

## Local Plan Update: Towards a Publication Draft

Date: 18<sup>th</sup> January 2022

Report of: Chief Planning Officer

Report to: Consultative Meeting of Members of the Development Plan Panel

Will the decision be open for call in?  Yes  No

Does the report contain confidential or exempt information?  Yes  No

**Wards affected: ALL**

Have ward members been consulted?  Yes  No

### What is this report about?

#### Including how it contributes to the city's and council's ambitions

- This report provides an update on the Local Plan Update (LPU) and sets out the next steps as the plan moves towards a Publication draft. The report therefore includes four elements: 1) Appendix 1 is a Report of Consultation providing a final analysis of the statutory (Regulation 18) consultation which took place over the summer of 2021. 2) A discussion within the report on agreeing the final scope for the Local Plan Update. 3) An introduction to the rationale for assessing policy options and reasonable alternatives for their sustainability, 4) A headline review of the Government's 'Net Zero Strategy: Build Back Greener' and its implications for the Local Plan Update.

### Recommendations

- a) Members are requested to note the contents of the report and provide comments.

### Why is the proposal being put forward?

1. This report is being put forward to Members as part of the ongoing work to progress the Local Plan Update towards a Publication Draft. As part of this process Members are requested to provide comments on the four key elements of this report, as set out above and detailed below.

*The Report of Consultation*

2. The Report of Consultation (Appendix 1) details the consultation activities undertaken as part of the Regulation 18 consultation which took place for 8 weeks from the 19th July – 13th September 2021. Synthesising and expanding on the information that was presented to Development Plan Panel (DPP) in September and November 2021, it provides a summary of the headline issues raised and received as part of the consultation. Whilst this document seeks to conclude the Regulation 18 stage of the Local Plan Update, the report of consultation is an iterative document that will be updated and expanded upon following each future stage of engagement before ultimately being submitted to the Secretary of State as part of the submission documents to support the Local Plan Update's Examination in Public. In addition, the Report of Consultation will also be a key document in the next statutory consultation (known as Regulation 19 Publication Draft consultation), enabling consultees to understand the breadth of comments made at the Regulation 18 stage.
3. Overall, there was very strong support for the proposed scope of the plan. The vast majority (circa 87%) of consultee representations have made it clear that they support the Plan focussing on the climate emergency, with respondents being encouraged by the proposed direction the Plan will take. Respondents have also clearly stated their feelings, that addressing the climate emergency is the most pressing issue faced by the Council and society at large.
4. However, a minority of responses did suggest that the scope of the proposed Plan should be altered. The following section will go into more detail on the nature of the scope of the Plan and assesses the alternatives proposed. For clarity, it should be noted that this section relates only to the overall scope of the Plan (e.g. what topics it should contain) and does not include the large number of detailed comments related to the contents of policies.

#### *The Scope of the Plan*

5. As Members will recall, Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012) requires Local Planning Authorities to consult on the "*subject of the local plan which the local planning authority propose to prepare and invite each of them [consultees] to make representations to the local planning authority about what a local plan with that subject ought to contain*". What a plan contains is referred to in this report as the scope of the plan.
6. At Executive Board on the 23<sup>rd</sup> June 2021 the initial scope of the LPU was agreed: "*Update and create new policies; make consequential changes, within the Adopted Leeds Core Strategy (amended 2019), the Natural Resources and Waste Local Plan (2013) and Unitary Development Plan (2006) which focus on: carbon reduction, flood risk, green infrastructure, place-making and sustainable infrastructure in order to adapt to and mitigate the impacts of climate change and ensure the delivery of sustainable development within the Leeds Metropolitan District for a period of at least 16 years from Adoption*". This was subsequently reflected in the consultation material (also approved by Executive Board), which sought consultees' views on a scope that focussed on the need to update and improve existing policies and make new ones to help address climate change and the climate emergency declaration, through the 5 topic areas. As shown within Appendix 1, and as reported in November 2021, a number of consultees have raised alternative topics to the 5 suggested to be included within the scope of the Plan. These include: overall housing delivery, affordable housing delivery, employment land delivery and the inclusion of 'Blue Infrastructure' to be more explicitly recognised within the scope.
7. Before significant progress can be made on drafting policies of the Plan, it is necessary to agree the final scope of the Plan. Consideration must be given to comments received as part of the Regulation 18 consultation and whether these comments require that the initial scope is altered.

In order to arrive at a view as to which proposed alterations to the scope should be agreed it is important to consider them against the stated objectives of the Plan. As stated in the consultation material *“The priority for the Local Plan Update is to update and improve existing policies and make new ones to address climate change, and the climate emergency declaration to achieve net zero emissions by 2030”*. Below, an analysis is provided against the alternative options proposed against this stated objective. It should be noted that all Local Plan policies were reviewed in July 2020 to see if they needed to be updated and the decision arising from this exercise published on the City Council’s website. For many policy areas it was concluded that whilst there may be a need to consider updating policy against a revised evidence base and conformity with national policy, before the end of the current plan-period of 2028, policies responding to climate emergency were of such significance that they should be prioritised. This was especially the case, given the City Council’s declaration of a “Climate Emergency” in March 2019. The review of policies only relates to those that are 5 years or older and therefore those policies updated as part of the Core Strategy Selective Review (CSSR) 2019 were not reviewed. In line with the Council’s published Local Development Scheme (2021) a further Local Plan Update ( LPU2) and its objective and scope is due to be considered by Members in Summer 2022 and many of the matters considered below can be considered as part of that exercise.

### *Alternative Scopes Proposed*

Below provides a headline summary of the alternative scopes suggested and an officer response to those proposals. (The issues raised below relate only to comments received on alterations to the overall *scope* of the Plan and do not reflect the detailed comments on policies and their contents.)

- **The Plan should Re-assess the housing requirement and its spatial distribution** – it is not considered that this topic directly relates to the overall objective of the LPU in helping to address climate change and reducing emissions by 2030, nor any of the related subject areas. Moreover, the housing requirement has recently been updated in the CSSR (2019) and the Council’s evidence base on housing is for a healthy supply up to the end of the plan period and beyond.

Whilst it is hypothetically possible that the construction of fewer houses overall could reduce emissions, there is no guarantee, when taking the NPPF (specifically the Standard method and 35% urban uplift) into account, that this would be the case. The matter of housing requirement and distribution is a matter that can be better addressed through Local Plan Update 2. However, some of the topics in LPU such as place-making and 20-minute neighbourhoods will in any event set a strategic context within which to sustainably consider distribution in due course.

As such, and within the context of available resources and the priority need to adopt policies for climate change as quickly as practicable, it is not considered that this substantial topic area is one which is reasonable to include within the scope of the Local Plan Update , but it is fully acknowledged that there is an opportunity to address it through LPU2.

- **The plan should include new Affordable housing policy** - whilst it is recognised that the need and delivery of affordable housing is of key importance, it is not considered that this topic relates to the overall objective of the plan of helping to address climate change and reducing emissions by 2030, nor any of the related topic areas. The matter of affordable housing policy has recently been updated through the CSSR (2019) and can be better addressed through a future review of the Plan (LPU2) where it can be considered alongside evidence on a revised future housing requirement. As such, and also within the context of available resources and the priority to adopt policies for climate change, it is not considered that this topic area is one which is reasonable to include within the scope of the Local Plan Update. In reflecting the Council's immediate priorities to increase affordable housing delivery, an affordable housing delivery plan is being prepared which will help facilitate and expedite the delivery of policies and programmes to which the City Council is already committed.
- **The plan should review Employment land requirements and allocations** - it is not considered that this topic relates to the overall objective of the plan of helping to address climate emergency and reducing emissions by 2030, nor any of the related topic areas. The matter of employment land requirements and allocations can be better addressed through Local Plan Update 2 where in-depth evidence can be considered. It is accepted that the Council currently has a shortfall of general employment land. This is due to safeguarding directives from Government. However, subject to a final round of consultation and receipt of Inspector's Report, the SAP Remittal will result in the allocation of additional employment land to help remedy this gap. As such, and also within the context of available resources and the priority to adopt policies for climate change, it is not considered that this topic area is one which is reasonable to include within the scope of the Local Plan Update 1.
- **The plan should include 'Blue Infrastructure' as a specific topic** – whilst consideration of blue infrastructure policies formed part of the green infrastructure, place-making and flood risk topic areas of the LPU, it is considered that it is a reasonable, given the objectives of the Plan to be clearer about blue infrastructure, particularly given the role that blue infrastructure can have in reducing emissions from the transportation of freight, as well as the generation of energy through water source heat pumps. It is therefore proposed that Blue Infrastructure being incorporated into the Local Plan Update is a reasonable alternative to that proposed which will be subject to a Sustainability Appraisal.

- **The “Ecological Emergency” should be added to the scope** – The ecological emergency relates to the loss of habitats and overall biodiversity, as well as the impacts of a warming planet upon ecological resources and their resilience. At a national level, interventions such as the 2021 Environment Act will make provisions for increased provision of biodiversity through the planning system. It is considered that the Local Plan Update will already give prominence to ecological matters through the proposed biodiversity and nature conservation sections of the Green Infrastructure topic, and it is therefore not considered reasonable or necessary to add the term ‘ecological emergency’ to the scope. However, consideration will be given to whether more explicit references to the ‘ecological emergency’ can be made within the Green Infrastructure topic and reflected within the plans headline objectives, and whether, through the protection and enhancement of Green Infrastructure, planning policies will seek to complement wider Policies and interventions to tackle a recognised ‘Ecological Emergency’.
- **Consideration of the important contribution Leeds’ mill buildings make to the its urban and historic environment** – Following a submission from Historic England. It is not considered that this specific issue relates to the overall objective of the plan of helping to address climate change and reducing emissions by 2030, nor any of the related subject areas. The Local Plan already has a number of policies which offer protection to heritage assets. However, it is recognised that policies for carbon reduction may need to be applied differently to designated heritage assets and recognise their important cultural and civic role. This was recognised by the Grosvenor Report<sup>1</sup> and the development of policies for LPU will consider how they apply to the large numbers of all heritage assets in Leeds so that these are not lost on the basis of sustainability where viable and feasible options are available to retrofit them. As such it is considered that incorporating this topic area into the LPU is a reasonable alternative which will be subject to a Sustainability Appraisal.
- **Review and update policy on specialist housing for older people** - it is not considered that this topic (as a whole) relates to the overall objective of the plan of helping to address climate change and reducing emissions by 2030, nor any of the related topic priorities. However, it should be noted that the Flood Risk topic includes policy areas such as ‘resilience’, which directly relate to the design and location of elderly accommodation within flood risk areas. Overall, however, the matter of specialist housing for older people for the can be better considered through Local Plan Update 2. It should be emphasised also that the adopted Site Allocations Plan, identified particular housing allocations as being suitable to help meeting the needs of older people, given the location and proximity to local services and infrastructure. As such and within the context of available resources and the priority to adopt policies for climate change it is not considered that this topic area is one which is reasonable to include within the scope of the Local Plan Update.
- **The Plan should have a clear 15-year Plan Period lasting until 2038 / The Plan Period should be extended to 30 years** – Within the context of current national planning legislation, it is the intention of the Local Planning Authority for the Plan to have a 15-year Plan period from adoption, in accordance with the National Planning Policy Framework (NPPF). Whilst the NPPF does allow, in some limited instances, authorities to establish 30-year plan periods, this is explicitly in relation to new large-scale developments, such as new settlements. Such proposals are not considered to relate to the overall objective of the Plan and as such it is not considered this topic to be one which is reasonable to include within the scope of the Plan.

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<sup>1</sup> [Grosvenor - Heritage and carbon](#)

- **Health equity and addressing other inequalities should be an explicit goal of the Plan** – The existing Core Strategy already contains objectives relating to public health and wellbeing, as well as a number of objectives directly relevant to reducing inequalities across communities. With regard to health equity, ‘health and wellbeing’ is one of the Best Council Priorities of Leeds City Council. The Local Plan includes a range of policy areas that have the potential to help improve health, such as place-making and green infrastructure. However, health equity is not an ambition that the planning system can deliver by itself, and the role of planning is just one of many key services that help contribute to such ambitions. As such and within the context of available resources and the priority to adopt policies for climate change it is not considered that this topic area is one which is reasonable to include within the scope of the Local Plan Update. Instead, current wording could be adapted to make clear the commitment to contribute to health equity. With regards to reducing other inequalities, it is hoped that the policy areas contained within the LPU will help to reducing inequalities. The sustainability appraisal process also measures the suitability of new policy proposals against indicators directly related to reducing inequality, so whilst not included as an explicit goal through this Local Plan Update, its inclusion within the existing Core Strategy and the way it is embedded within the process of plan-making ensures that it is given due regard.
- **A strategic plan for how funding from developments is used** – Leeds already has a strategic plan for how funding from developments is used, known as the Community Infrastructure Levy (CIL). For funding that lies outside of the CIL remit, such as S106 monies, it is understood that the Government is reviewing how funding from developments is spent on infrastructure through its review of the planning system. It is considered appropriate to wait until the results of this review are known before embarking on any further strategic work on developer contributions. As such and within the context of available resources and the priority to adopt policies for climate change it is not considered that this topic area is one which is reasonable to include within the scope of the Local Plan Update.
- **The Plan should consider the role of communities within the process** – The preparation of the Plan will consider the role of communities in the process. The mechanism for this is set out in the Council’s Statement of Community Involvement. Moreover, the Council will work closely with its many neighbourhood forums to explore ways in which they wish to promote climate change. As such it is not considered that this topic area is one which is reasonable to include within the scope of the Local Plan Update.
- **New policy to increase provision of Electric Vehicle charging points in areas without off-street parking** – whilst directly relevant to the objectives and proposed scope of the Plan, the policy area of electric vehicle charging was recently updated by the Core Strategy Selective Review (policy EN8). The 2020 Local Plan Review identified that such policies were not in need of review. However, whether further strengthening of existing policy could be achieved through the LPU1 will be considered, following a Sustainability Appraisal process.

- **The Plan should include a clearer commitment to the ‘Circular Economy’, by decoupling economic activity from the consumption of finite resources by keeping materials in use for longer, e.g. more use of recycled and recyclable materials** – This is considered to be directly relevant to the objectives and proposed scope of the Plan. However, it is not necessarily considered that including a commitment to a circular economy would constitute an alteration to the scope of the Plan. Indeed, the proposed plan already includes specific policy areas, such as Whole Life Cycle Carbon Emissions, which would help toward achieving the aims of contributing to the Circular Economy. As such, clearer statements regarding the circular economy can be considered for inclusion within the Publication draft Plan but it is not considered that this to represents a reasonable alternative to the scope of the Plan. The Leeds Inclusive Growth Strategy could offer opportunities to set Council wide aspirations and policy on the Circular Economy across all sectors.
- **Inclusion of Public Rights of Way within the Plan** – Within the Green Infrastructure topic it is made clear that policy G1 of the Core Strategy is within scope of the LPU. Policy G1 currently states: *“Development proposals should ensure that opportunities are taken to protect and enhance the Public Rights of Way (PROW) network through avoiding unnecessary diversions and by adding new links”*. As such, it is considered that Public Rights of Way already fall within the proposed scope of the Plan.
- **Inclusion of ‘Protection of soil’ within the plan** – it is considered that this topic is directly relevant to the objectives and proposed scope of the Plan, given the crucial role soil plays in supporting biodiversity but also retaining carbon. It is therefore considered that it is reasonable to include policies for protection of soil within the scope of the Plan and this will be subject to a sustainability appraisal.
- **Inclusion of Air quality and pollution** – it is considered that air quality and pollution are already key elements on the plan, with particular impacts being considered across all topic areas. It is not therefore considered that more explicit references to air quality and pollution would constitute an alteration to the scope of the Plan. However, the option remains for draft policies to explicitly refer to air quality and pollution.
- **Promotion of community projects within the Plan** – it is not considered that this is within the scope of the planning system and is therefore not considered to be a matter which is reasonable to include within the scope of the Plan.
- **The Local Plan Update should be a wholesale review of the entire Local Plan** – such a review would not accord with the objectives of this Plan. In addition, it would delay the creation and implementation of vital climate specific policies, considered to be a priority. As such, and within the context of available resources and the priority to adopt policies for climate change it is not considered reasonable to include this within the scope of the Plan.
- **Inclusion of green jobs, skills and the supply chain in to the Scope of the Plan** – Whilst elements of this suggestion are within the objectives and scope of the Plan, such as the supply chain as part of carbon reduction topics including whole life cycle carbon emissions and sustainable construction, issues such as green jobs and skills are only tangentially relevant. New, ambitious policies for carbon reduction are likely to see an increase in green jobs and skills, as well as support a greener supply chain. However, the planning system alone cannot require the creation of green jobs and skills as the planning system can only influence development which requires planning permission. As such whilst it is considered that these issues could be the subject of new policies, they are not considered as reasonable to be included within the scope of the LPU.

- **Consideration of whether utilities, such as water, should be included within the Sustainable Infrastructure topic** – It is considered that utilities providers, as result of separate legislation, have the ability to undertake development without the need for planning permission. Whilst it has separately been considered that blue infrastructure could be included within the scope it is unclear what benefits including utilities such as electricity, gas and water, would provide. Once adopted, however, LPU1 has the potential to influence utility providers through their own Plans, Programmes and related legislation (such as the Water Framework Directive), to deliver utilities within environmental limits and resources more sustainably. As such, it is not considered that this topic area is one which is reasonable to include within the scope of the Local Plan Update.
  - **More consideration of how Covid-19 will impact society and managing the future risks of pandemics should be an objective of the Plan** – whilst being a crucial issue in current times it is not considered that including such a topic is reasonable given it does not accord with the objectives of Plan, as it has no relationship with the climate emergency. However, as more information emerges on the pandemic and its effects, consideration will be given to its potential inclusion within the scope of Local Plan Update 2, particularly with regard to the health of High Streets and Town Centres.
8. It is therefore considered that having assessed all consultation comments against the focus and objective of the Local Plan Update the scope of the Plan should be:
9. *“Having regard to the objective of the Local Plan Update to update and improve existing policies and make new ones to address climate change, and the climate emergency declaration to achieve net zero emissions by 2030, the scope of the Plan will update and create new policies; making consequential changes, within the Adopted Leeds Core Strategy (amended 2019), the Natural Resources and Waste Local Plan (2013) and Unitary Development Plan (2006) which focus on: carbon reduction, flood risk, green and blue infrastructure (including biodiversity and nature conservation), place-making and sustainable infrastructure in order to adapt to and mitigate the impacts of climate change and ensure the delivery of sustainable development within the Leeds Metropolitan District for a period of at least 15 years from Adoption”.*
10. Comments from DPP are sought on the resultant scope of the Plan having been through Regulation 18 consultation. The revised scope seeks to amplify biodiversity and blue infrastructure and will clarify soil related issues to be included within the Plan, recognising that some of these topics will have an impact on the historic environment. However, the substantive scope has not been reduced or expanded to that proposed by Executive Board.

#### *Alternative Policy Options*

11. Following the analysis of consultation responses, officers are currently developing a catalogue of alternative options for the detailed policy areas. These alternatives are draft policy options that have been generated by officers and by consultees as part of the Regulation 18 consultation. They will enable officers to consider potential policies and other reasonable alternatives to that policy, it will also identify options that are not a reasonable alternative (such as introducing policies that are not within the powers of local planning authorities or the planning system in general). This, in turn, will enable officers to then undertake the Sustainability Appraisal process. The Council is required to undertake a Sustainability Appraisal of a Development Plan Document under section 39 of the Planning and Compulsory Purchase Act 2004, which incorporates the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) (SA Regulations).



12. This work will explore, on a topic by topic basis, the options that exist for each policy area, and the reasonable alternatives (variations) that may exist within them (such as whether the policy should apply to all developments or just major developments, or whether a policy should be implemented immediately on adoption of the Plan or subject to incremental requirements over a transitional period as 2030 approaches). This exercise will then enable officers to narrow down options to enable them to undertake a sustainability appraisal to help determine the most sustainable policy options. It is important to stress that whilst the SA process is a crucial element of the plan-making process it alone is not determinative of which policy options are the most appropriate and must be combined with other evidence, such as viability assessments, before the Local Planning Authority can finalise draft policies.
13. This work is currently in draft and will be explained further through a presentation of key examples at the January meeting of DPP. Following comments received by Members and further refinement, it is anticipated that a draft will be presented on the next meeting of DPP on the 1<sup>st</sup> March 2022.

*'Net Zero Strategy: Build Back Greener'*

14. The Government published its 'Net Zero Strategy: Build Back Greener' in October 2021 after initial consultation on the Local Plan Update closed. The strategy, published by the Department for Business, Energy & Industrial Strategy, sets out the government's overarching approach to meeting its 2050 net zero emissions target. The Strategy acknowledges that whilst greenhouse gas emissions have fallen in the last thirty years there is a need to go further and faster in the next thirty years, right across the economy. It sets out policy proposals to hit the 2050 target across a range of economic areas including power, heat and buildings, and transport. It says that the government recognises, "the importance of the planning system to common challenges like combating climate change and supporting sustainable growth" and that "we will make sure that the reformed planning system supports our efforts to combat climate change and help bring greenhouse gas emissions to net zero by 2050. For example, as part of our programme of planning reform we intend to review the NPPF to make sure it contributes to climate change mitigation and adaptation as fully as possible".
15. One of the tests of soundness of LPU policies will be with government guidance, as set in the NPPF and Planning Practice Guidance, so it is important to understand the direction of travel on future policy setting and to ensure alignment between the Council's proposed approach and that of the Government. The Net Zero Strategy provides broad strategic policy proposals which are considered to align well with the scope of the LPU and the material consulted on in late Summer 2021. The strategy includes the following headlines ambitions that fit directly with the scope of the LPU:

- by 2035 the UK will be powered by clean energy which fits with the Council's ambitions to set policy for low carbon and renewable energy generation and energy storage as an important aspect
- create a high skilled green workforce and businesses that are delivering the latest low carbon technologies, services and innovations. This will help ensure that ambitious policies for decarbonisation across the economy – such as low carbon homes – are effective.
- homes are warm and comfortable, powered and heated by clean, affordable energy – this aligns with the ambitions to build better homes that are heated and powered by renewable and low carbon sources and are well insulated.
- natural environment is protected, enhanced, and more diverse, with healthy ecosystems and increased biodiversity, supporting a sustainable rural economy and providing wider benefits, including improved mental health and protection from risks like flooding and overheating
- towns and cities should have cleaner air for everyone, and support walking and cycling with benefits for health
- journeys to be made in zero emission vehicles, with trains and planes running on new low carbon energy sources

16. The UK Net Zero Strategy also advocates a systems approach which considers the environment, society, and economy as parts of an interconnected system, where changes to one area can directly or indirectly impact others. This is a familiar approach to planners and can be embedded through assessments such as sustainability appraisal.

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

17. The impact of this report is that it provides Members with a further update on the progress of the Local Plan Update, enabling Members to consider the comments raised through the consultation, the impacts they may have on the scope of the Plan, and the consequential impacts upon arriving at reasonable alternatives for all policy areas.

### **What consultation and engagement has taken place?**

18. A full breakdown of consultation and engagement on the Local Plan Update is provided in the Report of Consultation at Appendix 1.

### **What are the resource implications?**

19. The preparation of the LPU 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 provisions. All of the work undertaken has been with collaboration with teams from across the Council.

20. With particular consideration of the resource implications for future rounds of consultations, as we move out of the pandemic we need to consider how a 'digital-first' approach should be supplemented by face-to-face / traditional communications that may be more effective in some communities.

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

21. Plan Making must be in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 which includes the need for statutory consultation and having regard to representations received.

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

22. The plan-making process is a complex one and subject to a number of inherent risks as well as the risk surrounding the overall objective of the LPU to help address the climate emergency. These risks are as follows:

23. Changes to national guidance – this remains a key risk to policy development as it is likely that by the time draft policies are submitted to the Secretary of State for examination by the Planning Inspectorate the Government may have changed the planning and building control systems. The Council will therefore need to set out clear evidential links between proposed policies and achieving its Carbon Budget as required by the Climate Change Act 2008 as well as seeking to pre-empt a national direction of travel. From a technical perspective, changes to the planning system may result in national Development Management policies (as expressed through a revised NPPF) not giving local authorities flexibility to set their own policies on the matters proposed to be in scope for the LPU. In addition, proposed changes to the building regulations may result in local authorities having no scope to prescribe carbon emission rates from new development. At present however, LPAs are being encouraged to continue progressing with their Local Plans.

24. The viability of development – the LPU plays a key role in helping development reduce carbon emissions and help places adapt to climate change. However, there remains a requirement for Leeds to meet its development needs to adequately house its residents and provide necessary jobs. Therefore, the policies need to be effective and viable, both individually and cumulatively. This will be a key issue in plan-making and the Council will seek to work proactively with the development industry to consider the ways in which innovative approaches to development viability can be used to help deliver the objective of the LPU.

25. Resources – the Council's overall financial position is challenging. This may impact on the resources available for progressing the Local Plan Update in a timely manner and, in association with other parts of the Local Plan, may involve sequencing plan-production in accordance with resources available.

### **Does this proposal support the council's three Key Pillars?**

Inclusive Growth

Health and Wellbeing

Climate Emergency

26. There is a clear role for planning in delivering against all of the Council's pillars as established through the Best Council Plan. At this early stage of preparation, the subject of the LPU could contribute positively to the Council's key strategies, as follows:

- Climate Emergency – by managing the transition to zero carbon via policies including: increasing the energy efficiency of buildings, the design of places, the location of development, accessibility to public transport, renewable energy supply and storage;

- Health and Well-being Strategy – through people-centred policies including the design of places, quality of housing and accessibility to green infrastructure and services;
- Inclusive Growth Strategy – through policies including the links between homes and jobs, the location of development, green infrastructure and connectivity.

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

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

27. Not progressing the Local Plan Update in the form proposed could result in key adopted policies relating to the climate emergency being out of date. It would also mean that the Council would not be maximising opportunities to help address the climate emergency and the ambition to be net zero carbon by 2030, through Local Plan policies.
28. This consultation was concerned with notifying people about the subject of the Council's LPU and about what a Plan with that subject ought to contain. The proposed subject was on the introduction of new and enhancement of existing planning policies to help address the climate emergency, including policies on carbon reduction, flood risk, green infrastructure, place-making and sustainable infrastructure. This report and its appendix sets out the headline responses from consultation bodies, residents and those carrying out business in the area, the impact those Responses have on the scope of the Plan and the explains the mechanism for exploring reasonable alternatives that need to be assessed in order to progress an appropriate range of planning policies to address the climate emergency.
29. Other discounted options include widening out the scope of the Plan to include issues not directly relevant to the objective of the Plan and its focus on the climate emergency, including topics such as affordable housing, the overall requirement for housing and employment land. Paragraph 6 sets out the reasons for this.

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

30. Success will be measured by the adoption of a LPU which introduces planning policies that help address the climate emergency.

### **What is the timetable for implementation?**

31. The Local Plan Update has a provisional timetable of Adoption late 2023. The next key milestone will be further public consultation on draft planning policies, with a target to bring these to DPP by June 2022.

### **Appendices**

32. Appendix 1 – Report of Consultation

### **Background papers**

33. None