

Leeds Local Plan – Next Steps

Date: 27th January 2026

Report of: Chief Planning Officer

Report to: Development Plan Panel

Will the decision be open for call in? Yes No

Does the report contain confidential or exempt information? Yes No

Brief summary

The Council is preparing an updated Local Plan, which will outline what types of new sustainable development are expected across the District, where they will happen, and how they should look. This plan will help guide how the city grows and changes, helping to make decisions about land use, whilst balancing development with social and environmental needs. This plan-led approach is also integral to delivering the City Council's ambitions for inclusive growth, health and well-being, resilient places and thriving communities.

This report provides an update on the timetable of the Local Plan, considering changes to national plan-making legislation in the Levelling Up and Regeneration Act and accompanying regulations and guidance.

Recommendations

Development Plan Panel is requested to:

- a) Note and comment on the contents of this report.
- b) Endorse a revised timetable for Local Plan production set out in the document against the new plan-making regulations.

What is this report about?

1. This report seeks to provide Members of Development Plan Panel with an update on changes to the plan-making regulations and their implications for the Leeds Local Plan (LLP).

2. The English planning system is based on local plans, and the government aims for complete national coverage and swift adoption of plans to help deliver its 5 missions: (1) kickstart economic growth, (2) make Britain a clean energy superpower, (3) build an NHS fit for the future, (4) provide safer streets and (5) break down barriers to opportunity. It is envisaged that local plans will particularly aid in the mission to kickstart national economic growth and planned growth at the local level. To modernise the planning system for this task, the Government is taking forward the provisions within the Levelling Up and Regeneration Act (LURA) (2023) to introduce a quicker, clearer and more user-friendly plan-making process.
3. These reforms include:
 - standardised 30-month process for plan preparation and adoption;
 - gateway checks involving the Planning Inspectorate to provide early assessment and ensure compliance at key stages;
 - positive shaping of plans by community views before policies are fixed;
 - a digital-first approach focussing on creating accessible, map-based local plans using standardised data and more transparent so that communities can understand policies and engage more effectively;
 - abolition of the "Duty to Cooperate" to speed up the process, replaced by revised national policy and new Spatial Development Strategies;
 - a streamlined examination process; and
 - reduced evidential requirements through clearer guidance and increased data standardisation.
4. The existing and new systems will operate concurrently throughout this year, with submissions under the existing system only allowed until 31st December 2026. Up until this point the LLP has been progressing under the Town & Country Planning (England) Regulations 2012 (the 2012 Regulations), because the regulations for the new system are not yet in place. There are no transitional arrangements for plans like LLP beyond the cut-off date of December 2026.
5. A Written Ministerial Statement (WMS) 'Reforming Local Plan-Making' was published 27th November 2025. This confirms that new regulations, implementing the provisions of the LURA, will soon be laid before Parliament (estimated by end January 2026) (the 2026 Regulations). These will define the full process for producing the new-style plans and replace the existing regulations. At the same time as the WMS, the Government made available a draft of these new regulations.
6. The 2026 Regulations will work alongside a new National Planning Policy Framework (NPPF) which was launched for consultation in December 2025 (and is the subject of **Item 1** of this meeting).
7. The 2026 Regulations set 3 rounds of public consultation with the introduction of Planning Inspectorate endorsed gateway checks – to de-risk plans prior to submission. The diagram at **Appendix 1** illustrates the sequence of key local plan-making steps which will be required under Part 2 of the Planning and Compulsory Purchase Act 2004 ("PCPA 2004") (once amended by Schedule 7 to the LURA). In sum they include:
 - An initial scoping consultation – inviting feedback from the local community and stakeholders on how to engage with them and what the plan should include.
 - A proposed local plan content and evidence consultation – setting out proposed content and a draft vision.

- A proposed local plan consultation – setting the submission plan in draft.
 - Submission and examination – against new tests of soundness in the NPPF.
8. Under the 2012 Regulations, the LLP has held its early issues and options (Regulation 18) consultation between July and September 2025. Under the existing system, the next step would be a draft plan (Regulation 19) and then submission to the Secretary of State for independent examination. The issues and options consultation was delayed due to the publication of NPPF revisions in 2024 - where a revised Standard Methodology set new housing numbers for the Leeds District. The programme has been delayed by the publication of revised national guidance on how to carry out a Green Belt assessment, which was published too late to be incorporated into the issues and options consultation and remains the subject of in-progress evidence base work.
 9. The issues and options consultation set out the scope of the plan with alternative approaches for around 50 topic areas and an initial assessment of 550 sites for housing and employment. The consultation was successful in its reach with nearly 20,000 individuals making around 45,000 comments.

What impact will this proposal have?

10. There has been inclusive growth and sustained housing delivery in sustainable locations in Leeds over many decades (with over 80% of delivery in the past 15 years on brownfield land and development in highly accessible locations). The new LLP is a chance to continue this record, making the best use of brownfield opportunities through transformational regeneration, meeting a range of needs throughout the District, significantly increasing the delivery of affordable housing and setting place making standards for development to meet (including the right level of supporting infrastructure). The City Council wants the changes to the new Local Plan making system to help expedite these priorities and to help maximise the opportunities that new development brings for the city and its ambitions, rather than introducing unforeseen delays.
11. The planning reforms have been flagged as a risk to the timely progression of the LLP in each report to Development Plan Panel and Executive Board. It was always going to be a very challenging timetable for the plan to progress to submission by December 2026. The window of opportunity to submit a plan under the existing regulations has significantly narrowed considering the Government announcements and it is now apparent that achieving this deadline is highly unlikely for the following reasons:
 - the **scale of responses** to the Summer 2025 consultation is welcomed, but presents resource issues for the team (having taken just over 3 months to analyse and summarise);
 - the **scale of the plan has grown**, with over 150 additional site submissions, bringing the total number of sites to over 700 – the City Council will only seek to bring forward a small proportion of those through detailed site assessment and comparison (a task which has now increased by almost 25%);
 - a **wide range of evidence** base work that will support site allocations is programmed but not yet started, as it is dependant on analysis of the Regulation 18 consultation, which is nearing conclusion;
 - some evidence base work is underway, but not finished, and would require **additional public consultation** e.g. the Green Belt assessment and its implications and Gypsy and Traveller Accommodation Assessment; and
 - the draft **revisions to the NPPF** published for consultation in December 2025 are extensive and will require time to align with progressing policies – in some cases

because of new decision-making policies in the NPPF there may be no need for a local plan policy on a particular topic area.

12. If moving to a new system the Council would have to commence formal plan making i.e. Gateway 1 by October 2026.
13. Plan making is complicated, resource intensive and technical in nature and a large amount of work has already gone into the LLP. A significant amount of community time and effort has also been invested – in line with the positive shaping of plans by community that the Government envisages. The City Council is committed to making this count and to continuing the positive engagement. Therefore, it will be important to maintain the momentum with local communities in this regard that the City Council has already established, and not unduly confuse people with technical regulatory changes that make little difference to the Local Plan outcomes. To that end, the City Council is seeking to work closely with the Ministry of Housing, Communities and Local Government to ensure that a shift to new regulations does not significantly slow down the adoption of the Local Plan and that the work invested thus far is saved to avoid cost and wasted effort.
14. There are significant advantages in moving to the new plan-making system as follows:
 - the timetable will now have more flexibility in it to account for unforeseen circumstances, whereas under previous regulations there was a non-negotiable cut off;
 - gateway checks with the Planning Inspectorate help to de-risk and accelerate the examination process – whereas in past experience this can take up to a year to progress;
 - the new LLP would be prepared in line with the new NPPF providing certainty and clarity for investors and local people because new NPPF decision making policies can have precedence over local plan policies; and
 - the Government’s proposed New Towns Task Force would be able to confirm and clarify the role played by Leeds South Bank enabling a stronger reflection of it through the LLP.
15. A draft timetable under the 2026 Regulations, that also considers the work already carried out, is set out below:
 - a. **“Scoping consultation”** in Summer 2026
 - i. local people were informed in Summer 2025 that further consultation would be held in Summer 2026;
 - ii. an opportunity to present a report of the Summer 2025 consultation and clarify what “you told us”, which forms a key steer to the Council on plan making; and
 - iii. confirming any revisions to the scope of the plan (for example, because an issue that the plan was previously anticipated to cover is now addressed by national development management policies),
 - b. Consultation on **“Proposed Plan Content and Evidence”** in Autumn/Winter 2026
 - i. options for a range of sites that have been assessed as being clearly preferable or marginally preferable and enable local communities to express a preference and a choice between sites; and

- ii. full evidence base for thematic policies and proposed approaches with draft policy wording, alongside evidence underpinning site assessments, including work on the green belt.
- c. Consultation on “**Draft Local Plan**” in Summer 2027
 - i. the plan in final draft and in full with preferred policies and site allocations.
- d. **Submission** to Government in Autumn/Winter 2027

How does this proposal impact the Leeds Ambitions?

Healthy Growing Thriving Resilient

16. There is a clear cross-cutting role for planning in delivering against all the Leeds Ambitions.

Healthy – The plan will use planning policies to help improve health equity, create and develop healthy places and communities, and support ill-health prevention in line with the Marmot City approach. The plan will equalise access to essential health and education services by directing development to areas where housing, jobs, and services are easily reachable through walking and cycling. Additionally, the plan will play a key role in managing waste properly to enhance health and well-being throughout the city.

Growing – The plan will support Leeds as a globally connected city, ensuring that the benefits of housing (especially affordable housing) and economic growth are shared fairly, with opportunities for everyone. The LLP will strengthen the role of key areas across Leeds and make sure there is enough land for homes, industry, offices, and minerals to support the city’s growth, helping create a wide range of accessible jobs for all. It will also emphasise the importance of place, recognising that a strong sense of identity, culture, heritage, and community pride are valuable assets that must be protected and enhanced through new developments.

Thriving – The plan will support strong place-making that ensures communities benefit from new development and its associated transport, social, environmental and cultural infrastructure. It will improve connectivity and encourage active travel. The plan will ensure that new, high-quality housing is designed to promote good health, well-being, and educational success for everyone. It will also focus on creating strong connections between developments and green spaces, ensuring that new or improved green spaces are included in housing projects to support active lifestyles and mental health.

Resilient – The current spatial strategy for Leeds focuses on reducing the need for travel, encouraging the use of sustainable transport, and making the most of brownfield land. These principles will be strengthened and updated in the LLP. This includes supporting the development of low-carbon transport networks, improving housing quality, and creating vibrant areas where people can easily access services and amenities. The LLP will also include policies to reduce the carbon impact of new developments and promote the sustainable use of resources and materials including renewable energy. Additionally, the plan will enhance Green and Blue Infrastructure across the District, improving climate adaptation and mitigation while supporting nature recovery to help the local biodiversity cope with climate change.

What consultation and engagement has taken place?

Wards affected: ALL

Have ward members been consulted?

Yes

No

17. Consultation on the LLP has been on-going, however no consultation on the specific issues in this report have been held.

What are the resource implications?

18. There are no additional resourcing implications in pivoting to the new planning system. It is likely that if the plan was to progress under the current 2012 Regulations, there would be a need to pivot at a later date in any event. Therefore it is likely that, taking the decision now, will save resources in the longer-term.

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

19. Under the proposals in this paper there would remain risks to the preparation of the LLP. Chiefly, the planning system has been subject to considerable legislative and policy changes in recent years, which are ongoing. Whilst the substantial bulk of the planning reform is now known, further reform is expected through the plan preparation period, including further revisions to the infrastructure levy approach. Additionally, whilst the draft NPPF indicates a clear direction of travel for updated national policy, it may be subject to change as a result of the ongoing public consultation and at the present time no date has been given for the publication of the final NPPF. This may change the direction of some objectives and policy areas.
20. There is also the issue of a need for alignment with the emerging Spatial Development Strategy (SDS). The Combined Authority is responsible for the preparation of the SDS, but close and cooperative working will ensure full alignment and the NPPF has now been updated
21. There is a risk that delays to the Local Plan will increase speculative development and risk impacts on maintaining a health land supply. Whilst the new proposed timetable has a later submission date, because it will be prepared against the new planning system it will be a stronger material consideration and less likely to be deemed out of date and out of line with the provisions of the NPPF in due course.
22. 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. 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?

23. 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 currently the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

This report advocates moving to the Town and Country Planning (Local Planning) (England) Regulations 2026 (as amended). These are due to be laid before parliament by the end of January 2026. 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?

24. The Council has no choice but to prepare a plan in accordance with its statutory duties as the Local Planning Authority and in accordance with the relevant legislation, including undertaking a review of its existing Local Plan to see if it needs to be updated. Preparing an updated plan provides certainty for residents and investors in the District so the option to not update was not a reasonable option.
25. The option to continue the plan to submission in December 2026 is considered to be an unreasonable one given the reasons set out in paragraph 11 above. If the Council were to progress to submission under the current system, it would involve compromises to public consultation, evidence base and alignment with the NPPF which would limit the effectiveness of the LLP and likely lead to delays at the examination stage of the plan which would be harder to remedy.
26. The Government is not taking forward proposals that would have seen plan-making being rolled out in a series of 'waves'. This means that the scope of the LLP cannot be amended to ensure it is submitted by the end of December 2026.

How will success be measured?

27. Success will be measured by:

- progress of the LLP against the timetable set out in paragraph 15,
- continued engagement with local communities, stakeholders and the development industry to ensure that the plan secures the objectives of the City Council and national guidance in a manner that is clearly articulated and informed by consultees, and
- an independent Planning Inspector considering that the plan is sound following an examination in public.

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

28. The timetable for the revised LLP is set out at para 15 above. The Head of Strategic Planning and Group Manager for Policy & Plans will be responsible for the implementation of the LLP.

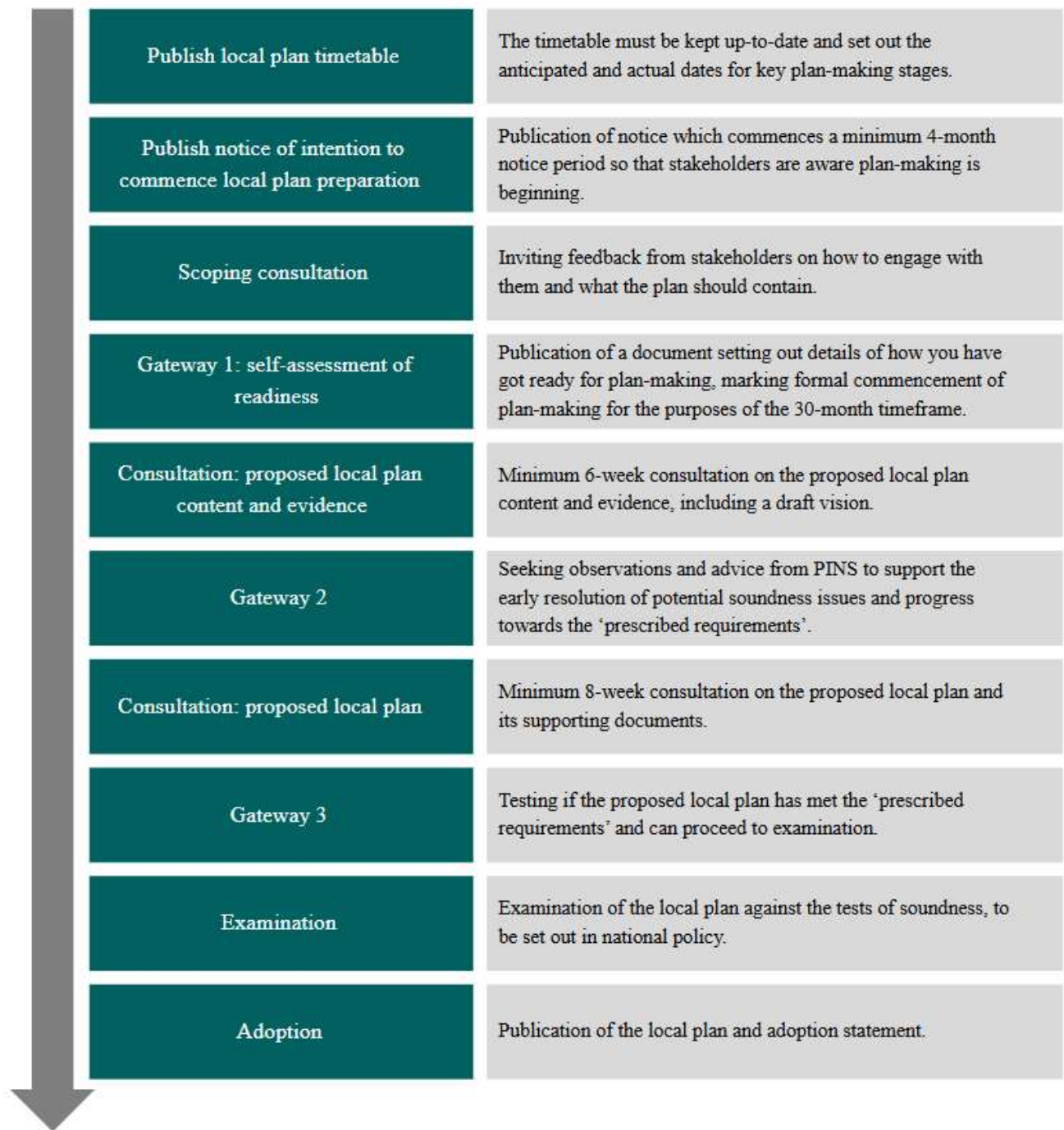
Appendices

- Appendix 1 – Local Plan Making Process under the revised regulations

Background papers

- n/a

Appendix 1 - Local Plan Making Process under the revised regulations



Source: <https://www.gov.uk/government/publications/plan-making-regulations-explainer/plan-making-regulations-explainer>