

Report of the Chief Planning Officer

Report to Development Plan Panel

Date: 26th June 2015

Subject: Site Allocations Plan - Publication Draft

Are specific electoral Wards affected? If relevant, name(s) of Ward(s): All .	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Are there implications for equality and diversity and cohesion and integration?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Is the decision eligible for Call-In?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Does the report contain confidential or exempt information? If relevant, Access to Information Procedure Rule number: Appendix number:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Summary of main issues

1. The Leeds Core Strategy was adopted by the City Council on 12th November 2014 and takes forward the spatial and land use aspects of the Vision for Leeds, City Priority Plans and the Best Council Plan (in particular, Objective 2: to 'Promote sustainable and inclusive economic growth), in aspiring to be the 'Best City in the UK'. There are also links to the Council's breakthrough projects, including Housing Growth and Jobs for Young People. In reflecting these priorities, at its meetings on the 16th December 2014, 6th and 13th January 2015, Development Plan Panel have previously considered site proposals for the Site Allocations Plan (SAP) and Aire Valley Leeds Area Action Plan (AVLAAP) (relating to Housing, Employment, Retail and Green space). Executive Board at its meeting on 11th February, subsequently agreed that these site allocations proposals should form the basis of the preparation of Publication Draft Plans for the SAP and AVLAAP.
2. Following on from the report to the Development Plan Panel on 16th June, the focus of this report is the SAP Publication Draft Plan sections in relation to Housing, including phasing of development (and safeguarded land), sites suitable for Independent Living and sites for Gypsies Travellers and Travelling Showpeople.

Recommendation

3. Development Plan Panel is invited to consider the SAP Publication Draft Plan sections in relation to Housing: including site phasing (and safeguarded land), sites suitable for Independent Living and sites for Gypsies Travellers and Travelling Showpeople and to recommend to the Executive Board, that the Plan is agreed for Publication consultation.

1.0 Purpose of this Report

- 1.1 Following consideration by the Development Plan Panel, Executive Board on the 11th February agreed the proposed site allocations for the SAP and the AVLAAP, as a basis to prepare draft Publications Plans. The purpose of this report is to present the Housing section of the SAP Publication Draft Plan, including site phasing (and safeguarded land), sites suitable for Independent Living, sites for Gypsies Travellers and Travelling Show people, consistent with the overall requirements of the Core Strategy and the scope of the Plan. Members are therefore invited to consider these sections of the Draft Plan and to recommend that this is taken forward for consultation in due course. In order to see the material in context, the full Publication Draft Plan (including sections on Retail, Employment (with the exception of land at LBIA, which is due to be subject to further discussion at the 26th June meeting) and Green space, previously discussed at Development Plan Panel on 16th June) is attached to this report, together with, the draft Sustainability Appraisal (SA) of Policies and site assessments, together with accompanying Plans. This report will not have had time to make all changes to sites discussed at the meeting on 16th June – any changes agreed by panel both then, and today will need to be made and published in the papers for Executive Board in July.

2.0 Background Information

Context

- 2.1 Members will recall that reports were tabled at the 16th December 2014, 6th and 13th January 2015 Development Plan Panels (DPP), which noted that, the SAP and AVLAAP will form part of the Development Plan for Leeds: the Local Development Framework (LDF) (or 'Local Plan').
- 2.2 Following consideration of the proposed allocations at Executive Board on 11th February, there have been a number of updates and changes, which are identified in the relevant sections below. This is a consequence of further technical work and additional information being received and updates to information on sites with planning permission.

3.0 Main Issues

- 3.1 The National Planning Policy Framework (NPPF) requires the Council to have an up to date development plan, or 'Local Plan'. This needs to include both strategic policies and site specific allocations that put the policies into effect. The SAP is part of a process that must ultimately lead to the delivery of new development of an appropriate form and quality, alongside the necessary infrastructure.

Housing

Targets, existing supply and new allocations

- 3.2 The Publication Draft Plan has been prepared on the outcome of sites agreed in principle for allocation at Executive Board in February 2015. The housing target established in the adopted Core Strategy and the breakdown for the

eleven Housing Market Characteristic Areas (HMCAs) has been a focus of the Plan. Table 2, paragraph 2.31 in the draft Plan illustrates the overall distribution of supply and compares this to the targets. Overall, the targets are met and as the table shows, the shortfall in some HMCAs is made up for with an oversupply, mainly in the City Centre and Inner HMCAs. This approach is considered consistent with the overall strategy of the Core Strategy, including the focus on development in the Main Urban Area and Major Settlements, and brownfield targets. The figures in Table 1(below) for existing supply (identified sites) vary from the position at Executive Board because, as previously agreed with members, sites with planning permission have been updated to 5th April 2015. The new housing allocations plus the existing supply make up the total housing supply in each HMCA.

Strategic Housing Land Availability Assessment (SHLAA)

- 3.3 The SHLAA is an ongoing process and updated each year. It is an important part of the evidence base supporting the SAP as it sets out the deliverability of sites and assesses their capacity and potential completion rates during the Plan period. The SHLAA continually assesses new sites – mainly through planning applications on larger “windfall” sites. A small handful of new site submissions have been received since Executive Board in February and this small stream will likely continue up until Submission. The SAP must inevitably take decisions on sites at a single point in time, otherwise it will never be possible to reconcile all the different elements. Therefore, rather than report new sites on an ad hoc basis to members it is considered that such sites should be considered as part of the SHLAA 2015 conclusions and alongside representations made for other sites following the Publication Draft Plan public consultation stage. This means that all new suggestions will be considered in a consistent and fair manner at the same time. If subsequent changes were to be agreed by members through this process, there would need to be a further period of public consultation on proposed modifications to the plan, prior to submission, this would have implications for the overall timetable for, submission, examination and adoption.

Green Belt Review

- 3.4 Paragraph 2.33 explains the process of Green Belt review, which has informed the selection of sites agreed in principle at Executive Board. In addition, the UDP ‘Rural Land’ designation in Outer NE HMCA is to be designated as Green Belt, to ensure that this area of open countryside has the same level of protection as similar areas across the District.

Phasing

- 3.5 Paragraphs 2.36 to 2.39 explain the methodology for phasing development of housing sites. Members agreed this methodology at their meeting on 19th May 2015. The approach is to release sites which are more sequentially preferable i.e. support the delivery of the Core Strategy spatial priorities as set out in policies SP1 to SP10. The phasing approach addresses the need to strike a balance between ensuring an enduring 5 year supply of land, with sufficient choice and competition in the market for land with recognition that some sites are less sequentially preferable by virtue of their greenfield status, local highways impacts or local infrastructure requirements.

- 3.6 The phasing of individual sites (i.e. whether in Phase 1, 2 or 3) is identified in the Draft Plan under Policies HG1 and HG2 and listed under the site specific requirements for each site in section 3 for each HMCA. Members will recall that phases are not time limited but that the movement between phases will happen when the Council is no longer able to maintain a 5 year land supply and needs to supplement its deliverable pool of sites from the next phase in the Plan period. In certain circumstances it has been necessary to alter the phase of a site given factors such as highway infrastructure, the spread of an individual settlement's sites across the phases and the ability of some sites, in policy terms, to be developed at any time in spite of being theoretically phased later. These sites are:

Table1: Phase Changes

HG2-150 (1220A)	Churwell (land to the east of) LS27	Moved from Phase 1 to Phase 2 due to highways concerns
HG2-149 (1282)	Lane Side Farm, PAS Morley	Moved from Phase 1 to Phase 2 due to highways concerns
HG2-182 (129A)	Main Street and Pitfield Road, Carlton,	Highways requirement to merge site HG2-182 with site HG1-410 (507) (which is a current UDP Phase 1 housing allocation)
HG2-26 (15)	Wetherby Road - Scarcroft Lodge, Scarcroft	Changed to Phase 1 - a major developed site in the Green Belt could come forward at any time.
HG2-168 (3373A)	Haigh Wood, Ardsley	Moved from Phase 3 to Phase 2 to achieve a better phasing balance in the local settlement
HG2-169 (3373C)	Haigh Wood, Ardsley	Moved from Phase 3 to Phase 2 to achieve a better phasing balance in the local settlement
HG2-49 (3376)	Off Weetwood Avenue, Headingley, Leeds	Moved from Phase 2 to Phase 1 - enabling development
HG2-53 (4097)	Calverley Cutting / Leeds Liverpool Canal, Apperly Bridge	Moved from Phase 2 to Phase 1 - Changed due to relationship with adjoining site (1337)
HG2-167 (1143B_D)	Old Thorpe Lane (land at), Tingley	Moved from Phase 3 to Phase 1 as enabling development

Site requirements

- 3.7 Infrastructure required to deliver the development of the sites and the cumulative scale of development has been a major issue, arising from the Issues and Options consultation (Summer 2013) and members concerns. Paragraphs 2.52 to 2.54 of the Draft Plan explains the overall approach. In addition, Highways have carried out Transport Modelling of all allocations (employment and housing), which has also considered cross boundary highway network issues. The report 'Background Paper – Transport' is appended to this report and will form part of the Background Paper on Infrastructure, which will be made available at Executive Board (see para 4.1 below on Background Papers). Children's Services previously reported on school needs arising from the proposed allocations, and sites and allocations for land to be reserved for school provision are outlined in the Plan (see para 3.10 below). This report was previously considered by Development Plan Panel and Executive Board, so is not repeated here, but will form part of the

Background Paper on Infrastructure (which is currently being finalised), to be made available at Executive Board in July. In addition to the infrastructure and site requirements which apply generically across all sites, where there are any specific site requirements that need to be taken into account in developing a site, these are detailed within section 3 for each HMCA concerned. Clearly, this is a strategic document and as a consequence does not reflect the level of detail that would be required at planning application stage.

Safeguarded land

3.8 The draft Plan designates land to the equivalent of 6,655 housing units as safeguarded for longer term development needs beyond the plan period, 2028. Executive Board endorsed the sites to be designated as safeguarded, and there is no change to the number of sites (see paragraph 2.60 of the draft Plan). Two sites in Aireborough have been extended so as not to leave an 'island' of Green Belt. These sites are shown at Appendix 1 of this report. They are:

- HG3-1: Ings Lane, Guiseley – additional 24 added to capacity
- HG3-2: Land east of Park Mills, Leeds Road, Rawdon – additional 20 added to capacity

Sites for Older Persons Housing/ Independent Living

3.9 A report on sites for older persons housing/Independent Living was presented to Development Plan Panel on 19th May. Within the context of Core Strategy Policy H4 (Housing Mix), the scope of the approach set out and agreed in the report, was to identify suitable sites within accessible locations within 400m of Local Centres. Arising from this approach, Policy HG4 applies to the sites shown as being suitable for this use. All sites falling within Policy HG4 are listed under that Policy in section 3 for each HMCA concerned and identified on the Plan, as well as listed in the site specific requirements for new allocations.

Sites reserved for school use

3.10 Where part of a housing allocation needs to provide land for a school, this is detailed under the site specific requirements in section 3 for each HMCA. Section 3 also lists all sites (identified and allocated) where school provision is required. In addition, some sites are to be reserved for school use on land that is not also allocated for housing. Policy HG5 applies to such sites. Two sites reserved for school use are in current UDP Green Belt – site HG5-1 and HG5-7, and one is within a safeguarded land designation (HG5-8). On the Plan at present these sites are shown as hatched yellow, but a specific boundary will need to be applied to the three sites listed, as otherwise land (currently Green Belt or PAS) could be at risk of development for housing or other uses. Hence there will be suggested changes to the Green Belt boundary/safeguarded land boundary respectively regarding these sites which will be presented to Executive Board.

Sites for Gypsies and Travellers and Travelling Show people

- 3.11 The Plan sets out the approach to meeting the needs identified in the Core Strategy for Gypsies and Travellers and Travelling Showpeople. Members were updated on the approach to identifying sites at their meeting on 19th May 2015, where the benefits of safeguarding existing Gypsy and Traveller sites which were long term encampments of between 1 and 3 pitches was set out. These sites total 11 pitches and Members agreed that in the absence of any suitable site submissions for private pitches the Core Strategy Policy H7 would be used to determine planning applications for such sites. Such sites are safeguarded under Policy HG6.
- 3.12 There is a need for 25 publicly managed pitches and the Plan sets out a series of sites to provide for 24 pitches. Officers will continue to explore opportunities to meet the need in full prior to the Submission of the SAP and will update Members. One of the proposed allocations is the temporary site at Kidacre Street, City and Hunslet. Policy HG6 safeguards this site and also highlights that there is potential for it to be expanded to help address pitch needs for the plan period by a minimum of 3 pitches. This is dependent on the removal of gas holders by Northern Gas Networks and the Council will work closely with them to pursue this option. Ward Members (where the proposed sites are situated) have also been made aware via a series of briefings of a range of proposed sites where the Council has an obligation to accommodate pitches on its own land and under its own management. The outcome of briefings with relevant ward members will be verbally reported at the Panel meeting.
- 3.13 There is also a need for 9 negotiated stopping sites which are publically managed. These sites are not identified in the SAP. Rather they will be identified on an ongoing operational management basis by Environment and Housing. This will be done following discussions with other Council services and via ongoing engagement with Members on a rolling basis e.g. using opportunity sites on a temporary basis. These sites will form a pool from which alternatives to unauthorised encampments by Gypsies with a reason to stop in Leeds can be offered temporary accommodation. This approach will be managed by Neighbourhoods and Housing and is fully supported by Leeds GATE, the local Gypsy advocacy group as a pragmatic means of dealing with temporary visitors to Leeds without permanently affecting specific neighbourhoods. Appendix 2 provides further details on the process for selecting sites for Gypsies, Travellers and Travelling Show People.

Housing Proposals within the Housing Market Characteristic Areas (HMCAs)

- 3.14 Section 3 of the draft Plan outlines the specific sites identified or allocated for housing, along with sites designated as safeguarded land sites suitable for older persons/Independent Living and sites reserved for school use and for Gypsy and Traveller provision, (where applicable). Appendix 1 details any material changes made to sites since Executive Board approved the sites in principle.

Issues of Clarification

- 3.15 In addition to the changes raised above, there are also issues of clarification that need to be raised with Members to correct earlier errors. It was reported to Development Plan Panel on the 20th May 2015 (paragraph 3.18), that the Headley Hall Site (3391) consisted of 62% Grade 3a, 19% Grade 2 and 14% Grade 3b, in terms of agricultural land classification. This was reported in error. The figures are: 6.5% Grade 1, 42.53% Grade 2, 0.42% Grade 3, 25.75% Grade 3a, 24.71% Grade 3b.

4.0 Other considerations:

Background Papers

- 4.1 In assisting the consultation process, providing further information and evidence for the draft Plan, a number of Background Papers are in the process of being finalised. These will be available as Background papers presented to Executive Board in July 2015. They will form part of the documents available for comment during the public consultation on the Publication Draft Plan and include:

Background Paper: Retail

Background Paper: Employment

Background Paper: Green space

Background Paper: Housing

Background Paper: Green Belt Review

Background Paper: Infrastructure (the 'Transport' element of which is appended to this report)

Background Paper: Flood Risk Sequential Test

Background Paper: Duty to Co-operate

Background Paper: Environmental designations (tbc)

- 4.2 These Background Papers will help to provide an overview of the Plan preparation process, from scoping the plan, through Issues and Options, to Publication Draft Plan stage and include all sites rejected for allocation for retail, employment, housing or green space. The Background Paper on Infrastructure will include an update on the Core Strategy Infrastructure Delivery Plan and the Community Infrastructure Levy (CIL), the detail on Schools Provision which was appended to Development Plan Panel (January 2015) and Executive Board (February 2015) respectively and is therefore not repeated in the papers today.

Sustainability Appraisal

- 4.3 As outlined in this report, the Core Strategy provides the overall strategic context for the preparation of the SAP. Proposals contained in this Plan, therefore need to be consistent with the overall approach of the Core Strategy, which in itself has been subject to a Sustainability Appraisal and was considered to be Inspector, who found the Plan and supporting City Council evidence to be sound.
- 4.4 The purpose of the Sustainability Appraisal (SA) is to assess a document or plan against the delivery of social, economic and environmental objectives. This is a requirement of the Strategic Environmental Assessment (SEA)

Directive, which was transposed into English Law in the form of The Environmental Assessment of Plans and Programmes Regulations 2004.

- 4.5 The SA of the SAP assesses the effects of the site allocations against the SA objectives and consideration of alternative site options. An SA Report was prepared to accompany the Issues & Options document and was published as part of the consultation process in 2013. At that stage the SA Report provided an individual assessment of sites being considered for allocation for retail, employment and housing use with an expectation that the SA at the Publication draft would consider the cumulative effects of the proposed site allocations coming forward collectively. In relation to this Panel meeting, members need to take into account the SA conclusions in relation to Housing and safeguarded land, the SA of Employment, Retail and Green space, were previously reported to members at the 16th June meeting.

Work Undertaken Since Consultation on the Issues & Options SAP

- 4.6 Following the Issues & Options consultation in Summer 2013, further work has been undertaken to progress the Sustainability Appraisal of the SAP. This has included:
- Completing site assessments following receipt of outstanding site information from consultees and infrastructure providers;
 - Undertaking site assessments of new sites submitted during the Issues & Options consultation and subsequently through the Strategic Housing Land Availability Assessment (SHLAA) process;
 - Reviewing and revising the scoring criteria used for assessing sites against the SA objectives, for example as a result of consultee comments, checking for consistency introducing new evidence sources and making scoring easier to understand;
 - All of the SA assessments have been moved onto the SAP database, enabling improved data application and analysis;
 - Updating and expanding the baseline data so the information is presented at a City wide and HMCA level;
 - Updating the summary of plans, policies and programmes relevant to the SAP at a European, national and local level;
 - Summarising the SA effects of the SAP based on the proposed allocations presented in the Publication draft;
 - Identifying mitigation measures to offset negative effects identified through the SA process.
 - Assessing the proposed SAP policies against SA objectives

SA Report

- 4.7 Following the work undertaken as outlined in paragraph 4.6 above an SA Report has been prepared to accompany the SAP Publication draft, which will be subject to public consultation. One of the main differences from the SA Report prepared for the Issues & Options document is the assessment of the overall effects of the proposed allocations coming forward as a whole, i.e. the

cumulative effects and the identification of mitigation measures where negative effects are identified for individual sites or sites as a whole.

SA of sites for Gypsies & Travellers and Travelling Show People

- 4.8 Since the preparation of the of the Issues & Options document, officers have been assessing the suitability of potential sites for Gypsies & Travellers and Travelling Show People. Within this context, site assessments and an initial SA of potential sites has been undertaken but is yet to be finalised. Members will be updated on progress at the Panel meeting.

Other Outstanding Work for the Sustainability Appraisal

- 4.9 The SA Report and accompanying appendices is substantively complete. It has been a very complex process in coordinating material, assessments and supporting data and comments to finalise the whole document and has been dependent on the resources of other officers in the Council and external consultees. There is some outstanding material to complete in relation to the baseline data in SA5 of the SA Report (green space provision city wide and for each HMCA and demographic information for each HMCA) and there are some gaps in relation to the individual assessment of sites against SA objective 10 (access to green space) in Appendix 7 and 8 of the SA Report. In addition, subject to members further consideration of the LBIA 'employment hub' proposal, this site with need a site assessment and SA, to reflect the process outlined above.

How has the SA informed the Site Allocations Process?

- 4.9 The SA process has been undertaken alongside the production of the SAP. Work on the SA started in early 2012 and has continued through to the preparation of the Publication draft document. The assessment work for the SA has been informed by evidence provided from a number of data sources and consultees both within and external to the Council. This has informed the assessment of sites on for example, transport and accessibility, flood risk, pollution, and natural resources and waste. This information has been used to consider the suitability of sites for the proposed use. It has also identified where mitigation measures would be needed to offset negative impacts identified through the SA process or further assessment work needed at planning application stage, such as detailed ecological assessment, flood risk measures or consideration of effects on the historic environment. This is reflected in the site requirements identified for proposed allocations.

Habitats Regulations Assessment (HRA) Screening

- 4.10 In reflecting the requirements of Article 6.3 of the Habitats Directive 92/43/EEC, a draft Screening Assessment has been carried out to determine if the Policies of the Leeds Site Allocations Plan (SAP) and Aire Valley Leeds Area Action Plan (AVLAAP) documents require an Appropriate Assessment, under the Habitats Regulations (Conservation of Habitats and Species Regulations 2010, SI no. 2010/490). It should be noted that a HRA Screening of the Core Strategy has previously been undertaken and a number of amendments to Policy wording were made, to strengthen the reference to the management of any adverse impacts upon Special Protection Areas (SPAs) and Special Area of Conservation (SAC).

- 4.11 Following the preparation of the initial a draft HRA Screening Assessment for the AVLAAP and SAP, an initial response from Natural England has now been received. In response to these comments, further technical work is being undertaken by officers to address the issues raised. In the main these comments relate to the need to updating and the presentation of technical information, further analysis of any potential recreational impacts on the South Pennine Moors (arising from SAP housing allocations) and their mitigation by recreational opportunities within Leeds MD. At the time of preparing this report this technical work was still underway, members will therefore be updated on progress at the DPP meeting.

Duty to Co-operate

- 4.12 The Localism Act (2011) and the National Planning Policy Framework (March 2012), provides details of legal and soundness requirements that the Council and other public bodies have to satisfy. This includes a 'duty to cooperate' on planning issues that cross administrative boundaries, especially those that relate to strategic priorities and allocations set out as part of the Core Strategy and related Development Plan Documents (including the homes and jobs planned for). The SAP (and AVLAAP) has been prepared within the context of the adopted Leeds Core Strategy. In finding the Core Strategy sound, the Inspector confirmed that the City Council had demonstrated compliance with the Duty to Co-operate requirements. Within the context of the preparation of the SAP, the broad strategic approach and quantum of development have therefore been accepted through the Duty to Co-operate process. Any further issues, relating to detailed matters set out in the SAP are have been considered through the established Duty to Co-operate processes and via specific meetings with authorities directly adjacent to Leeds MD.
- 4.13 Following consideration by Development Plan Panel and Executive Board, in January/February 2015 the City Council identified and agreed which sites should be proposed for allocation. At the February 2015 meeting of the LCR Strategic Planning Duty to Cooperate Group, Leeds officers presented maps and tables of proposed allocations that fit the criteria previously agreed through the DtC process, to target the consideration of individual sites. These sites concerned housing and employment allocations on corridors identified in Leeds' Core Strategy Duty to Cooperate Background Paper and housing sites of 100+ dwellings within 500m of a local authority boundary. These included also very large sites, such as East of Garforth. The lists were categorised by the relevant adjacent local authority. Where sites were close to boundaries of more than one adjoining authority they were included on the list of both authorities. Authorities were invited to highlight those Leeds allocations they believed may generate issues of concern in their areas. They were also asked to highlight any proposals or sensitivities in their areas – for example housing allocations or historic monuments – that ought to be taken into account. The following meetings have subsequently taken place to consider the 'cross boundary' impacts:

5 th March 2015	Kirklees MBC
6 th March 2015	City of Bradford Council

11th March 2015 Harrogate BC, North Yorks CC, Selby DC, City of York Council
24th March 2015 Wakefield MDC

- 4.14 Overall, the meetings established that there are no sites where there is a fundamental objection to the principal of development. Where concerns were raised this was generally due to traffic generation and some raised impacts on local school capacities and attendance patterns. Cases were also identified where there will be a cumulative impact with proposals in neighbouring authorities. In all cases, options for mitigation are being explored.

5.0 Corporate Considerations

5.1 Consultation and Engagement

- 5.1.1 The Core Strategy has been found by an independent Inspector to be sound (this also includes compliance with the Duty to Co-operate and the regulated requirements for public consultation and engagement). Following independent examination, the Plan was subsequently adopted by the City Council in November 2014. Following on from the Core Strategy, there has been extensive public consultation on the SAP Issues & Options (June – July 2013) and members engagement in preparing the site allocation proposals and Draft Plan. Subject to consideration by Executive Board, a further stage of public consultation will take place in autumn 2015.

- 5.1.2 We are continuing to receive representations since Executive Board, February 2015, either objecting to proposed allocations or providing further supporting information on sites (to be allocated, or not proposed for allocation), or suggesting new sites (see para x above on new site submissions). Representations made are outside the statutory consultation process. All those who have made representations will be informed once the public consultation on the Publication Draft Plan commences, so they will have chance to further their representations through the formal process. Members of the public should note that their comments will have more weight if they submit them in the formal statutory consultation stage.

- 5.1.3 Within this overall context, the City Council has received a detailed submission from the Aireborough Neighbourhood Development Forum ('Aireborough Site Sustainability and Green Belt Purpose Reports'). This has been prepared as a basis to help inform the Aireborough Neighbourhood Plan and the SAP process. This information has been recently received and officers are in the process of preparing a response and will update members at the Panel meeting.

5.2. Equality and Diversity / Cohesion and Integration

- 5.2.1 In the preparation of the Core Strategy, due regard has been given to Equality, Diversity, Cohesion and Integration issues. This has included the completion of EDCI Screening of the Core Strategy and meeting the requirements of the Strategic Environmental Assessment Directive, which has meant that these Plans are subject to the preparation of a Sustainability

Appraisal. The purpose of such Appraisals is to assess (and where appropriate strengthen) the document's policies, in relation to a series of social (and health), environmental and economic objectives. As part of this process, issues of Equality, Diversity, Cohesion and Integration, are embedded as part of the Appraisal's objectives. The SAP material follows on and reflects the approach set out in the Core Strategy. Nevertheless, an Equality Impact Assessment Screening is being undertaken on the proposed site allocations and will be part of the package to be presented to Executive Board. Equality, diversity, cohesion and integration issues are being considered as part of the preparation of the plan and through the sustainability appraisal work which is ongoing.

5.3. Council Policies and City Priorities

5.3.1 The Core Strategy, the emerging SAP and AVLAAP, play a key strategic role in taking forward the spatial and land use elements of the Vision for Leeds and the aspiration to the 'the Best City in the UK'. Related to this overarching approach and in addressing a range of social, environmental and economic objectives, these Plans seek to implement key City Council priorities. These include the Best Council Plan (2013-17) (in particular Objective 2: to 'promote sustainable and inclusive economic growth') and Leeds Joint Health and Wellbeing Strategy (2013-2015).

5.4 Resources and value for money

5.4.1 The preparation of statutory Development Plan Documents is a necessary but a very resource intensive process. This is due to the time and cost of document preparation (relating to public consultation and engagement), the preparation and monitoring of an extensive evidence base, legal advice and Independent Examination. These challenges are compounded currently by the financial constraints upon the public sector and resourcing levels, concurrent with new technical and planning policy pressures arising from more recent legislation (including the Community Infrastructure Levy and Localism Act). There are considerable demands for officers, members and the community in taking the Development Plan process forward.

5.4.2 For the Local Development Framework to be as up to date as possible, the Council now needs to produce the SAP and AVLAAP as quickly as practicable, following the adoption of its Core Strategy. This will provide value for money in that the Council will influence and direct where development goes. Without an up to date plan the 'presumption in favour of sustainable development' by the Government means that any development in conformity with national policy will be acceptable, regardless of any previous positions of the authority, which could have implications in terms of resources and value for money.

5.5 Legal Implications, Access to Information and Call In

5.5.1 The SAP will follow the statutory Development Plan process (Local Development Framework). The report is not eligible for call in as no decision is being taken.

5.6 Risk Management

5.6.1 Without current allocations Plans for Leeds MD in place, aspects of the existing UDP allocations will become out of date and will not reflect or deliver the Core Strategy Policies and proposals (including District wide requirements for Housing and General Employment Land) or the requirements of national planning guidance. Early delivery is therefore essential, alongside the SAP, to enable the Council to demonstrate that sufficient land will be available when needed to meet the Core Strategy targets. Without an up to date plan the 'presumption in favour of sustainable development' by the Government means that any development or Neighbourhood Plan in conformity with national policy will be acceptable, regardless of any previous positions of the authority. The more the work progresses, the more material weight can be given to it.

6.0 **Conclusion**

6.1 The SAP has been prepared within the overall context of the adopted Core Strategy, emerging SAP and City Council priorities set out in the Best Council Plan. The draft Publication Plan seeks to reflect these commitments through the SAP, in identifying allocations and site requirements.

7.0 **Recommendation**

7.1 Development Plan Panel is invited to consider the SAP Publication Draft Plan sections in relation to Housing: including site phasing (and safeguarded land), sites suitable for Independent Living and sites for Gypsies Travellers and Travelling Showpeople and to recommend to the Executive Board, that the Plan is agreed for Publication consultation.

Appendices

Appendix 1- Specific Housing Issues

Appendix 2- Assessment of Gypsy and Traveller sites and Travelling Showpeople