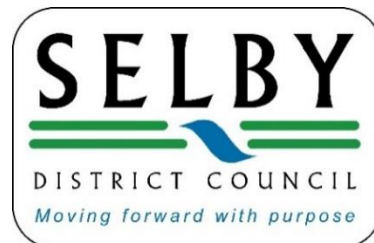


Leeds City Region Statement of Common Ground

March 2020



1.0 Introduction

- 1.1 The Leeds City Region partner councils have prepared this Statement of Common Ground in response to the requirement as set out in the revised [National Planning Policy Framework](#) (NPPF) published in February 2019.
- 1.2 The approach set out in this Statement of Common Ground is in accordance with the requirements within the Government's [Planning Practice Guidance](#).

2.0 Geographical Area

- 2.1 It has been jointly determined that this Statement of Common Ground will cover the geographical area as illustrated in Figure 1. The justification for the choice of this geography is a combination of:
 - The existence of governance frameworks including the Leeds City Region Local Enterprise Partnership (LEP), West Yorkshire Combined Authority and associated Panels.
 - Evidence to support this geography as a functioning economic area and existence of a comprehensive evidence base and a shared policy position on economic growth as set out in the [Strategic Economic Plan](#) (SEP).
 - The existence of well-established, common approaches and tools used by authority partners to address duty-to-cooperate requirements, (as set out in the Leeds City Region Statement of Cooperation for Local Planning (Revised 2018)).
- 2.2 The Partner Councils are 'parties' responsible for developing and maintaining the Statement of Common Ground and are listed below.

Parties

Barnsley Metropolitan Borough Council
City of Bradford Metropolitan District Council
The Borough Council of Calderdale
Craven District Council
Harrogate Borough Council
The Council of the Borough of Kirklees
Leeds City Council
Selby District Council
The Council of the City of Wakefield
City of York Council
West Yorkshire Combined Authority
North Yorkshire County Council

- 2.3 Also listed below are the Prescribed Bodies as identified in NPPF, these bodies (where relevant) will be notified of the publication of this Statement of Common Ground and invited to support its objectives.

Prescribed Bodies

- The Environment Agency
- The Historic Buildings and Monuments Commission for England (known as Historic England)
- Natural England
- The Mayor of London (not relevant in this region)
- The Civil Aviation Authority
- The Homes and Communities Agency
- Each clinical commissioning group established under section 14D of the National Health Service Act 2006
- The National Health Service Commissioning Board
- The Office of Rail Regulation
- Transport for London (not relevant in this region)
- Each Integrated Transport Authority
- Each highway authority within the meaning of section 1 of the Highways Act 1980 (including the Secretary of State, where the Secretary of State is the highways authority)
- The Marine Management Organisation

Figure 1 – Leeds City Region Statement of Common Ground Administrative Areas



3.0 Governance Process

- 3.1 This Statement of Common Ground will be approved and kept under review by the parties as listed in Section 2.2 of the Statement.
- 3.2 The West Yorkshire Combined Authority Place Panel provides oversight on joint-working on planning matters, all Leeds City Region partner councils are represented on this panel. The functions of the Place Panel include evidencing compliance with the statutory duty to cooperate in relation to planning of sustainable development.
- 3.3 The Leeds City Region Statement of Cooperation for Local Planning (March 2016) sets out the cooperation process in the Leeds City Region.

4.0 Monitoring and Review

- 4.1 This Statement of Common Ground will be kept under review and maintained to reflect the most up-to-date and readily available information. A review by the LPA's and the Prescribed Bodies to establish whether the document needs to be updated will be carried out annually.
- 4.2 When updating this Statement the adoption of neighbouring, or overlapping, statements of common ground covering other geographical areas will be reflected.

5.0 Leeds City Region Joint Working on Planning Matters

- 5.1 As a polycentric economic area there are centres of different economic strength including Barnsley, Bradford, Halifax, Harrogate, Huddersfield, Selby, Skipton, Wakefield and York which surround the economic core of Leeds.
- 5.2 Interdependencies and commuting movements are complex and have resulted in a strong history of collaboration on spatial planning issues across the Leeds City Region. The polycentricity of the sub region has driven patterns of growth and our collective approach to planning. Our approach is to prepare complementary local plans that collectively reflect a shared ambition for inclusive and sustainable growth.
- 5.3 An [interactive infrastructure map](#) has been prepared in partnership with all partner councils for the purposes of sharing spatial information on infrastructure and planned growth. The map provides a collective position on current (or emerging) local plan growth and spatial priority areas. It can also be used to identify / illustrate cross boundary matters and to consider infrastructure needs and inter-relationships between infrastructure types.
- 5.4 Collaboration on planning matters results in better planning outcomes and is undertaken between partner councils for a number of reasons, including:
 - The main functional trends and drivers for change that affect places operate at a spatial scale above local authority level. Housing markets, commercial

property markets, labour markets, business agglomeration effects and supply chains, travel to work areas, utilities networks and water catchments for example do not stop at local authority boundaries. In the context of the Duty to Cooperate, understanding these greater-than-local trends and engaging with partners to identify and resolve issues is essential.

- There is a collective interest across partner councils in the success of the most strategically important places of growth, regeneration and change, including growth corridors that will drive the city region's economy. Local policy development cannot be undertaken in isolation, partner councils within the Leeds City Region are actively engaged in identifying and promoting / delivering strategic priorities.
- Planning policy at a local authority level relies, to some extent, on an evidence base and technical work developed across local authority boundaries because the matters being considered have cross boundary implications. Examples of this include economic forecasts, population and household projections, analysis of opportunities and constraints relating to infrastructure, supply and demand for minerals and data analysis on waste arisings. All of these areas of policy will benefit from technical work based on a geography that is wider than the local authority level.

6.0 Planning for Housing in the Leeds City Region

- 6.1 The unique geography of the Leeds City Region determines that the partner councils have a close, but not dependent, relationship on each other for accommodating housing need.
- 6.2 The existing and emerging suite of Local Plans set out the approach to meeting local housing need. In development of these plans partner councils consider what the most sustainable local patterns of development are, undertaking local green belt reviews where necessary.
- 6.3 There are specific settlements and areas of open countryside where cross-boundary cooperation on the most effective and sustainable patterns of development are required. These areas are an ongoing focus for detailed Duty to Cooperate work on a bilateral basis between partner councils.
- 6.4 With regard to housing need all Leeds City Region Local Planning Authorities are planning for their own need within their own Local Authority boundaries. For the avoidance of doubt, based on current plan targets (some draft) there is no housing shortfall or distribution of unmet need required.
- 6.5 Cumulative housing targets for the Leeds City Region:
- 12,350 dpa (Local Plan targets at January 2020 – some draft)

Refer to Appendix 1 for full local authority breakdown of housing need figures and targets.

7.0 Matters on Which Parties Agree

- 7.1 The following have been identified as matters on which the parties agree relating to the strategic matters of Inclusive Growth, Housing, Green belt, Employment, Transport, Minerals and Waste, Climate Change, Environment, Health and Well-being, and Education.

Inclusive Growth

Parties agree to:

- 1) maintain progress on local plans in line with indicative timetables to ensure we are collectively and proactively planning for inclusive / sustainable growth.
- 2) consider local plan timescales in the context of emerging strategic priorities recognising the benefits of alignment for cross-boundary working.
- 3) maintain and strengthen the existing robust and proportionate evidence base to give a clear understanding of economic forecasts, housing needs, infrastructure capacity constraints and opportunities and environmental constraints and characteristics.
- 4) adopt common approaches to viability across the city region.
- 5) take account of the Leeds City Region and York, North Yorkshire and East Riding Strategic Economic Plans and the emerging Leeds City Region and York, North Yorkshire and East Riding Local Industrial Strategies and supporting Strategic Economic Frameworks in preparing local plans.
- 6) take account of economic forecasts from the Regional Econometric Model (REM) in undertaking modelling for local plans.
- 7) ensure that local plans drive transformation of economic, environmental and social conditions in the seven urban growth centres of Bradford, Halifax, Huddersfield, Leeds (including the South Bank), Wakefield, Barnsley and York, (as Spatial Priority Areas (SPAs) identified in the Leeds City Region SEP) including spreading the benefits of continued growth of the Leeds economy as the City Region's economic centre.

Housing

Parties agree to:

- 8) plan for between 10,000 and 13,000 additional homes per year in the Leeds City Region up until 2031 as stated in the Leeds City Region SEP.
- 9) include the calculation of housing need figures based upon the Government's finalised methodology for calculating local housing need¹, taking account of economic uplift / market conditions as necessary in preparation of local plans.
- 10) to plan for their own need within their own Local Authority boundaries taking account of housing market geographies as detailed in the shared evidence report '[Leeds City Region Housing Market Areas' \(CURDS July 2016\)](#), as updated by local strategic housing market assessments.
- 11) use the plan making system to maximise delivery of affordable housing.

¹ with the exception of local planning authorities who have submitted local plans for examination prior to 24th January 2019 (i.e. the revised NPPF transitional period).

- 12) explore the opportunity to improve the quality of new housing through development plan policy reflecting an ambition to drive consistent, high quality design standards across the Leeds City Region.
- 13) ensure that local plans drive housing delivery in the six housing growth areas of Bradford-Shipley Canal Road corridor, Castleford Growth Zone, East Leeds Extension, North Kirklees Growth Zone and Wakefield City Fields, plus York Central (as SPAs identified in the Leeds City Region SEP).
- 14) Ensure housing and employment growth are planned holistically in order to ensure sustainable patterns of development across the city region.

Green belt

Parties agree to:

- 15) undertake local reviews of green belt as required in preparing local plans where consideration of reasonable options for meeting development needs by other means has taken place.

Employment

Parties agree to:

- 16) plan for employment growth of 35,700 net additional jobs above baseline job growth projections to 2036 in the Leeds City Region as a shared ambition identified in the Leeds City Region SEP.
- 17) ensure that local plans drive employment growth in the 16 employment growth areas as identified in the Leeds City Region SEP. These include mixed use sites and the [Enterprise Zones](#) (EZs) of York, Leeds (Phase 1 Leeds City Region EZ) and the 10 sites across the five West Yorkshire districts which are located along key arterial routes of M1, M62 and M606 corridors (Phase 2 Leeds City Region EZ).

Transport

Parties agree to:

- 18) support the delivery of objectives and targets in the [Transport for the North Strategic Transport Plan](#) (2019), [West Yorkshire Transport Strategy 2040](#), [North Yorkshire Local Transport Plan \(2016-2045\)](#), [Leeds City Region HS2 Growth Strategy \(2018\)](#), [West Yorkshire Low Emissions Strategy \(2016 – 2021\)](#), [Sheffield City Region Transport Strategy 2040](#), emerging rail strategy and emerging Leeds City Region Connectivity Strategy.
- 19) support the safeguarding and delivery of critical strategic routes and collaborate across boundaries (including beyond the Leeds City Region) to make best use of inter-regional road, rail and water transport networks including for the purposes of freight movements and to enable use of the most sustainable modes.
- 20) plan for significant transport infrastructure in the Leeds City Region including planning for an integrated mass transit system for West Yorkshire.

- 21) align funding opportunities to deliver strategic growth objectives to ensure that development plans are deliverable; with a particular focus on SPAs as identified in the Leeds City Region SEP and where significant growth is identified in emerging local plans.
- 22) maintain support for strategic transport infrastructure that directly underpins housing and employment growth, particularly where this enables allocations to be fully developed contributing to the supply of new homes and/or jobs.

Minerals and Waste

Parties agree to:

- 23) sharing data / information both within and beyond the Leeds City Region on minerals and waste matters and to maintaining a shared, proportional evidence base including keeping up-to-date the West Yorkshire Waste Model (for relevant partner councils), undertaking regular waste capacity gap analysis and jointly preparing and aligning Local Aggregate Assessments (LAAs) on an annual basis.
- 24) review a joint position on safeguarding of wharves and rail sidings.
- 25) encourage the movement of Marine Aggregates into the Leeds City Region to help maintain an adequate supply and reduce pressure on sensitive land resources.

Climate Change

Parties agree to:

- 26) work towards contributing to the national target of being carbon neutral by 2050 alongside local targets and targets in national and local climate emergency declarations, and collaborating where appropriate to accelerate progress towards a carbon neutral city region.
- 27) specifically, reflect in local plans or supplementary planning policy the commitment of the [Leeds City Region Climate Coalition](#) and the [Leeds City Region Energy Strategy and Delivery Plan](#) to become a net zero carbon City Region by 2038 at the latest with significant progress by 2030².

Environment:

Parties agree to:

- 28) reflect in local plans the commitments in the [Leeds City Region Green and Blue Infrastructure Strategy and Delivery Plan](#), supporting shared ambitions to improve green and blue infrastructure (particularly in areas of poor health and deprivation).
- 29) work collaboratively to prepare catchment wide evidence on all forms of flooding; to increase the collective understanding of Natural Flood Risk Management and sustainable drainage systems; and ensure best practice on flood risk management in Local Plans and Development Management

² Leeds City Council have a stated target to be a net zero carbon city by 2030.

decisions, with a view to making the Leeds City Region an exemplar of good practice.

- 30) ensure net biodiversity gains are achieved for developments across the city region.

Health and Well-being:

Parties agree to:

- 31) understand the pipeline of housing development and its potential to deliver healthy places through plan making, including working closely with Clinical Commissioning Groups.

Education:

Parties agree to:

- 32) ensure sufficient provision is made for the education needs arising from new development, including the creation, expansion and alteration to schools.

Appendix 1 – Leeds City Region Partner Councils Housing Requirements (as of March 2020)

Local Authority	Adopted Local Plan		Emerging Local Plan		Notes on Adopted/Emerging Local Plan Requirement
	Standard Method for Calculating Local Housing Need ³ (dpa)	Local Plan Housing Requirement ⁴ (dwellings per annum (dpa))	Standard Method for Calculating Local Housing Need ³ (dpa)	Local Plan Housing Requirement ⁴ (dpa)	
Barnsley	1,134*	1,134	-	-	Adopted Local Plan (Jan 2019). Plan period 2014-2033. Plan period Requirement 21,546. *Based upon Objectively Assessed Need.
Bradford	2,476	2,476	1,703	1,703	Adopted Core Strategy (July 2017) 42,100 over period 2013-2030. Emerging Core Strategy: Partial Review Preferred Options Consultation (July 2019). Plan period 2020-2037. Plan period Requirement 28,951.
Calderdale	-	450	818 [#]	997*	Adopted Replacement Unitary Development Plan (August 2006) Amended by SoS August 2009. 6,750 dwellings between 2001 - 2016. Emerging Local Plan: Revised Housing Requirement following Stage 1 Hearings (October 2019). Period 2018/19-2032/33. Plan period Requirement 14,950. [#] For period 2018-2028, 2018 Affordability Ratio. *per annum average. Awaiting outcome of Examination with regard to the stepping of

³ Planning Practice Guidance (Housing and economic needs assessment, Para 010) states 'The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area.'

⁴ NPPF (Para 65) states: 'Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.'

					housing throughout the plan period.
Craven	123	230	-	-	Adopted Local Plan (November 2019). The standard method for Calculating Local Housing Need is taken from latest MHCLG figures for the Housing Delivery Test for 2017/18.
Harrogate	390	637	-	-	Adopted Local Plan (March 2020). Plan period 2014-2035. Plan period requirement 13,377.
Kirklees	1,730*	1,730	-	-	Adopted Local Plan (Feb 2019). Plan period 2013-2031. Plan period Requirement 31,140. *At the time the Local Plan was examined the latest published government Local Housing Need Assessment by district stated 1,707 dpa for Kirklees. The 1,730 dpa figure in this table is based upon Objectively Assessed Need as set out in the recently adopted Local Plan.
Leeds	2,649	3,247	-	-	Adopted Core Strategy Selective Review (Sept 2019). Plan period 2017-2033. Plan period Requirement 51,952.
Selby	450	450	365	TBC	Adopted Local Plan (Oct 2013). Emerging Local Plan: The Issues and Options document will be consulted upon between 24 January and 6 March 2020 which comprises the first stage of the Local Plan. The Local Plan housing requirement figure has yet to be established but will be informed by a new Housing and Economic Development Needs Assessment, responses to the Issues and Options consultation and early discussions with Duty to Cooperate partners.

Wakefield	977	1,600*	977	1,400	<p>Adopted Core Strategy (April 2009) 2008-2026. *This figure is now out of date when para. 73 of the NPPF is applied.</p> <p>Emerging Local Plan: Initial Draft (Dec 2018). Plan period 2017/18-2035/36 (19 years). Local Plan Requirement will be a range, currently 977 - 1,400 dpa. Local Plan period Requirement range (18,563 - 26,600). The bottom of these ranges will change annually when new data is published to allow recalculation using the standard method.</p>
York	-	-	-	822	<p>Draft Local Plan Incorporating the 4th set of changes (Approved April 2005).</p> <p>Emerging Local Plan submitted for Examination on 25 May 2018. Proposed Modification (June 2019) to Publication version of the Plan to identify a housing requirement of 822 dpa based upon an updated OAN of 790 dpa plus inherited shortfall/backlog from 2012 to 2017. Plan period 2017-2032/33.</p>
Total				12,350*	<p>*If a Local Authority is not currently developing a Local Plan the adopted local plan housing requirement has been used to calculate the total City Region figure.</p>

Leeds City Region SEP Scenario	10,239 – 12,948 (mid-point 12,038)	Based on economic growth scenario Jobs-led (REM) EA2 (see paragraph 3.8). This scenario provides a useful starting point in establishing the general scale of growth across the City Region; however, the economic scenario for the City Region does not constitute Objectively Assessed Need.
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Appendix 2 – Document References

National Documents:

<https://www.gov.uk/government/publications/national-planning-policy-framework--2> - National Planning Policy Framework

<https://www.gov.uk/government/collections/planning-practice-guidance> - National Planning Practice Guidance

Sub-national Documents:

<https://transportforthenorth.com/wp-content/uploads/TfN-final-strategic-transport-plan-2019.pdf> - Transport for the North, Strategic Transport Plan (February 2019)

Leeds City Region Documents:

<https://www.westyorks-ca.gov.uk/growing-the-economy/economic-strategy/> - Leeds City Region Strategic Economic Plan (May 2016)

<https://www.westyorks-ca.gov.uk/growing-the-economy/leeds-city-region-infrastructure-map/> - Leeds City Region Infrastructure Map

<https://www.the-lep.com/media/2263/lcr-hma-final-report-oct16.pdf> - Leeds City Region Housing Market Areas, CURDS (July 2016)

<https://www.westyorks-ca.gov.uk/projects/priority-4d-enterprise-zones/> - Leeds City Region Enterprise Zones

<https://www.westyorks-ca.gov.uk/improving-transport/leeds-city-region-hs2-growth-strategy/> - Leeds City Region HS2 Growth Strategy (2018)

<https://www.westyorks-ca.gov.uk/all-news-and-blogs/politicians-businesses-and-young-people-join-forces-as-leeds-city-region-climate-coalition/> - Leeds City Region Climate Coalition Article (10 July 2019)

<https://www.westyorks-ca.gov.uk/media/2424/leeds-city-region-energy-strategy.pdf> - Leeds City Region Energy Strategy and Delivery Plan (December 2018)

<https://www.westyorks-ca.gov.uk/media/2432/leeds-city-region-green-and-blue-infrastructure-4-page-final.pdf> - Leeds City Region Green and Blue Infrastructure Strategy and Delivery Plan – Executive Summary

West Yorkshire Documents:

<https://www.westyorks-ca.gov.uk/media/2379/transport-strategy-2040.pdf> - West Yorkshire Transport Strategy 2040

<https://www.bradford.gov.uk/media/3590/west-yorkshire-low-emissions-strategy.pdf> - West Yorkshire Low Emissions Strategy (2016-2021)

Partner Council Documents:

<https://www.barnsley.gov.uk/services/planning-and-buildings/local-planning-and-development/our-new-local-plan/barnsleys-local-plan/> - Barnsley Adopted Local Plan (January 2019)

<https://www.bradford.gov.uk/Documents/planningStrategy/adopted%20core%20strategy/10/Adopted%20core%20strategy//1%20Core%20Strategy%20full%20document.pdf> – Bradford Adopted Core Strategy (July 2017)

<https://www.calderdale.gov.uk/v2/sites/default/files/replacement-unitary-development-plan.pdf> - Calderdale Adopted Replacement Unitary Development Plan (August 2006) (Amended by SoS August 2009)

<https://www.cravendc.gov.uk/media/8733/z-local-plans-ldf-314-local-plan-adoption-2019-lp-adoption-docs-final-adoption-local-plan-pdfs-craven-local-plan-appendices-and-policies-map.pdf> - Craven Adopted Local Plan (November 2019)

https://www.harrogate.gov.uk/info/20101/planning_policy_and_the_local_plan - Harrogate District Adopted Local Plan (March 2020)

<https://www.kirklees.gov.uk/beta/planning-policy/pdf/local-plan-strategy-and-policies.pdf> - Kirklees Adopted Local Plan, Strategy & Policies (February 2019)

<https://www.leeds.gov.uk/Local%20Plans/Adopted%20Core%20Strategy/Consolidated%20Core%20Strategy%20with%20CSSR%20Policies%20Sept%202019.pdf> – Leeds Adopted Core Strategy Selective Review (September 2019)

https://www.selby.gov.uk/sites/default/files/Documents/CS_Adoption_Ver_OCT_2013_REDUCED.pdf - Selby Adopted Core Strategy Local Plan (October 2013)

<http://www.wakefield.gov.uk/Documents/planning/planning-policy/local-plan/core-strategy/core-strategy.pdf> - Wakefield Adopted Core Strategy (April 2009)

https://www.york.gov.uk/downloads/file/3663/the_local_plan_2005_-_development_control_local_plan_full_document_and_appendicespdf - City of York Draft Local Plan Incorporating the 4th set of changes (Approved April 2005).

Other Documents:

<https://www.northyorks.gov.uk/local-transport-plan> - North Yorkshire Local Transport Plan

https://d2xjf5riab8wu0.cloudfront.net/wp-content/uploads/2019/03/SCR_Transport_Report-v4.5-04.06.19.pdf - Sheffield City Region Transport Strategy 2040



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