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Leeds Local Plan Update

Date: 18th March 2025

Report of: Chief Planner

Report to: Development Plan Panel

Will the decision be open for call in?

🗆 Yes 🖾 No

Does the report contain confidential or exempt information? \Box Yes \boxtimes No

Brief summary

The Council is updating its Local Plan, which will set out what new development is forecast to take place, where it will be and how it will look. Previously this was being done in two parts, but for various reasons (including changed national guidance) there is a now need to merge these.

The report sets out the objectives for the plan which concern: setting a revised green belt boundary, revising the settlement network, the scale and location of housing and employment developments, environmental, social and infrastructure considerations.

The report notes the intent to carry out public consultation in Summer 2025 and sets out the approach to that consultation, which aims to ensure hard to reach groups and all demographics and areas have an opportunity to engage with the LLP.

Recommendations

- a) Members to consider and provide comments on:
 - i. the emerging priorities and elements of a vision
 - ii. the proposed draft objectives for the Leeds Local Plan: A Framework for Development in Leeds
 - iii. the approach to public consultation

What is this report about?

1. A Local Plan is a plan for the future development of a local area, drawn up by the local planning authority in consultation with the community, under the Town and Country Planning (Local Planning) (England) Regulations 2012. Local Plans set out what new development is forecast

to take place, where it will be and how it will look. Local Plans signal to investors what the framework for development is in the District for the next 20 years by preparing policies that guide the grant or otherwise of planning permission. Local Plans are the primary means for ensuring communities can engage in shaping new development in their areas, bringing certainty to all users of the planning system.

- 2. This report provides Members with an update on the new *"Leeds Local Plan: A Planning Framework for Development in Leeds"*. The new Leeds Local Plan (LLP) will be a Development Plan Document (DPD), which provides planning policies on a range of matters of relevance to the District; helping to implement the District's Best City Ambition and its plans and strategies e.g. Local Transport Plan, Housing Strategy, Inclusive Growth Strategy and Health and Well-Being Strategy. The LLP is proposed to cover the plan period from 1st April 2022 to 31st March 2042.
- 3. The new LLP was being prepared at the same time as another DPD: the *"Leeds Local Plan Update 1 (Your City, Your Neighbourhood, Your Planet)"*. This report details the changes to the progression of that plan.

What impact will this proposal have?

Leeds Local Plan Update 1 (Your City, Your Neighbourhood, Your Planet)

- 4. The "Leeds Local Plan Update 1 (Your City, Your Neighbourhood, Your Planet)" (LPU1) was a DPD which sought to address objectives about carbon targets, carbon reduction, net zero buildings, green and blue infrastructure, flood risk, place making, and sustainable infrastructure. It had reached an advanced stage of plan-making and carried out its last round of public consultation in October 2023. The intent of the Council had been to submit LPU1 to the Secretary of State for independent examination, however a change to national guidance in November 2023 (the publication of a Written Ministerial Statement (WMS)) dissuaded local planning authorities from preparing policies on net zero buildings that were more ambitious than the Government's own building regulations. These building regulations are also subject to their own changes through the Government's revised Future Homes Standard, towards the end of 2025.
- 5. LPU1 contained policies on operational energy, which would not be compliant with the WMS and would therefore, in the Council's own view, now not be sound because they were no longer in conformity with national guidance. Whilst these were broadly supported by residents and many groups, developers objected to them on the grounds that they were unviable and unfeasible to deliver. Therefore, to avoid the risk of LPU1 being found unsound by an independent inspector, the Council carried out some further work on costs and viability and waited for the outcome of a High Court challenge to the WMS, which was ultimately dismissed and is now being heard in the Court of Appeal.
- 6. Due to the remaining risks to the policy from the extant WMS and the draft Future Homes Standard alongside a worsening of development viability in the interim period the LPU1 policy on operational energy cannot be submitted for examination in its original form. With the passage of time and the advancing progressing of the LLP, it is considered appropriate to consider LPU1 objectives and policies in the round alongside other wider objectives and policies in the LLP, forming one DPD instead of two.
- 7. To that end, a decision to withdraw LPU1 in accordance with Section 22 of the Planning and Compulsory Purchase Act (2004) and incorporate the plan objectives with those of the LLP, was taken by the Chief Officer in consultation with the Executive Member and Development Plans Panel Members in January 2025.
- 8. The Council will retain its intent to progress the objectives of LPU1 to look at how the planning system can help address the Net Zero carbon reduction aspirations of the Council, alongside

flood risk, place making, green and blue infrastructure and sustainable infrastructure objectives. The Council will also not start the consideration of these objectives from scratch and will make use of all the comments that residents and developers have provided through the previous rounds of public consultation.

Local Development Scheme

- 9. The Local Development Scheme is the work programme of the planning documents for Leeds. It has been updated with the following changes:
 - a) withdrawal of Local Plan Update 1
 - b) amendment to the timetable of the new Leeds Local Plan
 - c) amendment to the proposed objectives of Leeds Local Plan to now include carbon reduction, green and blue infrastructure, flood risk, place making and sustainable infrastructure
 - d) note that Policy HGR11 of the Site Allocations Plan has been reviewed and the Council has concluded that on the strength of housing land evidence sufficient land is allocated in the District up to 2028 and it does not need to be updated
 - e) note that Policy HGR22 of the Site Allocations Plan has been reviewed and the Council has concluded that on the strength of housing land evidence it needs to be updated. The appropriate DPD for this update will be the Leeds Local Plan.

Leeds Local Plan – Introduction

- 10. The current Leeds Local Plan is a set of five Development Plan Documents (DPDs): namely:
 - a) the Adopted Leeds Core Strategy (amended 2019),
 - b) the Natural Resources and Waste Local Plan (2013),
 - c) Aire Valley Leeds Area Action Plan (2017),
 - d) Site Allocations Plan (2019) (as amended 2024) and
 - e) Unitary Development Plan (2006))
- 11. These DPDs mainly cover the period between 2012 and 2028. Together, the Local Plan and Neighbourhood Plans (currently 22 in number) form the statutory Development Plan, which is used, alongside the National Planning Policy Framework (NPPF), as the starting point to help direct decisions on planning applications in Leeds, subject to other material considerations.
- 12. One intent of the new LLP is to consolidate the five DPDs above into one. This will have the benefit of being clearer, easier to use and help plan users (chiefly residents, investors and developers) understand the quantity, type, design and location of development needed up to 2042.
- 13. The update to the new LLP follows the stages of plan making set out in legislation. There are 5 stages: 1) Scoping, 2) Publication Draft Policies, 3) Submission to the Secretary of State, 4) Examination by an Independent Inspector, 5) Adoption. The scoping stage is the key stage at which people can contribute to the plan and input their ideas on how they would like to see

¹ seeks to ensure that sufficient land is allocated and safeguarded land designated within the SAP (to 2028) to comply with Core Strategy Selective Review housing requirements, which were Adopted after the SAP

² seeks to ensure that sufficient land for Gypsies and Travellers is provided by requiring a review of sites should the quantum of sites provided through planning applications be less than 13 as at 31st March 2023

Leeds develop. To that end, the Council has decided to do this through two public consultations. The first was a high-level consultation in early 2023 on what topics the plan should include considered by DPP in July 2024.

14. The second scoping stage consultation will be held in Summer 2025. The nature of that consultation is set out in the remainder of this report. In the intervening period the Council has developed its evidence base for the Plan, issued a call for sites for landowners to propose sites to the Council for consideration, defined a site assessment methodology and applied this to proposed sites and held plan workshops with Members. Public consultation was originally due to be held in November 2024 but DPP took a decision (September 2024) to delay this due to fundamental changes to the NPPF by Government in December 2024. This consultation takes account of those changes, which were considered by DPP in July 2024 as part of a national consultation and in January 2025 in their final form.

The new Leeds Local Plan (LLP)

- 15. The next sections of this report summarise the main emerging content for the public consultation. This should be read in conjunction with material already considered by Development Plan Panel as follows:
 - taking account of initial public consultation (July 2024)
 - outcomes of DPP workshops (July 2024)
 - taking an area-based approach to planning to meet housing needs across Leeds (July 2024)
 - approach to considering and assessing specific sites (July 2024)
 - the Strategic Housing Market Assessment and student housing market (September 2024)
 - the revised National Planning Policy Framework (January 2025)

LLP - Vision

- 16. The existing vision for the Leeds Core Strategy is comprised of the following ambitions:
 - a) To strengthen Leeds' position at the heart of the City Region
 - b) To grow a diverse economy
 - c) To provide access to jobs for all communities through the growth of local businesses
 - d) For the City Centre to be a successful destination for the people of Leeds
 - e) To establish Trinity and Victoria Gate and deliver a new City Centre park
 - f) To balance brownfield and greenfield land in a sustainable way
 - g) To maintain the settlement pattern of Leeds
 - h) To ensure town and local centres remain at the heart of their communities
 - i) To develop the Aire Valley into a living and working community
 - j) To transform regeneration priority areas into attractive environments and increase connectivity to the City Centre
 - k) To be better connected, by an accessible and integrated transport system

- I) To have a multi-functional network of Green Infrastructure with improved connections
- m) To use innovative techniques and efficient natural resources to be resilient to climate change
- n) To embed place making and benefit public health and well-being
- 17. The delivery of the existing Leeds Local Plan (the 5 DPDs in para 10 above) has been monitored annually and some headline successes since 2012 are as follows:
 - 80% of development has been on previously developed land, including a significant focus on the inner city and specific regeneration programmes
 - Consistently top 3 housebuilder in the country, with over 40,300 new homes delivered across the District
 - Over £50 million of Community Infrastructure Levy, including for the Leeds Flood Alleviation Scheme and schools' budgets
 - Over £120 million in Section 106 planning gains, including for new and improved green spaces, children's play, transport projects and schools
 - 34,000 homes with planning permission, which are yet to complete
 - Delivery of the East Leeds Orbital and start of the East Leeds Extension delivering up to 5,000 new homes
 - Delivery of Trinity and Victoria Gate retail schemes in the City Centre
 - Delivery of City Centre green spaces at Aire Park and Sovereign Square Park and development within South Bank
 - Delivery of major employment hubs with transport infrastructure e.g. Aire Valley, Thorp Park, White Rose Office Park and Kirkstall Forge
 - Delivery of allocated Park and Ride sites across the District which has seen around 10,000 cars taken off District roads³
 - Significantly increased development in the City Centre with over 7,000 homes, a further 4,800 under construction and 15,600 with planning permissions yet to start
 - Delivery of a Leeds Cycle Network and fewer car commuters into the city centre since 2021, reducing congestion and improving local air quality
 - A 4.1% reduction in car mileage across the city since 2019, and a 6% year-on-year increase of electric vehicle charging points
 - Increasing City Centre activity south of the River Aire
 - Waste arisings for the District have reduced and over 60% of waste is incinerated with energy recovery whilst less than 1% is sent to landfill
- 18. The delivery of the Plan has not been without challenge and there remain some key issues for the new LLP to face on to, including:
 - Distribution of housing despite a balanced policy approach, the distribution of housing across the District has not been equal across all communities due to the lack of available sites and this impacts the ability of places to secure new affordable and specialist housing in particular to meet local needs

³ See Connecting Leeds Transport Strategy Annual Update 2024: Action Plan 2 Executive Board Paper, 12th March 2025

- Affordable housing the delivery of affordable housing has not met identified needs and there is a mismatch between where housing delivery is highest (in the City Centre) and the ability to viably deliver large amounts of affordable housing
- Quality of development despite the existing policy framework the overall quality of new development is varied across the District, with some new housing not fulfilling its potential to deliver high quality greenspace or achieve good design; this has not been helped by Government penalties for the absence of a 5 year land supply throughout the last plan period which led to many sites being delivered through planning appeals
- Concerns about lack of local infrastructure one of the most significant barriers facing the implementation of plans is the delivery of the infrastructure needed to support development. The City Council's role in the delivery of infrastructure is generally limited to one of co-ordinator with private firms or other public agencies with an Infrastructure Delivery Plan as a framework to commitments and needs. This is due to the privatisation of energy, telecommunications, gas, water and sewage responsibilities in the hands of private firms, who will tend to deliver minimum contractual or legal levels of provision. Moreover, the delivery of social infrastructure such as health services lies with other public agencies with who the City Council liaise. Where the City Council can take a direct delivery role is on school expansions (but not new schools), greenspace and local transport improvements this relies on securing sufficient funding.
- 19. The Leeds Local Plan Update will consult on a revised set of ambitions/vision, which will take into account the strengths, weaknesses, opportunities and threats of the District. Some proposed issues which can be used to engage with consultees are set out below:

Strengths	Weaknesses	Opportunities	Threats
 access to the countryside diversity of people & place diverse character council house building diverse economy City Centre heritage flood alleviation 	 public transport disparities social deprivation quality of the natural environment cost of housing development quality not equal health and well- being is not equal City Centre social infrastructure 	 innovation City Centre expansion town and local centres collaboration community engagement active travel mass transit City Station play sufficiency 	 pollution flood risk climate change community trust developer viability investment infrastructure capacity national funding

LLP - Draft objectives

20. The consultation on the Leeds Local Plan Update will be focussed on a range of objectives rather than detailed policies at this early stage of plan making. It will be from these objectives that policies will be developed. These objectives are set out below with reference to any options that are to be consulted on alongside relevant evidence base.

Objective 1. Identify land for 82,371 homes to deliver the 74,883 new homes required to meet local housing needs across the district

- 21. The population is projected to grow between now and 2042: people are living longer in existing homes, households continue to be created through divorce and people are remaining as single households for longer. The District also attracts newcomers to work and support the local economy. A lack of appropriate housing options has prevented people from forming their own households, particularly first-time buyers and older people looking for more suitable accommodation. This all results in a need for more housing.
- 22. The Government has determined that, to meet local needs and help address the housing crisis that is being experienced across the country the supply of homes needs to be significantly boosted. It calculates⁴ that for Leeds, at least 3,811 new homes need to be built each year. This figure accords with the local evidence that the Council has gathered through its Strategic Housing Market Assessment, which included a household survey of residents.
- 23. The Government is clear in national planning guidance that local authorities should aim to meet an area's identified Local Housing Need, including with an appropriate mix of housing types for the local community.
- 24. In the past the Council has consulted on a wide range of Local Housing Need (LHN) options and whilst national guidance and the Council's local evidence suggest a clear LHN target of 3,811 homes p.a. (74,883 for the plan period) it is considered appropriate to ask the question of consultees about a higher or a lower LHN target and to explore whether there is evidence to suggest an alternative.
- 25. Meeting a LHN target requires more land to be identified than is sought to meet local needs. The Council knows through monitoring that developers requires a wide range of sites available to it at any given time and more land available than will be ultimately delivered at any one time. Therefore, it is proposed that a 10% buffer is added to the LHN to guide the identification and allocation of sites (i.e. land for 82,371). This approach also helps support the maintenance of a 5-year housing land supply which is a key requirement of the NPPF and significantly reduces the likelihood that speculative development will occur through the plan period.
- 26. Not all the land needed to meet the LHN target will need to be newly allocated as part of the LLP. The Council's land supply evidence base reveals that there are circa. 49,000 homes either on existing allocations, having been completed since 2022, anticipated as windfall through the plan period (i.e. not identified but evidence to suggest will arise) or with planning permission that can contribute. This means that only around 19,000 new allocations need to be made.
- 27. The LLP will need to ensure that the stock of land that it relies on to deliver its LHN is developable, deliverable, available and achievable through the plan period. Part of that will involve considering that long standing site allocations that have not come forward for housing in the past may not meet these characteristics and need to be discounted from the calculations.

Objective 2. Deliver significantly more affordable houses in all communities at a level of affordability that meets local needs

28. Whilst Leeds delivers more affordable homes than many comparable core cities (with record delivery of around 700 homes in 2023/4) the amount of affordable housing delivered over the last 15 years has fallen short of identified needs. The SHMA shows that those affordable

⁴ Through the NPPF, housing need for each Local Planning Authority is calculated using the Standard Method, this incorporates a baseline of local housing stock which is then adjusted upwards to reflect local affordability pressures to identify the minimum number of homes expected to be planned for.

needs have increased by over 70% since 2017, driven by the cost-of-living crisis. The SHMA shows that these needs exist in every settlement and community in the District, and that the availability of truly affordable housing is really important in enabling local people to live in quality housing that meets their needs.

- 29. The SHMA shows that the identified need for affordable housing is 2,200 homes per year to meet a 10-year backlog and newly arising needs. The LLP will not be able to deliver all of this need on its own. To do so would require a fundamental shift in national policy and a significant increase in e.g. Council House building programmes. However, the new LLP can set a policy framework that aims to secure a significant increase in provision through a range of opportunities. These emerging policy options to be consulted on, include whether the Council should:
 - a) revisit the balance of planning gains sought through Section 106 for a variety of objectives including greenspace, education, flood risk and transport improvements to understand the implications of prioritising affordable housing delivery as part of that mix
 - b) assess viability post-permission to ensure that any uplift in viability can be used to clawback lost affordable housing
 - c) amend the benchmark transfer prices of homes to Registered Providers to make their delivery more viable for developers
 - d) allocate a proportion of sites in all sub-areas for 100% affordable housing to ensure that registered providers can engage in the market for land
 - e) maximise land value capture from Green Belt sites where higher levels of affordable housing can be viably delivered in line with the Government's "Golden Rules" e.g. by setting expectations of 50% affordable housing alongside Green Belt land release. In this way the need for affordable housing would influence the location of development across the District. This would align with the SHMA evidence that need exists across the District
 - f) maximise land value capture from non-Green Belt greenfield sites, such as Safeguarded Land e.g. by setting expectations of 50% affordable housing. In this way the need for affordable housing would influence the location of development across the District. This would align with the SHMA evidence that need exists across the District
 - g) seek a prescriptive tenure mix of new affordable homes at 53% social rented homes, 27% affordable rented, 20% affordable home ownership for all development in line with the SHMA. It is noted that achieving social rented housing is more expensive for developers/registered providers than affordable rented, but that in higher value areas affordable rent discounts can often still be out of reach for many prospective residents
 - specify that the mix of affordable housing should meet local needs rather than a prorata mix to match any market homes delivered. The SHMA sets out a different housing mix to that of market housing, including a need for a greater proportion of smaller affordable homes
 - continue the current policy approach to how affordable homes are integrated within wider developments, and whether integrating or 'pepper potting' affordable units across a site is reducing the viability of schemes or the desirability of Registered Providers to manage properties

- j) introduce specific requirements for affordable provision as part of specialist housing schemes (including older persons housing and purpose built student accommodation) in line with the SHMA evidence base
- k) provide a different approach to particular models of market development, such as Build to Rent and Co-Living schemes, where significant on-site facilities are a factor in the overall housing offer.

Objective 3. Deliver the right mix of housing in the District, including significantly more homes for specialist needs

- 30. The LLP is committed to ensuring that sufficient housing to meet all different needs is available in the district and will set out policies to ensure that a sufficient number and range of homes can be provided to meet the needs of present and future generations and this will include policies around housing mix, type and tenure, looking at the specialist needs of housing (older people, accessible homes, self and custom build, student accommodation and looking also at Houses in Multiple Occupation and large scale purpose built co-living.)
- 31. Housing Mix:
 - a) The LLP is committed to addresses the challenges of meeting the needs for new homes across the city. The LLP requires a strategy-led distribution of the housing needs set out in the SHMA by sub-area and settlement geographies in order to deliver more family housing; sufficient affordable housing; increasing the supply of larger homes across the District, particularly in areas suffering from high levels of overcrowding and respond to the needs of ethnic minority residents including the housing needs of elders; increasing the supply of accessible and adaptable housing; and increasing the supply of high quality townhouses, duplexes and flats particularly in city and town centres and accessible locations.
 - b) The SHMA determines the overall housing need for the district based on the NPPF and Government standard method for local housing need (see above). The SHMA also determines affordable housing need by sub-areas based on the Council's Committee Areas (plus City Centre) (see above, Objective 2)). The SHMA also provides sub-area reports based on Census outputs at Output Areas level. The LLP will translate the overall requirements of the sub-areas/settlements to reflect spatial strategy options for distribution and local need. This will seek to update the Housing Mix Policy and also consider setting site specific requirements to deliver housing mix on a site basis.
- 32. For older people;
 - a) Around one in three people in Leeds in 2021 were aged 50 and over, and this number is anticipated to increase. Leeds wants to be a city where people 'age well,' with residents living healthy, independent and active lives for as long as possible. One way this can be supported is to ensure that the older population have access to safe, comfortable and adaptable homes in places where they want to live.
 - b) This may mean smaller houses or flats for 'right-sizers', bungalows or flats with level access or lifts, sheltered housing schemes or care homes, depending on people's individual circumstances and needs. Housing aimed at older people should be located in areas well served with local amenities and community facilities that are easily accessible on foot in 5-10 minutes, and with regular public transport options close by for longer journeys (following the principles of CCC).

- c) The SHMA identifies the need to diversify the range of older persons accommodation including sheltered/retirement, Extra Care and co-housing and calculates 8,805 additional units of accommodation for older people are needed by 2040. This includes 598 residential care bedspaces, 2,061 units of C2 Extra Care and 6,146 C3 dwellings including leasehold sheltered housing. This equates to 489 dwellings for older people are included, and/or specific allocations are made.
- 33. For accessible and adaptable homes:
 - a) An assessment of additional needs and longer-term demographics suggests an increase from 2% to 3.6% of new dwellings should be built to M4(3) wheelchair accessible standard; and that ALL other new dwellings should be built to M4(2) accessible and adaptable standard which would include bungalows/level access accommodation. It is expected that some of this need will be met through the development of C3 accommodation and there is overlap between affordable, specialist older person and M4(3) need. Proposed changes to the Building Regulations (part M) may remove the need for the LLP to consider this, however until that time the LLP will continue to consider this.
- 34. For student accommodation
 - a) The SHMA and research commissioned by the Council and universities with Unipol Student Homes, local students' unions and Leeds Property Association continues to show that Leeds is a popular university city with a large population of both domestic and international students, leading to a mix of accommodation options for range of preferences and budgets.
 - b) Between 2014/15 and 2022/23, citywide full-time student numbers grew by 9,522, up from 50,491 to 60,013 (+18.9 per cent). Information on student number planning indicates future growth of 4,061 between 2022/23 and 2027/28 (+6.8 per cent).
 - c) The supply of student housing has changed dramatically in the last few years with the number of Purpose-Built Student Accommodation (PBSA) schemes that have been built and continue to be proposed in and around the city centre. Between 2014/15 and 2022/23, PBSA bed space numbers in Leeds rose by 5,030 to 23,114 (+27.8 per cent). The expansion of PBSA was at a rate higher than for student numbers over this same period. The PBSA pipeline figures for Leeds to 2027/28 amount to 8,278 and includes developments where approval has been granted (7,663 beds).
 - d) Accommodation costs in Leeds vary based on location, type, and amenities. Evidence suggests that all forms of accommodation are more expensive than ever with the PBSA studio flat product seen as unaffordable for many students, particularly UK-based undergraduates. Evidence suggests that the number of international post-graduates from China are expected to plateau and that demand for PBSA at an affordable price point is likely to grow (post-graduates from India and Nigeria). This indicates the need for the LLP to identify policy options around requiring a mix of studio and cluster flats within PBSAs to improve affordability.
 - e) There has been a shift away from the traditional model of co-living/shared houses (HMO's) in the outer areas (occupied by domestic undergraduates) towards selfcontained studio units in the city centre (occupied by international post-graduates). The LLP will consider options around clarity and definition of 'restriction' of HMO in areas of 'high concentration'.

- 35. Self-build and Custom-built houses:
 - a) The Self-Build and Custom Housebuilding Act 2015 places a duty on Local Authorities to keep a register of individuals and groups seeking to acquire land for self-build and custom housebuilding. This register provides an evidence base of the need and demand for self-build in the city, which the Council should have regard to when carrying out its statutory planning, housing, land disposal and regeneration functions. Local Authorities must give suitable development permission to enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in their area.
 - b) The Leeds Self Build Register currently has 273 live applicants, highlighting significant demand in the city. Supporting self and custom housebuilding through policy will be a crucial element of meeting this identified demand. The LLP will continue to support and facilitate local housing needs where they come forward on smaller sites (including windfall) and additionally options include introducing a % of land on some larger allocations to help facilitate self-build. Design codes and site requirements can help to set this out.
- 36. Large-Scale purpose-built Co-living:
 - a) In the context of space standards and residential quality, a clear policy position is needed to assist in the determination of co-living schemes. The NPPF sets out the Government's planning policies for England and how these should be applied. It seeks strong, vibrant and healthy communities as a key social objective. There is no specific reference to shared housing within the NPPF but local planning authorities are required to make provision for the size, type and tenure of housing needed for different groups in the community, including for those who require affordable housing, students, families, and people who rent their homes.
 - b) In 2023 the Local Planning Authority published a position paper on co-living. This set out the expectations that co-living schemes in Leeds were to be assessed against Housing policies. The LLP will set out options for integrating this into the plan with the option to set out specific minimum standards for large scale purposed built co-living, similar to that set out in the London Plan.

Objective 4. Deliver permanent pitches for Gypsies and Travellers to meet their needs in suitable locations, alongside provision for negotiated stopping pitches for travelling families

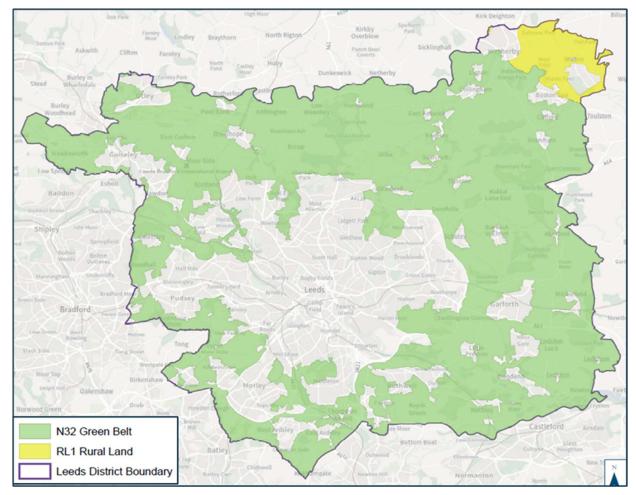
- 37. Whilst the Council set ambitious policies for Gypsies and Travellers in the Core Strategy few have been delivered and there remains a lack of a 5-year land supply which weakens the Council's decision making
- 38. Work is underway with Leeds Gypsy and Traveller Exchange to devise a new need assessment up to 2042. In addition, there is a need for more formalised negotiated stopping places to accommodate temporary visitors to Leeds and those local Gypsies and Travellers who move around the District
- 39. The plan will need to identify and allocate sufficient sites for these specialist needs. Very few site options have been made available to the Council and the consultation will be used to seek more site options from willing landowners and the Gypsy and Traveller community themselves.
- 40. One means of achieving site allocations for Gypsies and Travellers would be to require the largest site allocations in the District to set aside land within/adjacent to their boundaries with

the benefits that this does not impact existing communities and has a better chance of new residents living peacefully alongside Gypsy and Traveller families.

41. In addition, the Council will also consider whether there are any Travelling Showpersons needs for the plan period. There remains a need to deliver a site for Travelling Showpeople which was identified in the previous plan.

Objective 5. Define an updated Green Belt boundary for the District that keeps land permanently open in the countryside and ensures sufficient opportunities through sustainable urban extensions where necessary, to meet its development needs for the plan period and beyond

42. 61% of the District is currently designated as Green Belt reflecting the wide countryside hinterland of the District. The Green Belt aims to prevent urban sprawl by keeping land permanently open, and forms a tightly drawn hinterland around the main urban area and the major and smaller settlements of Leeds. The proposed draft strategy for the LLP suggests that there will be insufficient non-Green Belt in the right locations to meet the development needs of the District and that some Green Belt land release will likely be required. Government guidance requires that local planning authorities consider the role of the Green Belt in meeting development needs in sustainable locations through a review of its boundaries.



- 43. To meet growth needs to 2042, the LLP will determine whether there are 'exceptional circumstances' that would justify the release of individual parcels of land from the Green Belt where insufficient land is identified to meet development needs through other non-Green Belt means i.e. previously developed land, safeguarded land or rural land, and doing so would not fundamentally undermine the overall function of the Green Belt.
- 44. To help inform decisions relating to this, a 'Green Belt Review' is being undertaken (this includes a review of the Rural Land that sits in the NE of the district). This will provide an

objective and evidence-based assessment of the characteristics of the Leeds Green Belt and how different parts of the Green Belt serve the five purposes of the Green Belt set out in national planning policy:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 45. National Guidance came out at the end of February and officers are reviewing LCC's methodology which was previously presented to DPP (5th November 2024). The Green Belt assessment will be one of a number of assessments and considerations which will help determine which Green Belt sites should be allocated for development and/or designated as safeguarded land (which is land removed from the Green Belt to meet potential longer term development needs).
- 46. Alongside the Green Belt assessment, officers have also given initial consideration to 'Grey Belt'. Identifying potential areas of Grey Belt is a separate exercise with a more specific focus on individual areas of land, rather than broad parcels.
- 47. Whilst the overall characteristics of the countryside and landscape in the Leeds district remains unchanged, there are new pressures for development and different uses of the land since the existing policies were adopted. Applications for residential development remain popular in the countryside for conversions and extensions and some new build. In addition the rural economy is changing with a widening range of diversification practices, not just from farmers but other landowners and community groups including golf clubs and sports clubs. Proposals include glamping, holiday lodges, conversions for holiday lets, farm shops, dog exercise parks, driving ranges and paddle board courts. There is also growing demand for renewable energy generation and storage.
- 48. The LLP will set out to rationalise the existing policies that guide development in the Green Belt and set out new policy on the protection of countryside including agricultural land/uses. There may be a need to provide new policy to help shape rural tourism which is currently absent from the plan (linking to Objective 32). There is also a strong alignment between the role of the countryside and strategic Green & Blue Infrastructure (Objective 26).
- 49. In defining a revised Green Belt boundary the Council will also need to consider identifying land that may be released from the Green Belt for longer term growth, beyond the plan-period. This is a requirement of the NPPF and is known as safeguarded land. The Council will consult on a number of options to the approach to safeguarding of land which include:
 - a) The current stock of safeguarded sites and their relative sustainability to meet needs for development when assessed against up-to-date measures: include the new spatial strategy, complete, compact and connected criteria and sustainability appraisal
 - b) The role of windfall and broad locations for growth that are identified within the main urban area such as the expanded City Centre and growth corridors
 - c) The role that Mass Rapid Transit is likely to play in the sustainability of sites for the long term

- d) Considering whether there are specific reasons for safeguarding land for employment uses due to the need to maintain flexibility in meeting the Government's economic growth missions
- e) The return of land to the Green Belt where it does not meet a clear long-term role when measured against the above. Returning the land to Green Belt presents several complexities. Exceptional circumstances are required for any revision to the Green Belt boundary, whether the proposal is to extend or reduce the Green Belt. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify its return to the Green Belt. The Council would need to set out why the reasons for the release of the land from the Green Belt are now permanently different and falsified. There is however, little value in safeguarding land where there is little prospect of it coming forward.

Objective 6. To define an updated settlement network for the District that takes account of the character of different places and their service provision to clarify their role in delivering development

- 50. It is common for Local Plans to define a 'settlement network' as part of their spatial strategy, which groups together places into categories based on their role within the wider district. A settlement network for Leeds is defined in the Core Strategy, and this is being reviewed and updated. The settlement network will be used to help inform the type and scale of development appropriate in different locations. It will, however, not decide or be sole determinant of this. How a settlement is categorised within the settlement network will be considered alongside a range of other factors, including the specific / local development needs, what potential sites there are for future development and the extent to which these are suitable, deliverable and align with other policies and objectives, in order to reach conclusions about the extent of development that the LLP could or should support in each place.
- 51. To define the settlement network a wider variety of data and information that is relevant to understand the role of places has been collated on a settlement basis. Much of this draws on the information about the location of services and facilities that underlies the 'complete, compact and connected' places approach.
- 52. It is proposed that there would be 6 'tiers' to the network, as follows:
 - a) **Leeds Main Urban Area**: this includes Leeds City Centre and the neighbourhoods and communities that make up the inner and suburban areas of the City. It includes a diverse mix of communities and neighbourhoods which each have their own distinct characters and identities, and come together to form the Main Urban Area of Leeds.

There have been no significant changes to the role of function of the places within the main urban area since a boundary for it was established through the Core Strategy. As such, it is proposed that those areas defined as forming the Main Urban Area in the Core Strategy will continue to form the Main Urban Area in the LLP, with minor amendments to the boundary, to take account of more recent development.

b) Major Settlements: it is proposed that Garforth, Guiseley/Yeadon/Rawdon, Morley, Otley, Rothwell and Wetherby would be defined as 'Major Settlements'. They are a significant focus for people, homes and services, with each having over 5,000 homes, a range of educational establishments (including nursery, primary and secondary schools), office, industrial and other commercial premises, multiple primary care facilities, a range of community facilities (such as libraries, community centres and sport/leisure facilities), and a significant range of shops (including a supermarket).

The proposed 'Major Settlements' for Leeds Local Plan are the same places as were defined as 'Major Settlements' in the Core Strategy, with minor amendments to the boundary, to take account of more recent development..

c) Smaller Settlements: it is proposed that Allerton Bywater, Barwick in Elmet, Boston Spa, Bramham, Bramhope, Calverley, Collingham, Drighlington, Gildersome, Kippax, Lofthouse / Robinhood, Micklefield, Mickletown / Methley, Scholes, Swillington and the urban area formed by Tingley / West Ardsley / East Ardsley would be defined as 'Smaller Settlements'. They are a local focus for people and homes (having at least 750 existing dwellings) and for commercial premises, shops and facilities, and each have a primary school, doctors surgery and convenience store.

In the Core Strategy Tingley and West Ardsley were grouped together as a Smaller Settlement, and East Ardsley was also defined separately as a Smaller Settlement. It is proposed that all three areas are now be grouped together, reflecting that recent development has significantly reduced the gap between them.

Bardsey and Pool-in-Wharfdale were categorised as Smaller Settlements in the Core Strategy, but do not meet the proposed criteria for identification as Smaller Settlements in the new Leeds Local Plan. This is because they do not have each of the key local services required: a primary school, GP practice and a convenience store. Conversely, whilst Harewood does have each of these facilities the number of dwellings is significantly below the minimum 750 threshold, which limits the extent to which it functions as a local focus for homes like the other Smaller Settlements. It is proposed that Pool-in-Wharfdale be moved to a defined village category, and Bardsey the Countryside category (as a non-defined settlement).

- d) **Defined Villages**: it is proposed that Aberford, Harewood, Pool-in-Wharfedale, Shadwell, Thorner, Thorpe on the Hill and Tyersal would be 'Defined Villages'. These are places that have a basic level of services and facilities, including at least four in the following categories:
 - (i) Transit stop (i.e. bus or rail stop)
 - (ii) Nursery
 - (iii) Primary School
 - (iv) Doctor's surgery
 - (v) Park, pubic green space, playground or recreation area
 - (vi)Pharmacy
 - (vii) Convenience store

The threshold for classification as a 'Defined Village' is having a minimum of four of the above. This recognises that, whilst different places may have different combinations of these facilities, villages with four or more of these are beginning to have a mix of basic amenities that should provide opportunities for residents to meet *some* of their day-to-day needs locally.

The Core Strategy categorised 'all other settlements' (i.e. places other than the Main Urban Area, Major Settlements and Smaller Settlements) as Villages, though did not specifically name or define boundaries for these places. It is proposed that the new LLP would specifically name and define boundaries for the Defined Villages (as above), distinguishing them from other settlements that have few (if any) facilities. This recognises that there are local needs for new homes (or other forms of development) in more rural parts of the district, and in planning for sustainable development it is helpful to make a distinction between those villages that have some (albeit limited) facilities within them, and those that have very limited (if any) facilities. e) **Strategic Employment Hubs**: it is proposed that Thorp Arch and the North West Employment Hub (Leeds Bradford Airport) would be defined as Strategic Employment Hubs. These are places that form a significant focus for employment (>10ha) that do not form part of a settlement.

Strategic Employment Hubs are not defined as part of the Settlement Network in the Core Strategy, but are proposed to be added in the new Leeds Local Plan to better reflect the role of these places as a focus for employment and the potential that they may hold for development over the plan period.

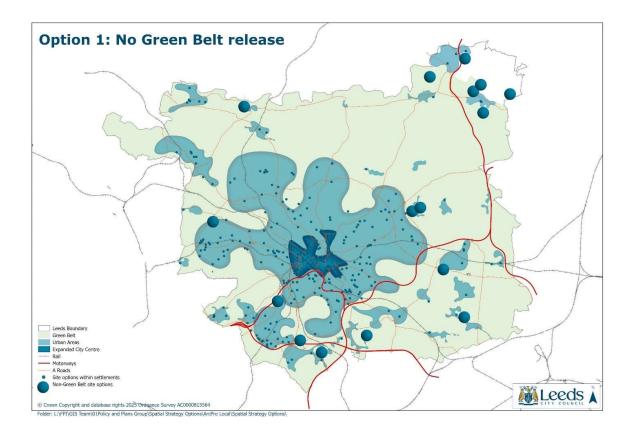
f) **Countryside:** the remaining area of the district would be categorised as 'Countryside' for the purposes of the settlement network.

This would include small villages such as Bardsey, Carlton, Clifford, East Keswick, Great Preston, Ledsham, Ledston, Linton, Little Preston, Methley Junction, New Farnley, Thorp Arch, Scarcroft, Walton, along with other standalone residential areas detached from main settlements (such as Horsforth Vale, Carrwood Park (Tyersal), Troydale, Upper Moor Side, the areas north of East Ardsley and South of Oulton), and the wider countryside.

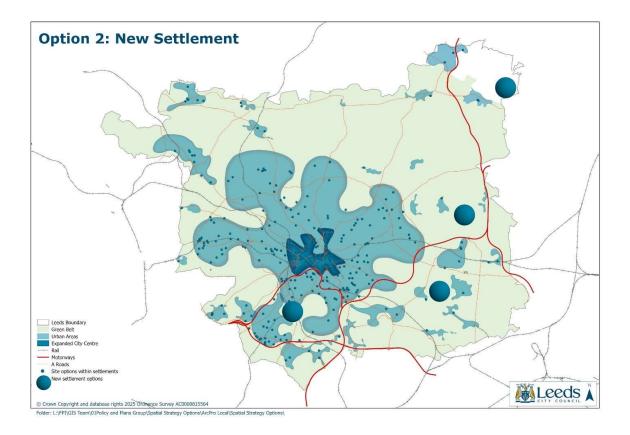
These smaller settlements have limited services and do not form sustainable places for growth. It is proposed that other than infill development, any significant development in these locations may be determined on a case-by-case basis and/or clarified through Neighbourhood Plans.

Objective 7. Deliver housing, in the right places, to maximise the benefits of investment and realise opportunities for positive local change.

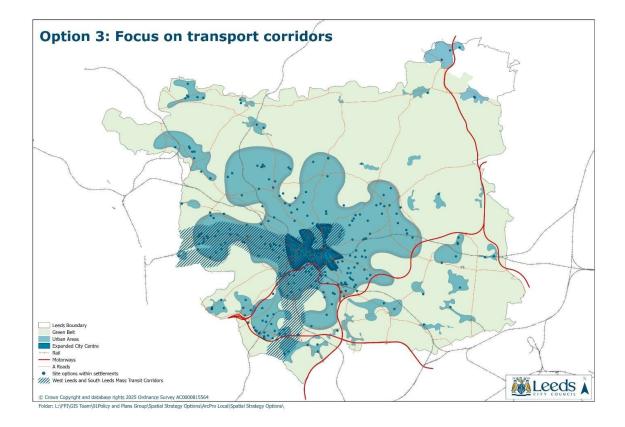
- 53. Leeds has a diverse geography, made up by the City of Leeds itself alongside a variety of towns and villages. In recent years record levels of housing growth has occurred in Leeds with over 4,000 homes in 2023/24, but this has largely been directed to the development of flats and apartments in the City Centre. At the same time, opportunities in the outer areas have generally been much more limited. This will be partly due to the fact that no Green Belt sites were released for housing development by the Site Allocations Plan (2019).
- 54. The LLP will set a framework for directing the development of new homes across the district up to 2042 to meet the overall LHN requirement. There are four broad options for distributing development, and views will be sought through the consultation on whether the Council should:
 - i. Avoid Green Belt: this would make use of existing allocations and planning permissions, realise opportunities to expand the City Centre and develop on sites within settlements and the main urban area, and seek to meet remaining needs for development on non-Green Belt choices e.g. rural land and safeguarded land (removed from the Green Belt through the Unitary Development Plan). This would have advantages in avoiding impacts on the Green Belt, but would not meet local needs for a range of housing of different types and sizes in all parts of the district (as not everywhere will have sufficient and/or suitable infill opportunities). The evidence also suggests that there would be insufficient sustainable sites available to meet needs under this scenario.



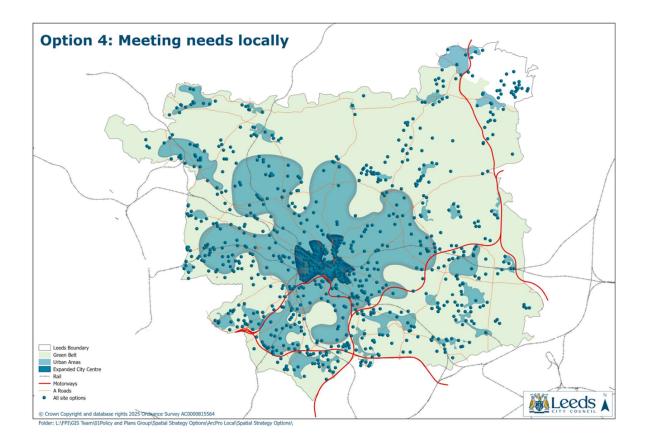
ii. Create new settlement(s): this would make use of existing allocations and planning permissions, realise opportunities to expand the City Centre and develop on sites within settlements and the main urban area, and seek to meet remaining needs for development through the creation of a new settlement. Four suggested locations for a new settlement have been identified through the Call for Sites and submissions to the Government's New Towns Task Force (at Thorp Arch, Parlington, North of Great Preston, and South Leeds). This would have potential advantages in focussing a significant proportion of development in one part of the district, creating critical mass to support a range of new services and facilities being developed alongside new housing (and likely cater for some longer-term needs for housing beyond the plan period). However, it would not meet local needs for a range of housing in all parts of the district, and the amount of development and upfront investment required to create a sustainable community would be significant and likely have a long lead-in time, limiting the number of new homes it would deliver in the plan period. There is also a Government expectation that new towns would solve a national rather than a local housing need and therefore be in addition to LHN. The City Council is also engaged with Government on an expanded City Centre which would bring the benefits of higher numbers of homes in new neighbourhoods with ready access to services and infrastructure in a highly sustainable location.



iii. Focus on new (Mass Transit) growth corridors: this would make use of existing allocations and planning permissions, realise opportunities to expand the City Centre and develop on sites within settlements and the main urban area, and seek to meet remaining needs for development in and around the proposed Leeds-Bradford and Leeds-South Leeds (Dewsbury) mass transit lines. This would have benefits in aligning future growth with investment in transport infrastructure, and take advantage of the land value uplifts that will be associated with the major investment and connectivity improvements that Mass Transit would bring. However, it would not meet local needs for a range of housing in all parts of the district, and there could be risks associated with allocating sites that would only be suitable once Mass Transit is operational given that the scheme is not consented at this stage.



iv. Meeting needs locally: this would make use of existing allocations and planning permissions, realise opportunities to expand the City Centre and develop on sites within settlements and the main urban area, and seek to meet remaining needs for development through the expansion of settlements (including through the release of Green Belt land) to meet housing needs locally on suitable sustainable sites. This would have benefits in enabling local needs for different types of housing (including significant affordable housing) to be met close to where they arise, and may also help to support the ongoing viability of existing services and facilities within towns and villages. However, it may result in localised impacts on the character of towns and villages, and put pressure on existing infrastructure. The map below shows all the sites that have been submitted to the Council through the Call for Sites exercise. The Council does not need to allocate all of these to meet its LHN and the approach to site selection set out in the July 2024 DPP paper will be used to help assess and guide release. The scoring of these sites will be made available as part of the consultation.



- 55. At this stage it is proposed that the preferred approach to be consulted on should be a mix of options i, iii and iv, because this would:
 - a) make use of existing allocations and planning permissions,
 - b) realise opportunities to expand the City Centre and develop on sites within settlements and the main urban area,
 - c) utilise suitable and sustainable sites that are currently designated as rural land or safeguard land,
 - d) maximise existing transport infrastructure,
 - e) maximise opportunities associated with the proposed Mass Transit corridors,
 - f) meet local needs for development,
 - g) assist an objective to significantly increase affordable housing delivery,
 - h) maximise brownfield land and opportunities for densification within urban areas,
 - i) ensure that a wide range of size, types and sizes of new homes were available to the market, opening opportunities for different developers to build out at the same time and giving increased confidence that Government delivery targets could be met throughout the plan period.
- 56. To generate localised (i.e. settlement level) housing requirements for different parts of the District, it is proposed that the Government's LHN method (the existing housing stock plus 0.8% alongside evidence on affordable housing needs) be applied to the sub-areas and settlements within the District this will generate a starting point for a community housing need. To this figure it is proposed that a 10% buffer be added (as set out in Objective 1) for

the purposes of finding the right level of identified and allocated land to meet the need. Account will then be taken of current supply (e.g. development that has occurred since 2022, which is the start of the plan period, along with extant planning permissions and allocations) and windfall potential, in order to arrive at a starting point for considering the amount of development needed in different locations. The Council will also consider the deliverability of such supply against the requirements of the NPPF so that sites that a part of the plan are likely to come forward.

57. It is recognised that the amount of new homes that the LLP should direct to different locations will need to take into account a wider range of factors, including the role of the settlement, the potential sites there are for future development and the extent to which these are suitable, deliverable and align with the objectives of the Plan, and the extent and capacity of social and physical infrastructure – these factors will be considered through the consultation.

Objective 8. Identify locations to deliver at least 650,000 sqm office floorspace, focussed on the expanded City Centre and public transport hubs, to meet the needs of commercial businesses

- 58. Leeds remains the key office focus in the sub-region with significant headquarters of national and international companies within the District. The City Centre is the prime location for offices, but there are key office parks across the District. Unsurprisingly given the pandemic and changes to working patterns as of 2023, Leeds had a decline of 0.4% of the total stock. This indicates that more office space was lost through demolitions, redevelopment or changes of use than was gained through new development. However, there is a need to plan effectively for higher quality "Grade A" office space over the longer term and using past take up figures and employment forecasts from Regional Econometric Model alongside other information from the Employment Land Needs Assessment, it is considered that at least 650,000 sqm is required to be identified.
- 59. Leeds has a current supply of office floorspace, which will be assessed to ensure it is deliverable and market facing. This supply can be used to reduce the overall need for new locations.
- 60. These emerging policy options to be consulted on, include whether the Council should:
 - a) identify land and/or locations to deliver office floorspace of at least 650,000sqm
 - b) identify key locations for office development e.g. the Leeds Innovation Zone, the City Centre where offices are encouraged where significant numbers can be delivered
 - c) identify public transport hubs (e.g. Kirkstall Forge, White Rose Office Park, Thorp Park) where office activity is encouraged
 - d) carry forward deliverable and market facing commitments and allocations from the existing plan (580,000 sqm) and look flexibly on what other uses may be appropriate in sites and buildings that haven't come forward but may be suitable for other uses
 - e) maintain an approach to supporting small scale office development in existing town and local centres to meet local needs

Objective 9. Support the delivery of retail and leisure developments in the expanded City Centre, local and town centres and in key public transport hubs and as part of mixed-use allocations

61. There are few signs in the Council's evidence or the Regional Econometric Model that there is a significant need for new retail or leisure floorspace in the District. However, given the systemic changes within these sectors following the pandemic and shifts to on-line shopping,

it is appropriate to retain a flexible approach within the right locations. Therefore, the new plan will support retail and leisure only in sustainable locations, which are well served by public transport, related to major residential development or remedying deficiencies in poorly served parts of the District, as part of a complete, compact and connected approach.

- 62. Planning plays a vital role in providing safe and healthy places and the lack of access to healthy food, a proliferation of unhealthy food choices and the ever-evolving nature of food delivery/ takeaways can create unsafe and unhealthy built environments for everybody. Nationally and locally, the negative impacts of child and adult obesity have become worse and planning for healthy food environments can help mitigate against them.
- 63. The LLP consultation seeks views on whether the plan should build upon the current Hot Food Take Away (HFTA) SPD which currently focuses on the proliferation in centres and controls around secondary schools and impacts on local amenity. New policy could strengthen existing controls. Following changes to the NPPF the Council needs to provide clarity on how to interpret Para 97 part a) and b) in particular around the issues of "places where children and young people congregate" and "evidence of concentration".
- 64. It is intended that the emerging policy options set out in LPU continues the approach of seeking to strengthen the controls on drive thru' proposals outside of centres.
- 65. The LLP consultation will give the industry the opportunity to tell us firstly, if they consider a retail and leisure target and new allocations are necessary and for supermarket and other leisure operators to express their long-term plans for new sites in the District.
- 66. As part of this approach and particularly in the expanded City Centre (see Objective 32), within broad locations/opportunity growth corridors building upon the Complete Compact and Complete principles of neighbourhoods (Objective 22) the new plan will recognise the role of appropriate retail and leisure uses in active ground floor frontages (including mixed use schemes) to serve local neighbourhoods and improve the vitality and viability of places.

Objective 10. Identify sites and locations to deliver a minimum of 2.25 million sqm of floorspace (approximately 650ha in land terms) for industrial and logistics uses, to contribute towards the national industrial strategy and meet the sectoral needs of the local and regional economy

- 67. Leeds is the largest core city in West Yorkshire and a key driver of economic activity and employment for the region. Monitoring shows that the existing supply of general industrial land within the District doesn't reflect current needs, and this is likely restricting the delivery of additional premises and floorspace. To support our economic growth ambitions, support innovation, improve productivity and secure local jobs, there is a need for additional industrial floorspace to enable new businesses to establish in the district, and existing businesses to grow and expand.
- 68. The local Employment Land Needs Assessment based identifies a need for a minimum 1.35 million sqm of floorspace (based on past take up) which rises to 2.25 million sqm (when adjusted to take into account HS2 safeguarded land and the relative underperformance of Leeds relative to national benchmarks). Moreover, the need to reflect the Government missions for economic growth and the latest changes to the NPPF warrant the District aiming for a higher level of industrial land.
- 69. The Council already has an estimated 1.15million sqm of existing floorspace for industrial uses on sites which remain deliverable, including allocations, sites with planning permission and completions since April 2022. Therefore, it will not need to allocate all 2.25 million sqm in the LLP.
- 70. The new LLP will set a policy framework that supports the delivery of industrial floorspace through a range of opportunities. This will need to be sectorally focussed so that a specific

sector e.g. logistics does not consume more than its fair share of new locations. The plan will need to reflect the WY Local Growth Plan with a focus on emerging tech, green economy and advanced manufacturing by taking into account the specific locational and/or land requirements for businesses within these sectors.

- 71. Monitoring shows that the current safeguarding policy of the Core Strategy, which seeks to retain all sites currently in (or allocated for) employment use, is not wholly effective. The preferred approach would be to identify the specific industrial areas that of strategic and local importance within the District, and seeks to restrict their development for other uses, whilst allowing for changes of use elsewhere. This recognises that the LLP needs to strike a balance between competing needs for land (e.g. brownfield housing, commercial / leisure development).
- 72. These emerging policy options to be consulted on, include whether the Council should:
 - a) set a higher industrial and logistics floorspace target than 2.25m sqm (650ha) to reflect growth ambitions
 - b) include an additional margin of 10% when allocating and identifying land to allow for choice within the market and for unforeseen site delivery and macro-economic impacts
 - c) respond specifically to the needs of key growth sectors, including those identified as being important to a modern economy by the NPPF (e.g. laboratories, gigafactories, data centres, digital infrastructure, freight & logistics) and those identified in the WYCA Local Growth Plan as key high-growth clusters for the sub-region (emerging tech, green economy and advanced manufacturing) by taking into account the specific locational and/or land requirements for businesses within these sectors and identifying locations and allocations for specific uses and/or mixed-uses;
 - ensure that a mix of sites is allocated to meet the requirements of different types of businesses, including through making provision for strategic employment sites that provide opportunities for large-scale development, and local employment sites that cater for smaller-scale needs
 - e) safeguard existing employment sites of strategic and local importance and allow for losses of industrial land to support the overall LLP strategy for locating housing and new neighbourhoods (alongside supporting land uses) in sustainable locations across the District and in an expanded City Centre.

Objective 11. Ensure a steady and adequate supply of the minerals that are needed in Leeds, maximising the use of secondary and recycled aggregates, and marine aggregates.

- 73. Minerals are important to the local and national economy and underpin the fabric of our everyday lives. In Leeds mineral use includes building stone, brick clay, concrete and other construction products. Aggregates, which also include crushed stone, play an important part in construction and are therefore essential to the growth of the District.
- 74. The Plan needs to ensure that Leeds has a steady and adequate supply of the minerals that are needed, whilst ensuring that best use is made of them to secure their long-term conservation. The use of secondary and recycled aggregate helps to make the best use of scarce resources.
- 75. The Marine Aggregate Study 2022 commissioned by the West Yorkshire Combined Authority identified significant potential for more marine aggregate to contribute to supply in West Yorkshire.

- 76. The Council has existing allocations for sand and gravel extraction and land which is identified as an area of search for new sand and gravel extraction. LLP will clarify the appropriate designations through the plan period reflecting market interest and a need to identify an adequate and steady supply.
- 77. For sandstone and limestone the Council has preferred areas, which can continue to fulfil a role in mineral supply. The NPPF identifies coal and shale gas as mineral resources of national importance that should be safeguarded, however given the Council's Net Zero ambitions the Council will consider whether coal and shale gas should play a role in the mineral needs for Leeds (taking account of the end users of these minerals and their carbon emissions).
- 78. The LLP will consult on the following proposals:
 - a) That land in Leeds will be identified to meet needs for the plan period on the basis of existing allocations and areas of search within the District, the sub-region, the use of secondary minerals and the use of marine aggregate.
 - b) Whether there is a need to identify coal and shale gas extraction proposals in Leeds given the Council's Net Zero agenda, alternative low carbon forms of heat and power, and the local carbon budget impacts that such extraction would result in.

Objective 12. Avoid the sterilisation of minerals that may be needed in the future

- 79. This is about ensuring that other land uses and developments do not sterilise the ability of minerals to be extracted in the future.
- 80. Sand and gravel remains an important mineral resource for the district and should continue to be protected from sterilisation. Clay is abundant in Leeds and reserves are sufficient to support need well beyond the plan period such that a mineral safeguarding area is not needed for clay.
- 81. Whilst national policy regards coal and shale gas to be minerals of national importance, given the negative consequences of burning fossil fuels there is a case to consider whether Leeds should have mineral safeguarding areas for coal and unconventional shale gas at all, particularly as other forms of energy are now more advanced as a source of energy and the impacts that their extraction would have on the Council's Net Zero ambitions.

Objective 13. Reduce waste and increase recycling and energy recovery from waste within the district by providing sufficient waste management facilities in the right locations

- 82. Leeds continues to plan for a major reduction in landfill and a significant increase in more efficient forms of waste management. The Council aims to deliver the land that is needed for the waste hierarchy and to achieve Zero Waste.
- 83. From initial evidence work the Council considers that there will likely be a need for new waste recycling facilities in the District (e.g. composting, glass recycling and construction, demolition and excavation waste recycling and washing). The LLP will seek to identify sites in appropriate locations, and some have been submitted to the Council for assessment as part of the Call for Sites. These will be clarified as part of the consultation.

Objective 14.Be better connected by maintaining and enhancing an accessible and
integrated transport system that links people to jobs and services

84. Achieving a well-connect West Yorkshire with a strong transport system is one of the five missions of the West Yorkshire Plan. As part of this, there is an ambition to create a leading integrated transport system across the sub-region that connects different modes of transport

(including bus, road, rail, mass transit, walking and cycling and car) seamlessly as part of a comprehensive, easy-to-use, network. This recognises that transport is an essential part of daily life and how we travel impacts our health, the environment, the economy and our social lives, and that freight transport is essential to keeping our economy moving.

- 85. The LLP has an important role to play in delivering this ambition, working alongside wider transport planning strategies, including the Local Transport Plan developed by WYCA and the Connecting Leeds Strategy (and associated Action Plan) developed by the City Council, and will provide the spatial planning framework for supporting accessible and integrated transport networks. This includes through directing development to locations where it can support or stimulate opportunities for new, or better integrated, sustainable transport options (linked also to objectives 21, 22 and 23 below), providing support to proposals that seek to enhance transport provision and requiring improvements to be made to transport provision where this is necessary to make a development acceptable (which could include making financial contributions to support the viability of key bus services).
- 86. The plans for a West Yorkshire Mass Transit Network being advanced by WYCA presents a significant opportunity to better connect places across West Yorkshire, enabling people to better access jobs, education and opportunities right across the sub-region. Inline with the approach proposed through LPU1, it is proposed that the LLP will set strategic support for the development of the West Yorkshire Mass Transit Network in Leeds, and provide a framework for ensuring that weight is given to emerging proposals to ensure that developments that would prejudice its implementation will be refused. Once detailed routes have been determined, the Plan could also seek to formally 'safeguard' these routes from alternative development.
- 87. It is also proposed that, in line with the approach that was being taken through LPU1, the LLP would identify key principles that proposals for new mass transit or rail infrastructure would be expected to accord with to ensure that any potential adverse environmental, social and economic impacts are mitigated and minimised, and that any potential benefits or opportunities are maximised. This includes by responding the distinct characters of places along the line, integrating new green and blue infrastructure around the line, supporting permeability along the route corridor, protecting or enhancing heritage assets, minimising flood risk and incorporating sustainable urban drainage and encouraging temporary 'meanwhile uses' of land affected by long term construction projects where appropriate.
- 88. As a regional airport, Leeds Bradford Airport provides a significant role to the Leeds City Region and the District as it forms part of the strategic infrastructure and a major economic driver for the Leeds City Region. The Council's current policy encourages a well-connected and accessible airport by sustainable forms of transport and surface access improvements to support the growth of the airport are one of the District's existing spatial priorities. This will be maintained. LBA is currently within the Green Belt and as part of the Council's assessment of Green Belt land it is noted that much of the airport does not contribute to the Green Belt. The LLP will consult on options to retain, remove and amend this boundary.
- 89. Air travel is a major contributor to greenhouse gas emissions, both through flights and travel to and from the airport. The Leeds Local Plan already contains a policy (SP12 of the Core Strategy) on the airport which is supportive of growth to enable the airport to fulfil its local and regional role, provided that a series of criteria would be met. These criteria address a need for major public transport infrastructure, surface access improvements and a strategy to guide this, environmental assessment and mitigation and management of local issues. The LLP will consult on whether these criteria remain appropriate as a basis for considering proposals at the airport.

Objective 15. Sustain and protect valued community facilities

- 90. Community facilities, such as education, training, places of worship, health, sport and recreation and community centres, have a really important role within neighbourhoods, providing opportunities for social interaction and access to services, and supporting community cohesion. They are also a key means of fostering the cultural health of places.
- 91. The LLP continues to seek protection of existing and provision of new facilities and further recognises the importance of these facilities within the Complete, Compact and Connected approach. Wider market factors often lead to loss (e.g. pubs) and there is only so much the land-use planning system can do in its focus on the land use and building, as opposed to specific facilities themselves.
- 92. However, the LLP will seek to plan positively for arts and cultural facilities (as set out in the Leeds Cultural Strategy) through measures which could include: approaches to design (e.g. public art), regeneration (particularly in the expanded City Centre) and site requirements on strategic new developments, alongside the identification and protection of existing cultural facilities⁵ by considering how to resist their loss and/or seek re-provision for valued community arts and cultural assets.
- 93. It is intended that the emerging policy options for the LLP continues the approach to community and social infrastructure and will ask consultation questions around opportunities of being more prescriptive in seeking mixed-use provision, with the opportunity to seek to address plot/building formation (retention) for social infrastructure through site requirements on allocated sites (above a certain threshold) or within Broad Locations.

Objective 16. Sustain and enhance important heritage assets

- 94. Across the Leeds district there are over, 3,300 listed buildings and 81 conservation areas, as well as Historic Parks & Gardens and a wide variety of non-designated heritage assets and archaeological sites. The historic environment is one the key contributors to character and identity of places across the district, and it will be important that the Plan continues in seeking to conserve and enhance this.
- 95. There are a total of 20 existing planning polices relating to heritage across the UDP and Core Strategy. The LLP presents a significant opportunity to streamline the policy approach for the benefit of all plan-users, ensuring that the terminology used reflects up-to-date national policy and guidance, and ensures that new development strikes an appropriate balance between preservation and change, taking opportunities to enhance heritage assets wherever possible.
- 96. The LLP will reflect on the opportunities such buildings have for being brought back into use (not just residential but also the role they play in local community, economic and cultural provision), which links across to policies around retaining and providing for community use (see Objective 15) but ensuring development takes place in sustainable locations and uses previously developed land efficiently. The opportunities for taking advantage of reusing old buildings (adapting historic buildings for energy and carbon efficiency) is also a key consideration.
- 97. The new spatial strategy promotes growth in areas of the District that have Conservation Areas and stocks of listed buildings e.g. the expanded City Centre. The LLP (including the Design Code) will set a framework for how such growth works alongside these assets and their value.

⁵ This can include Assets of Community Value that are registered with the Local Planning Autority under the Community Rid to Bid (Localism Act, 2012)

Objective 17. Secure the delivery of high quality, sustainable and resilient places that people of all demographics want to live, work and play in

- 98. High quality design and place-making is essential in creating places in which current and future generations can enjoy a high quality of life, and has an important role in addressing climate change, energy use, car dependence, community cohesion and health & wellbeing. In order to continue its economic success and grow sustainably, Leeds must build upon and retain the high quality of its built, historic and natural environment.
- 99. It is intended that the emerging policy options for the LLP continue the approach of the 'placemaking' chapter of the Local Plan Update through the introduction of new policies that ensure that all development achieves a high-quality design (buildings and spaces (open space and landscaping)) by setting clear expectations for developments in relation to a variety of design considerations. As part of this, it is also proposed that the LLP will introduce new policy seeking assessments of the health impacts of developments, in line with the approach previously proposed through LPU1
- 100. The LLP will look to introduce key principles to help embed the ambition of Leeds to be a 'Child Friendly City' which crosses over many of the objectives of the plan around high quality design of space and place (homes and green spaces) access (linking to Vision Zero and Connecting Leeds Transport Strategy and active travel options) and reflects the Play Sufficiency work of Leeds City Council.
- 101. The principles for designing for High Quality places doesn't just reflect the need to plan for children and young people, the LLP will also embed principles around the elderly and those with mobility needs, as well as gender inclusivity (women, young girls and gender diverse people), many of the principles between these groups in regard to safety, access etc are shared.
- 102. The LLP will be complemented by a city-wide Design Code which sets out a range of rules and guidelines for the design of new development in a variety of local character areas. The city-wide Design Code will be complemented by specific area-based codes where significant change is envisaged such as the expanded City Centre and major development sites.

Objective 18. Increase the amount, quality and accessibility of green space across the district to help address local needs

- 103. Over 1,600 sites are currently designated as 'green space' across the district and serve a vital role as a place for sport, play and recreation, as landscape buffers within and between the built environment, and as a habitat. As the population increases it will be important to protect existing green spaces, and create new ones, to meet the needs of local people.
- 104. It is intended that the emerging policy options for the LLP continue the approach of the 'Green & Blue Infrastructure' chapter of the Local Plan Update through the introduction of new policies that ensure that all development achieves a high-quality provision of, or enhances, local greenspace. Further to the scope of the Local Plan Update work, the LLP will update the baseline of green space designations and review the current policy on green space accessibility and quantity standards so that this better aligns with the CCC approach (see Objective 21).
- 105. Linked with Objective 16 the LPP will set out principles for high quality open and green spaces and this could include integrating into Design Policies or setting out a new policy to specifically identify opportunities to assess the playfulness of places and new development reflecting upon the work that Child Friendly Leeds and Active Leeds are leading on for "Play Sufficiency". This is a project that brings together partners from across the city to champion children's right to play and is much more than thinking about play just in play grounds. Options to include this could alternatively sit within the Desing Code work.

Objective 19. Direct a significant proportion of development to locations where it has potential to stimulate and support wider investment, regeneration and inclusive growth

- 106. The Plan will have a very important role to play in supporting positive change in neighbourhoods across the district, working alongside partners and funders. It is recognised that there is significant inequality across Leeds, and the poorest people in the district are not always benefiting directing from growth. Since the adoption of the Core Strategy the number of neighbourhoods in the district that are classed in the 10% most deprived nationally has increased, and whilst the planning system is not able to address all of the issues leading to this, the Plan does present opportunities to consider how development can be directed to locations where it has potential to deliver wider benefits, through supporting and stimulating investment, regeneration and inclusive growth.
- 107. The 'Leeds Transformational Regeneration' partnership that the Council has entered into the with Government, Homes England and the West Yorkshire Combined Authority (WYCA), presents a particular opportunity for growth and regeneration in and around the City Centre which the Plan will need to facilitate and support. Similarly, the major infrastructure investment associated with the development of the West Yorkshire Mass Transit network will significantly improve connectivity in parts of the district and stimulate land value uplift that may stimulate (re)development opportunities around the line.
- 108. It is proposed the LLP should identify 'opportunity areas' in response to the significant opportunities expected to arise in three areas. These are proposed to cover:
 - a) an expanded City Centre, which includes the existing City Centre along with areas where investment is proposed through the LTR programme),
 - b) a South Leeds corridor, which includes areas surrounding the proposed Leeds-White Rose Mass Transit route, extending from the south of the City Centre, through Holbeck and Elland Road to the White Rose Office Park and White Rose Centre and extends further towards Dewsbury in acknowledgement of the aspiration for this line to be extended as part of future MT phases
 - c) a West Leeds Corridor, which includes areas surrounding the proposed Leeds-Bradford Mass Transit line.
- 109. For these areas, the emerging policy options to be consulted on, include whether the Council should:
 - express an overarching vision and objectives for development within each opportunity area, and focus particularly on how individuate sites will come together to create new or changed places, recognising the potential that development may come forward on multiple sites within an area and that considering them together may enable greater benefits to be delivered (e.g. pooling of green space requirements to create a single larger space rather than a multiple smaller spaces on each site)
 - b) define 'broad locations' around areas where there may be potential for future change and development, but there is not yet the certainty required to allocate individual sites for development for specific uses. This will provide a clear signal to communities and prospective developers / investors that the Council would be supportive of development proposals coming forward in these areas, and enable high level requirements / expectations for this development to be set out in the plan.
 - c) review whether the proposed general approach of the Plan to safeguard existing employment areas of strategic or local importance should apply to employment areas

in these locations, or whether there may be opportunities for the redevelopment of some (or part) of these areas for alternative uses, having regard to their sustainability, potential land value uplift, and wider plan objectives relating to making the most effective use of previously developed land.

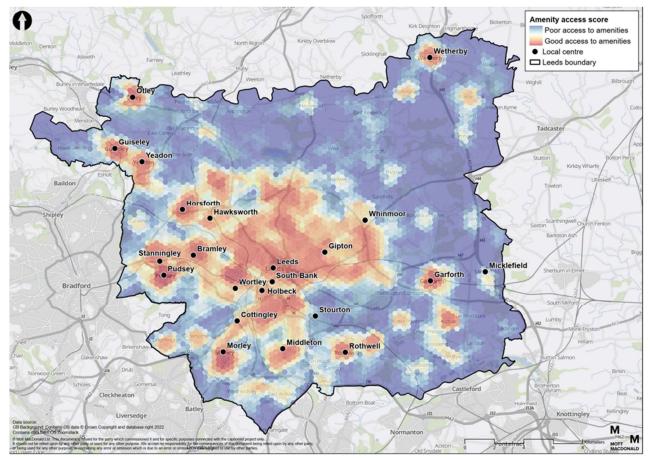
Objective 20. Align development with existing and planned infrastructure investment, ensuring that all development is adequately supported by the necessary social and physical infrastructure.

- 110. Infrastructure can take many forms, and includes 'social' services (such as schools, health and social care) and 'physical' provisions (relating to utilities, water supply and treatment, energy, roads and transport). The development of new homes or business premises will place additional pressure on existing infrastructure, and the Plan will need to identify where investment in infrastructure improvements will be necessary in order to support the planned growth, and seek to coordinate its provision and delivery. Whilst new development cannot be expected to address existing issues, the Plan will need to respond to the capacity of the existing infrastructure, and identify where new development would be contingent on new or improved provision.
- 111. The majority of infrastructure is delivered and managed by bodies that sit outside of the Council, such as the NHS and utilities providers. This means that there are limits to how much the Council is able to directly control. The LLP will seek to manage this through the development of an Infrastructure Study and an Infrastructure Delivery Plan (IDP) that identify the key infrastructure requirements which will be needed to support the new development that is proposed in the Plan. The IDP will provide an overarching framework for other service providers plans and programmes, to bring them into one place and ensure that all providers are planning for the proposed levels and locations of growth. The preparation of the Infrastructure Study and IDP is undertaken in partnership with a number of key providers, including the energy and utilities companies operating in the area, Highways England, telecommunications providers, the NHS and the Environment Agency, as well as wider services within the Council, including Children's Services and Highways.
- 112. The delivery of, and funding for, necessary infrastructure improvements will come from a variety of sources. This includes continued investment in infrastructure provision (to both address existing issues and cater for future growth) by the infrastructure providers, as well as through seeking and bidding for funding from Government to support specific projects or programmes. The development industry will also contribute towards the provision of infrastructure necessary to support growth in three main ways:
 - a) Community Infrastructure Levy: The Council requires the majority of developments to pay payments to the 'Community Infrastructure Levy' and this is used to deliver strategic infrastructure. In 2023/4 £9.8m was collected through the CIL, with £1.5m going to Town/Parish Councils and Community Committees as part of their neighbourhood fund. CIL monies are used to help fund strategic infrastructure across the District, including the Flood Alleviation Scheme and education.
 - b) S106 contributions: Developers also provide financial contributions through Section 106 (or s.278 for highways) legal agreements where it is considered that a development will have impacts that cannot be mitigated through conditions in the planning permission. In 2023/4 a total of £8.97m was received from planning applications through s106 and used to support the provision of infrastructure required as result of the development, such as highways, green space and education.

- c) Direct delivery by developers: In some instances developers also deliver new or improved infrastructure directly as part of their development (e.g. highways improvements).
- 113. It is, however, recognised that securing all of the funding needed to enable the improvement of infrastructure over the plan period is likely to be challenging, and requires the IDP to identify and prioritise 'essential' requirements as well as 'desirable' improvements.
- 114. At this stage in the plan-making process no decisions have been made about the amount of growth (or the specific sites) that will be developed in specific locations. As such, the work to date on the Infrastructure Study has focussed on the baseline capacity of infrastructure across the District. As the plan develops, this will be refined and the specific impacts on the plans proposals will be assessed, and enable the infrastructure constraints and requirements arising from this to be identified within the Plan, site requirements for particular sites, and the IDP.

Objective 21. Focus the majority of new homes in complete, compact and connected places where people have opportunities to walk or wheel between homes, shops, services and green spaces.

115. Complete, compact and connected places is based on the '20 minute neighbourhoods' concept which is used to plan for towns and cities where people can access their essential daily needs within a walkable / wheelable distance from their home. Achieving complete, compact and connected places brings together a wide range of policies for sustainable development that align with its Best City Ambition, promoting zero carbon by reducing the need for people to drive to services, improving health and wellbeing by enabling opportunities for active travel and providing places for recreation close to where people live, and supporting inclusive growth by seeking to enable all people to have good access to services and facilities. The Council's work mapping complete, compact and connected places shows that currently over 80% of people in the district live in places where the services people require to meet many of their daily needs are within a short distance of their home.



- 116. It is proposed that the new LLP will set a policy framework that aims to support complete, compact and connected places through;
 - a) the overall spatial strategy of the plan, which as proposed (as outlined above), would focus growth within many parts of the district that already function as complete, compact and connect places, such as the City Centre and within existing urban areas (in good public transport corridors and around town and local centres).
 - b) taking into account the extent of services and facilities within a settlement when defining the settlement network for the district (see further details above)
 - c) seeking to ensure effective use of land, and increasing the density of development in the most sustainable locations (see Objective 24 below).
 - d) embedding CCC considerations into the site assessment methodology, enabling it to be understood how each site performs against CCC.
 - e) identifying through the site requirements for individual sites (or broad locations in opportunity areas) any specific requirements for new / enhanced services or connections that would be needed as part of a development in order to improve the extent to which the development is complete, compact and connected.

Objective 22. Ensure that development is located and designed to offer people a genuine opportunity to participate in sustainable and active modes of transport

- 117. The Connecting Leeds Strategy outlines a vision for Leeds to be a city where you don't need a car, and where everyone has an affordable zero carbon choice in how they travel. The 2024 Travel to Work Survey conducted by Connecting Leeds shows that 32% of all work journeys took place using sustainable transport modes (walking, cycling, bus and rail), with 25% involving no travel through working from home. Whilst the planning system is not able to control how people travel around the district, the LLP will have an important role in directing development to be located in places where there are opportunities to travel by sustainable or active modes, and designing developments so as to encourage and promote this.
- 118. In relation to the location of development, as with the CCC objective outlined above, it is proposed that Plan will seek to direct development to locations with sustainable transport opportunities through the overall strategy of the Plan (including through the identification of specific 'opportunity areas' aligned with the proposed Mass Transit network), increasing the density of development in locations well served by sustainable development, embedding assessment of the accessibility of a site by sustainable transport into the site assessment methodology, and identifying through site requirements any specific measures that developments will be expected to incorporate to ensure that they offer opportunities to travel by sustainable and active modes and potential, particularly on larger sites to design in mobility hubs (a recognisable place which brings together different modes of sustainable transport (walking, cycling, public transport, car share etc) alongside other facilities (bike repair station, beverage stands, parcel collection stations) and information to both attract and benefit the user.
- 119. In addition, views will also be sought on whether the Council should:

⁶ Work is underway to update the baseline evidence and update the CCC Heat Map.

- a) set minimum accessibility standards for new developments
- b) seek developer contributions towards improvements to sustainable transport infrastructure (i.e. enhancing bus services)
- c) require development to promote accessibility to public transport networks, including making provision for public transport services to be re-routed through a scheme where possible.
- d) require all new development to promote active travel by prioritising walking, wheeling and cycling within their schemes. This could be achieved through public realm enhancements, linking the site to the active travel network, creating a permeable walking environment, and providing facilities for people who wish to travel to work actively (i.e. showers, bike stores etc). Other potential opportunities including encouraging development to design out individual drives and garages, and to use centralised parking areas or parking barns as well as dissuading motorists from parking on footways and cycleways.
- e) embed a sustainable parking hierarchy within the Plan (i.e. disabled parking, car club parking, motorcycle parking etc) and consider options (alongside Design Codes) to develop more local parking standards
- f) support 'low-car' (or car-free) in the most accessible locations that are (or are planned to be) well connected by public transport.

Objective 23. Make use of all suitably located, available and deliverable previously developed and underutilised sites.

- 120. Over the last 15 years, 80% of new homes in Leeds have been delivered on previously developed ('brownfield') land (PDL). Making the most efficient use of this land can deliver multiple benefits, improving the visual appearance of vacant, derelict or run-down sites, addressing historic contamination issues, and limiting the need to build on greenfield land. There is strong public support for the making the most of brownfield opportunities, whilst avoiding flood risk areas, and it is also a priority in national planning policy.
- 121. To ensure that the LLP makes best use of brownfield land opportunities, an Urban Capacity Study (UCS) has been prepared which has proactively sought to identify potential sites on vacant or underused land in the urban area that have not already been brought to the attention of the planning department (i.e. as they have planning permission, are allocated in the SAP/AVLAAP or submitted for consideration through the Call for Sites). The purpose of this study is to identify additional brownfield sites that *may* have potential for development, and so merits further site assessment (considering both their suitability and deliverability) as part of the Local Plan preparation process.
- 122. In total, circa100 potential sites have been identified through the UCS, though it is important to note that many of these sites are relatively small scale, and not all of these are likely to be suitable, available or deliverable as allocations.
- 123. More broadly, it is clear from the UCS and site assessment process that there are insufficient supplies of PDL across the district to cater for the total amount of development needed over the plan period. The availability of PDL is also not evenly distributed across the district (with the majority being focussed in and around the City Centre) which also limits the extent to which it, alone, would be able to meet specific needs, including the housing requirements of local areas and the needs of specific business sectors. Nonetheless, it is proposed that making best use of all suitably located, available and deliverable PDL sites must be a key objective of the Plan.

- 124. It is proposed that new LLP will create a framework for supporting the delivery of PDL through:
 - a) the overall strategy of the Plan, which (as outlined above) is proposed would focus growth on key locations such as the expanded City Centre and Mass Transit growth corridors, where the investment and change proposed may be likely to prompt land value uplifts and create opportunities for the reuse of land;
 - b) embedding consideration of the existing status of a site into the site assessment methodology and giving positive scores to those sites that are PDL.

Objective 24. Secure an uplift in the density of development in and around the City Centre, town and local centres, and places that are well served by public transport.

- 125. The City Centre, along with the town and local centres across the district, have a really important role as hubs for shops and services giving residents opportunities to walk or wheel to meet many of their day-to-day needs. Similarly, places that are well served by public transport offer residents more options to travel by sustainable modes. Increasing the density of development in these locations will enable more people to benefit from these connections, help to support the ongoing vitality and viability of shops and facilities within centres, and also reduce the need for development to take place on land that can be used for other important purposes (such as food growing and renewable energy generation). Reducing the need to travel with also help to reduce carbon emissions which are associated with transport.
- 126. It is proposed that views will be sought on whether the Council should:
 - a) Review current policy which sets minimum requirements for the density of development across the district, and whether this should continue to be focussed on housing or introduce minimum density to other land uses (such as mixed use development, or business uses)
 - b) Introduce a new tier to require a minimum density of circa 75dph around town centres and transport interchanges (including train and bus stations and, in future, mass transit stations, outside of the City Centre). It is important to note that higher densities in such locations must be appropriate to local character and that emerging Design Code(s) can provide further guidance (see also objective on placemaking and design)
 - c) increase the minimum density requirement for development in the City Centre to 100dph, reflecting that monitoring shows that the average density of development that has been achieved in the City Centre in recent years significantly exceeds the current 65dph minimum requirement.
 - d) maintain the existing 40dph requirement for other urban areas, and 30dph requirement for smaller settlements but ensure that developments achieve this, particularly through an appropriate mix of house types and sizes.

Objective 25. Increase the re-use of buildings and their construction materials

127. The Plan has a role to play in encouraging more prudent use of existing resources e.g. by making homes and businesses more efficient in their use of materials and their operation and encouraging the re-use of buildings rather than demolition. This is to promote retention of materials in use at their highest value for as long as possible and then reused or recycled, leaving a minimum of residual waste, also known as 'The Circular Economy'. This objective was part of the LPU1 and consultees were very supportive of its approach.

Objective 26. Increase the amount of green and blue infrastructure across the district

- 128. The covid19 pandemic brought the importance of having accessible areas of nature and open recreation spaces close to people and the role they play in our physical and mental wellbeing clearly into focus. Such areas also help to counteract some of the environmental impacts of the way we live, including climate change and increases in carbon. It is therefore important that existing areas, sites and linking corridors of green and blue infrastructure are protected and enhanced, and new sites are created to increase the extent and quality of the network for the benefit of nature and people.
- 129. In line with the approach that was previously being advanced through LPU1, it is proposed that the LLP should;
 - a) identify existing land that forms part of the network of green and blue infrastructure
 - b) provide protection for existing GBI, and seek improvements, enhancements and extensions to it through the identification and protection of additional land
 - c) protect existing trees, woodlands and hedgerows across the district, and encouraging the planting of additional features, and require that suitable replacements are provided where the removal of trees is demonstrated to be necessary.
 - d) require residential developments to provide new green space and blue space on-site based on the number and size of dwellings provided, or (where this is not appropriate on-site) provide contributions that enable the equivalent new or enhanced space to be delivered off-site
 - e) ensure that new green and blue space is of a high quality, and that there are on-going arrangements for their maintenance.
 - f) protect existing green and blue space from development, unless there is an adequate supply of such space in the local area, the space is replaced by an area of at least equal size, accessible and quality, or the proposals will be delivering wider planning benefits and demonstrate improvements to existing greenspace in the same locality.
- 130. It is proposed that the Plan will also make consideration of where there may be opportunities for the development of site(s) within an area to take a joined-up approach towards the provision of new green and blue infrastructure, such as through the creation of centralised areas of new green space (such as is occurring with the creation of the new City Park) or connected corridors of green and blue features.

Objective 27. Ensure that development delivers at least a 10% net gain for biodiversity within the district

- 131. National planning policy recognises the importance of protecting and enhancing (in terms of quantity and quality) the natural environment and minimising impacts on, and providing net gains for, biodiversity to ensure habitats are left in a measurable better state than they were before development. This directly links to the mandatory requirement for at least 10% biodiversity net gain set out in the Environment Act 2021. The biodiversity and network of habitats within Leeds must therefore be protected, enhanced and expanded to ensure the benefits these bring to specific localities, habitats and species as well as to the city as a whole, continue and increase.
- 132. In line with the approach that was previously being advanced through LPU1, it is proposed that the LLP should;

- a) provide a locally specific policy that sets a framework for ensuring that development across the district delivers a minimum 10% net gain for biodiversity,
- b) embed considerations relating to the biodiversity value into the site assessment methodology
- c) require that off-site biodiversity gains be delivered within the District to ensure that nature recovery happens in the same place it is lost

Objective 28. Minimise the use of carbon through the design of new development including through assessing its whole life cycle carbon emissions and adopting sustainable construction standards so as to deliver zero carbon ready buildings that do not need to be retrofitted in the future

- 133. LPU1 sets a range of proposed policies around carbon reduction through buildings. These included: requiring all new development to calculate their whole life cycle carbon emissions, so as to encourage more consideration at the planning stage as to how to reduce carbon through the re-use of buildings and the construction of new buildings, minimising the use of carbon through the design of new development so as to deliver net zero buildings assessed through an Energy Use Intensity target so that it would not need to be retrofitted in the future and encouraging the adoption of sustainable construction standards that cover heat, power, water use and design for all new developments. The introduction of a Written Ministerial Statement in December 2023 promoted a need to reconsider this approach and avoid the policy being unsound because it would not accord with national guidance.
- 134. The Council remains committed to reducing the impacts of new buildings on its carbon budget and working within the new national context of a Future Homes Standard⁷, the WMS and any updates to national guidance will through the LLP devise new policies to encourage new buildings to be as Net Zero as they can be. In so doing it is acknowledged that developers raised concerns around the viability of zero carbon homes, their feasibility and the implications of this agenda on wider planning benefits. Whilst at the same time residents and groups expressed support for the policies, the need to tackle the climate emergency and the benefits that Net Zero Homes bring to energy security and affordability.

Objective 29. To encourage Heat Networks that take advantage of low carbon heat generated in the District and direct it to new development

- 135. Leeds City Council and its partners Vital Energi are constructing a heat network, via underground pipes, around Leeds City Centre which re-uses the heat produced from the Recycling and Energy Recovery Facility to supply a low carbon form of heat in the urban area to local homes and businesses. The network already has several connections, and the LLP will require new development to connect when appropriate.
- 136. Over the plan period it is envisaged that the heat network will grow. The Government is developing policies to designate *heat network zones* where heat networks are the lowest cost, low carbon solution for decarbonising heating for an area. The LLP will set policies to guide the growth of the heat networks outwards from the city centre and identify ways of locating specific types of development, such as data centres that assist in heat network zone heat loads.

⁷ Due to be published by end 2025 and currently still providing little clarity on key elements such as whether new homes should be built with gas boilers or not

Objective 30. Ensure that new developments are located and designed to reduce and mitigate flood risk taking into account the impacts of climate change

- 137. This objective was dealt with through the LPU1 and the approach that was consulted on and amended as a result of consultation will be progressed.
- 138. Winters have got 12% wetter in the UK over the last 60 years and the MET Office forecasts that rainfall is likely to rise by a further 20% by 2070. Some areas of Leeds are already prone to very high flood risk. On Boxing Day 2015, both the River Wharfe and the Aire reached their highest ever recorded levels in Leeds.
- 139. There are options around where the Council steers development and balance living close to the services and facilities people need, whilst avoiding development in high flood risk areas. If policy tests are made tighter to reduce new development in flood risk areas, this could result in people living further away from the towns and city centre, leading to longer journeys and more greenhouse gases and other pollutants.
- 140. The Council also wants to safeguard space for flood water during times of flood. By allowing some areas, known as functional floodplain, to flood, we can ensure better protection for our homes and businesses. When development can't be avoided in flood risk areas, the Council need to be sure that it's resilient and has safe access and evacuation routes and doesn't make flood risk worse elsewhere.
- 141. Climate change can lead to flash flooding when drains become overloaded. The Council wants to encourage better management of surface water including through more use of sustainable drainage systems which are designed to soak up surface water in a more sustainable way.

Objective 31. Strengthen the role of Leeds city centre and local centres

- 142. National Planning policy is supportive of the role that centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. There is a need to update some of the local policies which guide this development to ensure consistency with national policies to allow our centres to prosper in the future and continue to play important roles for our communities.
- 143. Leeds City Centre plays an important role spatially and economically not only for Leeds but also regionally. Town and local Centres within the district also play a significant role within their local communities and this has become more evident since the pandemic, as the way we shop, live and work has shown shifts. The hierarch of centres in Leeds defines a network of centres and has been instrumental in supporting their importance. Local planning policy to support these roles has had a positive impact on economic, social and spatial vitality.
- 144. As part of an evidence base for centres these were surveyed to provide a better understanding of centre health. An analysis of overall health of centres was carried out. This examined several criteria to include environmental quality, accessibility, landmarks, anchors, vacancy and a rating for each centre. This provides an evidence base for planning policy on a consistent basis, which can then be built upon to monitor trends. The evidence shows that Leeds town and local centres play a very important role to local communities providing not only a basis for retail, but a focus for community activity and a spatial focus for local people and businesses, regeneration and other initiatives. Within the context of national trends such as online shopping, the wider role which local centres play environmentally, socially and physically for connectivity has become more important and pivotal to what creates a successful local community.
- 145. The CCC analysis shows that town and local centres are some of the most sustainable locations in the District. National guidance, Permitted Development Rights and the Use Classes Order encourages housing in such locations. In Leeds' experience housing and town

centre uses work well together, because new population in centres provides spending power and assists with vitality and viability. However, the Council considers that housing should not have negative impacts on the key retail and commercial function of centres. Significant housing delivery can be delivered suitably and sustainably alongside centre uses. This has happened in the City Centre and has helped improve its vitality and viability particularly where ground floor active non-residential uses are retained or introduced. The new LLP will ensure that housing uses are supported as a means of providing activity in centres.

- 146. The Leeds City Centre boundary was defined through the UDP in 2001. The City has changed significantly since this time and the current boundary has been instrumental in shaping that. In reviewing the boundary consideration will need to be given to updating it to reflect current and future development needs and to create a city centre which is fit for the future. As part of this there will be a need to consider what the purpose of the boundary is in planning terms and how this could be best reflected over the next plan period. Some of the key drivers that influence this boundary change include:
 - a) the expanded City Centre arising from the Council's City Centre Vision partnership with Government around transformational growth and the creation of 6 new neighbourhoods around the City Centre core,
 - b) the growth in population of the City Centre and the need to provide sustainable urban neighbourhoods with the right mix of infrastructure for a variety of demographic groups
 - c) the changing nature of retail and the role of the primary shopping quarter,
 - d) the role of the City Centre as a focus for commercial activity and the changing patterns of development
 - e) the Council's complete, compact and connected analysis that reveals a paucity of local services in some parts of the City Centre fringe
 - f) design and heritage character analysis of the City Centre and the appropriateness of increased density, scale and massing across the City Centre e.g. through the location of tall buildings

Objective 32. Identify opportunities for renewable energy generation, storage and distribution

- 147. Leeds has the potential to generate renewable energy from a number of sources, such as anaerobic digestion, biomass, heat pumps, hydro, onshore wind and solar. To help ensure the UK has a secure energy supply, reduce carbon emissions from the generation of energy and promote investment in new green jobs and the industry, it is important to support the delivery of new renewable and low carbon energy infrastructure by supporting development in the most appropriate locations.
- 148. The Council has identified the potential to generate a total of 2,290 MW of renewable energy through solar and wind power across the district: 90 MW of wind and 2,200 MW of solar along with evidence that clarifies the locations best suited to these developments i.e. that avoid key environmental and physical constraints.

Objective 33. Promote and protect valued culture, leisure and tourism related development across the district to support a vibrant and sustainable visitor economy and improve health and wellbeing for residents

149. Leeds attracts many visitors and subsequent spending, with 15m domestic day trips with £823m spending and 2m overnight stays with £489m spending each year between 2021-2023,

being the 4th most visited city in England for domestic day trips and 5th for overnight trips. The visitor economy is therefore an important sector in Leeds and uses supporting this shall be promoted and protected by adding to the leisure and cultural offer of the District, and which in turn will also promote health and wellbeing for residents in Leeds.

- 150. The LLP will consult on approaches to this objective including: whether the right approach to the location of leisure and tourism activities is in place and whether the Council's approach to hotels and facilities outside the City Centre is sufficiently pro-active to support the visitor economy. this can include consideration of policies linked to the countryside around the rural tourism and the role of the District's waterways in promoting visitors.
- 151. Short-term lets are now a significant part of the UK's visitor economy, and can provide increased choice and flexibility for tourists and business travellers. However, in some areas can prevent local people from accessing housing in the local market and in some case leads to a rise in anti-social behaviour and impacts on local amenity. The LLP will consult on measures aimed at controlling short term lets that strike a balance between community needs and accommodation throughout the District that boosts the visitor economy.

Objective 34. No development will impose unacceptable effects on the health, amenity or natural environment of the surrounding area, taking into account existing sources of air pollution in the vicinity.

- 152. Air pollution can cause respiratory and cardiovascular diseases, which are major contributors to local mortality rates. Building sustainable developments and communities relies on safe levels of particulate matter pollution. The most vulnerable people and communities children, women and the elderly are usually those who suffer the most from air pollution, so policies and actions to improve air quality can also contribute to reducing inequalities.
- 153. The impact of development upon the amenity of residents is one of the main issues to be assessed in the determination of planning applications. This can cover visual amenity and residential amenity impacts of development. Visual amenity impacts includes its design, scale and massing in terms of the character of the surrounding area and use of materials. Residential amenity impact relates to the effects upon a neighbour's outlook, privacy, sunlight/daylight and any noise and disruption likely to arise directly or indirectly as a result of the development. This may include smells, fumes and other harmful effects from surrounding land uses. The LLP will set out an updated policy to control these.

Objective 35. Protect and enhance areas of landscape importance

154. The current Plan identifies areas of Special landscape Areas which are areas with high landscape value. The identification of these area was supported by the Leeds Landscape Asseesment 1994. At this stage it is not proposed to review the findings of that assessment. Whilst there will have been some localised incremental changes to landscape in Leeds, overall the landscape remains static and unchanged at a strategic level. Through the preparation of the new LLP there may be a need to undertake focussed landscape assessment in certain areas, for example for proposed areas or corridors of growth. Where land is promoted for potential development, developers will be expected to provide evidence to justify and mitigate any landscape impacts.

LLP - Approach to site assessment

- 155. The needs for housing, affordable housing, specialist housing, office, industry, logistics and other commercial development set out in the objectives above will be met through delivery of parcels of land across the District. The Council has choices to make on which sites to allocate based on suitability, deliverability, sustainability and potential to deliver plan objectives.
- 156. These choices will be influenced by site assessments of all proposed sites on a consistent basis across the District. This approach was outlined to Members at the meeting in July 2024 and in sum involves assessment of sites against a set of indicators as shown below:

Relationship to settlements	Biodiversity & geodiversity	Flood Risk
Heritage	Woodland and trees	Green belt
Greenfield or brownfield land	Accessibility	Landscape character
Air quality	Agricultural land value	Compatibility with neighbouring uses
Contaminated land	Minerals resources	Renewable and low carbon energy
Green space	Non-road transport network	Land instability
Town centre vitality & viability	Community facilities	Waste processing facilities

157. Each of these indicators is scored from +3 to -3 depending on the likely impacts development would have on it. A sites overall score is then categorised as follows:

Colour Code	Score	Notes
Green	0 and above Sites with at least 10% in open land or Green Belt would be in yellow	Sites that are generally sustainable with limited negative impacts
Yellow	-1 to –9 or scores 0 or above and lies within Green Belt or Open Land within Built Environment designations.	Sites that could be sustainable if some negative impacts are mitigated or addressed
Amber	-10 to -20	Sites that could be sustainable if many negative impacts are mitigated or addressed
Red	At least 10% of area within: functional floodplain, SSSI or ancient woodland	Sites that could only be sustainable if impacts on key indicators are avoided

158. The scoring of sites will be a key part of the consultation on LLP. From a residents perspective it will give an opportunity to consider the relative sustainability of the choice of sites available to meet local needs locally. From a landowners / developers perspective it gives an opportunity to allow for negative impacts to be addressed and mitigated either through avoidance, amendment, mitigation or seeking greater positive scores on other indicators. For example, whilst a site may score negatively for impact on greenfield land and landscape character it may score positively if it secures benefits to heritage assets, improve accessibility or provides community facilities.

LLP - Approach to consultation

- 159. The overall approach for the consultation is to follow the guiding principles set out in the Statement of Community Involvement (SCI):
 - **Trust** A commitment to partnership working and honesty about what can and cannot be influenced and achieved.
 - **Timely** Consultation will be at a formative stage to give people maximum opportunity to influence outcomes, and an adequate amount of time will be allocated for the consultation period.

- **Visible** The aims and purpose of the consultation will be clear and consultation activity will be promoted widely, as well as targeted to specific communities where necessary.
- **Inclusive** The consultation will be accessible and engaging and there will be a commitment to eliminating discrimination and advancing equal opportunities.
- **Transparent** The consultation findings, feedback and outcomes, as well as how the consultation has influenced decisions, will be easily accessible.
- 160. The Council will also focus on the three targets set out in the SCI:
 - **Target 1** To receive responses from every Ward on district-wide plan-making consultations.
 - **Target 2** To receive positive feedback on consultations that we undertake on planmaking.
 - **Target 3** There will be a year-on-year increase in consultation and engagement by young people (under 25's) between 2022 and 2027.
- 161. In addition to these targets, the Council will be responsive to specific needs as they arise during the consultation. It is proposed that the consultation period will extend up to 12 weeks (above the statutory 4 week period), commencing at the end of June 2025.
- 162. Drop-in events will be held in each community committee area. Dedicated webpages will be created, and the online community engagement platform 'Commonplace' will be utilised to encourage public participation. The online platform will present consultation materials in a more digestible format, allowing residents to access essential information and explore varying levels of detail based on their interests. A series of targeted events will be organised to ensure the consultation is open, easy, and inclusive. Additionally, a 'how-to' video will accompany the consultation to facilitate participation for all.
- 163. A 'local engagement profile' will be prepared for each community committee area to help ensure the consultation is responsive to different needs and circumstances across the district. Social media and other more traditional methods will be used to publicise the consultation. Paper copies of the consultation will be available in Community hubs, libraries and other selected places as requested.
- 164. The consultation material will start by asking respondents whether they agree with the Local Plan vision or not and then move on to topic-specific matters, including an assessment of the issues and key evidence to support an emerging approach (where there is one). An interactive map will provide details of sites submitted via the Call for Sites. This will include an initial assessment of development suitability and scoring.
- 165. In broad terms the consultation will focus on the following:
 - a) What do you think of the Leeds Local Plan Vision?
 - b) How should Leeds grow? We will ask for views about the options for distributing growth across the district. This will include an initial assessment of sites.
 - c) What policies should the plan include? We will invite views on a wide range of issues, including housing, greenspace, design and much more.
 - d) What are your priorities for the future of Leeds? We want to ensure the Local Plan reflects as the issues of interest and concern of all residents across the Leeds district.

What impact will this proposal have?

- 166. Once adopted, the LLP will guide development decisions through the determination of planning applications and also set a framework within which Neighbourhood Plans may be developed and updated. It will provide clarity for local people and investors on how Leeds is proposed to change up to 2042 and defend against inappropriate speculative development that is not supported in the Plan. It is important to ensure that local communities, and the development industry, are engaged in the process of preparing the Plan and that the Plan is underpinned by robust evidence.
- 167. This report provides an outline of the objectives that will be consulted on in Summer 2025.

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

 \boxtimes Health and Wellbeing \boxtimes Inclusive Growth \boxtimes Zero Carbon

- 168. There is a clear cross-cutting role for planning in delivering against all of the Council's pillars as established through the Best City Ambition.
- 169. **Zero Carbon** the existing spatial strategy for Leeds is based on the principles of reducing the need to travel (and enabling opportunities for the use of sustainable modes of transport) and maximising brownfield land and these principles will be reinforced and updated through the LLP including by supporting the development of low-carbon transport networks, addressing the challenges of housing quality, and creating vibrant places where residents have close access to services and amenities. LLP will also contain policies aimed at reducing the carbon impacts of new development. It will also promote the sustainable 'circular' use of resources, and the sustainable movement of materials. Moreover, the plan will improve Green and Blue Infrastructure within the District and its multi-functional benefits to climate mitigation and adaptation alongside supporting nature recovery so that the biodiversity of the District is more resilient to a change climate.
- 170. **Health and Wellbeing** using planning policies to enable better and more equal access to essential health and learning services by directing development to locations where housing, jobs, services and facilities are most accessible by active travel (including by walking and cycling). Through the LLP new high quality housing will be planned so that everyone can have a home that support good health, wellbeing and educational outcomes. It will consider connections between developments and green spaces, and secure the delivery of new or enhanced green space as part of housing development, recognising it's importance in supporting active lifestyles and mental health. The Plan will also have an important role in ensuring waste is appropriately managed to support health and wellbeing for all parts of the City;
- 171. **Inclusive Growth** updating planning policies for to support Leeds as an outward looking global city where the benefits of housing (especially affordable housing) and economic growth are distributed fairly and there are opportunities for all. The LLP2040 will support the role of the centres across Leeds, and ensure that sufficient land for industry and offices and minerals are available to support the growth of the City so as to maximise the potential to deliver a wide range of jobs across that are accessible and available to all. It will also recognise the importance of place and that positive identity culture, heritage and pride in our communities are vital assets which need to be protected and enhanced through new developments.

Wards affected:			
Have ward members been consulted?	⊠ Yes	□ No	

- 172. As outlined above, the plan-making process embeds consultation and engagement at each key stage. Consultation on the scope of the Plan was undertaken between February and March 2023, and it is intended that further public consultation is taken on the issues and options for the Plan in Spring 2025. Consultation on those objectives that previously formed part of LPU1 has been taken into account.
- 173. To raise awareness of the emerging Leeds Local Plan amongst all members and start a conversation with Members about change in their local areas in advance of public consultation in Summer 2025 a series of pre-consultation briefings have been arranged for all ward members throughout March. These outline the key drivers and strategic approach to managing development, the options for housing, the approach to the consideration of draft sites, and seek feedback on how this is best presented to local communities.

What are the resource implications?

- 174. The preparation of the Local Plan and accompanying evidence base is a resource intensive endeavour which incurs additional cost, in terms of both evidence base preparation and consultation, at a time of increased budget pressure. The Council's planning service has made organisational changes in support of greater data and intelligence emphasis at the earlier stages of plan making. These changes have taken some time to implement, but provide a strong basis for a) call for sites, b) site assessments, c) sustainability appraisal, d) complete, connected and compact analysis, e) green belt review and f) distribution scenarios all being undertaken in-house with an estimated combined saving to the Council of £500,000. In recognition of the important role that Data and Intelligence plays in plan preparation the Council secured £50,000 of Government funding to help prepare a Digital Planning Maturity Assessment, which will result in a digital action plan and opportunities to make further savings.
- 175. The merging of LPU1 and LLP will save the Council money in consultation and examination fees. In general, costs will be met from within existing budgets and consultation will be carried out in a manner which makes best use of low-cost technological options whilst ensuring that local people have an opportunity to engage with planners at face-to-face events. This recognises that, by working with communities, we may reduce delays (and costs) associated with objections and challenges to the Plan.
- 176. The Council has also been successful in bidding for £70,000 of Government funding to support the preparation of a Green Belt Review, following changes to national policy and guidance relating to the Green Belt and Grey Belt. Further opportunities for additional Government funding will be pursued if/when they are available.

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

- 177. It is recognised that there are risks to pursuing updates to the Local Plan. The planning system has been subject to considerable legislative and policy changes in recent years. Further reform is expected through the plan preparation period, including further revisions to national policy and guidance, and a new Planning and Infrastructure Bill.
- 178. The deadline to submit Local Plans under the current system is December 2026, which may prove challenging to meet given the complexity of the Leeds District and the wide variety of issues and significant number of sites that the Plan needs to consider. However, with Local

Plans continuing to be recognised as having a very important role in addressing the housing crisis it is necessary to progress the Plan rather than awaiting full details of proposed changes. Given the Plan remains at an early stage in the plan-making process there should be opportunities to adapt the Plan, as necessary, when further clarity emerges.

- 179. Development viability also presents a potential risk to the Local Plan. A key benefit of the merging of LPU and LLP2040 will be the ability to consider viability in the round, and balance potentially competing priorities for developer funding. To that end, it is also acknowledged that there is an increased imperative to look for creative solutions through the Local Plan in order to deliver its vision without introducing significant additional costs that render development unviable. Wider economic conditions will need to be kept under review as the Plan is developed, and reflected within viability evidence, in order to understand any implications that they have for development viability across Leeds.
- 180. The breadth of the scope of the Local Plan also presents a potential risk to timely progress, as a wide range of policy areas are proposed for inclusion as part of the new Plan. Whilst there are issues around the management of resources, there are also risks that a single issue may slow down progress on all issues, which will need to be managed.
- 181. Many of the topic areas identified in the proposed scope of the Local Plan have links with wider corporate risks identified in the Council's Corporate Risk Map and Annual Corporate Risk Report 2022. This includes the risks of insufficient housing growth, insufficient school places, climate change, community cohesion, escalating poverty, economic growth lag increasing inequality and transport issues: keeping the city moving. The Plan will have an important role in helping to manage some of these risks (including by ensuring sufficient land is available to support housing and economic growth, the provision of affordable housing to meet local needs, and considering the accessibility and transport implications of development proposals), and will also need to ensure it is responsive to the wider challenges facing Leeds.

What are the legal implications?

182. The preparation of the Leeds Local Plan as a development plan document is in compliance with the provisions of the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The Plan is a document which is part of the Budget and Policy Framework and which must be adopted by Full Council.

Options, timescales and measuring success

What other options were considered?

183. This report provides an update on progress with LLP objectives, some of these contains options within them which will be the subject of consultation.

How will success be measured?

- 184. Monitoring indicators for each new planning policy included in LLP will be developed as part of the policy development process. Success will be monitored as part of the Annual Monitoring Report.
- 185. Targets for consultation are established through the Statement of Consultation, such as receiving responses from every ward in Leeds, and these will be reflected and monitored as part of the LLP Report of Consultation.

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

- 186. With regards to the overall timescales for the Leeds Local Plan, there are a number of steps to producing or updating a Local Plan.
 - Scoping the previous stage where we sought views about what the plan will address and what it should aim to achieve (consultation Feb-March 2023)
 - Issues and Options where we carefully consider the comments made alongside evidence that we have developed, to identify the issues that the Plan needs to address and what the options for doing this are (the current stage June 2025).
 - Publication where, taking into account comments received, we draft detailed policies which specify what will be expected from developments (Summer 2026).
 - Submission where it is ensured that the final draft policies are considered sound and legal before submitting the Plan to the Secretary of State for independent examination by a Planning Inspector (December 2026).
 - Adoption where, following independent examination (and any proposed modifications), the Council receives an Inspector's Report and can formally adopt the policies as part of the statutory Local Plan (Mid 2027)

Appendices

• None

Background papers

• None