



Leeds Core Strategy Selective Review – Scope and Content

Leeds Local Plan

Development Plan Document

June 2017

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What is the Leeds Core Strategy?

The Leeds Core Strategy, adopted in November 2014, provides a positive and flexible overarching planning policy framework to guide development across Leeds for the period 2012 to 2028. The Core Strategy includes a wide range of policies on a number of strategic issues including housing, employment, retail, greenspace and green infrastructure, transport and infrastructure. It is required to be consistent with national planning policy – The National Planning Policy Framework (NPPF) and supporting National Planning Practice Guidance (PPG) and national legislation in the Planning and Compulsory Purchase Act 2004. Planning applications are determined in accordance with the Core Strategy, national guidance and legislation. The Core Strategy sits alongside a number of other Development Plan Documents; the Natural Resources and Waste Plan, the draft Aire Valley Leeds Area Action Plan and the draft Leeds Site Allocations Plan; to form the Local Plan for Leeds. Further details of these Plans are available in the [Leeds Local Development Scheme](#).

The Core Strategy is monitored annually in an [Authority Monitoring Report](#) which is available to view on the Council's web-site.

Why are we undertaking a selective review of the Core Strategy?

From the time the Core Strategy has been in operation; since its adoption November 2014; it has become apparent that a number of policy areas are in need of review because of new circumstances, evidence and/or the general effectiveness of policies. The proposed Core Strategy Selective Review seeks to address this. As the core strategy was recently adopted in November 2014, only limited selective alterations to the Plan are considered necessary at this point in time. The selective review will result in a series of focused amendments to the adopted core strategy. This approach is consistent with the NPPF, which states in paragraph 153 that *“each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances”*.

Scope of planning issues proposed to be addressed in the Selective Review of the Core Strategy

The following table sets out the proposed scope of planning policy issues that should be addressed by the selective review of the Core Strategy. Over the past months the Council has been considering the broad scope and content of the Review. This has now been agreed at the Council's Executive Board 8 February 2017. The table below provides an overview of the areas of the Core Strategy that it is proposed to review and the suggested approach that the Review will take.

The Leeds Core Strategy was adopted in November 2014 and forms the key strategic and spatial planning framework for Leeds. Central to this approach is the integration of a range of economic, environmental and social policy objectives.

Consistent with a plan-led planning system, is the need to monitor the effectiveness of the Plan and the evidence base upon which it has been derived. Within this context there are a number of specific matters which have arisen post Adoption, which fall within the scope of a proposed selective review of the Core Strategy.

1. Reviewing the **housing requirement**.
2. Extending the **plan period** to 2033, given that 5 years has elapsed into the Adopted Core Strategy plan period.
3. Incorporating new national policy regarding the Code for **Sustainable Homes** by updating the wording of Policies EN1 and EN2.
4. Reviewing **Affordable Housing Policy** in response to the Housing White Paper and changes in national legislation.
5. Reviewing the requirement **for Greenspace Policy** in new housing developments by amending Policy G4.
6. Incorporating **National Housing Space and Accessibility Standards** for new housing

The preparation of the Core Strategy Selective Review will be subject to Sustainability Appraisal (SA) including a revised SA Framework to more effectively assess the impact of proposed policies on social, economic and environmental sustainability objectives. The proposed revisions are set out in the SA Scoping Report which is being considered by Statutory Consultees during June/July so that the Core Strategy Selective Review policies when drafted in autumn 2017 can be subject to a more effective Sustainability Appraisal process.

www.leeds.gov.uk/csr

1. Housing Requirement				
Policy	Issue	Justification	Evidence	Alternatives
Spatial Policy 6	Reviewing the Housing Requirement	<p>The Leeds Core Strategy (CS) housing requirement of 74,000 (gross) and 70,000 (net) new homes between 2012 and 2028 was based on the Strategic Housing Market Assessment (SHMA) 2011. This used the 2008-based government projections of household and population growth alongside a re-balancing of the Leeds mid-year estimate population, which had significantly varied from other indicators. Subsequent household and population projections have suggested that the starting point for housing needs is now lower. Development Plan Panel (May 2015) agreed to, “support a selective review of the CS within 3 years of its Adoption and following subsequent household projections, which will better reflect demographic trends of a recovering economy”. These projections, the 2014-sub national household projections have been released and form the starting point for a re-consideration of the housing requirement.</p> <p>Any change to housing numbers would be reflected by the extension of the plan period</p>	<p>The new sub-national household projections released by Communities and Local Government (CLG) in June 2016 show a demographic “starting point” for Leeds of 2,600 homes required per annum between 2017 and 2033. The significant difference between this figure and the current Core Strategy requirement provides an evidential basis for a review of the housing requirement as part of a CS review. In line with Planning Practice Guidance this is being carried out via a Strategic Housing Market Assessment (SHMA).</p> <p>The CS evidence base used the 2008-based government projections of household and population growth alongside a re-balancing of the Leeds mid-year estimate population.</p> <p>The Council commissioned some initial analysis (by Edge Analytics) of the latest projections. This concludes that housing requirements could be within a range of 3,100 to 4,000 homes per annum.</p> <p>The Leeds Demographic Review September 2016 is a partial and preliminary assessment, of the latest household projections, when aligned with the latest economic projections. More detailed analysis is needed in a new SHMA.</p>	<p>The alternative to reviewing the housing requirement is to not review the housing requirement leaving it as it is currently in the Adopted CS. This is not considered to be a sound approach as it is not in line with national guidance that requires Local Plans to be based on up to date and adequate evidence. There are sustainability dis-benefits if the CS is delivering either too much or too little housing.</p> <p>There would also be an alternative to review the housing requirement at a later date as part of a more comprehensive CS Review. This would inevitably take longer to achieve and given the compelling evidence set out in the initial Edge Analytics Report it is considered that a speedier selective review is warranted.</p>

2. Plan Period				
Policy	Issue	Justification	Evidence	Alternatives
Extend the Plan period		There is a National Planning Policy expectation for plans to plan for housing delivery to a horizon of at least 15 years where possible (NPPF Paragraph 47). A revised plan period of 2017-2033 would align with this guidance.	The evidence base for an extended plan period is to align with the requirements of national guidance in the NPPF at paragraph 157 and the analysis undertaken in the revised SHMA.	The alternative to reviewing the Plan period is to not review the Plan period leaving it as it is currently. This reduces the time horizon of the strategic Core Strategy and could harm longer term investment and infrastructure decisions. The NPPF states in para 47 that local authorities should “identify a supply of specific, developable 12 sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. Therefore a revised 16 year plan period helps provide certainty for the identification of housing sites sufficient to meet local housing requirements.

3. Sustainable Homes Standards				
Policy	Issue	Justification	Evidence	Alternatives
Policy EN1/EN2	Sustainability	Updating the wording for Policies EN1 and EN2, to respond to the Government’s withdrawal of the Code for Sustainable Homes in March 2015, which is currently set out in the document “Implementation of Core Strategy Policies EN1 and EN2” on Leeds City Council’s website. Note that the renewable energy requirement of EN1 is not affected and remains applicable to relevant development and the BREEAM part of EN2 is not affected and also remains applicable to relevant development.	Written Ministerial Statement (WMS) 25 March 2015 sets out the government’s new approach to technical standards. Water consumption figures for Leeds. CO2 figures for Leeds and projections. Fuel poverty statistics.	<u>Water</u> Either apply the building regulations standard for water use or the higher optional building regulations standard for water use of 110 litres per person per day. <u>Energy</u> Either apply energy efficiency measures to current building regs standards or apply energy efficiency measures with a 20% uplift on current building regulation standards. For both water and energy it can be considered whether the policies should apply to all development or just major development.

4. Affordable Housing Policy				
Policy	Issue	Justification	Evidence	Alternatives
Policy H5	Affordable Housing	There is a need to update affordable housing policy to reflect national planning policy changes since the adoption of the Core Strategy. This includes the Housing White Paper (once outcome is known) which proposes to amend the National Planning Policy Framework to introduce a policy expectation that housing sites of 10 units or more deliver a minimum of 10% affordable home ownership products to include starter homes.	National Planning Policy to include The Housing White Paper. The Housing White Paper proposes changes to the definition of affordable housing to include starter homes as part of affordable home ownership products. This revised mechanism for the delivery of affordable housing will require an amended local policy framework. Update to SHMA (expected to be available late 2017). In addition viability testing will be required.	The progression of amendment of affordable housing policy can only be progressed once national policy has been changed. Once changes have been made to legislation then the option is to apply national legislation in the context of the SHMA and to viability test this as part of whole plan cumulative viability testing.

5. Greenspace				
Policy	Issue	Justification	Evidence	Alternatives
Policy G4	Greenspace	Reviewing the requirement for greenspace in new housing by amending policy G4 in the context of implementation of the policy. Also consideration of the cumulative impacts of the housing standards and any changes to affordable housing (as proposed below).	Analysis of greenspace agreed as part of a selection of planning permissions granted after adoption of the core strategy (Dec 2014). In addition viability testing will be required.	The alternative to reviewing policy G4 is to not review the policy, but to retain it as it is. However in the context of the housing standards and affordable housing (as proposed below), it is considered appropriate to review the policy.

6. Housing Standards				
Policy	Issue	Justification	Evidence	Alternatives
Proposed new policy	Housing Standards	<p>The Government created an approach for the setting of technical standards for new housing as set out in 'The Ministerial statement' (25th March 2015). Local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of an optional nationally described space standard and in relation to accessibility only.</p> <p>Nationally Described Space Standard. A single standard for minimum space requirements is set out by national guidance.</p> <p>Accessible Housing. In relation to accessible housing, national guidance states that if a LPA chooses to adopt standards in relation to accessible housing, then they can relate only to 2 categories, and a target percentage would need to be set for each category. These categories are as follows;</p> <p>M4(2) Category 2: Accessible and adaptable dwellings is an optional Building Regulation, and as such would only apply where planning policy allows and when conditioned on a planning application.</p> <p>M4(3) Category 3: Wheelchair user dwellings is an optional Building Regulation.</p>	<p>National Guidance states that LPA's will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in the Local Plan. LPAs should also consider the impact of using these standards as part of their Local Plan viability assessment.</p> <p>Nationally Described Space Standard Regarding need, an exercise to measure dwellings permitted and provides an evidence base for the standards. This exercise has been completed provides strong evidence that a policy to apply the NDSS is necessary.</p> <p>Accessible housing Need – evidence of need for accessible dwellings for both M4(2) and M4(3).</p> <p>In addition viability testing will be required.</p>	<p>The Housing Standards were originally proposed to be progressed as a Development Plan Document. This work will now be subsumed into the Selective Core Strategy Review. National guidance is clear that if the standards are to be adopted then this needs to be demonstrated by need and viability evidence to include appropriate timing and must be through the Local Plan process. The alternative to the introduction of the Housing Standards in the Core Strategy is introducing only one of the two standards (ie only space standards or only access standards) subject to need and viability testing, or to introduce neither.</p>

Evidence base documents are listed at [Appendix 1](#) and available to view on the web-site.

How to comment

Any comments in relation to the [Core Strategy Selective Review](#) should be sent by **5pm 31st July 2017** using the response form where possible and be submitted via:

Email: corestrategyreview@leeds.gov.uk, or by

Post: Core Strategy Selective Review, Policy and Plans, The Leonardo Building, 2 Rossington Street, Leeds, LS2 8HD
We would prefer not to receive paper and would also prefer to communicate via e-mail to save money.

The Council's proposals for the Core Strategy Selective Review and supporting documents including the Sustainability Appraisal are available for inspection at the Development Enquiry Centre, Leonardo Building, 2 Rossington Street, Leeds, LS2 8HD (Monday - Friday 8:30am - 5pm, Wednesday 10am - 5pm) and at libraries and one-stop centres within Leeds District.

Next Steps

Following Regulation 18 consultation, the Council will take into account consultation responses in drafting the revised policy areas set out above.

Regulation 19 Publication Draft will be available for comment and be accompanied by an evidence base and sustainability appraisal.

The Core Strategy is not a static document and whilst there may not be scope to revise all of the policies at this stage the Council is committed to keeping the document up to date. Your comments on the scope of the review should usefully refer to policy areas which the Council is omitting in this current selective review, when such a future review might be considered and what evidence would support this.