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Leeds CITY COUNCIL

# DEVELOPMENT PLAN PANEL

**Meeting to be held remotely on**
**Wednesday, 29th July, 2020**
**at 11.00 am**

## MEMBERSHIP

Councillors

B Anderson
C Campbell
A Carter
C Gruen
J McKenna
N Walshaw (Chair)
S Arif
D Collins
R Finnigan
L Mulherin
K Ritchie

**Note to observers of the meeting:**

**To remotely observe this meeting, please click on the link below. This will take you to Leeds City Council's YouTube channel, and the meeting can be viewed live from there.**

https://www.youtube.com/user/Leedscouncil

**Agenda compiled by:**
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**Governance Services**
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**Head of Strategic Planning:**
**Martin Elliot**
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# A G E N D A

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| 1 | | | **APPEALS AGAINST REFUSAL OF INSPECTION OF DOCUMENTS**<br><br>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)<br><br>(*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) | |
| 2 | | | **EXEMPT INFORMATION - POSSIBLE EXCLUSION OF THE PRESS AND PUBLIC**<br><br>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.<br><br>2 To consider whether or not to accept the officers recommendation in respect of the above information.<br><br>3 If so, to formally pass the following resolution:-<br><br>**RESOLVED –** 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: | |

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| 3 | | | **LATE ITEMS**<br><br>To identify items which have been admitted to the agenda by the Chair for consideration.<br><br>(The special circumstance shall be specified in the minutes). | |
| 4 | | | **DECLARATION OF DISCLOSABLE PECUNIARY INTERESTS**<br><br>To disclose or draw attention to any disclosable pecuniary interests for the purposes of Section 31 of the Localism Act 2011 and paragraphs 13-16 of the Members' Code of Conduct | |
| 5 | | | **APOLOGIES FOR ABSENCE** | |
| 6 | | | **MINUTES**<br><br>To approve the minutes of the last meeting held on 21st January 2020 as a correct record. | 5 - 8 |
| 7 | | | **LOCAL PLAN UPDATE**<br><br>To consider the report of the Chief Planning Officer which provides an update on four key issues: the Legal Challenge to the Site Allocations Plan; the Site Allocations Plan Review; the Local Plan Review and the Local Plan Update. The report also provides the latest information on the legal challenge and uses the review of extant Local Plan policies to begin the process of updating the Local Plan and sets an initial broad scope of that update, alongside a timetable for preparation and consultation. | 9 - 48 |
| 8 | | | **DATE AND TIME OF NEXT MEETING**<br><br>To note the date and time of the next meeting is proposed as Tuesday 8th September 2020 at 1.30 pm. | |

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| | | | **<u>Third Party Recording</u>**<br><br>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.<br><br>Use of Recordings by Third Parties– code of practice<br><br>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.<br>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. | |

**Development Plan Panel**

**Tuesday, 21st January, 2020**

**PRESENT:** Councillor N Walshaw in the Chair

Councillors J McKenna, S Arif, D Collins, L Mulherin, K Ritchie, R. Stephenson and P Wray

**40 Appeals Against Refusal of Inspection of Documents**
There are no appeals against refusal.

**41 Exempt Information - Possible Exclusion of the Press and Public**
There was no exempt information.

**42 Late Items**
There were no late items.

**43 Declaration of Disclosable Pecuniary Interests**
There were no declarations of disclosable pecuniary interests.

**44 Apologies for Absence**
Apologies for absence were received from Councillors Anderson, Campbell, C Gruen and Finnigan.

Councillor Stephenson acted as a substitute for Councillor Anderson and Councillor Wray acted as a substitute for Councillor Gruen.

**45 Minutes - 12th November 2019**
**RESOLVED** – That the minutes of the Development Plan Panel meeting held on 12th November 2019, be approved as an accurate record.
Matters Arising

Minute 35 – Members were updated on the position of the Aireborough Neighbourhood Development Forum Challenge to the SAP. Members were informed that the judge of the oral hearing had resolved to hear representations on the 5th and 6th February 2020 in court, in regard to the claim to request permission for the challenge; subject to permission being granted, this determined whether a further hearing would be needed, and should permission be refused the application would come to a close.

Minute 36 – Climate Emergency and Planning. An update on the White Rose Forest Project would be provided to Panel Members, including elements of engagement between elected members and residents.

Minute 37 – Transport Supplementary Planning Document (SPD). A Member sought clarity on re-including garages as counting towards parking spaces, in the Climate Emergency SPD. Members heard an update would be provided at a later date.

Minute 38 – Implementation of Core Strategy Policy H4. Members were informed that an update on the Authority Monitoring Report (AMR), would be provided at a future DPP meeting.

The Head of Strategic Planning informed Members that the role of Group Manager, Policy and Plans, had successfully been appointed to Adam Harvatt.

**46 Local Development Scheme (Local Plan Work Programme) Update 2020**

The report of the Chief Planning Officer provided the Panel with an updated Local Development Scheme (LDS) work programme for the period 2020 to 2030, setting out the administrative context for the review of the Site Allocations Plan (SAP) and update of the Local Plan.

Appended to the report included the latest draft version of the LDS.

The Head of Strategic Planning introduced the report, and explained that the Council intended to update specific parts of the Local Plan, beginning with Housing Policies of the SAP to align with the Core Strategy and other polices in regard to the climate emergency. It was highlighted that progress has been made with:

- Adoption of the SAP
- Adoption of the Core Strategy Selective Review (CSSR)
- 8 made Neighbourhood Plans
- A Hot Food Takeaway Supplementary Planning Document (SPD)

The submitted report (at 9.2) set out the Neighbourhood Areas that had been designated. Members were informed that good progress had been made on the Neighbourhood Plans (NPs), particularly those in the Inner Areas.

In responding to a query regarding Policy H10 Minimum Space Standards of the Core Strategy, Members were informed of the intention to provide the Panel with an update at the DPP to be held in March 2020.

A suggestion to reflect policies regarding tree planting and biodiversity within the CSSR was discussed. Officers agreed that a focus on implementing climate emergency policies in the context of a climate declaration could be added to the Local Development Scheme.

Clarity was sought on Neighbourhood Areas being in two wards, and Members noted that this was due to ward boundaries falling within different Housing Market Characteristic Areas (HMCAs).

The Article 4 Direction Plan was discussed in regard to policy compliant schemes. Officers explained that Article 4 did not form part of the Local Development Plan, and would be taken into consideration as part of a wider work programme, including requests to extend its geographical scope.

A suggestion for a minor amendment was made to the timescales of the review due date to be changed to March 2020, and received support from Members of the Panel.

The report was welcomed by Members.

**RESOLVED** – To note the contents of the updated LDS, with the inclusion of the suggestions as set out above, prior to the LDS being placed on the Council's web-site.

**47 Date and Time of Next Meeting**

**RESOLVED** – To note the date and time of the next meeting as 18th February 2020 at 1.30 p.m.

(The meeting concluded at 13:55)

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Leeds CITY COUNCIL

Report author: Martin Elliot, Adam Harvatt and Lois Pickering. Tel: 0113 37 87634

**Report of Chief Planning Officer**

**Report to Development Plan Panel**

**Date: 29th July 2020**

**Subject: Local Plan Update**

| | | |
|---|---|---|
| Are specific electoral wards affected?<br>If yes, name(s) of ward(s): ALL | ☒ Yes | ☐ No |
| Has consultation been carried out? | ☐ Yes | ☒ No |
| Are there implications for equality and diversity and cohesion and integration? | ☐ Yes | ☒ No |
| Will the decision be open for call-in? | ☐ Yes | ☒ No |
| Does the report contain confidential or exempt information?<br>If relevant, access to information procedure rule number:<br>Appendix number: | ☐ Yes | ☒ No |

**Summary**

1. The Leeds Local Plan sets the land use and spatial planning framework for how Leeds will develop. The current Leeds Local Plan is a set of five Development Plan Documents (DPDs) mainly covering the period between 2012 and 2028, but with some policies covering up to 2033. The Leeds Local Plan and 17 Neighbourhood Plans together form the statutory Development Plan, which is used, alongside the National Planning Policy Framework, to help direct decisions on planning applications in Leeds.

2. The Leeds Site Allocations Plan (the SAP) was adopted by Full Council on 10th July 2019, following receipt of the independent Inspectors' Report (IR) from the Planning Inspectorate. Post adoption, the SAP was the subject of a Legal Challenge by the Aireborough Neighbourhood Development Forum, submitted to the High Court on 20th September 2019. The case primarily focussed on the release of Green Belt land within the Aireborough Housing Market Characteristic Area for housing within the SAP. Subsequently, the case was heard at the High Court in February 2020, with Judgment being handed down on Monday 8th June 2020. The Judge found that three of the seven grounds constituted errors of law (within the IR) and has sought suggested relief on these three grounds from the parties involved. The Council's preference is that,

having found errors, the most appropriate remedy is for the four Aireborough Green Belt sites to be quashed. The option remains open to the Judge to either follow the Council's preference, or, quash all Green Belt housing sites (as advocated by the Aireborough Neighbourhood Development Forum), or to remit the SAP back to the Secretary of State so that they can reconsider the errors found in the IR. The Judge has not ordered relief at the time of preparing this report.

3. The SAP Policy HGR1 requires that once the Core Strategy Selective Review (CSSR) is adopted the Council will undertake a review and look again at whether there is a need for additional housing allocations and safeguarded land designations to deliver the adopted housing requirement post 2023. The CSSR was adopted at Full Council on 11th September 2019. Regrettably, the legal challenge has already delayed progression of a SAP Review (intended to commence last autumn). The Judgment and associated relief create further potential impacts upon the scope and future timescale of the Site Allocations Plan Review moving forward.

4. Until the relief is known, it is not possible to define the precise scope of the SAP Review because of the different implications the relief which could be granted might have. This could lead to the potential for further delay, especially if the relief granted involves remitting the SAP back to the Secretary of State.

5. As well as reviewing the SAP, the Council committed in its Local Development Scheme (the work programme for the Development Plan, which was approved by DPP on 21st January 2020) to review and update other policies and plans. Members will recall that Local Authorities are required by the Town and Country Planning Act (England) Regulations 2012 to review the policies that make up the Local Plan, every five years. This exercise has been undertaken and is shown in Appendix 1.The current Leeds Local Plan is a set of five Development Plan Documents (DPDs) mainly covering the period between 2012 and 2028, but with some policies covering up to 2033. The Core Strategy sets the overall strategic framework for development in Leeds and is underpinned by other DPDs covering Natural Resources and Waste and site allocations. A number of years have passed since the Core Strategy (CS) was adopted in 2014. Whilst it was subject to an update in 2019 this was selective and focussed largely on housing, leaving much of the remainder untouched. Similarly the Natural Resources and Waste Plan was adopted in 2013 and since then, despite it ensuring good progress regarding the management of the natural environment, the declaration of a Climate Emergency in Leeds is a driver to update it. Within the context of national planning guidance, evidence and local priorities, it is crucial therefore that the local plan is kept up to date and subject to regular review, to ensure it remains fit for purpose in providing certainty for communities and investors.

6. At a local level, as part of the Best Council Plan Leeds has three strategies which underpin its policies and programmes: the climate emergency, the inclusive growth strategy and the health and well-being strategy. Planning both sits at the heart of and cuts across these strategies and links their objectives through development decisions, including place-making. This also entails identifying infrastructure requirements and helping to guide investment decisions. It is noted that Full Council on the 11th September 2019 have already

agreed that the Local Plan Update should focus on measures to address the Climate Emergency, through policies to deliver more trees in the city and to improve sustainable access to new housing, and that the strategic policy on Leeds Bradford Airport be updated. In addition, the Climate Emergency Advisory Committee Planning, Energy and Building Group has Local Plan Update for Climate Change as one of its priorities and Members will recall that a DPP workshop in January also began the process of looking at what Climate Change policies should be a focus for the Update.

7. Since January, a review of extant Local Plan policies has been undertaken. This helps show how existing policies are performing, their conformity with national guidance and whether an update needs to be considered. There are over 250 policies in the Local Plan and it is not proposed that they all need to be updated. Some, such as those updated by Core Strategy Selective Review, Site Allocations Plan and AVLAAP, are very recently adopted and remain up to date.

8. Whilst speed of progress on this work has been slightly affected by the Covid-19 outbreak, the pandemic has more fundamental and far reaching implications for the nature of the Local Plan policies and the role of the planning system in an economic recovery. Since March, the review of the Local Plan Update policies is being re-appraised to take into account the pandemic as a driver for change. This is happening collectively across the Council and the initial outputs of this work are that whilst it is not expected to fundamentally alter the spatial approach of the Plan, the pandemic (and lockdown experience) reinforces a need to update policies on local and town centres and the importance of place making as a means of creating resilient communities. The Local Plan Update (LPU) will also need to take into account emerging Central Government Planning Reforms, following announcements by the Prime Minister. Within this context, a Planning Policy Paper setting out the changes is due later this month.

9. This paper sets out a suggested direction of travel for the (LPU), which takes into account the outcomes of the review of extant policies. It proposes that the LPU focus on updating some of the strategic policies of the Core Strategy and the Natural Resources and Waste Plan, alongside any non-strategic policies that have potential to support the Council's zero carbon trajectory to 2030.

**Recommendations**

10. Panel Members are asked to:

(i) note and comment on the contents of the report as it relates to the Site Allocation Plan legal challenge and review,

(ii) note and comment on the contents of Appendix 1 (Local Plan Review), in advance of it being approved by the Chief Planner,

(iii) consider and provide comments on the initial scope of the Local Plan Update, and

(iv) agree the broad timetable set out

## 1. Purpose of this report

1.1 The purpose of this report is to update Members on 1) The Legal Challenge to the Site Allocations Plan, 2) the Site Allocations Plan Review, 3) The Local Plan Review, and 4) the Local Plan Update. The paper provides the latest information on the legal challenge and uses the review of extant Local Plan policies to begin the process of updating the Local Plan and set an initial broad scope of that update, alongside a timetable for preparation and consultation.

## 2. Background information

Site Allocations Plan Legal Challenge

2.1 The Leeds Site Allocations Plan (SAP) was adopted by Full Council on 10th July 2019. The SAP provides site allocations and requirements that help to deliver the Adopted Core Strategy (CS) 2014, ensuring that sufficient land is available in appropriate locations to meet the targets set out in the CS for housing (including Gypsies, Travellers and Travelling Showpeople), employment, retail and green space.

2.2 To account for the (then) imminent adoption of the CSSR, the SAP Inspectors introduced SAP Policy HGR1 which requires that once the new CS housing target (introduced into the CS on adoption of the CSSR) was adopted, the Council would undertake a review and look again at whether there is a need for additional housing allocations and safeguarded land designations to deliver the new CS housing target (this is the 'SAP Review').

2.3 Upon Adoption, the housing provision in the SAP was below the existing CS 2014 housing target. This was because the Council had taken steps to reflect a known downward housing trajectory (which was being advanced in its CSSR and, reduce (by over half) the amount of Green Belt land to be allocated. This resulted in the removal of 32 proposed Green Belt sites from the SAP.

2.4 The CSSR was adopted on 11th September 2019 and amended the housing requirement from 70,000 (net) between 2012-2028 to 51,952 (net) between 2017-2033.

2.5 However, following the day of adoption of a plan there is a six week statutory period within which interested parties may seek permission of the High Court to challenge the legality of the Plan. Aireborough Neighbourhood Development Forum submitted a High Court challenge in August 2019.

2.6 The challenge was on 7 grounds. The claimant's grounds in summary were that:

- The Council has breached the Strategic Environment Assessment (SEA) Regulations1 by failing to consider reasonable alternatives to revising the SAP and allocating some Green Belt land in light of lower housing targets in the Core Strategy Selective Review

- There was inadequate consultation on the Sustainability Appraisal/SEA

- There were no reasons for Green Belt release in light of a lower housing figure and it was irrational of the Council to carry on with the Plan

- The use of HMCAs to determine how much Green Belt to release was inadequate

- The Council ignored new "windfall" planning permissions arising after submission of the Plan.

2.7 The Council resisted the Claim on the basis that it was in the public interest to do so and was of the view that no legal errors had occurred. The Council received no other claims at the time. There were three interested parties in the Claim. Gallagher Estates and Avant Homes who own New Birks Farm and Will's Gill sites respectively and the Secretary of State for Housing, Communities, and Local Government.

2.8 The case was heard at the High Court in February 2020 with Judgment being handed down on Monday 8th June 2020. The Judge, Mrs Justice Lieven DBE, allowed the Claim on three out of the seven grounds raised. These three grounds related to three legal errors, each on the part of the Inspectors, alone. None of these three grounds found that that the City Council itself proceeded unlawfully or took a legally flawed approach to the preparation of the SAP.

2.9 The errors of the independent inspectors (not of the Council) identified by the Judge were:

- legally deficient reasons given in their report on:
    - justifying the release of the specific Green Belt sites and site selection process; and
    - an error of fact relating to the calculated increase in supply of housing (mainly in the city centre) during the process

2.10 It should be noted that the Judge did not find that Green Belt sites could not properly be released and nor did she find that the site selection process was in error.

2.11 Two of the seven grounds were not granted permission to proceed. These related to an alleged breach of the Planning Act and an alleged error in the Main Modifications.

2.12 Two of the grounds were granted permission to proceed but were not upheld. These related to claims against the Council's alleged breaches of the Strategic Environmental Assessment (SEA) Regulations. Whilst the Judge did find that the Council had erred in not carrying out specific public consultation on whether to withdraw, carry on or revise the Plan, she found that through the process of governance that was followed and the subsequent re-submission of the Plan (with its associated consultation) that there was no prejudice to third parties as it was entirely clear that the outcome chosen would have been the same even if consultation had been undertaken.

2.13 All parties were invited by the Judge to propose their preferred relief to the Court for its further deliberation. It was submitted by the Aireborough Neighbourhood

Development Forum that their preferred relief was to see the quashing of all Green Belt sites in the SAP. It is noted that this is contrary to what was set out in the Forum's initial statement of facts and grounds when they submitted the Claim originally. At the time they noted *"The Claimants concerns are focussed on those parts of the SAP which allocate housing sites in the GB in Aireborough and, accordingly, it would be content with relief that is limited to the Court quashing just those parts of the SAP."*

2.14 The Council submitted that their preferred relief was, firstly, that there should be no remedy to the errors identified, but if the Judge considered a remedy necessary that it should pertain only to the quashing of the four Green Belt sites in Aireborough.

2.15 The developer interested parties have submitted that the Plan should be remitted back to the Planning Inspectorate (PINS). PINS have submitted that the Plan should be remitted back to the Council.

2.16 No timescales have been given by the Court for the handing down of the Order for Relief and irrespective of the submissions made by all parties the decision on relief lies with the Judge alone.

Five Year Housing Land Supply

2.17 The Judgment has implications on the Council's Five Year Housing Land Supply (5YS) and on the SAP Review. In terms of the 5YS, relief affecting only the Aireborough sites would have a marginal impact, as the loss of the 475 units on the four affected sites represents a very small proportion of the overall supply. However, relief affecting all Green Belt housing allocations would have a more significant impact on supply, whilst still retaining a 5YS (on the basis of September 2019 SHLAA). It is noted that a SHLAA review will need to be undertaken in September 2020 and also that the Government's recent announcement on permitted development rights for new housing may have an impact on supply. At this stage it is too early to tell what the impacts of the pandemic will be on the supply and delivery of housing. Whilst construction has slowed during lockdown there are signs that this is recovering and Government has put in place measures to stimulate the house building sector.

Site Allocations Plan Review

2.18 As referenced above, a review of the Site Allocations Plan (SAP) is required by policy HGR1 of the adopted SAP. HGR1 reads:

**HGR 1 THE SITE ALLOCATIONS PLAN WILL BE SUBJECT OF A REVIEW DURING THE PLAN PERIOD, AS FOLLOWS:**

1. **TO BE COMMENCED FOLLOWING ADOPTION OF THE CORE STRATEGY SELECTIVE REVIEW,**
2. **TO BE SUBMITTED NO LATER THAN 31 DECEMBER 2021, AND**
3. **TO ENSURE THAT SUFFICIENT LAND FOR HOUSING IS ALLOCATED AND SAFEGUARDED LAND DESIGNATED SO AS TO COMPLY WITH CORE STRATEGY SELECTIVE REVIEW HOUSING REQUIREMENTS.**

2.19 Officers are preparing the SAP Review documentation for initial consultation as prescribed by Regulation 18 of the Town and Country Planning Act (England) Regulations 2012. However, until the remedy on the SAP Legal Challenge is known the technical work which underpins the scope of the SAPR cannot be fully progressed and consultation remains delayed. It is anticipated that before Regulation 18 consultation begins, the scope of the SAPR would be considered by Development Plan Panel and then approval will be sought by Executive Board.

Local Plan Update (LPU)

2.20 The Council's Local Development Scheme[1] was agreed by Panel in January 2020. This sets a 3-year work programme for the Leeds Local Plan and noted that the scope of the LPU would be determined through (a) the review of Local Plan Policies to see if they need updating and (b) in response to Council priorities, in particular the climate emergency.

2.21 The current Leeds Local Plan comprises:

- UDP Review 2006 (saved policies)
- Adopted Core Strategy 2014 (selectively reviewed 2019)
- Natural Resources and Waste DPD 2013
- Aire Valley Leeds Area Action Plan 2017
- Site Allocations Plan 2019

2.22 The review of Local Plan Policies to assess whether policies should be considered for updating has been undertaken and is set out in detail at Appendix 1. It concludes that there are policies, including some of the Spatial Policies of the Core Strategy and policies in the Natural Resources and Waste Plan and saved UDP, where the evidence base needs refreshing or where local circumstances have changed to warrant consideration of an update. Most recently, as part of scope development for the Local Plan Update, background work based on the review has been refreshed to take into account the challenges presented by Covid-19, with particular focus on policies relating to High Street resilience (such as flexibility in changes of use away from retail). This work is still ongoing and officers would welcome Members' views on this area of work.

2.23 The Unitary Development Plan was adopted in 2006 and various policies within it have been saved (and remain extant) or superseded by subsequent Development Plan Documents.

2.24 The Natural Resources and Waste Plan was adopted in 2013 (and revised in 2015) and contains policies on minerals (including the safeguarding of sites), waste (including the allocation of sites and protection of wharves for canal freight movements), energy (including avoiding energy use, energy efficiency and supporting low carbon generation), air quality, water (including water

[1] required under section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011)

efficiency and avoiding flood risk from rivers and surface water) and land (including contaminated land and conservation of trees).

2.25 The Core Strategy (CS) was adopted in 2014 and sets the strategic framework for the Local Plan as a whole. The CS was updated in 2019 through a Selective Review which focussed on Strategic Policy 6 and Strategic Policy 7 alongside policies on affordable housing, greenspace provision, and accessibility of new homes, housing standards and electric vehicle charging points.

2.26 The Aire Valley Leeds Area Action Plan (AVLAAP) was adopted in 2017 and provides for allocations within a specific part of Leeds. It remains up to date.

2.27 The Site Allocations Plan (SAP) was adopted in 2019 and provides for allocations across the District (except for the areas covered by the AVLAAP). The SAP Review is subject to its own plan-making process as set out in the Local Development Scheme and will, depending upon the outcome and timing of the SAP Legal Challenge, most likely progress in advance of the LPU.

2.28 It is noted that Full Council on 11th September 2019 approved that: *"To reflect the Council's declaration of Climate Emergency in March 2019, Council commits to including measures to address the Climate Emergency in subsequent Core Strategy Reviews. This should include a strategic plan to deliver more trees in the city, a greater emphasis on how new housing developments are accessed i.e. not solely by the private car and a clear commitment to review Spatial Policy 12 of the Core Strategy relating to growth at Leeds Bradford Airport, as a matter of urgency, and notes that the Council has already committed to bringing a timetable to Development Plan Panel this Autumn"*.

2.29 Following the initial scoping work that has been undertaken on the Local Plan Update the world has been hit by the Covid-19 pandemic, which has had a profound impact on all aspects of life within the country. Of particular importance to the Local Plan Update is the impact the pandemic has had on employment (both in terms of employment levels but also more broadly its impact on employment patterns such as commuting and office floorspace demand), the retail sector and the resilience of our High Streets, and people's access to greenspace. This has resulted in a reassessment of the need for future policies in light of Covid-19, which is still ongoing.

## 3. Main issues

SAP Legal Challenge

3.1 Following the court's decision to find in favour of the claimant on three grounds, four broad approaches were considered by the Council with regard to preferred relief. These are considered below.

3.2 **No Relief** – The Council's preferred remedy which would leave the SAP as adopted, with no further action or delay required.

3.3 **Quashing of the four Green Belt housing allocation in Aireborough** – the remedy originally sought by the claimant and, if the Court does not find in favour of the 'No Relief' option, the Council's next preferred relief as it limits the remedy to 475 homes. This would have minimal impact on the 5YS, avoid the delay of

remitting back to PINS, addresses the injury done to the claimant and would have minimal impact on the Council's housing land supply.

3.4 **Remit the Plan back to the Planning Inspectorate** – The Judge reserves the right to instruct PINS to reconsider their report and whilst this would place the responsibility back on PINS to revisit their decision making it is unlikely that this will be a quick process and may involve re-opening the examination in public. Timing would also be dependent on the availability of planning inspectors and there are no guarantees that the original Inspectors will be given the opportunity to clarify the errors in their report. This option would place the timescales firmly outside of the Council's control, leading to the potential for significant delay and uncertainty.

3.5 **Quashing of all Green Belt housing allocations in the SAP** – the current remedy sought by the claimants and the least preferred option by the Council. This would significantly reduce the Council's housing land supply (by circa 4,000 homes), resulting in an imbalance of delivery focussed on the City Centre and Inner areas during a time of impending economic recession which may weaken delivery in these areas.

3.6 As yet, no relief has been ordered by the Court and no timescale has been set for this process.

Site Allocations Plan Review

3.7 It is clear that the nature of the relief ordered by the High Court will have an impact on the proposed scope of the Site Allocations Plan Review. The primary purpose of the SAPR is to assess whether further housing land is required to be allocated up to the CS plan period of 2033. It will do this partly by looking at the existing stock of allocated land in the SAP and clearly if this is affected by the relief the court grants it will change the technical basis upon which the SAPR is evidenced.

3.8 It is considered possible that if the relief ordered by the High Court is limited to the quashing of the four Green Belt sites in Aireborough then the scope of the SAPR will likely be more limited than if the judgement resulted in the quashing of all Green Belt housing allocations within the SAP. To that end, should all sites previously removed from the Green Belt be quashed (and thus returned to the Green Belt) it would potentially increase the likelihood of more allocations being needed through the SAPR and would leave the outer area HMCAs providing fewer homes than the Core Strategy indicates.

Local Plan Update

3.9 This section of the report is focused on describing the background to the relevant planning matters which will inform the LPU, signalling forthcoming issues and identifying and inviting possible future considerations. It does not fully prescribe what the LPU should conclude on a particular matter as, at this early stage, an up-to-date evidence base is needed alongside wider consultation. The work that has informed this report therefore does not seek to prejudge consultation on the scope of the LPU (Regulation 18 consultation), rather it serves to help inform it.

3.10 The need to update policies to help Leeds meet its declared Climate Emergency is paramount because the commitment of the Council is to be net zero carbon by 2030. This is to ensure that the amount of carbon emissions (as a proportion of the global carbon budget) that Leeds emits between now and 2050 stays within the 1.5°C temperature rise recommended by the United Nations.

3.11 Therefore one approach would be to only focus on those policies within the Local Plan which can contribute towards reducing carbon emissions. However, policies to mitigate and adapt to the impacts of climate change and policies to promote sustainable development are very much interrelated. Moreover, under the current planning system local authorities can lose control over sustainable development if policies relevant to the determination of planning applications are considered to be out of date (where out of date can be linked to not being reviewed within 5 years) (NPPF, paragraph 11).

3.12 As the LPU is a plan-making process it is important to note that issues raised during forthcoming formal consultation stages in addition to the focused input of specialist bodies (for example infrastructure providers) will also inform the future direction and content of the LPU. The preparation of the LPU is an iterative process and possible options will narrow and refine in response to emerging information and evidence as work on the plan progresses.

3.13 This report sets out in headline form the issues which a LPU might consider. There are a number of specific aspects to highlight at this early stage.

What are the key drivers for the LPU?

3.14 Leeds Best Council Plan sets 7 priorities which all relate to spatial planning. There are 3 overarching Council strategies as follows: Leeds Inclusive Growth Strategy, Health and Well-being Strategy and the Climate Emergency. The LPU must help to deliver each of these through development decisions and the strategic framework for the growth of Leeds.

3.15 The National Planning Policy Framework (NPPF) is an important influence on the LPU's content. Compliance with the NPPF is one of the tests for soundness against which the LPU will be measured. It sets out a list of matters, which the strategic policies in the LPU should address. Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision (in line with the presumption in favour of sustainable development) for:

(a) housing (including affordable housing), employment, retail, leisure and other commercial development;

(b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

(c) community facilities (such as health, education and cultural infrastructure);

(d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

3.16 Cross-boundary matters & the Duty to Co-operate are important and the LPU must ensure that cross boundary issues are being dealt with on an on-going basis and demonstrate this through the preparation of Statements of Common Ground.

How might specific Strategic Policies need to be updated?

3.17 At a national level, significant reforms to the planning system in England have been heralded by the Ministry for Housing and Local Government. Whilst the detail of these changes has not been announced, it will be essential that these changes are taken into account when reviewing and updating the Local Plan.

3.18 At a regional level, the impacts of the West Yorkshire devolution deal need to be understood in a planning context in Leeds, particularly as a result of the West Yorkshire Combined Authority Spatial Development Strategy.

3.19 At a local level, the Spatial Development Strategy of the Local Plan is set out in the Spatial Policies ("SP") of the Core Strategy, which are akin to the strategic policies noted in the NPPF (at para 3.15 above). These physically shape and transform the District and identify which areas of Leeds play the key roles in delivering development, set levels of development required, whilst ensuring that the distinct character of Leeds is enhanced. The SP policies currently include:

- the location of development (which sets out through a settlement hierarchy an approach to priority areas for development and use of previously developed land) which should be updated in line with the Council priorities and consequential amendments arising from any changes to other strategic policies,

- housing (the supply and quality of new homes in meeting housing need) - the housing requirement, policy on affordable housing, housing space standards and accessible homes has recently been updated through the Core Strategy Selective Review (2019) and allocations for housing are implemented through the SAP, AVLAAP and SAP Review. Therefore policies SP6 and SP7 are not considered to need updating now,

- the economy (providing opportunities for local employment opportunities and job growth) - which relies on evidence from 2010 and should be updated so as to reflect an up to date understanding of key sectors in Leeds, the strategic employment locations, impacts and opportunities of HS2 and local employment opportunities,

- the role of town and local centres, (providing facilities and services for the community in accessible locations) - which is based on evidence from 2010 and should be updated to consider changes to the nature of the retail economy, role of local centres and their resilience,

- the role of the city centre (promotes the city centres role as the major regional capital and key development opportunities and challenges within and support linkages) - which is based on evidence from 2010 and should be updated to consider changes to the nature of the city centre and key corridors alongside side the impacts of HS2 and the development of the City Station,

- regeneration (targeting specific priority areas across the District) - which is based on Indices of Multiple Deprivation (2010) and does not fully reflect the Council's priorities for inclusive growth and health and well-being,

- integrating transport and spatial planning (improving public transport and opportunities for walking and cycling) which needs to be updated to reflect the Leeds Public Transport Investment Programme alongside the West Yorkshire Transport Strategy as well as the Council's priorities,

- managing the growth of Leeds Airport (recognising the impact on climate change through the generation of emissions from air travel and seeking to minimise the local impact on the environment (including transport trips)) - which needs to be updated in light of the climate emergency and the airport's masterplan,

- Green infrastructure (identifies key Green Infrastructure opportunities) - which needs to be updated to ensure that the Council's policies assist in mitigating and adapting to climate change and providing an enhanced basis for biodiversity resilience,

- the Green Belt (establishing a defensible boundary for the Green Belt which can endure beyond the plan period) - which has been established through the SAP and AVLAAP and is therefore considered to be fully up to date and in line with national guidance.

3.20 Members are invited to consider whether these remain the right list of strategic policies for the District. It is noted, in line with the Council's priorities, that consideration may need to be given to new SP policies on:

- climate change (which could clarify the specific local policy actions that are considered necessary to ensure that Leeds meets its carbon reduction commitments)

- the environment (which could include refreshed and updated NRWP policies so as to provide a co-ordinated strategic basis for the management, protection and resilience of the environmental resources/assets in Leeds)

- place making (which could set out the strategic role that place making plays in different communities in terms of ensuring resilient and stronger communities, alongside meeting Council priorities whilst maintaining and enhancing local character and distinctiveness)

- infrastructure and investment (including the infrastructure funding required and the relationship between the Plan and Community Infrastructure Levy and Section 106 contributions from development), with a particular focus on HS2, the City Station and Mass Transit.

<u>How might policies for the Climate Emergency need to be updated?</u>

3.21 The NRWP contains a range of strategic and non-strategic policies on the environment and natural capital of Leeds (as set out in para 2.5 above). These

policies (alongside policies on managing environmental resources and green infrastructure in the Core Strategy) are highly relevant to the climate emergency and they will need to be updated as a priority. It is proposed that as part of this consideration be given to including NRWP policies within the SP policy framework to increase their prominence as underpinning environmental policies for the plan as a whole.

3.22 The shape of strategic and non-strategic policies on the climate emergency can be summarised as follows:

- Spatial Strategy - the LPU provides an opportunity to strengthen policies on the location of development, densities of development in the most sustainable places, maximisation of brownfield land, avoiding flood risk and accessibility of development close to public transport hubs. It also affords the opportunity to create improved green infrastructure.

- Place-making – creating resilient places is a way of meeting carbon reduction, as well as tackling inclusive growth and maximising health and well-being. The Building Better, Building Beautiful Commission was an independent body set up to advise government on how to promote and increase the use of high-quality design for new build homes and neighbourhoods. In its final report, 'Living with beauty: promoting health, well-being and sustainable growth' (2020), the Commission has set out its recommendations to government and these (which include asking for beauty in new developments, refusing ugliness and promoting stewardship) will help inform the LPU. As part of this Members have called for new housing developments to place priority away from the car, promote active and towards people – in meeting their housing needs.

- Carbon reduction and sustainable design & construction – the LPU can consider policies for net zero buildings in Leeds and the Council now needs to develop an evidence base that shows how this can be justified and achieved. There are expectations that all homes should provide an element of energy generation e.g. from photovoltaic panels which are now long established as technology.

- Renewable and low carbon energy generation and district heating – the LPU can explore the role of local low carbon and renewable energy potential within Leeds. There is an opportunity to identify suitable areas for renewable and low carbon energy sources (such as solar, wind and geo-thermal), heat distribution and for energy storage. The LPU can also set a target for grid connected renewable energy generation capacity and identify where sites could connect to the existing and potential future heat networks. Discussions with the West Yorkshire Combined Authority (WYCA) have taken place to make best use of recent evidence gathering by WYCA and ensure that the authority's potential for renewable and low carbon energy fits with the strategic sub-regional policy approach.

- Green & Blue infrastructure, tree cover, green space and biodiversity - There are opportunities to set targets and make land available for new tree planting and other measures to improve tree cover. Natural flood risk management options are preferred and there are opportunities to

reinforce and strengthen policies on the use of Sustainable Drainage Systems (SuDS). An objective of the LPU will also be to improve resilience of biodiversity, for example to improve the habitat network to give species a better chance of survival, to improve the management of sites, to identify and map biodiversity opportunities and to introduce a biodiversity off-setting policy. Work has started on a Strategic Flood Risk Assessment with Flood Risk Management colleagues, which will be necessary to underpin the LPU and take account of the recent Flood Alleviation Scheme and climate change scenarios for flood risk.

- Sustainable travel, car free living and walkable neighbourhoods – there needs to be closer alignment between development and transport planning so that options for car free living and walkable neighbourhoods can be realistically considered. Accessibility standards may need to be reviewed and employment as well as housing sites must be accessible by means other than the private car and enable active travel.

What other strategic policies may need to be considered?

3.23 The NRWP contains policies on minerals which may need to reflect more up to date evidence on minerals requirements and supply alongside a reflection of demand for aggregates such as development of HS2. Similarly, policies and allocations on waste management, need to ensure that opportunities to meet the needs of their area for the management of waste streams are identified. This links to the climate emergency and importance of the waste hierarchy.

What is the initial preferred scope for the LPU?

3.24 In responding to the climate emergency and taking account of the need for the Council's Local Plan to be robust and up to date in order for it to guide and determine planning applications the following theme areas for consideration as part of the initial scope for the LPU are suggested:

- The strategic policies of the Core Strategy (aside from SP6: the Housing Requirement and Allocation of Housing Land, SP7: Distribution of Housing Land and SP10: Green Belt), including new policies on infrastructure (HS2, Mass Transit), place-making, renewable energy, employment land requirements

- The strategic policies of the Natural Resources and Waste Plan (to be incorporated into the Core Strategy)

- Non-strategic policies of the Core Strategy, saved UDP and Natural Resources and Waste Plan which relate to climate change, including updates to the EN policies exploring increasing renewable energy generation through developments and spatially identifying opportunities for renewable energy generation

3.25 It is important to note that this list of high level themes and policies does not pre-judge the scope of the LPU that must be a) informed by a Sustainability Appraisal and b) decided upon following the Regulation 18 consultation.

3.26 In addition, this thematic list does not yet capture policy areas that have been profoundly affected by Covid-19, such as the availability of greenspace within the City Centre and reviewing the thresholds for greenspace provision within the City Centre, or issues relating to healthy and resilient High Streets. These aspects of the LPU scope are currently being reviewed by officers.

What happens to other policies?

3.27 All policies have been reviewed, as set out in Appendix 1. The LPU is the vehicle by which necessary policies are updated. Depending on the agreed initial scope of the LPU it may be necessary to carry out further updates, in line with the Government's requirements to review and update plans every 5 years.

Timetable for the update

3.28 Development Plan Panel members will recall that a DPP workshop took place in February. A focus of this was to consider what policies are relevant to the climate emergency and how they may support the Council's trajectory to 2030. Following that initial consideration, Members will be updated on the progress of shaping draft policies to assist in setting the scope of the LPU at the meetings of DPP later this year with a view to shaping policy outcomes and objectives. Agreeing the specific scope of the document is the next key phase of the timetable and weighing in the balance the benefits and disbenefits of extending the scope beyond the Climate Emergency. A series of topic based briefing notes are nearing completion and can be brought to Panel for Member's consideration to help guide that scope.

3.29 The first regulatory milestone in this timetable is an initial stage of public consultation ('Regulation 18' consultation) which was initially scheduled for autumn/winter 2020 but has been delayed as a result of the SAP Legal Challenge and Covid-19. It is now indicatively scheduled to start in spring 2021. The purpose of this stage is to get views on what matters the Local Plan Update will need to consider and address i.e. its scope. The relevant regulations specify that, as part of the plan preparation process, we should invite representations on what the local plan ought to contain. Whilst being mindful of the need to not pre-judge the outcome of that consultation, it is considered that it would be helpful and speed up the process if the Council's preferred scope of policies (with initial detail of what they are to contain) were used as a means of generating responses to the Plan at that early stage. This would help shorten the timescale for preparation and focus comments.

## 4. Corporate considerations

### 4.1 Consultation and engagement

4.1.1 Following the Court's Order for Relief in the SAP Legal Challenge, officers will be able to undertake further work in the scoping out and evidence gathering for the SAP Review. This will be subject to a Regulation 18 consultation, in accordance with regulations.

4.1.2 The LPU is at an early stage of preparation and therefore consultation to date has been limited. However, engagement has taken place with the Executive Member for Climate Change, Transport and Sustainable Development and

Panel Chairs on the need for a LPU and its focus on spatial policies and the climate change emergency. In addition, as stated in para 2.26 above, Full Council have already agreed that the Local Plan Update should focus on policies which will assist Leeds in meeting its Climate Emergency objectives of being net zero carbon by 2030.

4.1.3 As referenced in para 3.28 Members of Development Plan Panel have had a workshop in February on what policies are relevant to the climate emergency and how they may support the Council's trajectory to net zero by 2030.

### 4.2 Equality and diversity / cohesion and integration

4.2.1 An EDCI is not required for this report. Appropriate EDCI screenings / assessments will be undertaken in the course of the next steps noted in the report.

### 4.3 Council policies and the Best Council Plan

4.3.1 There is a clear role for planning in delivering against all of the Council's priorities as established through the Best Council Plan. In particular it is anticipated that the LPU will help deliver against the Council's key strategies, as follows::

Health and Well-being Strategy – through policies including the design of places, quality of housing and accessibility and the integration of public health infrastructure

Climate Emergency –managing the transition to zero carbon via policies including: the design of places, the location of development, accessibility to public transport, use of brownfield land, energy, supply, generation and the efficiency of buildings

Inclusive Growth Strategy – through policies including the links between homes and jobs, planning for the land use and infrastructure needs of key economic sectors, the location of development, green infrastructure and connectivity

4.3.2 Planning is relevant to the delivery of all the priorities in the Best Council Plan and this role will be appraised and maximised as policies in the LPU are progressed and implemented.

### 4.4 Resources, procurement and value for money

4.4.1 There are no specific implications to this report. However, whilst at this time it is considered that the scope of the Site Allocations Plan Review will not be resource intensive, this position could change depending upon the nature of the relief ordered. Notwithstanding the position on the SAPR, the Local Plan Update and accompanying evidence base is a resource intensive endeavour which incurs additional cost, in terms of evidence base preparation and consultation, at a time of increased budget pressure. In general, costs will be met from within existing budgets.

### 4.5 Legal implications, access to information, and call-in

4.5.1 There are no legal implications arising from the recommendations in this report.

### 4.6 Risk management

4.6.1 The impacts of the High Court decision could have significant implications for the Council's housing land supply. Whilst the Council has continued to make strong submissions to the Court, the relief ordered is a process that is outside of the Council's control. When further details on the relief emerges officers will be able to present possible mitigation measures to the Executive Member and the Panel, as required.

4.6.2 Given the delay caused to the SAPR by the High Court Challenge, it is now considered unlikely that the Council will meet the December 2021 deadline for submitting the SAPR to the Secretary of State.

4.6.3 The risk of not updating policies following the review of policies in accordance with the provisions of Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 and further set out in paragraph 33 of the National Planning Policy Framework, (NPPF, 2019), is that there is an increasing likelihood that policies contained within the Local Plan will be found to be out of date. Under existing policy within the NPPF, should the most important policies for determining planning applications be found to be out of date, the presumption in favour of sustainable development dictates that decision-making will be in accordance with the NPPF, rather than the Local Plan.

4.6.4 Following the Council's climate emergency declaration in March 2019, there is an opportunity to enshrine the Council's desire to reach net zero carbon emissions by 2030 through new planning policies. However, without new policies as set through a LPU, the Council's ability to influence the carbon emissions of new developments, beyond the provisions of national policy and existing local policy may be limited.

4.6.5 The LPU needs to be based on up-to-date objective evidence which considers in detail the feasibility, deliverability and viability of the Council's policies. The service will need to commission technical evidence base in this regard, which is expected to be funded through existing budgets.

## 5. Conclusions

5.1 This report has set out the latest position of the Site Allocations Plan Legal Challenge and the Site Allocations Plan Review. Once the relief of the Challenge is known the Council will be able to move forward with scoping out the SAPR with a view to moving towards consultation (Regulation 18) and therefore making all reasonable endeavours to submit the Plan by the December 2021 deadline.

5.2 This report also sets out the need for a Local Plan Update and the proposed scope for such an update, to help inform public consultation on that scope (Regulation 18). Important drivers for this include the Best Council Plan, local evidence and the focus of national planning policy and guidance. In drawing these various strands together it is crucial that the Local Plan is 'fit for purpose' in providing a framework for day to day decision taking, whilst providing a focus for a more resilient and sustainable District, in delivering economic, social and environmental objectives at the same time.

5.3 In sum it is the Natural Resources and Waste Local Plan (NRWLP), the policies in the Core Strategy which were not reviewed in 2019 and those policies within the UDP (2006) which are relevant to the climate change emergency declaration that are the main focus for update at this stage. However, further consideration is also underway on the need for the updating of other policies in light of the Covid-19 pandemic. The report suggests broad timescales and milestones that will need to be achieved in order to make suitable progress on the preparation of the LPU and invites Members to provide comment and guidance on all matters raised within the report.

## 6. Recommendations

6.1 Panel Members are asked to:

(j) note and comment on the contents of the report as it relates to the Site Allocation Plan legal challenge and review,

(ii) note and comment on the contents of Appendix 1 (Local Plan Review), in advance of it being approved by the Chief Planner,

(iii) consider and provide comments on the initial scope of the Local Plan Update, and

(iv) agree the broad timetable set out.

# Appendix 1: Summary table of Leeds Local Plan Review 2020

| LEEDS LOCAL PLAN DOCUMENT | POLICY REF. | POLICY TITLE | NPPF TOPIC | Consider updating | Recommendation |
|---|---|---|---|---|---|
| CS 2014 | GENERAL POLICY | | Achieving sustainable development | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible despite being considered up-to-date and in conformity with NPPF. | Consider as part of the Local Plan Update. |
| CS 2014 | SPATIAL POLICY 1 | LOCATION OF DEVELOPMENT | Achieving sustainable development | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible despite being considered up-to-date and in conformity with NPPF. | Consider as part of the Local Plan Update. |
| CS 2014 | SPATIAL POLICY 2 | HIERARCHY OF CENTRES AND SPATIAL APPROACH TO RETAILING, OFFICES, INTENSIVE LEISURE AND CULTURE | Ensuring the vitality of town centres | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF. | |
| CS 2014 | SPATIAL POLICY 3 | ROLE OF LEEDS CITY CENTRE | Ensuring the vitality of town centres | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF. | |
| CS 2014 | SPATIAL POLICY 4 | REGENERATION PRIORITY PROGRAMME AREAS | Achieving sustainable development | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed (including current Indices of Multiple Deprivation and priority neighbourhoods), despite being considered up-to-date and in conformity with NPPF. | |
| CS 2014 | SPATIAL POLICY 5 | AIRE VALLEY LEEDS URBAN ECO-SETTLEMENT | Plan-making | Yes (potentially as part of consideration of SP4) Policy SP5 acts as strategic acknowledgement of the importance of the Aire Valley as a major area of development in Leeds but is implemented by the AVLAAP. | |
| CS 2014 | SPATIAL POLICY 8 | ECONOMIC DEVELOPMENT PRIORITIES | Building a strong, competitive economy | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF. | Consider as part of the Local Plan Update. |

| LEEDS LOCAL PLAN DOCUMENT | POLICY REF. | POLICY TITLE | NPPF TOPIC | Consider updating | Recommendation |
|---|---|---|---|---|---|
| CS 2014 | SPATIAL POLICY 9 | PROVISION FOR OFFICES, INDUSTRY AND WAREHOUSE EMPLOYMENT LAND AND PREMISES | Building a strong, competitive economy | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF. | |
| CS 2014 | SPATIAL POLICY 10 | GREEN BELT | Protecting Green Belt land | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| CS 2014 | SPATIAL POLICY 11 | TRANSPORT INFRASTRUCTURE INVESTMENT PRIORITIES | Promoting sustainable transport | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF. | Consider as part of the Local Plan Update. |
| CS 2014 | SPATIAL POLICY 12 | MANAGING THE GROWTH OF LEEDS BRADFORD INTERNATIONAL AIRPORT | Promoting sustainable transport | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF. | |
| CS 2014 | SPATIAL POLICY 13 | STRATEGIC GREEN INFRASTRUCTURE | Conserving and enhancing the natural environment | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF. | |
| CS 2014 | POLICY CC1 | CITY CENTRE DEVELOPMENT | Ensuring the vitality of town centres | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF. | Consider as part of the Local Plan Update. |
| CS 2014 | POLICY CC2 | CITY CENTRE SOUTH | Ensuring the vitality of town centres | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF | |
| CS 2014 | POLICY CC3 | IMPROVING CONNECTIVITY BETWEEN THE CITY CENTRE AND NEIGHBOURING COMMUNITIES | Ensuring the vitality of town centres | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF | |
| CS 2014 | POLICY H1 | MANAGED RELEASE OF SITES | Delivering a sufficient supply of homes | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| CS 2014 | POLICY H2 | NEW HOUSING DEVELOPMENT ON NON ALLOCATED SITES | Delivering a sufficient supply of homes | No. Considered up-to-date and in conformity with NPPF. | |

| LEEDS LOCAL PLAN DOCUMENT | POLICY REF. | POLICY TITLE | NPPF TOPIC | Consider updating | Recommendation |
|---|---|---|---|---|---|
| CS 2014 | POLICY H3 | DENSITY OF RESIDENTIAL DEVELOPMENT | Making effective use of land | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| CS 2014 | POLICY H4: | HOUSING MIX | Delivering a sufficient supply of homes | No. Considered up-to-date and in conformity with NPPF. | |
| CS 2014 | POLICY H6 | HOUSES IN MULTIPLE OCCUPATION (HMOS), STUDENT ACCOMMODATION AND FLAT CONVERSIONS | Delivering a sufficient supply of homes | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF. | Consider as part of the Local Plan Update |
| CS 2014 | POLICY H7 | ACCOMMODATION FOR GYPSIES, TRAVELLERS AND TRAVELLING SHOW PEOPLE | Gypsies and travellers | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| CS 2014 | POLICY H8 | HOUSING FOR INDEPENDENT LIVING | Delivering a sufficient supply of homes | No. Considered up-to-date and in conformity with NPPF. | |
| CS 2014 | POLICY EC1 | GENERAL EMPLOYMENT LAND | Building a strong, competitive economy | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF. | Consider as part of the Local Plan Update. |
| CS 2014 | POLICY EC2 | OFFICE DEVELOPMENT | Building a strong, competitive economy | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF See SP9 | |
| CS 2014 | POLICY EC3 | SAFEGUARDING EXISTING EMPLOYMENT LAND AND INDUSTRIAL AREAS | Building a strong, competitive economy | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF | |
| CS 2014 | POLICY P1 | TOWN AND LOCAL CENTRE DESIGNATIONS | Ensuring the vitality of town centres | No. There is a minor reference update required (minor modification) | Minor Mod/ Review again in 5 years |
| CS 2014 | POLICY P2 | ACCEPTABLE USES IN AND ON THE EDGE OF TOWN CENTRES | Ensuring the vitality of town centres | Yes. Consider superseding, as it is simply a list of town centre uses, despite being considered up-to-date and in conformity with NPPF | Consider as part of the Local Plan Update. |

| LEEDS LOCAL PLAN DOCUMENT | POLICY REF. | POLICY TITLE | NPPF TOPIC | Consider updating | Recommendation |
|---|---|---|---|---|---|
| CS 2014 | POLICY P3 | ACCEPTABLE USES IN AND ON THE EDGE OF LOCAL CENTRES | Ensuring the vitality of town centres | Yes. As Policy P2, consider superseding first part of policy. Need to consider updating second part of policy to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF | Consider as part of the Local Plan Update. |
| CS 2014 | POLICY P4 | SHOPPING PARADES AND SMALL SCALE STAND ALONE FOOD STORES SERVING LOCAL NEIGHBOURHOODS AND COMMUNITIES | Ensuring the vitality of town centres | Yes. Consider superseding, despite being considered up-to-date and in conformity with NPPF, as it doesn't go beyond what other polices say. | |
| CS 2014 | POLICY P5 | APPROACH TO ACCOMMODATING NEW FOOD STORES ACROSS LEEDS | Ensuring the vitality of town centres | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF | |
| CS 2014 | POLICY P6 | APPROACH TO ACCOMMODATING NEW COMPARISON SHOPPING IN TOWN AND LOCAL CENTRES | Ensuring the vitality of town centres | Yes. Consider superseding, despite being considered up-to-date and in conformity with NPPF, as it doesn't go beyond what other polices say. | |
| CS 2014 | POLICY P7 | THE CREATION OF NEW CENTRES | Ensuring the vitality of town centres | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| CS 2014 | POLICY P8 | SEQUENTIAL AND IMPACT ASSESSMENTS FOR MAIN TOWN CENTRE USES* | Ensuring the vitality of town centres | No. There is a minor reference update required (part D) (minor modification) | Minor Mod/ Review again in 5 years |
| CS 2014 | POLICY P9 | COMMUNITY FACILITIES AND OTHER SERVICES | Promoting healthy and safe communities | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible despite being considered up-to-date and in conformity with NPPF. | Consider as part of the Local Plan Update. |
| CS 2014 | POLICY P10 | DESIGN | Achieving well-designed places | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible despite being considered up-to-date and in conformity with NPPF. | |

| LEEDS LOCAL PLAN DOCUMENT | POLICY REF. | POLICY TITLE | NPPF TOPIC | Consider updating | Recommendation |
|---|---|---|---|---|---|
| CS 2014 | POLICY P11 | CONSERVATION | Conserving and enhancing the historic environment | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible despite being considered up-to-date and in conformity with NPPF. Minor modification for wording update. Opportunity to rationalise relevant UDP policies. | Consider as part of the Local Plan Update. |
| CS 2014 | POLICY P12 | LANDSCAPE | Achieving well-designed places | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| CS 2014 | POLICY T1 | TRANSPORT MANAGEMENT | Promoting sustainable transport | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible despite being considered up-to-date and in conformity with NPPF. | Consider as part of the Local Plan Update. |
| CS 2014 | POLICY T2 | ACCESSIBILITY REQUIREMENTS AND NEW DEVELOPMENT | Achieving well-designed places | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible despite being considered up-to-date and in conformity with NPPF. | |
| CS 2014 | POLICY G1 | ENHANCING AND EXTENDING GREEN INFRASTRUCTURE | Conserving and enhancing the natural environment | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible despite being considered up-to-date and in conformity with NPPF. | |
| CS 2014 | POLICY G2 | CREATION OF NEW TREE COVER | Conserving and enhancing the natural environment | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence is refreshed, despite being considered up-to-date and in conformity with NPPF. | |
| CS 2014 | POLICY G3 | STANDARDS FOR OPEN SPACE, SPORT AND RECREATION | Promoting healthy and safe communities | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| CS 2014 | POLICY G7 | CEMETERIES AND BURIAL SPACE | Conserving and enhancing the natural environment | No. Considered up-to-date and in conformity with NPPF. | |
| CS 2014 | POLICY G8 | PROTECTION OF IMPORTANT SPECIES AND HABITATS | Conserving and enhancing the natural environment | No. Minor modification required in terminology | Minor Mod/ Review again in 5 years |

| LEEDS LOCAL PLAN DOCUMENT | POLICY REF. | POLICY TITLE | NPPF TOPIC | Consider updating | Recommendation |
|---|---|---|---|---|---|
| CS 2014 | POLICY G9 | BIODIVERSITY IMPROVEMENTS | Conserving and enhancing the natural environment | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible despite being considered up-to-date and in conformity with NPPF. | Consider as part of the Local Plan Update. |
| CS 2014 | POLICY EN1 | CLIMATE CHANGE – CARBON DIOXIDE REDUCTION | Meeting the challenge of climate change & flooding | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible despite being considered up-to-date and in conformity with NPPF. | |
| CS 2014 | POLICY EN3 | LOW CARBON ENERGY | Meeting the challenge of climate change & flooding | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible despite being considered up-to-date and in conformity with NPPF. | Consider as part of the Local Plan Update. |
| CS 2014 | POLICY EN5 | MANAGING FLOOD RISK | Meeting the challenge of climate change & flooding | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible despite being considered up-to-date and in conformity with NPPF. A new SFRA needs to be undertaken. | Consider as part of the Local Plan Update. |
| CS 2014 | POLICY EN6 | STRATEGIC WASTE MANAGEMENT | NPPW | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| CS 2014 | POLICY EN7 | MINERALS | Facilitating the sustainable use of minerals | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF. | Consider as part of the Local Plan Update. |
| CS 2014 | POLICY ID1 | IMPLEMENTATION AND DELIVERY MECHANISMS | Plan-making | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF | Consider as part of the Local Plan Update. |
| CS 2014 | POLICY ID2 | PLANNING OBLIGATIONS AND DEVELOPER CONTRIBUTIONS | decision-making | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| NRWDPD Jan 2013 Rev 2015 | GENERAL POLICY 1 | | Achieving sustainable development | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| NRWDPD Jan 2013 Rev 2015 | MINERALS 1 | PROVISION OF AGGREGATES | Facilitating the sustainable use of minerals | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF | Consider as part of the Local Plan Update. |

| LEEDS LOCAL PLAN DOCUMENT | POLICY REF. | POLICY TITLE | NPPF TOPIC | Consider updating | Recommendation |
|---|---|---|---|---|---|
| NRWDPD Jan 2013 Rev 2015 | MINERALS 2 | MINERAL SAFEGUARDING AREAS - SAND AND GRAVEL | Facilitating the sustainable use of minerals | See Minerals 1. Any change in targets may require reassessment of safeguarded sites. | Consider as part of the Local Plan Update. |
| NRWDPD Jan 2013 Rev 2015 | MINERALS 3 | MINERAL SAFEGUARDING AREAS - SURFACE COAL | Facilitating the sustainable use of minerals | See Minerals 1. Any change in targets may require reassessment of safeguarded sites. | |
| NRWDPD Jan 2013 Rev 2015 | MINERALS 4 | SAFEGUARDED EXISTING MINERAL EXTRACTION SITES | Facilitating the sustainable use of minerals | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF | |
| NRWDPD Jan 2013 Rev 2015 | MINERALS 5 | MINERAL EXTRACTION - SAND AND GRAVEL - AREA OF SEARCH | Facilitating the sustainable use of minerals | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF | |
| NRWDPD Jan 2013 Rev 2015 | MINERALS 6 | LIMITING SAND AND GRAVEL EXTRACTION IN THE WHARFE VALLEY | Facilitating the sustainable use of minerals | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF | |
| NRWDPD Jan 2013 Rev 2015 | MINERALS 7 | PREFERRED AREAS - STONE AND CLAY EXTRACTION | Facilitating the sustainable use of minerals | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF | |
| NRWDPD Jan 2013 Rev 2015 | MINERALS 8 | PROVISION OF STONE FOR REPAIRS AND REFURBISHMENT OF EXISTING BUILDINGS | Facilitating the sustainable use of minerals | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| NRWDPD Jan 2013 Rev 2015 | MINERALS 9 | APPLICATIONS FOR MINERAL DEVELOPMENT | Facilitating the sustainable use of minerals | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF | Consider as part of the Local Plan Review |
| NRWDPD Jan 2013 Rev 2015 | MINERALS 10 | RESTORATION OF MINERAL SITES | Facilitating the sustainable use of minerals | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| NRWDPD Jan 2013 Rev 2015 | MINERALS 11 | AFTERCARE OF RESTORED PROPOSALS | Facilitating the sustainable use of minerals | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |

| LEEDS LOCAL PLAN DOCUMENT | POLICY REF. | POLICY TITLE | NPPF TOPIC | Consider updating | Recommendation |
|---|---|---|---|---|---|
| NRWDPD Jan 2013 Rev 2015 | MINERALS 12 | SAFEGUARDED MINERAL PROCESSING SITES | Facilitating the sustainable use of minerals | No. Considered up-to-date and in conformity with NPPF. | |
| NRWDPD Jan 2013 Rev 2015 | MINERALS 13 | TRANSPORT MODES | Facilitating the sustainable use of minerals | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| NRWDPD Jan 2013 Rev 2015 | MINERALS 14 | CRITERIA FOR ASSESSING ALTERNATIVE DEVELOPMENT ON PROTECTED WHARVES AND RAIL SIDINGS | Facilitating the sustainable use of minerals | No. Considered up-to-date and in conformity with NPPF. | |
| NRWDPD Jan 2013 Rev 2015 | WASTE 1 | SELF SUFFICIENCY FOR FUTURE WASTE MANAGEMENT IN LEEDS | NPPW | No. Considered up-to-date and in conformity with NPPF. | |
| NRWDPD Jan 2013 Rev 2015 | WASTE 2 | SAFEGUARDING EXISTING WASTE MANAGEMENT CAPACITY | NPPW | No. Considered up-to-date and in conformity with NPPF. | |
| NRWDPD Jan 2013 Rev 2015 | WASTE 3 | A CITY WIDE NETWORK OF WASTE MANAGEMENT SITES AND FACILITIES | NPPW | No. Considered up-to-date and in conformity with NPPF. | |
| NRWDPD Jan 2013 Rev 2015 | WASTE 4 | WASTE MANAGEMENT FACILITIES - PERMANENT USES | NPPW | No. Considered up-to-date and in conformity with NPPF. | |
| NRWDPD Jan 2013 Rev 2015 | WASTE 5 | WASTE USES WITHIN EXISTING INDUSTRIAL AREAS | NPPW | No. Considered up-to-date and in conformity with NPPF. | |
| NRWDPD Jan 2013 Rev 2015 | WASTE 6 | STRATEGIC WASTE MANAGEMENT SITES | NPPW | No. Considered up-to-date and in conformity with NPPF. | |
| NRWDPD Jan 2013 Rev 2015 | WASTE 7 | WASTE ALLOCATION | NPPW | No. Considered up-to-date and in conformity with NPPF. | |
| NRWDPD Jan 2013 Rev 2015 | WASTE 8 | WASTE PROPOSALS AT OTHER LOCATIONS | NPPW | No. Considered up-to-date and in conformity with NPPF. | |
| NRWDPD Jan 2013 Rev 2015 | WASTE 9 | WASTE MANAGEMENT FACILITIES - POTENTIAL ISSUES AND IMPACTS | NPPW | No. Considered up-to-date and in conformity with NPPF. | |

| LEEDS LOCAL PLAN DOCUMENT | POLICY REF. | POLICY TITLE | NPPF TOPIC | Consider updating | Recommendation |
|---|---|---|---|---|---|
| NRWDPD Jan 2013 Rev 2015 | WASTE 10 | LANDFILL | NPPW | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| NRWDPD Jan 2013 Rev 2015 | WASTE 11 | WASTE DISPOSAL: LANDFILL AND LANDRAISING SITES | NPPW | No. Considered up-to-date and in conformity with NPPF. | |
| NRWDPD Jan 2013 Rev 2015 | ENERGY 1 | LARGE SCALE WIND ENERGY GENERATION | Meeting the challenge of climate change & flooding | No. Considered up-to-date and in conformity with NPPF. | |
| NRWDPD Jan 2013 Rev 2015 | ENERGY 2 | MICRO-GENERATION DEVELOPMENT | Meeting the challenge of climate change & flooding | No. Considered up-to-date and in conformity with NPPF. | |
| NRWDPD Jan 2013 Rev 2015 | ENERGY 3 | HEAT AND POWER ENERGY RECOVERY | Meeting the challenge of climate change & flooding | No. Considered up-to-date and in conformity with NPPF. | |
| NRWDPD Jan 2013 Rev 2015 | ENERGY 4 | HEAT DISTRIBUTION INFRASTRUCTURE | Meeting the challenge of climate change & flooding | No. Considered up-to-date and in conformity with NPPF. | |
| NRWDPD Jan 2013 Rev 2015 | AIR 1 | THE MANAGEMENT OF AIR QUALITY THROUGH DEVELOPMENT | Promoting healthy and safe communities | No. Considered up-to-date and in conformity with NPPF. | |
| NRWDPD Jan 2013 Rev 2015 | WATER 1 | WATER EFFICIENCY | Meeting the challenge of climate change & flooding | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF | Consider as part of the Local Plan Update. |
| NRWDPD Jan 2013 Rev 2015 | WATER 2 | PROTECTION OF WATER QUALITY | Conserving and enhancing the natural environment | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| NRWDPD Jan 2013 Rev 2015 | WATER 3 | FUNCTIONAL FLOOD PLAIN | Meeting the challenge of climate change, flooding | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF | Consider as part of the Local Plan Update. |

| LEEDS LOCAL PLAN DOCUMENT | POLICY REF. | POLICY TITLE | NPPF TOPIC | Consider updating | Recommendation |
|---|---|---|---|---|---|
| NRWDPD Jan 2013 Rev 2015 | WATER 4 | DEVELOPMENT IN FLOOD RISK AREAS | Meeting the challenge of climate change, flooding | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| NRWDPD Jan 2013 Rev 2015 | WATER 5 | ZONES OF RAPID INUNDATION | Meeting the challenge of climate change, flooding | No. Considered up-to-date and in conformity with NPPF. | |
| NRWDPD Jan 2013 Rev 2015 | WATER 6 | FLOOD RISK ASSESSMENTS | Meeting the challenge of climate change, flooding | No. Considered up-to-date and in conformity with NPPF. | |
| NRWDPD Jan 2013 Rev 2015 | WATER 7 | SURFACE WATER RUN-OFF | Meeting the challenge of climate change, flooding | No. Considered up-to-date and in conformity with NPPF. | |
| NRWDPD Jan 2013 Rev 2015 | LAND 1 | CONTAMINATED LAND | Making effective use of land | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF | Consider as part of the Local Plan Update. |
| NRWDPD Jan 2013 Rev 2015 | LAND 2 | DEVELOPMENT AND TREES | Conserving and enhancing the natural environment | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF | Consider as part of the Local Plan Update. |
| UDP 2006 (SAVED) | GP1 | LAND USE AND THE PROPOSALS MAP | decision-making | No. Minor modification required in terminology | Minor Mod/ Review again in 5 years |
| UDP 2006 (SAVED) | GP5 | REQUIREMENT OF DEVELOPMENT PROPOSALS | decision-making | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF | Consider as part of the Local Plan Update. |

| LEEDS LOCAL PLAN DOCUMENT | POLICY REF. | POLICY TITLE | NPPF TOPIC | Consider updating | Recommendation |
|---|---|---|---|---|---|
| UDP 2006 (SAVED) | GP6 | UNIMPLEMENTED LOCAL PLAN PROPOSALS | Plan-making | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF<br>A range of site commitments and other improvements carried forward into the UDP from previous local plans. Those that have completed and or have become inappropriate are redundant. Others remain extant and relevant. Separate assessments have been made of all the individual commitments .Sites and designations that are relevant have already been carried forward into the Site Allocations Plan 2019. Other sites and designations that are no longer appropriate can be superseded. | Consider as part of the Local Plan Update. |
| UDP 2006 (SAVED) | N8 | URBAN GREEN CORRIDORS | Conserving and enhancing the natural environment | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| UDP 2006 (SAVED) | N9 | URBAN GREEN CORRIDORS AND DEVELOPMENT | Promoting healthy and safe communities | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Considered ineffective as policy intent covered by CS G1. Potential to supersede. | Consider as part of the Local Plan Update. |
| UDP 2006 (SAVED) | N11 | OPEN LAND IN BUILT UP AREAS | Conserving and enhancing the natural environment | Yes. Need to consider evidence base refresh. | |
| UDP 2006 (SAVED) | N14 | LISTED BUILDING AND PRESERVATION | Conserving and enhancing the natural environment | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology.<br>See also CS P11 | |
| UDP 2006 (SAVED) | N15 | LISTED BUILDINGS AND CHANGE OF USE | Conserving and enhancing the natural environment | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology.<br>See also CS P11 | |

| LEEDS LOCAL PLAN DOCUMENT | POLICY REF. | POLICY TITLE | NPPF TOPIC | Consider updating | Recommendation |
|---|---|---|---|---|---|
| UDP 2006 (SAVED) | N16 | LISTED BUILDINGS AND EXTENSIONS | Conserving and enhancing the natural environment | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology.<br>See also CS P11 | Consider as part of the Local Plan Update. |
| UDP 2006 (SAVED) | N17 | LISTED BUILDINGS CHARACTER AND APPEARANCE | Conserving and enhancing the natural environment | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology.<br>See also CS P11 | |
| UDP 2006 (SAVED) | N18A | CONSERVATION AREAS AND DEMOLITION | Conserving and enhancing the natural environment | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology.<br>See also CS P11 | |
| UDP 2006 (SAVED) | N18B | CONSERVATION AREAS AND DEMOLITION | Conserving and enhancing the natural environment | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology.<br>See also CS P11 | |
| UDP 2006 (SAVED) | N19 | CONSERVATION AREAS NEW BUILDINGS | Conserving and enhancing the natural environment | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology.<br>See also CS P11 | |
| UDP 2006 (SAVED) | N20 | CONSERVATION AREAS AND RETENTION OF FEATURES | Conserving and enhancing the natural environment | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology.<br>See also CS P11 | |
| UDP 2006 (SAVED) | N23 | DEVELOPMENT AND INCIDENTAL OPEN SPACE | Achieving well-designed places | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology.<br>See also CS P10. | |

| LEEDS LOCAL PLAN DOCUMENT | POLICY REF. | POLICY TITLE | NPPF TOPIC | Consider updating | Recommendation |
|---|---|---|---|---|---|
| UDP 2006 (SAVED) | N24 | DEVELOPMENT PROPOSALS NEXT TO GREEN BELT / CORRIDORS | Achieving well-designed places | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| UDP 2006 (SAVED) | N25 | DEVELOPMENT AND SITE BOUNDARIES | Achieving well-designed places | No. Considered up-to-date and in conformity with NPPF. | |
| UDP 2006 (SAVED) | N27 | VACANT SITES AND LANDSCAPING SCHEMES | Achieving well-designed places | No. Considered up-to-date and in conformity with NPPF. | |
| UDP 2006 (SAVED) | N28 | HISTORIC PARKS AND GARDENS | conserving and enhancing the natural environment | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. | Consider as part of the Local Plan Update. |
| UDP 2006 (SAVED) | N29 | SITES OF ARCHAEOLOGICAL IMPORTANCE | conserving and enhancing the natural environment | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. | |
| UDP 2006 (SAVED) | N32 | GREEN BELT AND THE PROPOSALS MAP | Protecting Green Belt land | Plan period has passed but policy considered to be upto date, in conformity with NPPF and relevant to decision making. Consider Minor Modification to terminology. | |
| UDP 2006 (SAVED) | N33 | DEVELOPMENT IN THE GREEN BELT | Protecting Green Belt land | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. | |
| UDP 2006 (SAVED) | N35 | DEVELOPMENT AND AGRICULTURAL LAND | conserving and enhancing the natural environment | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| UDP 2006 (SAVED) | N36 | CHANGE OF USE OF RURAL BUILDINGS | conserving and enhancing the natural environment | No. Considered up-to-date and in conformity with NPPF. | |

| LEEDS LOCAL PLAN DOCUMENT | POLICY REF. | POLICY TITLE | NPPF TOPIC | Consider updating | Recommendation |
|---|---|---|---|---|---|
| UDP 2006 (SAVED) | N37 | SPECIAL LANDSCAPE AREAS | conserving and enhancing the natural environment | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| UDP 2006 (SAVED) | N37A | DEVELOPMENT IN THE COUNTRYSIDE | conserving and enhancing the natural environment | No. Considered up-to-date and in conformity with NPPF. | |
| UDP 2006 (SAVED) | N39B | WATERCOURSES AND NEW DEVELOPMENT | Meeting the challenge of climate change, flooding | No. Considered up-to-date and in conformity with NPPF. | |
| UDP 2006 (SAVED) | N43 | INFORMAL OUTDOOR RECREATION | Promoting healthy and safe communities | Yes. Consider superseding as other CS G and UDP N33 policies cover policy intent. | Consider as part of the Local Plan Update. |
| UDP 2006 (SAVED) | T10A | SAFEGUARD FORMER RAIL LINES | Promoting sustainable transport | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| UDP 2006 (SAVED) | T16 | PARK AND RIDE FACILITIES | Promoting sustainable transport | No. Considered up-to-date and in conformity with NPPF. | |
| UDP 2006 (SAVED) | T17 | PARK AND RIDE SITES | Promoting sustainable transport | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshing, despite being considered up-to-date and in conformity with NPPF. | Consider as part of the Local Plan Update. |
| UDP 2006 (SAVED) | T20 | MAJOR HIGHWAY SCHEMES | Promoting sustainable transport | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshing, despite being considered up-to-date and in conformity with NPPF. Those schemes that have completed are redundant. | Consider as part of the Local Plan Update. |
| UDP 2006 (SAVED) | T29 | LORRY PARKING AND COACH LAYOVER | Promoting sustainable transport | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |

| LEEDS LOCAL PLAN DOCUMENT | POLICY REF. | POLICY TITLE | NPPF TOPIC | Consider updating | Recommendation |
|---|---|---|---|---|---|
| UDP 2006 (SAVED) | H14 | AFFORDABLE HOUSING IN RURAL AREAS | Delivering a sufficient supply of homes | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| UDP 2006 (SAVED) | E3A | RENEWAL OF PLANNING PERMISSIONS | Building a strong, competitive economy | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence refreshed, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. | Consider as part of the Local Plan Update. |
| UDP 2006 (SAVED) | E3B | UNIMPLEMENTED EMPLOYMENT ALLOCATIONS | Building a strong, competitive economy | | |
| UDP 2006 (SAVED) | E3C | COMMITTED EMPLOYMENT SITES | Building a strong, competitive economy | | |
| UDP 2006 (SAVED) | E4 | EMPLOYMENT ALLOCATIONS | Building a strong, competitive economy | | |
| UDP 2006 (SAVED) | LT3 | ATTRACTIONS AND FACILITIES IN THE CITY CENTRE | Building a strong, competitive economy | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. The policy is promotional in nature and adds little to the general statement referring to promoting the tourism industry set out in CS policy SP8. Consider superseding. | |
| UDP 2006 (SAVED) | LT4 | CULTURAL AND SPORTING FACILITIES LOCATIONS | Building a strong, competitive economy | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. | |
| UDP 2006 (SAVED) | LT5 | PURPOSE BUILT EXHIBITIONS. CONCERTS AND CONFERENCE FACILITIES | Building a strong, competitive economy | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. | |

| LEEDS LOCAL PLAN DOCUMENT | POLICY REF. | POLICY TITLE | NPPF TOPIC | Consider updating | Recommendation |
|---|---|---|---|---|---|
| UDP 2006 (SAVED) | LT5A | ELLAND ROAD FOOTBALL STADIUMS | Building a strong, competitive economy | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Parts of the area have been delivered which makes the policy redundant, however some areas of development potential remain. | Consider as part of the Local Plan Update. |
| UDP 2006 (SAVED) | LT5B | LEISURE AND TOURISM FACILITIES SITES | Building a strong, competitive economy | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Schemes that have completed and or have become inappropriate are redundant. | |
| UDP 2006 (SAVED) | LT6 | WATERWAYS CORRIDORS AND TOURISM | Building a strong, competitive economy | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Promotional policy, consider potential to supersede. | |
| UDP 2006 (SAVED) | LT6A | WATERWAYS AND LEISURE DEVELOPMENTS | Building a strong, competitive economy | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. | |
| UDP 2006 (SAVED) | LT6B | WATERWAYS AND PUBLIC RIGHTS OF WAY | Building a strong, competitive economy | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| UDP 2006 (SAVED) | R2 | PROPOSED AREA BASED INITIATIVES | Achieving sustainable development | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Some of the area priorities are covered by CS Policy SP4. | Consider as part of the Local Plan Update. |
| UDP 2006 (SAVED) | R3 | COMPULSORY PURCHASE ORDERS | Achieving sustainable development | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| UDP 2006 (SAVED) | CC2 | CITY CENTRE BOUNDARY AND POLICY AREA | Ensuring the vitality of town centres | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence refreshed, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. See CS CC1 and CC2. | Consider as part of the Local Plan Update. |

| LEEDS LOCAL PLAN DOCUMENT | POLICY REF. | POLICY TITLE | NPPF TOPIC | Consider updating | Recommendation |
|---|---|---|---|---|---|
| UDP 2006 (SAVED) | CC24 | BAD NEIGHBOUR AND LARGE SCALE INDUSTRIAL USES | Building a strong, competitive economy | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider superseding as policies such as GP5 can appropriately address amenity issues if a proposal were to come forward. | Consider as part of the Local Plan Update. |
| UDP 2006 (SAVED) | T30:14.2.7 | AIRPORT OPERATIONAL LAND BOUNDARY | Promoting sustainable transport | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| UDP 2006 (SAVED) | T30A | LEEDS / BRADFORD AIRPORT AND RELATED USES | Promoting sustainable transport | No. Considered up-to-date and in conformity with NPPF. | |
| UDP 2006 (SAVED) | T30B | AIRPORT PUBLIC SAFETY ZONES | Promoting sustainable transport | No. Considered up-to-date and in conformity with NPPF. | |
| UDP 2006 (SAVED) | T30C | AERODROME SAFEGUARDING AREA | Promoting sustainable transport | No. Considered up-to-date and in conformity with NPPF. | |
| UDP 2006 (SAVED) | RL1 | RURAL LAND NORTH OF THE RIVER WHARFE | Conserving and enhancing the natural environment | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. | Consider as part of the Local Plan Update. |
| UDP 2006 (SAVED) | BD2 | DESIGN AND SITING OF NEW BUILDINGS | Achieving well-designed places | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| UDP 2006 (SAVED) | BD3 | DISABLED ACCESS NEW BUILDINGS | Achieving well-designed places | | |
| UDP 2006 (SAVED) | BD4 | PLANT EQUIPMENT AND SERVICE AREAS | Achieving well-designed places | | |
| UDP 2006 (SAVED) | BD5 | AMENITY AND NEW BUILDINGS | Achieving well-designed places | | |
| UDP 2006 (SAVED) | BD6 | ALTERATIONS AND EXTENSIONS | Achieving well-designed places | | |

| LEEDS LOCAL PLAN DOCUMENT | POLICY REF. | POLICY TITLE | NPPF TOPIC | Consider updating | Recommendation |
|---|---|---|---|---|---|
| UDP 2006 (SAVED) | BD7 | SHOP FRONTS AND SECURITY MEASURES | Achieving well-designed places | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| UDP 2006 (SAVED) | BD8 | DESIGN AND LOCATION OF SIGNS | Achieving well-designed places | | |
| UDP 2006 (SAVED) | BD9 | PROJECTING AND ILLUMINATED SIGNS | Achieving well-designed places | | |
| UDP 2006 (SAVED) | BD10 | BANNERS AND TEMPORARY ADVERTISING | Achieving well-designed places | | |
| UDP 2006 (SAVED) | BD11 | BLINDS FORMS AND DESIGN | Achieving well-designed places | | |
| UDP 2006 (SAVED) | BD12 | ADVERTISEMENT HOARDINGS | Achieving well-designed places | | |
| UDP 2006 (SAVED) | BD14 | FLOODLIGHTING | Achieving well-designed places | | |
| UDP 2006 (SAVED) | BD15 | PUBLIC ART | Achieving well-designed places | | |
| UDP 2006 (SAVED) | BC7 | DEVELOPMENT IN CONSERVATION AREAS | conserving and enhancing the historic environment | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology.<br>See also CS P11. | Consider as part of the Local Plan Update. |
| UDP 2006 (SAVED) | BC8 | DEMOLITION OF BUILDINGS IN CONSERVATION AREAS | conserving and enhancing the historic environment | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology.<br>See also CS P11. | |
| UDP 2006 (SAVED) | LD1 | LANDSCAPING SCHEMES | Achieving well-designed places | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. | |

| LEEDS LOCAL PLAN DOCUMENT | POLICY REF. | POLICY TITLE | NPPF TOPIC | Consider updating | Recommendation |
|---|---|---|---|---|---|
| UDP 2006 (SAVED) | LD2 | NEW AND ALTERED ROADS | Achieving well-designed places | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. | Consider as part of the Local Plan Update. |
| UDP 2006 (SAVED) | ARC1 | SCHEDULED ANCIENT MONUMENTS | conserving and enhancing the historic environment | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. | |
| UDP 2006 (SAVED) | ARC4 | PRESERVATION OF CLASS I and II AREAS | conserving and enhancing the historic environment | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence refreshing, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. | |
| UDP 2006 (SAVED) | ARC5 | PLANNING DECISIONS AND CLASS I, II and III AREAS | conserving and enhancing the historic environment | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence refreshing, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. | |
| UDP 2006 (SAVED) | ARC6 | PRESERVATION BY RECORD | conserving and enhancing the historic environment | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence refreshing, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. | |
| UDP 2006 (SAVED) | ARC7 | HISTORIC LANDSCAPES | conserving and enhancing the historic environment | Yes. Consider superseding as policy aim not covered by NPPF. | |
| UDP 2006 (SAVED) | ARC8 | MANAGEMENT AGREEMENTS | conserving and enhancing the historic environment | Yes. Consider superseding as policy aim not covered by NPPF. | |
| UDP 2006 (SAVED) | GB2 | INFILLING THE GREENBELT | Protecting Green Belt land | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. | |

| LEEDS LOCAL PLAN DOCUMENT | POLICY REF. | POLICY TITLE | NPPF TOPIC | Consider updating | Recommendation |
|---|---|---|---|---|---|
| UDP 2006 (SAVED) | GB3 | CHANGE OF USE FOR A BUILDING OF HISTORIC OR ARCHITECTURAL INTEREST | Protecting Green Belt land | Yes. Consider superseding as UDP GB4 and GB9 cover intent of policy. | Consider as part of the Local Plan Update. |
| UDP 2006 (SAVED) | GB4 | CHANGE OF USE OF BUILDINGS | Protecting Green Belt land | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. | |
| UDP 2006 (SAVED) | GB7 | MAJOR DEVELOPED SITES IN THE GREEN BELT | Protecting Green Belt land | Yes. Consider superseding as policy aim not covered by NPPF. | |
| UDP 2006 (SAVED) | GB9 | REDEVELOPMENT OF BUILDINGS | Protecting Green Belt land | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. | |
| UDP 2006 (SAVED) | GB12 | RETAIL DEVELOPMENT IN THE GREEN BELT | Protecting Green Belt land | Yes. Consider superseding as policy intent covered by other parts of NPPF and CS retail policies. | |
| UDP 2006 (SAVED) | GB13 | STABLES AND EQUESTRIAN DEVELOPMENT | Protecting Green Belt land | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. | |
| UDP 2006 (SAVED) | GB17 | CRITERIA FOR AFFORDABLE HOUSING IN THE GREEN BELT | Protecting Green Belt land | Yes. Consider superseding as policy intent covered by UDP policy H14. | |
| UDP 2006 (SAVED) | GB19 | OUTDOOR SPORT AND RECREATION | Protecting Green Belt land | Yes. Consider superseding as policy intent covered by other CS G polices. | |
| UDP 2006 (SAVED) | GB20 | BUILDINGS FOR SPORT AND RECREATION | Protecting Green Belt land | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. | |

| LEEDS LOCAL PLAN DOCUMENT | POLICY REF. | POLICY TITLE | NPPF TOPIC | Consider updating | Recommendation |
|---|---|---|---|---|---|
| UDP 2006 (SAVED) | GB21 | HOLIDAY ACCOMMODATION | Protecting Green Belt land | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |
| UDP 2006 (SAVED) | GB22 | HOLIDAY ACCOMMODATION AND MINOR WORKS | Protecting Green Belt land | No. Considered up-to-date and in conformity with NPPF. | |
| UDP 2006 (SAVED) | GB23 | STORAGE OF CARAVANS IN THE GREEN BELT | Protecting Green Belt land | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. | Consider as part of the Local Plan Update. |
| UDP 2006 (SAVED) | GB24 | ALLOTMENT GARDENS IN THE GREEN BELT | Protecting Green Belt land | Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. | |
| UDP 2006 (SAVED) | GB25 | GARDEN EXTENSIONS INTO THE GREEN BELT | Protecting Green Belt land | No. Considered up-to-date and in conformity with NPPF. | Review again in 5 years |