites that have planning permission or a resolution to grant permission. The removal of 36 sites from the Green Belt and their allocation for housing development is not justified or consistent with national policy including that relating to Green Belts.

21. The Inspector therefore agrees with the Council that the 36 remitted allocated housing sites will need to be removed from the SAP. This conclusion also applies to the mixed-use site MX2-38 in respect of its housing component.
22. Her further conclusions are that:
  - c) given the sterilising impact of the Safeguarding Directions on employment land supply the exceptional circumstances required by paragraph 83 of the 2012 Framework does apply to EG2-37. The site would be suitable for general employment use, and the release of the site EG2-37 from the Green Belt would provide 21.2 ha of general employment land making a significant contribution to the supply and reducing the shortfall. Therefore, the site's allocation as EG2-37 for wholly general employment land is justified, and it would be consistent with the NPPF as whole.
23. Accordingly, subject to the MMs recommended by the Inspector, her conclusions accept the Council's proposals in respect of the SAPR as being legally compliant and sound. This includes accepting the Council's case that there are exceptional circumstances to allocate land at Barrowby Lane, Manston for employment use at this stage of plan-making. Based on her interpretation of the reports, studies and announcements from the Government she is satisfied that the Safeguarding Directions sterilising the affected general employment sites are still in place and the land may still be needed for other rail projects and this would not be known until Summer 2024 at the earliest. Whilst the Safeguarding Direction remains in place there will continue to be a shortfall of general employment land. She also notes in paragraph 133 of her report that *"If all the sites covered by the safeguarded direction were able to be counted towards the general employment land supply before 2028 as well as including site EG2-37, there would be a positive supply position of 26.2 hectares."* She clarifies that a modest oversupply would represent a positive approach and be in line with the Core Strategy.

### Next Steps

24. Following the receipt of the Inspector's Report and recommended MMs (**Appendix 1**), the SAPR can only be adopted if it includes all of the MMs recommended by the Inspector together with any additional modifications which are consequential and do not materially affect the policies in the plan. It is noted that the fully adopted SAP (as amended 2024 by the SAPR) is provided as a Background Document to this report and the SAPR MMs make changes to and arising from the deletion of the 36 housing sites and allocation of 1 employment site.
25. Adoption of the remitted part of the SAP will result in a fully adopted up to date and sound SAP as shown as the Background Paper to this report. The changes to policies will also update the list of superseded saved UDP policies as specified in (Appendix 3 to the SAP). The update of policies superseded by the SAP are provided at **Appendix 2**.
26. The Sustainability Appraisal (SA) is an iterative process (conducted at each stage) and the SA documents and addenda prepared throughout the process are available on the Council's web-site. It includes the Sustainability Appraisal's prepared at each stage and can be accessed using the following link - [here](#). The overall SA process will be set out in an SA Adoption Statement which the Council, is required to prepare once the remitted part of the SAP is adopted. This will be published on the web-site.
27. Following adoption, the Council will publish the adoption documents and Adoption Statement, in accordance with Regulations and send a copy of the Adoption Statement to the Secretary of State. The SAP (as amended 2024) will also be published on the Council's website together with the amended Policies Map which is a spatial expression of the policies and site boundaries within the Plan.
28. The Equalities and Diversity / Cohesion and Integration (EDCI) screening has been revised to reflect the impact of the Inspector's recommended MMs and provided at **Appendix 3**.

## What impact will this proposal have?

29. Adoption of the remitted part of the SAP will amend the adopted SAP 2019 by deleting 36 sites returning them to the Green Belt and allocating 1 Green Belt site for employment use. The SAP (as amended 2024) will be a fully adopted and up to date plan which carries full weight in the determination of planning applications. The deletion of 36 housing sites from the SAP means 193ha of land remains in the Green Belt and the allocation of 1 employment site from the Green Belt removes 21ha from the Green Belt. Therefore, the adoption of the remitted part of the SAP has a net impact of retaining 172ha of land in the Green Belt.
30. The adopted SAP (2024) will therefore provide sufficient housing and employment land supply to 2028 in line with the Core Strategy. The conclusion of the lengthy SAP Remittal process will also enable the Council to focus its limited planning resources on the Local Plan Update 1 and Leeds Local Plan 2040.

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

Health and Wellbeing                       Inclusive Growth                       Zero Carbon

31. There is a clear role for planning in delivering against all of the Council's key pillars as established through the Best City Ambition. Once adopted, the SAP (as amended 2024) supports the Best City Ambition as follows:
- Health and Well-being Strategy – the SAP provides sufficient housing to meet the needs of people in Leeds, without incursion into the Green Belt and in areas where housing waiting list needs are strongest;
  - Climate Emergency – the SAP has delivered sites for homes and employment in a range of sites across the District in accessible locations including connecting with transport hubs where possible. In so doing and balancing the competing needs for development it has done this with minimal impact on the natural environment and greenfield land;
  - Inclusive Growth Strategy – the SAPR has positively allocated further employment land, which the City needs, in line with the Core Strategy requirements.

## What consultation and engagement has taken place?

Wards affected: All

Have ward members been consulted?     Yes                       No

32. Following the High Court Order in August 2020 there have been four stages of consultation for the remitted part of the SAP relating to the Council's proposed Main Modifications and the Inspector's proposed Main Modifications. The regulatory requirements and the Statement of Community Involvement have been followed, including reflecting the temporary provisions for consultation during the Covid-19 pandemic.
33. Members of the Council's Development Plan Panel have been advised on this matter, but due to the constraints of the Christmas period in securing a formal meeting in advance of this special meeting of Executive Board there has been no formal agreement on the matter.

## What are the resource implications?

34. The adoption of the SAP 2019 (as amended 2024) has been met from within existing budget provisions. The SAP Remittal has been an additional cost which the Council had not envisaged and costs have increased as a result of additional hearing sessions, uncertainty around



Government transport strategy.

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

35. Key risks were around the length of time the process took given the SAP was not considered fully adopted, however adoption of the SAPR removes the risks as Leeds will have a fully adopted and up to date Plan.

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

36. The remittal of the SAP has been undertaken pursuant to section 113(7)(b) and 113(7C)(a) of the Planning and Compulsory Purchase Act 2004 (PCPA).
37. The recommendations and reasons of the Inspector have been published pursuant to the Town and Country Planning (Local Planning) Regulations 2012 (the Regulations).
38. As Part of a development plan document the remitted part of the SAP falls within the Council's budget and policy framework and must be adopted by a resolution of Full Council and in accordance with the PCPA.
39. The adoption of the remitted part of the SAP must comply with s.23 PCPA which requires that the Council may adopt the document with the Main Modifications recommended by the Inspector together with any additional (consequential) modifications that do not materially affect the policies set out in the document but cannot adopt a document unless in accordance with s.23. Therefore, to adopt the remitted part of the SAP the Council must adopt all of the Inspector's MMs.
40. Pursuant to the Regulations, following adoption the Council is required to publish the adopted Plan together with the Policies Map, adoptions statement and sustainability report and notify those people who have requested to be notified of the adoption.
41. This report is not eligible for call in as the SAP Remittal falls within the Council's Budget and Policy Framework. Executive & Decision Making Procedure Rule 5.1.2 notes that, 'The power to call in decisions does not extend to Decisions made in accordance with the Budget and Policy Framework Procedure Rules'.

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

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

42. There is an option not to adopt the Inspectors Main Modifications however that is discounted as it would mean the Council is without a fully adopted and up to date SAP.

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

43. Success will be measured by the adoption of the remitted part of the SAP resulting in an up to date SAP (as amended 2024). This will enable the Council to provide clarity to residents and investors of Leeds as to the housing and employment allocations that are being relied upon between 2012 and 2028.

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

44. Subject to Executive Board's recommendation to Council, Council will be recommended to adopt the remitted part of the SAP at its meeting on 17 January 2024.

### **Appendices**

Appendix 1 – Inspector's Report and Main Modifications

Appendix 2 – Schedule of Deleted Policies (Appendix 3 of the SAP)

Appendix 3 - EDCI screening

**Background papers**

Site Allocations Plan 2019 (as amended 2024) [Link](#)