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**Report of Chief Planning Officer**

**Report to Development Plan Panel**

**Date: 8<sup>th</sup> September 2020**

**Subject: Planning White Paper**

Are specific electoral wards affected? If yes, name(s) of ward(s): ALL	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Has consultation been carried out?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are there implications for equality and diversity and cohesion and integration?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Will the decision be open 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

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**Summary**

1. The Planning White Paper was published on 6th August 2020 for consultation until 29th October 2020. It has been heralded by the Government as the biggest overhaul of the planning system since it was first introduced in 1947.
2. This report is intended to give Members an understanding of the proposals in the White Paper and the potential implications for planning in Leeds. For each of the proposal topics officers raise matters that will require consideration for Members as part of the Council's consultation response. There are also particular comments on the potential implications for the Local Plan Update. The report is also an opportunity for Members to provide their own comments on the proposals.
3. As the White Paper has wide ranging implications not only for the main planning functions of plan making and dealing with planning applications, but also for related services of design, landscape, conservation, contaminated land, regeneration, housing services, asset management and public health, officers have undertaken discussion group sessions to ensure that wider implications and views are captured. This, together with Members comments, will be used

to produce a draft response, with the intention for this to be brought to DPP in October for endorsement.

4. The stated aim of the White Paper is to achieve a modernised and more streamlined planning system. Some of the key ideas include simplification and speeding up of plan making, so that only three land designations are made: growth, renewal and protection (with further details on this discussed within section 3.3 of this Report). There will be a national set of generic development management policies produced so that Local Plans will only include spatially specific policies and designations. The period for preparing plans will be a maximum of 30 months, with 6 months for calls for sites and suggestions, 12 months for evidence collating and plan writing, 3 months for submission and formal public consultation and 9 months for examination. The expectation is that public engagement with planning will be improved through the harnessing of the latest digital technology, standardised processes for planning application validation and making plans more visual and map orientated with less text, and viewing on multiple platforms including smart phones.
5. Some of the key questions arising from the White Paper relate to the current lack of detail on certain issues, an apparent reduction in elected member involvement in planning decisions and whether a front-loaded system will be capable of responding to the varied character of Leeds. Also, there are challenges in meeting the Government's desire for more detailed spatial plans, with increase public engagement, to be produced over a shorter time-frame.
6. At present, the implications for the Local Plan Update are unclear, given some lack of detail surrounding the proposals and uncertainty about when the new system would be in place. Further consideration may be necessary as to the benefits and risks of embarking on a plan update when a full scale plan under the new system may be required in a matter of years. However, there is also no guarantee that the final version of the planning system will fully reflect the current provisions of the White Paper. As such to change the Council's approach on meeting the climate emergency through the Local Plan Update on the basis of draft policy could unnecessarily limit the Council's ability to meet its aspirations for net zero carbon by 2030.

## **Recommendation**

Panel Members are asked to note and comment on the contents of the report.

## **1. Purpose of this report**

- 1.1 The purpose of this report is to give Members an early overview of proposals in the Government's White Paper on reform of the Planning System. For each of the proposal topics officers raise matters that may require consideration for Members as part of the Council's consultation response. There are also particular comments on the potential implications for the Local Plan Update. The report is also an opportunity for Members to provide their own comments on the proposals, in order to aid officers in preparing a draft response to the consultation, to be brought to DPP in October for endorsement.

## **2. Background information**

- 2.1 At the time of writing, officers are still in the process of understanding the implications of the White Paper proposals for different planning functions and other related services of the Council and putting together draft responses to the White Paper consultation questions (see list of question in Appendix 1). In order to better understand views of different services, the Council arranged a number of discussion sessions at the end of August with officers representing the main planning functions of plan making and development management as well as supporting and related services including design, landscape, conservation, contaminated land, regeneration, housing services, asset management and public health. The comments made about White Paper proposals in this report are initial and headline in nature, in order to aid DPP Members in their understanding of the proposals and to enable a discussion so Member comments can be captured, as part of the formal response. The deadline for comments is 29<sup>th</sup> October 2020.
- 2.2 The White Paper comes in addition to recent extensions to Permitted Development rights and changes to the Use Class Order which are designed to increase flexibility within the planning system by reducing the need for planning permission for certain types of development. Two new broad use classes have been created, one for commercial uses [Class E] that amalgamates retail (formerly A1), food & drink (A3), financial & professional services (A2), Indoor Sport (D2e), medical services (D1a), crèche/childcare (D1b) and office / research / light industry (B1) and another for Local Community & Learning [Class F] which includes a sub-class F1 covering education, museums, exhibition halls and law courts and another sub-class F2 covering small shops selling essentials, meeting places and outdoor sports facilities (including swimming pools). The Government has also continued to support the permitted development right which allows offices and other commercial buildings to be turned into apartments.

## **3. Main issues**

- 3.1 The White Paper "Planning for the Future" was published on 6<sup>th</sup> August 2020 with the stated intention of streamlining and modernising the planning system. Comments on the White Paper must be made by the 29<sup>th</sup> October 2020.
- 3.2 The White Paper sets out numbered proposals with explanatory text and a set of numbered consultation questions. It splits into three topic areas (referred to as Pillars):

- Planning for Development
- Beautiful and Sustainable Places
- Infrastructure and Connected Place

There is also a final section “Delivering Change” with suggestions on funding local authority planning services and non-compliance / enforcement. These topics do not have consultation questions.

### 3.3 Pillar 1: Planning for Development

3.3.1 In summary, this pillar puts forward proposals to front-load decision making toward plan making and design codes, and away from planning applications. Designation of areas for “growth” will mean permission is automatically granted in principle and design codes can provide parameters for scale, design and materials. Proposals are also advanced for speeding up plan making, introducing digital and visual technologies and the role of Neighbourhood Planning.

3.3.2 ***Proposal 1: The role of land use plans should be simplified.*** Plans should designate areas for either *Growth*, *Renewal* or *Protection*. Growth areas would cover land suitable for comprehensive development such as new settlements, urban extensions and urban regeneration sites. Renewal areas would cover existing built up areas where there is potential for densification and smaller scale development. Protection areas would cover areas such as Green Belt, Areas of Outstanding Natural Beauty (AONBs), Conservation Areas, Local Wildlife Sites, and areas of high flood risk. It would also cover domestic gardens. The White Paper also suggests that locally determined sub-areas may be designated within each category.

3.3.3 Development in Growth Areas would get automatic outline approval and planning applications would only need to resolve outstanding issues, not the principle of development. Development in Renewal Areas would be subject to a general presumption in favour of development. Development in Protection Areas would require planning applications, in a similar fashion to the existing system.

3.3.4 *Matters to consider in consultation response:* The sheer variety of communities and urban areas in Leeds means that designations may require a patchwork approach (including sub-areas) to capture the complexity of area needs. How the front loading of decision making into the plan making stage reflects the flexibility and responsiveness to market development interest as the current system, particularly in areas like the city centre, is a key matter for consideration as part of the Council’s consultation response.

3.3.5 In terms of the Local Plan Update, the White Paper proposals may require a comprehensive examination of how area designations for growth, renewal and protection (and possible sub-areas) can be used to advance current policy matters and Council priorities, such as the climate emergency, housing and employment supply, regeneration, town centre health and character of place.

3.3.6 ***Proposal 2: Development Management policies established at a national scale.*** The Government is promising to produce a national set of generic development management policies that should not be repeated in local plans.

Instead local plans should concentrate on site or area specific requirements. Design codes should be prepared in parallel with local plans setting out scales and parameters for development, either for the whole local authority area or sub-areas. The intention is that decisions on development proposals can be taken quickly, potentially in a binary machine readable way.

- 3.3.7 *Matters to consider in consultation response:* This proposal represents a significant shift in decision making towards the plan making stage. How issues of local democracy, community involvement, and how staff resources are used are major areas for consideration. In addition, it will be important to understand how national generic development management policies reflect local differences of circumstance.
- 3.3.8 In terms of the Local Plan Update, it is possible that an update of current plans may be overtaken by a need to adapt to a national set of development management policies. Further consideration may be given to the most effective route to progress policies to address the climate emergency, particularly around energy efficiency, green space, green infrastructure, renewable energy, active travel and sustainable patterns of growth.
- 3.3.9 ***Proposal 3: Replace the tests of soundness for Local Plans with a “sustainable development test” and a slimmed down assessment of “deliverability”.*** This is designed to speed up plan making. Separate consultation on replacement regimes for Sustainability Appraisal, Environmental Impact Assessment are promised for the autumn.
- 3.3.10 *Matters to consider in consultation response:* It will be important to consider how the “sustainable development test” ensures that sufficient consideration is given to environmental and other impacts.
- 3.3.11 ***Proposal 4: Review of the Standard Method for calculating housing requirements.*** It is proposed to retain an updated version of the Standard Method to calculate housing requirements rather than them being set by Local Authorities through local plans. In effect a “top-down” requirement would replace all locally set housing requirements. The updates to the method, which are subject to a separate current consultation (deadline 1<sup>st</sup> October 2020), include giving regard to the size of the existing housing stock of each local authority and introducing a “change over time” factor into the affordability adjustment). Early indications<sup>1</sup> are that the standard method would produce a lower housing requirement for Leeds than the current Core Strategy requirement of 3,247 dwellings per annum. However, until formal proposals emerge, such indications should be treated with caution.
- 3.3.12 *Matters to consider in consultation response.* Setting housing requirement targets through the Local Plan has previously shown to be costly and time consuming (with regard to examination and evidence base costs). However, it may be considered that a nationally set target has the potential to not take full account of local factors. At present the proposals do not clarify whether the housing requirement figure generated by the standard method is subject to

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<sup>1</sup> Litchfield Planning Consultancy has produced standard method figures for all local authorities which includes a figure of 2,387 dwellings per annum for Leeds.

consultation with the Local Authority or whether the nationally generated figures is the final step.

- 3.3.13 ***Proposal 5: Automatic granting of outline planning permission for the principle of development.*** This proposal ties in with Proposal 1 concerning designation of Growth or Renewal Areas. For development in growth areas, the White Paper considers whether the more detailed approval should be via a reformed reserved matters process or a Local Development Order linked to a master plan or design code. For development in renewal areas automatic approvals will also be available for pre-established development types. LDOs can also be used or otherwise proposals will be considered against policies as is the case now.
- 3.3.14 *Matters to consider in consultation response:* Issues of timing should be considered; particularly whether detailed design guidance or codes are expected to be in place before development commences.
- 3.3.15 ***Proposal 6: Decision making should be faster and more certain, with firm deadlines, and make greater use of digital technology.*** Increased national standardisation and modernisation of planning processes is proposed with new digital software to improve efficiency of use and monitoring of outcomes. Documentation to accompany planning applications is to be streamlined and incentives will be investigated for determining applications with statutory time limits. The appeals process should be made more efficient and if appeals are successful, the appellant should be entitled to a rebate of their planning application fee.
- 3.3.16 *Matters to consider in consultation response:* It may be important to consider the implications and requirements for upskilling planning staff to enable the use of new systems and processes as well as the cost of investment of such systems, in addition to the financial impact the proposal to rebate fees might have.
- 3.3.17 ***Proposal 7: Local Plans should be visual and map-based, standardised, based on the latest digital technology, and supported by a new template.*** Plans should be more visual and less reliant on text, and capable of being read on different digital platforms including smartphones. The new plans and digital consultation tools should make it easier for people to understand what is being proposed where and how it will affect them, transforming engagement with the public. Pilot studies will be set up between tech companies and local authorities to support more effective plan making and community involvement.
- 3.3.18 *Matters to consider in consultation response:* The Council already makes good use of digital technology, with the interactive maps for SAP being a significant step forward in embedding digital solutions. As such, it is anticipated that all future Plans in Leeds would make use of such digital technology (where appropriate). However, consideration should be given to how written policies would be expressed under the new system.
- 3.3.19 ***Proposal 8: Plan Making will be speeded up with a statutory timetable.*** Plan making should be shortened to 30 months with the following :
- 6 months: call for sites and suggestions

- 12 months: the LA draws up its plan with evidence to justify its proposals
- 3 months: submission of Plan for examination & public consultation
- 9 months: examination, subject to the new sustainable development test

3.3.20 Some transition arrangements are proposed for local authorities who have recently finished plans under the current system, suggesting that they would have 42 months to adopt a new local plan. If LAs fail to meet the timescales, sanctions are proposed including issuing of directions.

3.3.21 Matters to consider in consultation response: After the initial 6 months period of seeking sites and suggestions there will be one round of formal public consultation as part of the Plan submission. Consideration should be given to the potential difficulties in producing more detailed plans over a shorter timescale.

3.3.22 In terms of the Local Plan Update, the Council will need to carefully consider any requirements to have a new style plan in place by a particular time and any transition arrangements. Until the requirements and timings of the new system become clear, the Council will need to consider what plan making preparations should be made in the interim.

3.3.23 ***Proposal 9: Neighbourhood Plans should be retained as an important means of community input, and we will support communities to make better use of digital tools.***

3.3.24 Matters to consider in consultation response: Further clarity may be beneficial on how Neighbourhood Plans will be expected to be updated in accordance with the new system. In terms of the making of new Neighbourhood Plans there may be a need to upskill and resource neighbourhood plan makers, particularly in terms of digital tools.

3.3.25 In drafting a plan under the new system, there will be an opportunity for it to be prepared in a collaborative way with neighbourhood planning groups from the outset with roles for Neighbourhood Plans to provide spatially specific policy for their areas, particularly in terms of local design codes.

3.3.26 ***Proposal 10: To help speed up the delivery of development the NPPF will make clear that for areas of substantial development there should be different housebuilders providing a variety of house types so more phases can come forward together.***

3.3.27 Matters to consider in consultation response: This is reflective of previous provisions contained within the Housing White Paper. At present, Leeds already presses for multiple developers to work on major sites. It is considered that without further details of powers given to local authorities, there is the potential for this proposal to not meet its objective. However, if such proposals can be effectively implemented there are positive implications for the delivery of housing in Leeds.

3.4 Pillar 2: Beautiful and Sustainable Places

- 3.4.1 In summary, this pillar provides more detail on how design codes can be used to set out the parameters for development and makes proposals that each local authority should appoint a chief officer to promote good design and for the establishment of a national expert body on good design. There is also discussion about protecting natural and historic environments and promoting the energy efficiency of buildings,
- 3.4.2 ***Proposal 11: Local Design Guidance and Codes.*** The Government sees local design guidance and codes as a way of providing early clarity to prospective developers on the nature of acceptable development. Local design codes can be produced either by the local authority (preferably in parallel with the Local Plan), by groups preparing Neighbourhood Plans or by developers of major sites. They will be subject to local consultation.
- 3.4.3 The Government published the National Design Guide in 2019 and is proposing to refresh the Manual for Streets from 2007 and along with the National Model Design Code that it is promising to consult on this autumn, these three national documents will provide a default position for deciding on the acceptability of development in the absence of local codes.
- 3.4.4 *Matters to consider in consultation response:* This represents a significant shift in planning approach, from giving advice to developers on their planning applications to setting out guidance and codes in advance, potentially through adopted Local Plans. Consideration may be given to how this system will ensure codes will be sufficiently responsive to site circumstances and content, particularly in a city as complex and varied as Leeds.
- 3.4.5 ***Proposal 12: A new expert advisory body will be set up to help local authorities with design guidance and codes, and local authorities will be expected to appoint a chief officer for design and place making.***
- 3.4.6 *Matters to consider in consultation response:* There is the potential for this measure to raise the profile of design and place-making, which may be considered a positive step. However, implications for the Council's budget may also be a further consideration, of the measures.
- 3.4.7 ***Proposal 13: Imbed design for beautiful places into the objectives of Homes England.***
- 3.4.8 *Matters to consider in consultation response:* There is the potential for this measure to raise the importance of design in developments that are funded by Homes England, which may be considered a positive step.
- 3.4.9 ***Proposal 14: Fast Track for Beauty.*** This has three main strands:
- NPPF update to give positive advantage to schemes that comply with local design codes
  - For designated *Growth Areas* there will be legislation to require as a condition of a "permissions in principle" the agreement of a masterplan and site specific code prior to detailed proposals coming forward. These can be prepared by LA or developer
  - Legislate on Permitted Development (PD) to make PD responsive to local codes / policy.

- 3.4.10 Matters to consider in consultation response: Proposal to make PD responsive to local codes may have positive impacts on the quality of development. For example, Leeds may be able to implement local internal space standards for dwellings converted from offices. However, details remain outstanding on how this would be implemented.
- 3.4.11 The White Paper has a section entitled “Natural Environment” with intentions to promote environmental recovery and long term sustainability, mitigate/adapt to climate change, reduce pollution, and make places more liveable with green spaces & trees. It refers to the Environment Bill concerning net gains for biodiversity and anticipates consultation in the autumn on making all new streets tree-lined and a replacement environmental procedure to replace sustainability appraisal, strategic environmental assessment and environmental impact assessment. However, there are only two numbered proposals:
- 3.4.12 **Proposal 15: NPPF to expect new Local Plans to identify growth, renewal & protection areas, and sub-areas in ways that can support climate change adaption & mitigation** (e.g. density to promote active travel).
- 3.4.13 Matters to consider in consultation response: Consideration may want to be given to how climate change adaption and mitigation can be applied to sub-areas, and how this would be captured in local policy.
- 3.4.14 **Proposal 16: The NPPF to make clear the role that local spatially specific policies can play in promoting the natural environment**. Examples are given of protecting views, securing public access, and identifying places for renewable energy / forestry creation.
- 3.4.15 Matters to consider in consultation response: The general thrust of the Government’s proposal is to centralise authority for determining policies on the environment in a set of national generic policies. Proposal 15 offers to clarify in the NPPF what degree of local policy distinctiveness may be allowable. This detail will be important in understanding the role Local Plans (including the Local Plan Update) can have in setting locally responsive policies on natural environment issues.
- 3.4.16 **Proposal 17: Conserving and enhancing our historic buildings and areas in the 21st century**. Proposals include:
- Local plans to identify buildings and areas for protection
  - Recognise the role for historic buildings in settlement renewal, including adaptability to climate change through energy efficiency
  - NPPF update to conserve historic environment but allowing sympathetic changes
  - Give architectural specialists autonomy from routine Listed Building consents
- 3.4.17 Matters to consider in consultation response: Consideration may be given to whether this proposal results in new formal powers for Local Authorities.
- 3.4.18 **Proposal 18: Facilitate ambitious improvements in the energy efficiency standards for buildings to help deliver our world-leading commitment to**

**net-zero by 2050.** There is a commitment to follow up on the Future Homes Standard consultation 2019. From 2025 new homes should have 75-80% lower CO2 emissions than current and called “Zero Carbon Ready” homes. There is also a commitment to clarify in the autumn what role LAs can play in setting energy efficiency standards for new build developments.

3.4.19 *Matters to consider in consultation response:* As Leeds is committed to net zero carbon by 2030 it may be considered a missed opportunity that the Government is continuing to set 2050 as its target. Consideration may be given to whether standardised national policies for this 2050 aspiration will go far enough to meet Leeds’ climate emergency ambitions. This may have implications for the scope of the Local Plan Update, should national policy prevent Local Authorities from being more ambitious.

### 3.5 Pillar 3: Planning for Infrastructure and Connected Places

3.5.1 In summary, this pillar views the current system of s106 as uncertain and opaque with reliance on negotiation causing delay. The Community Infrastructure Levy (CIL) is seen as inflexible as it is paid on commencement of development creating cash-flow challenges especially for smaller developers. Instead it proposes a reformed infrastructure levy set nationally based on development value.

3.5.2 ***Proposal 19: CIL reformed and charges as a fixed proportion of the development value above a threshold, with a mandatory nationally-set rate(s) and s106 abolished.*** This would have the following features:

- Flat-rate, value-based charge, set nationally at either a single rate or area-specific rates.
- Applies across all use classes
- Charged on the final value of development
- Levied at the point of occupation
- Kicks in at a value-based minimum threshold to prevent low viability development becoming unviable – reflecting average build costs per sqm, with a small fixed allowance for land costs.
- Local authorities can borrow against CIL revenues to forward fund infrastructure.

3.5.3 *Matters to consider in consultation response:* It is considered that this proposal may benefit from being set as area specific rates; otherwise there is a potential danger that northern authorities will lose out due to lower values.

3.5.4 It is also considered that there may be potential for the levy to be a disincentive to redevelopment of marginal sites, without the scope for flexibility or negotiation.

3.5.5 Finally, additional detail would be beneficial on how local authorities can bridge the gap between need for infrastructure spend at the beginning and levy payments being made at the end. However, it may be the case that a single system would have benefits over the current system, and an effective means of reducing delays associated with long negotiations via s.106 would have positive implications for development, if such a system could be successfully implemented.

- 3.5.6 **Proposal 20: The scope of the levy could be extended to capture changes of use through PD rights, even if there is no additional floorspace.**
- 3.5.7 Matters to consider in consultation response: This may have the potential to level the playing field for PD residential development to make the same contribution as development that is granted by local authorities as at present development through PD does not attract CIL liability.
- 3.5.8 **Proposal 21: The reformed levy should deliver affordable housing provision.** The following details are set out:
- Aim to continue to deliver on-site affordable housing at least at present levels.
  - Affordable housing can be secured through in-kind delivery on-site (could be made mandatory by the local authority)
  - S106 could still secure the delivery, but with the value captured through the levy.
  - LAs can specify forms and tenures of affordable housing
  - Some risk transferred to LPA – in event of market uplift, could allow LPAs to ‘flip’ units back to market units if levy is of lower value than secured through in-kind units, or could give developer no right to claim overpayments
  - LPAs could have options to revert back to cash contributions if no Registered Provider is willing to buy the homes due to their poor quality.
  - LPAs could also accept levy payments in the form of land within or adjacent to a site for them to directly build affordable housing on.
  - Alternatively could introduced a ‘first refusal’ right for local authorities or registered providers to buy up a (nationally set) proportion of on-site units at a discounted price.
- 3.5.9 Matters to consider in consultation response: The proposed arrangements appear to make provision for on-site delivery of affordable housing, but further clarity is needed to understand the full implications. Also, it is currently unknown whether other sorts of in-kind payments will be supported e.g. schools, health centres and green space.
- 3.5.10 **Proposal 22: More freedom could be given to local authorities over how they spend the levy.** The neighbourhood share is to be retained but the White Paper asks how community engagement about spending choices could be improved.
- 3.5.11 The White Paper examines the scope for more flexibility around spending. One option would be for LAs to spend receipts on policy priorities once core infrastructure obligations have been met. This could even include improving services or reducing council tax. It is however recognised that ring fencing may be necessary to ensure that affordable housing continues to be delivered on-site at current levels (or higher).
- 3.5.12 Matters to consider in consultation response: Experience of the CIL in Leeds suggests that there may be concerns that this new levy may not raise enough money to cover all infrastructure requirements. Further details would be beneficial on the role of s.106 in securing delivery of on-site requirements that

are non-financial, for example affordable housing arrangements, travel plans and local employment agreements.

### 3.6 Delivering Change

#### 3.6.1 ***Proposal 23: As we develop our final proposals for this new planning system, we will develop a comprehensive resources and skills strategy for the planning sector to support the implementation of our reforms.***

Most funding of the planning system should come from the beneficiaries of development rather than the taxpayer, but some local planning activities should be funded through general taxation given the public benefits of good planning. Funding for transition to the new planning system will be made available. But local authorities will be subject to a performance framework to ensure continuous improvement.

#### 3.6.2 Matters to consider in consultation response: At the time of writing the implications of this proposal are not fully understood, however, it is hoped that more information can be provided to Members at the meeting of Development Plan Panel.

#### 3.6.3 ***Proposal 24: We will seek to strengthen enforcement powers and sanctions. More powers and higher fines will be considered, including for unauthorised development and encampments.***

#### 3.6.4 Matters to consider in consultation response: At the time of writing the implications of this proposal are not fully understood, however, it is hoped that more information can be provided to Members at the meeting of Development Plan Panel.

### 3.7 Matters not covered by the White Paper

#### 3.7.1 There are a number of themes and issues that are not captured within the White Paper, such as planning for other key issues such as employment land, town centres, minerals and waste. Whilst the consultation questions do not give an opportunity to respond on these matters, it may be considered appropriate to include comments on these issues via a covering note.

### 3.8 **Consultation and engagement**

#### 3.8.1 The consultation on the White Paper runs until 29<sup>th</sup> October. The consultation is structured around 26 consultation questions (as set out in Appendix 1). If an on-line response is made, it is only possible to respond to the questions which are mainly “do you agree with our proposal for .... Yes, No, Not Sure” and a space is normally provided for a supporting statement. There is an email address for other comments to be sent.

#### 3.8.2 So far, officers have sought to canvass views from the different planning teams and from related services by holding a number of discussion meetings.

### 3.9 **Equality and diversity / cohesion and integration**

#### 3.9.1 An EDCl is not required for this report as no policy change is proposed.

### **3.10 Council policies and the Best Council Plan**

3.10.1 There is a clear role for planning in delivering against all of the Council's priorities as established through the Best Council Plan, particularly 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

3.10.2 Initial impressions suggest that the White Paper may have a fundamental impact on the Council's ability to set policies for the above priorities. As such, the Council will consider carefully how proposals in the White Paper will impact on ability to plan Leeds to meet Best Council priorities, as part of its formal response to the consultation.

### **3.11 Resources, procurement and value for money**

3.11.1 There are no specific implications arising from the recommendations in this report.

### **3.12 Legal implications, access to information, and call-in**

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

### **3.13 Risk management**

3.13.1 The White Paper proposals pose a number of questions for how the Council deals with a range of planning matters, including the Local Plan Update. If the Council commences work before further details of the White Paper proposals become clear, there is a potential risk that work could be negatively affected by subsequent national policy and law. A key unknown is how long it will take for the new planning system to be enacted and what transitional arrangements will be in place. However, there is also no guarantee that the final version of the planning system will fully reflect the current provisions of the White Paper. As such to change the Council's stated approach to meeting the climate emergency through the Local Plan Update on the basis of draft national policy may limit the Council's ability to meet its aspirations for net zero carbon by 2030.

## **4. Conclusions**

4.1.1 This report sets out the headline changes contained within the Planning White Paper, 'Planning for the Future' which was published on the 6<sup>th</sup> August 2020. If fully enacted, the proposals within the White Paper may result in a significant

shift in how planning matters are dealt with in Leeds. In order to aid Members' discussions potential implications of the proposals are set out. It is anticipated that a further report with a draft detailed response will be brought to DPP for consideration and endorsement in October in advance of the 29<sup>th</sup> October deadline for consultation comments.

## **5. Recommendations**

- 5.1 Panel Members are asked to note and comment on the contents of the report.